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1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

3 EASTERN PROFIT CORPORATION  
4 LIMITED,

5 Plaintiff,

6 v.

18 CV 2185 (LJL)

7 STRATEGIC VISION US LLC,

8 Defendant.

9 New York, N.Y.  
10 April 21, 2021  
9:37 a.m.

11 Before:

12 HON. LEWIS J. LIMAN,

13 District Judge

14 APPEARANCES

15 TROUTMAN PEPPER HAMILTON SANDERS LLP

Attorneys for Plaintiff

16 BY: CHRISTOPHER B. CHUFF

JOANNA J. CLINE

17 GRAVES GARRETT LLC

18 Attorneys for Defendant

19 BY: EDWARD DEAN GREIM

JENNIFER A. DONNELLI

20 ALSO PRESENT:

21 Melissa Francis, Eastern Profit Corporation Limited  
22 J. Michael Waller, Strategic Vision US LLC

23 UNA WILKINSON, Mandarin Interpreter

LENNY YANG, Check Mandarin Interpreter

24 JOSHUA KLEIN, Attorney for Mr. Guo

25 PETRILLO, KLEIN & BOXER, LLP

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(Trial resumed)

THE COURT: Be seated. Good morning. Before we get started with the testimony, a couple of preliminary matters. I received letters overnight reflecting objections to certain exhibits. With respect to PX71, the Court will reserve judgment on the objections to the admissibility.

With respect to PX67, I don't think that exhibit was actually offered. It was used, I think, for cross-examination, but I'll check the record. To the extent it was offered, the Court will reserve decision on whether to receive the exhibit.

And with respect to DX56, which is I think the invoice, the Court will receive that as a business record.

(Defendant's Exhibit DX56 received in evidence)

With that, Ms. Cline, anything before we get started with the testimony?

MS. CLINE: I think there is a little housekeeping with exhibits, too, your Honor. The parties conferred, per your direction, as to exhibits and tried to eliminate the duplicates so we can provide that in a nicer format for Mr. Fishman.

But in the meantime, we also agreed, on the plaintiff's side, we had intended to offer DX32, but neglected to do so. We're offering it not for the truth of the matter, but just for the fact that it was publicly available on the date shown on the face of the document. I've conferred with

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1 Mr. Greim. He doesn't object, and then I believe Mr. Greim has  
2 some cleanup to do as women.

3 THE COURT: That will be received.

4 (Defendant's Exhibit DX32 received in evidence)

5 By the way, all of the other exhibits that were  
6 offered yesterday, with the exception of the two as to which I  
7 indicated I'm going to reserve judgment and which were received  
8 for the purposes indicated, subject to a motion to strike, will  
9 now be received.

10 One other matter before I hear from Mr. Greim is a  
11 reminder to counsel for both parties. As you are leaving the  
12 podium after questioning, please make sure to wipe off the  
13 podium, conforming with the district's social distancing Covid  
14 restrictions.

15 Mr. Greim?

16 MR. GREIM: Your Honor, there were two exhibits I  
17 neglected to move for entry yesterday. Those were DX24, power  
18 of attorney, and DX68, the rule 26.1 statement of Eastern  
19 Profit. And I conferred with Ms. Cline about both of those.  
20 We move for their admission.

21 THE COURT: Is there any objection to those?

22 MS. CLINE: No, your Honor.

23 THE COURT: Those will be received.

24 (Defendant's Exhibits DX24 and DX68 received in  
25 evidence)

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Wang - Cross

1 THE COURT: All right. Ms. Wang, you're reminded that  
2 you are still under oath. Mr. Greim, you may inquire.

3 YAN PING WANG, Resumed

4 CROSS-EXAMINATION (Resumed)

5 BY MR. GREIM:

6 Q. Good morning, Ms. Wang. Now, Eastern Profit is a private  
7 company organized under the laws of Hong Kong; isn't that  
8 right?

9 A. Correct.

10 Q. And until he sold his interest in Eastern in 2017,  
11 Mr. Chunguang Han was the sole director of Eastern?

12 A. I didn't know by then.

13 Q. Okay. I'm just asking you today if you know now. Did you  
14 know that until he sold his interest in 2017, Mr. Chunguang Han  
15 was the sole director of Eastern?

16 A. I don't believe so.

17 Q. You think that's incorrect?

18 A. I don't know, to be honest.

19 Q. And in 2017, Mr. Han transferred ownership of Eastern to  
20 Guo Mei, correct?

21 A. Correct.

22 Q. And Guo Mei is Guo Wengui's daughter?

23 A. Correct.

24 Q. Let's pull up DX80. And I'll tell you, this is a  
25 multi-page exhibit. You'll see in the bottom right-hand corner



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Wang - Cross

1 you've got -- this was produced to us by you, by Eastern, and  
2 it is a compilation of the corporate filings of Eastern Profit  
3 in Hong Kong.

4 If you could scroll through and let's just kind of go  
5 through slowly here. Can you go to the top again?

6 Do you see that this one is from July the 29th of  
7 2015, right?

8 A. Correct.

9 Q. And the registered office at that time was 49 Bank of China  
10 Tower, No. 1 Garden Road, Hong Kong?

11 A. Correct.

12 Q. And that's correct, isn't it?

13 A. I read from the paper, yes.

14 Q. Okay. Do you have an independent knowledge that that was  
15 the Hong Kong office?

16 A. I don't have personal knowledge.

17 Q. Okay. By the way, you were still in Hong Kong in 2015,  
18 weren't you, or not?

19 A. You mean July 29th, 2015?

20 Q. Yes.

21 A. No. I was in the U.S.

22 Q. Okay. So you came to the U.S., what, a few months before  
23 this, then?

24 A. Yes.

25 Q. When you were in Hong Kong, did you ever have cause to go

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Wang - Cross

1 to 49F Bank of China Tower?

2 A. I believe so.

3 Q. Why were you going there?

4 A. For business.

5 Q. Okay. Very good. What kind of business?

6 A. I don't remember clearly. These towers are a very popular  
7 building in the central in Hong Kong. Everybody knows that.

8 Q. Sure. I'm asking you about the ones at 49F at the Bank of  
9 China Tower. What was the reason for your going to 49F at the  
10 Bank of China Tower?

11 A. I believe the China Golden Spring office is there also.

12 Q. Very good. Let's scroll down again. By the way, were you  
13 working for China Golden Spring at that time?

14 A. I was in the U.S. already by then.

15 Q. So you went back to Hong Kong to go to the China Golden  
16 Spring office from time to time?

17 A. You're asking when?

18 Q. I'm just asking you, when you went to the China Golden  
19 Spring office, were you working for China Golden Spring?

20 A. You ask of 2017 July, or before that?

21 Q. Let's go before that.

22 A. Before that, yes.

23 Q. Then after July of 2017, why were you going to the China  
24 Golden Spring's office in the Bank of China Tower?

25 MS. CLINE: Objection, relevance.

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Wang - Cross

1 THE COURT: I'll permit it. Overruled.

2 A. I came to the U.S. in April 2017. So after that, I barely  
3 went back to Hong Kong.

4 Q. I understand. And I'm just asking, when you did go back to  
5 Hong Kong, why did you go to 49F at the Bank of China Tower?

6 A. For business.

7 Q. Okay. And was that business to go to the China Golden  
8 Spring office?

9 A. Correct.

10 Q. Okay. Let's keep scrolling. Keep going down to the next  
11 report. Let's actually stop here.

12 Now, you see at this time Han Chunguang --

13 THE COURT: Can you indicate for the record and for me  
14 the page number?

15 MR. GREIM: Yes, I'm sorry. So this is stamped --  
16 let's go to the very bottom so I can see that -- Eastern 358.  
17 This is, again, Exhibit 80.

18 BY MR. GREIM:

19 Q. And did you see Han Chunguang is listed as the natural  
20 person director for Eastern Profit?

21 A. I read from the paper, yes.

22 Q. And this is as of July 2017, correct?

23 A. From the paperwork, yes.

24 Q. Who knows about Eastern Profit? Who can tell us about its  
25 office and ownership?

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Wang - Cross

1 A. I mean, you probably should ask Eastern Profit  
2 representative.

3 Q. Well, you're here. You've got a power of attorney to  
4 represent Eastern Profit for purposes of this case, don't you?

5 A. Correct.

6 Q. And you don't know the answer to these questions?

7 A. It doesn't mean that I should know everything about Eastern  
8 Profit. It depends on what you ask, right?

9 Q. Okay. Let's keep scrolling through. Actually, let's go  
10 all the way to the bottom. Let's go to the very last report.  
11 Keep going. Okay. Go up a little further. Okay. Let's stop  
12 here. No, I'm sorry. You'll have to go one more. Go down one  
13 page.

14 While we're looking at this, let me ask you, Ms. Wang,  
15 other than this, Eastern Profit produce any other accounting or  
16 bank records in this case, correct?

17 A. I did not bring that myself.

18 Q. Do you know if Eastern Profit has any other bank or  
19 accounting records?

20 A. I'm not quite sure.

21 Q. Does it have any ledgers in which it keeps track of  
22 financial transactions?

23 A. I don't know about that.

24 Q. Does it have any kind of income or loss statements?

25 A. Again, I don't know this detail.

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Wang - Cross

1 Q. It doesn't have any, does it?

2 A. I cannot say. I just represent Eastern Profit on this  
3 investigation project as this litigation. That's it.

4 Q. Very good. We've now come to the first page of this last.  
5 You know, let's --

6 MR. GREIM: I'm going to offer DX80.

7 THE COURT: Any objection as to authenticity or --

8 MS. CLINE: Not as to authenticity.

9 THE COURT: It's received subject to motion to strike.

10 (Defendant's Exhibit DX80 received in evidence)

11 BY MR. GREIM:

12 Q. Actually, we will go to the very last -- second-to-last --  
13 oh, we're there.

14 So you'll see that this document, once again, Eastern  
15 Profit Corporation Limited, it's a notice of change of address  
16 of registered office. Do you see where the registered office  
17 is changed to?

18 A. From the paperwork, yes.

19 Q. Okay. 20 South Bay Road, Repulse Bay?

20 A. From the record, yes.

21 Q. In Hong Kong, right?

22 A. Correct.

23 Q. October 9th, 2019?

24 A. From the record, yes.

25 Q. Is that address familiar to you, 20 South Bay Road, No. 20

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Wang - Cross

1 South Bay Road? Have you ever heard of that before?

2 A. I don't remember that.

3 Q. Have you been there?

4 A. I don't remember that.

5 Q. Okay. Let's scroll down to the very last page.

6 Now, you'll see that by this time, as we testified --  
7 you mentioned before, the director is Guo Mei, right?

8 A. From the records, yes.

9 Q. And it says her residential address is 20 South Bay Road,  
10 Majestic View Manor, right?

11 MS. CLINE: Objection, relevance. We're talking 2019  
12 now.

13 THE COURT: Overruled.

14 A. From the paperwork, yes.

15 Q. Now, was she actually living there at this time?

16 MS. CLINE: Objection.

17 THE COURT: Overruled.

18 A. I don't know.

19 Q. And you testified yesterday she's living in the U.S. now,  
20 right?

21 A. She lives in the U.S. right now, yes.

22 Q. And you speak to Guo Mei a lot, right?

23 A. What do you mean "a lot"? I don't understand.

24 Q. Let's play C14.

25 (Video being played)

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Wang - Cross

1           Now, this was your October 30, 2019, deposition,  
2 right?

3 A. Correct.

4 Q. And you had just been speaking -- you testified at that  
5 deposition that you spoke with Guo Mei in between your two  
6 depositions, right?

7 A. We did.

8 Q. And you said you spoke with her a lot, right?

9 A. This is what I said in my deposition.

10 Q. Was that true? Was that truthful?

11 A. It is. It doesn't mean that I'm not telling the truth  
12 right now.

13 Q. No, no. I'm just asking, is it truthful?

14 A. Correct.

15 Q. And the reason you spoke with Guo Mei was to ask her  
16 questions about Eastern Profit, correct?

17 A. Not only about that.

18 Q. Is that one reason that you spoke with her?

19 A. Correct.

20 Q. And again, just to be clear for the record, this was  
21 sometime in between January, your first deposition, and October  
22 2019, your second deposition, right?

23 A. Correct.

24 Q. Now, when you spoke with Guo Mei at that time, had she  
25 traveled back to the U.S. or was she living here?

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Wang - Cross

1 A. I don't know. I cannot say that. We talked by phone call.  
2 That's it.

3 Q. Well, you said you met her?

4 A. Correct, we met.

5 Q. Okay. Where did you meet?

6 A. In our office building.

7 Q. The Golden --

8 A. In the lobby.

9 Q. I'm sorry. At the Golden Spring New York office?

10 A. Yes.

11 Q. And when you asked Guo Mei, she didn't know anything about  
12 Strategic, did she?

13 A. She does not know at all.

14 Q. And all Guo Mei could tell you was that Eastern assets had  
15 been frozen, correct?

16 A. No. She ask about the investigation litigation here, asked  
17 when we can have this case resolved.

18 Q. My question is what she told you when you asked her about  
19 Eastern Profit, okay? So what else did she tell you about  
20 Eastern Profit?

21 A. She didn't tell me.

22 Q. She told you that they have an office in Hong Kong, didn't  
23 she?

24 A. I don't remember that.

25 Q. Was Eastern still keeping an office in Hong Kong in the



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Wang - Cross

1 summer of 2019, as we were litigating this case?

2 A. I don't think so.

3 Q. Eastern has no office in the U.S., does it?

4 A. Correct.

5 Q. It has no employees in the U.S.?

6 A. Correct.

7 Q. It has no business operations in the U.S.?

8 A. Correct.

9 Q. It has no business operations in Hong Kong?

10 A. You mean when?

11 Q. Today.

12 A. I don't think so. They're frozen.

13 Q. And it had no business operations in Hong Kong in 2019, did  
14 it?

15 A. I don't know about that.

16 Q. It had no business operations in Hong Kong in 2017, did it?

17 A. I have no personal knowledge about that.

18 Q. Eastern's not registered to do business in New York, is it?

19 A. I believe so.

20 Q. Oh, it is registered to do business in New York?

21 A. Say your question again?

22 Q. Is Eastern registered to do business in New York?

23 A. Eastern -- I don't believe Eastern is registered; so it's  
24 not registered in New York.

25 Q. Now, Eastern's bank account was frozen in June 2017,

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Wang - Cross

1 correct?

2 A. I'm not quite sure about that detail. I was just told it's  
3 frozen, but I didn't know the precise date.

4 Q. Well, remember I took your deposition in October, and I  
5 asked you that same question, didn't I? Do you recall that?

6 A. I don't remember that.

7 Q. Did you testify truthfully at that deposition?

8 A. I tried my best.

9 Q. And you swore under oath, right?

10 A. I did.

11 Q. Let's play C44.

12 (Video being played)

13 MS. CLINE: Can we take that image down?

14 MR. GREIM: Yes, sorry.

15 (Pause)

16 BY MR. GREIM:

17 Q. Okay. You'll see on 56, line 7, I asked you: "Did Eastern  
18 have an understanding how it was going to pay back this loan?

19 "A. By this lawsuit. That's why Eastern sued to get this one  
20 million back, because Eastern's bank account was frozen."

21 Did I read that right so far?

22 A. Correct.

23 Q. And by the way, that's correct; that's why Eastern sued?

24 A. I believe so.

25 Q. And then I asked: "It wasn't frozen yet at that time, in

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Wang - Cross

1 the fall of 2018?

2 "A. Eastern's bank account was frozen around June of 2018,  
3 yes."

4 Did I read that right?

5 A. Correct.

6 Q. Then I asked you: "Although, that was after the lawsuit  
7 was filed, wasn't it? The lawsuit was filed in March of 2018,  
8 isn't that right?

9 "A. Oh, yeah. This is a memory test. My mistake. You are  
10 confusing me with all these dates back and forward, Eddie. So  
11 correction, Eastern's bank account was frozen. When is it this  
12 contract was signed, SV's contract?"

13 Did I read that correctly so far?

14 A. Correct.

15 Q. And then I told you:

16 "Q. It's dated -- it was signed January 6th, 2018.

17 "A. January 2018. Eastern's bank account was frozen in June  
18 of 2017. This is the correct answer."

19 Did I read that correctly?

20 A. You read that correctly.

21 Q. That was your testimony, right?

22 A. Right.

23 Q. And when Eastern's bank account was frozen, was its office  
24 raided?

25 A. I don't remember that clearly now.

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Wang - Cross

1 Q. Did it have any employees who were imprisoned or arrested?

2 A. I don't know about that.

3 Q. Did the same thing happen to China Golden Spring at the  
4 same time as Eastern Profit?

5 A. I'm not familiar about that.

6 Q. I'm sorry. You're not familiar with whether -- so let me  
7 ask you. Are you familiar with whether China Golden Spring's  
8 assets in China and Hong Kong have been frozen?

9 A. Correct.

10 Q. So they have been frozen, correct?

11 A. They are frozen.

12 Q. And is China Golden Spring conducting any operations in  
13 Hong Kong right now?

14 MS. CLINE: Objection, relevance.

15 THE COURT: What is the relevance of that?

16 MR. GREIM: Well, your Honor, I'm trying to -- I think  
17 these entities are connected. I think they're basically all  
18 the same thing. I'm trying to get an answer with what's going  
19 on with Eastern Profit.

20 THE COURT: I'll sustain the objection.

21 BY MR. GREIM:

22 Q. And the amount -- let me ask you this. Now, your claim in  
23 this case is that the High Court of the Hong Kong, Special  
24 Administrative Region, is the one that froze the assets of  
25 Eastern Profit, correct?

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Wang - Cross

1 A. By the Chinese government via Hong Kong.

2 Q. Under the influence of the Chinese government, right?

3 A. Hong Kong is China. Chinese communist took Hong Kong  
4 completely. They are the same.

5 Q. First, I'm going to show you -- hold on. I'm going to show  
6 you a letter written by your counsel to our magistrate judge in  
7 this case, Exhibit 126.

8 Just scroll down, if you could.

9 And then you'll see the very last paragraph. First of  
10 all, it's signed by Ms. Cline, correct? Electronic signature?

11 A. From the paperwork, yes.

12 Q. All right. And then you see Ms. Cline tells Judge Freeman,  
13 "The assets of Mr. Guo and Eastern Profit that have been frozen  
14 in Hong Kong were frozen not by the CCP or mainland China, but  
15 by the High Court of Hong Kong;" do you see that?

16 A. The High Court of Hong Kong, they are in the Hong Kong, of  
17 course, but they are influenced by CCP or mainland China.  
18 Technically, my counsel said not by CCP or mainland China is  
19 correct. There's no problem about that.

20 Q. So you agree with her statement?

21 A. Correct.

22 Q. And then she says: "See Exhibit B."

23 And let's pull up Exhibit B. This is the order that  
24 she attached to her letter.

25 Now, did you agree with Ms. Cline's letter before it

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Wang - Cross

1     went out? Did you review it?

2     A. You mean review all the 56 pages?

3     Q. No, I'm just asking about her letter.

4             MS. CLINE: Objection, to the extent it calls for  
5     privileged conversations.

6             THE COURT: You're not being asked for your  
7     conversation with Ms. Cline. It's just being asked if you  
8     reviewed the letter before it was sent.

9             THE WITNESS: Yes, your Honor.

10    Q. And you saw this attach --

11             THE COURT: I don't know -- you said "yes, your Honor"  
12    to me, but I don't think you've answered Mr. Greim's question.

13             MR. GREIM: Oh, I thought she did.

14    BY MR. GREIM:

15    Q. Was the answer to my question "yes"?

16    A. Can you say the question again? Sorry.

17    Q. You reviewed Ms. Cline's letter before it was submitted to  
18    the Court, correct?

19    A. I believe my counsel went through the contents with me.

20    Q. Okay. Now, let's go to Exhibit B, and you've seen this  
21    order before, correct?

22    A. I don't remember that.

23    Q. This is the Exhibit B she attached to her letter?

24    A. Correct.

25    Q. And you'll see it's from the Hong Kong Special

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Wang - Cross

1 Administrative Region, the High Court, right?

2 A. From the paperwork, yes.

3 Q. All right. And if you scroll down to page 3, you'll see  
4 that one of the respondents, whose assets are frozen, is  
5 Eastern Profit Corporation Limited, correct?

6 A. From the paperwork, yes.

7 Q. And then it's listed here as "respondent 16"?

8 A. Correct.

9 Q. Now, let's go to page 14. Sorry. Oh, there we go.

10 And you'll see for respondent 16, it lists the assets  
11 that are being frozen. You'll just see that there is a -- it  
12 mentions China Minsheng Banking Corporation, Hong Kong branch;  
13 do you see that?

14 A. Correct.

15 Q. The total amount, it mentions different currencies in  
16 there. The total amount is Hong Kong, 578-some-odd-thousand  
17 dollars; do you see that?

18 A. I did.

19 Q. Are these the profits of Eastern Profit that were frozen in  
20 Hong Kong?

21 A. From the High Court paperwork, looks like, yes.

22 Q. When you said you understood the assets were frozen, are  
23 these the assets that you understood were frozen?

24 A. From the paperwork, correct.

25 Q. Have you seen this order before, before your counsel

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Wang - Cross

1 submitted it?

2 A. I believe so.

3 Q. The very first -- let's go back there to the first page.

4 The very first respondent here is who? Who is that?

5 A. K-W-O-K, H-O, W-A-N.

6 Q. Who is that?

7 A. This is Mr. Guo.

8 Q. He goes by two names, correct?

9 A. You mean on this paperwork?

10 Q. No. I'm just asking you for your knowledge. He goes by  
11 two names, by at least two names, right?

12 A. He has his official name and his English name. Correct.

13 Q. And underneath here Guo Qiang, is this his son?

14 MS. CLINE: Objection, relevance.

15 THE COURT: What is the relevance?

16 MR. GREIM: Well, your Honor, I'm trying to establish  
17 when these assets were frozen because it goes to the  
18 credibility of the witness' testimony.

19 THE COURT: I'll permit limited examination.

20 MR. GREIM: I'm just about done with this exhibit,  
21 your Honor.

22 BY MR. GREIM:

23 Q. That's his son, correct?

24 A. Correct.

25 Q. And then I want to go to the third page -- I'm sorry, the



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Wang - Cross

1 second page, the third respondent. Qu -- I'm probably not  
2 going to say this correctly, but Qu Guo Jiao; do you see that  
3 name?

4 A. I saw it.

5 Q. Do you know who Qu Guo Jiao is?

6 MS. CLINE: Objection, relevance.

7 THE COURT: Overruled.

8 A. What's your question?

9 Q. Do you know who she is?

10 A. I'm not quite sure.

11 Q. You don't know anyone by that name?

12 A. I don't remember that.

13 Q. Okay. Last question on this document. Let's go to page 4.

14 THE COURT: Mr. Greim, is this yet 126?

15 MR. GREIM: It's actually DX126B. We broke apart this  
16 so that we have three different documents. 126 is the letter  
17 itself. This is 126B.

18 THE COURT: I don't have 126B, but that's fine.

19 MR. GREIM: Okay. Maybe -- I know at some point we  
20 adjusted our numbering.

21 THE COURT: That's fine. I don't need it. Ask your  
22 question. I've got it on the screen.

23 MR. GREIM: Okay.

24 BY MR. GREIM:

25 Q. Do you see respondent 22 on here is China Golden Spring

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Wang - Cross

1 Group Hong Kong Limited?

2 A. Correct.

3 Q. And this is the entity yesterday that you testified you  
4 take direction from?

5 A. Correct.

6 Q. And then finally, at the very -- second-to-last name, do  
7 you see Han Chunguang?

8 A. Yes, I did.

9 Q. Now, yesterday you said that Mr. Chunguang came to the  
10 United States in, I believe you said, early 2015 with you,  
11 correct?

12 A. I did not say with me.

13 Q. Okay. Around the same time as you?

14 A. I heard it was in early 2015, but I don't know when.

15 Q. Okay.

16 A. But he definitely not come together with me. You're  
17 misleading me, sir.

18 Q. I'm sorry. I don't intend to do that, Ms. Wang.

19 We're going to pull up DX5.

20 By the way, I move for the admission of 126 and 126B.

21 THE COURT: Those are received subject to motion to  
22 strike.

23 (Defendant's Exhibits 126 and 126B received in  
24 evidence)

25 BY MR. GREIM:

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Wang - Cross

1 Q. Okay. So this is the cover page of Eastern Corporation's  
2 Limited -- Eastern Profit Corporation's responses and objection  
3 to Strategic's first set of interrogatories in this case. Do  
4 you recall, have you seen this document before?

5 A. Correct.

6 Q. Let's go to the bottom, the signature page. And once  
7 again, you've seen this before? This is your signature, isn't  
8 it?

