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1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

2 -----x
3 UNITED STATES OF AMERICA,

4 v.

23 Cr. 118 (AT)

5 MILES GUO,

6 Defendant.

Trial

New York, N.Y.
June 4, 2024
9:00 a.m.

7 -----x
8 Before:

9
10 HON. ANALISA TORRES,

11 District Judge
12 -and a Jury-

13 APPEARANCES

14 DAMIAN WILLIAMS

United States Attorney for the
Southern District of New York

15 BY: MICAH F. FERGENSON

RYAN B. FINKEL

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23 BY: E. SCOTT SCHIRICK

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1 ALSO PRESENT:
Isabel Loftus, Paralegal Specialist, USAO
2 Michael Gartland, Paralegal Specialist, USAO
Geoffrey Mearns, Paralegal Specialist, USAO
3 Robert Stout, Special Agent, FBI
Ruben Montilla, Defense Paralegal
4 Tuo Huang, Interpreter (Mandarin)
Shi Feng, Interpreter (Mandarin)
5 Yu Mark Tang, Interpreter (Mandarin)
Sarah Chiang, Interpreter (Mandarin)

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1 (Trial resumed; jury not present)

2 THE COURT: Good morning.

3 Please make your appearances.

4 MR. FERGENSON: Micah Fergenson, Ryan Finkel, Juliana
5 Murray, for the government. Justin Horton should be joining us
6 shortly, your Honor.

7 MR. SCHIRICK: Good morning, your Honor.

8 Scott Schirick, Sabrina Shroff, Sid Kamaraju, for
9 Mr. Guo, together at counsel table with Mr. Guo.

10 THE COURT: Please be seated.

11 Have you reached an agreement with regard to the
12 portions of the materials that the defense seeks to admit?

13 MR. SCHIRICK: Sure. I'm happy to address that, your
14 Honor.

15 I think we've decided to just move forward with
16 government exhibits that the government itself has already put
17 into evidence at this time.

18 THE COURT: Okay.

19 Are there any other issues you'd like to raise?

20 MR. FINKEL: Not so much an issue, your Honor, just
21 more of a housekeeping thing to alert the Court.

22 After Mr. Medrano, the government is going to call a
23 victim. That victim is going to introduce -- well, that victim
24 is going to testify about three recordings, one video and two
25 audio recordings. The video, the parties are still discussing

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1 a stipulation to the translation of it, it's a
2 Mandarin-language video. And we're hopeful we'll reach an
3 agreement on that.

4 What we propose to do is we're going to offer that
5 exhibit. The witness, we believe, will be able to authenticate
6 it; it's Mr. Guo speaking, so it's admissible. We'll play it
7 for the jury and just note that it will be translated at a
8 later time. If we can't reach a stipulation on it, we'll have
9 an expert testify as to its translation.

10 With respect to the two audio recordings, the witness
11 is just going to authenticate them; we are not seeking to admit
12 them at this time. They are audio recordings of Mr. Guo in
13 Discord chats regarding what we allege is the scheme. We're
14 just going to seek to authenticate them.

15 We would ask that to the extent the defense has an
16 authentication objection, that they raise it at this time since
17 this is the witness who can authenticate them; but we will
18 admit them later once we have a translation for them.

19 MR. SCHIRICK: Your Honor, I think we have a couple of
20 issues or questions with what Mr. Finkel just proposed.

21 One is we're not aware of what the foundation is for
22 the video exhibit that the government intends to introduce
23 through this witness, so that's one.

24 Second issue is, without a translation, I'm not sure
25 how we're supposed to cross-examine the witness with respect to

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1 the video. So the order of operation the government proposes I
2 think is just not one that is sort of workable as a practical
3 matter. You know, we'll take up any issues we have with
4 respect to authentication of the audio files which, you know,
5 we just received last night.

6 So this is all very late-breaking. The defense is
7 still reviewing what the government sent, you know, late last
8 night. So we will return with any issues we have on the
9 authentication there.

10 MR. FINDEL: Just briefly, your Honor. This video in
11 particular we got this weekend; we got it translated Monday.
12 Once we got the translation, we sent it to the defense. So
13 they have a translation and they're free -- it's a two-minute
14 video. They are free to cross-examine the witness using that
15 translation.

16 But, in any event, it's just Mr. Guo's statements;
17 it's not statements of the witness. So I don't really know
18 what the witness could say about what Mr. Guo said, other than
19 her interpretation of it. And they are free to cross-examine
20 her on the basis of our translation, which, to be clear, if
21 they agree with it -- and they don't have to, we understand that
22 -- we would be fine proceeding with that translation. But this
23 is the witness who could put that video in, so that's sort of
24 where we are.

25 THE COURT: But I hear them asking about

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1 authentication of the video also; am I correct?

2 MR. FINKEL: So with respect to authentication, we
3 believe this witness will be able to authenticate it. She, for
4 example, saw it on Mr. Guo's YouTube page. It's his YouTube
5 account, Mr. Guo's YouTube account. There's an image, screen
6 grab of that video on YouTube. She will be able to discuss, we
7 believe, that that's the subscriber name for Mr. Guo, she
8 recognizes that video, she saw it around the time it was
9 posted, which I understand is in 2019.

10 And it's a video in which -- just to explain to the
11 Court, it's a video in which Mr. Guo says that he will donate
12 \$100 million to the Rule of Law Foundation and Rule of Law
13 Society. And that was material, we submit, to that particular
14 victim and other victims.

15 THE COURT: Does the defense challenge the translation
16 of the video?

17 MR. SCHIRICK: Well, your Honor, we just received the
18 government's translation last night. We haven't had an
19 opportunity to evaluate it. And, you know, so that's number
20 one.

21 THE COURT: All right.

22 So you're saying you need more time.

23 MR. SCHIRICK: Correct. That's right, your Honor.

24 And if I can just raise two other points with respect
25 to the video.

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1 One is it appears to us – and again, we're still
2 looking into this – that the video the government intends to
3 offer is a clip of a much longer video that was posted. And
4 so, again, it's the same issue that we had yesterday, you know,
5 having an opportunity to review the full video for completeness
6 purposes, for context. This is not something that we've had an
7 opportunity to do, even if we were to accept the government's
8 translation.

9 And then the third point, your Honor, again, just to
10 return to the sort of practicalities. How we are supposed
11 to -- let me back up.

12 Our understanding is that the witness that Mr. Finkel
13 is referring to is going to testify in Mandarin through a
14 translator later this morning. So how we are supposed to
15 cross-examine a witness who is testifying in Mandarin, where we
16 don't have an agreed-upon stipulation as to the translation of
17 that, I'm just not sure how that's working.

18 THE COURT: Are you talking about the interpretation
19 of the testimony?

20 MR. SCHIRICK: No, your Honor, the video itself, the
21 video itself.

22 THE COURT: All right.

23 So, first of all, do you have the entire video?

24 MR. FINKEL: No, and we're not seeking to offer the
25 entire video.

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1 THE COURT: But that wasn't my question.

2 MR. FINKEL: Do I have the entire video?

3 THE COURT: Yes.

4 MR. FINKEL: I don't believe I do, but I believe it's
5 on the YouTube page. I'm not certain, and I don't want to
6 misrepresent something. To the extent we do -- maybe we do --
7 we'll provide it. In either event, I believe we can point them
8 to it on the YouTube page.

9 And just to be clear, your Honor, the government is
10 happy to allow the defense additional time to consider the
11 translation. But this witness is the witness who will speak --
12 will authenticate that video. And separate and apart from that
13 video, she will testify that Mr. Guo said in a video that he
14 would donate \$100 million. So we think that can come in.

15 With respect to timeliness on rule of completeness
16 issues, we won't object on timeliness -- we may object on other
17 grounds. But that's fine. We provided this translation as
18 soon as we could, but we understand it will take them some
19 time. That's no problem.

20 THE COURT: So if the witness appears today and they
21 have not resolved their questions about the translation of the
22 video and the audio recordings, I assume you'll hold the
23 witness over until tomorrow; is that correct?

24 MR. FINKEL: So, your Honor, this witness is traveling
25 from another state. She's a victim. We can certainly look to

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1 do that.

2 What I think though, your Honor, and what I would
3 respectfully propose is that she's going to testify as to her
4 understanding, which they can cross her on *vis-à-vis* the
5 translation that we've provided.

6 With respect to the video itself, the video itself
7 sort of speaks for itself. And the only issue, I think, would
8 be 106 -- 105, excuse me, rule of completeness issues, which if
9 they want to seek to offer from the longer video on his YouTube
10 page, we can deal with that down the road. We're not going to
11 object on timeliness.

12 THE COURT: So if the witness is on the stand, do you
13 plan to introduce the video?

14 MR. FINKEL: The video from the Rule of Law, yes. The
15 other two audio recordings we're not going to introduce, we're
16 just going to authenticate. And we can save the admission down
17 the road. Those we don't have a translation to, and so we
18 think that's a different category.

19 THE COURT: So is it that she would be looking at the
20 video, there would be no translation, it would just be Mr. Guo
21 speaking in Mandarin, and then you would ask her, What do you
22 understand him to be saying?

23 MR. FINKEL: I think we would do it in reverse, in
24 light of this issue; which is to say she would authenticate
25 this -- she would -- Victim, did there come a time, if ever,

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1 that Mr. Guo stated, you know, that he would donate 100
2 million, in a less leading fashion.

3 Yes.

4 How did you learn about that?

5 I watched a YouTube video about it.

6 And what is your understanding of what he said?

7 She'll testify.

8 Then we'll introduce, you know, Can you authenticate
9 this video clip?

10 Yes.

11 What is it?

12 That's the video where he said it.

13 Government offers. We would submit that's a proper
14 foundation and it's relevant and admissible as a defendant
15 statement. We could play it. And we'll just tell the jury -
16 and we'd ask your Honor to just tell the jury that a
17 translation will be made available later on in the trial.

18 If the parties are unable to stipulate to one, we will
19 put an expert on the stand to testify as to the translation.
20 Either way, there will be a translation. So I think that's how
21 we would propose handling that video.

22 The audio recordings we don't have a translation to.
23 She'll testify about what she recalls of the event and will
24 authenticate the recordings. But we're not going to admit them
25 at this time.

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1 MR. SCHIRICK: Your Honor, just one last point.

2 Even what Mr. Finkel proposes here doesn't solve the
3 fundamental issue, which is that we still have no ability this
4 morning, as we are here in court, to cross-examine the witness
5 with respect to the video or any aspects of the video because
6 we don't have a translation.

7 MR. FINKEL: They do have a translation. We provided
8 the translation right after we got it on Monday afternoon, I
9 think about 5 o'clock. I think we got it in the trial day. As
10 soon as the trial day was done, I sent it over. It's a
11 two-minute clip; the translation, I believe, is one page, maybe
12 one page and a half. And they have had access to translators.

13 MR. SCHIRICK: Your Honor, I believe we received this
14 at about -- my recollection is it was sometime around midnight
15 last night. You guys can correct me if I've got it wrong,
16 there are a lot of emails flying around.

17 MR. FINKEL: That's incorrect.

18 It was after the trial day; I don't remember the exact
19 time. It might have been 6 o'clock or so, I'm not certain, but
20 it wasn't midnight.

21 THE COURT: All right.

22 Would you check your emails, please.

23 MR. FINKEL: Sure.

24 MR. SCHIRICK: Again, your Honor, with respect to the
25 clipping issue, unless this witness is going to testify that

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1 she was responsible for clipping the portions that the
2 government seeks to introduce, there's still a missing link
3 there as to how the government gets from the video that they
4 say was posted on YouTube to the clip, again, none of which
5 we've had an opportunity to evaluate.

6 MR. FINKEL: Your Honor, that's not correct.

7 She needs to lay an authentication foundation. And if
8 the witness said -- and all that needs to happen is a witness
9 says something is what it purports to be. And if the witness
10 says that's a video or a clip of a video that she saw on
11 Mr. Guo's YouTube page -- and your Honor can look at the video,
12 which is Mr. Guo speaking, which is part of the analysis
13 whether it passes authenticity thresholds -- it's authentic, at
14 least for the jury to consider its weight. If they want to
15 attack the clipping aspect, they're free to do so, but that
16 would go to its weight, not its admissibility.

17 So, your Honor, this video should come in if they want
18 to cross her on her understanding of what it is. They are free
19 to do so. They have her 3500 in which she explains what it is.
20 That isn't a surprise and they have the translation of the
21 clip.

22 THE COURT: So do you have the email?

23 MR. FINKEL: Okay. So, your Honor, we sent a draft
24 translation yesterday at 11:57 a.m. We sent the certified
25 marked translation -- which might have cosmetic differences -- at

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1 5:30 p.m. yesterday.

2 THE COURT: All right. So that is an adequate amount
3 of time for you to review the translation.

4 MR. SCHIRICK: Your Honor, I think we -- respectfully,
5 with the volume of emails and updates that are coming from the
6 government, both during the trial day and after the trial day,
7 I'm not sure I agree that that's adequate time to have an
8 outside translation service check the government's translation
9 and enough time for us to evaluate it, when we just received
10 the video for the first time in the middle of the trial day
11 yesterday.

