

Exhibit 43

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** CONFIDENTIAL **

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,)

Plaintiff,)

- vs-)

No. 1:13-CV-06326

PREVEZON HOLDINGS, LTD, FERENCOI)

(TPG)

INVESTMENTS LTD, KOLEVINS LTD,)

et al.,)

Defendants.)

- - - - -x

Confidential Videotaped Deposition through
Interpreter, Video Conference, of YIANNA
ALEXANDROU, taken by Defendants, at the offices of
Baker Hostetler, 45 Rockefeller Plaza, New York,
New York, on October 12, 2015, commencing at 8:51
a.m., before Jeffrey Benz, a Certified Realtime
Reporter, Registered Merit Reporter and Notary
Public within and for the State of New York.

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 2 (A recess was taken.)
 3 THE VIDEOGRAPHER: The time is
 4 12:10 p.m. and we are back on the record.
 5 Q. As we were going -- strike that.
 6 If you could take a look again at
 7 Exhibit 4. And if you could turn to the
 8 page 93447.
 9 Do you recognize this document?
 10 A. Please repeat the number.
 11 Q. Sure.
 12 If you could take a look at the page
 13 marked 93447, it states "Memorandums and
 14 Articles of Association of Glendora Holdings
 15 Limited" on the front cover, and that document
 16 runs through 93464.
 17 A. Yes.
 18 Q. Do you recognize this document?
 19 A. Yes.
 20 Q. And what is it?
 21 THE INTERPRETER: I didn't hear the
 22 first word she said.
 23 Q. Can you repeat that, please?
 24 A. Foundation and statute of the company.
 25 Establishment and statute of the

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 2 company.
 3 Q. And --
 4 THE INTERPRETER: She said "Memorandum
 5 and Articles of Association."
 6 Q. And if you could turn to the
 7 page 93454. And there, there's a paragraph 4.
 8 Do you see that?
 9 A. Yes.
 10 Q. And it says, "The liability of the
 11 members is limited."
 12 Do you see that?
 13 A. Yes.
 14 Q. Do you know what that means?
 15 A. No.
 16 Q. When you had your conversations with
 17 the U.S. Attorney's Office representatives, what
 18 language were you speaking with them?
 19 A. I was speaking in Greek and it was
 20 translated by...
 21 Q. Who was it translated by?
 22 A. I don't recall who was translating.
 23 Q. Was someone on your side or was
 24 someone on the government side translating?
 25 A. Our side.

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 2 MR. LEVINE: If you could take a look
 3 at what I sent in a -- sent this morning as
 4 Document 15. It's a -- it's a
 5 nonconsecutive set of documents I put
 6 together just to try to send a range of
 7 documents, which we'll mark as Exhibit 15.
 8 (Document Bates-stamped PREV 54711
 9 through -31 was marked Alexandrou Exhibit 15
 10 for identification, as of this date.)
 11 Q. The document on the front, it's
 12 Bates-stamped PREV 54711.
 13 Do you know what that is?
 14 A. No.
 15 Q. Have you ever seen that document? And
 16 it's -- goes 31 pages from PREV 54711 through
 17 -31.
 18 Have you ever seen that document
 19 before?
 20 MS. PHILLIPS: Objection to form.
 21 A. Possibly. I don't remember.
 22 Q. I mean -- do you remember -- in
 23 connection with what, you would have seen this
 24 document?
 25 MS. PHILLIPS: Objection to form.

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 2 A. No.
 3 Q. And if you could turn to the back of
 4 the document, and a couple pages in from the
 5 back, there's a document, US-PREV 159077.
 6 A. Yes.
 7 Q. Do you recognize the signature on that
 8 page?
 9 MS. PHILLIPS: Objection to form. I
 10 think there's -- well, there -- there seems
 11 to be more than one signature on the page.
 12 A. It looks to be the signature of
 13 Chrystalla Argyridou.
 14 Q. If you could turn to the next page,
 15 the document Bates-stamped US-PREV 159080.
 16 Do you recognize this -- are you
 17 there?
 18 A. Yes.
 19 Q. Do you recognize the signature on the
 20 bottom of that page?
 21 MS. PHILLIPS: Objection to form.
 22 A. Yes. It appears to be mine.
 23 Q. Did you, in fact, sign this document?
 24 MS. PHILLIPS: Objection to form.
 25 A. I don't recall.

