

Exhibit 1

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IN THE UNITED STATES DISTRICT COURT

FOR THE

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
vs.)	CRIMINAL ACTION NO.
)	17-10198-FDS
SCOTT J. WOLAS,)	
Defendant.)	

THE ORAL DEPOSITION OF SCOTT J. WOLAS,
held pursuant to Notice, and the applicable provisions of
the Federal Rules of Civil Procedure, before
Jeffrey Mocanu, a Court Reporter and Notary Public, within
and for the Commonwealth of Massachusetts, at the offices of
the United States Attorney, 1 Courthouse Way, Suite 9200,
Boston, Massachusetts, on Friday, February 15, 2019, at
scheduled for 10:09 a.m.

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1 APPEARANCES:

2 On behalf of the United States:

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9 For the Defendant:

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13 Boston, MA 02210
14 (617) 223-8061

15 For Ms. Sturge:

16 WILLIAM W. FICK, ESQ.
17 Fick & Marx, LLP
18 24 Milk Street
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21 Also Present:

22 Evelyn Georgiadis, USAO Data Analyst
23
24
25

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1 P R O C E E D I N G S

2 (10:09 a.m.)

3 S C O T T J. W O L A S, having been sworn by a Notary
4 Public to tell the truth, the whole truth and nothing
5 but the truth, testified upon his oath as follows:

6 EXAMINATION BY MS. HEAD:

7 Q Good morning, Mr.Wolas. I'm Carol Head; I'm an
8 Assistant U.S. Attorney here.

9 A Good morning.

10 Q Have you ever been deposed before?

11 A No.

12 MR. FICK: I'm assuming we're operating under the
13 usual civil deposition rules where all objections are
14 reserved except as to the form of the question.

15 And the other thing I would just say on behalf of
16 Ms.Sturge is that she did not object to proceeding with
17 this deposition because we understand the logistical
18 constraints and the Government's right -- separate right
19 under the Plea Agreement to do this deposition. However,
20 since we have not yet received a response of pleading in the
21 forfeiture matter, and since we have not had the opportunity
22 to do any document discovery, we would reserve the right to
23 object to the use of this deposition in the forfeiture
24 proceeding and/or to seek additional testimony from
25 Mr.Wolas should that become necessary. Thank you.

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1 MS. PEACHY: I guess I should also make clear
2 while we're on the subject that Mr.Wolas is retaining any
3 Fifth Amendment rights that he might have as to the
4 uncharged conduct or charges pending in other states.

5 BY MS. HEAD:

6 Q So, you've never been deposed before.

7 A No.

8 Q Have you been to a deposition?

9 A Yes, I have.

10 Q So, you understand you have to give oral
11 responses.

12 A Yes.

13 Q And for the record to be clear we don't talk over
14 each other. I will wait for you to finish an answer and you
15 will wait for me to finish a question before responding.

16 A Absolutely.

17 Q Is there any reason why you can't testify
18 truthfully today?

19 A No.

20 Q And do you understand you're here pursuant to a
21 deposition subpoena?

22 A I do.

23 (Wolas Deposition Exhibit No. 1
24 marked.)

25 BY MS. HEAD:

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1 Q I'm showing you what I've marked as Exhibit 1
2 which is a deposition subpoena. Have you seen this before?

3 A Yes, I have.

4 Q And this was dated for a Monday but we had to
5 reschedule until today.

6 A Understood.

7 Q You understand that you're under oath and required
8 to testify truthfully here today?

9 A I do.

10 (Wolas Deposition Exhibit No. 2
11 marked.)

12 MS. HEAD: And I'm putting in front of the witness
13 Exhibit 2 which is the plea agreement.

14 BY MS. HEAD:

15 Q Are you familiar with this document?

16 A Yes, I am.

17 Q What is it?

18 A It is a written plea agreement in the matter of
19 UnitedStates v. Scott J. Wolas, and I signed this agreement
20 on June 12th, 2018, and it consists of 12 pages.

21 Q And when you signed it did you understand the
22 agreement?

23 A Yes, I did.

24 Q I want to direct your attention to Page 9, and
25 there -- on the fourth full paragraph it states -- are you

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1 with me, "Defendant further"?

2 A I am.

3 Q "Defendant further agrees to be deposed with
4 respect to defendant's assets at the request of the U.S.
5 Attorney." Did I read that correctly?

6 A Yes, you did.

7 Q So you understand that we're here today pursuant
8 to that provision in your plea agreement?

9 A Yes.

10 Q Do you also understand as part of the plea
11 agreement you agree to forfeit \$1,787,813?

12 A I do.

13 Q And are you aware that since you signed this plea
14 agreement that the forfeiture amount has changed?

15 A I do believe that I am aware of that.

16 (Wolas Deposition Exhibit No. 3
17 marked.)

18 BY MS. HEAD:

19 Q And what is marked as Exhibit 3 is an Order of
20 Forfeiture.

21 A Yes, it is.

22 Q And if you turn your attention to Page 2, at the
23 last "whereas" on the page, "Further the defendant has
24 assented to the entry of an amended forfeiture money
25 judgment in the amount of \$1,949,813 in UnitedStates

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1 currency on the grounds that such amount constitutes or is
2 derived from proceeds obtained from the offenses as a result
3 of his guilty plea." Did I read that correctly?

4 A Yes, you did.

5 Q And do you understand that the forfeiture amount
6 is now in excess of 1.9 million?

7 A I do.

8 Q And turning back to the plea agreement, you
9 understand that pursuant to this order the UnitedStates has
10 the right to forfeit substitute assets up to the amount of
11 the money judgment?

12 A I do.

13 Q And in the plea agreement you consented to -- if
14 you turn back to Page 9 -- at the bottom of the page the
15 paragraph starting "without limiting" ---

16 A M-hm.

17 Q In the plea agreement you have consented to the
18 forfeiture of your interest in a specific asset, a
19 retirement account held by Hunton Andrews Kurtz LLB.

20 A I do.

21 Q And that is Hunton Williams, the law firm Hunton
22 Williams?

23 A I think that's a successor firm. I don't know
24 that for a fact but I ---

25 Q And if you go to the very bottom of the page, you

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1 also understand that you agreed to assist fully in the
2 forfeiture of your interest in the foregoing asset?

3 A Yes, I did.

4 Q And I just want to turn to the next page right
5 before Paragraph Section 10 starts, the last sentence,
6 "Defendant further agrees," under that paragraph?

7 A M-hm.

8 Q You further agreed not to assist any third party
9 in asserting a claim to the forfeited assets in an ancillary
10 proceeding and to testify truthfully in any such proceeding
11 including by deposition. Do you see that?

