

Exhibit 48

1 TODD HYMAN - CONFIDENTIAL

2 UNITED STATES DISTRICT COURT

3 SOUTHERN DISTRICT OF NEW YORK

4 ----- X

5 UNITED STATES OF AMERICA,)

6 Plaintiff,) NO. 1:13-CV-06326

7 -vs-) (TPG)

8 PREVEZON HOLDINGS, LTD, FERENCOI)

9 INVESTMENTS LTD, KOLEVINS LTD,)

10 et al.,)

11 Defendants.)

12 ----- X

13

14 DATE: October 6, 2015

15 TIME: 9:47 a.m.

16

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18 CONFIDENTIAL VIDEOTAPED DEPOSITION OF

19 TODD HYMAN, a 30(b)(6) witness, held at the offices

20 of Baker Hostetler, 45 Rockefeller Plaza, New York, New

21 York, pursuant to Subpoena, before Hope Menaker, a

22 Shorthand Reporter and Notary Public of the State

23 of New York.

24

25

1 TODD HYMAN - CONFIDENTIAL

2 Hostetler.

3 MR. CASSIN: Vern Cassin from Baker
4 Botts.

5 MR. MONTELEONI: Paul Monteleoni for
6 the government.

7 MS. GRAHAM: Margaret Graham for the
8 government.

9 THE VIDEOGRAPHER: Now will the court
10 reporter please swear in the witness.

11 TODD HYMAN, called as a witness,
12 having been duly sworn on October 6, 2015, by
13 a Notary Public, was examined and testified
14 as follows:

15

16 EXAMINATION BY MR. MOSCOW:

17 Q. Good morning, Mr. Hyman.

18 A. Morning.

19 Q. Have you testified before?

20 A. Yes, I have.

21 Q. Have you testified in this matter?

22 A. Yes, I have.

23 Q. Did you start a deposition in -- on
24 March 3, 2014?

25 A. Yes, I did.

Page 110

1 TODD HYMAN - CONFIDENTIAL
 2 unaware --
 3 Q. How many -- how many, in fact, had
 4 their money stolen?
 5 MR. MONTELEONI: Objection.
 6 A. I could not -- I'm not qualified to
 7 say how many independent agencies exist in the
 8 Russian Federation.
 9 Q. I didn't ask that.
 10 Was anyone convicted of stealing this
 11 money?
 12 MR. MONTELEONI: Objection.
 13 A. Yes.
 14 Q. Who?
 15 A. I would -- individual by the name of
 16 Victor Markelov and another individual, last name
 17 is Khlebnikov. Russians --
 18 Q. Were there other people found to have
 19 stolen this money?
 20 A. There were other people that were
 21 involved in this, two of the Russians named.
 22 Q. Do you accept the Russian findings?
 23 A. No, we do not.
 24 Q. Do you reject the Russian findings?
 25 A. Yes.

Page 111

1 TODD HYMAN - CONFIDENTIAL
 2 Q. Who moved the money from the Russian
 3 Treasury to Parfenion?
 4 A. Can you be a little more specific
 5 when you say "who moved"?
 6 Q. Who gave the direction to transfer
 7 funds from wherever the Russian government
 8 agencies, plural, kept their money to Parfenion?
 9 A. I believe that two tax official
 10 involved, Olga Stepanova, and another, and tax
 11 district 25 and 28 that approved refunds that
 12 approved the -- approved the tax refunds, the
 13 amended tax refunds, the fraudulent ones, and
 14 okayed the disbursement of the tax refunds.
 15 Q. Who directed the transfer of the
 16 funds? Who moved the money?
 17 MR. MONTELEONI: Objection.
 18 A. I'm not certain what you're -- when
 19 you say who moved the money, you're referring to.
 20 I would interpret that as to who authorized the
 21 refunds to go out.
 22 Q. Who directed the refunds be paid?
 23 A. The appropriate --
 24 Q. Is the answer that you don't know?
 25 A. Yeah, I don't know the name.

Page 112

1 TODD HYMAN - CONFIDENTIAL
 2 Q. Fine. Is that the same answer for
 3 Rilend?
 4 A. Yes.
 5 Q. Is that the same answer from Makhaon?
 6 A. Yes.
 7 MR. MONTELEONI: Objection.
 8 Q. Okay. Who directed the transfer of
 9 funds from Parfenion on the chart to Fausta?
 10 A. We don't know the name.
 11 Q. Who directed the transfer of the
 12 funds on the chart from Rilend to Univers?
 13 A. I don't know the name.
 14 Q. Who -- who directed the transfer of
 15 fund from Parfenion to ZhK, according to the
 16 chart?
 17 A. I don't know the name.
 18 Q. Who directed the transfer of the
 19 funds from Makhaon to Anika, according to the
 20 chart?
 21 A. I don't know the name.
 22 Q. Are those names on the records of the
 23 banks?
 24 A. Who would order a specific wire
 25 transfer should be on a bank record.

