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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

BENJAMIN SERYANI AKA)
BENJAMIN SEMAAN SERYANI, an)
individual; and SYNERGY)
SELECT ONE, LLC, an Indiana) CASE NO. CIVDS1925212
Limited Liability)
Corporation doing business)
in California,)
) PAGES 1 THROUGH 42
Plaintiff,)
)
vs.)
)
THE HOLY SEE AKA VATICAN)
CITY STATE (HS/VCS) AKA)
VATICAN NATION; ET AL,)
)
Defendants.)
_____)

REPORTER'S TRANSCRIPT OF ORAL PROCEEDINGS
BEFORE HON. DONALD R. ALVAREZ, JUDGE
DEPARTMENT S-23
SAN BERNARDINO, CALIFORNIA
OCTOBER 27, 2022

APPEARANCES:

FOR THE PLAINTIFF: ROBERT J. SPITZ LAW OFFICE
BY: ROBERT SPITZ, ESQ.
FOR THE LPJ: FULLERTON, LEMANN, SCHAEFER & DOMINICK
BY: DAVID COLELLA, ESQ.
FOR THE ROMAN CATHOLIC ARCHBISHOP OF LA: CLARK & TREVITHICK
BY: MICHELE B. FRIEND, ESQ.
REPORTED BY: REBECCA M. ALLEN
Official Court Reporter
CSR No. 13689

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1 SAN BERNARDINO, CALIFORNIA; THURSDAY, OCTOBER 27, 2022

2 A.M. SESSION

3 DEPARTMENT S-23

HON. DONALD R. ALVAREZ, JUDGE

4 APPEARANCES:

5 The Plaintiff, represented by ROBERT SPITZ,
6 Attorney at Law; the Defendants, represented by
7 DAVID COLELLA, Attorney at Law; MICHELE FRIEND,
8 Attorney at Law.

9 (Rebecca M. Allen, Official Court Reporter, CSR No. 13689.)

10 --000--

11 THE COURT: Ready to go ahead?

12 MR. COLELLA: Yes, we are, your Honor.

13 THE COURT: Mr. Spitz, you ready?

14 MR. SPITZ: Yes. I just wanted to make one slight
15 comment. Mr. Colella initially indicated he wouldn't have any
16 witnesses or documents. Last night I got documents that have
17 been previously submitted to this Court. I'm not going to raise
18 any big objection. I think the Court was lenient for me, and I
19 am not going to oppose any of that. The only request I would
20 make is that I have given a copy of the power of attorney that
21 was referenced in my client's previous testimony that I
22 neglected to include in the binder that the Court has. It's
23 already in the file in several places previously. I just wanted
24 to give that to the Court for Exhibit 12 in my binder. It was
25 something that Mr. Seryani referred to in a couple of occasions,
26 and he may refer to it again today, and I just wanted to have

1 that for the Judge's reference. I am not going to raise any
2 objection to the cross-examination today.

3 THE COURT: Okay.

4 MR. COLELLA: We're ready to proceed, your Honor.

5 THE COURT: Want to go ahead? Want to retake the stand?
6 He's already been sworn.

7 MR. COLELLA: May I proceed?

8 THE COURT: Go ahead.

9 MR. COLELLA: Thank you, your Honor.

10 **BENJAMIN SERyani,**
11 **resumes the stand, having been previously duly sworn, was**
12 **examined and testified further as follows:**

13 **CROSS-EXAMINATION**

14 BY MR. COLELLA:

15 Q Good morning, Mr. Seryani.

16 A Good morning. Good morning, everybody.

17 Q I will be asking you a few questions today. I will try not
18 to go back over too much of what we already did last week, but
19 there will be a few items I do need to get some clarifications
20 on. Okay?

21 A Please.

22 Q You are a Jordanian citizen?

23 A American citizen. I carry the Jordanian passport. I lived
24 very limited time there, yes.

25 Q You live -- I didn't catch the last thing you said?

26 A During my 50 years, 57 years old age, I lived there short

1 period of time in Jordan. Yes, my dad is Jordanian. My mother
2 is Jordanian. I carry Jordanian passport. It expires 25 years
3 ago and I am American citizen, living in California since
4 20 years.

5 Q Okay. And do you maintain Jordanian citizenship?

6 A I cannot get rid of it.

7 Q Okay. Because you were born in Jordan, correct?

8 A Because I'm born in Jordan.

9 Q Okay.

10 MR. SPITZ: Your Honor, if I may. The court reporter
11 seems to be doing a good job taking down Mr. Seryani's
12 testimony. But she should -- I would like to advise her she
13 should interrupt if she's missing any words because he's got
14 quite a thick accent that I can't even understand half of the
15 time.

16 THE COURT: Our reporter is fantastic and if she has any
17 questions, she will let everybody know.

18 Q BY MR. COLELLA: So Mr. Seryani, you have mentioned that
19 during the time period of the project you did live in Jordan?

20 A Live in Jordan -- I didn't live in Jordan as live in Jordan.
21 I traveled to Jordan, and I stayed periodically in Jordan to
22 confirm these -- to go on to perform what I needed to perform
23 based on the contracts that I have.

24 Q Okay. In front of you, Mr. Seryani, there is a group of
25 documents that on the cover identifies a supplemental opening
26 brief to motion -- do you see that?

1 A Yes.

2 Q Okay. Can you turn to Exhibit 15? It's approximately
3 halfway through the binder.

4 THE COURT: The one I have here?

5 MR. COLELLA: Yes, your Honor. There is a copy for you
6 as well.

7 THE COURT: Exhibit 15?

8 MR. COLELLA: Exhibit 15.

9 THE COURT: Okay.

10 THE WITNESS: Please.

11 Q BY MR. COLELLA: Let me know when you have that in front of
12 you.

13 A I have.

14 Q Okay. Let me first go to -- see if this is on.

15 THE COURT ATTENDANT: Let's get that auto tune going.
16 We'll get that cleared up for you.

17 Q BY MR. COLELLA: You see that, Mr. Seryani?

18 A Yes.

19 Q Okay. Is that your signature?

20 A That's my signature.

21 Q Okay. And this document is identified on the front page as
22 your affidavit, correct?

23 A Yes.

24 Q Okay. What I'm looking at specifically is number two. This
25 is your testimony that states, I was a resident of the Kingdom of
26 Jordan during the time of September 1, 2012, through 18 of

1 November 2015?

2 A Exactly.

3 Q Do you see that?

4 Do you see that?

5 A Yes.

6 Q Was that true?

7 A It's part of the whole affidavit. It's true and it's part
8 of the whole affidavit that states, number one, I'm a residence
9 of California, and authorized representative of Synergy Select
10 One, LLC, and have personal knowledge of that.