12 THE COURT: All right. So you must be nimble as a
13 litigator and be able to evaluate this material swiftly.

14 What they have proposed, the length of time that you
15 have had to review it, it's not an unreasonable amount of time.
16 I am always one who believes that these items should be turned
17 over as soon as possible so that the defense has the
18 opportunity to evaluate it. And I think in this case you've
19 had an appropriate length of time.

20 MS. SHROFF: Your Honor, actually we don't have access
21 to an interpreter that way in terms of documents or
22 translations. The interpreters who are translating for the
23 Court are not allowed to translate documents; we've checked
24 that before. And we have very limited access beyond that
25 point.

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1 Also, as we've repeatedly told the government, the way
2 they are sending emails, they do not reach -- I'm sorry -- they
3 do not reach Mr. Schirick. Whatever email address they are
4 sending it to -- and I believe I noted this to the government
5 even yesterday -- he does not get the emails.

6 So I think there was a lapse between the time they
7 sent the email to us and the emails from Mr. Schirick which
8 they know are bouncing back. So I believe I'm the one who
9 emailed back and I said you have to include him on that email,
10 but I don't know on what chain that was.

11 But I can tell the Court that we do not have this easy
12 access to interpreters that the government is talking about.
13 So I do want -- I wanted to correct that, your Honor.

14 And I think that I reached out to the court
15 interpreters, not yesterday, but a few days ago to see if they
16 could translate some documents for us. They checked with the
17 interpreters' office and were told they cannot.

18 So we are struggling with trying to put people in
19 place to do the translations. And even if it came in at 5:30,
20 we had an influx of at least seven other documents at 1 a.m. --
21 I think it was 1 a.m. And we had government exhibits at 1
22 a.m.; we had 3500 material at 1 a.m., all of which required
23 USAfx download. I know the time because I did the download.

24 So I ask the Court most respectfully to allow us at
25 least a break, because we're not in a position to have done the

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1 work that the Court thinks we should have been able to do. And
2 we will try to do better, of course; we will try and see if we
3 can line somebody up. I've already reached out. But we didn't
4 have that access yesterday.

5 THE COURT: So you are retained; correct?

6 MS. SHROFF: Yes, your Honor.

7 We are retained, but it's not -- it's not as wide as
8 the Sargasso Sea. We have people who are trying to help us the
9 most they can. And I just want to make sure that the
10 government -- I apologize -- the Court is aware of the traffic
11 that's coming in just on translations. I'm not talking about
12 3500 material from Mr. Weber that is being produced to us in
13 court or an English-speaking witness. That's not what I'm
14 talking about. I can cope. But I cannot cope with asking
15 for -- I can't find an interpreter to go with me on the weekend
16 to a jail anymore. On the long weekend I found no one who
17 could go.

18 So we're struggling. It's not just money. People
19 have to agree to do -- to come in.

20 MR. FINKEL: Two brief points, your Honor.

21 First, the government wants to work with the defense
22 and, candidly, has been working with the defense quite well on
23 translation issues and stipulations and things like that. And
24 we hope to continue to do that. That's first.

25 Second, I'm not going to get into the nuances of who's

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1 getting emailed or not --

2 THE COURT: But that is important.

3 MR. FINKEL: So then I'm happy to.

4 We did email the translation to Mr. Schirick; he's on
5 the email. We were told to actually send all emails to a
6 LISTSERV that Pryor Cashman has set up called The Guo Team. We
7 understand that's The Guo Team. So we have been including them
8 on such distributions; and included them on the distribution, I
9 believe, right, at 5:57. I'll confirm that.

10 What I can also tell the Court is after I submitted --
11 I sent the email at 5:57, which was the marked certified
12 version, not just the draft. I had a back-and-forth with
13 Mr. Barkan. Mr. Barkan was checking that translation - it's
14 not very long - with an automated translation service. I
15 didn't hear from him any substantive objections to it.

16 All that being said, your Honor, the government has no
17 objection to giving the defense an appropriate amount of time
18 this morning to listen to that video more quickly -- more
19 thoroughly. They obviously have their client here who spoke in
20 the video and can explain them things. And that's no problem.
21 So that's sort of where we come out on that.

22 Sort of at bottom is this witness is the witness who
23 can authenticate this video. It was material to her. She's
24 going to tell the jury about that. And so we believe it's an
25 appropriate exhibit. To the extent they want to introduce

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1 other portions of the longer recording, we're not going to
2 object on timeliness grounds. We might object on other
3 grounds, but we can deal with that later.

4 THE COURT: What about the claims that emails to
5 Mr. Schirick are bouncing back?

6 MR. FINKEL: So, your Honor, this email was sent
7 directly to Mr. Schirick. I don't believe it bounced back.
8 It's right there. It's his email address at Alston. There
9 are, I think, 12 or so different attorneys who are working on
10 the defense team, maybe less, maybe some are paralegals, I
11 don't know, but there's a large group. We were told to email
12 The Guo Team at Pryor Cashman, which encompassed everyone.
13 We've been endeavoring to do that. Sometimes there are email
14 chains with various attorneys.

15 THE COURT: So the question then, Mr. Schirick, is did
16 you receive the email at the time that they claim that you
17 received it?

18 MR. SCHIRICK: Honestly, your Honor, I'd have to look.
19 I've been trying to do so on my phone, but the volume of emails
20 that we receive from the government is making it difficult for
21 me to identify that.

22 THE COURT: Okay. Please take a look.

23 MR. SCHIRICK: Sure.

24 MS. SHROFF: Your Honor, I also just want to say that
25 the government has been aware that The Guo Team email does not

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1 work for either Mr. Schirick or for me; we are not part of the
2 Pryor Cashman law firm. The government has repeatedly noted
3 that those emails bounce back.

4 In response, I literally sent an email saying:
5 Mr. Schirick needs to be added on separately. And I added the
6 Alston email address to that email chain. The defense added it
7 on. I'm not talking just about this email, I'm just talking
8 generally. That I repeatedly -- well, not repeatedly. I told
9 the government that The Guo Team email does not work for people
10 who are outside of Pryor Cashman.

11 Put that aside.

12 I am telling the Court that we did not have access to
13 any interpreter yesterday evening that would have been able to
14 translate for us. That's what I'm saying. And if the
15 government thinks -- also, I'm not really sure --

16 THE COURT: Ms. Shroff, you should be putting a
17 translator on retainer so that they are available continuously
18 to you.

19 MS. SHROFF: And they are. And they are translating
20 other documents that are repeatedly flowing in. I do not
21 believe the -- I really didn't focus on it yesterday, the 5:27
22 email, and if somebody could check. But I don't think that
23 email even says that we are planning to introduce this
24 tomorrow, so please flag this for immediate attention. I don't
25 think anybody paid any mind to it because of the traffic, I

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1 have to say honestly.

2 I don't think the email said anything about the
3 exhibit being used tomorrow. And we have more than one person
4 helping us translate. People don't want to work around the
5 clock. They are not interested. We have a limited pool.
6 We've tried to hire a lawyer who speaks the language, and even
7 that person only works limited hours.

8 And I'm happy *ex parte*, your Honor, to share the email
9 back-and-forth as to what other things we're having those
10 people translate.

11 THE COURT: Mr. Schirick.

12 MR. SCHIRICK: Yes. Thank you, your Honor.

13 THE COURT: Did you get the email?

14 MR. SCHIRICK: I did, in fact, receive the email.

15 I will just add that it was not clear at least to me
16 from context, when that email came across from Mr. Finkel, that
17 the government's plan was to use that exhibit with this witness
18 tomorrow.

19 THE COURT: All right. So now the government knows
20 the difficulties that you've been having with translation. And
21 the government, going forward, will point out that an
22 attachment needs to be translated because you intend to use
23 that during witness testimony.

24 MR. FINKEL: Your Honor, yes.

25 And indeed, the 11:57 email was the proposed

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1 translation and certificate. The 5:57 email, which was the
2 marked version, said: Please let us know if you'll stipulate
3 to the accuracy of the attached translation or if you have any
4 corrections to it. We may offer this video tomorrow, meaning
5 today.

6 THE COURT: So I just don't think you can ask more of
7 the prosecution. They've alerted you to the fact that they
8 intend to introduce certain evidence. They have alerted you to
9 the fact that you need to check the translation to see if you
10 will agree and stipulate to the translation.

11 What more do you want?

12 MR. SCHIRICK: Your Honor, it's simply Ms. Shroff's
13 point: We're focusing narrowly on this one particular email
14 and this one particular document. But we can represent to the
15 Court, and I don't think there would be any dispute between the
16 parties that the volume of productions not only of 3500, but of
17 additional exhibits, in addition to witness orders changing
18 pretty much every day, you know, from the Saturday email that
19 comes out where the government first tells the defense who it
20 plans to call, you know, I think last week that list changed
21 virtually on a daily basis.

22 So just to give the Court some context, you know, it's
23 not just about this single particular email - obviously that's
24 why we're discussing this now, it's ripe, the witness is going
25 to testify today. But the defense is dealing with a lot of --

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1 a tremendous influx of information that's coming from the
2 prosecution, and changes both in order and changes in exhibits.
3 And then when you throw a translation issue on top of that,
4 which is often the case, it makes it very difficult to deal
5 with when it's all happening at the last minute. And we just
6 want to give the Court that context.

7 THE COURT: Well, I think that most attorneys in
8 Manhattan would agree that you have some of the finest defense
9 lawyers on your team. Perhaps you need to augment and add
10 someone in order to cope with the volume of information that is
11 coming your way.

12 MS. SHROFF: We have tried to find someone who speaks
13 the language, your Honor. Again, I'm happy to come to sidebar
14 *ex parte* and show the Court. But I can assure you that we have
15 no interest in not checking a translation if we have the
16 manpower. Again, I did not look at the 5:30 email
17 substantively at all. That might have been my error.

18 But I can assure you we have more than one person with
19 dual language skills helping us, and I'm not sure I can find
20 more, but I will endeavor to try. I had one other translator
21 that I was using that was traveling up until now, hopefully she
22 will be back and into circulation, and we will try to do
23 better.

24 But for today's witness, we are where we are, and I'm
25 not really sure how else I can fix the problem.

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1 THE COURT: So the question is now when is it that
2 you'll review the translation with regard to the video?

3 Mr. Finkel, are you proposing that they do that before
4 you call your witness?

5 MR. FINKEL: Your Honor, we have no objection to
6 either. If they want to take the time now, it's certainly your
7 Honor's prerogative. If they want to take the time now, the
8 government has no objection to that, and that's fine. We can
9 start a little bit delayed today, that's fine. If they want to
10 wait until after Mr. Medrano, for example, and then review,
11 that's fine too. We can give the jury a break after
12 Mr. Medrano. The government is fine either way.

13 THE COURT: Mr. Schirick, did you want to say
14 anything?

15 MR. SCHIRICK: The defense would prefer, all things
16 being the same, to take a break after Mr. Medrano. We're
17 hopeful of getting a translation a bit later this morning,
18 perhaps around noon.

19 THE COURT: Very well.

20 Is there anything before I have the jurors come in?

21 MS. SHROFF: Your Honor, just one very small matter.

22 Would it be possible for people to be seated in the
23 third row on the side? I'm hold that there are people who want
24 a seat and there is no more overflow room. So I was asked to
25 request of the Court, and I'm just asking, that's all.

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1 THE COURT: I'll consider that, but I don't have an
2 answer for you right now.

3 MS. SHROFF: Yes, your Honor.

4 THE COURT: Would you have the jurors come in.

5 MS. SHROFF: Your Honor, may I step out? I am just
6 going to try and find the interpreter.

7 THE COURT: I am having the jurors come in.

8 MS. SHROFF: Okay.

9 (Continued on next page)

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25

064VGU01

Medrano - Cross

1 (Jury present)

2 THE COURT: Would you have the witness resume the
3 stand, please.

4 Please be seated.

5 Good morning, jurors.

6 THE JURY: Good morning.

7 THE COURT: Good morning.

8 THE WITNESS: Good morning.

9 THE COURT: Remember that you're under oath.
10 Please resume cross-examination.

11 MR. SCHIRICK: Thank you, your Honor.

12 SHAMEL MEDRANO,

13 called as a witness by the Government,

14 having been previously duly sworn, testified as follows:

15 CROSS-EXAMINATION (continued)

16 BY MR. SCHIRICK:

17 Q. Mr. Medrano, excuse me, thank you for coming back --

18 A. Of course.

19 Q. -- this morning.

20 I believe yesterday when the trial day ended, we were
21 watching a video. I'm going to just take you back slightly to
22 a different video, and then we will resume with that video just
23 so that everyone understands from context, including, most
24 importantly, Mr. Medrano.

25 MR. SCHIRICK: So if we can please pull up Government

O64VGU01

Medrano - Cross

1 Exhibit C-63-T.

2 Q. Mr. Medrano --

3 MR. SCHIRICK: I'm sorry. I apologize.

4 Let's first pull up Government Exhibit Z-9 at page 6.
5 Apologies.

6 Q. Okay. Mr. Medrano, you recall yesterday testifying about
7 the summary chart that's in evidence as Government Exhibit Z-9,
8 right?

