

## A-384

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

June 6, 2018

<p>I667GAL1 Dunkerley - Cross Page 1508</p> <p>1 A. Correct. 2 Q. So, Jason Galanis said you were going to throw Michelle 3 Morton under the bus and that was going to be his narrative, 4 correct? 5 A. Correct. 6 Q. When the authorities came asking him questions, he was 7 going to blame Michelle Morton, true? 8 A. That was one of his narratives, correct. 9 Q. And another big part of his narrative was this company 10 Calvert, correct? 11 A. Correct. 12 Q. And Calvert's sole purpose was to deceive people, correct? 13 A. Yes. 14 Q. And again the only people that you ever discussed Calvert 15 and its illicit purpose with were Gary Hirst and Jason Galanis, 16 true? 17 A. True. 18 Q. Did you ever discuss Calvert and its illicit purpose with 19 Francisco Martin? 20 A. He may have come up in conversation, but I don't 21 specifically remember talking to him about it. Obviously, his 22 cousin ran the firm and was the individual, but I don't 23 remember talking to him about it. 24 Q. When you say ran the firm, I mean there was no firm, right? 25 A. Well, correct, but there is a company that was incorporated</p>	<p>I667GAL1 Dunkerley - Cross Page 1510</p> <p>1 Q. I want to show you -- Mr. Jackson just for the witness, the 2 lawyers and Judge Abrams -- Defense Exhibit 4722. 3 Now, focusing on the bottom e-mail here, this is an 4 e-mail from Dan McClory to you, true? 5 A. Yes. 6 MR. SCHWARTZ: I offer Defense Exhibit 4722. 7 MR. QUIGLEY: No objection. 8 THE COURT: It will be admitted. 9 (Defendant's Exhibit 4722 received in evidence) 10 Q. And this e-mail is about something called BHR, right? 11 A. Yes. 12 Q. And you understand that to be a Chinese private equity 13 firm, right? 14 A. Yes. 15 Q. And it refers to \$6 trillion of AUM with 112 state owned 16 enterprises, correct? 17 A. Yes. 18 Q. And again AUM means assets under management, right? 19 A. Yes. 20 Q. And you see at the bottom it says "Devon was stellar," 21 right? 22 A. Absolutely. 23 Q. And can we turn to the next page. Do you see that picture? 24 A. I do. 25 Q. And you recognize the fellow third from the left as the</p>
<p>I667GAL1 Dunkerley - Cross Page 1509</p> <p>1 in the UK, and an individual needed to head that company up, 2 and that was Francisco Martin's cousin. 3 Q. He was the one who lent his name to the fake paperwork to 4 say he ran the fake company, right? 5 A. His name was on the paperwork. 6 Q. Certainly, you did not ever discuss Calvert and its illicit 7 purpose with Mr. Archer, true? 8 A. True. 9 Q. You can take that down, please, Mr. Jackson. 10 Yesterday we talked a little bit about the \$15 million 11 that Rosemont Seneca Bohai LLC used to purchase the second bond 12 issuance. Do you recall that? 13 A. Yes, I do. 14 Q. And we had said that originally at the time -- which was 15 about September/October 2014 -- Jason Galanis had told you that 16 Mr. Archer had Chinese investors and this was their money 17 because it needed to be placed before an investment contract 18 expired, true? 19 A. True. 20 Q. And you believed him at the time, correct? 21 A. Absolutely. 22 Q. And one of the reasons you believed him was because you 23 knew that Mr. Archer in fact had connections to Chinese private 24 equity firms, true? 25 A. True.</p>	<p>I667GAL1 Dunkerley - Cross Page 1511</p> <p>1 same fellow who is sitting over there in the corner, Mr. 2 Archer, correct? 3 A. Mr. Archer, yes. 4 Q. You hadn't met him though before you met in this 5 courthouse, correct? 6 A. Correct. 7 Q. Thank you. 8 Are everyone else's screens working? 9 THE COURT: So a couple people's screens are not 10 working. Can you look over the folks in front of you? Thank 11 you. We will work on that over the break. Thanks. 12 Q. Mr. Jackson, could I just ask you to go back to the first 13 page so everyone can see it, and just blow up the bottom e-mail 14 that we were looking at. 15 Now, we also talked about in the context of that \$15 16 million that was used to purchase the second bond issuance the 17 fact that you had withdrawn \$15 million from the Wealth 18 Assurance Private Client account, and you had deposited it in 19 the Thorsdale Fiduciary Guaranty -- Thorsdale Fiduciary &amp; 20 Guaranty account, right? 21 A. Yes. 22 Q. And you later learned after you were arrested that that was 23 the money that was used to buy the second bond issuance, 24 correct? 25 A. Yes.</p>