11 So, yes, I travel to Jordan. I use my American passport.
12 When I travel there I reside in Jordan. But I never had any
13 residency as in sense of documentation. I never had any legal
14 document as a residency.

15 I didn't have even a driver's license in Jordan. So I
16 didn't have any documentation. But, yes, I travel, I resided
17 there for a short period of time on a visa. When I enter I pay
18 the visa, and if I pass that visa limit which is two weeks on the
19 way out, I pay penalty.

20 Q So this declaration that refers to you as being a resident
21 of the Kingdom of Jordan from September of 2012 through
22 mid-November 2015, that is incorrect? Or that is correct?

23 A It is correct to what I stated. Periodically, I travel.
24 That's the period of time I travel to Jordan.

25 Q And you maintained during this period of -- under this
26 contract a Jordanian bank account; isn't that correct?

1 A I maintained a Jordanian bank account. Yes, that's correct.

2 Q And actually you maintained two Jordanian bank accounts,
3 correct?

4 A That you claim as part of his --

5 MR. COLELLA: Move to strike as non-responsive. It's a
6 yes or no question.

7 THE WITNESS: What is it, please?

8 Q BY MR. COLELLA: You maintained two bank accounts in Jordan
9 during the time period under which you were performing the
10 contracts, correct?

11 A Yes.

12 Q Okay. And Synergy also maintained two bank accounts in
13 Jordan during the time period, correct?

14 A They are the same two bank accounts.

15 Q Okay. Now a little background on your family. You have a
16 brother, correct?

17 A So?

18 Q You have a brother whose name is Majdi Siryani; is that
19 right?

20 A Correct.

21 Q And I believe you submitted his declaration in support of
22 your opposition to this motion, correct?

23 A He submitted his declaration, yes.

24 Q Do you know if it was prepared by your attorney?

25 A I think so.

26 Q Okay. And your brother Majdi Siryani is a priest within the

1 Latin Patriarchate of Jerusalem, correct?

2 A He's the president of the appellate court with LPJ.

3 Q Okay. And your spouse, her name is Faten?

4 A Faten.

5 Q Is it with an "n"?

6 A "N." F-a-t-e-n.

7 Q Okay. Thank you. And she provided a declaration in support
8 of your opposition as well, correct?

9 A Correct.

10 Q Now, I believe that declaration was submitted under the name
11 Faten Massarweh?

12 A Massarweh-Seryani, yes.

13 Q Okay. And then you have a son named Daniel?

14 A My son, Daniel.

15 Q Okay. I know you have other children, but Daniel was
16 involved in some of the projects, correct?

17 A No. Daniel, during a time when we needed to restore the
18 company by total coincidence, he was in Jordan. I was in
19 California. So I called an attorney in Jordan and I requested
20 him to adjust the company, so we will be legally conforming in
21 Jordan. So he will just put the company under his name.

22 Q Okay.

23 A But he was not in any way, form, or shape involved in the
24 operation.

25 Q Okay. And Synergy, that corporation or that LLC was formed
26 in 2012, correct?

1 A July 27th, if I am not mistaken, 2012.

2 Q And that's a -- is it Indiana?

3 A It is Indiana.

4 Q Okay.

5 A Then it was reformed in California September 2013.

6 Q Okay. And in California it was registered as a foreign LLC,
7 correct?

8 A I think so.

9 Q Okay.

10 A I don't have it in front of me, but I think so.

11 Q So I'm just going to walk through a few of these with you
12 relatively quickly. Exhibit 16 in that packet in front of you,
13 Mr. Seryani --

14 THE COURT: Now, is that exhibit an exhibit that's in
15 the opening brief?

16 MR. COLELLA: That's correct. The cover sheet of what
17 you have there, your Honor, is the packet of documents that that
18 exhibit is from.

19 THE COURT: Okay.

20 MR. COLELLA: So this is Exhibit 16 to the supplemental
21 opening brief.

22 THE COURT: Gotcha.

23 Q BY MR. COLELLA: You have that in front of you, Mr. Seryani?

24 A Yes, please.

25 Q Okay. What I see here is the certificate of organization
26 state of Indiana. And it's affective July 23, 2012, correct?

1 A Correct.

2 Q Okay. And I see here it's identified as registered agent.
3 That is your name, located in Plymouth, Indiana?

4 A Yes.

5 Q Okay. And then Exhibit 17, I believe this is what you're
6 referring to, the application to register a foreign LLC in
7 California?

8 A Yes.

9 Q Okay. And I see -- is this your wife's name down here,
10 "Faten"?

11 A Yes, sir.

12 Q Okay. And then at some point Synergy was dissolved,
13 correct?

14 A Yes.

15 Q Okay. And can you recall when Synergy was resolved,
16 Mr. Seryani?

17 A I don't have it front of me, but probably end of 2014 or
18 early 2015, something like that. I don't have anything in front
19 of me.

20 Q Sure. Flip to the next exhibit, Mr. Seryani.

21 A Yes.

22 Q This is number 18. This is the certificate of cancellation
23 of LLC filed December 17, 2014. And that is also signed by
24 Faten, correct?

25 A Yes.

26 Q And then shortly thereafter, Synergy was dissolved as an LLC

1 in Indiana, correct?

2 A Yes.

3 Q Okay. And this is the next in order, Number 19, Certificate
4 of Dissolution of Synergy in Indiana, dated December 19, 2014.
5 Do you see that?

6 A Yes.

7 Q As of December 14th -- I'm sorry, December 19, 2014, Synergy
8 was no longer conducting business; is that right?

9 A Yes.

10 Q Okay. So I guess one of my questions, Mr. Seryani, is if
11 Synergy was no longer conducting business, were you still engaged
12 in business in Jordan under these contracts?

13 A There was a few things here when they start bleaching the
14 contracts, they start sometime July 2014. So the contracts that
15 you refer to is a service contracts that you mentioned them
16 somewhere here that they were expired that time or around that
17 time.

18 Q Okay. Because what I had recalled was up through middle of
19 November of 2015 your declaration in New Hampshire said you were
20 still a resident of Jordan. So I guess I was trying to determine
21 were there still performance ongoing in Jordan between that
22 dissolution time in December of 2014 and mid-November of 2015
23 where your declaration said you were still a declaration of
24 Jordan. Were your still in Jordan working for AUM or LPJ?