9 A. Correct.

10 Q. Do you recall testifying about this particular entry that
11 is dated June 2, 2020?

12 A. Yes, I do.

13 Q. And you see here that the source of the selected content is
14 Government Exhibit C-63?

15 A. Yes.

16 MR. SCHIRICK: Okay. And now if we could please go to
17 Government Exhibit 63-T.

18 MR. FERGENSON: Your Honor, that's not in evidence.

19 THE COURT: I don't have that in my book here.

20 Would you refer to the page.

21 MR. SCHIRICK: 63-T is not in the book, your Honor.

22 And if I may just have a moment with Mr. Fergenson.

23 THE COURT: Okay.

24 (Counsel conferred)

25 MR. FERGENSON: I'm sorry, your Honor. It wasn't

O64VGU01

Medrano - Cross

1 offered by me, but it was offered earlier by Ms. Murray. It's
2 my mistake. It is in evidence.

3 THE COURT: Is it in the book?

4 MR. SCHIRICK: No, your Honor. I believe the Court
5 and the jury has only the summary chart, which is Z-9. This is
6 the underlying document, which is a transcript which we will
7 display for everyone.

8 THE COURT: Thank you. Go ahead.

9 MR. SCHIRICK: So now if we can please pull up 63-T.
10 Thank you.

11 BY MR. SCHIRICK:

12 Q. Again, Mr. Medrano, this is one of the source documents for
13 that entry in the chart that we were just looking at a moment
14 ago; correct?

15 A. Correct.

16 MR. SCHIRICK: Okay. And if we can please go to page
17 5 of this document.

18 Q. Mr. Medrano, are you familiar with something called the
19 NFSC?

20 A. I am not.

21 Q. Okay. If we can focus your attention on the entry in this
22 chart that is marked with the time mark 7:09. Do you see it at
23 the bottom there?

24 A. Yes, I do.

25 Q. I'm just going to read from the bottom there, and you'll

O64VGU01

Medrano - Cross

1 let me know if I get this right, please.

2 "Now in the United States, some people who are in
3 collusion with the communist party, agents, spies, sent out by
4 the communist party, people of common interests have completely
5 disregarded the rules of law of the United States and are
6 strongly attacking all our media."

7 MR. SCHIRICK: I'm sorry, I think we've lost it on the
8 screen. If we can --

9 THE COURT: One moment, please.

10 Mr. Garcia, if you would please step over here.

11 Go ahead.

12 MR. SCHIRICK: Thank you, your Honor.

13 If we can please move to the next passage for what's
14 being displayed to the jury.

15 Q. "So my dear fellow fighters, it can be said that from our
16 entire media platform and whistleblower movement's fellow
17 fighters, the efforts of billions of fellow fighters have
18 awakened the world.

19 "At the same time, we are set up, and we have become
20 the biggest enemy of the communist party and the groups that
21 they fear the most. This includes the \$4 billion that the
22 communist party has spent to stop, to halt; hackers are trying
23 to stop the ceremony of the declaration of our founding of the
24 New Federal State of China tomorrow, June 3rd at 7 p.m., new
25 York time, and the day after, that is, before 12 p.m. on

O64VGU01

Medrano - Cross

1 June 4.

2 "Now, the \$4 billion has seeing the first results, the
3 impact and the infiltration in social media - Twitter, YouTube,
4 Facebook and other major media, including hacking have reached
5 military level like never before.

6 "However, I believe that it will not stop our fellow
7 fighters from aspiring to freedom, to dignity, to have a family
8 that can live without fear, and to a safe, good life."

9 Did I read that correctly Mr. Medrano?

10 A. You did.

11 THE COURT: One moment, please.

12 Go ahead.

13 MR. SCHIRICK: Thank you, your Honor.

14 Q. Mr. Medrano, that excerpt that I just read was not in the
15 summary chart that you created; correct?

16 A. I don't believe so, no.

17 Q. Okay. Thank you.

18 MR. SCHIRICK: Now, if we can please go to the video
19 that we were watching at the end of the trial day yesterday
20 that includes Mr. Bannon. We won't replay the entire thing,
21 we'll pick up just about 15 seconds or so before we ended
22 yesterday for context. But for the record, this is Government
23 Exhibit W1005-B in evidence.

24 (Video played)

25 MR. SCHIRICK: Thank you.

O64VGU01

Medrano - Cross

1 Q. Now, Mr. Medrano, if you could please turn to Government
2 Exhibit Z-11, which should be -- we should have a hard copy of.

3 A. I don't have a hard copy of that one.

4 MR. SCHIRICK: May I approach, your Honor?

5 THE COURT: You may.

6 Q. Mr. Medrano, the passage that we just listened to on the
7 video, that's not included in your summary chart, is it?

8 A. It is not included in the summary chart.

9 Q. And would you agree with me that the passage that we just
10 listened to and watched, in fact, comes in between the first
11 entry on the summary chart and the second entry on the summary
12 chart?

13 A. I don't know what time this video was played at. I mean,
14 if you --

15 Q. Okay. We're happy to play it again for context.

16 A. No, no, I understand. I'm saying the first passage on the
17 summary chart, it indicates 1:16:15; the next one is at
18 1:23:34. What you currently played, I'm not sure when it was,
19 so I wouldn't be able to say if it was played in between.

20 Q. Sure. And I'll represent to you that what we just watched
21 began at 1:23:10 and ended at 1:23:44.

22 A. Got it. Okay.

23 Q. So would you agree with me that what we just watched comes
24 in between the first entry on that chart and the second entry
25 on the chart?

O64VGU01

Medrano - Redirect

1 A. Yes.

2 Q. Okay. Mr. Bannon didn't mention in the clip that we just
3 watched anything about the Rule of Law fund, right?

4 A. In the clip that we just watched?

5 Q. Correct.

6 A. I do not recall hearing that, no.

7 Q. And Mr. Bannon didn't mention anything in that clip about
8 \$100 million donation to any foundation, right?

9 A. I don't recall hearing that, no.

10 Q. And you recall yesterday --

11 THE COURT: Mr. Medrano, if you would speak into the
12 microphone.

13 THE WITNESS: Sorry, your Honor.

14 Q. And you recall yesterday that I asked you about this
15 watermark that is displayed on the exhibit that's on your
16 screen in the upper left-hand corner, "Guo Media"?

17 A. Correct.

18 Q. And you don't know whether Mr. Guo financed with his "own
19 money" Guo Media's activities, do you?

20 A. I don't know.

21 MR. SCHIRICK: No further questions at this time.

22 THE COURT: Redirect.

23 MR. FERGENSON: Thank you, your Honor.

24 REDIRECT EXAMINATION

25 BY MR. FERGENSON:

O64VGU01

Medrano - Redirect

1 Q. Good morning again, Mr. Medrano.

2 A. Good morning.

3 Q. You were asked questions about statements Guo made about
4 the CCP, do you recall that?

5 A. Yes.

6 MR. FERGENSON: Ms. Loftus, if we could please publish
7 Stip 2. Stip 2. Government Exhibit Stip 2.

8 Q. Mr. Medrano, do you see this says "stipulation regarding
9 web pages and videos"?

10 A. Yes.

11 MR. FERGENSON: If we could go to page 24, Ms. Loftus.

12 Q. And Mr. Medrano, do you see the second one from the top is
13 GXW1012 and GXW1012-V?

14 A. Yes.

15 MR. FERGENSON: The government offers Government
16 Exhibit GXW1012 and 1012-V.

17 MR. SCHIRICK: Can we just have one moment, please?

18 MR. FERGENSON: Ms. Loftus, if we can just show just
19 the witness and counsel GXW1012-V. And we don't want to play
20 any sound, but maybe we can click through a couple portions of
21 the video so they can see. If you can click through a few --

22 MR. SCHIRICK: Your Honor, no objection; although it's
23 hard to tell whether this video is going to take us beyond the
24 scope of cross.

25 THE COURT: It is admitted.

O64VGU01

Medrano - Redirect

1 MR. FERGENSON: Thank you, your Honor.

2 (Government's Exhibits GXW1012 and GXW1012-V received
3 in evidence)

4 MR. FERGENSON: Ms. Loftus, if we could please publish
5 this video now.

6 (Video played)

7 MR. FERGENSON: Ms. Loftus, we could go to Government
8 Exhibit Z-9 at page 99, please. And if we could zoom on the
9 bottom entry there.

10 BY MR. FERGENSON:

11 Q. Mr. Medrano, focusing you on GXC221, what's the date of
12 that entry in the chart?

13 A. June 6, 2021.

14 Q. Where was it posted?

15 A. GTV.org.

16 MR. FERGENSON: Ms. Loftus, can we please play
17 GXC221-T.

18 MR. SCHIRICK: Your Honor, beyond the scope.

19 THE COURT: If you'll step up please.

20 (Continued on next page)

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1 (At sidebar)

2 THE COURT: What is it that you're seeking?

3 MR. FERGENSON: This is another music video; it's
4 titled "Hero," in which they discuss the CCP, your Honor. He
5 was asked questions about did you review statements about Miles
6 Guo talking about the CCP. This is responsive.

7 MR. SCHIRICK: Two things, your Honor:

8 First of all, I asked whether in the context of the
9 specific documents that I focused on, whether Mr. Medrano or
10 the government included statements about the defendant's
11 anti-CCP position. I didn't ask generally whether he reviewed
12 anything about that that goes to anti-CCP, number one. So this
13 is well beyond the scope.

14 Number two, I believe at the end of that first clip,
15 there wasn't a single question put to the witness about that
16 document. The government is merely using this as a vehicle to
17 play additional documents to the jury, and they have no
18 questions for Mr. Medrano; they didn't ask one at the end of
19 that, and they did the same thing yesterday, so I suspect they
20 are going to continue to do it again.

21 MR. FERGENSON: Excuse me, Ms. Shroff.

22 THE COURT: Let's take turns, please.

23 He started first. Go ahead.

24 MR. FERGENSON: Thank you, your Honor.

25 Just on the last point, Mr. Medrano is a summary

064VGU01

Medrano - Redirect

1 witness. I'm happy to pose a question to him, but he has no
2 personal knowledge of the case. But after playing the video
3 I'm fine doing that.

4 With respect to --

5 THE COURT: But his point was that he did not ask
6 generally about whether he knew about Mr. Guo's comments about
7 the CCP. He was referring to specific material. This is now
8 different from that.

9 MR. FERGENSON: Actually, your Honor, I believe that
10 the question posed initially with him was, you know, you
11 didn't -- there wasn't statements in this chart or you didn't
12 testify about statements about the CCP, right?

13 THE COURT: Okay. So then let's go back and take a
14 look. If you could go to the beginning of his cross.

15 (Record reviewed)

16 THE COURT: I just went through the cross-examination.
17 I don't see a reference to the CCP, or he's not asking whether
18 the witness knew of any material contained in the documents
19 referring to the CCP.

20 MR. FERGENSON: Your Honor, it was yesterday at the
21 very start of his cross-examination. And obviously the scope
22 of redirect is not just the cross this morning, but the full
23 cross.

24 THE COURT: No.

25 MR. FERGENSON: The very first --

O64VGU01

Medrano - Redirect

1 THE COURT: No. The scope of the recross -- the scope
2 of the redirect goes to.

3 MR. FERGENSON: The cross.

4 THE COURT: Exactly.

5 MR. FERGENSON: And his first question yesterday, your
6 Honor, was on direct: Did the government take you through any
7 selected content in the chart in which Mr. Guo talks about the
8 CCP?

9 And this is in the chart, and it's about the CCP. So
10 we want to play it. It will take four minutes. It's in
11 evidence. That's it.

12 THE COURT: Okay. So that was at the beginning of the
13 cross yesterday. You agree that that's accurate?

14 MR. SCHIRICK: If that's what the transcript says, I
15 have no doubt.

16 MS. SHROFF: Yes, but it's about the selected videos
17 that he's shown. It's not about the CCP in general.

18 MR. FERGENSON: This is one of them.

19 MS. SHROFF: Please don't interrupt me now.

20 Your Honor, if you just take a look at the videos,
21 these videos are not about the CCP and Mr. Guo. The videos are
22 about opulence and Mr. Guo. This is why the government chose
23 to hold those videos until they could be played on redirect.

24 So the entire clip now is not even a statement by
25 necessarily Mr. Guo; it is an advertisement that he made and he

O64VGU01

Medrano - Redirect

1 is pictured in it. They are not his statements in the sense
2 that Mr. Guo was giving a speech or he's saying something. The
3 next video clip I'm pretty sure is Mr. Guo dancing or some such
4 thing. It's beyond the pale of what is a statement that can be
5 attributed to Mr. Guo. It is also cumulative, your Honor.