12 A Yes, I do.

13 Q And do you understand that this plea agreement has
14 some consequences for you?

15 A I presume so.

16 Q Yes. Well, if you'd turn to the bottom of that
17 page ---

18 A Yes.

19 Q So, am I correct that you worked at the law firm
20 of Hunton Williams in New York?

21 A That is correct.

22 Q And while you were there you contributed to
23 retirement?

24 A Yes.

25 Q And at some point -- and your wife, then wife, was

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1 a beneficiary of that account?

2 A She was the primary beneficiary as I recall.

3 Q And at some point after you fled or after you left
4 New York State your former wife filed for divorce; is that
5 correct?

6 A I believe that is correct.

7 Q In 2001?

8 A Yes.

9 Q And in 2017 Cecily Sturge filed a Notice in
10 Petition to Modify Final Judgment in the Dissolution of
11 Marriage?

12 A Yes.

13 (Wolas Deposition Exhibit No. 4
14 marked.)

15 MS. HEAD: Take a moment to review this.

16 (The witness reviewed the document.)

17 BY MS. HEAD:

18 Q Do you recognize what I've marked as Exhibit 4?

19 A I believe so.

20 Q Do you know what it is?

21 A Well, it's another Notice in Petition to Modify
22 Final Judgment in the Dissolution of Marriage to Incorporate
23 a QDRO.

24 Q And did you draft these pleadings?

25 A I do believe I did, yes.

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1 Q Okay.

2 A Yes.

3 Q And I just want to -- there is a couple of
4 documents together in that so there is -- the first one is
5 entitled "The Notice."

6 A Yes.

7 Q First page. And then if you turn to -- there's a
8 Bates number on the bottom.

9 A Yes.

10 Q See that? Okay. So if you turn two pages in to
11 the document ending in Bates number 750 ---

12 A Yes.

13 Q --- there's a Petition to Modify?

14 A Yes.

15 Q Did you draft the petition?

16 A Yes, I did.

17 Q And then if you go a little bit further in with a
18 Bates number marked 754 there is an affidavit?

19 A Yes.

20 Q Did you draw up the affidavit?

21 A Yes, I did.

22 Q And then if you go to 764 there is a QDRO or
23 Qualified Domestic Relations Order, did you prepare that?

24 A Preliminary proposed QDRO, yes, I did.

25 Q So did you file these documents in the court?

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1 A I may have.

2 Q Was Ms.Sturge with you when you filed them?

3 A I don't recall.

4 Q So I want to turn to the affidavit which is at
5 757. So Paragraph 10 at the bottom.

6 A Yes.

7 Q And you drafted this document?

8 A Yes, I did.

9 Q So you write, "My former spouse has," turn the
10 page, "concealed himself so process cannot be properly
11 served upon him. This concealment has continued from 2001
12 through and including the present." Did I read that
13 correctly?

14 A Yes, you did.

15 Q So when you drafted that was that true?

16 A As a technical matter I would say that it was
17 true.

18 Q If you go further down in that paragraph it says,
19 "His whereabouts are unknown." And you drafted that,
20 correct?

21 A Yes, I did.

22 Q And that isn't true.

23 A At the time that I drafted this -- and you're
24 referring to his whereabouts right now? At the time I
25 drafted it his whereabouts were unknown. That was not true.

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1 Q So you were in contact with your wife at the time
2 you drafted this? Your ex-wife, I'm sorry.

3 A I had contacted her and she had asked me to assist
4 in transferring the retirement account to her.

5 Q And you did that by preparing ---

6 A Yes, I did.

7 Q --- the pleadings.

8 A Yes.

9 Q And you were in regular phone contact with her.

10 A When you say "regular" I'm not sure what you mean,
11 but I was in telephone contact with her.

12 Q You exchanged telephone calls?

13 A Yes, we did.

14 Q Text messages.

15 A I don't know about text but certainly telephone.

16 Q You met in person?

17 A Perhaps a couple of times.

18 Q And what time -- so this was filed -- you can tell
19 by the date stamp from the court -- I believe the court put
20 that there.

21 A Yes.

22 Q February 8th?

23 A Yes.

24 Q So in February you were in telephone contact with
25 her.

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1 A Yes, I would have contacted her by telephone.
2 Q What about in January?
3 A Of what year?
4 Q 2017.
5 A No, I don't think so. Let me think. Perhaps.
6 Q What about in December 2016?
7 A I think I did telephone her in December.
8 Q November 2016?
9 A I actually don't recall. May have.
10 Q Now, the affidavit -- if you turn to the -- I
11 don't know if you're still on the page that we were on --
12 758, and if you turn to 759.
13 A Yes.
14 Q You see it's notarized?
15 A Yes.
16 Q Do you know who notarized it?
17 A I think it is a -- it says Annette Williams.
18 Q Did you accompany Ms. Sturge when she had ---
19 A I believe I did.
20 Q Do you recall where the Notary notarization
21 happened?
22 A I do not.
23 Q Do you recall the date of the notarization?
24 A Well, it says February -- doesn't it say February?
25 Q Oh.

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1 A What does it say. February 3rd is what the
2 document says, so if in fact the Notary affixed her stamp
3 that would be the date.

4 Q So it's February 1st.

5 A February 3rd.

6 (Wolas Deposition Exhibit No. 5
7 marked.)

8 BY MS. HEAD:

9 Q This is Exhibit 5. This is a photograph bearing a
10 date stamp February 8, 2017. Do you recognize yourself in
11 that photo?

12 A To be honest I don't but I'm not going to contest
13 it.

14 Q And do you recognize the other person?

15 A It appears to be Cecily.

16 Q The man in the photograph is carrying some papers.
17 Do you see that?

18 A Looks like it's a folder, yes.

19 Q Do you know if those are the same papers?

20 A I do not.

21 Q Do you recognize where that is?

22 A I do not.

23 Q Do you recall where you might have been with
24 Cecily on February 8, 2017?

25 MR. FICK: Is this the 8th?

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1 A I do not.

2 BY MS. HEAD:

3 Q Okay. Is that possibly the -- I mean, I don't
4 want you to speculate, but I believe the location is at the
5 bank.

6 A You make that representation. I have no reason to
7 doubt it.

8 (Wolas Deposition Exhibit No. 6
9 marked.)