25 A I was traveling back and forth because we still -- we just
26 started by that time the issues start merging up. If you want to

1 refer to the services, the services in depth, then there was a
2 group of contracts for a very short -- I think few months in
3 February 2015 performed by the Jordanian company which still
4 exists.

5 Q And at some point you reached a settlement with AUM
6 regarding one of those contracts or some of the services; is that
7 right?

8 A It doesn't relate to this case at all.

9 Q But you have entered into a settlement with AUM regarding
10 some services even if they are not part of this, correct?
11 Services related to the project related to the project in Jordan,
12 correct?

13 A Related to the other company in Jordan. Not related to this
14 case in any way.

15 Q The other company is the other company -- I don't want to
16 mispronounce it, Altwawemia?

17 A Altwawemia.

18 Q You -- we will have to spell it for the record. Can you
19 spell -- can you spell that for me.

20 A A-l-t-a-w-e-m-i-a. I would say something like that.

21 Q Okay. Can I refer to that as "AT," just for shorthand.
22 That might make it easier as we go through this.

23 So your answer is there was a settlement agreement, but
24 it dealt with AT's performance of some services at AUM; is that
25 right?

26 A We used to do settlements regularly every now and then. And

1 since of how much payment you received, where is that, that's
2 related either to third party audits. And regularly we did
3 something like that.

4 Q Okay. And at some point under one of the contracts that's
5 at issue, you initiated arbitration, correct? In Jordan?

6 A That's totally for something else. That's for the fleet
7 services for the buses contract.

8 Q Okay. But so that's a yes? You did initiate arbitration,
9 it was on a different contract?

10 A Yes. I filed a request. I did not initiate it.

11 Q Okay. And do you know that whether or not that arbitration
12 is still pending in Jordan?

13 A It cannot happen because I cannot go to Jordan.

14 Q Okay. And you retained counsel in that matter, correct?

15 A I lost counsel a long time ago.

16 Q Okay. But you had an attorney in that matter?

17 A With that, that time, yes, of course. I requested somebody
18 to file at request for that arbitration.

19 Q Last week we were talking about you were testifying as to
20 what sounded like an interest in refinancing some debt for the
21 AUM project. Do you recall that?

22 A Specify it, please.

23 Q Sure. Do you recall talking about Mr. Charles Swinney?

24 A Yes.

25 Q Okay. And there was some exhibits that referenced the best
26 phone number to reach you at. And there were numbers referenced

1 a plus 926. Are those Jordanian phone numbers?

2 A I had three phone numbers, three lines on me. I have the
3 American line, I have a Italian line, and I have Jordanian line.
4 When I travel I use all of them, depends where I am.

5 Q Okay. And when I was going through those exhibits and this
6 is in the binder, I believe, from Mr. Spitz, I believe it was
7 Exhibit 20. Let me know when you're there.

8 A I'm on Exhibit 20.

9 Q Okay. I saw Brian Swinney's name. Do you remember
10 Brian Swinney?

11 A Yes.

12 Q Okay. And as I'm looking at Exhibit 20, I am going to --
13 let me see here. 2006. And it identifies a Bermuda address. Is
14 that where Brian Swinney was located?

15 A I never met Brian. I never contacted him.

16 Q Okay.

17 A These e-mails were forwarded to me as you can see it. So I
18 don't know where is Brian located.

19 Q Okay. What I'm looking at page -- Exhibit 20, page one,
20 it's talking about a list of preliminary items needed for loans
21 and number five is a list of real estate that may be available
22 for collateral both in Jordan and in Israel. You see that?

23 A Which exhibit are you talking --

24 Q This is Exhibit 20, page one?

25 A 20?

26 Q That's correct?

1 A Your exhibit --

2 Q Mr. Spitz's exhibit. From the binder.

3 A Okay.

4 MR. SPITZ: Do you have that? I have it here. I don't
5 know if you have it up there.

6 MR. COLELLA: Oh --

7 THE WITNESS: I have this. I don't know if you are
8 referring to this. That's Exhibit 20, where it says
9 Father Michael --

10 MR. COLELLA: So, let's see here. My Exhibit 20 that
11 Mr. Spitz provided to me has in the middle, executive summary is
12 the subject of an e-mail.

13 A That's --

14 Q Same thing?

15 A No.

16 MR. COLELLA: May I approach, your Honor?

17 THE COURT: Go ahead.

18 Q BY MR. COLELLA: Very good. We're all squared away.

19 Mr. Seryani, do you have in front of you Exhibit 20, page
20 one?

21 A Yes, sir.

22 Q I was looking at just number five on this list of items.
23 Talks about list of real estate that may be available both in
24 Jordan and in Israel. Do you see that?

25 A I saw that.

26 Q That's where the LPJ and AUM own property, correct?

1 A Yes.

2 Q Okay. They don't own property in the United States,
3 correct?

4 A I have no idea.

5 Q Okay. You also talked about last week AUM seeking
6 accreditation in the United States. Do you recall that?

7 A Yes.

8 Q And that was in New Hampshire, correct?

9 A Yes.

10 Q AUM never sought nor obtained any accreditation in
11 California, did they?

12 A I don't know about any of accreditation in California or I
13 don't know if they applied or anything like that.

14 Q Okay. Now, I know we talked a little bit about the shipping
15 last week. Everything that was being shipped was going to
16 Jordan, correct? It was all for AUM, was it not?

17 A Yes.

18 Q Okay. When items would come into Jordan, would AT provide
19 the transportation from port to the university? Would the
20 university provide the transportation? How did that work?

21 A That's -- AUM never provide transportation but AUM had
22 trucks that we used based on permission for them if we needed to
23 move stuff. But that's for small little shipment, general
24 speaking containers which we deliver direct to AUM.

25 Q Okay. When you say "we," are you referring to AT or Synergy
26 or some other party?

1 A We all worked in conjunction, together, so I cannot tell you
2 hey, AT did that by themselves or I did that by myself. It's all
3 conjunction, together.

4 Q Okay. Did Synergy maintain an office in Jordan?

5 A No.

6 Q Okay.

7 A We had office at AUM that I used to use when I go there.

8 Q In getting to AT, you had mentioned before that you needed a
9 Jordanian registered company, correct?

10 A Officer.

11 Q Can you just explain briefly to me why that is? Why would
12 you need a Jordanian registered company to perform the services
13 in Jordan, if you know?

14 A I cannot give you the exact answer in sense of when I want
15 to perform the contracts in Jordan I refer to attorneys and I ask
16 them what we needed to do to be legally in Jordan, performing in
17 Jordan. Whatever they suggested I went through.