9 A. Correct.

10 Q. Notarized by Karen Maistrello?

11 A. From the paperwork, yes.

12 Q. She's a Golden Spring New York employee, isn't she?

13 A. She is not right now.

14 Q. But she was at this time, right?

15 A. Correct.

16 Q. All right. Let's look at a few of these responses here.  
17 Let's scroll up to -- let's go up a little higher. Keep going.  
18 Keep going. Okay, let's stop.

19 No. 5. Each person with knowledge of the agreement,  
20 including negotiation of the same, Han Chunguang does not  
21 appear on this list, does he?

22 A. I didn't see his name here.

23 Q. All right. And by the way, you swore to these responses in  
24 December of 2018, right? You just saw that?

25 A. Correct.

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Wang - Cross

1 Q. So this was about a year after the negotiations, right?

2 A. Almost.

3 Q. Almost. Okay. Let's keep going. Scroll to the next page.

4 One more.

5 Okay. Identify each person with knowledge of the  
6 information provided by Eastern to Strategic Vision under the  
7 agreement, including the flash drives. Once again, Han  
8 Chunguang is not there, correct?

9 A. I didn't see his name here.

10 Q. And you're the one who provided the information and swore  
11 to these responses, correct?

12 A. You're right.

13 Q. And you satisfied yourself that these were truthful when  
14 you answered them, right?

15 A. You are right.

16 Q. Okay. Let's keep going. Let's go to 12. I'm going to  
17 overlap.

18 Identify each person with knowledge of Eastern's  
19 demand for the return of the \$1 million deposit. Do you see in  
20 your response any reference to Han Chunguang?

21 A. I didn't see his name here.

22 Q. Okay. Same answer for No. 13, the attempt to reverse the  
23 wires. He's not listed, is he?

24 A. I didn't see his name here.

25 Q. Only you and Guo Wengui?

L4LPEAS1

Wang - Cross

1 A. Yeah, because only me and Guo Wengui, we stood up. The  
2 rest of the people, they were afraid of being persecuted.  
3 That's the whole --

4 MR. GREIM: I move to strike. That wasn't my --  
5 that's beyond the question.

6 THE COURT: Overruled.

7 MR. GREIM: Let's keep going.

8 BY MR. GREIM:

9 Q. Okay. No. 16, itemized statement of your alleged damages,  
10 and then you say here it's a million dollars, right? Your  
11 damages are the million dollars that was paid as a deposit; is  
12 that right?

13 A. Correct.

14 Q. Okay. Then we asked for everybody who knows, who can  
15 testify about those damages. Let's look at No. 17. No  
16 reference to Han Chunguang in the answer to No. 17, is there?

17 A. I didn't see his name here.

18 Q. Now, you knew who Han Chunguang was by this time, didn't  
19 you?

20 A. Correct.

21 Q. In fact, you did give his name in response to another  
22 question in these responses, right?

23 A. Correct.

24 Q. The question that said who the principal of Eastern, you  
25 gave his name as a response, didn't you?

L4LPEAS1

Wang - Cross

1 A. Correct.

2 Q. But you didn't say he had any knowledge of Eastern's \$1  
3 million in damages?

4 A. Still a question again, please?

5 Q. You didn't tell us that Han Chunguang had any knowledge of  
6 Eastern's \$1 million in damages?

7 A. I don't remember that.

8 Q. We just looked at your responses, right?

9 A. Correct. This is a public record; so if his name is out  
10 there, it's going to be public. The Chinese Communist will  
11 find him.

12 Q. So did you withhold his name from your sworn response?

13 A. I didn't mean it. I'm protecting people's life.

14 Q. So did you withhold information from your sworn responses  
15 in order to protect people's lives in this case?

16 A. I'm giving my best knowledge and my best memory with  
17 protecting people's life in danger.

18 THE COURT: I want counsel, before we -- why don't we  
19 move on to a different subject for the moment. Because of this  
20 subject, Ms. Wang may want to speak to counsel about this  
21 subject before we go further.

22 BY MR. GREIM:

23 Q. Now, you have testified that Eastern Profit needs a million  
24 dollars in this case to -- so they can repay a supposed loan to  
25 an entity called ACA, correct?

L4LPEAS1

Wang - Cross

1 A. Correct.

2 Q. And ACA is the entity that actually sent the fundings to  
3 Eastern Profit, correct?

4 A. Correct.

5 Q. Let's pull up DX21. No, this is right, 20. And just  
6 scroll through so she can see.

7 So, Ms. Wang, do you recognize this as an exchange you  
8 had on Signal with Michael Waller?

9 A. Correct.

10 Q. And he's the one who's Pyratz on here?

11 A. Correct. He give me his name, yes.

12 Q. And this happened on January the 30th, right?

13 A. Correct.

14 Q. And let's go to the page that's labeled 263, Eastern 263,  
15 page 2. You respond to Dr. Waller and you say: "He said the  
16 biggest problem is that your people didn't even find the door  
17 after ten days, not mentioned about entering the door."

18 And you go on. You were criticizing the deliverable  
19 by Strategic Vision, correct?

20 A. Correct.

21 Q. Okay. Now, let's go on to Exhibit 21. I'm going to show  
22 you another -- these are broken up into different exhibits,  
23 Ms. Wang. You'll see another e-mail in this exchange, and  
24 again, you are in light gray and he's in dark gray -- or I'm  
25 sorry. He's in light gray; you're in dark gray, right?

L4LPEAS1

Wang - Cross

1 A. I'm in the dark gray.

2 Q. Right. And so the tail end of his communication is, he's  
3 talking about his team, he said: "They hit all their targets.  
4 I trust them." Do you see that?

5 A. Correct.

6 Q. And then you say: "Yes. As you know, big budget is ready  
7 for this long-term project. The investors can even pay your  
8 team without contract." Do you see that?

9 A. I saw that.

10 Q. Now, were you proposing to start paying Dr. Waller without  
11 a contract?

12 A. No, I did not.

13 Q. Were you --

14 A. I was remind him the fact.

15 Q. You're referring to the fact that ACA wired the million  
16 dollars when the contract wasn't signed yet, correct?

17 A. Correct.

18 Q. And then you go on and you say: "But the investors would  
19 not continue to spend money on the things they don't need. For  
20 instance, the things of today." Right?

21 A. Correct.

22 Q. And that's what you believed at that time?

23 A. The investor, they are the people who are purchasing --

24 Q. My question is, that's what you believed at that time,  
25 correct?



L4LPEAS1

Wang - Cross

1 A. I don't know what he believed or what.

2 Q. No. I'm asking what you believed at that time. What you  
3 wrote is what you believed at that time?

4 A. What I believe is the investors, they are the people who  
5 are persecuted.

6 Q. I'm not asking --

7 THE COURT: Ms. Wang, you're instructed to answer the  
8 question that you're asked. You'll have an opportunity, when  
9 Ms. Cline examines you, to clarify things if she asks you the  
10 question. But you're directed to answer Mr. Greim's questions.

11 Mr. Greim, ask your question again.

12 Q. In the first paragraph, where you said "but the investors  
13 would not continue to spend money on the things they don't  
14 need. For instance, the things of today," is that what you  
15 believed at the time?

16 A. Correct.

17 Q. And the next paragraph you say: "Checked with them. We  
18 have 20 days to update them, two to three times hopefully, with  
19 the financial and tracking results agreed in contract. Even  
20 partly, but please be correct." Is that what you believed at  
21 the time?

22 A. Correct.

23 Q. And then you say: "Without above, the investors could not  
24 move to second month with us and hard to do future with us, I'm  
25 afraid."

L4LPEAS1

Wang - Cross

1 Did I read that part of the message correctly?

2 A. You read correctly, sir.

3 Q. And is that what you believed at the time?

4 A. Yes.

5 Q. Now, when was the investors' first monthly payment due?

6 A. Are you asking about the contract?

7 Q. Under the contract.

8 A. What's your question? Sorry.

9 Q. When was the investors' first monthly payment due?

10 A. Due by the client, received the high qualified --  
11 high-quality deliverable reports.

12 Q. Was it due on any particular day?

13 A. It not go by day. Go by deliverable report, high  
14 quality --

15 Q. I'm sorry. Go ahead.

16 A. High-quality deliverable reports with information with  
17 great in the contract. Payment goes by the deliverable  
18 reports.

19 Q. Your testimony is the payment wasn't due each month, right?

20 A. The payment was not due by the date. Due by the reports.

21 Q. When you say "checked with them," were you referring to  
22 Mr. Guo?

23 A. No, I don't believe so.

24 Q. Well, when you said "big budget is ready for this long-term  
25 project," you heard that information from Mr. Guo, didn't you?

L4LPEAS1

Wang - Cross

1 A. Not only from him.

2 Q. I'm sorry, who else did you learn that from?

3 A. The people who are persecuted by the Chinese government.

4 Q. And those are the people who would be receiving the  
5 research?

6 A. They are the people that would like to join the research,  
7 potentially, after Strategic Vision deliver the reports.

8 Q. You agree that big budget is ready for this long-term  
9 contract was told to you by Mr. Guo?

10 A. Not only by him.

11 Q. You didn't mention these other people before when we asked  
12 you the question at your deposition, did you?

13 A. Say your question again?

14 Q. Let's just pull it up. Let's just pull up -- you know, you  
15 don't have it. Let's pull up the first deposition. Go to page  
16 258. Actually, let's just move on, just move forward.

17 Now, you claim that it was Mr. Guo who arranged the  
18 payment from ACA, correct?

19 A. It was Mr. Guo told me, I believe.

20 Q. Let's pull up R59. Actually, we'll go to page 64. Okay.  
21 Let's go to the bottom of 63, 22. I asked you: "So is it  
22 Eastern Profit's position that -- let me back up. Is it  
23 Eastern Profit's position that you are to handle negotiations  
24 or discussions with ACA regarding the million dollar loan?

25 "A. In my understanding, from the moment I knew the loan, I

L4LPEAS1

Wang - Cross

1 should help Eastern to handle everything."

2 Did I read that right?

3 A. Sir, you are off screen. Which line are you talking?

4 Q. I'm sorry. Bottom of 63, start at line 22. Okay?

5 THE COURT: Can you enlarge it, maybe highlight what  
6 you want the witness to focus on and what you want the Court to  
7 focus on?

8 And, Ms. Wang, if you can't see what you're being  
9 shown, just let us know you can't see it and counsel will make  
10 it larger for you to see.

11 Q. Okay. I'm afraid she can't do it because of this, the  
12 format. So I'm just going to go slowly. I'll tell you the  
13 line we're going to start on, okay?

14 A. Yes.

15 Q. So we'll try this again. 63, line 22. This is your first  
16 deposition -- or your second deposition. You're under oath  
17 here, correct?

18 A. Correct.

19 Q. Okay. "Okay. So is it Eastern Profit's position that --  
20 let me back up. Is it Eastern Profit's position that you are  
21 to handle negotiations with ACA regarding the million dollar  
22 loan?" Did I read that correctly so far?

23 A. You read correctly, sir.

24 Q. Then you said: "In my understanding, from the moment I  
25 knew the loan, I should help Eastern to handle everything."

L4LPEAS1

Wang - Cross

1 Did I read that correctly?

2 A. You did it correctly, sir.

3 Q. And then question on line 7: "From the first time you  
4 learned of the loan, you believed it was your responsibility to  
5 handle issues regarding the loan?

6 "A. Yes."

7 Did I read that right?

8 A. You did it great.

9 Q. Okay. And then:

10 "Q. And you first learned of the loan sometime in 2018, right?

11 "A. Yes."

12 Did I read that correctly?

13 A. Correct.

14 Q. Okay. That testimony was truthful?

15 A. Correct.

16 Q. Now, you testified to a meeting you had with William Je or  
17 William Yu in the fall of 2018, correct?

18 A. I beg your pardon?

19 Q. Do you recall having a dinner with William Yu or William Je  
20 in the fall of 2018?

21 A. Correct.

22 Q. How do you pronounce his name? How do you -- what do you  
23 know William's name to be?

24 A. William Je.

25 Q. Okay. J-e?

L4LPEAS1

Wang - Cross

1 A. Correct.

2 Q. Now, at your second deposition, I think you testified that  
3 you only knew William Yu, and you pronounced it Y-u. Do you  
4 recall that?

5 A. Correct.

6 Q. Is it the same person, just different way to pronounce the  
7 last name?

8 A. The same person, different pronunciations between Cantonese  
9 and Mandarin.

10 Q. Okay. Now, ACA asked for repayment of the loan because the  
11 Strategic Vision contract produced nothing, correct?

12 A. I beg your pardon?

13 Q. ACA asked for repayment of the loan because the Strategic  
14 Vision contract produced nothing, correct?

15 MS. CLINE: Objection, foundation.

16 THE COURT: Overruled.

17 A. ACA ask for payback because Eastern Profit borrough money  
18 from ACA.

19 Q. Let's pull up R66, and you'll see that you were asked at  
20 line 14:

21 "Q. Are they asking for the money back because the term -- the  
22 contract was terminated?

23 "A. Obviously. Obviously, correct, because this contract  
24 produced nothing."

25 Did I read that correctly?

L4LPEAS1

Wang - Cross

1 A. You did it correctly, sir.

2 Q. ACA and Eastern Profit shared the same goals for the  
3 contract; is that right?

4 A. For this investigation project, correct.

5 Q. And you testified that William Je was also being prosecuted  
6 and persecuted by the CCP, correct?

7 A. Correct.

8 Q. And William Je's goal was to take down the CCP?

9 A. Is that a question?

10 Q. Yes.

11 A. Correct, sir.

12 Q. And so ACA was willing to forgive the loan if the results  
13 of the research were effective, correct?

14 A. It depends on ACA's direction on it.

15 Q. Right. But if the results were effective, ACA was willing  
16 to forgive the loan?

17 A. I mean, I guess so, but I cannot talk on behalf of ACA.

18 Q. But that's what you heard from William Je, correct?

19 A. I don't remember that, but probably, yes.

20 Q. William Je wanted to receive the research from the loan --  
21 I'm sorry, from the project, correct?

22 A. I beg your pardon?

23 Q. William Je wanted to receive the research from the project,  
24 correct?

25 A. He want to receive the one million loan back.

L4LPEAS1

Wang - Cross

1 Q. But he also wanted to receive the research, didn't he?

2 A. He didn't mention to me. I don't remember.

3 Q. C23.

4 (Video being played)

5 THE COURT: Let me instruct both counsel that if you  
6 want the Court to focus on deposition testimony, that you  
7 should provide the page and the line and not just play videos;  
8 so that the record reflects what is being shown to the witness.  
9 Otherwise, we just have a big exhibit without any reflection of  
10 what's being shown.

11 MR. GREIM: Right.

12 (Continued on next page)

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L4LKEAS2

Wang - Recross

1 MR. GREIM: We will finish the clip, and I will read  
2 back.

3 (Video playback)

4 BY MR. GREIM:

5 Q. That testimony was truthful when you gave it, wasn't it?

6 A. Correct.

7 MR. GREIM: What we played was Wang's second  
8 deposition, page 4622 to page 4714.

9 BY MR. GREIM:

10 Q. Mr. Je wanted to be repaid the loan with interest, right?

11 A. I believe so.

12 Q. And this loan accrued interest at the rate of \$20,000 a  
13 month, right?

14 A. It's a six months' loan, correct.

15 Q. Well, the loan continued to accrue interest after its  
16 maturity, didn't it?

17 A. I believe so.

18 Q. And it was compounding monthly, right?

19 A. What do you mean compound?

20 Q. Well, after the first month with interest, the \$20,000 was  
21 added to the principal, right, and then the second month would  
22 be 20 percent of the first month's new principal balance; isn't  
23 that right?

24 A. I didn't handle the loan terms by myself. I don't have  
25 personal knowledge about that.

L4LKEAS2

Wang - Recross

1 Q. Well, sometime between the time you learned about this loan  
2 in 2018 and today, serving as the agent of Eastern Profit in  
3 this case, you've never learned what that meant?

4 A. I learned about this agreement. It's a six-month loan.

5 Q. What did Mr. Je tell you? What does he want?

6 A. He want the loan to be paid back.

7 Q. With interest, correct?

8 A. Correct.

9 Q. And so by this point, about 30 months of interest would  
10 have accrued, correct?

11 Well, let me give you the correct math.

12 By this point, about 28 months of interest would have  
13 accrued, correct?

14 A. If the math is correct, yes.

15 Q. Two years and four months?

16 A. Correct.

17 Q. And so the first interest payment was 20,000, but it  
18 increased each month after that, didn't it?

19 A. If the loan agreement say that, yes.

20 Q. So, when is the last time you spoke with Mr. Je about  
21 wanting repayment on this loan?

22 A. A month ago.

23 Q. Okay. Did he tell you what the total principal plus  
24 interest that he's demanding is?

25 A. I don't remember all the detail.

L4LKEAS2

Wang - Recross

1 Q. Has he ever given you anything in writing on the exact  
2 amount he's asking for?

3 A. I don't remember that.

4 Q. So, all of these discussions about repayment are just  
5 happening orally between you and William Je?

6 A. And in person, also.

7 Q. In person. When you spoke to him a month ago, was he  
8 within this jurisdiction?

9 A. Month ago, that was phone call. In person, that was the  
10 testimony I did already.

11 Q. When is the last time you saw William Je in person?

12 A. Before pandemic. 2018.

13 Q. Well, 2018 was well before the pandemic. It doesn't seem  
14 like that now. Was it just before the pandemic, or was the  
15 last time you saw him 2018?

16 A. I believe I saw him 2019, also, yeah. I don't remember  
17 which date, but it's before the pandemic.

18 Q. So you have not seen this man since 2019?

19 A. I didn't see him since the pandemic.

20 Q. Okay, well, the pandemic started in, what, March -- about a  
21 year ago, March of 2020, correct?

22 A. Correct.

23 Q. But did you see him just before that?

24 A. I don't remember clearly.

25 Q. Did you see him after I deposed you in this case the second

L4LKEAS2

Wang - Recross

1 time in October of 2019?

2 A. I don't remember that clearly.

3 Q. So you spoke on the phone, and your testimony is he didn't  
4 give you an exact amount that you had to repay?

5 A. I don't remember that.

6 Q. Have you ever asked him to stop charging \$20,000 a month  
7 interest?

8 A. I didn't. I don't remember that.

9 Q. Well, I'm curious what Eastern Profit thinks it needs to  
10 repay Mr. Je. You just have to pay him back the million  
11 dollars, or do you have to pay him back a million dollars plus  
12 \$20,000 a month compounding monthly since December of 2018,  
13 2017? Which one?

14 A. I believe, based on the loan agreement, should be all of  
15 them, if we win this case.

16 Q. Has Mr. Je ever told you that?

17 A. Told me about what, sir?

18 Q. Let me ask you. You say "if we win this case." If you  
19 don't win this case, is he going to forgive the loan?

20 A. That's his take. I don't know.

21 Q. Has he said that to you?

22 A. No, never. He's asking for payback.

23 Q. Has he sued you for repayment of the loan balance?

24 A. Sued me?

25 Q. I'm sorry. Has he sued Eastern Profit?

L4LKEAS2

Wang - Recross

1 A. I didn't hear about that.

2 Q. I guess I just want to understand the claim of Eastern  
3 Profit here. Is Eastern Profit seeking a million dollars plus  
4 \$20,000 a month since December of 2017?

5 A. Based on the loan agreement, yes.

6 Q. But it sounds like you don't know whether Mr. Je is  
7 actually asking for that much money from you?

8 A. It's clearly in the loan agreement. It doesn't need to be  
9 in the paperwork.

10 Q. So if Eastern Profit prevails, it's going to seek \$20,000 a  
11 month since December of 2017, and ACA is going to walk away  
12 with its million dollars back plus \$20,000 a month?

13 MS. CLINE: Objection. I think Mr. Greim is calling  
14 for a legal conclusion and conflating some issues that makes  
15 the question confusing.

16 THE COURT: You should refrain from speaking  
17 objections.

18 The objection is overruled.

19 THE WITNESS: Can you say your question again?

20 MR. GREIM: I'd like the court reporter to read it  
21 back.

22 THE COURT: Yes, the court reporter may read it back.  
23 If counsel wants the court reporter to read back  
24 something, the proper way to do it is to ask me if the court  
25 reporter would read it back. The court reporter takes my

L4LKEAS2

Wang - Recross

1 direction, not your direction.

2 MR. GREIM: My apologies, your Honor.

3 (Record read)

4 THE WITNESS: I don't believe ACA will walk away from  
5 the principal and interest. I mean, I still have a little  
6 problem to understand the question, but this is what I can tell  
7 you.

8 BY MR. GREIM:

9 Q. Okay. Well, that's fair, and that was -- as I heard my own  
10 question, I used the word "walk away." I shouldn't have done  
11 that.

12 So, if Eastern Profit prevails in this case, it's  
13 going to pay the money it receives, your testimony is, back to  
14 ACA, correct?

15 A. Correct.

16 Q. And so it will pay ACA, ACA will gain the million dollars  
17 back plus \$20,000 a month since the loan was taken out,  
18 correct?

19 A. Correct.

20 Q. William Je asked you about the progress of the lawsuit  
21 after your first deposition, didn't he?

22 A. Correct.

23 Q. Sometime after that first deposition is when you actually  
24 saw the loan agreement itself for the first time, right?

25 A. Correct.

L4LKEAS2

Wang - Recross

1 Q. You hadn't even seen the loan document when you testified  
2 in January of 2019, right?

3 A. I believe so.

4 Q. You were the agent of Eastern Profit, and that was over a  
5 year after the loan was taken out, right?

6 A. I am the agent. I know the loan agreement. Doesn't mean I  
7 have to see the paperwork.

8 Q. And you can't -- well, the first time you saw it was in  
9 your prior counsel's litigation file, correct?

10 A. Correct.

11 Q. And you don't know how Eastern Profit came up with that  
12 document, do you?

13 A. I don't remember that clearly.

14 Q. Well, not only do you not remember, you just don't know, do  
15 you?

16 A. I don't remember that.

17 Q. So did you know at one time where the document came from?

18 A. I don't remember that.

19 Q. Because Eastern Profit didn't keep a copy of the loan after  
20 it was supposedly signed, did they?

21 A. I don't know that detail.

22 Q. That's a pretty important document in this case, isn't it?

23 A. You're right, sir.

24 Q. Is there anyplace where Eastern Profit keeps its financial  
25 records?

L4LKEAS2

Wang - Recross

1 A. I don't have personal knowledge about that.

2 Q. Well, have you heard about it?

3 A. I don't remember that.

4 Q. Who might possibly know the answer to that question?

5 A. I cannot guess, but the principal of Eastern Profit.

6 Q. That's Mr. Han Chunguang. He's the one who knows?

7 I guess you say you don't know, correct?

8 A. I don't know.

9 Q. How about Guo Mei?

10 A. I don't know about that.

11 Q. She's in the U.S., correct?

12 A. Correct.

13 Q. You can talk to her anytime?

14 A. We talk as needed.

15 Q. You didn't get it from her, did you?

16 A. I didn't get it by myself.

17 Q. Let me ask you: How was the research result from Strategic  
18 Vision, had it been what you wanted, how would that have caused  
19 Eastern Profit's assets to have been unfrozen?

20 A. I beg your pardon?

21 Q. If Strategic Vision had provided the research results that  
22 you were looking for, how would that have helped to unfreeze  
23 Eastern Profit's assets in its Hong Kong bank account?

24 A. The successful high quality investigation deliverable  
25 reports with the corrupted Chinese governmental officials,



L4LKEAS2

Wang - Recross

1 corruption, and their illegal criminal assets proof, evidence,  
2 we potentially will be able to get a chance to report to them  
3 to the authorities and have the criminal Chinese governmental  
4 official arrested, in jail, and hopefully the persecuted  
5 company and individual, they could be rescued and saved.

6 Q. Okay. Now, these corrupt CCP officials, they didn't come  
7 in and take the \$80,000 in Eastern Profit's bank account, did  
8 they?

9 A. They are the last 1 percent of Chinese Communist Party  
10 member. They're high-level government official. They are  
11 manipulating and misusing the country's daily machine to do  
12 this. They don't need to do that by their own hands, to answer  
13 your question.

14 Q. Sure. And my question is a little bit different. I  
15 understand what you've said.

16 My question, though, is this: They have not actually  
17 taken the funds out of Eastern Profit's bank account, correct?  
18 They're frozen, they have not been taken from the account; is  
19 that right?

20 A. I believe so. I don't have the personal knowledge about  
21 that.

22 Q. Who knows the answer to that?

23 A. I don't know.

24 Q. Well, who's watching the shop at Eastern Profit?

25 A. I beg your pardon?

L4LKEAS2

Wang - Recross

1 Q. I'm sorry, I shouldn't have done that.

2 Who is watching the affairs of Eastern Profit? Who's  
3 in charge?

4 A. The Eastern Profit principal.

5 Q. So Han Chunguang is monitoring that account in Hong Kong?

6 A. I don't have personal knowledge about that.

7 Q. What's the status of the proceeding in the order that I  
8 showed you earlier today in the high court of Hong Kong, do you  
9 know?