10 BY MS. HEAD:

11 Q I've marked as Exhibit 6 a Supplemental Affidavit
12 of Cecily Sturge. Do you recognize that document?

13 A I do.

14 Q And what is it?

15 A Supplemental Affidavit.

16 Q Of Cecily Sturge.

17 A Yes.

18 Q And it bears a date of March 30th, 2017, correct?
19 Well, at least the filing date. I'm sorry. The filing
20 date.

21 A Well, it does say, "Sworn, subscribed before me
22 this 30th day of March" and does have a filing date of March
23 30th, 2017.

24 Q Did you draft this?

25 A Yes, I did.

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1 Q I want to focus on -- here are the Bates numbers
2 again -- the Bates number ended 782, the top of the page.
3 Actually, no, turn back to the -- why don't you read the
4 whole Paragraph 13 to yourself.

5 A Okay.

6 Q So you again wrote that your whereabouts are
7 unknown.

8 A Yes, I did.

9 Q And that wasn't true.

10 A That's -- my statement was not true.

11 Q Were you in contact with Ms.Sturge in March of
12 2017?

13 A I believe that I was.

14 Q By text, by phone, in person?

15 A I would say by phone and perhaps once in person.
16 I don't recall specifically.

17 Q And you were arrested on April 7th, 2017?

18 A Yes, I was.

19 Q Did you have any other contact with Ms.Sturge, by
20 phone, perhaps in person, before you were arrested?

21 A I know that I delivered the documents to her. I
22 don't believe that she was aware of any of the contents. I
23 drafted them, I said file them, this will transfer the asset
24 to you. I was quite surprised it had not been transferred
25 to her in 2001.

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1 Q In November of 2016 you began renting a room in
2 Delray Beach, Florida; is that correct?

3 A Yes, that's correct.

4 Q And you were using Ms.Sturge's Air B&B account?

5 A I believe that I was.

6 Q And Ms.Sturge paid for that room?

7 A Actually she did not. I think that she booked it,
8 or I booked it using her credit card, but I paid cash for
9 the room. I don't think that there was actually a charge
10 placed on her account.

11 Q But you don't know that for a fact.

12 A I do not know that for a fact.

13 Q What about other contact in 2016, how was that --
14 with Ms.Sturge?

15 A Other than what I've just testified to I don't
16 know of any as I sit here right now.

17 Q Do you have any contact through social media?

18 A No. None.

19 Q Or WhatsApp applications?

20 A No. Neither one.

21 Q So it would have been ---

22 A Telephone.

23 Q And in person?

24 A As I say, there were a few occasions where I did
25 meet with her in person.

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1 Q In 2016.

2 A In 2016, no, I don't think. Only 2017, yes, per
3 the date of these documents. In 2016? I may have met with
4 her once.

5 Q Do you recall when?

6 A No, I do not. It would have been after I arrived
7 in Florida.

8 Q And when did you arrive in Florida?

9 A I think I arrived in Florida sometime in late
10 September. I can't be sure.

11 Q Did you have any contact with her, with Cecily
12 Sturge, in 2015?

13 A No. Not that I recall, no.

14 Q When did you leave New York?

15 A I left New York in 1997.

16 Q Between the time you left New York and 2017 did
17 you have contact with Ms.Sturge?

18 A I may have spoken to her once.

19 Q What about your son?

20 A I spoke to him sporadically.

21 Q Any particular time frame?

22 A No. Did I speak to him ten times, no. Could I
23 have spoken to him three times, perhaps.

24 Q Any recollection of what year?

25 A I think the last time -- I actually saw him once,

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1 I do believe, in 2013. I do think that's correct. From
2 2013 until I saw him in jail I did not see him. In jail of
3 April 2017.

4 Q Thank you for the clarification. Did you speak
5 with him between 2013 and 2017?

6 A No, I don't believe that I did.

7 Q So when you said you had sporadic contact that
8 would have been before 2013?

9 A Well, I know that I saw him, as I sit here, in
10 2013. Is it possible I may have spoken to him between 2013
11 and 2017? It's possible, but there were not -- there was
12 not a lot of contact.

13 Q And just to clarify, I believe you have two sons?

14 A Yes.

15 Q And the son we're referring to is Tyler?

16 A Yes.

17 (Wolas Deposition Exhibit No. 7
18 marked.)

19 BY MS. HEAD:

20 Q Do you recognize this document?

21 A Yes, I do.

22 Q And you prepared this?

23 A No, I did not prepare this.

24 Q Who prepared it?

25 A I believe my son Tyler prepared this.

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1 Q And what is Exhibit 7?

2 A It's an affidavit. It's my affidavit, sworn to
3 April 14th, 2017.

4 Q And in Paragraph 12 you relinquish all your rights
5 to the retirement plan.

6 A Yes, I do.

7 Q And you had been arrested at the time?

8 A Yes. I was incarcerated at the time of this
9 affidavit.

10 Q And so you understood that by transferring your
11 retirement account to Ms.Sturge that meant that it wouldn't
12 be available to compensate any of your victims.

13 MR. FICK: Objection.

14 A I don't believe that that was in my mind when I
15 signed this, but I don't believe that this affidavit
16 transferred the account to her. I don't object to a
17 transfer. The account was transferred to her by operation
18 of law in 2001. Operation of the Florida equitable
19 distribution laws.

20 BY MS. HEAD:

21 Q But by signing this affidavit you were supporting
22 transfer of assets that you had to Ms.Sturge?

23 A I'll say that I did not object to it.

24 Q And those assets were not going to be available to
25 compensate your victims?

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1 A Well, I don't think the assets were available to
2 compensate any victim as of this date, but the assets would
3 not be available to compensate any victim.

4 Q Did you and Ms.Sturge ever discuss sharing the
5 proceeds of the retirement account?

6 A No. Fat chance.

7 Q Was there any agreement to relinquish your rights
8 in the retirement account to compensate Ms.Sturge for
9 helping you out?

10 A No. She didn't really help me out.

11 Q Was it your -- well, she -- you charged some Ubers
12 to her.

13 A She was not aware of that, and to my shame I do
14 that without her permission.

15 Q Who's idea was it to transfer your entire
16 retirement account proceeds to her?

17 A Well, when I was in Florida she asked me to assist
18 her. I would think that she intended by that request to
19 mean all of the assets because she thought she was entitled
20 to them. So I would have to say that I think it was her
21 idea, but it was one that I thought that she was entitled
22 to. I'd given up my interest in this money a long time ago,
23 in my mind.

24 Q Because you couldn't access it.

25 A No, not because I couldn't access it. Because I

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1 thought that it had already been transferred to her in 2001.

2 Q Did you ever inquire about whether it had been
3 transferred to her in 2001?

4 A I had no contact with the plan administrator from
5 1995 to the date, to the time that we're sitting here right
6 now.

