

Exhibit A

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

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14 DATE: October 6, 2015

15 TIME: 9:47 a.m.

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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.

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1 TODD HYMAN - CONFIDENTIAL

2 MR. MOSCOW: With the caveat that I'm
3 not there, yes. The links are set up for
4 counsel and for counsel only.

5 MR. MONTELEONI: And -- and what's
6 your understanding of which counsel are
7 listening remotely?

8 MR. MOSCOW: As before,
9 Ms. Vyacheslava may be listening; she may be
10 packing, I don't know. And Ms. Volshteyn may
11 be listening. I don't know that she is.

12 There also may be additional people
13 at Baker Hostetler about whom I assume you
14 have no interest.

15 (Whereupon, a brief discussion was
16 held off record.)

17 Q. Have you had an opportunity to speak
18 with counsel?

19 A. Yes, I have.

20 Q. Did you issue grand jury subpoenas in
21 this case?

22 A. Yes, we did.

23 Q. When did you first issue grand jury
24 subpoenas.

25 A. Before the filing of the case.

1 TODD HYMAN - CONFIDENTIAL

2 Q. How much before?

3 A. I don't recall the exact day.

4 Q. Does the United States recall the
5 exact date?

6 A. The United States would have
7 knowledge of it. They would have dates; I would
8 have to refresh my memory on -- I don't recall the
9 exact date we did, but just before it took place.

10 Q. Just before?

11 A. I mean sometime before the Complaint.

12 Q. How much before? I mean is it a
13 week? Is it day? Is it a year?

14 A. No. It was a few months before the
15 Complaint I think -- I believe.

16 Q. Did you issue a subpoena calling for
17 the financial records of a lawyer for the
18 defendants?

19 A. Yes, we did.

20 Q. When was that?

21 A. Before the Complaint. Again, I -- I
22 don't recall the exact time that we issued the
23 Complaint -- the subpoena.

24 Q. Did you receive the records?

25 A. Yes, we did.