10 A. It's a completely political-driven persecuted by the  
11 Chinese Government and the Hong Kong special district  
12 government.

13 Q. Is the case still going on right now?

14 A. I don't have personal knowledge.

15 Q. Have the assets been unfrozen?

16 A. I don't have personal knowledge.

17 Q. Is Eastern Profit doing anything in the case to unfreeze  
18 its assets?

19 A. Like this investigation? Hire this firm?

20 Q. Well, anything.

21 Let me ask you a better question.

22 Is Eastern Profit doing anything in Hong Kong right  
23 now in the proceeding? Does it have counsel?

24 A. I don't have personal knowledge.

25 Q. Is it making any filings in Hong Kong to try to expose the

L4LKEAS2

Wang - Recross

1 corruption and unfreeze the assets?

2 A. I don't have personal knowledge.

3 Q. Did Eastern Profit hire any lawyers to work with Strategic  
4 Vision in Hong Kong, so they could use the research that  
5 Strategic was going to find?

6 A. There's no research result. Why Strategic -- Eastern  
7 Profit should hire law firm in Hong Kong?

8 Q. So Eastern was waiting to get the Strategic Vision research  
9 before hiring counsel in Hong Kong?

10 A. I don't have personal knowledge, but possible, if there is  
11 real deliverable reports delivered.

12 Q. Now, this loan agreement had a six-month maturity, right?

13 A. Correct.

14 Q. It had to be repaid in June of 2018?

15 A. Say your question again, sorry, sir?

16 Q. It had to be paid in June of 2018?

17 A. I don't remember detail, but if the loan agreement say  
18 that, yes.

19 Q. So did Eastern Profit expect that Strategic would deliver  
20 the research, and you would be able to prosecute the corrupted  
21 officials in time to release the assets to pay back the loan  
22 agreement?

23 A. Correct.

24 Q. Who came up with this plan for Eastern Profit?

25 A. Sorry, sir, what's your question?

L4LKEAS2

Wang - Recross

1 Q. Who devised this plan for Eastern Profit?

2 A. The principal of Eastern Profit.

3 Q. So this was Han Chunguang's plan?

4 A. I'm not quite sure. Could be Mei Guo. Both of them, they  
5 were persecuted. Mei Guo was even in jail in China.

6 Q. But when you spoke to Mei Guo, she didn't even know about  
7 this project, remember?

8 A. She doesn't know Strategic Vision's name.

9 Q. I see.

10 So now your testimony is she knew about the project,  
11 she just didn't know the name of Strategic Vision?

12 A. She was not involved in this project.

13 Q. Okay. So she didn't know about the project, did she?

14 A. I cannot talk on behalf of her.

15 Q. Well, but you did sign interrogatory responses that were  
16 supposed to list the names of people who had knowledge, right?

17 A. Correct.

18 Q. You didn't list her in those responses, did you? We just  
19 looked at them.

20 A. Correct.

21 Q. It was your job to find the people who did have knowledge,  
22 wasn't it?

23 MS. CLINE: Objection. My understanding was the Court  
24 wanted to talk at sidebar about that document.

25 THE COURT: No, no. The objection is overruled.

L4LKEAS2

Wang - Recross

1 THE WITNESS: Sorry?

2 BY MR. GREIM:

3 Q. It was your job to find the people with information, so you  
4 could report them in that document, wasn't it?

5 A. Correct.

6 Q. And Mei Guo was a director of Eastern Profit, right?

7 A. Correct, but she doesn't need to be involved in the  
8 details.

9 Q. She's the sole director and the owner of all the shares of  
10 Eastern Profit, right?

11 A. Correct. But she authorized me.

12 Q. Well, was Eastern Profit doing lots of other activity other  
13 than this project?

14 A. I don't have personal knowledge.

15 Q. So I think your testimony is that Eastern Profit has no  
16 assets it can use at this time, right?

17 A. They were frozen.

18 Q. And Golden Spring is not getting paid for all the work it's  
19 doing here through your time, correct?

20 A. Which Golden Spring?

21 Q. Golden Spring New York.

22 A. Correct.

23 Q. Is Golden Spring -- China Golden Spring being paid for your  
24 time here?

25 MS. CLINE: Objection; relevance.

L4LKEAS2

Wang - Recross

1 THE COURT: Overruled.

2 THE WITNESS: No.

3 BY MR. GREIM:

4 Q. Well, who is paying, then, for the attorneys in this case  
5 for Eastern Profit?

6 MS. CLINE: Objection; relevance.

7 THE COURT: Yes, what's the relevance?

8 MR. GREIM: I'm trying to establish, ultimately, who  
9 it is that is funding this entire matter. I'm trying to show  
10 that there's not really a loan here, that this is somebody  
11 else's money that's paying for everything in this matter.

12 THE COURT: I think you can ask it more directly if  
13 ACA is paying for the defense. I'll permit that question.

14 BY MR. GREIM:

15 Q. Is ACA paying for the defense of this case?

16 THE COURT: Prosecution.

17 Q. Prosecution of this case?

18 A. I don't remember that.

19 Q. Did you know at one time whether it was?

20 A. It's a three years -- no, I don't remember that.

21 Q. I think that question wasn't very clear.

22 So, these lawyers are being paid here to be at this  
23 trial and to do the work in the case, and then there are  
24 lawyers sitting ahead of us who are also being paid, correct?

25 A. Correct.

L4LKEAS2

Wang - Recross

1 Q. And my question is: Is ACA paying these lawyers that are  
2 prosecuting this case for Eastern Profit?

3 A. No.

4 Q. Do you know -- I'm not going to ask you to answer it based  
5 on the Court's instruction. Do you know the answer, though, of  
6 who is actually paying?

7 MS. CLINE: Objection; relevance.

8 THE COURT: I'll permit that question.

9 THE WITNESS: What's your question, sorry?

10 BY MR. GREIM:

11 Q. You said it wasn't ACA that was paying the lawyers for  
12 Eastern Profit, but do you know who it is? And don't answer  
13 who it is; I just want to know whether you have knowledge of  
14 who is paying the lawyers for Eastern Profit.

15 A. Yes, I do.

16 Q. Now, you testified that you told Han Chunguang that he  
17 needed to come up with a million dollars for the deposit for  
18 the research agreement, correct?

19 A. Correct.

20 Q. You told him that sometime in late December 2017?

21 A. Correct.

22 Q. And you knew the amount of the deposit because by that  
23 time, you had taken over the negotiations, correct?

24 A. Correct.

25 Q. And you had a copy of the draft agreement, right?

L4LKEAS2

Wang - Recross

1 A. Correct.

2 Q. And that draft agreement specified \$750,000 per month would  
3 be paid, correct?

4 A. It's paid by deliverable reports.

5 Q. Sure, okay. I understand we have a difference on the  
6 theory, but the agreement itself, regardless of what triggers  
7 the payment, does say that \$750,000 will be paid every month,  
8 doesn't it?

9 A. The payment only be made if there is high quality  
10 deliverable reports, investigation reports.

11 THE COURT: Ms. Wang, would you answer the question.  
12 The question just goes to whether you know what the agreement  
13 says and whether it says what counsel asked you it said.

14 The court reporter can read back the question.

15 (Record read)

16 THE WITNESS: I don't believe that's my term.

17 MR. GREIM: We better pull this up. Let's pull up  
18 DX 4.

19 You know what, let's move on. We won't go through  
20 this.

21 BY MR. GREIM:

22 Q. Did you tell Han Chunguang that he needed to be making  
23 arrangements to pay \$750,000 after the first month of the  
24 agreement?

25 A. No. The investigation was terminated because of a bad



L4LKEAS2

Wang - Recross

1 quality.

2 Q. Okay. Let's go back to the time you asked him to look for  
3 a million dollars. That was in late December 2017, as you just  
4 testified, correct?

5 A. Correct.

6 Q. Did you tell him that he needed to be thinking about where  
7 to find \$750,000 for the first month's payment?

8 A. I don't remember that.

9 Q. Do you think you might have told him?

10 A. I didn't recall.

11 Q. Wouldn't it have been important for Eastern Profit -- you  
12 were the project manager. Wouldn't it have been important for  
13 Eastern Profit to make sure it could pay the first three months  
14 of the contract, \$750,000 each month?

15 A. Correct.

16 Q. But you don't remember telling Han Chunguang to do that, do  
17 you?

18 A. Strategic Vision is able to accept the payment from  
19 anybody. I didn't specifically need to tell Eastern Profit to  
20 take care of the rest of payments.

21 Q. Well, Han Chunguang hadn't actually seen the agreement,  
22 though, had he?

23 A. You mean the research agreement?

24 Q. Right.

25 A. He did not see that.

L4LKEAS2

Wang - Recross

1 Q. So how was he going to know that 30 days in, he may have to  
2 pay \$750,000?

3 A. Strategic Vision can be paid by anybody.

4 Q. Okay. And so how is Han Chunguang -- but you testified it  
5 was Han Chunguang's job to go find a million dollars, right?

6 A. Correct.

7 Q. He went and did that, you testified?

8 A. Correct.

9 Q. Okay. And so didn't you need to tell him that he needed to  
10 get not just a million dollars, but another 750,000 just 30  
11 days out?

12 A. I didn't mention that to him by then.

13 MR. GREIM: Your Honor, I'm getting ready to move on  
14 to a new topic. I don't know if this is a good time for --

15 THE COURT: I think this is a good time for a break.  
16 Just give me one moment.

17 (Pause)

18 THE COURT: Mr. Greim, let me address myself to you,  
19 and then I'll address myself to counsel.

20 The line of examination that I cut off was about the  
21 signing of documents that were submitted to the Court and  
22 whether those documents were not only incorrect, but were  
23 signed with the knowledge that they were incorrect. It raised  
24 obvious Fifth Amendment questions, frankly.

25 My question to you, Mr. Greim, is whether you intend

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Wang - Recross

1 to pursue that line. I'm not going to restrict you from doing  
2 so right now; I'm just asking the question, and my question to  
3 plaintiff's counsel is whether the witness has a personal  
4 lawyer. But, Mr. Greim, what's your answer?

5 Why don't you think about it during the break.

6 Ms. Cline, why don't you think about it, also, during  
7 the break.

8 We're adjourned for ten minutes. Everybody should be  
9 back by, let's call it, 11:15.

10 (Recess)

11 THE COURT: Mr. Greim, with respect to the question I  
12 left you with?

13 MR. GREIM: Yes. I actually had sort of a final  
14 question to pursue, but I don't -- well, I don't want to say  
15 too much, but I do want to pursue it just one step further, and  
16 I'll speak slowly, and, hopefully, there will be a chance to do  
17 something in that time.

18 THE COURT: Why don't we put that off. You'll tell  
19 me, after we excuse the witness, what the question will be, and  
20 then we'll decide whether we need to recall her, and you can  
21 ask other questions.

22 Ms. Cline, does she have a personal counsel?

23 MS. CLINE: Not on standby, your Honor, but we'd like  
24 to look into that.

25 THE COURT: All right.

L4LKEAS2

Wang - Recross

1 Do you have other lines of examination, Mr. Greim?

2 MR. GREIM: I do, I do.

3 THE COURT: Then we will proceed.

4 Ms. Wang, you're reminded that you are still under  
5 oath, and you're obligated to testify truthfully.

6 Mr. Greim, you may proceed.

7 MR. GREIM: We are going to -- oh, by the way, I  
8 wanted to offer before DX 5, which actually was the  
9 interrogatory responses. I failed do that, and I move to admit  
10 those now.

11 THE COURT: Okay. Those are received subject to a  
12 motion to strike.

13 (Defendant's Exhibit 5 received in evidence)

14 BY MR. GREIM:

15 Q. Ms. Wang, please take a look at this document. You'll see  
16 we used this at your January 2019 -- or prior counsel used this  
17 at your January 2019 deposition.

18 MR. GREIM: Scroll on through, if you would, Becka.

19 THE COURT: What is the document you're showing the  
20 witness?

21 MR. GREIM: This is DX 6.

22 Keep going.

23 BY MR. GREIM:

24 Q. You see it's unsigned. Do you see that, Ms. Wang?

25 A. Yes, I did.

L4LKEAS2

Wang - Recross

1 Q. And it's Bates labeled EASTERN 1 through 4, and I will tell  
2 you this was produced -- this is the very first document  
3 produced by Eastern to us in this case.

4 Do you recognize this document?

5 A. Yes.

6 Q. Is this the draft that Guo Wengui handed to you when he  
7 assigned to you to finish the agreement?

8 A. I remember, yes.

9 Q. This is, of course, different from the final version, isn't  
10 it?

11 A. Correct.

12 Q. Let's go to page 3. I want to direct you to the third from  
13 the bottom section that says, "The pricing for ten units." I  
14 want to focus you on this on page 3. It says, "The pricing for  
15 ten units or deliverables for the first stage remains a  
16 constant \$3 million per year, or \$250,000 per month for 12  
17 months."

18 Did I read that right so far?

19 A. Yes.

20 Q. Now, those weren't the final numbers in the final  
21 agreement, were they?

22 A. I don't remember that clearly.

23 Q. Well, let me just see if I can help you.

24 Do you recall that the final agreement was \$9 million  
25 per year, or \$750,000 per month?

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Wang - Recross

1 A. Correct.

2 Q. Then it says, "These units or deliverables may be mixed and  
3 matched as the client requests. As one unit is deleted from  
4 one fish, an extra fish with the equivalent deliverable is  
5 added, as shown in the attached charts."

6 Did I read that correctly?

7 A. You did, yes.

8 Q. And was that concept retained in the final agreement?

9 A. I believe so.

10 Q. And then let's look at the final sentence. "Such payments  
11 will be made following receipt of the agreed-upon number of  
12 reports per month."

13 Did I read that correctly?

14 A. Reports, yes.

15 Q. Did that statement remain in the final agreement?

16 A. I don't remember the precise words, but payment go by  
17 reports, correct.

18 Q. Well, that sentence was not kept in the final agreement,  
19 was it?

20 A. I don't remember that precisely.

21 Q. Well, we don't --

22 A. We can pull it out.

23 Q. Let's pull it out. Let's look at DX 4 and keep this one  
24 handy.

25 Let's look at page 4, the middle of the page. It

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Wang - Recross

1 says, "The pricing for 30 units." Do you see it says, "The  
2 pricing for 30 units or deliverables per year remains a  
3 constant \$9 million per year, or \$750,000 per month for 12  
4 months"?

5 Did I read that right?

6 A. Yes, sir.

7 Q. And then it goes on and says, "These units or deliverables  
8 may be mixed and matched as the client requests."

9 Did I read that right?

10 A. Correct.

11 Q. "As one unit is deleted from one fish, an extra fish with  
12 the equivalent deliverable is added, as shown in the attached  
13 charts."

14 Did I read that part right?

15 A. Correct.

16 Q. That last sentence is gone, though, isn't it?

17 A. That's the reason why I ask you to pull up.

18 Q. Yes, fair enough.

19 So you don't see it there, do you?

20 A. Correct.

21 Q. So let's go back to the last exhibit, back to DX 6.

22 So, the statement that was pulled out from the draft  
23 was a statement that, "Such payments will be made following  
24 receipt of the agreed-upon number of reports per month,"  
25 correct?

L4LKEAS2

Wang - Recross

1 A. You read it correctly.

2 Q. All right.

3 And, by the way, on this draft, Eastern Profit is not  
4 yet identified as the signatory, is it? We can go to the top  
5 just to confirm that.

6 A. Correct.

7 Q. Now, the parties in this case have given lots of testimony  
8 about the negotiations, and I'm going to ask you now a few  
9 questions about that.

10 Ms. Wang, do you remember that the final dispute on  
11 this contract was over the so-called waterline concept?

12 A. Waterline fish. That was the terms Ms. Wallop gave to us.

13 Q. And do you recall that that was the final dispute that had  
14 to be resolved on this contract?

15 A. It's one of the dispute.

16 Q. Okay, fine. Was it one of the final ones that was  
17 resolved?

18 A. Sorry, what's your question?

19 Q. Was it one of the final disputes that was resolved?

20 A. Correct.

21 Q. And Mr. Guo wanted an a la carte payment system, correct?

22 A. I don't remember that clearly.

23 Q. He wanted payments, payment per a report?

24 A. That was my negotiation with Ms. Wallop.

25 Q. Okay, okay, fair enough. That's what you wanted. Is that



L4LKEAS2

Wang - Recross

1 what Mr. Guo wanted, too?

2 A. He agreed with me.

3 Q. And Ms. Wallop wanted a monthly payment or waterline,  
4 correct?

5 A. Correct.

6 Q. Now, the final agreement, you testified before, was for a  
7 three-month mandatory payment with a recap after three months,  
8 correct?

9 A. Correct.

10 Q. And that was the truth, right?

11 A. That was said in the contract.

12 Q. Now, let's explore the waterline concept for a second.

13 Ms. Wallop insisted on mandatory monthly payments in  
14 order to keep teams in the field, right?

15 A. Correct.

16 Q. And that's what was ultimately agreed to, isn't it?

17 A. That was need to be approved that they are qualified team.

18 Q. So the agreement said that the reports had to be approved  
19 before payment?

20 A. I beg your pardon?

21 Q. The agreement said that the reports had to be approved  
22 before payment?

23 A. The reports has to be reported and reviewed with the  
24 clients with high quality of investigation result, then the  
25 payment can be made.

L4LKEAS2

Wang - Recross

1 THE COURT: Mr. Greim, I think you may have misspoken,  
2 but I think the witness said that the teams had to be approved,  
3 that they were qualified teams. You asked about reports having  
4 to be approved.

5 MR. GREIM: Yeah, I wonder if that wasn't -- thank  
6 you, your Honor.

7 BY MR. GREIM:

8 Q. So, Ms. Wang, are you testifying that the teams themselves  
9 had to be approved by Eastern Profit as well, not just the  
10 reports?

11 A. The team has to justify their performance by the reports.

12 Q. I see.

13 So, what was being -- under your testimony, Eastern's  
14 belief is that the reports had to be reviewed in order to  
15 justify payment?

16 A. The report has to be presented and reviewed, approved to be  
17 qualified, yes.

18 Q. Okay. And so your testimony is that Eastern would review  
19 the report, and then get back to Strategic and say, approved or  
20 not approved, right?

21 A. Strategic Vision are supposed to present a report to the  
22 agents of Eastern Profit, like me, and Mr. Guo will help  
23 review, also.

24 Q. How about Lianchao Han, is he one of the agents?

25 A. I have no personal knowledge.

L4LKEAS2

Wang - Recross

1 Q. Well, have you heard that he's one of the agents?

2 A. I have no personal knowledge.

3 Q. Now, I understand you have no personal knowledge. My  
4 question is: Did you hear from anyone else that Mr. Lianchao  
5 Han was one of the people to whom Strategic could report?

6 A. I didn't recall.

7 Q. You just don't know either way?

8 A. Correct.

9 Q. Now, who, ultimately, then, had to approve the quality of  
10 the reports before payment would be released under your  
11 understanding?

12 A. The agents of Eastern Profit, and the person obviously is  
13 able to justify and review.

14 Q. So you said it's Guo Wengui and yourself, for sure, right?  
15 Those are two agents, correct?

16 A. I'm the agent, yes.

17 Q. Guo Wengui is an agent of Eastern Profit as well, isn't he?

18 A. I don't know whether he has paperwork, but he is supposed  
19 to review, also, because he has the knowledge.

20 Q. And he was the one who was going to use the research,  
21 correct?

22 A. He is one of them, yes.

23 Q. So, ultimately, you testified that a compromise was reached  
24 between the a la carte system and what Ms. Wallop was asking,  
25 the flat fee, correct?

L4LKEAS2

Wang - Recross

1 A. We got agreement, yes.

2 Q. And that compromise was that for the first three months of  
3 this agreement, in your understanding -- January, February, and  
4 March -- the payment of 750,000 U.S. dollars would be wired to  
5 Strategic's U.S. bank account, and then after that, there would  
6 be a recap term; is that right?

7 A. After qualified report were delivered, yes.

8 Q. Well, let's pull up -- you testified on this before, didn't  
9 you? You've been asked this question before?

10 A. Correct.

11 Q. And you testified truthfully at that time?

12 A. Yes.

13 MR. GREIM: Let's play R54, or I guess show it.

14 THE COURT: Please, the exhibit number, page, and  
15 line, and let plaintiff's counsel know, also, what you're going  
16 to be showing the witness.

17 MR. GREIM: Sure.

18 We're going to show Wang's first exhibit -- I'm sorry,  
19 first deposition, page 56, 9 to page 58, 18.

20 BY MR. GREIM:

21 Q. You'll see you were asked --

22 MR. GREIM: I'm going to go to 56; we're actually  
23 going to start at line 4. It should be in the January 31, 2019  
24 deposition. It should be on page 56.

25 THE COURT: 56, 4 to 58, 15; is that right, counsel?

L4LKEAS2

Wang - Recross

1 MR. GREIM: Well, actually -- yes, it will be 56, 4  
2 and then, yes, to 58, 18.

3 BY MR. GREIM:

4 Q. And you will see you were asked at line 4:

5 "Q. And the negotiations, what did they lead to? What was the  
6 final agreement, in your view?

7 "A. We had, I remember, we had totally three meetings and, by  
8 the end, compromised."

9 Did I read that right so far?

10 A. Correct.

11 Q. Answer on line 9:

12 "Q. How did you compromise? Is it reflected in the final  
13 agreement?

14 "A. Correct."

15 Line 12:

16 "Q. Why don't you pull out the final agreement and show me  
17 where that compromise is reflected? It's Exhibit 2.

18 "A. So you want me to explain what is the compromise?

19 "Q. Well, I asked you whether the compromise -- you said there  
20 was a compromise, and I asked you if it was in the final  
21 agreement. I believe you said yes?

22 "A. Yes, I said that."

23 Did I get that correctly so far?

24 A. You read it correctly.

25 Q. All right. And then another question was asked:

L4LKEAS2

Wang - Recross

1 "Q. Now you've got the final agreement in front of you, and I  
2 would like you to point out where it is reflected."

3 And then you see that the court reporter typed in:  
4 "Witness peruses document." That means you looked at it.

5 And then you see now 57, line 2, you say:  
6 "A. Yes, it's on page 4. If you see second paragraph, it is  
7 agreed by both parties that for the first three months of this  
8 agreement - January, February, and March 2018 - that the  
9 payment of \$750,000 will be wired per our instruction to our  
10 U.S. bank account, and after that, there is a recap term.

11 "What is the recap? Oh, yes, it is also agreed by both  
12 parties that after the March reports and the payments are made,  
13 that all involved parties will meet to recap the accounting."

14 Did I read that right so far?

15 A. You read it correctly.

16 Q. When you were answering, you were looking directly at the  
17 research agreement, right?

18 A. Correct.

19 Q. Question:

20 "Q. What does that mean, in your view? What is your  
21 understanding of that term?

22 "A. That means in the very beginning, Strategic Vision, I mean  
23 Mrs. Wallop, requested \$750,000 per month for 12 months, and  
24 obviously the client, I mean Mr. Guo, they don't like that, and  
25 they didn't agree.

L4LKEAS2

Wang - Recross

1 "Q. They did or did not agree?

2 "A. They did not. So the compromise here is that recap.

3 Finally, Mrs. Wallop advised or stressed it for the first three  
4 months, please pay \$750,000 per month, and after the first  
5 three months, by the end of March, let's recap. See, so you  
6 guys still pay me 750,000, or there's a lower or higher, she  
7 called, waterline."

8 Did I read that correctly so far?

9 A. You read it correctly.

10 Q. And was that truthful when you gave it?

11 A. I was giving you what I was told by Mrs. Wallop, and then  
12 compromise means we finally get agreement.

13 Q. My only question is were you answering truthfully in this  
14 testimony?

15 A. I always.

16 Q. So let's go on to line 6:

17 "Q. So the agreement for the first three months, it was going  
18 to be 750,000 for January, 750,000 for February, and 750,000  
19 for March, right?

20 "A. Correct."

21 And then there's an objection from your counsel, and  
22 then you say, "Waterline."

23 Did I read that correctly?

24 A. Correct.

25 Q. Now, the agreement did require \$750,000 per month, didn't

L4LKEAS2

Wang - Recross

1 it?

2 A. With deliverable reports, yes.

3 Q. Let's go on. Let's look at page 58, line 19:

4 "Q. How about the -- what is your understanding of the fourth  
5 paragraph down, 'The pricing for 30 units or deliverables per  
6 year remains a constant \$9 million per year, or \$750,000 per  
7 month for 12 months'?"

8 Did I read that right so far?

9 A. Correct.

10 Q. By the way, that's the language we just looked at a second  
11 ago, isn't it, when we were comparing the draft agreement with  
12 the new agreement? We just looked at that language, didn't we?