6 THE COURT: In that video, does he address the CCP?

7 MS. SHROFF: No.

8 MR. FERGENSON: Yes.

9 MS. SHROFF: I believe there's a song about the CCP; I
10 don't think he ever opens his mouth and speaks.

11 MR. FERGENSON: He's the singer.

12 MS. SHROFF: Excuse me, sir.

13 THE COURT: One moment, please.

14 MS. SHROFF: He doesn't speak. The song is in the
15 background.

16 THE COURT: Is he the singer?

17 MS. SHROFF: I couldn't tell. If he's --

18 MR. FERGENSON: Yes.

19 MS. SHROFF: If he's singing on an overlay, it's still
20 a song, it's not a statement.

21 THE COURT: One moment.

22 MS. SHROFF: In a recent case before --

23 THE COURT: Sorry. One moment.

24 So you're saying that it is his voice singing about
25 the CCP; is that correct?

O64VGU01

Medrano - Redirect

1 MR. FERGENSON: Yes. And it's in evidence already.
2 I'm just going to play four minutes of it.

3 MS. SHROFF: And under the recent --

4 THE COURT: If it's his singing about the CCP, these
5 are statements, song statements.

6 MS. SHROFF: Well, your Honor, there is recent
7 rulings, especially one by DeArcy Hall, the Honorable DeArcy
8 Hall in the Eastern District of New York, that rap lyrics in
9 songs about the content of what somebody is or is not doing are
10 not necessarily admissible in statements attributed to that
11 person.

12 MR. FERGENSON: This is in evidence.

13 MS. SHROFF: Because it is in evidence does not mean
14 it is properly before the jury for this particular point, sir.
15 For this particular point. It is not a statement from Mr. Guo,
16 his mouth is not making the statements; it's an overlay song.
17 Your next video is about him dancing.

18 What the government is trying to show here is his
19 opulence. It is very prejudicial to play it at this juncture.
20 And if the Court can just take a look at the videos before they
21 are played to the jury, maybe it would understand the argument
22 I'm inarticulately trying to make, which is it is both
23 cumulative and prejudicial to do it now.

24 THE COURT: Let me start by saying that I love Judge
25 DeArcy Hall --

O64VGU01

Medrano - Redirect

1 MS. SHROFF: I do, too.

2 THE COURT: -- and I admire her thinking. But this is
3 a different case, a very, very, very different case.

4 What does the song say in the video?

5 MR. FERGENSON: So it goes to their argument that he
6 is a legitimate dissident being oppressed by the communist
7 party holding these rallies. They played that clip of him at
8 the Rule of Law launch where he's talking about being attacked.

9 THE COURT: What is said in the lyrics?

10 MR. FERGENSON: I don't have it memorized, but he's
11 basically talking about how the CCP is coming after them, we're
12 going to fight them. That's essentially it.

13 THE COURT: What's the name of the song?

14 MR. FERGENSON: "Hero," your Honor. It's called
15 "Hero." And it's him dancing around with people, and it goes
16 to it. It's four minutes long. It's in evidence, it will be
17 shorter than the sidebar.

18 MS. SHROFF: It goes to his opulence, which is what
19 this video went to. He doesn't -- excuse me. The song never
20 once says he is being persecuted or prosecuted by the CCP. In
21 fact, he's just talking about the general world fighting CCP.

22 And I think if the government really is firm on its
23 argument, they should get the lyrics to the Court, because
24 never once does Mr. Guo say the CCP is coming after me; here I
25 am fighting back.

O64VGU01

Medrano - Redirect

1 THE COURT: So Mr. Guo holds himself --

2 (Indiscernible crosstalk)

3 THE COURT: Don't talk over me, Ms. Shroff.

4 MS. SHROFF: Sorry.

5 THE COURT: Mr. Guo holds himself out as a leader of
6 the anti-CCP movement. We've had witnesses who have stated
7 that they relied on his representations.

8 MS. SHROFF: True.

9 THE COURT: It is relevant and it comes in.

10 (Continued on next page)

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1 (In open court)

2 THE COURT: Overruled.

3 MR. FERGENSON: Ms. Loftus, if we could please publish
4 Government Exhibit C221-V. And if we could play the video,
5 please.

6 (Video played)

7 MR. FERGENSON: If we could pause it.

8 BY MR. FERGENSON:

9 Q. Mr. Medrano, what does it say on your screen?

10 A. "Hero."

11 MR. FERGENSON: If we could play that, please.

12 (Video played)

13 MR. FERGENSON: Ms. Loftus, we can stop there. And if
14 we could go back to Government Exhibit Z-9, and we'll go to
15 page 15.

16 Q. Mr. Medrano, you were asked questions on cross-examination
17 about the NFSC, do you recall that?

18 A. Yes.

19 Q. All right. Now, looking at this entry on the chart on page
20 15, what's the date of this entry?

21 A. June 28, 2020.

22 Q. Where was it posted?

23 A. GNews.org.

24 Q. And are there subtitles on this video?

25 A. Yes.

O64VGU01

Medrano - Redirect

1 Q. So before we read the subtitle, can you read the caption to
2 the right of the date?

3 A. "The NFSC, G Series and Himalaya Farms."

4 Q. Can you read the subtitle, please.

5 A. "Me, Miles Guo, will never ask for a cent from you for G
6 Series."

7 MR. FERGENSON: Ms. Loftus, could we please play
8 Government Exhibit C160-V.

9 MR. SCHIRICK: Objection. Scope.

10 THE COURT: Overruled.

11 MR. FERGENSON: Thank you, Ms. Loftus. We'll just
12 play the first few seconds.

13 (Video played)

14 MR. FERGENSON: Pause it.

15 Q. Now, Mr. Medrano, how long is this video?

16 A. 25 minutes and 26 seconds.

17 Q. The whole video is in evidence; correct?

18 A. Yes.

19 MR. FERGENSON: All right.

20 Now, Ms. Loftus, let's go back to the chart.

21 Q. And Mr. Medrano, I'm not going to play the full video, but
22 could you please read the text that's in the chart underneath
23 GXW160-V.

24 And we'll go until a little bit onto page 16, but you
25 can start reading on page 15, please.

O64VGU01

Medrano - Redirect

1 A. "The NFSC, please remember in the future, that it is a
2 quasi-political entity. The G Series, GTV, G Fashion, G Club,
3 G Coin, and G Dollar have no substantial connections with the
4 NFSC.

5 "It is like an NGO. But the G Series are completely
6 commercial institutions, including the Himalaya Farms. The
7 Himalaya Farms across the world are registered as limited
8 companies all according to local law depending on how much you
9 invested. The amount you invested will determine through a
10 shareholder system how much power, level of management
11 authority and profit sharing you entitled to possess.

12 "To the bothers in arms who wanted to donate to the
13 Himalaya Farms, let me say this once again: Any Himalaya Farm
14 that accepted donations will all be disqualified. You can
15 invest, but you cannot donate. Our whistleblower movement does
16 not tolerate the act of asking for money.

17 "Me, Miles Guo, will never ask for a cent from you for
18 G Series. Don't confuse the investment with this donation."

19 Q. And you can just read -- we'll end with the next excerpt,
20 please, Mr. Medrano.

21 A. "This is completely a business operation. Do not link the
22 G Series under any circumstance to the NFSC. That is all
23 bullshit."

24 MR. FERGENSON: No further questions.

25 THE COURT: Recross.

O64VGU01

Medrano - Recross

1 RECCROSS EXAMINATION

2 BY MR. SCHIRICK:

3 Q. Mr. Medrano, does the fact that the NFSC may be separate
4 from any G Series investments as you just saw in that document
5 make Miles Guo any less of a political dissident?

6 MR. FERGENSON: Objection.

7 THE COURT: Sustained.

8 MR. SCHIRICK: No further questions.

9 THE COURT: All righty. Thank you. You may step out.

10 THE WITNESS: Thank you, your Honor.

11 (Witness excused)

12 THE COURT: And the government may call its next
13 witness.

14 MR. HORTON: Your Honor, the government is happy to
15 call our next witness. We had understood the Court wished to
16 take a break after Mr. Medrano to address an issue.

17 THE COURT: That is correct. I did state that I
18 wanted to take a break at this time.

19 And so, members of the jury, remember that you're not
20 allowed to discuss this case amongst yourselves or with anyone
21 else. And don't do any research about the case and don't read
22 any accounts in the news media or any other source.

23 You may step out.

24 (Jury not present)

25 (Continued on next page)

0641GU02

Jenny Li - Direct

1 (Jury not present)

2 THE COURT: How long does the defense need?

3 MR. SCHIRICK: Your Honor, I think 15 or 20 minutes,
4 if that is okay with the Court?

5 THE COURT: All righty. We'll take 20 minutes.

6 MR. SCHIRICK: Thank you, Judge.

7 (Recess)

8 (Jury not present)

9 THE COURT: Please be seated.

10 A few minutes ago, when I was looking for the door for
11 the robing room, I mistakenly opened the door of the jury room.
12 When I saw that, I simply said, "Sorry about that," and turned
13 around. Is there anything that you would like me to do with
14 respect to that?

15 MR. FINKEL: Not from the government.

16 MS. SHROFF: Not from the defense, your Honor. Thank
17 you.

18 THE COURT: Please have the jurors return, and please
19 have the witness come in.

20 (Continued on next page)

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0641GUO2

Jenny Li - Direct

1 (Jury present)

2 THE COURT: Please be seated.

3 And the prosecution may call its next witness.

4 MR. HORTON: Your Honor, the government calls Jenny
5 Li.

6 THE COURT: You may take the stand.

7 MR. HORTON: And your Honor, Ms. Li will be assisted
8 by a Mandarin-language interpreter.

9 THE LAW CLERK: Please raise your right hand.

10 (Witness sworn)

11 THE COURT: Please be seated and state your name and
12 spell it.

13 THE WITNESS: (In English) Jenny Li. J-E-N-N-Y, first
14 name. Last name, L-I, Li.

15 THE COURT: Please speak into the microphone so that
16 everyone can hear you.

17 THE WITNESS: (In English) Sorry. My name is Jenny,
18 first name, J-E-N-N-Y, first name. The last name, L-I, Li.

19 THE COURT: You may inquire.

20 MR. HORTON: Thank you, your Honor.

21 JENNY LI,

22 called as a witness by the Government,

23 having been duly sworn, testified as

24 follows, through a Mandarin-language

25 interpreter:

0641GUO2

Jenny Li - Direct

1 DIRECT EXAMINATION

2 BY MR. HORTON:

3 Q. Good morning, Ms. Li.

4 A. Yes, hello.

5 Q. What state do you live in?

6 A. Nevada.

7 Q. Do you have any children?

8 A. Yes.

9 Q. How many children do you have?

10 A. One.

11 Q. And how old is your child?

12 A. 36 years old.

13 Q. Are you married?

14 A. Yes.

15 Q. Ms. Li, were you ever a follower of Miles Guo?

16 A. Yes.

17 Q. Are you currently a follower of Miles Guo, Ms. Li?

18 A. No.

19 Q. Ms. Li, do you see Miles Guo in the courtroom today?

20 A. Yes.

21 MR. SCHIRICK: Your Honor, we'll stipulate that
22 identification.

23 THE COURT: All right, then. Please continue.

24 Q. Ms. Li, what year was it that you first heard of Miles Guo?

25 A. 2017.

0641GUO2

Jenny Li - Direct

- 1 Q. And where did you first see Miles Guo in 2017?
- 2 A. I met him on April 19 for the first time.
- 3 Q. And where did you see Miles Guo on April 19, 2017?
- 4 A. Voice of America.
- 5 Q. And what happened when Miles Guo was on Voice of America in
- 6 2017?
- 7 A. So he was doing a livestreaming over there and to disclose
- 8 the corruption of CCP.
- 9 Q. When you saw Miles Guo for the first time in 2017, what, if
- 10 anything, did you think about him?
- 11 A. At that time I didn't have any thought of him whatsoever.
- 12 Q. And how often, if ever, Ms. Li, did you watch Miles Guo's
- 13 videos after that first time you saw him in 2017?
- 14 A. After that, out of curiosity, I kept watching his videos.
- 15 Q. And you said you kept watching them. How often were you
- 16 watching them?
- 17 A. I almost watched all his livestreaming whenever available.
- 18 Q. And what was it about these videos of Miles Guo that made
- 19 you want to keep watching them?
- 20 A. He was disclosing the corruption of Chinese government
- 21 officials and also some men and women sexual relationships.
- 22 Q. And in these videos, Ms. Li, what, if anything, did Miles
- 23 Guo say about his money?
- 24 A. He said he didn't take any money out of China.
- 25 Q. And what, if anything, was Miles Guo wearing in these

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1 videos?

2 A. A lot of times he wearing a very nice suit, and most of the
3 time he wearing sunglasses.

4 Q. And from what location was Miles Guo broadcasting these
5 videos?

6 MR. SCHIRICK: Objection, foundation.

7 THE COURT: Sustained.

8 Q. Ms. Li, could you tell when you watched these videos where
9 Miles Guo was filming them?

10 A. From place for media.

11 Q. And what kind of room was Miles Guo in in these videos?

12 MR. SCHIRICK: Objection. We're talking about
13 multiple videos?

14 THE COURT: Are you asking her to describe a
15 particular video?

16 MR. HORTON: Let me try the question a different way,
17 your Honor.

18 BY MR. HORTON:

19 Q. Ms. Li—Ms. Li, what's the Sherry?

20 A. So Guo was—Miles Guo purchased the 18th floor at Sherry,
21 and he thought—he bought it, the 18th floor.

22 Q. And where did you learn that Miles Guo purchased the 18th
23 floor of the Sherry?

24 A. He often mentioned it in his own livestream.

25 Q. Ms. Li, did there come a time that you heard about

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1 something called the Rule of Law Fund?