18 Q Okay. And that led to the creation of AT, correct?

19 A Yes.

20 Q Okay. And in the contracts that are issued here, there is a
21 reference to a subsidiary. Is that subsidiary that's referenced
22 AT?

23 A Yes.

24 Q Okay. So technically as you understood it, you and/or
25 Synergy cannot engage in business in Jordan, correct? Because
26 not registered, not licensed in Jordan; is that right?

1 A Can you repeat?

2 Q Sure. The reason all AT was formed was because Synergy
3 could not engage in business in Jordan under Jordanian law,
4 correct? They were not registered, did not have licenses?

5 A Incorrect.

6 Q Okay. Okay. Please, please explain.

7 A AT was created because if you want to hire employees in
8 Jordan, you have to follow regulation, manage to pay the social
9 security, do their insurances, to pay the taxes and that's why AT
10 was created.

11 Q Okay. Are you an owner or were you an owner of AT?

12 A It was just under my son's name.

13 Q Okay. So would you turn to Exhibit 6 -- actually Exhibit 5
14 first, I apologize. Exhibit 5 in my group of documents, the one
15 that states on the cover the supplement to opening brief.

16 A Five?

17 Q Yes, please. Start with five.

18 A Yes.

19 Q Okay. And Exhibit 5 is a document in Arabic that I cannot
20 read. But would you turn then to Exhibit 6?

21 A Yes.

22 Q Okay. And this is a document from the company's control
23 department in Jordan, correct?

24 A It's for Ministry of Industry and Trade.

25 Q Yes.

26 A Yes.

1 Q Correct. I have it highlighted on the screen. Do you see
2 that very long term that I will not try to read out loud?

3 A The second line?

4 Q That's AT that we're talking about, correct?

5 A Yes.

6 Q And then there is a reference in parentheses, cooperative
7 for logistics services. Do you see that?

8 A Same document?

9 Q Same document. After the AT it says in parentheses,
10 "cooperative for logistics services." Do you see that?

11 A As limited liability company --

12 THE COURT: This is Exhibit 6?

13 MR. COLELLA: This is Exhibit 6, your Honor.

14 THE WITNESS: Are we talking the first line?

15 Q BY MR. COLELLA: No. We are talking in the middle, it says
16 based on the documents archived at the company's control
17 department at the ministry of industry and trade and then the AT
18 company's identified, right, and in parentheses it says
19 "cooperative for logistics service." Do you see that?

20 A Yes.

21 Q That is the same company that is referenced in all the
22 contracts at issue here in this litigation?

23 A Yes.

24 Q And that name in Arabic is also at the top of the document,
25 correct? The top of the contracts?

26 A It depends.

1 Q Okay.

2 A I don't have in front of me to stay yes or no. It depends
3 on -- because on the contract it refers to Synergy Select One,
4 LLC, with all the illustration and it mentions that along with
5 that.

6 Q Okay. And then this identifies that in the second
7 paragraph --

8 A Yes.

9 Q -- I'm kind of skipping ahead here. "Whereas Mr. Daniel
10 Benjamin Semaan Seryani" -- and that's Daniel your son?

11 A Yes.

12 Q "And Mr. Benjamin Semaan Seryani," and that's you, correct
13 Mr. Seryani?

14 A Yes.

15 Q And it has a national identity number. It has -- what is a
16 national identity number?

17 A It's like a social security number. If you are born in
18 Jordan you can automatically get one.

19 Q Okay. And then it goes on to say, "are severally authorized
20 to sign on behalf of the company in all financial,
21 administrative, judicial matters, and any other matters."

22 Do you see that?

23 A Yes.

24 Q Okay. So this is AT, the company that you're a part of that
25 was performing the services in Jordan?

26 A Yes.

1 Q Okay. And then Exhibit 7 just to have the document up there
2 is another document in Arabic. And then I'll go to Exhibit 8
3 which is the translation which I believe is the registration with
4 the Madaba Chambers of Commerce. Do you so that?

5 A Yes.

6 Q I believe this is all you had testified to which is part of
7 the need to hire employees and perform the services that were
8 called upon, correct?

9 A Definitely.

10 Q Okay. And all the staff that was hired by AT, those were
11 all Jordanian citizens as far as you're aware?

12 A Not necessarily.

13 Q Okay. What -- do you know any of the nationalities of
14 people that were hired by AT?

15 A Whatever was available in the market, we hired.

16 Q Okay. To perform all the services in Jordan at least, at
17 AUM's campus?

18 A Yes.

19 Q And then AT also maintained an account in Jordan, correct?

20 A Part of the account you asked me about.

21 Q Okay. So the account that you maintained Synergy maintained
22 and AT maintained, those were -- then there is at least an
23 account --

24 A Yes.

25 Q -- that's common amongst those?

26 A Yes.

1 MR. COLELLA: Thank you. I have no further questions at
2 this time.

3 MS. FRIEND: No questions.

4 THE COURT: Anything?

5 MR. SPITZ: Just a couple.

6 **REDIRECT EXAMINATION**

7 BY MR. SPITZ:

8 Q Does Synergy have the right, even though it's closed, to
9 collect all the debt that it has with LPJ?

10 MR. COLELLA: Objection. Legal conclusion.

11 THE WITNESS: Yes.

12 THE COURT: If you know.

13 Q MR. SPITZ: Have you reached that?

14 A I did research that and in fact, there was a motion by
15 counselor with David about that concept and I research it. And
16 Synergy has the right to collect its assets even if it's
17 dissolved and we were talking about Indiana, not California in
18 specific.

19 MR. COLELLA: Same objection.

20 THE COURT: Well, it's going to be what it is. I am not
21 sure myself.

22 Q MR. SPITZ: We addressed the legal aspects of that in one of
23 our oppositions as well, your Honor. So I believe it's in the
24 part of the motion.

25 Does LPJ, Latin Patriarchate of Jerusalem, maintain
26 parishes in the State of California?

1 A Yes.

2 MR. COLELLA: Objection. Lacks foundation.

3 MS. FRIEND: Join.

4 Q MR. SPITZ: Have you had a discussion with any of the
5 leaders of those parishes in California?

6 A Yes. In fact to a certain point earlier before we get into
7 these contracts my wife and myself we were part of both of those
8 parishes, Pomona and Redlands. We were both members of those
9 parishes.

10 Q And as a board member, what was your understanding of the
11 relationship between those parishes, those two parishes in Pomona
12 and Redlands, the relationship between them and the Latin
13 Patriarchate of Jerusalem?