13 A. We did.

14 Q. And your answer was 24, line 24, page 58:

15 "A. You were pointing the correct point. This is Mrs. Wallop  
16 called waterline, which she is able to maintain her  
17 investigation team waterline, and she said that this is  
18 mandatory. That is if you want this project, you have to pay  
19 minimum to keep waterline."

20 Did I read that right?

21 A. This is what I told -- what I was told.

22 Q. Did I read that correctly?

23 A. You did.

24 Q. Question:

25 "Q. In other words, that, in part, encompassed what it was



L4LKEAS2

Wang - Recross

1 going to cost Strategic Vision to keep teams out in the field  
2 and available in order to do the work for Eastern Profit,  
3 right?"

4 Answer on line 9 now, 9, 11:

5 "A. Based on her explanation, she said, yes, that is  
6 professional, and that is a mandatory request.

7 "Q. And that ended up in the final contract?

8 "A. Correct."

9 Did I read that correctly?

10 A. Correct.

11 THE COURT: Ms. Wang, were those answers truthful?

12 THE WITNESS: This is what I was told, your Honor.

13 THE COURT: Did you testify truthfully in your  
14 deposition?

15 THE WITNESS: Correct.

16 BY MR. GREIM:

17 Q. We're going to shift gears here a little bit, Ms. Wang, and  
18 go back to some of the questions that Eastern's counsel asked  
19 you about your background.

20 Now, she asked you about your educational background.  
21 Do you recall that?

22 A. Yes, I do.

23 Q. Did you give a complete answer of your college and above,  
24 your education from college and above?

25 A. I did not.

L4LKEAS2

Wang - Recross

1 Q. Okay. What did you leave out?

2 A. I cannot give that information.

3 Q. Why not?

4 A. Because all information will become to be public, the  
5 Chinese Communists is going to come after me, and my  
6 personally, and my family. I'm protecting my privacy.

7 Q. Ms. Wang, did you go to the People's Liberation Army  
8 Foreign Language Institute at Luoyang?

9 A. It's ridiculous. Never. Never.

10 Q. Where did you go before you went abroad to Switzerland?

11 A. I cannot tell you.

12 Q. Where did you go to school in China?

13 A. I cannot tell you either.

14 Q. Where did you get your college degree in China?

15 A. I cannot tell you.

16 Q. How is disclosing that information here going to somehow  
17 cause CCP retaliation against you or others?

18 A. I beg your pardon? What's the question?

19 Q. I guess I just want to understand how telling us the place  
20 where you received your training before you went to  
21 Switzerland, how that will cause CCP retaliation against you.

22 A. I never heard about this. This is ridiculous.

23 Q. Well, I'm sorry, maybe I don't understand the reason that  
24 you aren't going to tell us the answer.

25 Why are you not telling us where you were trained in

L4LKEAS2

Wang - Recross

1 China before you went to study international relations abroad?

2 A. I was never trained by the CCP, period.

3 Q. What is the place where you went to school?

4 A. I cannot tell you.

5 Q. Was it on the Mainland?

6 A. I cannot tell you.

7 Q. Where did you grow up?

8 MS. CLINE: Objection; relevance, your Honor.

9 THE COURT: You asked about education and her  
10 background, so I think it's fair cross-examination. He's not  
11 directing the witness to answer the questions other than to  
12 give the answers that she's given. If there's an application  
13 with respect to it by either side, I'll hear counsel after the  
14 line of examination is done.

15 You may proceed, Mr. Greim.

16 BY MR. GREIM:

17 Q. Where did you grow up in China?

18 A. In Mainland China.

19 Q. I'm sorry, where?

20 A. Mainland of China.

21 Q. And did you get your college education on the Mainland of  
22 China?

23 A. I cannot tell you.

24 Q. Did you receive training in foreign languages in Mainland  
25 China?

L4LKEAS2

Wang - Recross

1 A. I cannot tell you.

2 Q. And the basis is fear of persecution?

3 A. The basis is to protect the persecution against the --  
4 protect my family against persecution, and myself. All of this  
5 answer is going to go to public, period.

6 Q. But if you were not trained by -- I don't understand how  
7 the answer to this question -- and just tell us, tell the  
8 Court, how your answer to this question will expose your family  
9 to persecution.

10 A. What's your question?

11 Q. I'd ask you to tell us why answering where you received  
12 your training in China will expose your family to persecution.

13 A. My family, they were already arrested. They are still in  
14 jail. If I tell you my school, my college, how you know the  
15 Chinese Government is not going to go after my classmates, my  
16 professor, my teacher?

17 Q. Did you receive any intelligence training in China?

18 A. Never.

19 Q. Is that the truth?

20 A. Of course.

21 Q. As of 2017, you had spent most of the last 16 years working  
22 in Hong Kong, correct?

23 A. You mean 16 years in Hong Kong?

24 Q. Correct.

25 A. I cannot tell you.

L4LKEAS2

Wang - Recross

1 Q. Well, in 2017, you had been in the United States for about  
2 two years, correct?

3 A. Almost.

4 Q. And when you came to the U.S., where did you come from,  
5 Hong Kong or the Mainland?

6 A. From Mainland.

7 Q. And you spent many years working in Hong Kong, did you not?

8 A. I cannot tell you.

9 THE COURT: Are you refusing to answer that question?

10 THE WITNESS: Yes, your Honor, if I can.

11 BY MR. GREIM:

12 Q. What is the reason you're refusing to answer?

13 A. Protect my family, my colleague, and people around me.

14 Q. Well, you've already testified that you worked for China  
15 Golden Spring in Hong Kong, correct?

16 A. Correct.

17 Q. How many years were you working for China Golden Spring in  
18 Hong Kong?

19 A. A couple of years.

20 Q. What do you mean, two or three or more like five or ten?

21 A. Two to three.

22 Q. Were you working somewhere in Hong Kong before that?

23 A. I cannot tell you.

24 Q. I think it's fair to say - tell me if you disagree from  
25 your testimony - that your testimony is that the CCP has

L4LKEAS2

Wang - Recross

1 substantial influence, if not control, over Hong Kong, correct?

2 A. What's your question? Sorry?

3 Q. Well, is it your testimony that the CCP has at least  
4 substantial influence over Hong Kong?

5 A. Correct.

6 Q. I guess we should probably differentiate because of the  
7 recent events.

8 Let's go from -- during the time you were there, did  
9 the CCP have substantial influence over Hong Kong?

10 A. CCP start to have influence from 1997 to Hong Kong.

11 Q. And is one of the ways in which the CCP exerted its  
12 influence in Hong Kong through patriotic groups?

13 A. Sorry, what's your question?

14 Q. Is one of the ways in which the CCP exerted its influence  
15 in Hong Kong through patriotic groups?

16 A. I don't understand your question.

17 (Continued on next page)

L4LPEAS3

Wang - Cross

1 Q. Have you -- so have you ever heard of a concept in Hong  
2 Kong of groups that are called patriotic groups?

3 MS. CLINE: Objection, relevance.

4 THE COURT: Overruled.

5 A. I don't remember this.

6 Q. You never heard that term before?

7 A. I mean, there are so many group in Hong Kong, I do not  
8 recall.

9 Q. How did the CCP assert its influence in Hong Kong after  
10 1997, during -- let's just say during the time you were there?  
11 How did it assert its influence?

12 A. For example, CCP change the basic laws of Hong Kong, right?  
13 CCP mandatory request all the Hong Kong case to learn Mandarin  
14 on top of Cantonese. There is many way.

15 Q. Did it do it through private groups?

16 A. I mean, I am not CCP. I cannot tell. What do you mean  
17 "private groups"?

18 Q. Okay. Well, let's go to that question. You were CCP for  
19 most of your life, you testified, until, you said,  
20 January 2017, right?

21 A. I was misled, and I was requested by CCP, when I was known  
22 nothing about CCP, by them.

23 Q. But you were a member of the CCP until January of 2017,  
24 right? That was your testimony?

25 A. My testimony is until the beginning of 2015.

L4LPEAS3

Wang - Cross

1 Q. I see. So actually -- so you left the CCP at the beginning  
2 of 2015?

3 A. What do you mean "left"?

4 Q. Well, I guess I ask you that question. When did you --  
5 when were you no longer a member of the CCP?

6 A. To recall back from 2015, I left the country. I never came  
7 back, and then from 2017 we started this whistleblowing  
8 movement. We officially go against the CCP.

9 Q. So is it your testimony that after you joined the  
10 whistleblowing movement, you were no longer a member of the  
11 CCP?

12 A. Before I joined.

13 Q. So you quit the CCP first, then you joined the  
14 whistleblowing movement?

15 A. I quit CCP since I left the country because I never came  
16 back again.

17 Q. And so when did you join the whistleblowing movement?

18 A. The whistleblowing movement started officially from  
19 beginning of 2017.

20 Q. And you are certain that you were no longer a member of the  
21 CCP at that time, right?

22 A. As for the fact, the facts, correct.

23 Q. Well, what do you mean by "as for the facts"? In some  
24 sense were you still a member of the CCP?

25 A. I am not a member of CCP, but to protect my family, who are



L4LPEAS3

Wang - Cross

1 in jail and arrested, I have to fight and protect them at the  
2 same time.

3 Q. We'll come back to that in a second. Let me go back to my  
4 last line of questioning, though, here. So you were a member  
5 of the CCP while you were in Hong Kong, correct?

6 A. When I was in Hong Kong, which year?

7 Q. Well, before you came to the U.S., when you were in Hong  
8 Kong, you were a member of the CCP, right?

9 A. Before 2015, correct.

10 Q. And as a member of the CCP in Hong Kong, you weren't aware  
11 of any associations, private associations, of people who  
12 coordinated with the CCP?

13 A. Sir, no. Even I was CCP before, I was very, very inactive.  
14 I have no idea what they doing about their party things.  
15 That's the thing why I didn't agree, right, completely at all.  
16 I don't have that knowledge.

17 Q. How about the Hong Kong Federation of Youth Groups, have  
18 you ever heard of that?

19 A. Yes.

20 Q. That's a patriotic group, isn't it?

21 A. I'm not familiar with this group, but I've heard the name.

22 Q. And that's a CCP-affiliated group, isn't it?

23 A. I have no idea.

24 Q. You don't know either way?

25 A. I did not involve in the CCP activity from the beginning

L4LPEAS3

Wang - Cross

1 until end, until I cut off. I'm not an inactive member. I  
2 don't join their activities.

3 Q. You were living in Hong Kong, though, correct, while you  
4 were working for Chinese Global Spring?

5 A. I lived in Hong Kong, correct.

6 Q. And you were just unaware whether the Hong Kong Federation  
7 of Youth Groups was pro or anti CCP, just didn't know?

8 A. Sir, I live in Hong Kong. It doesn't mean I have to know  
9 all of their things. Especially I am never an active CCP  
10 member at all.

11 Q. How about the Hong Kong Volunteer Corps? Does that ring a  
12 bell? Have you ever heard of that before?

13 A. I'm not quite familiar.

14 Q. Now, Ms. Wang, isn't it true that you were, in fact, still  
15 a member of the CCP well into 2017?

16 A. I beg your pardon?

17 Q. Isn't it a fact that you were still a member of the CCP  
18 well into 2017?

19 A. I said that to protect my family, and then I have to  
20 protect them. I cannot just like stand in front of a camera  
21 and say that I cut off CCP when my family still in jail. Okay?  
22 Which means if I have to say something, then I have to protect  
23 my family. That's the whole reason. I cannot sit there, in  
24 front of a camera and looking at them in the eyes in jail,  
25 period.

L4LPEAS3

Wang - Cross

1 Q. So you went on Mirror Media in New York, didn't you, in  
2 August of 2017 for an interview?

3 A. Correct. Right after my husband was arrested and jailed.

4 Q. And you proclaimed on that that you were part of the  
5 whistleblower movement, didn't you?

6 A. Correct.

7 Q. But you also said to the host that you were still a CCP  
8 member, didn't you?

9 A. I did. My husband in jail, and they are connecting with  
10 China, that's it.

11 Q. So saying you were part of the whistleblower movement was  
12 okay, and that was not a danger to your husband, right?

13 A. I hope not, but he had already in jail.

14 Q. But you had to lie about whether you were a CCP member?

15 A. I did not lie at all.

16 Q. So were you a CCP member?

17 A. I am not.

18 Q. At the time, in August of 2017, when you gave your  
19 interview, were you a CCP member?

20 A. In effect, I was not. I was interviewed by a CCP-connected  
21 media, which I know that video is going to go to CCP. What do  
22 you want me to say in front of them? With your husband in  
23 jail, you tell me?

24 Q. You told them that you were a whistleblower in that  
25 interview?

L4LPEAS3

Wang - Cross

1 A. Correct, I am.

2 Q. What's the Chinese People's Political Consultative  
3 Conference?

4 A. What's your question?

5 Q. What is it?

6 A. What's your question?

7 Q. What is the Chinese People's Political Consultative  
8 Conference?

9 A. It's a conference.

10 Q. CPPCC.

11 A. Yes, it's a conference.

12 Q. What do they do?

13 A. From Google and Wikipedia, of course, they organize the  
14 committee and manage the country.

15 Q. And they're appointed by the CCP, aren't they?

16 A. Correct.

17 Q. And you would never associate with a member of the CPPCC,  
18 would you?

19 A. Never. They are the people we investigate.

20 Q. Right. They couldn't be a member of the whistleblower  
21 movement, could they?

22 A. I don't have personal knowledge, but it's possible.

23 Q. You wouldn't take money from them, would you?

24 A. Me? Never. Why?

25 Q. You wouldn't allow funding for any Eastern Profit's

L4LPEAS3

Wang - Cross

1 projects to be controlled by a member of the CPPCC, would you?

2 A. I beg your pardon?

3 Q. You wouldn't allow funding for any of Eastern Profit's  
4 projects to be controlled by a member of the CPPCC, would you?

5 A. CPPCC member, no. They will not control this project.

6 Q. Why not?

7 A. They're our enemies. That's it.

8 Q. How much do you know about William Je?

9 A. What's your question?

10 Q. What do you know about William Je?

11 A. How much, right? Not too much.

12 Q. Do you trust him?

13 A. I trusted him as a CCP fighter also together.

14 Q. He's the person who released the million dollars to  
15 Strategic Vision on behalf of ACA, isn't he?

16 A. I found out, yes.

17 Q. Would it shock you to learn that William Je was a member of  
18 the CPPCC?

19 A. What's your question?

20 Q. Would it shock you to learn that William Je is a member of  
21 the CPPCC?

22 MS. CLINE: Objection, your Honor. It assumes facts  
23 in evidence and lacks foundation.

24 THE COURT: What's the good-faith belief, counsel?

25 MR. GREIM: Well, your Honor, it's the LinkedIn page

1 of William Je that's been excluded as an exhibit, but it's  
2 findable by anyone.

3 THE COURT: Thank you. I'll permit the questions.

4 A. Mr. Greim, there is 90 million of the CCP member in  
5 mainland China. As I have defined yesterday, 99.9 percent of  
6 them, they are common, average workers. They are people works  
7 to support for their life, pay their tax. They are good  
8 people. So if you are saying, found William Je as a member, or  
9 whatever, it doesn't mean that he is CPP. He is actually  
10 across with them. He is not. He is fighting against the CCP.  
11 That's it.

12 THE COURT: Would you answer, though, the question  
13 that you were asked?

14 Can the court reporter read back the question that  
15 starts with "would it shock you"?

16 (Record read back)

17 A. I'm not.

18 Q. Why is that not surprising?

19 A. CCP threatens many people. Why should it surprise me or  
20 shock me?

21 Q. I'm going to show you the page that we, I'll just tell you,  
22 found on the internet. Okay? A LinkedIn page. Now, first of  
23 all, there is a little circle with a picture of a man in the  
24 upper left-hand corner.

25 THE COURT: What exhibit are you showing?

L4LPEAS3

Wang - Cross

1 MR. GREIM: This is DX49, your Honor.

2 THE COURT: Not in evidence?

3 MR. GREIM: Not in evidence, and on a motion in limine  
4 it's been excluded. I just want to make that clear.

5 BY MR. GREIM:

6 Q. Now, do you recognize the man in that picture?

7 A. It's very blur, to be honest. I couldn't.

8 Q. You've met with William Je many times, haven't you?

9 A. We met as needed.

10 Q. He's been to New York to see you here many times?

11 A. We met as needed.

12 Q. And you introduced him to people who you care for, don't  
13 you?

14 A. What do you mean I "care for"?

15 Q. Well, Karin Maistrello was one of your employees at Golden  
16 Spring New York, right?

17 A. She was before.

18 Q. At the time when you only had about ten or twelve  
19 employees?

20 A. What's your question?

21 Q. Karen Maistrello was your employee at Golden Spring  
22 New York when you only had ten or twelve employees?

23 A. Close, yes.

24 Q. And you introduced her to William Je, did you?

25 A. I did not specifically do that.

L4LPEAS3

Wang - Cross

1 Q. Do you deny that you introduced her to William Je?

2 A. I don't recall.

3 Q. On one of his meetings to New York?

4 A. I didn't recall.

5 Q. You're the reason that she got named as the director of  
6 ACA, aren't you?

7 A. What's your question?

8 Q. You're the one who introduced her to William Je so that she  
9 could get named as a director of ACA, aren't you?

10 MS. CLINE: Objection, relevance.

11 THE COURT: Overruled.

12 A. William came to my office sometime; so who he met, I don't  
13 remember. I was in there or not, but he was in our office  
14 before.

15 Q. So if Karin Maistrello testified that you introduced her to  
16 William Je, would you disagree with that, or you just don't  
17 remember?

18 A. Possible. I don't remember clearly.

19 Q. All right. Now, we zoomed in as close -- and you would  
20 recognize William Je if he were to walk into this courtroom  
21 here, wouldn't you?

22 A. Correct.

23 Q. And your testimony is you can't tell if that's him?

24 A. Sir, it's very blur. You can see that.

25 Q. Okay.



L4LPEAS3

Wang - Cross

1 A. With the sunglasses on his face or her face.

2 Q. Let me ask you, do you know whether he was chairman of  
3 Equity Capital Markets in Macquarie?

4 MS. CLINE: Objection, your Honor. This exhibit has  
5 been excluded.

6 THE COURT: Overruled. It's being used for  
7 cross-examination, not being offered.

8 The question is, do you know or not?

9 THE WITNESS: I have no personal knowledge.

10 BY MR. GREIM:

11 Q. Have you ever tried to learn anything about Mr. Je on the  
12 internet? Have you ever looked for his name?

13 A. No, I didn't.

14 Q. So how do you -- have you done anything to satisfy yourself  
15 that he is friendly to the whistleblower movement and not  
16 controlled by the CCP?

17 A. What's your question? Sorry.

18 Q. Have you done anything to satisfy yourself that he is a  
19 friend of the whistleblower movement and not controlled by the  
20 CCP?

21 A. He joined this project. He loan money to Eastern Profits,  
22 and I know he has family in Hong Kong being persecuted also.

23 Q. Did he tell you that?

24 A. Correct.

25 Q. When did he tell you this?

L4LPEAS3

Wang - Cross

1 A. I can't recall. Years ago, yeah.

2 Q. Let's scroll down a little further. Keep going. Let's  
3 look at his accomplishments or the accomplishments that are  
4 listed on this page. We don't have William Je here. We  
5 haven't asked him if this is his LinkedIn page.

6 Do you see honors and awards? He has, apparently, an  
7 honorary citizenship of Washington State. Did he ever tell you  
8 that?

9 THE COURT: That question, the objection is sustained.  
10 You can ask the question a different way.

11 Q. Did William Je ever tell you that he was an honorary  
12 citizen of Washington State?

13 MS. CLINE: Objection, calls for hearsay.

14 THE COURT: Overruled.

15 A. I don't remember.

16 Q. Did he ever tell you that he was a -- did he ever tell you  
17 that he was in the International Who's Who of Professionals?

18 A. I don't remember that.

19 Q. Did he ever tell you about any connections he had to Chung  
20 King?

21 A. Say that again?

22 Q. Did he ever tell you about any connections he had with  
23 Chung King?

24 A. I couldn't know what name you are talking about.

25 Q. Well, I'm going to spell it for you. I'm not a good

L4LPEAS3

Wang - Cross

1 Chinese speaker. I'm not one at all. C-h-o-n-g-q-i-n-g,  
2 Chongqing?

3 A. Never heard of that.

4 Q. Isn't that a major city in China?

5 A. Oh, Chongqing you're talking about?

6 Q. Chongqing, very good. I hear laughter. I do my best.

7 Has he ever told you about any connection he has to  
8 Chongqing?

9 A. I don't remember that.

10 Q. Well, do you not remember it, or do you think it's possible  
11 he mentioned it to you?

12 A. I don't clearly recall.

13 Q. Did he ever mention being a part of a Hong Kong Chongqing  
14 Friendship Association?

15 A. I don't remember.

16 Q. Did he ever tell you he was a member of the Chinese  
17 People's Political Consultative Conference of Chongqing?

18 A. I don't remember.

19 Q. But he might have, you just can't remember?

20 A. Unlikely.

21 Q. Oh, unlikely. Why is that unlikely?

22 A. Because we barely talk about this. Not our topics.

23 Q. You don't talk about his politics with him?

24 A. Barely, no.

25 Q. Now, you know that Karin Maistrello was a director of ACA

L4LPEAS3

Wang - Cross

1 for some time, right?

2 A. Correct.

3 Q. And do you recall that she received a subpoena to testify  
4 in this case?

5 A. Correct.

6 Q. But in between the time that we sent Golden Spring a notice  
7 of the subpoena and the time she was served, she resigned; is  
8 that right?

9 A. No, not correct.

10 Q. Oh, she did not resign?

11 A. She resigned, but not when Golden Spring receive subpoena.  
12 It's not related.

13 Q. I understand your testimony is just it's a coincidence that  
14 she resigned in between the time Golden Spring received notice  
15 and the time she was served; is that correct?

16 A. There's no relation. She was sick. She went to hospital.

17 Q. Okay. Fair enough. Fair enough. So she -- for whatever  
18 reason, she resigned?

19 A. Oh, she resigned in April, May 2020; so that's the time.

20 Q. So she was still the director of ACA until April of 2020?

21 A. I'm not in the wire tape. I have no idea about that.

22 Q. I'm talking about ACA.

23 A. Oh, I have no knowledge. I'm sorry.

24 Q. And do you know that William Je replaced Karin Maistrello  
25 with someone else when she resigned?

L4LPEAS3

Wang - Cross

1 A. I don't have personal knowledge.

2 Q. Let's pull it up, 126A. Would it concern you if he  
3 appointed somebody at ACA, sole natural person director,  
4 someone on the mainland?

5 A. Why I should be concerned? It's not my business.

6 Q. I'm going to show you what's been filed by your counsel in  
7 this case, a document 203-1. It's a notice of change of  
8 company secretary and director, Karin Maistrello. Let's go  
9 down a little bit. You'll see it happened on July the 26th,  
10 2019. Do you see that?

11 A. I do.

12 Q. And do you recall taking depositions in this case in July  
13 and August of 2019?

14 A. Deposition to who, me?

15 Q. Various witnesses. Yes, you and others?

16 A. I was deposed in January and October of 2019.

17 Q. Let's just keep going. Scroll down, please. You can stop  
18 here.

19 And do you see who Karin Maistrello was replaced with,  
20 someone named Chen Qiaoling?

21 A. Yes, I did.

22 Q. Do you know Chen?

23 A. Never know.

24 Q. And Chen is in mainland China, correct?

25 A. I don't have personal knowledge.

L4LPEAS3

Wang - Cross

1 Q. Well, based on this -- I understand that. Based on this --  
2 by the way, this was attached to the letter Joanna Cline, your  
3 counsel, filed with the Court that you said you reviewed. Do  
4 you remember?

5 A. This is a public record, yes.

6 Q. Okay. And you'll see Guangxi Province is in the People's  
7 Republic of China, correct?

8 A. Correct.

9 Q. Do you have any concern at all that the sole director of  
10 ACA is now in the People's Republic of China?

11 A. I don't know this person. It's not my business. Why I  
12 should be concerned?

13 MR. GREIM: I'd move to offer Exhibit 126A.

14 THE COURT: That's received subject to motion to  
15 strike.

16 (Defendant's Exhibit 126A received in evidence)

17 THE COURT: Any further examination?

18 MR. GREIM: No further, your Honor, other than the one  
19 we mentioned.

20 THE COURT: Okay. Ms. Cline?

21 Just for the parties' edification, after Ms. Cline is  
22 done, we will leave this witness' testimony open for the  
23 purpose of the one question and any colloquy that comes out  
24 of -- any further questions that comes out of that issue.