7 Q I'm going to return to back in time when you lived
8 in New York.

9 A Okay.

10 Q I believe you had some bank accounts when you
11 lived in New York.

12 A I'm sure that I did.

13 Q Do you recall having a bank account at New York
14 National Bank?

15 A I do not.

16 Q So you don't know if there were any assets left in
17 this account?

18 A I do not.

19 Q Do you recall ever having a bank account at
20 Citibank?

21 A I do recall that.

22 Q Were there any assets remaining in that account?

23 A No.

24 Q Did you trans --

25 A Excuse me. Go back to the name of the first bank.

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1 Give it to me again.

2 Q New York National Bank.

3 A I may have.

4 Q Do you know if you moved any money out of that
5 bank account ---

6 A No.

7 Q --- overseas perhaps?

8 A No.

9 Q What happened to the money?

10 A It was dissipated.

11 Q How?

12 A Paying people I owed money to. Personal expenses.

13 Primarily paying the people I owed money to.

14 Q And Citibank, you remember that.

15 A Yes.

16 Q Did you move any assets from that account
17 overseas?

18 A No.

19 Q What happened to the money?

20 A Same thing.

21 Q Do you remember ---

22 A Let me amend that answer. When you say did I move
23 assets say from either account overseas, I had a business at
24 the time in St. Martins and it is conceivable that money may
25 have been transferred from either of those accounts to the

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1 corporate account in St. Martins, which would have been in
2 the name of Crystal Waters.

3 Q And that was the name of the business?

4 A Yes.

5 Q Crystal Waters.

6 A Yes.

7 Q Can you spell that?

8 A C-r-y-s-t-a-l, Waters, W-a-t-e-r-s.

9 Q And what happened to that business?

10 A I believe that it just dissolved or went bust.

11 Q Do you have any idea if there's any assets left in
12 St. Martins?

13 A I do not believe there are any. None to my
14 knowledge.

15 Q Have you made any inquiries?

16 A No.

17 Q And at what time -- what time period approximately
18 was this business operational in St. Martin's?

19 A Probably from about 1990 to 1995 but don't hold me
20 to the dates.

21 Q And what was the purpose of the business?

22 A It was a liquor distribution business. It had
23 exclusive licenses to distribute a number of major brands on
24 St. Martin's, Antiguilla, Curacao and one other.

25 Q Did that company -- you were the sole owner of the

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1 company?

2 A Yes, I was.

3 Q Did it have any real estate?

4 A No.

5 Q And do you recall any accounts in its name? You
6 said there were -- you transferred money into that account.
7 Do you recall where that account was located?

8 A I believe it was at ABN Amoreau. And it would
9 have been at ABN Amoreau on the other Dutch islands as well.
10 On Anguilla, I don't know if we had an account on Anguilla
11 or not. Anguilla was British.

12 Q I don't know Caribbean affiliations but there are
13 many different countries. So, thank you for clarifying
14 that. Do you recall having a bank account at Chemical Bank?

15 A I may have.

16 Q Any recollection of ---

17 A No.

18 Q Any -- besides St. Martin's, any other foreign
19 jurisdictions that you might have transferred assets to?

20 A No.

21 Q Any other bank accounts that you used that you can
22 remember in the '90s?

23 A No. There may have been a brokerage account.

24 Q Where?

25 A When you say "bank account" I'm taking a generic

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1 view on. I think that I may have had a brokerage account --
2 I think it was at Merrill.

3 Q Do you know what happened to that?

4 A I think that when I left New York there were no
5 assets in the account.

6 Q Any real estate?

7 A I had real estate.

8 Q And I'm talking about the New York period.

9 A Yes. I owned a home in Westchester County.

10 Q What happened to that?

11 A I believe that went into foreclosure.

12 Q You mentioned the St. Martin's business, Crystal
13 Waters. Any other business interests?

14 A No.

15 Q Any trusts?

16 A No.

17 Q Life insurance?

18 A There was a family trust that was distributed and
19 I don't remember the years. It was administered by the
20 World Bank of Canada and I assisted in the distribution of
21 the trust to members of my family.

22 Q How much -- do you recall how much money you
23 received out of that?

24 A I do not.

25 Q And what happened to that?

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1 A The trust was wound up. It owned real estate. It
2 came as a surprise, a letter out of the blue, and I had a
3 relative named Harry Seddon who when he passed away had no
4 siblings and his parents had left the estate to the issue of
5 his mother's and brother's -- his mother's and brother's
6 children per stirpes and as a result of that there was a
7 distribution, this letter came from the World Bank of
8 Canada. And I participated, my Aunt Francis participated.
9 My brother participated and I believe my cousins in
10 Vancouver participated.

11 Q And what year was this, do you recall?

12 A I would have to say it was in the '90s. I'm
13 pretty sure it was in the '90s.

14 Q And your share from that estate?

15 A I received it. It's gone.

16 Q When you were married to Ms.Sturge did you share
17 a home with another woman?

18 A I rented an apartment that I lived in with another
19 woman.

20 Q So you didn't own it.

21 A No.

22 Q What name did you use for this woman?

23 A I used my real name.

24 Q Did you transfer any assets to her?

25 A No.

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1 Q What was her name?

2 A [REDACTED].

3 Q Now let's move to Massachusetts. You used the
4 name [REDACTED]?

5 A Yes, I did.

6 Q And what years was that generally between?

7 A 2008 to 2017.

8 Q 2008?

9 A 2007 to 2017.

10 Q Any other times that you've used that name?

11 A No.

12 Q And you worked when you had that name?

13 A Yes, I did.

14 Q And you were under salary and commission bonus?

15 A Commission, no salary.

16 Q How much was the salary?

17 A Well, it wasn't a salary.

18 Q Oh. I'm sorry. Commission or salary, yes.

19 A My total commission I know from the documents from
20 Century 21 was a little over 1.2 million over the total time
21 period that I was employed. The bulk of that would have
22 occurred in the last three years.

23 Q And you had a bank account at Santander?

24 A Yes, I did.

25 Q And that was in the name of Increasing Fortune?

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1 A That is correct.

2 Q Did you have any bank accounts in [REDACTED] -- under
3 the name [REDACTED]?

4 A I did. I had one at Brookline Bank.

5 Q Brookline Bank. Oh, is it in here?

6 A Yes. At the St. Mary's branch.

7 Q You made a number of purchases of collectibles.

8 A Yes.

9 Q And what were those collectibles that you
10 purchased?

11 A I purchased soldiers, some coins and stamps.

12 Q Wine?

13 A On occasion, yes.

14 Q Books?

15 A Yes.

16 Q And where are those items now?

17 A The wine is in me. And others. The books I
18 donated to libraries. I don't know where the soldiers are
19 or the coins are.