14 A It's an extension of the Latin Patriarchate parishes.

15 MR. COLELLA: Objection. Lack of foundation.

16 MS. FRIEND: Join.

17 THE COURT: Lay foundation.

18 Q BY MR. SPITZ: Yes.

19 Did you speak with any of the priests who provided those
20 services for those parishes?

21 A Yes.

22 Q Okay. And did those priests -- who did you speak to in
23 particular?

24 A There was several priests who covered the services during
25 years.

26 Q When you were a board member, who was the priest in Pomona?

1 A Was Dr. George El-Far. Father George El-Far.

2 Q Okay. And did you have conversations about him about his --
3 who he was connected to or underneath?

4 A Definitely.

5 Q And what did he tell you?

6 A He's an LPJ priest serving the parish for a certain period
7 of time here in Pomona and Redlands.

8 Q And did he -- what language did he speak?

9 A Arabic.

10 Q And did he give services in Arabic?

11 A Both Arabic, English. But mainly Saturday there was an
12 Arabic mass, yes.

13 Q And did you have any discussions with him about providing
14 financial assistance to the Latin Patriarchate in Jerusalem?

15 A There was always discussion about that. This is one of the
16 sources for the Latin Patriarchate that they extend their
17 services here and they expect that the parish here would extend
18 their hand back and help, yes.

19 MR. COLELLA: Objection. Lack of foundation. Hearsay.
20 Speculation.

21 MS. FRIEND: Join.

22 THE COURT: Sustained.

23 Q MR. SPITZ: What did that priest tell you about the finances
24 supporting the Latin Patriarchate in Jerusalem? What did he tell
25 you?

26 A We had several discussions related to that, related to the

1 order of the Holly See because there is a lot of members of the
2 parish are part of the order, the Western Lieutenancy.

3 THE COURT REPORTER: Western?

4 THE WITNESS: Lieutenancy.

5 MR. SPITZ: Lieutenancy.

6 Go ahead.

7 THE WITNESS: Because there was a lot of members related
8 to the lieutenancy itself, so there was always some sort of
9 support. I want to explain something here. Support not
10 necessary at a certain occasion. There was always exchange for
11 small projects. For example, one of the executives at LPJ would
12 ask if there is possibility to help in a scholarship for a
13 certain priest.

14 And similar small project to fix something in the
15 church, to help in doing several things. So there was a lot of
16 these things going on.

17 Q BY MR. SPITZ: Were these announcements during the services
18 at those parishes?

19 A Definitely. Because that's the only time that parish meets
20 as a whole parish. There was about 625 families. They -- all of
21 them have their bases back in Jerusalem, in Palestine, mainly,
22 let me say that or in Jordan.

23 So those families, they needed all their origin there.
24 So they needed birth certificates, and that's part of LPJ because
25 they have to sign on it. Marriage certificates -- of anything
26 related to their records back in Jordan or Palestine. So you

1 cannot disconnect all those families entirely. They have history
2 and they need to go back to that history.

3 MR. COLELLA: I'm just going to object on the lack of
4 foundation. Hearsay.

5 MS. FRIEND: Join.

6 THE COURT: Go ahead. It is what it is.

7 MR. COLELLA: Understood.

8 THE COURT: Yeah.

9 Q MR. SPITZ: So are you saying, then, that there were
10 requests during the services at the Pomona parish where they were
11 asking the members who had connections to Jordan themselves and
12 Palestine, asking the members please make donations for this
13 project or that project and send money to us to send for these
14 projects in the Holy Land?

15 A Yes. In fact, one in specific I recall and one of the
16 services in Redlands, I attended, me and my wife,
17 Father Rick Vandewater was the priest, LPJ priest. He requested
18 that we needed to collect 50,000 K to send it for in specific
19 AUM. And at the end of the mass, I was standing with him outside
20 and he said we managed to collect the whole amount as per his
21 Beatitude's request.

22 MR. COLELLA: Objection. Hearsay.

23 THE COURT: Sustained.

24 THE WITNESS: And that I think appeared on a
25 declaration.

26 Q MR. SPITZ: And was Father Vandewater the priest assigned by

1 LPJ to the Redlands parish?

2 A Yes.

3 MR. COLELLA: Objection. Lack of foundation.

4 Q MR. SPITZ: And how do you know that?

5 A In fact, during this case process, Los Angeles provided us
6 -- the diocese provided us with a communication between his
7 Beatitude, Pizzaballa and the parish, the diocese of Los Angeles,
8 hiring or request to hire Father Ala Al-Alamat which exists now.
9 He is the priest there. And it states everything. It's one of
10 the exhibits submitted to us by Los Angeles diocese.

11 MR. COLELLA: I will object to the extend it misstates
12 any evidence.

13 MS. FRIEND: Join. Also, I'm not sure it's in the
14 record. The document speaks for itself.

15 THE COURT: Okay.

16 Q MR. SPITZ: Mr. Seryani, I would like to know, though,
17 specifically what statements were made by the priest of the
18 Redlands parish assigned by LPJ, what statements did he make to
19 you that this was his assignment and that's where he is connected
20 to?

21 A The statement --

22 MR. COLELLA: Same lack of foundation, just the line of
23 questioning.

24 THE COURT: Well, the form of the question is what
25 conversations or statements, I guess. Go ahead.

26 Q MR. SPITZ: Yeah. This is for the foundation they've been

1 asking about.

2 So, please tell us what statements he made to you?

3 A Father Rick Vandewater stated that as per the request of his
4 Beatitude that each of LPJ parishes should collect 50 K to
5 support AUM during his visit to California. In fact, the parish
6 in Pomona collected 24-plus thousand as stated in one of the
7 declarations. And the rest of the money was donated by
8 Father Andrew, the owner of Templeton foundation,
9 Queen of Peace Foundation -- Queen of Peace Foundation.

10 Q And again, who told you these facts?

11 A Father Rick Vandewater.

12 Q The --

13 MR. COLELLA: Move to strike.

14 Q MR. SPITZ: The parish priest of the Redlands parish of LPJ
15 at the time?

16 A Yes.

17 MR. COLELLA: Move to strike. Lack of foundation.
18 Hearsay.

19 MS. FRIEND: Join.

20 THE COURT: Seems like it would be hearsay.

21 MR. COLELLA: Yes.

22 MR. SPITZ: Your Honor, if it's -- if he's part of LPJ,
23 it's an admission against interest.

24 THE COURT: All right.

25 MR. COLELLA: You have not established any of that.

26 MR. SPITZ: We just did. That's what we just went

1 through, your Honor.