25 Thank you, Mr. Greim, for wiping off the podium.

L4LPEAS3

Wang - Redirect

1 MR. GREIM: Sure.

2 MS. CLINE: Mr. Chuff, can we bring up, please,  
3 Ms. Wang's first deposition in January 2019.

4 THE COURT: Ms. Cline, you've got to refer to it by  
5 the exhibit number. Give us the page and line number so we can  
6 show the witness and opposing counsel. Thank you.

7 MS. CLINE: Your Honor, I'm not sure we have exhibit  
8 numbers for the deposition, but I can refer to it by date, page  
9 and line number.

10 THE COURT: Okay.

11 REDIRECT EXAMINATION

12 BY MS. CLINE:

13 Q. So this is Ms. Wang's deposition from January 2018, and  
14 I'll be asking her about pages 207 and 208.

15 So, Ms. Wang, you recall Mr. Greim was asking you some  
16 questions about the way the pricing works under the research  
17 agreement, those questions?

18 A. Yes, I do.

19 Q. Okay. And you remember your deposition being taken, right?

20 A. Correct.

21 Q. Okay. So Mr. Greim asked you some questions that were  
22 memorialized earlier in the transcript, but I'm going to ask  
23 you to take a look at page 207, and if you could scroll down to  
24 line 25. And actually keep scrolling to the top of page 208,  
25 please.

1           So there's a question there that says: "If Strategic  
2 Vision performed as you wanted under the contract and they  
3 worked for three months, how much money would they be owed?

4       "A. Zero because they deliver nothing."

5           Do you see that testimony?

6       A. Yes, I do.

7       Q. And was that a truthful answer when you gave it?

8       A. Correct.

9       Q. All right. Mr. Chuff, can we now look at Ms. Wang's second  
10 deposition, October 30th, 2019, and let's shift, I think, to  
11 page 129.

12           Okay. So in October a question was asked of you,  
13 starting at line 6, at page 129: "Now, the research agreement  
14 called for a fee of \$750,000 a month; is that right?

15       "A. 750,000 U.S. dollars based on their weekly reports and  
16 general monthly reports. Without seeing or received the  
17 reports, \$750,000 U.S. dollars should not be paid."

18           Do you see that testimony?

19       A. Yes, I do.

20       Q. Was that truthful when you gave it?

21       A. Correct.

22       Q. And, Mr. Chuff, could you pull up DX6, please.

23           Ms. Wang, do you remember Mr. Greim was asking you  
24 some questions about a draft research agreement?

25       A. Yes.



L4LPEAS3

Wang - Redirect

1 Q. And, Chris, could you scroll to the top so we can orient  
2 the witness?

3 Do you recall he showed you this DX6, which is a draft  
4 of the agreement?

5 A. Correct.

6 Q. Okay. And let's take a look at page 3, please. And  
7 specifically, there's a pricing provision here in the draft,  
8 where it's being highlighted. It says: The prices for each  
9 deliverable, A, B and C, are 300,000 each, per subject (per  
10 "fish") per year. Do you see that provision?

11 A. Yes.

12 Q. And we can pull up the research agreement, if you'd like,  
13 but do you remember whether that price remained in the final  
14 contract or that provision remained in the final contract?

15 A. Correct.

16 Q. And, Mr. Chuff, can we pull up DX21, please.

17 And, Ms. Wang, do you remember that Mr. Greim was  
18 asking you some questions about this text exchange you had with  
19 Mr. Waller?

20 A. Yes.

21 Q. And can we scroll a little bit, please, to the bottom of  
22 the page.

23 And Mr. Greim asked you a number of questions about  
24 this text at the bottom of the first page, where you referred  
25 to the investors. Can you tell us what you meant by "the

1 investors" in the context of this text exchange?

2 A. "The investors" refer to the people who are persecuted by  
3 the Chinese government, and I cannot put their name in there  
4 because there will be a risk in their life.

5 Q. By using the word "investors," did you mean to suggest that  
6 Eastern Profit wouldn't have to pay the money back?

7 MR. GREIM: Objection, leading, your Honor.

8 THE COURT: Overruled.

9 A. Eastern Profit should pay the money back to ACA.

10 Q. You testified, I can't now remember if it was yesterday or  
11 today, about the negotiations for the research agreement with  
12 Mr. Waller and Ms. Wallop. In the course of those  
13 negotiations -- well, let me start again, and I think you said  
14 there were a number of meetings in which the research agreement  
15 was negotiated?

16 A. There were several meetings, yes.

17 Q. Okay. Over the course of those meetings, did Ms. Wallop or  
18 Mr. Waller ever say to you that, from their perspective, it was  
19 a material term of a contract that Mr. Guo be a dissident?

20 A. Sorry? I beg your pardon?

21 Q. Yes. While you were negotiating the contract, did  
22 Mr. Waller or Ms. Wallop ever say to you that it was a material  
23 term of the contract that Mr. Guo be a dissident?

24 A. They specifically did not want Mr. Guo's name shown in the  
25 contract at all. So they pointed it out clearly.

L4LPEAS3

Wang - Redirect

1 Q. Did you and they ever have a discussion about what the term  
2 "dissident" means?

3 A. I don't remember that.

4 Q. Was there ever a text exchange that memorialized what both  
5 parties meant by using the word "dissident"?

6 A. I believe so.

7 Q. You think there was -- I'm asking whether you thought there  
8 was a text exchange where people were talking about what it  
9 means to be a dissident, a definition?

10 A. No, no. That one, never. They specifically asked before  
11 some, like a nickname or some like very discretionary name to  
12 name people dissident.

13 Q. When you told Ms. Wallop that Eastern Profit was going to  
14 be the counterparty to the contract, did she ask you any  
15 questions about that?

16 A. I told her. She didn't ask questions about that.

17 MS. CLINE: Those are all the questions I have, your  
18 Honor.

19 THE COURT: Anything further from the defense?

20 MR. GREIM: Other than the other point, no, your  
21 Honor.

22 THE COURT: Okay. So we're not going to conclude  
23 Ms. Wang's testimony. Ms. Wang is going to be excused.  
24 Ms. Cline, you're going to consult with Ms. Wang about the  
25 issue of obtaining independent separate counsel for her. It

L4LPEAS3

Wang - Redirect

1 should be obvious the reason why I'm leaving the testimony  
2 open. It's for both for the protection of the parties but also  
3 for the protection of the witness.

4 The particular issue that concerns me is the line of  
5 questioning that went to the question of whether Ms. Wang  
6 knowingly and willfully signed a document that was submitted to  
7 the Court that was either incomplete or false and did so  
8 knowing that it was either incomplete or false, to protect  
9 others.

10 That raises obvious questions and questions that will  
11 be obvious to the lawyer with whom she consults. That is the  
12 line of questioning that is being left open, and we'll just  
13 return to this issue after she's had a chance to consult.  
14 Ms. Cline, you'll keep me updated.

15 MS. CLINE: Understood.

16 THE COURT: Who is the next witness? Ms. Wang, you're  
17 excused. Thank you very much.

18 (Witness excused).

19 MR. CHUFF: Your Honor, Eastern calls Han Chunguang.

20 THE COURT: Mr. Chuff, does this witness need an  
21 interpreter?

22 MR. CHUFF: Yes, he does, your Honor.

23 THE COURT: Okay. So we'll take a five-minute break  
24 just for the interpreter to get set up and for the witness to  
25 get set up, and then we'll reconvene at 12:25.

L4LPEAS3

Wang - Redirect

1 (Recess)

2 THE COURT: Be seated. Would you please state your  
3 name of the witness who you're going to call?

4 MR. CHUFF: Yes, your Honor. Han Chunguang.

5 THE COURT: I'm going to ask my deputy to swear both  
6 the interpreter and the witness in a moment.

7 Just a matter with respect to protocol. I understand,  
8 and this is addressed to Mr. Greim, that there is a separate  
9 interpreter who is checking the interpretation of the  
10 interpreter, who will be sworn; is that correct, Mr. Greim?

11 MR. GREIM: That is correct, your Honor.

12 THE COURT: In terms of protocol, I think this is the  
13 way I'd like to proceed, subject to you telling me it can't  
14 work that way. I think if there is an objection as to the  
15 translation, then that should come from counsel and, you know,  
16 maybe the interpreter can indicate to counsel. Would that work  
17 or --

18 MS. DONNELLI: Yes, your Honor, we think so, but I  
19 would ask Mr. Lenny to let me know if you have a concern with  
20 what has been translated. Thank you.

21 MR. YANG: Raise my hand?

22 THE COURT: Just raise your hand if you've got a  
23 concern, and then you'll relay it to counsel. We'll take it  
24 slowly. Hopefully there won't be very many, if any, issues.  
25 Anything else before we swear the witness and the interpreter?

L4LPEAS3

Han - Direct

1 Okay. Mr. Fishman?

2 (Interpreters sworn)

3 HAN CHUNGUANG,

4 called as a witness by the Plaintiff,

5 having been duly sworn, testified as follows:

6 THE DEPUTY CLERK: Thank you, and please be seated and  
7 please just state your full name for the record and spell out  
8 your last name.

9 THE DEFENDANT: My name is Han, and my last name is  
10 H-a-n.

11 THE DEPUTY CLERK: Thank you. Please be seated.

12 THE COURT: Mr. Han, I would ask you to try to keep  
13 your voice loud and speak slowly for the benefit of the  
14 interpreters and for my benefit.

15 THE DEFENDANT: Yes.

16 THE COURT: You may inquire.

17 MR. CHUFF: Thank you, your Honor.

18 DIRECT EXAMINATION

19 BY MR. CHUFF:

20 Q. Good afternoon, Mr. Han. Other than Han, do you also have  
21 a name that you go by?

22 A. Yes, my Chinese name.

23 Q. And what is that?

24 A. Han Chunguang.

25 Q. Can you spell that, please?

L4LPEAS3

Han - Direct

1 A. H-a-n, C-h-u-n-g-u-a-n-g.

2 (Continued on next page)

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L4LKEAS4

Han - Direct

1 BY MR. CHUFF:

2 Q. Where were you born, Mr. Han?

3 A. China, Shandong Province.

4 Q. In what country do you currently live?

5 A. United States.

6 Q. When did you move to the United States?

7 A. May 2017.

8 Q. Are you a citizen of the United States?

9 A. No.

10 Q. Do you have an asylum application pending with the United  
11 States Government?

12 A. Yes.

13 Q. When was that application submitted?

14 A. October 2017.

15 Q. And what is the status of that application?

16 A. In progress.

17 Q. Now, Mr. Han, have you ever heard of a company called  
18 Eastern Profit Corporation Limited?

19 A. Yes.

20 Q. How did you first become involved with Eastern Profit?

21 A. In 2014, 18th of August, I acquired this company.

22 Q. So you became the owner of Eastern Profit at that time?

23 THE INTERPRETER: Counsel, could you repeat?

24 Q. So you became the owner of Eastern Profit at that time?

25 A. Yes. I was this company's director.



L4LKEAS4

Han - Direct

1 Q. And also the owner?

2 A. Yes.

3 Q. Did there come a time when you stopped being the owner and  
4 director of Eastern Profit?

5 A. In 2017, June 27th, I transferred this company to Guo Mei.

6 Q. And who is Guo Mei?

7 A. Guo Mei is Guo Wengui's daughter.

8 Q. And what's her relationship to you?

9 A. We're friends.

10 Q. Did you have any role with Eastern Profit after you sold it  
11 to Guo Mei?

12 A. I'm this company's agent.

13 Q. And who authorized you to be Eastern Profit's agent?

14 A. Guo Mei.

15 Q. Now, did there come a time where Eastern Profit sought to  
16 investigate certain members of the Chinese Communist Party?

17 A. Yes.

18 Q. When did you first learn of that potential investigation?

19 A. It was early December 2017, Yvette called me and told me  
20 that there was such an investigative company.

21 Q. And did she tell you anything else about the opportunity,  
22 the investigation?

23 THE INTERPRETER: Counsel, do you mind to repeat  
24 yourself?

25 MR. CHUFF: Yes, strike that question.

L4LKEAS4

Han - Direct

1 BY MR. CHUFF:

2 Q. Did she tell you anything else about the potential  
3 investigation?

4 A. So she told me that was such a great company who can  
5 investigate the CCP's corruption and let the people of China  
6 know about the truth, and it would require 1 million-some money  
7 to proceed.

8 CHECK INTERPRETER: The refund.

9 MS. DONNELLI: Your Honor --

10 CHECK INTERPRETER: It is refundable.

11 THE INTERPRETER: Oh.

12 A. It's refundable.

13 Q. And how did you respond to Ms. Wang?

14 A. So, she told me about this project, and she asked me  
15 whether I was interested to participate, and I said I was  
16 interested to participate.

17 Q. And after discussing with Yvette, what did you do next?

18 A. We talked about that at her office, I went to her office,  
19 and after we finished the discussion, I called Guo Mei.

20 Q. So you had a follow-up discussion with Yvette in her office  
21 and then called Guo Mei?

22 A. Well, I called -- it was a phone call first, we had a  
23 conversation, and then we had another conversation at the  
24 office, and then after that, I called Guo Mei and told Guo Mei  
25 about that.

L4LKEAS4

Han - Direct

1 Q. What did you discuss with Guo Mei about the potential  
2 investigation?

3 A. So, Yvette told me about this project, and so I said  
4 Eastern Profit is going to participate, and because Guo Mei was  
5 the director, so I called Guo Mei and then told her about that,  
6 and she authorized me to take care of that. So I called Yvette  
7 to tell her that.

8 Q. What did you tell Yvette after your discussion with Guo  
9 Mei?

10 A. So, I told Yvette that Guo Mei authorized me, and I had the  
11 authorization from Guo Mei, and then I also authorize Yvette to  
12 take care of this investigation completely.

13 Q. Now, why did you authorize Ms. Wang to handle the  
14 investigation rather than handling it yourself?

15 A. It's because, first of all, it was Yvette who told me about  
16 this project, and she knew about it more, and, also, my English  
17 was not so good, and, also, I trust Yvette.

18 Q. What did you do after authorizing Ms. Wang to handle the  
19 investigation?

20 A. The next, I tried to get hold of William, because I want to  
21 borrow \$1 million from him, so I called William.

22 Q. And what's William's full name?

23 A. William Je.

24 Q. And who is William Je?

25 A. He's my good friend.

L4LKEAS4

Han - Direct

1 Q. And how did William respond to your request for a loan?

2 THE INTERPRETER: Counsel, do you mind if I clarify a  
3 point with the witness? I think I missed something he said.

4 MR. CHUFF: Your Honor, does she have that permission?

5 THE COURT: Yes.

6 THE WITNESS: So I called William. I told him that  
7 there was such a investigative project, and it would require  
8 1 million, and I want to borrow money from him.

9 BY MR. CHUFF:

10 Q. And how did William respond to that request?

11 A. And so William was interested because he was also anti-CCP,  
12 and he said that he would consider it. And we had two or three  
13 phone calls after that, and then at the end, he lent me the  
14 money.

15 Q. Now, on those phone calls, did you discuss the details of  
16 the loan?

17 A. So, yes, we did talk about certain details, such as the  
18 loan amount is 1 million, the term will be six months, and  
19 monthly interest is 2 percent.

20 Q. After your phone calls with William, what happened next?

21 A. So in 2017, December 29th, at Palace Hotel, we signed the  
22 loan agreement.

23 Q. Mr. Han, was anyone else present at that meeting?

24 A. No.

25 Q. For how long did you meet with William?

L4LKEAS4

Han - Direct

1 A. Twenty minutes.

2 Q. On whose behalf did you sign the loan agreement?

3 A. Eastern Profit.

4 Q. And on whose behalf did William sign?

5 A. ACA.

6 Q. Now, let me ask you: Why would Eastern Profit be willing  
7 to incur a \$1 million loan to commission this investigation?

8 A. It is because this investigation can help to disclose the  
9 corruption of the CCP, can help the people of China knowing the  
10 truth, so Eastern Profit is very willing to participate.

11 Q. Okay. Why didn't you just go to a bank or other financial  
12 institution for the loan?

13 A. It's because this project seemed to be rather urgent, and,  
14 also, the company account, Eastern Profit's account, was frozen  
15 in July 2017, and so to seek a loan from the bank will be quite  
16 troublesome.

17 MR. CHUFF: Could we publish PX 11, please.

18 And, your Honor, with your permission, a copy of PX 11  
19 is sitting on the ledge here in front of the witness, and with  
20 your permission, may he approach and retrieve it?

21 THE COURT: Yes. Is there a witness book for this  
22 witness?

23 MR. CHUFF: I handed up two copies of PX 11.

24 THE COURT: Good. I've got that. Okay.

L4LKEAS4

Han - Direct

1 BY MR. CHUFF:

2 Q. Mr. Han, you've just been handed a document marked as  
3 PX 11. Do you recognize this document?

4 A. Yes.

5 Q. What is it?

6 A. It's a loan agreement between Eastern Profit and ACA.

7 Q. Now, are you able to read English, Mr. Han?

8 A. A little bit.

9 Q. And you're still able to recognize this document?

10 A. Yes.

11 Q. And how so? How are you able to recognize this document?

12 A. So, because when we were talking about this agreement,  
13 William pointed out to me the name of his company, my company,  
14 the amount, and then also my name.

15 Q. If you could turn to page 3, please.

16 Mr. Han, does your signature appear on this page?

17 A. Yes.

18 Q. And which signature is it, the top one or the bottom one?

19 A. The top one.

20 Q. And whose signature is at the bottom of the page?

21 A. William.

22 Q. And did you witness William sign this agreement?

23 A. Yes.

24 MR. CHUFF: Your Honor, I'd like to offer PX 11 into  
25 evidence.

L4LKEAS4

Han - Direct

1 MS. DONNELLI: Your Honor, we do object on  
2 admissibility and foundation grounds. This witness does not  
3 speak or read English well. He testified at his deposition -  
4 actually, he testified just now - that another witness, another  
5 person, explained the document to him. This witness can't  
6 authenticate it. This witness did not keep a copy of the  
7 document, and it was some time before this loan agreement was  
8 ever produced in discovery after Ms. Wang gave her first  
9 30(b)(6) deposition for Eastern Profit.

10 THE COURT: I'll take the exhibit subject to a motion  
11 to strike. You can obviously cross-examine with respect to it,  
12 but I will observe that most of your objections go to weight  
13 and not admissibility.

14 But go ahead.

15 (Plaintiff's Exhibit 11 received in evidence)

16 BY MR. CHUFF:

17 Q. Now, Mr. Han, did the loan agreement require Eastern Profit  
18 to share their research results with ACA?

19 A. No.

20 Q. Did the loan agreement require Eastern Profit to share the  
21 research results with William?

22 A. No.

23 Q. Has Eastern repaid the loan?

24 A. No.

25 Q. Has Eastern made any principal payments?

L4LKEAS4

Han - Direct

1 A. No.

2 Q. Any interest payments?

3 A. No.

4 Q. Has the loan agreement been terminated?

5 A. No.

6 Q. Has ACA demanded repayment of the loan?

7 A. Yes.

8 Q. And who from ACA has demanded repayment?

9 THE INTERPRETER: The witness asked to repeat the  
10 interpreting.

11 THE COURT: You may do so.

12 THE INTERPRETER: Okay.

13 THE WITNESS: William.

14 BY MR. CHUFF:

15 Q. Does Eastern intend to repay the loan?

16 A. Yes.

17 Q. How does it intend to do that?

18 A. So if we win this lawsuit, then we can make the repayment.

19 Q. Now, sitting here today, are you still an agent of Eastern  
20 Profit?

21 A. Yes.

22 Q. And is Eastern Profit willing to agree, as part of a court  
23 order, that it will repay to ACA any money it is awarded in  
24 this litigation?

25 MS. DONNELLI: Your Honor, we would object to



L4LKEAS4

Han - Direct

1 foundation of that with this witness.

2 THE COURT: Overruled.

3 THE WITNESS: Yes.

4 BY MR. CHUFF:

5 Q. And is Eastern Profit willing to agree, as part of a court  
6 order, that any money awarded to Eastern in this litigation be  
7 paid directly to ACA?

8 MS. DONNELLI: Your Honor, same objection, please.

9 THE COURT: Overruled.

10 THE WITNESS: Yes.

11 MR. CHUFF: Your Honor, no further questions at this  
12 time.

13 THE COURT: Do you want to start your  
14 cross-examination, go for about ten minutes?

15 MS. DONNELLI: Your Honor, we may just do lunch now,  
16 is our recommendation.

17 THE COURT: All right. It is just before 1:00. We'll  
18 reconvene at 2:00 o'clock. Everybody should be back in their  
19 seats a little bit before 2:00. My expectation is that today,  
20 we'll go a little bit beyond 5:00 p.m. to try to get as much  
21 testimony in as we can.

22 MR. CHUFF: Thank you, your Honor.

23 THE COURT: Actually, before we break, Mr. Greim,  
24 there is one question I want to ask you.

25 You indicated with respect to the last witness, that

L4LKEAS4

1 there was a question or two that you had open. I think it  
2 would be helpful for me to know what the questions are and what  
3 the line of examination is.

4 MR. GREIM: Should I tell you right now?

5 THE COURT: Yes.

6 MR. GREIM: I want to know whether -- it's sort of two  
7 points. I want to know whether she was concerned about  
8 disclosing Han Chunguang in the earlier part of the exhibit and  
9 whether that didn't already raise the same concerns that she  
10 raised for the rest of it. And I want to ask her again whether  
11 she simply misremembered and whether, in fact, she did give  
12 truthful statements to the other questions, like whether he had  
13 knowledge.

14 THE COURT: Very well.

15 We're adjourned until 2:00 o'clock. Thank you.

16 (Luncheon recess)

L4LKEAS4

## AFTERNOON SESSION

2:02 PM

(Trial resumed)

THE COURT: Anything either party has to raise with the Court before we continue with the testimony? Ms. Cline?

MS. CLINE: I do have one housekeeping matter, your Honor. With respect to the exhibits, as to which your Honor mentioned that you would reserve judgment this morning, recognizing that we closed the briefing at midnight last night, we were wondering if your Honor has a timing on the ruling, because if your Honor is disinclined to admit them, then we may seek an alternative means of admission, given that we just learned about all of this on the first day of trial.

THE COURT: You should seek an alternative -- put together your strongest case for admissibility. I can't tell you when I will decide, and it may not be until I render a decision, in which case, I may not need to decide admissibility because it may be that the document is not relevant to my decision.

MS. CLINE: Understood. Thank you.

THE COURT: Anything from you, Mr. Greim?

MR. GREIM: No, your Honor.

THE COURT: Okay.

Mr. Han, you're reminded that you are still under oath.

L4LKEAS4

Han - Cross

1 THE WITNESS: Yes.

2 THE COURT: Counsel, you may inquire.

3 MS. DONNELLI: Thank you.

4 CROSS-EXAMINATION

5 BY MS. DONNELLI:

6 Q. Nice to see you again.

7 Mr. Han, as a former director of a Hong Kong entity,  
8 Eastern, you are familiar with what registration documents are,  
9 true?

10 A. Yes.

11 MS. DONNELLI: Can we please pull up DX 126A.

12 Q. Mr. Han, you testified that Eastern received a loan from  
13 ACA, true?

14 A. Yes.

15 Q. Do you see that this is a registration document for ACA  
16 Capital Group Limited?

17 A. I see it.

18 Q. That is the same entity you testified gave a loan to  
19 Eastern, true?

20 A. Yes.

21 Q. The title of this document is "Notice of Change of Company  
22 Secretary and Director," true?

23 A. Yes.

24 Q. If we scroll down to the bottom of the page, we see that  
25 the registry received this on August 22nd, 2019, true?

L4LKEAS4

Han - Cross

1 A. I see it.

2 Q. If we turn to the third page of the document, at the top,  
3 we see "Appointment of Company Secretary/Director." Do you see  
4 that?

5 A. Yes.

6 THE COURT: Excuse me, counsel. Do you have a copy of  
7 126A that you could hand up to the Court? I've got 126 in the  
8 binder you gave me, but no 126A.

9 Thank you.

10 MS. DONNELLI: I apologize, your Honor. We intended  
11 to have that.

12 BY MS. DONNELLI:

13 Q. Mr. Han, this document is showing the appointment of a  
14 company secretary or director for ACA, true?

15 A. Well, I don't know, really, things like that, but from what  
16 I see here, that is correct.

17 Q. The name indicated is there in Chinese, Mandarin, true?

18 A. Yes.

19 Q. The name is Chen, C-h-e-n; the last name, or the next name,  
20 is Q-i-a-o-l-i-n-g, true?

21 A. Yes.

22 Q. Below that, we see an address, true?

23 A. Yes.

24 Q. We see that's in the People's Republic of China?

25 A. Yes.

L4LKEAS4

Han - Cross

1 Q. Thank you.

2 Before our lunch break, you testified that Eastern  
3 Profit would agree to send any money, any monetary recovery in  
4 this case, to ACA, true?