2 A. Yes.

3 Q. And who did you first hear mention the Rule of Law Fund?

4 A. Miles Guo and Bannon established this Rule of Law
5 Foundation on November 20, 2018.

6 Q. And what happened in November 2018?

7 A. So what happened, it was Guo, Miles Guo claimed that the
8 executive from HNA in China, that he suddenly pass away, and
9 Guo Wengui claimed that he was murdered by CCP.

10 Q. Ms. Li, where, if ever, did you see Miles Guo and Steve
11 Bannon talk about the Rule of Law Fund?

12 MR. SCHIRICK: Objection, form.

13 THE COURT: Overruled. You may answer.

14 A. YouTube.

15 Q. And what did you watch on YouTube?

16 A. Miles Guo and Bannon established this Rule of Law
17 Foundation.

18 Q. And—

19 THE COURT: I would like the parties and the
20 interpreter to step up, please.

21 (Continued on next page)

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1 (At the sidebar)

2 THE COURT: Can you do a simultaneous translation?

3 THE INTERPRETER: For who?

4 THE COURT: Interpreting for the witness. Instead of
5 waiting for her to say something and then she ends and you
6 interpret, can you do it simultaneously?

7 THE INTERPRETER: But I think for the accuracy
8 sometimes for the witness, it's always done consecutively. I
9 can try—

10 THE COURT: I've been doing this for 24 years and I
11 have had many cases with simultaneous translation. Some
12 interpreters don't know how to do it. And so I'm asking you,
13 can you do it?

14 THE INTERPRETER: I can do, yes.

15 THE COURT: Okay. That's what we'll do going forward.

16 THE INTERPRETER: Okay. Excuse me. Your Honor, and
17 also, I have to interpret the counsel's question
18 simultaneously?

19 THE COURT: Yes.

20 THE INTERPRETER: And I think I need to have a partner
21 to work with, because for the—I think I cannot do alone by
22 myself for long period of time, simultaneously.

23 THE COURT: Are you saying that you cannot do
24 simultaneous translation?

25 THE INTERPRETER: I can do it simultaneously, but I

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1 need someone to take turn with me.

2 MS. SHROFF: She needs to switch out.

3 THE COURT: But if you don't do the simultaneous
4 translation, you don't need a partner?

5 THE INTERPRETER: Yeah. I can do maybe two hours, but
6 with simultaneous mode, I need a partner.

7 THE COURT: Do we have another interpreter, maybe?

8 MR. FINKEL: Your Honor, we can check with the
9 interpreters—well—we can check with the interpreters. We're
10 apparently not allowed to use the court interpreters.

11 THE COURT: That's right.

12 MR. FINKEL: We can try to find someone. I don't know
13 if we can, but we'll try.

14 THE COURT: If you make that attempt. In the
15 meantime, you're going to do consecutive translation.

16 THE INTERPRETER: Okay.

17 MR. FINKEL: Thank you.

18 MR. HORTON: Thank you.

19 (Continued on next page)

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1 (In open court)

2 THE COURT: Please continue.

3 MR. HORTON: Thank you, your Honor. Just one moment,
4 please.

5 BY MR. HORTON:

6 Q. Ms. Li, you said you saw a video on YouTube with Miles Guo
7 and Steve Bannon talking about the Rule of Law Fund; is that
8 right?

9 A. Yes.

10 Q. And what, if anything, was said in this video, Ms. Li,
11 about how the Rule of Law Fund would be financed?

12 A. Miles Guo said that he would donate 100 million US dollars
13 into this Rule of Law Foundation.

14 Q. And when else, if ever, Ms. Li, did you hear Miles Guo talk
15 about his donations to the Rule of Law Foundation?

16 A. He didn't say much. He was just saying that he would try
17 to help people that disappeared in China.

18 Q. And the YouTube video you mentioned where Miles Guo talked
19 about donating a hundred million dollars to Rule of Law, when
20 did you see that, what year?

21 A. November 20, 2018.

22 Q. And other than that 2018 video, Ms. Li, when else, if ever,
23 did you see Miles Guo talk about donating to the Rule of Law
24 Foundation?

25 MR. SCHIRICK: Objection. Asked and answered.

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1 THE COURT: Overruled. You may answer.

2 A. He said he was going to donate 100 million US dollars.

3 THE COURT: If you would please move closer to the
4 microphone, Ms. Li, so that you can be heard.

5 MR. HORTON: Ms. Loftus, can you display for the
6 witness what's marked as Government Exhibit VI191.

7 Q. Ms. Li, what is this document?

8 A. So this is in 2019 that Guo, he show up again for the
9 second time. This was also on YouTube and GTV. And this
10 is—he was saying again that he would donate 100 million US
11 dollars. At the same time he would match 1 dollar to 1 dollar;
12 to whoever make a donation, he would do the matching.

13 Q. And did you watch this video, Ms. Li?

14 A. Yes.

15 Q. When did you watch it for the first time?

16 A. So first time was 2018. This was second time.

17 Q. Sorry. Ms. Li, when did you watch this video?

18 MR. SCHIRICK: Asked and answered.

19 THE COURT: Overruled. You may answer.

20 A. The second time was March 29, 2019.

21 Q. And where was this video clip located?

22 A. This was on YouTube.

23 MR. HORTON: Your Honor, the government offers
24 Government Exhibit VI191.

25 MR. SCHIRICK: Objection. Can we have a brief

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1 sidebar.

2 THE COURT: Okay.

3 (At the sidebar)

4 THE COURT: What's the objection?

5 MR. SCHIRICK: Your Honor, I don't see how the witness
6 can identify this video when he hadn't even played it for her,
7 how she can identify it coming from a specific date. As we
8 discussed, it's also clear that this is a bit of a much longer
9 video, and there's been no foundation laid about the clip, who
10 made the clip, you know, when the clip was made, which calls
11 into question the admissibility.

12 THE COURT: She can testify about what she saw. It is
13 more proper for the clip to be displayed first so the witness
14 can identify it, so please do that.

15 (Continued on next page)

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Jenny Li - Direct

1 (In open court)

2 MR. HORTON: Ms. Loftus, can you please pull up for
3 the witness what's been marked as Government Exhibit VI192.

4 MR. SCHIRICK: Your Honor, I don't know if the
5 intention is to play the clip for the jury to hear before the
6 witness has properly identified the document.

7 THE COURT: You can show her without audio and ask
8 whether she can identify this video in that way.

9 MR. HORTON: Yes, your Honor. Thank you.

10 Ms. Loftus, on mute, can you please scrub through the
11 video of GX VI192.

12 (Video played for witness)

13 BY MR. HORTON:

14 Q. Ms. Li, do you recognize this video?

15 A. Yes.

16 Q. And how do you recognize it?

17 A. So it was livestreamed Guo Wengui on GTV, and it was the
18 same as the previous one.

19 MR. HORTON: Your Honor, the government would offer
20 Government Exhibits VI191 and 192.

21 MR. SCHIRICK: We maintain our objection, your Honor.
22 If we can have one further brief sidebar?

23 THE COURT: Yes.

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1 (At the sidebar)

2 THE COURT: So for you to authenticate the audio also,
3 is there a way that we can have headphones put on her, perhaps?

4 MR. HORTON: What I was thinking, your Honor, is, the
5 audio is in Mandarin, so the jury is only going to be hearing
6 Mandarin audio.

7 THE COURT: I don't know. Maybe there are members of
8 the jury who speak Mandarin.

9 MR. KAMARAJU: The way this is—I'm sorry, your Honor.
10 I didn't mean to interrupt. The way I've seen this happen in
11 trial is that there are headphones for the witness, the Court
12 and the parties, and the audio is played through the
13 headphones, the witness can then identify it. That's just been
14 my experience of how this is done. We have to try to
15 authenticate audio outside the presence of the jury.

16 THE COURT: So I assume you don't have the headphones
17 set up at the moment.

18 MR. FINKEL: We don't, your Honor. What we propose is
19 that we can play it outside the presence of the jury at the
20 lunch break, which is coming up. We can authenticate the
21 audio. And in the meantime, move on. We'll come back to it
22 after lunch.

23 THE COURT: Okay.

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Jenny Li - Direct

1 (In open court)

2 THE COURT: Please continue.

3 MR. HORTON: Ms. Loftus, you can please take the
4 exhibit down.

5 We'll come back to that, Ms. Li.

6 BY MR. HORTON:

7 Q. Did there come a time that you donated money to the Rule of
8 Law Foundation?

9 A. Yes.

10 Q. And when did you donate to the Rule of Law Foundation?

11 A. In August of 2019.

12 Q. And how many times, Ms. Li, did you donate to the Rule of
13 Law Foundation?

14 A. I don't remember exactly how many times, but I have a rough
15 amount, since I have receipts.

16 Q. And in total, how much did you donate to Rule of Law?

17 A. 6,000 something.

18 Q. You said you donated for the first time in 2019. Why, if
19 at all, Ms. Li, did you not donate when you first heard about
20 Rule of Law in 2018?

21 MR. SCHIRICK: Objection.

22 THE COURT: Sustained.

23 Q. Ms. Li, what reason, if any, did you donate in 2019?

24 A. The first time that I donate to the Rule of Law Fund was
25 because the Hong Kong ELAB movement; therefore, there was a

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1 protest, a girl that her eye was injured. That was my first
2 donation of fund.

3 Q. And Ms. Li, what, if anything, did Guo say about how many
4 people were donating to Rule of Law?

5 MR. SCHIRICK: Objection.

6 THE COURT: Are you referring to the video that's in
7 evidence?

8 MR. HORTON: I was referring to—she had testified
9 that she had watched a number of his videos over a long period
10 of time. I was asking if she heard him say anything on that
11 subject.

12 THE COURT: Sustained.

13 BY MR. HORTON:

14 Q. Ms. Li, between when you first saw Miles Guo in a video in
15 2017 and the end of 2019, how often did you watch his videos?

16 MR. SCHIRICK: Asked and answered.

17 THE COURT: You may answer.

18 A. I would watch all his livestreaming whenever it's
19 available.

20 Q. And how many days a week were you watching his videos over
21 those two years?

22 A. So five to six days a week. He would report to the media
23 every very so often.

24 Q. And from watching those videos, Ms. Li, what, if anything,
25 did Guo say about how many people were donating to the Rule of

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1 Law Foundation?

2 A. He said many people will make the donation.

3 Q. And what effect, if any, did hearing Guo say that many
4 people were donating have on you?

5 A. It triggered me that I should also make the donation as
6 well.

7 Q. And what about hearing Guo say that many people were
8 donating triggered you to make your own donations?

9 A. Because there is \$100 million of the donation by him.

10 MR. HORTON: Ms. Loftus, if you could pull up for the
11 witness what's marked as Government Exhibit VH8, please.

12 Q. Ms. Li, what is this document?

13 A. This is the receipt donation, my receipt donation.

14 Q. And it's your receipt donation to what, Ms. Li?

15 A. The Rule of Law Foundation.

16 MR. HORTON: Government offers Government Exhibit VH8,
17 your Honor.

18 MR. SCHIRICK: No objection.

19 THE COURT: It is admitted.

20 (Government's Exhibit VH8 received in evidence)

21 MR. HORTON: Could you please publish it, Ms. Loftus.

22 BY MR. HORTON:

23 Q. Ms. Li, what was the date of your \$300 donation to Rule of
24 Law that's shown here?

25 A. April 15.

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1 Q. And what year was that?

2 A. 2020.

3 Q. Ms. Li, I want to turn to May of 2020. What was GTV?

4 A. GTV is the livestreaming platform and media established by
5 Miles Guo.

6 Q. Did you watch GTV?

7 A. Yes.

8 Q. And in May of 2020, Ms. Li, what, if anything, was Miles
9 Guo saying about GTV?

10 MR. SCHIRICK: Objection.

11 THE COURT: You may answer.

12 A. He said GTV is media that you can say whatever you want and
13 it can grow as big as the YouTube.

14 Q. Ms. Li, what was Voice of Guo Media?

15 A. So Voice of Guo Media is Guo and Wei. This is the same
16 company as the GTV. And so for which amount more than 100,000
17 will go to Guo. That's—then 100,000 will go to Wei.