2 THE COURT: Go ahead.

3 MR. SPITZ: He's testified that the priest himself told
4 Ben that he's part of that. We have provided the documentation
5 of the Latin Patriarchate showing all of its parishes in
6 California. It's one of their website documents that says these
7 parishes -- Pomona, Redlands, and San Francisco -- are part of
8 it. It's one of the documents we submitted early on in the
9 first motion, opposition to the motion to quash.

10 MR. COLELLA: It misstates --

11 MR. SPITZ: Both documents are in the court file.

12 MR. COLELLA: It misstates evidence. Misstates the
13 documents.

14 MR. SPITZ: It doesn't --

15 MR. COLELLA: And the declarations -- I didn't interrupt
16 you, but you are interrupting me.

17 THE COURT: Okay. Go ahead and proceed.

18 MR. COLELLA: I was going to finish that both the
19 archdiocese of Los Angeles and the diocese of San Bernardino
20 have both submitted declarations and documentations supporting
21 the absence of any LPJ parishes or assets within the respected
22 diocese which would cover Pomona and San Bernardino and
23 Redlands.

24 THE COURT: And so we have conflicting evidence as being
25 presented on that.

26 MR. COLELLA: I suppose conflicting when there is --

1 okay.

2 THE COURT: I kind of expected that. Okay.

3 MS. FRIEND: Misunderstanding might be a better --

4 MR. COLELLA: You're right.

5 Q MR. SPITZ: Just the other thing, in what -- where were the
6 offices of Synergy One business offices located during the time
7 period that services were being provided to LPJ?

8 A California. Always been California.

9 MR. SPITZ: I have no further questions, your Honor.
10 Oh, other than -- of this witness -- other than if you would
11 turn to Exhibit 12 in our binder, not in theirs. Or is there an
12 Exhibit 12 in that binder?

13 A Yes.

14 Q Yes. And maybe I can just show this on the Elmo as well.
15 That was -- we are talking about mine not yours.

16 MR. COLELLA: Right.

17 THE COURT: I don't have an Exhibit 12.

18 MR. SPITZ: That was the document that I presented to
19 you earlier.

20 THE COURT: Oh.

21 Q BY MR. SPITZ: And I said that that would go into our
22 binder, not theirs, for Exhibit 12. And it's on the screen as
23 well.

24 Do you recognize this document?

25 A Yes. Definitely.

26 Q And this is the -- let me turn to the third page of that.

1 This is in Arabic. Do you recognize this document?

2 A Yes.

3 Q Are you able to read the Arabic?

4 A Yes, of course. That's the general power of attorney.

5 Q What is all this writings down below?

6 A Signature of his beatitude, Fouad Twal. Then the three
7 Arabic very nice letters written there by the president of the
8 Canonical Court for LPJ, notarizing that this power of attorney
9 is correct by his Beatitude Fouad Twal and confirming the
10 signature of his Beatitude Fouad Twal.

11 Q Are you familiar with the signature of his Beatitude
12 Fouad Twal?

13 A Yes, of course, yes.

14 Q And does that resemble his signature?

15 A Yes.

16 Q And have you examined this document and compared it to the
17 translation that's on page 2 of this document?

18 A Yes.

19 Q And is this an accurate English translation of the Arabic
20 document on page 3?

21 A To the best of the purpose of the translation, yes. There
22 was a lot of things -- it's so hard to translate exactly,
23 especially wording, but it's to whatever purpose translated to,
24 yes.

25 Q When -- were you handed this document by his Beatitude?

26 A Yes.

1 Q And did he have some words to say at the time that he handed
2 you this document?

3 A His word that says a big trust and I hope -- of course he
4 told me, "you earned it" and "I hope we can work together" based
5 on this. He wanted me to do something based on this.

6 Q And what authority is your understanding that was provided
7 to you by this general power of attorney?

8 A That says the general power of attorney, the last line which
9 is the West Bank and the occupied 1948 territory and that's a
10 political term.

11 Q Were you able to sign contracts on behalf of his Beatitude?

12 A Yes. It states there.

13 Q Were you able to make commitments on behalf of his
14 Beatitude?

15 A Yes.

16 Q Were you entitled to buy and sell on behalf of his
17 Beatitude?

18 A Definitely.

19 Q Did that include real estate?

20 A Everything. It says that.

21 Q So it was all inclusive?

22 A Everything.

23 MR. COLELLA: I'm going to object to the extent it calls
24 for legal conclusion and the document speaks for itself.

25 THE COURT: So noted.

26 Q MR. SPITZ: Was that -- did you have that understanding from

1 his Beatitude directly that you could do that?

2 A Yes. Yes.

3 Q And did he at some point in time ask you to exercise that
4 authority?

5 A Yes.

6 Q And did that have to -- what did that have to do with where
7 he requested that you exercise the general power of attorney that
8 he issued?

9 A There was a lot of deals going on. Most of them related to
10 money laundering as an international thing. Starts all over
11 California, Jordan, Rome. I was asked to participate, use this
12 power of attorney to sign documents; refinance, negotiate banks,
13 everything. But mainly the financial scheme that they had in
14 their mind that I was unaware about.

15 Q Were those money laundering schemes to fund AUM?

16 A Yes.

17 Q Was some of the money going to go to pay back the
18 obligations they had for you?

19 A Yes.

20 Q When you agreed to the contracts initially, the service
21 contracts, the bus contracts, transportation, management, did you
22 know beforehand that you would be asked later on to sign money
23 laundering contracts?

24 A None of that ever discussed with me before signing the
25 contracts.

26 Q And did you -- what was your understanding -- your

1 understanding at the time you were given the opportunity to sign
2 those money laundering contracts as to the legality of entering
3 into those?

4 A You know, I am not expert with the money laundering scheme,
5 but at least I understood what was going on. I understood the
6 concept. At the very beginning I didn't have an understanding.
7 Then at certain point Charles Sweeney started opening up with me.
8 Fouad Twal opened up with me. His Excellency opened up with me.
9 And then Father Michael was sort of chancellor for his Beatitude
10 he start communicating with me, I want to say, on a daily base.