5 A. Yes.

6 Q. This means that you're comfortable, then, sending money to  
7 a company whose director is in Mainland China?

8 A. Well, it's because I borrowed the money from William, so I  
9 will return the money to William.

10 Q. I believe the stipulation was for Eastern to return the  
11 money to ACA, true?

12 A. Yes.

13 Q. The director that's indicated in the document we just  
14 reviewed was in Mainland China, true?

15 A. Yes.

16 Q. That's the formal registration document that ACA is telling  
17 Hong Kong to reveal its director, true?

18 MR. CHUFF: Objection; foundation.

19 THE COURT: Well, she's asking the question. I assume  
20 you've got a good-faith basis for it. If the witness knows of  
21 the authenticity of the document, then the witness can testify  
22 to it; if the witness doesn't know, the witness will indicate  
23 the witness doesn't know.

24 MS. DONNELLI: Thank you.

25 THE INTERPRETER: I'm sorry, do you mind to repeat the

L4LKEAS4

Han - Cross

1 question?

2 MS. DONNELLI: Your Honor, could we have our court  
3 reporter read back the question, please?

4 THE COURT: Yes, read back the question.

5 MS. DONNELLI: Thank you.

6 MR. CHUFF: Could we just read your ruling to the  
7 witness?

8 THE COURT: No, I don't think so.

9 Instead of having the court reporter read it back, why  
10 don't you ask your question again.

11 MS. DONNELLI: Okay. Thank you, your Honor.

12 And we would note that this exhibit, 126A, is part of  
13 126, which the Court has admitted. It is correspondence from  
14 Ms. Cline to the Court.

15 BY MS. DONNELLI:

16 Q. Mr. Han, you agree that the document we just looked at is a  
17 record of information that ACA has provided to the Hong Kong  
18 authority about the identity of its director, true?

19 A. Well, I don't know about these. I don't know the internal  
20 structure of ACA either.

21 Q. Thank you. I'll move on.

22 Mr. Han, you're familiar with Guo Wengui?

23 A. Yes.

24 Q. Mr. Guo was your idol and mentor?

25 A. He is a man that I respect very much.

L4LKEAS4

Han - Cross

1 Q. He has taught you many things?

2 A. Yes.

3 Q. You have met with Mr. Guo in his penthouse apartment in the  
4 Sherry-Netherland Hotel to learn from him?

5 A. Yes.

6 Q. That's your place of work, isn't it?

7 A. No.

8 Q. Do you know a gentleman named Lianchao Han?

9 A. I don't have an impression of that.

10 Q. Are you familiar that Mr. Lianchao Han has assisted Mr. Guo  
11 in seeking asylum in the United States?

12 A. I don't know.

13 Q. Would it surprise you that Mr. Lianchao Han gave a  
14 deposition in this case?

15 THE INTERPRETER: Gave?

16 MS. DONNELLI: Gave a deposition in this case?

17 A. A little bit.

18 Q. Mr. Lianchao Han was deposed just like you were deposed in  
19 this case. Do you remember that?

20 MR. CHUFF: Objection, your Honor.

21 THE COURT: Sustained. Move on.

22 BY MS. DONNELLI:

23 Q. Mr. Han, do you run errands for Mr. Guo?

24 A. If Mr. Guo would have such a need, I would, but then  
25 Mr. Guo would not have directed a lot of things either.



L4LKEAS4

Han - Cross

1 Q. Are you a cook for Mr. Guo?

2 THE COURT: Overruled.

3 THE WITNESS: No.

4 BY MS. DONNELLI:

5 Q. If you don't work for Mr. Guo, where, then, do you work,  
6 Mr. Han?

7 A. I work for a company of my family.

8 Q. What is the name of that company?

9 A. Han's family, Hanjia.

10 Q. Isn't it true at your deposition that you testified the  
11 name of your family company has nothing to do with this case?

12 THE INTERPRETER: Counsel, do you mind repeating your  
13 question?

14 Q. Isn't it true at your deposition you testified that the  
15 name of your family company has nothing to do with this case?

16 A. Yes.

17 Q. You also testified that your family trust, your family  
18 company, had no involvement with the Eastern Profit, true?

19 A. Correct.

20 Q. Where is the office of your family company?

21 A. In China.

22 Q. You're testifying that you work here in the United States  
23 for a company that's based in China?

24 A. Well, you are asking me do I have job. I said I have, and  
25 then I'm working for this company, my family's company. I

L4LKEAS4

Han - Cross

1 would be doing things for it.

2 Q. The family company has no office location in the United  
3 States; is that your testimony?

4 A. That's correct.

5 Q. Its location is in Mainland China?

6 A. Yes.

7 Q. The person to whom you report is in Mainland China?

8 A. Yes.

9 Q. What is the name of that person?

10 A. My family.

11 Q. What is the name of the person to whom you report in your  
12 job?

13 A. Well, that cousin's name, that cousin is my family. I  
14 don't think that I want to disclose the name of my family here.

15 Q. Why is it that you can't tell us the name of the person to  
16 whom you report in your job?

17 THE COURT: There's an objection, I think? What's the  
18 objection?

19 MR. CHUFF: Objection; relevance.

20 THE COURT: What is the relevance?

21 MS. DONNELLI: Your Honor, I'm trying to establish  
22 this witness' actual employment.

23 THE COURT: I don't think you need a name for the  
24 witness' employment. The objection is sustained.

25 MS. DONNELLI: Thank you.

L4LKEAS4

Han - Cross

1 BY MS. DONNELLI:

2 Q. Does your family trust have any other employees besides  
3 yourself?

4 A. Just my family and my family.

5 Q. Where does your family trust obtain the funds to pay you  
6 for your work?

7 MR. CHUFF: Objection; relevance.

8 THE COURT: Overruled. But I assume you're going to  
9 bring this line of examination to an end soon?

10 MS. DONNELLI: Yes. Thank you, your Honor.

11 THE COURT: It's got marginal relevance.

12 MS. DONNELLI: Thank you.

13 BY MS. DONNELLI:

14 Q. What is the nature of the work that you do in the United  
15 States for your family in Mainland China?

16 A. Join in some -- participate in some meeting, and after the  
17 meeting, perhaps we can communicate.

18 Q. I'm not sure you understood the question, Mr. Han.

19 What is the nature of the work? What do you do here  
20 in the United States for your family? What are your tasks?  
21 What are your roles? What are your jobs?

22 THE COURT: The objection is sustained, in part,  
23 because it's multipart and, in part, because it would be  
24 impossible for the interpreter to translate a multipart  
25 question. So why don't you break it apart.

L4LKEAS4

Han - Cross

1 MS. DONNELLI: Okay.

2 BY MS. DONNELLI:

3 Q. Mr. Han, could you describe for us what you do, in general,  
4 on a daily basis for your family trust while you're here in the  
5 United States?

6 A. Well, it is my family's company, and so every several  
7 weeks, not regular, that we will have phone calls, and if there  
8 is something they want me to participate, then we will discuss.

9 Q. Are you related by family to Guo Wengui?

10 A. No.

11 Q. Are you related by family to Yvette Wang?

12 A. No.

13 Q. Does your family trust employ Yvette Wang?

14 A. No.

15 Q. You've had three years of college, true?

16 THE INTERPRETER: Sorry?

17 Q. You had three years of college, true?

18 A. Well, where I was wasn't really a college. It was like a  
19 college of sport.

20 Q. We're going to pull up some of your deposition testimony,  
21 and in the notebook there, your testimony has been translated  
22 into Mandarin, if would you like to follow along.

23 A. Okay.

24 Q. We are going to go to page 61.

25 THE COURT: Counsel, after today's testimony, I would

L4LKEAS4

Han - Cross

1 like the parties to confer and to mark the depositions with an  
2 exhibit number, and then tomorrow morning, you can give me the  
3 exhibit number.

4 Counsel, you'll give us the page number and line  
5 number for the parts of the depositions, too, which you're  
6 referring the witness.

7 MS. DONNELLI: Thank you.

8 BY MS. DONNELLI:

9 Q. We are going to be at page 61.

10 A. Is that 61, 6-7?

11 Q. It's going to be page 61, line 17 through page 62, line 7.

12 A. I don't know how to actually look for it. I don't know how  
13 to find it.

14 Q. I think, if it's all right, our translator can show you.

15 MS. DONNELLI: Thank you.

16 Q. I'm going to start reading at line 17:

17 "Q. Yes, but specifically to give you the preparation that you  
18 needed to be a director of Eastern Profit."

19 That was the question.

20 The answer by you, Mr. Han: "I went to two-year  
21 college. Secondly, Mr. Guo has been teaching me a lot."

22 And then your answer went on to say, "I formed a  
23 three-year college. Secondly, Mr. Guo has been teaching me a  
24 lot. Thirdly, I love to read books, have educated me a lot.  
25 Fourthly, society was also a good teacher that taught me a

L4LKEAS4

Han - Cross

1 lot."

2 Did I read those words correctly?

3 THE INTERPRETER: Do you mind to scroll back to 61 for  
4 me?

5 Okay, I'm sorry, did I read something wrong? Ms. Wang  
6 and the interpreter, what was I supposed to be reading,  
7 counsel?

8 MS. DONNELLI: Madam Translator, we have the portion  
9 translated for our witness, so when I'm reading it into the  
10 record, we will not need you to read the question or the answer  
11 because it's already been translated for the witness.

12 THE INTERPRETER: So you don't want me to read --

13 THE COURT: I'm not so sure that that's right. Unless  
14 the translation has been agreed upon with the plaintiffs, it's  
15 not right.

16 MS. DONNELLI: Okay. Then it has not been agreed  
17 upon.

18 MR. CHUFF: Yes, objection. We've never seen it.

19 THE COURT: So we will need you to translate the  
20 portions of the deposition that are being read to the witness.

21 THE INTERPRETER: Okay. So, counsel, I should read  
22 from line 17 from page 61 to all the way to 62, line 7, right?

23 MS. DONNELLI: Yes, but you won't need to read any  
24 objections or things of that nature.

25 THE INTERPRETER: The part that Ms. Wang said, the

L4LKEAS4

Han - Cross

1 interpreter said, those, I don't need to read, right?

2 THE COURT: That's correct.

3 MS. DONNELLI: Correct.

4 (Pause)

5 THE WITNESS: I see that.

6 BY MS. DONNELLI:

7 Q. Did I read the question and the answer correctly?

8 A. Yes.

9 Q. Did I read your answers correctly?

10 A. Well, I do need to clarify somewhat here, because the  
11 school structures were quite different from here. The school  
12 that I went to, strictly speaking, it wasn't a college or  
13 university. It was like a school -- institute, a kind of  
14 school.

15 Q. Mr. Han, did you say the words at your deposition, "I  
16 formed a three-year college"?

17 A. Yes.

18 Q. Thank you.

19 You were being truthful at your deposition, true?

20 A. Yes.

21 Q. What was the name of the school in China you attended?

22 A. Jinan College.

23 THE COURT: Ms. Donnelly, are you going to bring this  
24 to a point at some someplace?

25 MS. DONNELLI: Yes, your Honor. We'll move on.

L4LKEAS4

Han - Cross

1 BY MS. DONNELLI:

2 Q. Mr. Han, you began having an affiliation with Eastern  
3 Profit while you were still living in Hong Kong, true?

4 THE INTERPRETER: Counsel, do you mind to repeat  
5 because the check interpreter just informed me that perhaps it  
6 should be called sports academy.

7 MS. DONNELLI: Thank you.

8 BY MS. DONNELLI:

9 Q. Mr. Han, you began having an affiliation with Eastern  
10 Profit while you were still living in Hong Kong, true?

11 A. Yes.

12 Q. You purchased Eastern Profit in 2014?

13 A. Yes.

14 Q. You purchased Eastern Profit for 1,000 Hong Kong currency?

15 A. Yes.

16 Q. That equates to a few hundred U.S. dollars?

17 A. Yes.

18 Q. You purchased Eastern from a friend spelled Z-h-a-o-h-u-i  
19 X-u?

20 A. Yes.

21 Q. You were around 25 years old when you purchased Eastern  
22 Profit?

23 A. Yes.

24 Q. You got the money to purchase Eastern Profit from your  
25 family fund?



L4LKEAS4

Han - Cross

1 A. Can you repeat the question? I don't understand this  
2 question.

3 Q. The source of the funds for you to purchase Eastern Profit  
4 came from your family fund?

5 A. Well, it wasn't really my family fund that paid for this --  
6 that paid this money. I brought this money from my own saving.  
7 I have saving myself.

8 Q. We're going to turn to your deposition, page 60. We're  
9 going to read from line 17 to 22:

10 "Q. Where did the fund come from that Eastern Profit used" --  
11 no, skip that.

12 MS. DONNELLI: Move to strike that.

13 THE COURT: Motion is granted.

14 Q. What was the business Eastern Profit was conducting when  
15 you took it over?

16 A. Investment.

17 Q. What type of investment?

18 THE INTERPRETER: Counsel, do you mind if I ask the  
19 witness to clarify a term? I didn't hear very clearly about  
20 the first word. Okay?

21 A. Real estate investment.

22 Q. Did Eastern Profit purchase any real estate?

23 MR. CHUFF: Objection; relevance, your Honor.

24 THE COURT: I share your questions about relevance,  
25 but I'll permit it. Counsel can choose how to use the limited

L4LKEAS4

Han - Cross

1 time they've got as they want.

2 MS. DONNELLI: Was there a question pending?

3 THE COURT: There is one.

4 The question is: Did Eastern Profit purchase any real  
5 estate?

6 THE WITNESS: We did not find anything suitable.

7 BY MS. DONNELLI:

8 Q. Did Eastern Profit also purchase stocks?

9 A. No.

10 Q. I'd like to turn to your deposition at page 55.

11 THE INTERPRETER: Do we have it on the screen?

12 MS. DONNELLI: Okay. We'll withdraw that.

13 Q. You were Eastern Profit's sole director, true?

14 A. Yes.

15 Q. You were the boss of Eastern?

16 A. Yes.

17 Q. When you owned Eastern, you had an agent named Natasha run  
18 it for you, true?

19 A. Yes.

20 Q. Natasha did everything for you regarding Eastern's  
21 business, true?

22 A. Yes.

23 Q. Natasha had your full authorization to handle matters for  
24 you in Hong Kong, true?

25 A. Eastern Profit, to handle the matters for Eastern Profit.

L4LKEAS4

Han - Cross

1 Q. Thank you.

2 Where was Eastern Profit's office located in  
3 Hong Kong?

4 A. I don't recall clearly.

5 Q. Was Eastern Profit's office in the Bank of China building?

6 A. I seriously don't recall very clearly.

7 Q. But you were at Eastern Profit's office while you were its  
8 director, true?

9 A. Well, at the time, Natasha was in the Bank of China  
10 building, so whatever I have -- whatever I want to do, I'll  
11 just go to her in Bank of China.

12 Q. So you did conduct business in the Bank of China building  
13 as Eastern Profit, true?

14 THE INTERPRETER: Counsel, the check interpreter has  
15 something he wanted to correct me, perhaps.

16 THE COURT: You may correct.

17 CHECK INTERPRETER: I believe the witness mentioned  
18 the 49th floor of the Bank of China building.

19 THE WITNESS: So I would go to -- whenever I want to  
20 do that, I would go to find Natasha on the 49th floor in Bank  
21 of China building.

22 BY MS. DONNELLI:

23 Q. Natasha was doing Eastern Profit's business on the 49th  
24 floor of the Bank of China building, true?

25 A. You may say that because I just let Natasha to handle

L4LKEAS4

Han - Cross

1 Eastern Profit's Hong Kong business herself.

2 Q. ACA also had a location in the Bank of China building,  
3 true?

4 A. I don't know.

5 Q. Did you ever meet William Je in the Bank of China building?

6 A. I don't have recollection of that.

7 Q. Did Eastern engage in any political activities in  
8 Hong Kong?

9 A. I don't understand your question.

10 Q. Did Eastern Profit engage in any activities that were of a  
11 political nature, having to do with politics?

12 A. Well, this time Eastern Profit engaged this cheating  
13 company investigating the China's Communist Party's corruption,  
14 does it count?

15 Q. So, in your understanding, Eastern was conducting political  
16 matters in its investigation through Strategic Vision, true?

17 A. Well, I don't know, really, much about the specifics. I  
18 only know briefly about the framework, that is, to investigate  
19 the government officials in the CCP regarding their corruptions  
20 and so to let the people in China know -- learn the truth.

21 Q. So Strategic was assisting Eastern in something that was  
22 political, true?

23 THE COURT: Sustained.

24 THE WITNESS: Do you need to repeat that?

25 THE COURT: The objection is sustained. You don't

L4LKEAS4

Han - Cross

1 have to answer the question.

2 BY MS. DONNELLI:

3 Q. Mr. Han, how much did you --

4 MS. DONNELLI: Yes?

5 THE INTERPRETER: Your Honor, do I need to interpret  
6 all the objections and things?

7 THE COURT: I think you should.

8 THE INTERPRETER: Okay.

9 BY MS. DONNELLI:

10 Q. Mr. Han, how much did you receive when you sold Eastern to  
11 Guo Wengui's daughter?

12 A. It is handled by Natasha for me, so I don't remember.

13 Q. You don't have a recollection of how much you received for  
14 selling your company?

15 A. That's correct.

16 Q. Did Eastern have any assets at the time you sold it to Guo  
17 Wengui's daughter?

18 A. Some.

19 Q. What were they?

20 A. When you're talking about assets, what is it, really?

21 Q. Anything of value that Eastern owned, whether that be money  
22 or any other thing of value.

23 A. Well, there was money in the account of Eastern Profit.

24 Q. How much was there?

25 A. It was about 70 to 80 thousand U.S. dollars, but it was

L4LKEAS4

Han - Cross

1 frozen.

2 Q. Was there anything else that Eastern Profit owned besides  
3 the account with the 70 or 80 thousand U.S. dollars?

4 A. It has a vehicle.

5 Q. Anything besides the vehicle?

6 A. Not to my recollection.

7 Q. Why did you sell Eastern Profit to Guo Mei, Guo's daughter?

8 A. Well, it was because Guo Mei wanted to have a company that  
9 make film, and so she asked me then, so I transferred the  
10 company to her.

11 Q. Did Guo Mei actually, then, get into the movie business?

12 A. We did prepare to enter.

13 Q. Did that actually happen?

14 A. No, because in July 2017, my account was frozen, so there  
15 was no way we can proceed.

16 Q. So you sold a business with a frozen account to Guo Mei?

17 A. No. When I sold the company to Guo Mei, it was June 27th.  
18 At the time, the account wasn't frozen.

19 Q. When was the account frozen?

20 A. In July.

21 Q. Why did you resign as director of Eastern Profit?

22 A. Well, it's because, after all, film is something that Guo  
23 Mei is more familiar with, and so I just think that transfer to  
24 her, so she can get into it altogether.

25 Q. Was Eastern Profit the only source for Guo Mei to get

L4LKEAS4

Han - Cross

1 funding for her film project?

2 MR. CHUFF: Objection; relevance.

3 THE COURT: Overruled.

4 THE WITNESS: Can we repeat the question?

5 BY MS. DONNELLI:

6 Q. We'll skip it.

7 Was Natasha still working for Eastern when you sold it  
8 to Guo Mei?

9 A. At the time, she was.

10 Q. Is Natasha still working for Eastern?

11 A. No, she is not, because you see in the second half of 2017,  
12 she just disappeared altogether.

13 I want to clarify one thing: In the last deposition,  
14 I mentioned it was 2018, but it is actually 2017. This time is  
15 accurate.

16 Q. Do you have any understanding as to why Eastern's assets  
17 were frozen?

18 A. Well, I believe that is a trick played by the Chinese  
19 Communist Party.

20 Q. Your own personal assets were frozen?

21 A. Yes.

22 Q. When you sold Eastern Profit, did your association with  
23 Eastern Profit end?

24 A. Well, after I sold the company to Guo Mei, I was the agent  
25 for Eastern Profit.

L4LKEAS4

Han - Cross

- 1 Q. Who made you the agent?
- 2 A. It was Guo Mei who asked me to be the agent.
- 3 Q. Did Guo Mei put anything in writing making you an agent?
- 4 A. No.
- 5 Q. Where were you living when you became the agent?
- 6 A. United States.
- 7 Q. Where was Guo Mei living?
- 8 A. United States.
- 9 Q. What time frame did Guo Mei make you an agent?
- 10 A. Well, it was at the time that I sold the company to her,
- 11 and she said perhaps I can stay on to be the agent, if
- 12 something is the matter, then she can consult with me.
- 13 Q. As agent, could you enter into a contract for Eastern?
- 14 A. Yes.
- 15 Q. Could you enter into a loan for Eastern?
- 16 A. Yes.
- 17 Q. Could you hire people for Eastern?
- 18 A. Yes.
- 19 Q. Did you?
- 20 A. Well, there was a loan. I borrowed money from -- it was
- 21 the loan to ACA.
- 22 Q. Do you consider that to have hired someone?
- 23 A. I don't understand.
- 24 Q. I ask, Mr. Han, whether you hired anyone as an agent for
- 25 Eastern?



L4LKEAS4

Han - Cross

1 A. No.

2 Q. Did you have to get approval from Guo Mei to take a loan  
3 out with ACA?

4 A. I don't need her approval; however, I did report such a  
5 matter to her.

6 Q. Did Guo Mei give you authority to pass your authority for  
7 Eastern Profit on to anyone else?

8 THE INTERPRETER: Counsel, do you mind to repeat your  
9 question?

10 MS. DONNELLI: Did Guo Mei's authority to Mr. Han  
11 include Mr. Han passing his authority to anyone else for  
12 Eastern?

13 THE WITNESS: Yes.

14 BY MS. DONNELLI:

15 Q. Did you do that?

16 A. Well, for the investigative project, then I did authorize  
17 Yvette to handle that.

18 Q. When you were an agent for Eastern, were you paid?

19 A. No.

20 Q. Do you expect to be paid in the future?

21 A. No.

22 Q. During the time you were agent, did you keep books and  
23 records for Eastern?

24 A. No.

25 Q. Did Eastern have any liabilities or responsibilities when

L4LKEAS4

Han - Cross

1 you were an agent for Eastern?

2 A. There was one loan to ACA.

3 Q. Did you keep any record of that loan to ACA?

4 A. It was that borrowing activity.

5 Q. Did you keep any written --

6 CHECK INTERPRETER: I think he said the agreement, the  
7 loan agreement.

8 THE WITNESS: Yes, it was a loan agreement.

9 BY MS. DONNELLI:

10 Q. Did you keep a written record of the loan agreement as you  
11 were an agent for Eastern?

12 A. No.

13 Q. Why not?

14 A. Well, for this investigative company, I authorize Yvette to  
15 handle that completely, so she was doing that.

16 MS. DONNELLI: I want to pull up our Exhibit PX 17,  
17 which has already been admitted. This document has been  
18 translated, and it's in the notebook.

19 THE COURT: I don't think I've got PX 17 in the little  
20 binder you gave me of exhibits.

21 MS. DONNELLI: I apologize, your Honor.

22 BY MS. DONNELLI:

23 Q. What is the title of this document?

24 A. It's a power of attorney.

25 Q. What does this document do?

L4LKEAS4

Han - Cross

1 A. It's the contract or an agreement between Eastern Profit  
2 and these liar company.

3 Q. If we turn to the bottom of page 2, is that your signature  
4 above the typewritten words "Chunguang Han"?

5 A. Yes.

6 Q. Did you sign for Eastern Profit?

7 A. Yes.

8 Q. Did you sign as director of Eastern Profit?

9 A. As an agent.

10 Q. The document says your title is director, correct?

11 A. When I was -- when I signed this document, I did not look  
12 at it, and this handwriting wasn't mine, so I did not write on  
13 it.

14 Q. When you say this handwriting was not yours, what does that  
15 mean?

16 A. The signature on top of my name, that was mine, but then  
17 the English, which is below my name, that wasn't mine. That  
18 wasn't my handwriting.

19 Q. When you signed this document, you were not a director of  
20 Eastern Profit, true?

21 A. That's correct.

22 Q. You signed this document on August 30, 2018?

23 A. Yes.

24 (Continued on next page)

L4LPEAS5

HAN - CROSS

1 Q. You signed it in front of Karin Maistrello?

2 A. Yes.

3 Q. Did you give Ms. Maistrello authority to write on the  
4 document after you had signed it?

5 THE INTERPRETER: Do you mind if I clarify for the  
6 witness about what he said? I wasn't exactly sure.

7 THE COURT: Yes, you may do so.

8 A. This document was given to me by a lawyer, and then asked  
9 me to sign my name on it. Then I signed. That's it.

10 Q. Who was the lawyer for?

11 A. I don't know. I don't recall.

12 Q. Do you agree, this document doesn't mention Guo Mei?

13 A. That's correct.

14 Q. It doesn't mention Guo Wengui?

15 A. That's correct.

16 Q. Wasn't Guo Wengui also an agent for Eastern Profit?

17 A. That, I don't know.

18 Q. I'm going to turn to DX48. This should be in the notebook  
19 translated.

20 A. Yes.

21 Q. What is the title of this document?

22 A. A substitution of counsel.

23 Q. Is that your signature at the bottom?

24 A. That signature I authorized Yvette sign it.

25 Q. But you did not, yourself, sign this document?

L4LPEAS5

HAN - CROSS

1 A. That's correct.

2 Q. When did you authorize Yvette Wang to sign this document  
3 for you?

4 A. Well, when we were supposed to have this partnership with  
5 this company, I authorized Yvette so that she can sign on  
6 documents.