Page 113

1 TODD HYMAN - CONFIDENTIAL
 2 Q. Did you check?
 3 A. I don't recall the names, honestly.
 4 Q. Did you check?
 5 A. I did not.
 6 Q. Did the United States?
 7 A. I don't believe so. I don't recall.
 8 I don't know.
 9 Q. Are those people members of the
 10 organization?
 11 A. Yes, they would be.
 12 Q. Who directed the transfer of money
 13 from Anika to Univers?
 14 A. I don't know the name.
 15 Q. Who directed the member of Fausta --
 16 who directed the transfer of money from Fausta to
 17 Anika, to -- I'm sorry, to Univers?
 18 A. I don't know the name.
 19 Q. But each of those people is a member
 20 of the organization, correct?
 21 A. Yes, I would believe so.
 22 Q. Who directed -- who directed the
 23 transfer of money from Fausta to ZhK?
 24 A. I don't know the name.
 25 Q. Okay. Now, have you since found out

Page 178

1 TODD HYMAN - CONFIDENTIAL
 2 and trans -- and then transfer them over to us
 3 because that took some time.
 4 Q. Did you promise to protect him while
 5 he was in the United States?
 6 A. Well, we promised to look after his
 7 safety.
 8 Q. And are there agents assigned to
 9 transport him?
 10 MR. MONTELEONI: Objection. I'm
 11 going to instruct the witness not to answer
 12 about specific measures that may or may not
 13 be taken for the -- for the safety of the
 14 witness.
 15 Q. Are there agents who are working with
 16 the Gorokhoffs now?
 17 MR. MONTELEONI: Objection.
 18 A. In the context of gathering evidence
 19 or talking with him, yes, there are.
 20 Q. What evidence are they gathering from
 21 Mr. Gorokhov?
 22 A. Any of the statements he makes,
 23 facilitating communication between Mr. Gorokhov
 24 and the United States Attorney's office.
 25 Q. Is he a competent witness to the

Page 179

1 TODD HYMAN - CONFIDENTIAL
 2 events described in Complaint Number Three?
 3 MR. MONTELEONI: Objection.
 4 A. What do you mean by "competent
 5 witness"?
 6 Q. Was he present during any of the
 7 lawsuit -- searches, lawsuits, or transfers of
 8 funds?
 9 MR. MONTELEONI: Objection.
 10 A. Well, he's a witness to certain
 11 transactions because he's seen copies of the bank
 12 records as well, so he's witnessing that.
 13 Q. Okay.
 14 A. He was not present --
 15 Q. When I say "competent witness," he
 16 was not present, he did not see, hear, smell,
 17 touch, or feel anything, correct?
 18 MR. MONTELEONI: Objection.
 19 A. Well, he touched the bank copies of
 20 the bank records.
 21 Q. And the bank records -- withdrawn.
 22 The records in Russia are correct.
 23 Is that your view?
 24 MR. MONTELEONI: Objection.
 25 A. No, not all of them.

Page 180

1 TODD HYMAN - CONFIDENTIAL
 2 Q. Who other than you, Mr. Monteleoni,
 3 Ms. Graham and the other assistants and agents
 4 working with you, who decides which records are
 5 correct?
 6 MR. MONTELEONI: Objection.
 7 A. Well, the investigation attempts to
 8 corroborate these records and in a large
 9 portion -- a large number of the records would
 10 corroborate a record in other bank statements that
 11 came about separate from the Khlebnikov files,
 12 such as the Bunicon and Elenast wire transfers, as
 13 well as copies of Russian court decisions of which
 14 portions of those are also in the files that he
 15 provided.
 16 Q. And do you accept the Russian court
 17 decisions or not?
 18 MR. MONTELEONI: Objection.
 19 A. Which court decisions are you talking
 20 about.
 21 Q. The conviction of Markelov?
 22 A. No, we do not.
 23 Q. The conviction of Khlebnikov?
 24 A. No, we do not.
 25 MR. MONTELEONI: Objection.

Page 181

1 TODD HYMAN - CONFIDENTIAL
 2 Q. In the view of the United States,
 3 were those men innocent?
 4 MR. MONTELEONI: Objection.
 5 A. At this point, the United States --
 6 is not taking the position whether they're
 7 innocent or not. Just that we're not relying on
 8 their conviction.
 9 MR. MONTELEONI: Objection.
 10 Q. So you'll not be using their
 11 convictions at trial?
 12 MR. MONTELEONI: Objection.
 13 A. That will be a question for the
 14 attorneys, what they use and what they don't use
 15 at trial.
 16 Q. Are there times when cases depend on
 17 single facts?
 18 MR. MONTELEONI: Objection.
 19 A. I -- I guess at some points it's
 20 possible that some cases have relied on a single
 21 fact -- provable fact.
 22 Q. Okay. Now, directing your attention
 23 to Exhibit B for the third -- the proposed
 24 Complaint, it demonstrates a whole lot of
 25 different company and a whole lots of