11 Q And what was his Beatitude Fouad Twal asking you to do?

12 A To pass all those deals.

13 Q To sign?

14 A Sign, pass it, provide whatever necessary, send your bank
15 account, receive.

16 Q Was this something you had agreed to do from the start?

17 A I never agreed to participate in any fraudulent transaction.

18 Q Okay.

19 A At any point.

20 Q Was your refusal part of the reason you no longer work
21 there?

22 A Yes.

23 MS. FRIEND: Objection.

24 Q MR. SPITZ: Was that the only reason in your understanding?

25 A Yes.

26 MR. COLELLA: Objection. Speculation.

1 Q MR. SPITZ: Were you told that?

2 A Straight in the face.

3 Q By who?

4 A By Fouad Twal, by Antonio Franco with respect to their
5 positions. So I get used to speaking then by his Beatitude, by
6 his Excellency, Antonio Franco. He's the Assessor of the Holy
7 Sepulcher at a grand magisterium. By his Excellency, Lahham. It
8 was straight, yes.

9 Q And if you would tell us what any of those individuals said
10 to you about this situation.

11 A About the situation Lahham was straightforward. He called
12 me in. I went there. And he asked me, "you know all those
13 deals?" I said, "yes, I know all those deals." "So now you know
14 it is a money laundering?" I said, "yes, I recognize that
15 because, you know, all these discussions, all these e-mails."
16 "And you know because you did not pass them and that goes back
17 deep to The Holy See. You are going to face a lot of trouble
18 based on that." I said, "yes."

19 I was called in on another occasion by his Excellency
20 Antonio Franco. I was called into the Vatican embassy in Amman,
21 Jordan. There was seven people, seven attendees at that time,
22 including the ambassador of the Vatican. It was a very heated
23 argument between me and his Excellency Antonio Franco.

24 Based on the power of attorney I was deeply involved with
25 the finances of AUM. I negotiated their budget. I initiated all
26 their defaulted loans with bankers. I help them establish a

1 decent accounting system. So I was deeply involved.

2 Antonio Franco was, "why you did not accept the 50 million to
3 your bank account?" I said, "I don't need 50 million."

4 MR. COLELLA: Objection. Hearsay. Narrative at this
5 point.

6 THE COURT: Sustained.

7 THE WITNESS: I never needed 50 million. I requested
8 7 million. Well, of those 7 million, there was a categorized
9 need for them to reestablish their relation with the banks and
10 we start -- we paying banks from AUM or LPJ as normal loans.
11 "Well, you need to accept those 50 million." "I don't need to
12 accept 50 million in my bank account. You can provide the
13 50 million to LPJ or AUM."

14 I cannot accept money in my bank account for two
15 reasons. First of all, I don't know the source of this money.
16 The second reason I am an American citizen. All my bank
17 accounts, every six months goes back to United States and being
18 reported under the FATCA law. If I don't report it, the banks
19 reports these bank accounts because when I open my bank accounts
20 in Jordan, I open them based on I am an American citizen, and I
21 sustain my residency in California with the address in
22 California. So I refuse to receive any money that is not a
23 clear money.

24 Then I had a discussion with his Beatitude Fouad Twal.
25 He invited me to Jerusalem with Father Michael attended the
26 meeting. He looked at me and he said, "You need to pass these

1 deals. We need this money." I looked at him, I said, "I will
2 not on my grave participate in selling a land belonged to
3 church." And this is our culture. It's hard to probably
4 understand. I will not participate in selling a land belong to
5 a church, a Holy Land. It's a political land. I will not
6 participate in that. I will not participate in any unclear
7 transactions.

8 "We will need to pay you." I said, "It doesn't matter.
9 You need to pay me but this is not part of the agreement. I
10 cannot participate on all those proceedings."

11 So it wasn't something as easy as it sounds now. It was
12 really heavy.

13 Q After that, were you -- what did they tell you about
14 staying?

15 A After that I stopped several -- I'm sorry.

16 I stopped several proceedings. The first one was a
17 Chinese deal 900 million divided into two portions. Two
18 portions. There was MOU, Memorandum of Understanding that was
19 submitted in one of these motions in this case. That deal was
20 very heavy. The base of the deal creating something called a
21 Green City. I have all the documentation. I have provided this
22 with everything related to the project.

23 MR. COLELLA: Objection. Relevance. Narrative.

24 MS. FRIEND: Join.

25 THE WITNESS: So that was the first deal I stopped --

26 Q MR. SPITZ: Were you asked to leave?

1 A I was asked to leave under threat.

2 Q Threat of what?

3 A We will bury you. Kill you and bury you at the interest of
4 AUM.

5 Q Do you feel you can go back there now?

6 A Oh, I can book a plane ticket but how long are we going to
7 stay under the sun, that's the question.

8 MR. SPITZ: No further questions.

9 THE COURT: Defense?

10 MR. COLELLA: Just briefly.

11 **REXCROSS-EXAMINATION**

12 BY MR. COLELLA:

13 Q The power of attorney we were looking at, Mr. Seryani?

14 A Yes.

15 Q Signed in Amman, Jordan, correct?

16 A Yes.

17 Q And this was a document, I believe, you used the word
18 canonical?

19 A I didn't use canonical. It was notarized, but the president
20 of the canonical court belonged to LPJ.

21 Q Okay. Okay. It identifies two witnesses. Do you know who
22 those witnesses are?

23 A I don't think there is any witnesses. It's empty. There is
24 no witnesses there.

25 Q Okay. Do you know if the witnesses are needed to make this
26 an effective document?

1 A No.

2 MR. COLELLA: I have no further questions.

3 THE COURT: Do you have any?

4 **CROSS-EXAMINATION**

5 BY MS. FRIEND:

6 Q Mr. Seryani, are you aware of something called the Arab
7 American Catholic Community?

8 A AACC, yes, I'm aware.

9 Q What is that?

10 A It's an organization of incorporation. I don't know what
11 they were registered but I know they are registered in California
12 and San Francisco. And they are the same entity. They operate
13 in Pomona and Redlands.

14 Q And are you a member of that?

15 A Used to be.

16 Q Is that the board that you were referencing earlier?

17 A Not the AACC in San Francisco. I was with the AACC Pomona.
18 Actually my wife and me. She was voted for and she joined but
19 the concept is a couple thing. Couple, together.

20 Q So you were a member of the board of the Arab American
21 Catholic Community in Pomona and in Redlands?

22 A Yes, ma'am.

23 Q Okay. And you mentioned -- I believe you testified earlier
24 that it was the parish of Pomona and Redlands but really it's the
25 Arab American Catholic Community not the overall parish that
26 you're a board member of, right?