18 Q. And did there come a time, Ms. Li, that you sent money to
19 Voice of Guo Media?

20 A. Yes.

21 MR. HORTON: Ms. Loftus, can you show the witness
22 what's been marked as Exhibit VH7.

23 Q. Ms. Li, what is this document?

24 A. This is a check that I give him for \$10,000.

25 Q. And at the top left of—sorry.

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Jenny Li - Direct

1 MR. HORTON: Your Honor, the government would move to
2 admit VH7.

3 MR. SCHIRICK: No objection.

4 THE COURT: It is admitted.

5 (Government's Exhibit VH7 received in evidence)

6 MR. HORTON: Ms. Loftus, could you please publish it.

7 BY MR. HORTON:

8 Q. Ms. Li, at the top left corner of the check is a name.

9 MR. HORTON: Ms. Loftus, can you highlight that,
10 please.

11 A. That's my husband's name.

12 Q. Okay. And why is your husband's name on this check,
13 Ms. Li?

14 A. We have the same account.

15 Q. For what reason were you sending \$10,000 to Voice of Guo in
16 2020?

17 A. So Guo established GTV. He said this is investment in the
18 GTV.

19 Q. And was \$10,000 the only money you sent to invest in GTV?

20 A. No.

21 Q. How much did you invest in GTV?

22 A. 20,000.

23 Q. Ms. Li, who did you communicate with at Voice of Guo Media?

24 A. Lihong Wei.

25 Q. And how did you know to communicate with Lihong Wei?

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1 A. It was according to Miles Guo said on GTV.

2 Q. What English name, if any, does Lihong Wei go by?

3 A. Sara Wei.

4 MR. HORTON: Ms. Loftus, could you please show the
5 witness Government Exhibit 120.

6 Q. Ms. Li, who is depicted in Exhibit 120?

7 A. Lihong Wei, Sara Wei.

8 MR. HORTON: Government offers Government Exhibit 120.

9 MR. SCHIRICK: No objection.

10 THE COURT: It is admitted.

11 (Government's Exhibit 120 received in evidence)

12 Q. Ms. Li, why did you want to invest \$20,000 in GTV?

13 A. I was investing in the GTV stock.

14 Q. And when you sent money to Voice of Guo, was that the only
15 time you invested in GTV stock?

16 MR. SCHIRICK: Objection. Asked and answered.

17 THE COURT: Overruled. You may answer.

18 A. There are another two bank wire transfers for \$5,000 each
19 time.

20 Q. Ms. Li, what did you think would happen when you invested
21 in GTV stock?

22 A. Miles Guo said we invested in stock of GTV, that GTV's
23 stock price will higher than YouTube. What we purchased was
24 the original stock.

25 Q. Ms. Li, what was a farm loan?

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- 1 A. This is another fraud, money collection scheme.
- 2 Q. And how, if at all, did you participate in the farm loans?
- 3 A. I put in \$60,500 in total.
- 4 Q. And who did you first hear describe farm loans?
- 5 A. Miles Guo.
- 6 Q. And what did Miles Guo say about farm loans?
- 7 A. So he said that the private funding for GTV stock is
- 8 already closed so if you want to put extra money, there's
- 9 another project to put the money in, which is the farm loan.
- 10 Q. And Ms. Li, what, if anything, did you expect to get by
- 11 making farm loans?
- 12 A. GTV stock.
- 13 Q. What year did you invest \$60,500 in the farm loans?
- 14 A. From September 2020 to November 2020.
- 15 Q. Ms. Li, what was G/CLUBS?
- 16 A. So G/CLUBS is the member of the club that registered in
- 17 names of Miles Guo.
- 18 Q. And who did you first hear mention G/CLUBS?
- 19 A. GTV.
- 20 Q. What, if anything, did Miles Guo say about G/CLUBS?
- 21 A. So he said G/CLUBS is the member-only club that has the
- 22 certain benefit for 10,000 to \$50,000.
- 23 Q. Did you spend money on G/CLUBS, Ms. Li?
- 24 A. Yes.
- 25 Q. How much did you spend on G/CLUBS?

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1 A. \$20,000.

2 Q. What year did you spend \$20,000 on G/CLUBS, Ms. Li?

3 A. It was November—October to November of 2020. I don't
4 remember exactly. I have receipts.

5 MR. HORTON: Ms. Loftus, would you show Ms. Li what's
6 marked as VH9. Thank you, Ms. Loftus.

7 Can you scroll through the pages of the document.

8 Q. Ms. Li, what is this document?

9 A. So this is the registration or consent form for G/CLUBS
10 member.

11 Q. Did you receive this document?

12 A. I didn't receive this document.

13 Q. Ms. Li, is your name on this document?

14 A. Yes, it's there. I filled in the form online.

15 Q. Okay. And can you say where on this document your name is.

16 A. On the second row.

17 Q. And what does that line say?

18 A. This row indicates my name.

19 MR. HORTON: Your Honor, the government offers GX VH9.

20 MR. SCHIRICK: Just a moment, your Honor.

21 (Counsel conferring)

22 MR. HORTON: Ms. Loftus, could you take it down for
23 one moment, please.

24 Could I have a moment, your Honor.

25 THE COURT: Yes.

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1 MR. HORTON: Thank you.

2 (Counsel conferring)

3 MR. HORTON: Thank you, your Honor.

4 If you could, Ms. Loftus, if you could put that
5 document back up for the witness, please.

6 BY MR. HORTON:

7 Q. And Ms. Li, what is the date of this document, at the top,
8 where it says Sent?

9 A. November 9, 2020.

10 MR. HORTON: Ms. Loftus, could you just zoom in on the
11 Sent date.

12 And your Honor, the government offers Exhibit VH9.

13 MR. SCHIRICK: No objection, your Honor.

14 THE COURT: It is admitted.

15 (Government's Exhibit VH9 received in evidence)

16 BY MR. HORTON:

17 Q. Ms. Li, what is the date that this document was sent?

18 A. November 28th.

19 MR. HORTON: And Ms. Loftus, if you could go back to
20 the main document.

21 Q. And Ms. Li, what is this document?

22 A. This is my payment receipt.

23 Q. When you sent \$20,000 to G/CLUBS, Ms. Li, what, if
24 anything, were you expecting to get?

25 A. Also GTV stock.

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1 Q. And why were you expecting to get GTV stock for your
2 investment in G/CLUBS?

3 A. Can I say it? Can I say it or—

4 THE COURT: You may answer the question.

5 A. Okay. So he said the money going to G/CLUBS is also can
6 receive the stock for GTV, and also, I can also enjoy the
7 member benefit for this \$20,000; I can get a discount on
8 merchandise and also 20 percent off on purchasing a house.

9 Q. And Ms. Li, which of those benefits, if any, did you get?

10 A. Nothing.

11 Q. Ms. Li, if the G/CLUBS membership were only the benefits
12 and not the GTV stock, would you have bought it?

13 MR. SCHIRICK: Objection.

14 THE COURT: Overruled. You may answer.

15 A. Yes.

16 Q. So Ms. Li, if you knew that by investing \$20,000 in
17 G/CLUBS, you would only get the benefits you described but not
18 GTV stock, would you still have invested?

19 MR. SCHIRICK: Objection. Asked and answered.

20 THE COURT: Sustained. Don't answer.

21 MR. HORTON: May I have a moment, your Honor.

22 THE COURT: You may.

23 BY MR. HORTON:

24 Q. Ms. Li, you said that he described benefits in GTV stock
25 for G/CLUBS memberships. Who was "he"?

1 A. So all the names that have G in front, that is the G
2 member.

3 Q. And when you say the G member—

4 A. That is Guo Wengui member.

5 Q. My question is withdrawn.

6 MR. HORTON: Your Honor, at this point I'm going to
7 move on to a different topic. I'm happy to do that, or if
8 you'd like to take the break, I just want to—

9 THE COURT: Even though it's only 11:29, we will take
10 our break now.

11 So you'll come back at noon. Remember, don't discuss
12 the case amongst yourselves, don't do any research, and don't
13 listen to any reports or any descriptions concerning this case.

14 (Continued on next page)

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Jenny Li - Direct

1 (Jury not present)

2 THE COURT: So we turn now to the authentication of
3 the video. How long of a clip did you plan to play?

4 MR. HORTON: Your Honor, I think the total clip is
5 about two and a half minutes, but I think we can authenticate
6 it by playing a portion of that.

7 THE COURT: All righty. If you'll be seated. Thank
8 you.

9 MR. HORTON: Ms. Loftus, can you bring up for the
10 witness, please, GX VI192.

11 THE COURT: Before we start, is there any objection to
12 playing a portion as opposed to the full clip?

13 MR. SCHIRICK: Your Honor, it's the defense's position
14 that to identify it, you should be playing the full clip.

15 THE COURT: Okay. So you'll play the full clip.

16 MR. HORTON: Okay. And Ms. Loftus, with the audio on,
17 could you please play this clip.

18 (Video played)

19 BY MR. HORTON:

20 Q. Ms. Li, what is the video that we just watched?

21 A. So this is the second time that I saw Miles Guo. He said
22 he was going to donate \$100 million into the Rule of Law Fund.

23 MR. HORTON: Your Honor, the government offers
24 GX VI192 and 191.

25 THE COURT: It is admitted.

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1 (Government's Exhibits VI191, VI192 received in
2 evidence)

3 THE COURT: So we will return at noon to continue with
4 the direct examination of the witness.

5 Ma'am, you're not permitted to discuss this case
6 during the break.

7 MR. HORTON: Your Honor, if I may, briefly, just
8 before we leave. One of the last questions I asked, your Honor
9 sustained an objection to "asked and answered."

10 And actually, now that I think about what I'm about to
11 say, I wonder if it's better for the witness to leave before I
12 ask the Court about this.

13 THE COURT: Yes. If you'll step out now and return,
14 ready to walk into the courtroom at noon.

15 (Witness not present)

16 THE COURT: Go ahead.

17 MR. HORTON: Thank you, your Honor. Just two brief
18 matters.

19 The first is that your Honor sustained an "asked and
20 answered" objection to a question I asked Ms. Li about—it was
21 a hypothetical about a fact that was in evidence, about whether
22 she would have invested in G/CLUBS, and it had been asked and
23 answered, and I just want to explain why I asked it again. It
24 was also an improper—I'm sorry. It was also a compound
25 question, so it was not—

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1 THE COURT: A what kind of question?

2 MR. HORTON: A compound question. I asked her, If you
3 had only gotten the benefits and not the stock, would you have
4 still invested, so it was a poorly constructed question, and I
5 apologize for that. The reason I repeated a variation of the
6 question but it was substantively similar, after your Honor
7 sustained the "asked and answered" objection, is that I had a
8 basis to believe that the question was not properly translated
9 to Miss Li, and that's based on what I've heard Ms. Li say
10 about her purposes for investing in G/CLUBS. And so my purpose
11 was not simply to sort of blow through your Honor's sustained
12 objection. I think what I did is, in asking it in a compound
13 way through the translator and as a hypothetical, I just
14 offered a very poorly constructed question. What I would ask
15 the Court's permission to do is ask her if she had not—if she
16 knew she wouldn't get stock in GTV, would she have invested in
17 G/CLUBS; take the compound out of it and just ask her that
18 hypothetical that is consistent with the Court's pretrial
19 rulings on hypotheticals to victims.

20 MR. KAMARAJU: Your Honor, you swore in the
21 interpreter, you swore in the interpreter to interpret
22 faithfully. Mr. Horton is not a Mandarin expert, and I don't
23 think he's allowed to second-guess the interpretation without
24 any basis simply because he may have gotten a different answer
25 during prep.

1 THE COURT: I don't believe that the interpreter was
2 sworn.

3 MR. KAMARAJU: Well, that may be, your Honor. Maybe I
4 assumed that because that's what I understand the normal
5 practice is. But either way, I don't think that Mr. Horton is
6 entitled to second-guess the interpretation without a basis
7 other than he got a different answer when he asked the question
8 before.

9 THE COURT: So you're stuck with the interpretation
10 unless you have a basis, based upon the language itself, as
11 opposed to expecting a different answer.

12 MR. HORTON: So, your Honor, what I would ask is that
13 the Court exercise its discretion to permit me to ask a
14 different question, which is not the compound question that I
15 think led to the confusion, which is just, if you had known
16 that you wouldn't get GTV stock, which is a fact in evidence,
17 would you have invested, and that is almost word for word the
18 hypotheticals that we put in our motions *in limine* for
19 hypotheticals to be posed to victims, just—it's a different
20 question. It strips out the compound nature of the first one.
21 And just ask it once and move on.

22 MR. KAMARAJU: It's the same question, just stripping
23 out a detail. It's not—the substance of the question is the
24 same. He's merely trying to strip out a detail to make it
25 sound like it's a different substantive question, your Honor,

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1 which is the same thing your Honor sustained on
2 cross-examination before.

3 THE COURT: I'll think about it. We'll come back at
4 noon.

5 MR. HORTON: Thank you, your Honor.

6 (Luncheon recess)

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1 A F T E R N O O N S E S S I O N

2 12:00 P.M.

3 THE COURT: My ruling is that you cannot ask the
4 proposed question.

5 Would you bring the jurors in.

6 (Jury present)

7 THE COURT: Please be seated.

8 Remember that you're still under oath.

9 You may continue your inquiry.

10 MR. HORTON: Thank you, your Honor.

11 Ms. Loftus, could you please pull up for the witness
12 what's marked as Government Exhibit 191. And this document is
13 in evidence, your Honor.

14 Could you please publish it for the jury, Ms. Loftus.

15 THE COURT: I don't believe the jurors have had the
16 benefit of hearing that it's been admitted.

17 MR. HORTON: I was going to ask her a few questions
18 about it.

19 THE COURT: Oh, you plan to continue your inquiry. Go
20 ahead.

21 MR. HORTON: Yes, a few questions about the document.

22 Thank you, your Honor.

23 MR. HORTON: Ms. Loftus has published Government
24 Exhibit VI-191, which is in evidence.

25 BY MR. HORTON:

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1 Q. Ms. Li, what is this document?