7 Q. Was that put in writing?

8 A. Verbally.

9 Q. I'm sorry?

10 A. Verbally.

11 Q. It was verbal?

12 A. Yes.

13 Q. I want to talk now about the research agreement. We can  
14 pull it up. It's been admitted as PX1.

15 A. Yes, I see it.

16 Q. Thank you. The title of this document is Research  
17 Agreement, true?

18 A. Yes.

19 Q. The first time you saw the research agreement was at your  
20 deposition, true?

21 A. Yes.

22 Q. You had never seen the research agreement before that  
23 deposition in November of 2019, true?

24 A. That's correct.

25 Q. You had never heard of Strategic Vision before your

L4LPEAS5

HAN - CROSS

1 deposition, true?

2 A. That's correct.

3 Q. What was the purpose of the research agreement?

4 THE INTERPRETER: Counsel, do you mind if I clarify  
5 with him?

6 A. Yvette told me that it was a fantastic company, very good;  
7 that they can investigate the corruption of the Chinese  
8 Communist Party so we can tell people the truth of them. So  
9 she asked me whether I would be interested, and I said that,  
10 yes, I'd probably be interested to participate.

11 Q. What was the end purpose of the agreement? What was it to  
12 achieve?

13 A. I don't know about the content of this agreement.

14 Q. What was the purpose? What was the objective of the  
15 agreement?

16 A. Well, it was because -- you see, Yvette told me that there  
17 was this great company that can investigate the CCP's  
18 corruption, so that people can learn the truth about them, and  
19 whether I would be interested. And since Eastern Profit is  
20 also a victim and the account was frozen, so I was interested  
21 to participate.

22 Q. Did you hire any company to help you unfreeze Eastern's  
23 account?

24 A. No.

25 Q. You testified earlier today that the deposit under this

L4LPEAS5

HAN - CROSS

1 research agreement was refundable. Can you point out to us  
2 where in this agreement the deposit is refundable --

3 THE COURT: I've got it, absolutely. I have a  
4 different question.

5 Mr. Han, did you ever read the research agreement from  
6 beginning to end?

7 THE WITNESS: No.

8 MS. DONNELLI: Thank you.

9 THE COURT: Do you still want that question? I think  
10 it's pointless.

11 MS. DONNELLI: Okay. Thank you. We'll move on.

12 BY MS. DONNELLI:

13 Q. Mr. Han, you first met William Je in Hong Kong, true?

14 A. Yes.

15 Q. Did you make any plans besides the loan that you described,  
16 of \$1 million, for Eastern to finish paying under the research  
17 agreement?

18 A. Well, Eastern Profit at the moment it was frozen; however,  
19 before it was frozen, it was a normal company that was  
20 operating. So we could have done investments and to make the  
21 payment.

22 Q. What leads you to think that Eastern could have made an  
23 investment that would have been sufficient to cover the cost of  
24 the research agreement?

25 A. Well, first of all, Eastern Profit is a mature company, and

L4LPEAS5

HAN - CROSS

1 I also believe that after the company transferred to Guo Mei  
2 and since she is very good in film, I believe she can operate  
3 this company and make it profitable.

4 Q. How much was the research under the research agreement  
5 going to cost Eastern?

6 A. Well, I don't really know about the details, but when  
7 Yvette was telling me, she told me that the project would  
8 require a million; so I borrow a million from William.

9 Q. Did Ms. Wang tell you the research agreement would require  
10 \$750,000 in the first month?

11 A. No.

12 Q. As agent for Eastern, did you take it upon yourself to  
13 determine how much this research agreement would cost and how  
14 much -- or how it would be paid?

15 A. Well, because for this investigative project involves  
16 something so complicated and they're all in English, so I just  
17 authorized -- I completely authorized Yvette to handle that for  
18 me. And so since she is anti-CCP, I completely have faith in  
19 her.

20 THE COURT: Let me ask one other question, Mr. Han.  
21 Were you aware that the research agreement required Eastern to  
22 pay \$9 million a year?

23 THE WITNESS: I don't know.

24 BY MS. DONNELLI:

25 Q. What was the interest on the loan that you, on behalf of



L4LPEAS5

HAN - CROSS

1 Eastern, you say took out from ACA?

2 A. Monthly, two percent.

3 Q. How much does that equal per month in dollars?

4 A. I don't know the calculation on that.

5 Q. When you decided to go to William Je for a loan, why is it  
6 that you believed he would be interested in that loan?

7 A. It's because we are all people who are anti-Chinese  
8 Communist Party; so I believe that he definitely would be  
9 interested.

10 Q. Today you testified that you spoke with Mr. Je about this  
11 loan on the phone; do you recall that testimony?

12 A. Yes.

13 Q. Isn't it true that you actually met Mr. Je to negotiate  
14 this loan?

15 A. We discussed that over the phone, and then we signed the  
16 agreement in person.

17 Q. Did you only meet Mr. Je one time to sign the loan in  
18 person?

19 A. Yes.

20 Q. I'm going to turn to your deposition at page 133. I'm  
21 going to start with line 13.

22 A. Yes, I see that.

23 Q.

24 "Q. How many times did you meet with Mr. Je in person about  
25 this loan agreement?

L4LPEAS5

HAN - CROSS

1 "A. I think two or three times."

2 Did I read the question and answer correctly?

3 A. Yes.

4 Q. And then if we read line 16: "Was that before or after the  
5 meeting in the hotel lobby?

6 "A. I think before."

7 Did I read the question and answer correctly?

8 A. Yes.

9 Q. Your answers were truthful when you gave them at your  
10 deposition, true?

11 A. Well, it was an accident because during the deposition, I  
12 was rather confused. I was led by counsel round and round; so  
13 I made this answer.

14 Q. So your answer was not truthful at the deposition?

15 A. Well, I can make clarification with this information here.

16 Q. I'm sorry?

17 A. Clarification for the information here.

18 Q. You agree, at your deposition, you said those words, true?  
19 You said those words at your deposition, true?

20 A. Yes.

21 Q. At the deposition, on that page we've read from, you don't  
22 see yourself telling me that you're confused by the question,  
23 true?

24 A. That's correct.

25 Q. You don't see that you asked me for an opportunity to

L4LPEAS5

HAN - CROSS

1 complete or alter your answer, true?

2 A. That's correct.

3 Q. William Je is not often in New York City, is he?

4 MR. CHUFF: Objection, foundation.

5 THE COURT: Overruled.

6 A. I don't know.

7 Q. You would agree that it was fortuitous that you happened to  
8 be able to meet with Mr. Je two or three times regarding the  
9 loan, true?

10 A. Well, I just tried. I don't quite understand what you mean  
11 because we were talking about the details about this loan over  
12 the phone.

13 Q. Mr. Han, how many months did Eastern have to repay the  
14 loan?

15 THE INTERPRETER: How many?

16 MS. DONNELLI: Months.

17 A. The sooner the better.

18 Q. How many months did Eastern Profit have, under the loan  
19 agreement, to repay the loan?

20 A. Six months.

21 Q. Six months during a time when Eastern asset's are frozen,  
22 true?

23 A. That's correct.

24 Q. Are Eastern's assets still frozen today?

25 A. Yes.

L4LPEAS5

HAN - CROSS

1 Q. Why did you agree for Eastern to have to repay a loan in  
2 six months when its assets were frozen?

3 A. Well, because at the time that Yvette told me about this  
4 investigation, I thought it was great. That was such a great  
5 company, and I thought that maybe that was also a means to help  
6 to defrost the company's accounts. And so that was what I was  
7 thinking in mind at the time; so after we defrost the company  
8 account, that we can get into more investments, and then we can  
9 repay the loan.

10 Q. When the account was unfrozen, it had 80,000 U.S. dollars,  
11 true?

12 A. Even though at the time that was 80,000 only, we could  
13 still be operating and then we could still be investing in  
14 film.

15 THE COURT: Can I see counsel for a moment up at  
16 sidebar, with the court reporter.

17 (Continued on next page)

18  
19  
20  
21  
22  
23  
24  
25

L4LPEAS5

HAN - CROSS

1 (At the side bar)

2 THE COURT: I don't want to cut you off, but I'm  
3 sensitive to the limited time we've got. And questions  
4 about -- repeated questions to the effect that the account was  
5 frozen or asking the witness where language appears in an  
6 agreement that the witness hasn't read may not be the most  
7 efficient use of your time.

8 And as I indicated before, while I may entertain an  
9 application to extend the time of this trial for good cause, I  
10 am going to consider in that application how the time has been  
11 used. So I thought at least fair warning to you.

12 MS. DONNELLI: Thank you.

13 (Continued on next page)

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25

L4LPEAS5

HAN - CROSS

1 (In open court)

2 BY MS. DONNELLI:

3 Q. Did Mr. Je ask you how Eastern was going to pay back the  
4 loan?

5 A. Let me clarify. It's not Mr. Je, it's William.

6 Q. William Je is the same as William Ju, J-u, true?

7 A. Well, I don't know whether they are the same person, but  
8 the William I know is William Yu, and his last name is Yu.

9 Q. Did you receive a copy of the loan agreement?

10 A. What agreement, sorry?

11 Q. The loan agreement.

12 A. It was on December 29, 2017, we signed the agreement in  
13 Palace Hotel.

14 THE INTERPRETER: Interpreter making a correction.  
15 Plaza Hotel.

16 Q. But you didn't keep a copy of the loan agreement, true?

17 A. That's correct.

18 Q. Thank you.

19 THE COURT: Mr. Han, do you have PX11 in front of you?

20 THE WITNESS: Yes.

21 THE COURT: Are you saying that you saw this document  
22 on December 29th at the Plaza Hotel?

23 THE WITNESS: Yes.

24 THE COURT: Did you see this document at any time  
25 before December 29th?

L4LPEAS5

HAN - CROSS

1 THE WITNESS: No.

2 MS. DONNELLI: Your Honor, just to follow up on that.

3 BY MS. DONNELLI:

4 Q. Mr. Han, I'd like to direct you to your deposition. We're  
5 looking at page 135 -- excuse me, 134, line 21:

6 "Q. Did you keep a copy of this loan agreement after you  
7 signed it that day in the hotel lobby with Mr. Je?

8 "A. No."

9 A. That's correct.

10 Q. Did I read the words as your answer correctly?

11 A. Yes.

12 Q. Those were true words when you gave them at the deposition?

13 A. Yes.

14 MS. DONNELLI: Thank you. No further questions.

15 THE COURT: Any reexamination?

16 MR. CHUFF: No, your Honor.

17 THE COURT: Why don't you clean the podium.

18 Mr. Han, you're excused. Thank you very much.

19 (Witness excused)

20 THE COURT: Who is the next witness?

21 MS. CLINE: The plaintiff calls Guo Wengui.

22 THE COURT: Why don't we bring him in. I take it he's  
23 also going to need the interpreter?

24 MS. CLINE: He's going to need an interpreter, and I  
25 think there will be some housekeeping around his own counsel,

L4LPEAS5

HAN - CROSS

1 who is present.

2 THE COURT: While we're getting the jury box and the  
3 witness stand ready, is this the witness who there is a  
4 potential issue of invoking the Fifth Amendment?

5 MS. CLINE: It is, your Honor.

6 THE COURT: And I take it that still is a live issue?

7 MS. CLINE: It is.

8 THE COURT: Is counsel for the witness present in the  
9 courtroom?

10 MS. CLINE: I don't see him, but I believe he's in the  
11 vestibule. May I leave a copy of the exhibit on the bar?

12 THE COURT: Yes, please. And while you're at it, are  
13 there exhibits, plaintiff's exhibits for Mr. Guo and defense  
14 exhibits for Mr. Guo?

15 MR. CHUFF: Yes, your Honor. I handed up two binders.

16 THE COURT: I've got them. Thank you.

17 MR. KLEIN: Your Honor? Josh Klein. How are you?

18 THE COURT: Good afternoon.

19 MR. KLEIN: Can I be heard for a moment?

20 THE COURT: Yes.

21 MR. KLEIN: I'm here as Mr. Guo's counsel. My  
22 understanding is, depending on the line of questioning today,  
23 Mr. Guo may want to avail himself of certain constitutional  
24 protections and rights, and I was wondering whether the Court  
25 would allow me to stand or sit somewhere in the courtroom such



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HAN - CROSS

1 that I can advise Mr. Guo when he's on the stand?

2 THE COURT: I had anticipated, Mr. Klein, that that  
3 would be your request. I haven't discussed it with the parties  
4 or with my courtroom deputy.

5 Let me first ask the parties whether there is any  
6 objection. We'll seat the witness, and then while we're doing  
7 that, I'm going to confer with my deputy about the logistics  
8 for that, but let's take first things first.

9 Ms. Cline, any objection?

10 MS. CLINE: No, your Honor.

11 THE COURT: Mr. Greim?

12 MR. GREIM: No, your Honor.

13 THE COURT: Okay.

14 MR. KLEIN: And, your Honor, just one other question.  
15 Just in terms of just facilitating things logistically, to the  
16 extent that if the Court is amenable to what I suggested, one  
17 option would be for me to simply indicate when he's invoking;  
18 alternatively, I can confer with him briefly and he can  
19 indicate. If we can do that?

20 THE COURT: I think the better practice would be for  
21 him to invoke. It can be under advice.

22 MR. KLEIN: Understood.

23 THE COURT: But he should be the one to.

24 MR. KLEIN: Understood.

25 THE COURT: Mr. Guo, you may have a seat in the

L4LPEAS5

HAN - CROSS

1 witness seat in the jury box.

2 THE WITNESS: (In English) Yes, your Honor. Oh,  
3 here?

4 THE COURT: Mr. Klein, we will be able to arrange for  
5 you to sit in the jury box. My suggestion is we have to comply  
6 with the court's social distancing rules, would be for you to  
7 have a pad or something with you so that you can communicate  
8 that way with your client, unless there is some other  
9 suggestion that you've got.

10 MR. KLEIN: I'm not sure, because of the language  
11 issues, whether I'm going to be able to communicate in writing  
12 with him.

13 THE COURT: Right. We're going to take a ten-minute  
14 break while we figure out the logistics now. It's 3:35. We'll  
15 reconvene at 3:45.

16 MR. KLEIN: Thank you, your Honor.

17 (Recess)

18 THE COURT: Be seated. Mr. Klein, I understand that  
19 you've worked out with my courtroom deputy a means for you to  
20 communicate with Mr. Guo and provide advice to him while, at  
21 the same time, observing the Court's social distancing rules;  
22 is that right? And can you describe that to me?

23 MR. KLEIN: Yes, your Honor. With the assistance of  
24 the court interpreter, I will communicate to Mr. Guo advice, to  
25 the extent I need to, and my understanding is that will be

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HAN - CROSS

1 private, that the interpreter would be just facilitating my  
2 ability to privately communicate with Mr. Guo.

3 And to the extent that communication results in an  
4 assertion of rights, Mr. Guo will then vocally assert his  
5 rights.

6 THE COURT: You may be seated, Mr. Klein.

7 Any objection from the plaintiff?

8 MS. CLINE: None from plaintiffs.

9 THE COURT: From defendant?

10 MR. GREIM: None, your Honor.

11 THE COURT: That's acceptable to me. I mean, my main  
12 interest is in making sure that the witness is able to get  
13 advice from counsel. And then also, secondarily, it's  
14 important that we observe the court's social distancing rules  
15 and that I'm able to get the testimony that the witness is  
16 willing to provide.

17 If at any time, Mr. Klein, the mechanism of  
18 communication doesn't work and you need to consult with Mr. Guo  
19 in person, we'll take a break and I'll make arrangements for  
20 that.

21 MR. KLEIN: Yes.

22 THE COURT: I will also, in a moment, ask the  
23 interpreter to convey to Mr. Guo in Chinese exactly what I've  
24 just said to you, which is that if he wants to confer with you,  
25 beyond just the signaling, he can request an opportunity to do

L4LPEAS5

Kwok - Direct

1 so, and I'll honor that request.

2 MR. KLEIN: Much appreciated, your Honor.

3 THE WITNESS: (In English) Yes, your Honor.

4 THE COURT: So let me just ask you directly, Mr. Guo.  
5 Has the court interpreter explained to you that if you want to  
6 consult with Mr. Klein at any time, all you have to do is tell  
7 me that, and we will take a break and I will give him an  
8 opportunity to do so and you an opportunity?

9 THE WITNESS: (In English) Yes, your Honor.

10 THE DEFENDANT: Yes, your Honor.

11 THE COURT: All right. Mr. Fishman, would you please  
12 swear the witness.

13 KWOK HO WAN,

14 called as a witness by the Plaintiff,

15 having been duly sworn, testified as follows:

16 THE DEPUTY CLERK: Will you please state your full  
17 name for the record and spell it out, please.

18 THE WITNESS: So K-w-o-k, H-o, W-a-n, Kwok Ho Wang.

19 THE DEPUTY CLERK: Thank you. Please be seated.

20 THE WITNESS: (In English) Thank you.

21 THE COURT: Counsel, you may inquire.

22 DIRECT EXAMINATION

23 BY MS. CLINE:

24 Q. Good afternoon, Mr. Guo. Do you support the Chinese  
25 Communist Party?

L4LPEAS5

Kwok - Direct

1 A. (In English) No.

2 (Through Interpreter) No.

3 Q. Do you consider yourself to be a Chinese dissident?

4 A. (In English) Yes.

5 (Through Interpreter) Yes.

6 THE INTERPRETER: Counsel, do you mind if I ask the  
7 witness to speak in Chinese, or shall I just repeat what he  
8 says?

9 THE COURT: Sorry. Do I refer to you as Mr. Kwok or  
10 Mr. Guo?

11 THE WITNESS: It's the same, your Honor. It's the  
12 same name. It's just the pronunciation in Hong Kong or the  
13 pronunciation from China.

14 THE COURT: Mr. Guo, if you answer the questions in  
15 English, which obviously makes life easier for everybody, I'm  
16 not going to ask the interpreter to translate it. The answer  
17 will stand in English. If you need the assistance of the  
18 interpreter to give your best answers, then you should answer  
19 in Chinese and use the interpreter, and the interpreter will  
20 translate for you. I'm indifferent.

21 THE WITNESS: So can I choose it? Some of the things  
22 that I can say in "yes" or "no" I can say by myself. I can say  
23 "yes" or "no"; so I think it is to save the Court time, but if  
24 there is something that I can't say in "yes" and "no," I'm  
25 certain that I will use the interpreter.

L4LPEAS5

Kwok - Direct

1 THE COURT: That's fine. Counsel, you may proceed.

2 MS. CLINE: Your Honor, may we have the last question  
3 and answer, just to make sure we're on the same track here?

4 THE COURT: Would the court reporter read back the  
5 last question and answer.

6 (Record read)

7 THE COURT: You may inquire.

8 MS. CLINE: Okay.

9 BY MS. CLINE:

10 Q. What does it mean to you to be a dissident?

11 A. Well, anyone who disagrees with communist party; that  
12 believe that they have committed, for example, genocide and the  
13 killing of the Christians, Catholics, the other religious  
14 people; and anyone that don't agree with one party ruling, that  
15 has no freedom of religion, those are the dissidents.

16 Q. In the role of being a dissident, do you work to expose  
17 corruption within the Chinese Communist Party?

18 A. Yes.

19 Q. Can you please describe your efforts to expose corruption?

20 A. Well, since 2017, I started to be a whistleblower, and I  
21 talked about the Chinese company HMA. And this company's  
22 assets increased 20 times, to the extent of like trillions of  
23 dollars, and that is because the Vice Chairman of China, Wang  
24 Qishan; so I disclosed that.

25 And so since 2017 to present time, I have disclosed

L4LPEAS5

Kwok - Direct

1 the incidents that shows the corporate from the officials of  
2 China, the corruption they involved, and the overseas assets,  
3 the assets in Hong Kong. There were over thousands of these  
4 corporate that involve -- there were thousands of corporations  
5 that they were involved in my whistleblowers campaign, and I  
6 have already disclosed 2,900 and more of such with videos. So  
7 that is what I did from 2017 to present time.

8 Q. Do you use any social media platforms in the course of  
9 exposing CCP corruption?

10 A. (In English) Yes.

11 (Through Interpreter) Yes.

12 Q. Can you briefly describe what those were or are?

13 A. YouTube and Twitter and Live Stream and GTV, and Instagram,  
14 around these.

15 Q. In 2017 and 2018, how frequently were you posting regarding  
16 CCP corruption on social media?

17 A. Every day.

18 (Continued on next page)

L4LKEAS6

Guo - Direct

1 BY MS. CLINE:

2 Q. After you started your CCP expose program, did you  
3 experience anything that made you believe that the CCP was  
4 retaliating against you?

5 A. Yes.

6 Q. Did anything bad happen to your family in the 2017-2018  
7 time frame?

8 A. Yes.

9 Q. What was that?

10 A. Well, they have arrested 270 of my colleagues and then,  
11 also, 18 family members, including my wife, my daughter, my  
12 brother, my sister-in-law, et cetera. Altogether, 18 family  
13 members.

14 Q. Were you personally ever threatened with arrest?

15 A. Yes, many.

16 Q. Describe any occasions in 2017 in which you were threatened  
17 with arrest.

18 A. Well, since 2017, 2nd of February, I started to be the  
19 whistleblower, Chinese Communist Party using all different  
20 channels to communicate with me and threaten to kidnap or  
21 arrest me and my family.

22 Well, for example, the Ministry of Security, the  
23 minister, Liu Yanping, had come to meet me twice in London.  
24 During those occasions, he threatened to -- and also using some  
25 of the offices in the U.K. to shadow -- to follow me and to



L4LKEAS6

Guo - Direct

1 threaten me. And also other incidents prior to the VOA  
2 incident happened on the 19th of April, they often using the  
3 threat of killing or arrest my family, so that I can stop  
4 broadcasting whistleblowing.

5 CHECK INTERPRETER: I believe the witness mentioned  
6 vice minister, vice minister.

7 THE INTERPRETER: Okay. Vice Minister Liu Yanping.

8 THE WITNESS: And, also, including just hours before a  
9 VOA live broadcasting, which was supposed to be three hours,  
10 they had also sent out a red notice to arrest -- to arrest me  
11 and also arrest my colleague and family, and also confiscate my  
12 family asset of the amount of, like, tens of billions of  
13 dollars. And also during that time, when they were making the  
14 arrest, they beat my colleagues, and some of them were even  
15 beaten to be disabled, very much injured. So many incidents  
16 like that, I cannot even tell you.

17 And I can also tell you one incident, so that you can  
18 understand the enormity of their threat to me. For example, in  
19 early April, and that is before I suppose to be having the  
20 broadcast with VOA on the 19th of April, it was around that in  
21 April 13, they had actually -- the Chinese Communist Party and  
22 the public security officers, they came to my home, and then  
23 standing with guns in front of my mother and my father -- my  
24 father, at the time, was already in bed, bedridden, and my  
25 mother was also in wheelchair, and they were in their eighties,

L4LKEAS6

Guo - Direct

1 and they were carrying gun, standing in front of them, and make  
2 my mother to call me, and then during that phone call, they  
3 told me to stop the broadcasting, so, otherwise, they're going  
4 to do whatever to my parents.

5 And so such incidents, there were many.

6 THE INTERPRETER: Let me consult.

7 (Pause)

8 THE WITNESS: And if I don't stop, they would arrest  
9 my parents again.

10 And, also, since that incident, my mother was so  
11 scared, that she cried all the time, and then she was crying so  
12 much, that she's blind. And, also, a year after that, and then  
13 she had a heart attack or then she passed away.

14 And, also, that during that time, in March and April,  
15 that kind of time, the Communist Party had asked me -- had  
16 actually threatened me to tell me to write all this kind of  
17 letters and other cooperation. Many, many incidents, I cannot  
18 even tell you how many, just so that I can stop the  
19 broadcasting.

20 And then, also, that I want to report to the judge  
21 here that you see, my brother, my sister-in-law, and my nephew,  
22 and my niece, they were in Dalian, you know, that they were  
23 being put in the court, appearing in court 11 times, and to be  
24 tried, and then they put into prison, to have a prison sentence  
25 from three to five years.

