

1 I think, or you know, by mail?
 2 THE WITNESS: Yes.
 3 (b)(7)(C) Not courier, but mail?
 4 THE WITNESS: I don't know -- you know, I don't
 5 know the way that it came.
 6 (b)(7)(C): It came from Cincinnati?
 7 THE WITNESS: It came from Cincinnati.
 8 (b)(7)(C) Okay. And once you got it, you
 9 would just route it over to (b)(7)(C)
 10 THE WITNESS: Correct.
 11 (b)(7)(C) Who would get the necessary
 12 documents.
 13 THE WITNESS: Correct.
 14 BY (b)(7)(C)
 15 Q And when you had your secretary send it, did you
 16 instruct her on how to send it? Was it to be sent by fax, by
 17 Federal Express, by regular mail? How was it sent out?
 18 A I don't recall I gave her instructions, but I think
 19 it was done by fax.
 20 Q Do you know who received it?
 21 A (b)(7)(C)
 22 department in Cincinnati.
 23 Q Do you know what her position is?
 24 A No.
 25 Q Are you aware of any other procedures to check that

1 that at the end are payments that, you know, are
 2 questionable. We are funding their activities, or we are
 3 protecting ourselves. It's questionable.
 4 Q The only payments that you reported on the FCPA
 5 form, like Exhibit Number 8, were those that were recorded in
 6 a sensitive payment account for logistics?
 7 A Correct.
 8 Q Are you aware of any other payments to government
 9 officials or employees that were not recorded on the
 10 sensitive payment accounts?
 11 A No, not at all.
 12 Q I want to turn now to the general category of the
 13 general manager's sensitive payments. We've gone through the
 14 ones on the logistics side. Was there anything -- let me
 15 strike that.
 16 With respect to the authorization, the 1016, and
 17 the issuance of the check, I'm assuming that that process
 18 would have been the same regardless of whether it was a
 19 guerrilla payment or a payment to the government.
 20 A Correct. Correct.
 21 Q With respect to reporting the payments in the books
 22 and records, is there anything, any other report that would
 23 have encompassed the payments to the guerrillas? We talked
 24 about the FCPA as the one report that captured the ones that
 25 were to the government.

1 the payments being reflected in here were being accurately
 2 reflected? When I say here, I mean on the report?
 3 A No. No. Probably there is one. It's again,
 4 speculation. You recall that I said that when I sent the
 5 general manager summaries the first time to Cincinnati, there
 6 were inconsistencies, correct?
 7 Q Right.
 8 A And they said, "But the number is different than
 9 the one that we have." With that theory, there was another
 10 copy or summary sent to Cincinnati that I wasn't aware of.
 11 Okay? And the only person who had those details, that I know
 12 had those details and was reconciling all the expenses was
 13 (b)(7)(C)
 14 Therefore, my speculation is, in addition to what
 15 they were sending, there was somebody else who was sending
 16 information. To whom, I don't know. But in order for them
 17 to say that my number doesn't agree with somebody else's, it
 18 means that there was another report.
 19 Q Those summaries were for all the sensitive
 20 payments, correct?
 21 A Yes.
 22 Q Not just the FCPA?
 23 A No. We never had any special treatment. For me,
 24 sensitive payments were all the same, okay, were payments
 25 that, you know, are questionable, payments to the guerrillas.

1 A Okay.
 2 Q Are there any other reports?
 3 A There is one report. Okay. This request that came
 4 from internal audit to detail the general manager's expense
 5 that I mentioned (b)(7)(C) collected information and the
 6 information had a lot of discrepancies.
 7 What I gave instructions was now, rather than just
 8 sending this summary, summary detailing the payments, we are
 9 going to attach to a summary the 1016s.
 10 Therefore what I asked was every month (b)(7)(C)
 11 (b)(7)(C) is supposed to do the printout of the two sensitive
 12 accounts, logistics and operations, and behind the printout,
 13 he should have all the 1016s, and put it in a book.
 14 Rather than just fill in the form, that Cincinnati
 15 was saying, I went a step ahead. That's why all the
 16 different sensitive payments from 1993 all the way to 1996,
 17 sometimes 1996, were photocopied and documented in those
 18 books.
 19 Q When you say books, can you describe what you mean?
 20 A Yes. Due to the, you know, number of payments down
 21 through the years, we just put in a -- we put in a, with
 22 rings, we just paste -- how do you say -- in different little
 23 books.
 24 (b)(7)(C) Threc-ring binders?
 25 THE WITNESS: No, we don't have threc-ring binders.



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