20 Q And stamps, did you say?

21 A I got some stamps.

22 Q And what's the approximate dollar value of what
23 you purchased?

24 A You know, I just -- I -- I don't recall the
25 values.

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1 Q And where was your last known location?

2 A I guess the last known location I saw was at

3 [REDACTED].

4 Q And when was that?

5 A That would have been in September of 2016. I have
6 trouble with dates because in that time frame I was drinking
7 very heavily.

8 MS. HEAD: I wouldn't mind taking a break and
9 having a look at this. Maybe getting some copies made.

10 (Recess from 10:58 a.m. to 11:08 a.m.)

11 BY MS. HEAD:

12 Q We were talking about the Santander Bank?

13 A Yes.

14 Q And you made a number of international wire
15 transfers out of that account. Do you recall that?

16 A Not specifically.

17 (Wolas Deposition Exhibit No. 8
18 marked.)

19 BY MS. HEAD:

20 Q I'm going to represent to you that this is a
21 summary of transfers out of the Santander account and I'd
22 like to ask you a couple questions ---

23 A Sure.

24 Q --- about it. On the first one it has under the
25 description ---

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1 A Yes.

2 Q --- I don't even know how to say that. [REDACTED]

3 [REDACTED], do you recognize that person or entity?

4 A No. The only entity I recognize is the second
5 one.

6 Q And what is that?

7 A I bought stamps.

8 Q And that ---

9 A That is a -- probably the most well known
10 international stamp company in the world.

11 Q But you don't know ---

12 A It's an auction house.

13 Q You don't recognize the name?

14 A I don't recognize these other names, and I've done
15 my best to recall what these wires might have been 'cause I
16 do not recognize the names that they went to.

17 Q If you look at the date does that help at all?

18 A Let me see. Where was the first wire sent? This
19 one to Abdel ---

20 Q This is the information that I have.

21 A Okay. I do believe there was a wire that I sent
22 to Algeria because someone in Quincy, an Arab in Quincy whom
23 I knew and I can't recall his name, had a family in Algeria
24 that needed money for an operation and they gave me -- and
25 they could not wire to Algeria. I don't know why. And they

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1 gave me the money and I wired the money. I do believe that
2 that -- if this is the one that relates to Algeria -- that
3 that was the reason for that wire.

4 Q So, there's that one and then there's the stamp
5 business?

6 A Yes.

7 Q And then there is a cluster of ones in the summer
8 of 2016.

9 A I do know that in the summer of 2016 I borrowed
10 money from an Arab in Quincy and I know at least on two
11 occasions, perhaps more, these wires go to Morocco 'cause he
12 was Moroccan, that I am repaying him wired money to people
13 that he designated me to wire the money to.

14 Q And who is this person?

15 A His first name was [REDACTED]. I believe his last name
16 was [REDACTED] but please don't hold me to that. I'm not good
17 with their names. And these aren't names that -- these are
18 all Romanizations of their names anyhow.

19 Q Did you have any expectations of getting any of
20 this money back?

21 A No. It was not my money. When I say it was not
22 my money, it was -- this was not my money. The other money
23 was money that was loaned to me that I was repaying at the
24 direction of Kamal.

25 Q You also made some transfers to the -- there's a

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1 real [REDACTED].

2 A Yes.

3 Q And you made some transfers to him out of that
4 account.

5 A Every month. Or I shouldn't say -- also perhaps
6 out of Brookline Bank. I don't -- either Brookline Bank or
7 Sovereign or Santander. Every month I sent him a Social
8 Security deposit.

9 Q Was it his entire Social Security?

10 A I believe it was less, less the cost of sending
11 the wire.

12 Q And why were you sending him his Social Security?

13 A Because it was his Social Security. I'd without
14 his knowledge taken his identity and at a point in time I
15 had gotten a notice from the Social Security Administration,
16 I guess he was entitled to payment, so I arranged it for
17 him. I called up, I said I was from Social Security, give
18 me his address, and I arranged for the wires to get to him.

19 Q So you called him?

20 A Yes.

21 Q So he didn't know...

22 A No.

23 Q Okay. But you wired it from this account.

24 A Yes. Every month. What would happen, Social
25 Security would wire it to the bank and I would in turn wire

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1 it to his account.

2 Q And you never had any conversations with the real
3 [REDACTED] about his Social Security benefits?

4 A Other than that one conversation, no.

5 Q And how do you know [REDACTED] ?

6 A He was a friend of my ex-wife Cecily.

7 Q So you mentioned the Santander Bank and the
8 Brookline Bank.

9 MS. HEAD: This would be a good time to mark the
10 financials. So this is nine?

11 THE COURT REPORTER: Yes.

12 MS. HEAD: You want to take a moment and review
13 this?

14 THE WITNESS: Okay.

15 (Wolas Deposition Exhibit No. 9
16 marked.)

17 BY MS. HEAD:

18 Q So I've put in front of you Exhibit 9 which is a
19 document entitled "The United States Department of Justice,
20 Financial Statement." Do you recognize this?

21 A Yes, I do.

22 Q And what is this?

23 A This is a financial statement that was prepared by
24 me with the assistance of counsel and which I executed
25 today.

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1 Q And you just reviewed it again. Do you have any
2 changes to this?

3 A Well, I guess the only change I would make, seeing
4 these wires, I guess these came out of the -- if you're
5 going to consider that a transfer. I don't think I included
6 those on -- the transfer from Santander.

7 Q So you have a first page, two other names used,
8 you list some initials?

9 A Yes.

10 Q The first one is [REDACTED]?

11 A Yes.

12 Q "D.P." is ---

13 A [REDACTED].

14 Q --- [REDACTED]. "F.A." is ---

15 A [REDACTED]

16 Q "E.A." is ---

17 A [REDACTED].

18 Q "C.S." is ---

19 A Cameron Sturge.

20 Q And then you spell out [REDACTED]. Any others
21 that ---

22 A No.

23 Q And this is -- is this limited in time period at
24 all, your answer here for these?

25 A No limit on the time period.

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1 Q So you mentioned the Social Security numbers.