2 A. So this is the live streaming of Miles Guo that he said he
3 will donate \$100 million and \$1 million from his family fund.

4 Q. And the document says YouTube on it. Whose YouTube account
5 is this?

6 MR. SCHIRICK: Objection.

7 THE COURT: Excuse me?

8 MR. HORTON: The question was whose YouTube account is
9 shown on this document?

10 THE COURT: You may answer.

11 A. Miles Guo.

12 Q. And Ms. Li, what on here indicates that this is Miles Guo's
13 YouTube account?

14 A. So there is the button indicated, and there was his
15 headshot on the right.

16 Q. Ms. Li, to the right of the image you're describing, it
17 says 451K subscribers. What does that mean?

18 A. This is the -- his supporter that who register.

19 Q. And Ms. Li, did you watch Miles Guo's videos on YouTube?

20 A. Yes.

21 MR. HORTON: Ms. Loftus, can you please show what's in
22 evidence as GX 192, and publish it for the jury, please.

23 THE COURT: All right. Just to be clear, did you have
24 any further authentication questions?

25 MR. HORTON: Not authentication questions, your Honor.

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1 THE COURT: So you're asking that the video be
2 admitted?

3 MR. HORTON: I believe your Honor admitted 191 and 192
4 before the break.

5 THE COURT: For the benefit of the jury, it is
6 admitted.

7 MR. HORTON: Thank you, your Honor.

8 Ms. Loftus, can you play a portion of video at --

9 (Video played)

10 MR. HORTON: Thank you, Ms. Loftus. You can stop
11 there.

12 Q. Ms. Li, did you watch this video before?

13 A. Yes.

14 Q. And what effect, if any, did watching this video have on
15 your decision to donate to Rule of Law?

16 A. So it facilitating to donate money. He said the family
17 fund is \$1 billion, and he already donate \$100 million.

18 MR. HORTON: Your Honor, can I have one moment,
19 please?

20 THE COURT: You may.

21 (Counsel conferred)

22 MR. HORTON: Thank you, your Honor.

23 Ms. Loftus, you can please take this exhibit down.

24 THE COURT: You mentioned 191. Is that 191?

25 MR. HORTON: So 191 was the screen grab of YouTube.

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1 THE COURT: Yes.

2 MR. HORTON: And this is 192, which is the video.

3 THE COURT: Is the actual video.

4 MR. HORTON: Yes.

5 THE COURT: Understood.

6 So they are both admitted.

7 MR. HORTON: They are, your Honor.

8 THE COURT: Go ahead.

9 BY MR. HORTON:

10 Q. Ms. Li, I'm going to shift gears.

11 Who is Lu Jiamei?

12 A. Her internet name is Doudou.

13 THE INTERPRETER: The interpreter would like to
14 verify.

15 A. So she was also one of the member of Guo Media.

16 Q. And what year did you first hear about Lu Jiamei?

17 A. 2020.

18 Q. And what did you first hear about Lu Jiamei

19 A. So it was about that Lu Jiamei invested \$40,000 into Guo
20 Media and she ask for a refund.

21 THE COURT: One moment, please.

22 Counsel, please step up.

23 (Continued on next page)

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Jenny Li - Direct

1 (At sidebar)

2 THE COURT: So I was just made aware that Rule 604
3 requires an interpreter to take an oath, and I don't have any
4 oath on record; and so it is appropriate that she take the
5 oath. But the question is whether or not the defense will
6 challenge whatever she interpreted before taking the oath.

7 MR. KAMARAJU: Can I have just one minute to consult
8 with Ms. Shroff?

9 (Counsel conferred)

10 MR. KAMARAJU: I think obviously our struggle, your
11 Honor, is since we don't speak the language, it's a little hard
12 for us to know whether we think she's been interpreting
13 properly. Could I have one minute to just consult with my
14 client to see if he has any -- he hasn't raised an issue, but I
15 just want to make sure that he hasn't raised an issue with the
16 interpretation --

17 THE COURT: Of course.

18 MR. KAMARAJU: -- which might inform us.

19 MS. SHROFF: I just need to talk to him.

20 (Counsel conferred)

21 (Counsel conferred with defendant)

22 MR. KAMARAJU: Thank you, your Honor.

23 Just making sure nothing has changed in the interim.

24 (Pause)

25 MR. KAMARAJU: If your Honor wants to swear in the

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1 interpreter now, the defense isn't going to challenge the
2 previous testimony. Mr. Guo says he understood it.

3 THE COURT: So I am sorry for the error.

4 MR. KAMARAJU: I should have caught it too, your
5 Honor.

6 THE COURT: I did exclusively trial work, every single
7 day trial work in the state court, where there is not that
8 requirement. And so it did not occur to me. It has never been
9 raised to me during my eleven years here. So I wasn't aware of
10 the rule. And yes, she should be sworn now.

11 MR. KAMARAJU: Does your Honor intend to do that -- I
12 might suggest doing it outside the presence of the jury so it
13 doesn't seem strange.

14 THE COURT: Yes. Right.

15 MR. FINKEL: Should we just do it in the side?

16 MR. KAMARAJU: It's up to your Honor.

17 THE COURT: Do you have any objection to my doing it
18 after the witness's testimony is done? Or do you want me to --

19 MR. KAMARAJU: My only concern about that is --

20 MS. SHROFF: We have no objection, your Honor. We
21 don't have an objection, your Honor. And if our client had had
22 difficulty with the translation, we would have raised it with
23 the Court, because that would have been our obligation. So I
24 just don't want there to be any sense that, you know --

25 MR. KAMARAJU: If your Honor wants to do it at the end

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1 of the day -- I don't know if this witness plans to carry over
2 at this rate or --

3 MR. HORTON: No.

4 MS. SHROFF: You know what, your Honor? You can just
5 swear in. We don't need to hear it. If you want to do it at
6 the sidebar, it's perfectly all right with us.

7 THE COURT: All right. So please bring her over then.

8 MR. KAMARAJU: I'm sorry, your Honor, I should have
9 caught it, too. I've done plenty of foreign language trials.

10 MR. FINKEL: The government apologizes as well. We
11 should have caught this, too. We're all just doing our best
12 here.

13 (Interpreter present)

14 THE COURT: Would you please state your name.

15 THE INTERPRETER: Sarah Chiang.

16 THE COURT: What is your preparation as far as being
17 an interpreter?

18 THE INTERPRETER: Preparation?

19 THE COURT: Yes. Your schooling?

20 THE INTERPRETER: Oh, yes. I got my MBA, yes. And I
21 was in professional translation industry for more than 20
22 years.

23 THE COURT: Do you swear or affirm that the
24 translation and interpretation up until now of this witness and
25 going forward of this witness is a true interpretation and

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1 translation of what she has said in Mandarin?

2 THE INTERPRETER: Yeah, to the best of my knowledge.

3 THE COURT: So you are fluent in both Mandarin and
4 English?

5 THE INTERPRETER: Yes.

6 THE COURT: Any questions from counsel?

7 MR. FINKEL: Not from the government.

8 MR. KAMARAJU: Not from us, your Honor.

9 THE COURT: Okay. Thank you.

10 (Continued on next page)

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Jenny Li - Direct

1 (In open court)

2 THE COURT: You may continue.

3 MR. HORTON: Thank you, your Honor.

4 BY MR. HORTON:

5 Q. Ms. Li, in 2020, what, if anything, did Miles Guo say about
6 Lu Jiamei

7 A. So he said Lu Jiamei asked for a refund. She was the agent
8 sent by CCP.

9 Q. And at the time, what did you think about Lu Jiamei

10 A. I believe whatever he said.

11 Q. And when you say "he," who are you referring to?

12 A. Miles Guo.

13 Q. Ms. Li, did you travel to Hawaii in 2020?

14 A. Yes.

15 Q. And why did you travel to Hawaii in 2020?

16 A. To protest at Doudou, Lu Jiamei.

17 Q. And how many other people, if any, went with you to protest
18 Lu Jiamei in Hawaii?

19 A. I don't remember the exact number, but it was about 23 to
20 25 people.

21 Q. And who, if anybody, told that group of people to go
22 protest Lu Jiamei in Hawaii?

23 A. Miles Guo.

24 Q. What did you see at the protests of Lu Jiamei in Hawaii?

25 A. I didn't see anything.

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1 Q. And what happened at the protest of Lu Jiamei in Hawaii?

2 A. So there was some propaganda printout, and also claiming
3 that Lu Jiamei and her husband were Chinese CCP agent.

4 Q. And Ms. Li, when else, if ever, did you go to a protest
5 organized by Miles Guo?

6 MR. SCHIRICK: Objection.

7 THE COURT: Overruled. You may answer.

8 A. Yes.

9 Q. And when else did you go to a protest?

10 A. Texas.

11 Q. How long were you in Texas for the protest?

12 A. Twenty-nine days.

13 Q. And how many people did you go to that Texas protest with?

14 A. So I don't remember the exact number, but what I saw was
15 200 to \$300 -- sorry, 200 to 300 people, they are taking turns.

16 Q. And what, if anything, did you pay for at those protests?

17 A. So I attend the events of my hotel expenses. And also -- I
18 also at the events some expenses for other people.

19 Q. And about how much money did you spend at the protest in
20 Texas in 2020?

21 A. I spend about \$10,000. And I don't have all the receipts,
22 I only have receipt for \$7,000.

23 Q. Ms. Li, turning back to Lu Jiamei, what did you do when you
24 got back from the protests against Lu Jiamei in Hawaii?

25 A. When I was home, I was stay at home. I was very scared.

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Jenny Li - Direct

1 Q. And why were you very scared when you got back from the
2 protests in Hawaii?

3 A. So because she was accused of being CCP's agents after
4 requesting for a refund.

5 Q. And what were you seeking a refund of when you were accused
6 of being a CCP agent?

7 MR. SCHIRICK: Objection. Misstates testimony.

8 THE INTERPRETER: Sorry. Can you say again?

9 THE COURT: One moment. Sustained.

10 MR. HORTON: Thank you, your Honor.

11 Q. When you were scared after the protests, what did you do?

12 A. I stayed at home for two months straight; didn't go out at
13 all.

14 Q. And why did you stay at home for almost two months
15 straight?

16 A. When I came back from Hawaii was December 12, and Wei's
17 farm was dismissed on December 15.

18 Q. Ms. Li, you said Wei's farm? What was Wei's farm?

19 A. So this is the first farm that Miles Guo allowed to -- this
20 is the first one that Guo and Wei, Miles Guo allow to open
21 underneath him.

22 Q. And what, if anything, was the name of Wei's farm?

23 A. To collect money, just to collect money.

24 Q. Ms. Li, did Wei's farm have a name?

25 A. There were two names.

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Jenny Li - Direct

- 1 Q. What were those names?
- 2 A. The first name is called U.S. West Farm.
- 3 Q. And what's the second name?
- 4 A. Phoenix Farm.
- 5 Q. And what, if anything, did you do with those farms, the
6 west coast farm and the Phoenix farm?
- 7 A. They are the same boss.
- 8 Q. And how, if at all, did you participate in that farm?
- 9 A. There's no activities, is only at Discord.
- 10 Q. And what is Discord?
- 11 A. Is also a so-called maybe social media.
- 12 Q. You said Wei's farm. Who is Wei?
- 13 A. Lihong Wei.
- 14 Q. Is Lihong Wei also Sara Wei?
- 15 A. Yes, the same person.
- 16 Q. Ms. Li, what, if anything, was the connection between Sara
17 Wei's farm and Voice of Guo Media?
- 18 A. Same leader. One leader. And two companies.
- 19 Q. Now, Ms. Li, you said that Sara Wei's farm closed in
20 December 2020?
- 21 A. Yes.
- 22 Q. How did you find out that Sara Wei's farm was closing?
- 23 A. So it was announced at the Discord phone that whether --
24 that where everybody gather together.
- 25 Q. And what understanding did you have, if any, about who Sara

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Jenny Li - Direct

1 Wei reported to?

2 A. Sara Wei's boss is Miles Guo.

3 Q. What was your reaction, Ms. Li, to hearing that Sara Wei's
4 farm was closing?

5 A. So before that Guo and Wei allowed her to open the farm and
6 I thought my money is gone.

7 Q. Why did the farm closing make you think your money would be
8 gone?

9 A. I thought Sara would took the money and go away.

10 Q. Did there come a time, Ms. Li, that Miles Guo spoke about
11 the closure of the farm?

12 A. So Miles Guo, he gather other people from the farm, and at
13 the Discord have a private meeting.

14 Q. And were you in that private meeting?

15 A. I was in the meeting. I was there every single day.

16 Q. And what, if anything, did you do while that meeting with
17 Miles Guo was happening?

18 A. I want to hear how he want to deal with this matter.

19 Q. And were you there for the whole meeting?

20 A. Yes.

21 Q. What day was Guo's meeting on Discord about the closure of
22 the farm?

23 A. So he said that meeting was on December 25, 2020, on
24 Christmas Day.

25 Q. Is that the day that --

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Jenny Li - Direct

1 THE COURT: One moment.

2 When you say you had a meeting on Discord, are you
3 talking about a videoconference?

4 THE WITNESS: It was audio.

5 THE COURT: Go ahead.

6 BY MR. HORTON:

7 Q. Ms. Li, how did Guo's meeting, the audio meeting on Discord
8 about the closure of the farm, how did that meeting begin?