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2 Q. Do you have any reason to believe that

3 is not your signature?

4 MS. PHILLIPS: Objection to form.

5 A. No.

6 Q. Take a look, again, at Document -- I

7 believe it's Document 6.

8 And if you could take a look at your

9 affidavit, it's 93292 through 93299.

10 And if you can take a chance and take

11 a look and review that document for me, please.

12 (Witness reviewing document.)

13 MS. PHILLIPS: Do you want to direct

14 her to a specific part?

15 MR. LEVINE: I'm just asking her to

16 review the document, please.

17 A. Yes.

18 Q. This was a document that your employer

19 asked you to sign; is that correct?

20 A. Yes.

21 Q. And prior to signing this document,

22 you didn't -- did you do any investigation into

23 the contents of this document?

24 MS. PHILLIPS: Objection to form.

25 Q. You can answer.

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2 MS. PAPENDREOU: Can you repeat the

3 question?

4 Q. Prior to signing this document, you

5 did not do any investigation into the contents

6 of this document.

7 MS. PHILLIPS: Objection to form.

8 A. No. I am informed by my employer.

9 Q. Did you -- were you aware of any of

10 the statements in this document prior to being

11 informed by your employer?

12 MS. PHILLIPS: Objection to form.

13 A. Please repeat the question.

14 Q. Prior to being informed by your

15 employer, were you aware of any of the

16 statements in this document?

17 MS. PHILLIPS: Objection to form.

18 MR. LEVINE: Hello, are we still on

19 the record?

20 THE VIDEOGRAPHER: Yes.

21 Q. Okay. And the question I asked you

22 before we left to go off the record is prior to

23 being informed --

24 MS. PAPENDREOU: We can't see you.

25 Can you turn on the camera, please?

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2 THE INTERPRETER: You can't see us,

3 you said?

4 MS. PAPENDREOU: We can't see you now.

5 THE INTERPRETER: You can't see us

6 now. Okay.

7 MR. PAPENDREOU: I think your camera

8 is turned off.

9 THE INTERPRETER: We can see you.

10 MS. PAPENDREOU: Yes. Now we can see

11 you. Thank you.

12 THE INTERPRETER: Okay. Okay.

13 Q. Okay. And the question I asked you

14 before we got temporarily disconnected is, prior

15 to being -- to being informed about this

16 document from your employer, were you aware of

17 any of the statements contained in this

18 document?

19 MS. PHILLIPS: Objection to form.

20 A. No.

21 Q. Prior to being informed about this

22 document by your employer, did you have personal

23 knowledge of any of the statements in this

24 document?

25 MS. PHILLIPS: Objection to form.

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2 A. No.

3 Q. Okay. If you could turn to -- if you

4 could turn to the next document, it's the

5 witness statement dated 5 June, 2008. It runs

6 in Exhibit 6 from US-PREV 093300 through -9305

7 [sic].

8 A. Yes.

9 Q. You were asked by your employer to

10 sign this document?

11 MS. PHILLIPS: Objection to form.

12 A. Yes.

13 Q. And you did no investigation into the

14 contents of this document prior to signing the

15 document. Is that correct?

16 MS. PHILLIPS: Objection to form.

17 A. No.

18 Q. And did -- is that correct, that you

19 did not do an investigation into this document?

20 Did you do any investigation into this

21 document prior to signing it?

22 MS. PHILLIPS: Objection to form.

23 A. No.

24 Q. And did you have any personal

25 knowledge of any of the statements contained in