

A-239

UNITED STATES OF AMERICA, V
JOHN GALANIS, et al.,

May 31, 2018

<p>I5V7GAL3 Driever - Cross Page 809</p> <p>1 you don't remember. 2 A. So portfolio loan accounts, I would not have access to see 3 it. 4 Q. That wasn't my question. My question was: In your six 5 years in private wealth management at Morgan Stanley, have you 6 ever seen a portfolio loan account statement? 7 A. I could have. 8 Q. You don't recall whether you ever have. 9 A. No. 10 Q. Rosemont Seneca Bohai LLC was a client of Morgan Stanley's, 11 true? 12 A. Yes. 13 Q. And that was an entity that you understood was associated 14 with Mr. Archer, right? 15 A. Yes. 16 Q. Rosemont Seneca Bohai LLC was a capital management firm, 17 true? 18 A. I'm not sure. 19 Q. Well, you told the government in one of your meetings 20 before coming to testify that Rosemont Seneca Bohai LLC was a 21 capital management firm, didn't you? 22 A. I knew that it was a private equity type of firm. 23 Q. In your mind, what's the difference between capital 24 management and private equity? 25 A. Private equity is the investment in private businesses, but</p>	<p>I5V7GAL3 Driever - Cross Page 811</p> <p>1 Bohai LLC. 2 Q. And you have seen those kinds of bank statements before? 3 A. The Morgan Stanley statement? 4 Q. The Morgan Stanley statements that the prosecutor showed 5 you. 6 A. Yes. 7 Q. Now, that is not the only account -- strike that. 8 During the time that you covered these accounts in 9 2014 the Rosemont Seneca Bohai LLC account was not the only 10 Morgan Stanley account that was associated with Mr. Archer, 11 true? 12 A. Yes. 13 Q. There were other accounts that were also associated with 14 Mr. Archer, right? 15 A. Yes. 16 Q. Do you remember what they were? 17 A. We had one other account, I believe, Archer Diversified. 18 Q. And was there an account in Mr. Archer's individual name? 19 A. I can't remember. 20 Q. I want to show you -- 21 And now, Mr. Jackson, you can bring this up for 22 everyone, including the jury. 23 -- what has been marked as Exhibit 312. 24 And if you could just blow up the top third of that, 25 please.</p>
<p>I5V7GAL3 Driever - Cross Page 810</p> <p>1 capital could be a number of things. 2 Q. When you spoke to the government you explained that 3 Rosemont Seneca Bohai LLC was a capital management firm, didn't 4 you? 5 A. If you say that I did. 6 Q. Well, don't take my word for it. Let me show you -- 7 And again, Mr. Jackson, just for the witness, the 8 judge and the lawyers -- 9 -- what has been marked as 3505-2. I'm sorry, 3505-1. 10 Take a moment to look at that to yourself, and in particular I 11 want to draw your attention to the highlighted language at the 12 very bottom of the page. Do you see that? 13 A. Yes. 14 Q. This is page 1. Would you agree with me that Rosemont 15 Seneca Bohai LLC was a capital management firm? 16 A. Yes. 17 Q. Thank you. Now, Ms. Mermelstein reviewed with you some of 18 the pages from the bank account statement for RSB, LLC. Do you 19 recall that? 20 A. Yes. 21 Q. And you understand that RSB, LLC refers to Rosemont Seneca 22 Bohai LLC, right? 23 A. Yes. 24 Q. The capital management firm, right? 25 A. Rosemont Seneca Bohai LLC. It refers to Rosemont Seneca</p>	<p>I5V7GAL3 Driever - Cross Page 812</p> <p>1 This is an account profile for RSB, LLC, true? 2 A. This was not his account with my team. 3 Q. This document says account profile, true? 4 A. The account number in the top left was not his account 5 number with my team. 6 Q. At the top left of this page it says account profile, 7 right? 8 A. It does say account profile. 9 Q. And underneath that it says RSB, LLC, correct? 10 A. It does say that. 11 Q. And then there are two names, the names that you've 12 testified about, Devon Archer and Sebastian Momtazi, correct? 13 A. Yes. 14 Q. And next to each of them it says Auth Ind Person. Do you 15 see that? 16 A. Yes. 17 Q. What does that mean? 18 A. That would be shortened for authorized individual person. 19 Q. What does it mean to be an authorized individual person? 20 A. I believe on the form you have to specify what actions the 21 authorized individual could take, the different actions being 22 send wires, money movement, trading activity. 23 Q. These are individuals who have authority to take certain 24 actions on behalf of Morgan Stanley account, true? 25 A. It doesn't say what actions, but yes.</p>