2 Let's turn -- if you turn to Page 3 ---

3 A Yes.

4 Q So Question 9?

5 A Yes.

6 Q And this is for a checking account ---

7 A Yes.

8 Q --- for the past six years.

9 A Yes.

10 Q So you had Santander and Brookline which we've
11 already discussed, and then a TD Bank account.

12 A Yes. Santander would also include Sovereign which
13 was the predecessor bank.

14 Q Any others?

15 A No.

16 Q And any other -- did you use any of the names
17 besides [REDACTED] during -- in the six-year time
18 period?

19 A No. Well, I mean, I used for a brief period of
20 time Endicott Asquith and Cameron Sturge after I left
21 Massachusetts.

22 Q Did you open any bank accounts in their name?

23 A No.

24 Q And Question 10, a savings account? No savings
25 account.

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1 A No.

2 Q Including in any of the other names.

3 A No.

4 Q And then you have -- Question 11 is credit cards.

5 A Yes.

6 Q And you list one credit card.

7 A Yes.

8 Q And that's inclusive of the past six years?

9 A Yes.

10 Q And then retirement accounts?

11 A Yes.

12 Q And you have the Hunton Williams.

13 A Yes.

14 Q And nothing, no other retirement bank accounts?

15 A No.

16 Q Security deposits is No. 13.

17 A No.

18 Q You have none?

19 A Correct.

20 Q And No. 14 is cash over twenty-five hundred

21 dollars?

22 A None.

23 Q And there's no cash hidden anywhere?

24 A No.

25 Q Buried somewhere?

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1 A No.

2 Q Safety deposit boxes?

3 A I had a safety deposit box briefly at TD Bank.
4 There was never anything in the deposit box and I canceled
5 it, I canceled the account and the box at the same time.

6 Q Why did you open it?

7 A I fell for the sales pitch about what a great bank
8 they were. They weren't such a great bank.

9 Q Money market or brokerage accounts, Page ---

10 A No. None.

11 Q What about -- going back further than six years

12 ---

13 A M-hm.

14 Q You mentioned the Merrill Lynch account earlier?

15 A Yes.

16 Q Anything ---

17 A No.

18 Q --- else?

19 A No.

20 Q Foreign bank, brokerage or other accounts?

21 A No.

22 Q And that's for the six years is now, but going
23 back further than that?

24 A Yes, there would be the account that I mentioned
25 in Crystal Waters name, St. Martin.

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1 Q Any others?

2 A No.

3 Q Question 18 is certificates of deposit and/or
4 Treasury notes?

5 A None.

6 Q And going back ---

7 A No.

8 Q --- six years -- you've got to let me finish my
9 question for the record.

10 A I'm sorry. I apologize.

11 Q It's going to read terribly.

12 A I apologize.

13 Q So if we go back beyond the six-year time period
14 are there any other certificates of deposit or Treasury
15 notes?

16 A No.

17 Q Question 19, travelers checks? You listed you
18 have none; is that correct?

19 A That is correct.

20 Q In any other names did you have any?

21 A No.

22 Q Question 20 is all securities, and you listed none
23 in the past six years.

24 A Correct.

25 Q Did you have any prior to the six years, the past

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1 six years?

2 A If you include what was held in the retirement
3 account, and I don't know what the holdings were, but
4 presumably they held four different types of securities, but
5 that would be beyond six years.

6 Q And the Merrill Lynch account?

7 A Yes. There would have been securities in that
8 account.

9 Q Any other accounts that you can recall?

10 A No. If I may amend, I'm almost positive it was
11 Merrill Lynch but could it have been Smith Barney? It might
12 have been.

13 Q Turning to Page 8, No. 21 asks you to list all
14 tax-exempt funds and/or municipal bonds in which you have an
15 interest. You listed none in the last six years?

16 A Correct.

17 Q Going back further than six years are there any?

18 A No.

19 Q Question 22 asks you to list all equity securities
20 and/or commodity contracts in which you have had an
21 interest, ever had an interest, and you listed none in the
22 past six years.

23 A Correct.

24 Q If you go back further than six years did you have
25 any such interests?

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1 A In the brokerage account I had I'm sure that there
2 were derivative contracts in that account.

3 Q Anything else?

4 A No.

5 Q Question 23 asks for all mutual funds in which you
6 ever had an interest in the past six years. You listed
7 none?

8 A Correct.

9 Q Any other accounts within the last six years or
10 beyond?

11 A No, not mutual funds.

12 Q No. 24 asks about brokerage accounts or margin
13 accounts in the last six years. You listed none.

14 A Correct.

15 Q Are there any others in the past six years or
16 beyond that time period?

17 A None other than what I mentioned.

18 Q No. 25 is accounts, loans and/or other notes
19 receivables within the past six years and you listed none;
20 is that correct?

21 A That is correct.

22 Q And any additions to this or accounts, loans and
23 other notes receivable beyond the six-year period?

24 A No.

25 Q Question 26, any annuity contracts in the past six

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1 years, you listed none; is that correct?

2 A That is correct.

3 Q Any others in the past six years or beyond?

4 A No.

5 Q No. 27 is promissory notes or loans to any person
6 and you listed none in the last -- oh, that's not limited by
7 six years. Do you have any additions to that?

8 A No, I do not.

9 Q No. 28, list all business interests within the
10 past six years and you listed "Increasing Fortune, Inc."?

11 A That is correct.

12 Q Any others?

13 A No.

14 Q Any others more than six years ago?

15 A There would be Crystal Waters.

16 Q Anything else?

17 A No.

18 Q Did you have an ownership interest in the real
19 estate company that you worked at?

20 A No, I did not.

21 Q You said that you have no life insurance policy,
22 correct?

23 A That is correct.

24 Q And No. 31 is real estate ownership interest and
25 you said you had none.

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1 A Correct.

2 Q There was no additions to that?

3 A No.

4 Q No. 33 asks about income protection insurance, you
5 said you had none.

6 A That is correct.

7 Q No. 34 asks for transfers of property that you
8 have made within the last six years. Did you have any
9 additions to that?

10 A No, I do not.

11 Q Not the retirement fund?

12 A I'm sorry. You would include the retirement fund?
13 Yes.

14 Q Anything else?

15 A No.

16 Q And if you could just flip through the last few
17 pages and tell me if you have any additions or subtractions
18 to this.

19 A I do not.

20 Q So when you worked as Eugene Grathwohl did you --
21 you didn't contribute to any retirement fund when you were
22 using that name?

23 A I did not.

24 Q Okay. And I think you've mentioned this
25 gentleman's name but you can correct me if I'm confusing him

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1 with somebody else -- who is [REDACTED],
2 [REDACTED]?