1 A I'm talking about the community of the parish. I am not
2 talking about the church, parish that related to Los Angeles
3 diocese. But part of that church, that church has several
4 parishes under that umbrella. I know there was the Latino, I
5 know there was Filipino, and I know there was the Arabic
6 community and there was a schedule for each of them to perform in
7 their languages.

8 Q Okay. And the one that you were a member of was the Arab
9 American Catholic Community?

10 A Yes, ma'am.

11 Q Okay. You mentioned earlier the phrase an LPJ parish. What
12 did you mean by that? What is an LPJ parish?

13 A I'm referring to them as part of LPJ parishes.

14 Q So you're saying that a parish in Pomona and in Redlands is
15 considered an LPJ parish?

16 A The Arabic Catholic Community in Pomona and in Redlands,
17 part of LPJ extended parishes. I don't know how to rephrase it.

18 Q Okay.

19 MS. FRIEND: Thank you, I don't have any other further
20 questions.

21 THE COURT: Anything else?

22 MR. SPITZ: Just, your Honor, you had allowed me to read
23 a couple of passages from the deposition transcript of
24 Margarite Ramona. I have the ones that I have selected are in
25 my binder in the very front of it and highlighted. I provided
26 those to the Court. Now, I have the certified copy of the

1 transcript here, in case David doesn't have that handy, he can
2 look on with the certified copy of her transcript.

3 MR. COLELLA: I guess the only question is what's the
4 point if everything has been submitted of reading testimony into
5 the record?

6 MR. SPITZ: The only point is just to direct the Court's
7 attention to the most important provisions of her -- I doubt the
8 Court has time to read her entire transcript. But there are
9 significant provisions. I asked earlier in the beginning if I
10 may do that. And those are highlighted in the binder.
11 Hopefully the Court has my binder.

12 THE COURT: In the binder, what exhibit?

13 MR. SPITZ: In my exhibit binder.

14 THE COURT: Yeah, I have it.

15 MR. SPITZ: I thought it was at the beginning or
16 somewhere in there, there is some yellow highlighted sections of
17 the --

18 THE COURT: Oh.

19 MR. SPITZ: -- of the transcript, deposition transcript
20 of Margarite Ramona.

21 THE COURT: Yeah. I see the highlighted area.

22 MR. SPITZ: Okay. Those are the ones where she
23 describes the roughly million dollars being from donations in
24 the Western Lieutenancy that are transferred too for the work of
25 LPJ in the Holy Land. So those are the sections of her
26 deposition in which she speaks about the money coming from

1 California residents and going for the work of LPJ.

2 THE COURT: Okay.

3 MR. COLELLA: Your Honor, this has been briefed. This
4 is part of both our opening --

5 THE COURT: I don't need it to be reread.

6 MR. COLELLA: Okay.

7 THE COURT: Is there anything else?

8 MR. SPITZ: Nothing else.

9 MR. COLELLA: Nothing further, your Honor.

10 MS. FRIEND: Nothing further.

11 THE COURT: All right. Do the parties feel as if they
12 need to do anything else, submit anything supplemental, or are
13 we done with this --

14 MR. COLELLA: I believe we're good, your Honor. If your
15 Honor has any questions as you go through this, we're happy to
16 respond. I think this has been an exhaustive record, and I know
17 you have plenty of documents in front of you. So for my special
18 appearing clients, we're ready to submit.

19 MS. FRIEND: Same.

20 THE COURT: Okay.

21 MR. SPITZ: Well, you know, we had some officials of LPJ
22 who were ready to give testimony. The Court declined to have
23 that information. We think the essence of what they would have
24 testified to live is within those declarations that have already
25 been submitted.

26 THE COURT: Right.

1 MR. SPITZ: So it was simply -- I agree with the Court's
2 observation that hearing live testimony can be very beneficial
3 for the Court's ultimate decision in this. And so to the extent
4 that the Court wanted to see that, if the Court is satisfied
5 with what it's heard so far, we're willing to rest on that.

6 THE COURT: Okay. That's fine. We're fine. Okay.

7 MR. COLELLA: Can we deem the matter under submission,
8 your Honor?

9 THE COURT: Yeah.

10 MR. COLELLA: Thank you, your Honor.

11 MS. FRIEND: Thank you.

12 THE COURT: Thank you. January 25th.

13 MR. COLELLA: A control date, yeah.

14 THE COURT: Yeah. January 25th, 9:00 o'clock calendar.

15 MR. COLELLA: Thank you, your Honor.

16 THE COURT: Okay. Thank you.

17 **(Proceedings concluded.)**

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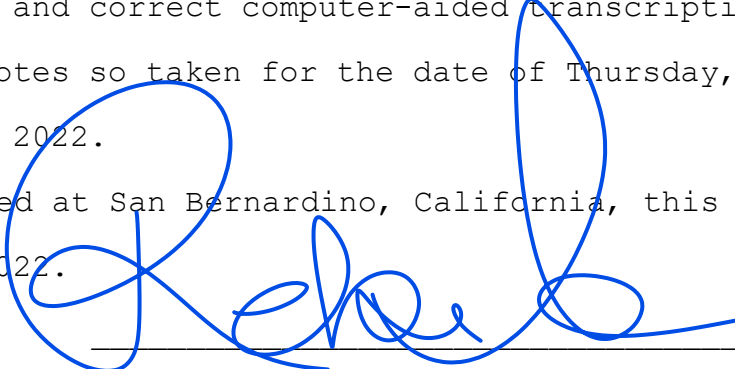
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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN BERNARDINO

BENJAMIN SERYANI AKA)
BENJAMIN SEMAAN SERYANI, an)
individual; and SYNERGY)
SELECT ONE, LLC, an Indiana)
Limited Liability) CASE NO. CIVDS1925212
Corporation doing business)
in California,)
)
Plaintiff,) REPORTER'S
) CERTIFICATE
vs.)
)
THE HOLY SEE AKA VATICAN)
CITY STATE (HS/VCS) AKA)
VATICAN NATION; ET AL,)
)
Defendants.)
_____)

I, Rebecca M. Allen, CSR, Official Reporter of the
above-entitled court, do hereby certify: That I am a Certified
Shorthand Reporter of the State of California, duly licensed to
practice; that I did report in Stenotype oral proceedings had
upon hearing of the aforementioned cause at the time and place
hereinbefore set forth; that the foregoing pages, numbered 1
through 42, constitute to the best of my knowledge and belief a
full, true, and correct computer-aided transcription from my said
shorthand notes so taken for the date of Thursday,
October 27, 2022.

Dated at San Bernardino, California, this 21st day of
November, 2022.



Official Court Reporter, CSR No. 13689