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Guo - Direct

1           And then, of course, such incident was so many, that I  
2   don't think that I can even finish it within several hours. So  
3   I don't really want to waste the Court's time, but I want to  
4   tell you one last thing. That is, that during that time, that  
5   Elliott Broidy and Jho Low, and then they were here trying to  
6   lobby and have me deported back into China.

7           And then during that kind of time, concurrently  
8   happening in Kaifeng City and Dalian City in China, they also  
9   arrest my -- the fourth time, arrest my colleagues and my  
10   families, and then they were being beaten and also seized my  
11   assets amounted to \$13.1 billion. And all these are  
12   information anyone can find in a public domain.

13           THE COURT: Mr. Greim?

14           MR. GREIM: Yes, your Honor. I just -- I wanted to  
15   object that it called for a narrative, and it came in in such a  
16   way, that we have no way of sorting out the personal knowledge  
17   from the hearsay. It all kind of came in in dribbles. I just  
18   object to calling for a narrative and hearsay.

19           THE COURT: Well, I'm not going to strike the  
20   testimony, but be more careful in terms of your questions.

21           And, Mr. Guo, let me instruct you that you should just  
22   answer the questions that are asked of you, and we want to know  
23   what you know of your personal knowledge. Okay?

24           Counsel, you may inquire.

25           MR. KLEIN: Your Honor, may I confer briefly?

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Guo - Direct

1 THE COURT: Yes.

2 Do you need the assistance of the interpreter?

3 MR. KLEIN: I do, your Honor.

4 THE COURT: Okay. The interpreter may assist.

5 (Pause)

6 MR. KLEIN: Thank you, your Honor.

7 THE WITNESS: Thank you, your Honor.

8 THE COURT: Mr. Klein, did you have your consultation?

9 MR. KLEIN: Yes, your Honor.

10 THE COURT: Very well.

11 You may inquire, counsel.

12 BY MS. CLINE:

13 Q. Mr. Guo, you mentioned the VOA interview. Does that mean  
14 Voice of America?

15 A. Yes.

16 Q. Describe what you personally experienced on the day you  
17 were supposed to have the VOA interview.

18 THE COURT: Let me caution you to keep your answer  
19 short. Counsel can ask follow-up questions if need be.

20 THE WITNESS: Yes, your Honor.

21 Well, because at the time, the Chinese people yearned  
22 to learn about the freedom and rule of law, and through the  
23 VOA, Voice of America, it was the beacon for Chinese people.

24 So in April, they invited me to have an interview, and  
25 that happened, the incident of April 19, 2017, and it was a

L4LKEAS6

Guo - Direct

1 three hours' interview.

2 BY MS. CLINE:

3 Q. Did the interview end up being three hours?

4 A. No.

5 Q. What happened?

6 A. So because it was influenced by the embassy of China and  
7 also the foreign minister, they even sort of disconnected the  
8 cable for the recording, so the interview at the end was not  
9 even an hour long.

10 Q. At some point after the day of that interview, did a  
11 minister of the Chinese -- the People's Republic of China come  
12 to visit you in New York?

13 A. Yes.

14 Q. Who was that?

15 A. It was Liu Yanping, who was the minister of security, the  
16 intelligence perhaps, and also being the secretary, as well,  
17 and altogether, there are four people.

18 Q. Are you aware of any transcriptions or recordings of a  
19 portion of that meeting that day?

20 A. There was recording, audio recording, and also video.

21 MS. CLINE: Your Honor, may I ask the witness to  
22 access a hard copy of an exhibit? And this will be  
23 Exhibit DX 114.

24 THE COURT: Yes.

25 MS. CLINE: Just for way of reference, I'm going to

L4LKEAS6

Guo - Direct

1 direct the witness' attention to the page that's Bates labeled  
2 SVUS001362, and on the witness' copy, I put an orange sticker,  
3 so he could find it.

4 THE COURT: Counsel, is it DX 114?

5 MS. CLINE: Yes, your Honor.

6 THE COURT: For some reason, that's not in the binders  
7 that I've been provided. Maybe your colleague has another  
8 copy.

9 MR. CHUFF: Is it the last tab, your Honor?

10 THE COURT: Oh, it is the last tab. I've got it.  
11 Thank you.

12 MS. CLINE: Are we all on page 1362?

13 THE WITNESS: Yes.

14 BY MS. CLINE:

15 Q. Now, prior to your testimony today, Mr. Guo, were you able  
16 to review this transcription?

17 A. Yes.

18 Q. Is it an accurate transcription of the conversation that  
19 you had with Mr. Liu?

20 A. Yes.

21 Q. If you could please turn the page to 1363, the next page.  
22 I'll direct your attention to the -- let's see. There's a  
23 designation on the left-hand side that says 2:30?

24 A. Yes.

25 Q. I'm going to read the transcription in English there. It

L4LKEAS6

Guo - Direct

1 says -- first of all, next to the 2:30, there are the initials  
2 LYP. Do you see those?

3 A. Yes.

4 Q. Do you understand what they stand for?

5 A. Yes.

6 Q. What is it?

7 A. This is our legal document. Does it mean that?

8 Q. Well, my understanding is that the transcription reflects a  
9 conversation between -- back-and-forth between Mr. Liu and then  
10 you. Is that your understanding?

11 A. Yes. And LYP, that stands for Liu Yanping, right?

12 Q. Okay. And then at the bottom, you'll see GWG?

13 A. So, yes, it is an acronym for my -- the English spelling of  
14 my Chinese name.

15 Q. Okay. So let's go back up to the column with the 2:30. I  
16 will read it into the record in English. It says, "This is the  
17 premise. I think personally that I am appointed by the country  
18 to carry out this duty and resolve the issue. My goal is to  
19 seek a solution to the problems. Don't trust others, and don't  
20 listen to them. First, I promise to ensure your safety,  
21 including your family's safety."

22 And then I'll continue: "Do you get me? This, same  
23 thing, let's clarify these issues at the legal and judicial  
24 level and then resolve them. Do you get it? Solve them and  
25 put them to an end. Certainly you can rest assured that your

L4LKEAS6

Guo - Direct

1 personal and family safety will be well protected."

2 A. Yes.

3 Q. Did he say those things to you?

4 A. Yes.

5 MS. CLINE: Your Honor, I would offer DX 114, but only  
6 the portion that relates to video 8.

7 THE COURT: Okay. That's received subject to motion  
8 to strike.

9 Any issues on authenticity for that?

10 MR. GREIM: No, none on authenticity.

11 (Defendant's Exhibit 114 received in evidence)

12 BY MS. CLINE:

13 Q. Mr. Guo, how did you feel after he said those things to  
14 you?

15 A. Well, you see, at the time, my family were all detained,  
16 arrested, so when I heard what he said, I felt I was very  
17 scared, very frightened. I could not even describe it. You  
18 see, particularly that when I was really -- when I understand  
19 what that really mean in the Chinese cruel -- the cruel  
20 legality in China, when they say they can protect your family,  
21 that means that they can kill them all.

22 Q. Did you feel pressured as a result of that conversation to  
23 take any actions to protect your family?

24 A. Of course. I was so very afraid.

25 Q. After that meeting, did you ever sign a document which you



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Guo - Direct

1 pledged allegiance to Chairman Xi?

2 A. Well, in fact, even before that, in March. And I started  
3 to have this discussion with him all the way to August. In  
4 between this time, I must have signed four to five documents --  
5 of such documents.

6 Q. Why would you agree to say that if you're really a  
7 dissident?

8 A. Well, I don't really have a choice. I make those  
9 statements under duress.

10 You see, those were documents already written,  
11 presented to me at the time that my wife, my daughter, were --  
12 they were arrested. And, also, that it was a condition that  
13 they would release my wife, and my daughter, and my colleagues.

14 But the thing is that it had never caused me to waver  
15 from any of the anti-CCP objectives and the purpose of that.  
16 It never caused me to waver any of that. In fact, the result,  
17 you can actually see from my action.

18 Q. Subsequent to this meeting, did you become aware of an  
19 effort to extradite you back to China?

20 A. Well, at the time of the meeting, Liu Yanping had already  
21 explicitly state claims that they have the assistance of the  
22 largest PR firm, that is Elliott Broidy, and then also backed  
23 by the president or military, the purpose to extradite me back  
24 into China.

25 So that is why I need to compromise.

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Guo - Direct

1 MR. GREIM: Your Honor, again, I can't always hear  
2 this until we're all done, but I object to hearsay about what  
3 Liu Yanping told him.

4 THE COURT: I'm not receiving it for the truth, but I  
5 will receive it for the witness' state of mind and for the fact  
6 that he says it was said to him, but not for the truth.

7 THE WITNESS: Can I tell you something, your Honor?

8 THE COURT: No, you cannot. The way these proceedings  
9 work is you're going to answer the questions of counsel, and if  
10 you've got a question about the proceedings where you need to  
11 consult with your personal counsel, you can do so.

12 THE WITNESS: But I want to say something to my  
13 counsel, Mr. Klein.

14 THE COURT: Are you asking for advice as to whether to  
15 invoke a privilege?

16 THE WITNESS: No. I just want to clarify that  
17 whatever I said just now, they were my personal experience.  
18 There is not one thing that was hearsay.

19 THE COURT: Okay. So, listen, if you've got questions  
20 for Mr. Klein that are not of a privilege nature, we're going  
21 to break a little bit after 5:00 o'clock, you can talk to  
22 Mr. Klein about them then, but the way it works is that you  
23 answer counsel's question, and then if there are further  
24 opportunities for questions, you'll answer the additional  
25 questions.

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Guo - Direct

1           You may proceed.

2           THE WITNESS: Yes, your Honor.

3 BY MS. CLINE:

4 Q. During the 2017-2018 time period, was your personal data  
5 ever subject to a cyber attack?

6 A. Yes.

7 Q. Can you describe that very briefly?

8           MR. GREIM: Your Honor, I'm sorry, I just want to  
9 object here because I want to make sure that there's a  
10 foundation -- I'm sorry, I withdraw it. I'll have to wait and  
11 hear what he says.

12           THE WITNESS: Well, at the time, the Wi-Fi at my home,  
13 my cell phone, and also that the Wi-Fi of wherever I go, they  
14 were hacked, and controlled, and impacted by these hackers.  
15 And, also, at the time that my YouTube and Twitters, they were  
16 hacked, also. In fact, I was the person who was being hacked  
17 the most in the world.

18 Q. Was there ever a law firm who represented you who was the  
19 victim of a cyber attack?

20 A. Yes.

21 Q. Do you recall the name of the law firm?

22 A. I use English -- maybe it's not accurately pronounced --  
23 Clark Hill in Washington, D.C. is the law firm representing --  
24 it's an immigration law firm.

25 Q. Is it Clark Hill?

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Guo - Direct

1 A. Yes.

2 Q. Are they representing you in connection with your -- were  
3 they representing you in connection with your asylum  
4 application?

5 A. Yes.

6 Q. Now, I'd like to shift gears a little bit and talk about  
7 the research agreement that's at issue in this lawsuit.

8 A. Yes.

9 Q. Did the research agreement that's at issue in this case fit  
10 into your CCP expose program?

11 A. Yes.

12 Q. Very briefly, describe how.

13 A. Well, it was like I said before, at the beginning of 2017,  
14 I had started this expose campaign against HNA under Vice  
15 President of China, Wang Qishan. And he and his family's asset  
16 in overseas and the asset of Agent A, those were illegal asset,  
17 those campaign.

18 And then so the asset was amounted to -- such illegal  
19 asset was amounted to like trillions.

20 Q. And how were you first introduced to Ms. Wallop and  
21 Mr. Waller?

22 A. It was in around December 2017, I was introduced to them by  
23 Mr. Han Chunguang and Mr. Bill Gertz, although I don't recall  
24 the accurate time.

25 Q. What did you and they discuss in your initial meetings?

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Guo - Direct

1 A. Well, you see that my English wasn't good, so at the time  
2 that -- I did not say a lot, it was mainly Mr. Han Chunguang,  
3 and he was a supporter of ours, and, also, he supported the  
4 anti-CCP's corruption. So mainly he talked more, and he knew a  
5 lot anyway.

6 So for my mind -- at the time, the take of mind was to  
7 have a great launch, and then -- so I only said that we wanted  
8 to investigate legally all those asset of, like, HNA and Wang  
9 Qishan.

10 Q. And did Mr. Waller and Ms. Wallop describe their  
11 qualifications to conduct an investigation?

12 A. Yes.

13 Q. And did you ultimately decide that they were qualified to  
14 be hired to do an investigation?

15 A. Well, they claimed that they had connection with the  
16 defense department, CIA, FBI, princes in the Middle East, and  
17 they also claimed that they had hundreds of employees, the  
18 largest investigative business. So, of course, I believe in  
19 them.

20 Q. What were you hoping to do with the information that you  
21 thought they would find?

22 A. Well, so that we can try and just -- try them with justice,  
23 just like what we're doing today in the United States, of those  
24 corrupted parties.

25 Q. Were you the person who was the lead on negotiating the

L4LKEAS6

Guo - Direct

1 specific details of the contract?

2 A. No.

3 Q. Did you negotiate the pricing or the terms of the payment  
4 arrangements?

5 A. No.

6 THE COURT: May I ask a question?

7 Mr. Guo, when you say that you were going to try them  
8 with justice, just like what we're doing today in the United  
9 States, where did you expect the information you were going to  
10 uncover would lead to charges, which courts?

11 THE WITNESS: Of course, it is in the United States,  
12 your Honor. We will report them to the Department of Justice,  
13 to the FBI, so that they can make investigation, so that those  
14 illegal asset investment that are conducted by Agent A. And,  
15 also, of course, because how they amass these asset, the victim  
16 will be the Chinese people, as well, so that we will report  
17 them to the court, as well, to help those people that have been  
18 victims.

19 Well, in fact, that we have always been in  
20 connection -- have been in contact with the FBI, and then we  
21 have always reported informations to the FBI. That is why that  
22 when Liu Yanping and his entourage came -- when they came to  
23 New York, they were stopped by the Homeland Security officers,  
24 and, also -- in May, and, also, all of their electronics were  
25 taken away from them.

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Guo - Direct

1 THE COURT: You may inquire.

2 BY MS. CLINE:

3 Q. Do you know who did negotiate the agreement?

4 A. Well, it would be William Je and Wang Yan Ping, and also  
5 some of the anti-CCP people, Han Lianchao.

6 Q. Okay. I'm asking -- I know there are a couple of  
7 agreements in this case. I'm asking just about the research  
8 agreement with Strategic Vision.

9 Do you know who was in charge of negotiating that?

10 A. Han Chunguang, Wang Yan Ping, and William.

11 Q. Do you understand that there was also -- there's a loan  
12 agreement that was executed in connection with the research  
13 agreement?

14 A. Yes.

15 Q. And who was in charge of negotiating -- or who was involved  
16 in the loan agreement, if you know?

17 A. For the loan agreement, mainly it would be William --  
18 they -- they were doing the negotiation.

19 Q. Were you involved in identifying the targets of the  
20 investigation, the people to be investigated?

21 A. My involvement was limited to only providing the names of  
22 Wang Qishan and several name of his family. I didn't do -- I  
23 didn't have any other involvement.

24 Q. You may have explained this already, but could you just  
25 briefly tell us who Wang Qishan is?

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Guo - Direct

1 A. He's the Vice President of China, and he's also the  
2 permanent Vice President of China after the change of  
3 constitution, and he is also the chairman of the central  
4 disciplinary committee, and he's also the chairman of the  
5 number one corporate that is Agent A, who has amassed so much  
6 of the asset -- of 20 times of the asset. So he's that person.  
7 So that, in fact, the Agent A, their asset expand 20 times per  
8 day, that kind of a speed.

9 And then, also, that, you know, there was a fund they  
10 owed in New York that has the asset of like hundred million  
11 dollar that was owned by Agent A as well. That is the reason  
12 that why I want to investigate them, the New York.

13 Q. Did you ever meet with Ms. Wallop and Mr. Waller to discuss  
14 the results of their research efforts?

15 A. Yes.

16 Q. What happened at that meeting?

17 A. Well, you see, those two people, they were very busy about  
18 drinking the red wine, and also boasting about their past  
19 glory, and talking about how much they know about the Middle  
20 East royalty, the princes, and how much they were working with  
21 the CIA, the defense department, and helping the presidents and  
22 supporting them. So, really, 99 percent, they were talking. I  
23 was really listening, not talking much.

24 Q. Did there come a time in which they showed you some  
25 information that was contained on a thumb drive that they put



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Guo - Direct

1 into a computer?

2 A. Yes.

3 Q. And what was your reaction when you saw what was on the  
4 thumb drive?

5 A. Well, I thought they were completely rubbish because those  
6 were the information contained -- you can find in Google, and,  
7 in fact, they were information that I have done in my  
8 whistleblowing campaign.

9 Q. After that meeting, did they -- was there another time  
10 where they presented additional data to you?

11 A. Seemed to be like several USB drive.

12 Q. Did any of those USB drives contain any information that  
13 was useful to your campaign to expose corruption?

14 A. Nothing, really. And they -- in fact, every time they  
15 would communicate with Yan Ping and told her that, you know,  
16 this information would have code and encrypted, cannot be open.

17 Q. Did the work that Ms. Wallop and Mr. Waller had done meet  
18 your expectations in any way?

19 A. No. Completely it was a deception.

20 Q. Even though Mr. Waller and Ms. Wallop weren't able to  
21 provide you useful information, did you continue on with your  
22 expose program?

23 A. Yes.

24 Q. From 2017 until now, have you ever wavered in your  
25 opposition to the CCP?

1 A. Well, you know, from 2017 to now, we have continued to  
2 expose the CCP, and telling the truth about the virus, and  
3 telling the truth about how they have, like, victimized the  
4 children in Hong Kong, and how we became the number one enemy  
5 of CCP, how much that they have hacked us in such a great  
6 number, that we were number one, and continued to threaten us.  
7 That, in fact, is the proof of our work and that we have done  
8 to the CCP.

9 MS. CLINE: No further questions, your Honor.

10 THE COURT: Mr. Greim, are you going to do the cross?

11 MR. GREIM: Yes, your Honor.

12 THE COURT: Let's start with five or ten minutes, and  
13 we'll take a break for the day.

14 MR. GREIM: Sure.

15 MS. CLINE: Mr. Fishman --

16 THE COURT: Would you clean off the podium.

17 (Pause)

18 THE COURT: You may inquire.

19 CROSS-EXAMINATION

20 BY MR. GREIM:

21 Q. Mr. Guo, you've testified consistently that you began your  
22 whistleblowing campaign in 2017, correct?

23 A. Yes.

24 Q. But 2017 is not when you came to the United States, is it?

25 A. I don't know what you mean. I did come to the United

L4LKEAS6

Kwok - Cross

1 States in 2017, but, in fact, I had been to the United States  
2 even before that.

3 (Continued on next page)

L4LPEAS7

Kwok - Cross

1 Q. Did there come a time when you claim to have fled China?

2 A. (In English) Yes.

3 (Through Interpreter) Yes.

4 Q. In what year?

5 A. 2014.

6 Q. At the end of 2014?

7 A. December.

8 Q. Now, Mr. Guo, isn't it a fact that you were detained in  
9 China and then released in January of 2015?

10 A. Absolutely rubbish. In fact, I was in London in  
11 January 2015, but it was Elliott Broidy, those people, who said  
12 that my family were arrested.

13 MR. GREIM: Motion to strike. I don't understand what  
14 the last part has to do with my question.

15 THE COURT: Overruled.

16 Q. Mr. Guo, you currently have Hong Kong citizenship; is that  
17 right?

18 THE INTERPRETER: I'm sorry, counsel, what did you  
19 say, Hong Kong what?

20 Q. Citizenship.

21 A. (In English) Yes.

22 (Through Interpreter) Yes.

23 Q. And a Hong Kong passport?

24 A. (In English) Yes.

25 (Through Interpreter) Yes.

L4LPEAS7

Kwok - Cross

1 Q. In what countries do you hold citizenship?

2 A. At this moment, I have citizenship of Hong Kong only.

3 Q. And so between December 2014, when you say you left China,  
4 and early 2017, where were you?

5 A. In the UK, in the United States, in Europe and Japan and I  
6 also have been to UAE in the Middle East.

7 Q. Now, you bought an apartment in the Sherry Netherland Hotel  
8 in March of 2015, correct?

9 MS. CLINE: Objection to form.

10 THE COURT: Overruled.

11 A. So I'm asserting the Fifth Amendment not to answer this  
12 question.

13 Q. Mr. Guo, let me -- I don't want to ask a lot of questions  
14 that provoke that issue, and I'm going to try to steer clear as  
15 I learn what those might be.

16 Let me ask you, is it true that you have not moved a  
17 penny out of Hong Kong or the mainland since you began  
18 whistleblowing?

19 A. So I'm invoking the Fifth Amendment.

20 Q. Mr. Guo, you've had an attorney say substantially those  
21 words on your behalf to the Wall Street Journal?

22 A. I'm invoking the Fifth Amendment.

23 Q. Why did you not begin whistleblowing until January of  
24 2017 -- or I'm sorry. Let me withdraw that. I'm just going to  
25 withdraw the question.

L4LPEAS7

Kwok - Cross

1           Why did you not begin whistleblowing until February of  
2   2017?

3   A.   Well, you see, in January 2015, the Chinese CCP, they  
4   arrested my family, and they continue these kinds of arrests to  
5   2016, and they threatened to expatriate me to China. In fact,  
6   starting from January 2015, Bruno Wu, Elliott Broidy, Jho Low,  
7   and they called me directly threatening me that they're going  
8   to arrest all my family.

9           And so this situation continued, and so I tried to do  
10   my best to have my family released. So in February 2nd, 2017,  
11   that's the next day my daughter was released, I started the  
12   whistleblowing campaign.

13   Q.   Mr. Guo, is it your sworn testimony here, under oath, that  
14   starting in January of 2015, Jho Low, Elliott Broidy and Bruno  
15   Wu began to personally contact you and threaten you?

16   A.   Calling me personally was Bruno Wu. In fact, that Bruno Wu  
17   had called me many times even before that and when he called me  
18   and told me over the phone personally that Elliott Broidy, who  
19   has the biggest political power influence in the United States,  
20   and Jho Low, who is the head of the intelligence overseas, he  
21   told me that.

22           So Bruno Wu, he's actually a registered person in the  
23   intelligence for China overseas, and so he is the same as Liu  
24   Yanping and the words that they were telling were the same.

25   Q.   Mr. Guo --

L4LPEAS7

Kwok - Cross

1 THE INTERPRETER: I'm sorry, counsel.

2 A. And that Liu Yanping was Bruno Wu's leader.

3 THE COURT: So, Mr. Guo, the question to you was a  
4 simple question, it was whether, starting in January 2015, Jho  
5 Low, Elliott Broidy and Bruno Wu began to personally contact  
6 you and threaten you. I think you can just simply, next time,  
7 answer that question and not give us a speech.

8 THE WITNESS: (In English) Yes, your Honor. Sorry.

9 A. (Through Interpreter) Yes.

10 Q. Mr. Guo, did you listen to the court proceedings yesterday?

11 A. No.

12 Q. Did you listen to them the day before?

13 A. No.

14 Q. Has anyone discussed with you the testimony and the  
15 evidence presented in this courtroom on Monday or Tuesday of  
16 this week?

17 A. No.

18 THE COURT: Mr. Greim, when you come to a convenient  
19 breaking point, we'll break for the day. Now is a good time.

20 MR. GREIM: This is as good a time as any. I'm okay.

21 THE COURT: All right. We'll break for the day. We  
22 will reconvene tomorrow morning at 9:30.

23 Mr. Guo, you're going to be excused. I need to have a  
24 minute with the lawyers. I'll expect you and your counsel a  
25 couple of minutes before 9:30. Make sure you're ready to go

L4LPEAS7

Kwok - Cross

1 promptly at 9:30.

2 THE WITNESS: (In English) Thank you, your Honor.  
3 Thank you.

4 (Witness temporarily excused)

5 THE COURT: Counsel, stay here for just a minute.

6 Mr. Greim, is there any further word with respect to  
7 Sasha Gong, the last witness?

8 MR. GREIM: She came to New York anyway, and she's  
9 here. She will be able to testify.

10 THE COURT: Very well. Good. And I expect that  
11 tomorrow, by the end of the day, after the testimony of Sasha  
12 Gong, we'll discuss the testimony of Yvette Wang and the open  
13 questions with respect to Yvette Wang. So counsel should be  
14 prepared to address that with me.

15 Anything else from plaintiff before we break for the  
16 day?

17 MS. CLINE: No, your Honor.

18 THE COURT: Anything else from defendant?

19 MR. GREIM: No, your Honor.

20 THE COURT: Okay. Have a good evening, everybody.

21 (Adjourned to April 22, 2021, at 9:30 a.m.)  
22  
23  
24  
25



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