3 A I think that, referring to that list -- I don't
4 know whether -- is he on the list?

5 MS. HEAD: Let me mark this as Exhibit 10.
6 (Wolas Deposition Exhibit No. 10
7 marked.)

8 THE WITNESS: And your question is?

9 BY MS. HEAD:

10 Q So I'll tell you that Exhibit 10 is extracted from
11 your bank statements from the Sovereign/Santander Bank
12 relating to transactions involving the name [REDACTED], which
13 I'm sure I'm pronouncing wrong, [REDACTED], and I
14 just wanted to ask you if you -- who that person was if you
15 remember?

16 A That's a person that loaned money to me.

17 Q And who is -- it's a "he"?

18 A It's a "he." When I say it's a "he" that I was
19 put in contact with, I was placed in contact with him by
20 [REDACTED], and at points in time when I needed cash he
21 would loan me money at a fairly steep rate of interest and
22 then when I could I would repay him.

23 Q And where is he located?

24 A I believe he was in Quincy.

25 Q So he loaned you money, what time period was this?

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1 A Well, it says here 2014 to 2015.

2 Q And if you recall how much money he loaned you?

3 A I do not.

4 Q And so where you see a withdrawal from your
5 account ---

6 A Yes.

7 Q --- it's your position that these are repayments
8 on a loan?

9 A That is correct. Not a single loan but there were
10 multiple loans.

11 Q And what was the purpose of the loans?

12 A The original ones were to cover -- we had problems
13 finishing up 19 The Strand. I fired the contractor. On a
14 very short term basis, a matter of three or four months, I
15 had to redo a lot of work that had been done improperly and
16 he provided the short-term backing.

17 Q Did you ever make any transfers to [REDACTED]
18 [REDACTED] for repayment of loans that you remember?

19 A No. If your question is does he hold any of that
20 money from me, the answer is no.

21 Q And you didn't give him money for any other
22 reason.

23 A No. Part of this was the payment of principal and
24 part of it was interest.

25 Q Do you understand where that money went?

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1 A I do not. Beyond it going to him, no.

2 Q Do you know if any money was being sent to
3 Morocco?

4 A By him? I have no idea. I have no idea of any
5 money being sent to Morocco by anybody other than the wire
6 transfers that you saw, you showed me, and I really don't
7 recall those.

8 Q Between 2006 and 2016 did you travel to Florida at
9 all?

10 A Yes, I was in Florida in September of 2016.

11 Q Besides that trip?

12 A I may have. I don't recall. If I did, I did not
13 see Cecily or my son.

14 Q You mentioned, we discussed earlier that you used
15 a number of different names.

16 A Yes.

17 Q Can I go through some of those names and ask you
18 some questions about whether you have any assets under these
19 names. So am I correct that you used the name [REDACTED]
20 [REDACTED] for a time?

21 A Oh goodness. The answer to that question is yes.
22 That's a long time ago.

23 Q And I don't believe he was included on your
24 financial statement.

25 A No, he was not. I used -- when I first left New

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1 York I used his name for a brief period of time.

2 Q And when was that?

3 A That would have been in 1997.

4 Q And did you work when you used his name?

5 A Yes, I did.

6 Q And where was that?

7 A I worked for Biltmore Securities.

8 Q And that was in 1997?

9 A Correct.

10 Q And was there a real [REDACTED] ?

11 A Yes. [REDACTED].

12 Q [REDACTED]. I'm sorry.

13 A Yes.

14 Q And who was that person?

15 A He was my best friend.

16 Q And so you were employed and used the name [REDACTED]

17 [REDACTED]. Did you earn a salary?

18 A I earned commission.

19 Q Did you open any bank accounts in that name?

20 A No.

21 Q Any brokerage accounts or mutual funds?

22 A No.

23 Q Using the name [REDACTED] did you
24 contribute to any retirement accounts?

25 A No.

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1 Q Using the name [REDACTED] did you
2 purchase any securities?

3 A No.

4 Q Any bonds?

5 A No.

6 Q Using the name [REDACTED] did you
7 purchase any real estate?

8 A No.

9 Q Using the name [REDACTED] did you
10 purchase any life insurance?

11 A No.

12 Q Using the name [REDACTED] did you
13 open any safety deposit boxes?

14 A No.

15 Q Did you establish any trust, partnership or
16 business interest?

17 A No.

18 Q Did you move any assets overseas?

19 A No.

20 Q And did you use the name after 1997?

21 A I don't believe I did. He's now deceased.

22 Q And the money, the salary, or, I'm sorry, the
23 commissions that you earned from Biltmore Securities, what
24 happened to that?

25 A I just -- I lived on it.

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1 Q And you were in Florida then?

2 A Yes.

3 Q You also used the name [REDACTED] ?

4 A Yes.

5 Q What was the time period for using that name?

6 A Probably after I was in Florida, probably after I
7 used -- I stopped using [REDACTED]'s name.

8 Q So the time period?

9 A 1997 through 2000, 2001.

10 Q And did you work using that name?

11 A Yes, I did.

12 Q And where did you work?

13 A I worked for Chatfield Dean.

14 Q And what was that?

15 A It was a brokerage account, brokerage house.

16 Q You were on salary or commission?

17 A Commission.

18 Q Did you open any bank accounts using [REDACTED]

19 [REDACTED]'s name?

20 A No.

21 Q Now I'm going to run through this list with

22 [REDACTED]'s name.

23 A Sure.

24 Q Contribute to any retirement accounts?

25 A No.

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1 Q Purchase any securities or bonds?

2 A No.

3 Q Purchase any real estate ---

4 A No.

5 Q --- using that name? You didn't purchase any real
6 estate.

7 A No.

8 Q Did you buy any life insurance using Allen Hengst?

9 A No.

10 Q Open any safety deposit boxes?

11 A No.

12 Q Establish any trusts, partnerships or business
13 entities using [REDACTED]?

14 A No.

15 Q Move any assets overseas?

16 A No.

17 Q I want to ask you about when you were using the
18 name [REDACTED] did you know a woman named [REDACTED]

19 [REDACTED]?

20 A Yes, I did.

21 Q Did you purchase a house with her?

22 A Yes, I did.

23 Q And was that held in the name of [REDACTED] or

24 ---

25 A I don't think it was. I think it was held in a

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1 different name.

2 Q Do you recall what name that was?

3 A I do not.

4 Q Did you create a trust in the name of [REDACTED]

5 [REDACTED]?

6 A No, I did not.

7 Q So you had no -- you bought a house with [REDACTED]

8 ---

9 A Yes.

10 Q --- [REDACTED].

11 A She sold the house.

12 Q Did you have an ownership interest in the house?

13 A I believe I did.

14 Q What happened to that ownership interest?

15 A You know, I don't know. I should say I don't

16 recall. I don't have it today.

17 Q You mentioned the name [REDACTED]?

18 A Yes.

19 Q And you used that name for a time?

20 A Yes.

21 Q What was the time period you used that name?

22 A Two thousand and -- this is a guess -- 2003

23 through 2009.

24 Q And where did you use that name?

25 A I used it here in Massachusetts.

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1 Q Were you employed using that name?

2 A No. Well, I was employed but not on the [REDACTED]

3 [REDACTED]

4 Q You were employed using what name?

5 A [REDACTED].

6 Q So for what purposes did you use the name [REDACTED]

7 [REDACTED]?

8 A Just personal.

9 Q So keeping in mind the [REDACTED] name did you
10 open any bank accounts using that name?

11 A No.

12 Q Any brokerage accounts or mutual funds using that
13 name?

14 A No.

15 Q Contribute to any retirement accounts using that
16 name?

17 A No.

18 Q Purchase any securities or bonds?

19 A No.

20 Q Purchase any real estate under the name [REDACTED]

21 [REDACTED]?

22 A No.

23 Q Purchase any life insurance policies?

24 A No.

25 Q Any safety deposit boxes using the name [REDACTED]

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1 Prescott?

2 A No.

3 Q Establish any trust, partnership or business
4 interest?

5 A No.

6 Q Any other assets under [REDACTED] name?

7 A No.

8 Q Move any assets overseas?

9 A No.

10 Q Now [REDACTED], is that how you say it?

11 A Yes.

12 Q You used that name for a time?

13 A Yes.

14 Q And what was that time period?

15 A Probably 2003 through roughly 2007.

16 Q And did you work?

17 A Yes.

18 Q And where did you work?

19 A I worked as a bartender.

20 Q Where?

21 A Oh, a lot of different places.

22 Q What state?

23 A Massachusetts.

24 Q And what area?

25 A Taunton, Raynham, Stoughton, maybe Boston for a

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1 certain period of time, yeah, Boston.

2 Q Same series of questions about assets.

3 A Sure.

4 Q Using the name [REDACTED] -- [REDACTED]?

5 A [REDACTED].

6 Q Did you open any bank accounts in that name?

7 A No.

8 Q Did you open any brokerage accounts or mutual
9 funds in that name?

10 A No.

11 Q Did you contribute to any retirement accounts in
12 that name?

13 A No.

14 Q Did you purchase any securities or bonds in that
15 name?

16 A No.

17 Q Did you purchase any real estate using that name?

18 A No.

19 Q Did you have any life insurance under that name?

20 A No.

21 Q Open any safety deposit boxes?

22 A No.

23 Q Establish any trust, partnerships or business
24 interests in that name?

25 A No.

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1 Q Move any assets overseas?

2 A No.

3 Q Any other assets in that name?

4 A No.

5 Q Did you have any assets at any time in that name?

6 A No.

7 Q So the next name I'll ask you about is [REDACTED]

8 [REDACTED] ?

9 A Yes.

10 Q You used that name for a time?

11 A Yes.

12 Q And when did you use that name?

13 A From September of 2016 until April of 2017.

14 Q And why did you use that name?

15 A A fictitious name I made up.

16 Q And where in the country did you use that name?

17 A I used that name in Massachusetts and then in

18 Florida.

19 Q Were you employed under that name?

20 A No.

21 Q I would like to ask you again a series of

22 questions about accounts. Using the name [REDACTED]

23 [REDACTED] did you open any bank accounts in that name?

24 A No.

25 Q Did you have any brokerage accounts or mutual

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1 funds?
2 A No.
3 Q Contribute to any retirement plans?
4 A No.
5 Q Purchase any securities?
6 A No.
7 Q Purchase any real estate?
8 A I did not.
9 Q Did you own any real estate?
10 A No.
11 Q Have any life insurance in that name?
12 A No.
13 Q Any safety deposit boxes in that name?
14 A No.
15 Q Establish any trusts, partnerships or business
16 interests in that name?
17 A No.
18 Q Move any assets overseas in that name?
19 A No.
20 Q Any other assets held in that name?
21 A No.
22 Q And then you used the name Cameron Sturge at one
23 time, and when was that?
24 A That was in 2017 in Florida.
25 Q And did you have -- were you employed under the

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1 name Cameron Sturge?

2 A No.

3 Q How did you support yourself when you were in
4 Florida in 2017?

5 A I brought some money with me from Massachusetts.

6 Q About how much money?

7 A This is a very rough guess. I would say about
8 \$20,000.

9 Q And where is that money now?

10 A It's spent.

11 Q Did you withdraw it from one of your bank accounts
12 before you left?

13 A I may have taken some from Santander. There
14 wasn't much left in Santander, but I had some cash.

15 Q Where was that cash kept?

16 A At my house.

17 Q So you didn't work as Cameron Sturge. I'm asking
18 the same account questions using the name Cameron Sturge.
19 Did you open any bank accounts?

20 A No.

21 Q Any brokerage accounts or mutual funds?

22 A No.

23 Q Did you contribute to any retirement plans?

24 A No.

25 Q Did you purchase any securities or hold any bonds?

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1 A No.

2 Q Did you purchase or have any real estate?

3 A No.

4 Q Did you have any life insurance under the name
5 Cameron Sturge?

6 A No.

7 Q Did you have any safety deposit boxes under the
8 name Cameron Sturge?

9 A No.

10 Q Did you establish any trust, partnerships or
11 business interests using the name Cameron Sturge?

12 A No.

13 Q Any other assets?

14 A No.

15 Q And you didn't move any assets overseas.

16 A No.

17 Q So other than the names we have discussed, any
18 other identities that you've used?

19 A No. Will you deem the affidavit amended to
20 include [REDACTED]?

21 Q I think the record will indicate that you've added
22 that. Are there any financial accounts in the United States
23 that you control?

24 A None.

25 Q Are there any financial accounts overseas that you

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1 control?

2 A None.

3 Q Is anyone holding money or property for you right
4 now?

5 A No one.

6 Q Do you have any real estate anywhere in the world?

7 A I do not.

8 Q Do you have any personal property of a value more
9 than \$500 anywhere in the world?

10 A I do not.

11 MS. HEAD: I don't have any further questions.

12 THE WITNESS: To amend my last answer I would say
13 directly or indirectly to all those.

14 MR. FICK: I have no questions.

15 MS. HEAD: All right. Thank you.

16 MS. PEACHY: Thank you.

17 THE WITNESS: Thank you.

18 (Whereupon, the deposition was concluded at 11:46
19 a.m.)

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