9 A. So Guo said in the previous two days, he said he will give
10 us -- say something to us on the date of December 25.

11 Q. And did there come a time in the audio meeting that
12 somebody asked Miles Guo a question?

13 MR. SCHIRICK: Objection.

14 A. Yes.

15 Q. And what was the question that was asked?

16 MR. SCHIRICK: Objection. Hearsay.

17 THE COURT: Overruled. You may answer.

18 Q. Ms. Li, what was the question that was asked of Miles Guo
19 at the Discord meeting?

20 A. So in the first nine minutes of the conference, a dentist
21 from Himalaya asked how he want to handle with this money.

22 Q. And what did you understand that the dentist was asking him
23 for?

24 A. So he asked Miles Guo that he agreed -- he agreed with
25 those monies, but that he asked for the refund.

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Jenny Li - Direct

1 Q. And what did Miles Guo say after the dentist asked for a
2 refund?

3 MR. SCHIRICK: Objection.

4 THE COURT: You may answer.

5 A. He said this person is coming to make the interruption.

6 Q. And what happened next after that, Ms. Li?

7 A. So later he asked Guopin to kick him out.

8 Q. And was the dentist kicked out after asking Miles Guo for a
9 refund?

10 A. Yes.

11 Q. What effect, if any, Ms. Li, did it have on you to hear
12 Miles Guo kick out the dentist after they asked for a refund?

13 A. I also want to ask the same question since I also make an
14 investment in there as well.

15 Q. And did you ask the question in that Discord meeting on
16 Christmas Day?

17 A. After the dentist was kicked out and he was yelling at him,
18 and I don't dare to make a voice.

19 Q. Ms. Li, what records, if any, do you have of this meeting
20 with Miles Guo?

21 A. Yes.

22 MR. HORTON: Your Honor, may I approach?

23 THE COURT: Yes.

24 Q. Ms. Li, I've handed you an item that's been marked
25 Government Exhibit VH-100, which contains Government Exhibits

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Jenny Li - Direct

1 VH-10 and Government Exhibit VH-11.

2 Q. Have you seen this item before, Ms. Li?

3 A. Yes, there has my -- there is my signature with it.

4 Q. And when did you see it?

5 A. This morning.

6 Q. And what are the files that are on that item?

7 A. It shows the entire process where the Himalaya dentist was
8 kicked out. Kick out.

9 Q. And who made those files that are on that drive, Ms. Li?

10 A. Myself.

11 MR. HORTON: Your Honor, Government Exhibits VH-10 and
12 VH-11, we're not offering at this time. They are not yet
13 translated. We do ask that the defense raise any
14 authentication objections to those exhibits now.

15 MR. SCHIRICK: Your Honor, we haven't seen them in
16 court. We haven't seen them shown to the witness to have her
17 authenticate them. We know that the digital files are on the
18 drive, but that's it. So I'm not sure how we could --

19 THE COURT: So you'll step up.

20 (Continued on next page)

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Jenny Li - Direct

1 (At sidebar)

2 THE COURT: Are you asking that they be admitted
3 subject to connection?

4 MR. HORTON: So we had her authenticate them, and she
5 saw what was on the drive, she saw that they -- heard, rather,
6 the audio clips. She testified that she made the audio clips
7 and she knew what they were.

8 And so we wanted to get that in the record and see if
9 the defense had any objections as to authenticity. They are
10 Mandarin audio clips. We're having them translated; they are
11 not translated yet, and so we are not offering them at this
12 time. We just wanted to see if there was an authenticity
13 objection.

14 MR. FINKEL: This is further to what the parties and
15 your Honor discussed this morning before the jury entered.
16 This is the second of two clips that we are just seeking to
17 authenticate with the witness. And then once the parties have
18 time to work through a translation, would then seek to offer
19 it. So we just want to make sure there are no authenticity
20 objections.

21 THE COURT: Are you saying that you want to offer them
22 after the witness has testified?

23 MR. FINKEL: Yeah, later on in the trial either
24 through a stipulation of the parties as to translation or, if
25 necessary, we'll put a translation expert on the stand.

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Jenny Li - Direct

1 THE COURT: So you can ask any authentication
2 questions without having heard the audiotapes.

3 MR. FINKEL: I should note the exhibits have been
4 produced, so they have the exhibits.

5 MR. SCHIRICK: Okay. I'm not sure how the witness can
6 authenticate audio files just by looking at a thumb drive.
7 That's unclear to me, number one.

8 THE COURT: So we can do the same thing that we did
9 the last time, which is to have them played outside the hearing
10 of the jury.

11 MR. HORTON: Your Honor, if I might.

12 I believe I had elicited this, and if I didn't, I'm
13 happy to do it now. I had elicited that she knew what was on
14 the drive because she heard those files. When she heard them
15 on the drive, she recognized them as the clips that she made of
16 this meeting she testified about. And so I think that's
17 sufficient for her to authenticate them.

18 THE COURT: If he's going to raise the authentication
19 objection, I'm going to have you play them for her. The
20 question is just when.

21 MR. KAMARAJU: I think you can do it at the end of her
22 direct. I don't know how much longer you have.

23 MR. HORTON: Not that much longer. Not that much
24 longer.

25 MR. FINKEL: So, your Honor, it's entirely up to you,

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Jenny Li - Direct

1 and I think really more up to the defense. It's Mr. Guo's
2 voice on them. And I think -- I guess what we would propose,
3 subject to your Honor's view, is after the direct we can play
4 them; they can raise any authenticity objections at that point,
5 and then the cross would begin.

6 THE COURT: That's fine. We'll do it that way.

7 MR. FINKEL: Thank you.

8 (Continued on next page)

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Jenny Li - Direct

1 (In open court)

2 THE COURT: You may continue.

3 MR. HORTON: Thank you, your Honor.

4 BY MR. HORTON:

5 Q. Ms. Li, did there come a time that you made your own
6 broadcasts?

7 A. Yes.

8 Q. And what year was that?

9 A. 2021, February 6, 2021.

10 Q. What was the subject of the broadcast you made in
11 February 2021?

12 A. It was talking about that all those leaders underneath
13 Miles Guo, they all liars.

14 Q. And who of the leaders underneath Miles Guo were you
15 talking about?

16 A. Guopin, Liya.

17 Q. Ms. Li, does Liya go by any other names?

18 A. Mulan.

19 Q. And who was Mulan?

20 A. So this is the same person as Liya, two names.

21 Q. And who was Liya?

22 A. So this is the main translator of Miles Guo and company
23 that is also the farm.

24 Q. And what did you understand was Liya's role for Miles Guo?

25 A. So she -- it's the same level as Sara Wei.

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Jenny Li - Direct

1 Q. And what, if anything, did you say about Miles Guo on these
2 broadcasts in February of 2021?

3 MR. SCHIRICK: Objection.

4 THE COURT: Overruled.

5 A. So in the beginning that I said those people I met are
6 offline, they all lying.

7 Q. And Ms. Li, what, if anything, in your broadcasts in
8 February 2021 did you say about Miles Guo?

9 MR. SCHIRICK: Objection. Asked and answered.

10 THE COURT: Sustained.

11 Q. Did there come a time, Ms. Li, that you communicated
12 directly with Miles Guo?

13 A. No.

14 Q. When you were a follower of Miles Guo, Ms. Li, did you use
15 WhatsApp?

16 A. Yes.

17 Q. Did you ever get or send a message to Miles Guo on
18 WhatsApp?

19 A. It was when the farm was dismissed in December, that was
20 the first time I send him a message.

21 Q. And what did you communicate to him in those WhatsApp
22 messages?

23 A. So I communicate with him regarding the matter that offline
24 leaders was -- had some problem, and that this person is the
25 liar.

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1 Q. And in those communications with Miles Guo, Ms. Li, what,
2 if anything, did you ask him for?

3 A. He just ignore me.

4 Q. What, if anything, did you ask Miles Guo for in those
5 communications, Ms. Li?

6 MR. SCHIRICK: Objection. Asked and answered.

7 THE COURT: Sustained.

8 Q. Ms. Li, what's H Coin?

9 A. So HB is also known as G Coin. It is the first letter from
10 Guo, G-U-O.

11 Q. And did there come a time that somebody asked you to buy G
12 Coin or H Coin?

13 A. Many people.

14 Q. And what year were you asked to buy G Coin or H Coin?

15 MR. SCHIRICK: Objection. Compound.

16 THE COURT: Sustained.

17 Q. What, if anything, Ms. Li, did you understand was the
18 relationship between G Coin and H Coin?

19 A. It is the same thing, and but later on changed to H Coin.

20 Q. And did you ultimately send money to somebody for H Coin?

21 A. Yes.

22 Q. And who did you send that money to for H Coin?

23 A. Yongbing Zhang.

24 Q. And who is Yongbing Zhang?

25 A. He is the farm owner of the Washington, D.C. farm.

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Jenny Li - Direct

1 Q. And what, if anything, did you understand was the
2 relationship between the owner of the D.C. farm and Miles Guo?

3 A. They are together.

4 Q. How much money did you send to the D.C. farm leader for H
5 Coin?

6 A. A total amount is \$5,700, plus \$30 of a wire transfer fee.

7 Q. And when was that, Ms. Li?

8 MR. SCHIRICK: Asked and answered.

9 THE COURT: Overruled. You may answer.

10 A. 2021.

11 Q. And why did you agree to send \$5,000 to the D.C. farm
12 leader for H Coin?

13 A. So after my live streaming and I got a lot of pressure, and
14 so a lot of people pressured me to purchase it.

15 Q. Ms. Li, do you use Twitter?

16 A. Yes.

17 Q. Did there come a time that you posted about Miles Guo on
18 Twitter?

19 A. Yes.

20 Q. And when did you first post about Miles Guo on Twitter?

21 A. It was on July 15, 2021, that was my first time.

22 Q. And what did you post?

23 A. I don't recall now.

24 Q. What was the subject that you were posting about?

25 A. This person is a liar.

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Jenny Li - Direct

1 Q. And why did you post that Miles Guo was a liar in
2 July 2021?

3 A. So it was when the dentist asked for refund and he got kick
4 out.

5 Q. And you said that was in December 2020, Ms. Li? Why did
6 you post about it in July 2021?

7 A. Because I have a live streaming GTV for 41 or 42 days, I
8 don't recall exactly.

9 Q. And what's the connection between your live streaming on
10 GTV and why you tweeted about Miles Guo being a liar in 2021?

11 A. Because GTV is Guo's, Miles Guo's media. I don't dare to
12 say something bad about him on there.

13 Q. And what, if anything, changed in July 2021, where you
14 dared to say something?

15 A. So either July 10 or July 11 of 2020, Miles Guo and the
16 Lude, also known as Won Tin Gong, they have a fight over it.

17 Q. What do you mean they had a fight over it?

18 A. Lude, he used to live at Guo and Grace place in New York.

19 Q. Ms. Li, since the July 2021 tweet you mentioned, how often,
20 if ever, have you posted about Miles Guo?

21 A. I have always been doing that since then.

22 Q. And what message, if any, have you intended to convey
23 through those posts about Miles Guo since 2021?

24 A. So I want to tell many people and also people who climb the
25 wall from China, don't keep putting money in here. This is

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Jenny Li - Direct

1 organized Mafia.

2 Q. And when you say you want to tell people don't keep putting
3 money in here, where do you not want them to keep putting their
4 money?

5 A. The farms.

6 Q. And who do you understand controls the farms?

7 MR. SCHIRICK: Objection. Asked and answered.

8 THE COURT: Overruled. You may answer.

9 A. There are many farms underneath it.

10 Q. And who do you understand, Ms. Li, if anybody, the farms
11 ultimately report to?

12 MR. SCHIRICK: Objection. Asked and answered.

13 THE COURT: Sustained.

14 Q. Have you followed this trial in the news, Ms. Li?

15 A. Always.

16 Q. And why have you been following this in the news?

17 A. So I want to see if a liar will be committed or charge.

18 Q. And who is the liar you're referring to, Ms. Li?

19 A. So Miles Guo, and also the farmers underneath him. And
20 they collect the money, they are like a marketing layer,
21 marketing schemes, and they are Mafia.

22 Q. Ms. Li, I want to talk about the \$20,000 you first invested
23 in GTV. When, if ever, was any of that money refunded to you?

24 A. So the money was refunded to me in November of 2023 through
25 ICBC -- ICEC -- SEC. Sorry.

064VGUO3

Jenny Li - Direct

1 Q. And how much of your \$20,000 that you first invested in GTV
2 did you get back from the SEC?

3 A. I only -- it was 7.2 or 7.8 percent less.

4 Q. And Ms. Li, the \$60,500 you invested in farm loans for GTV
5 stock, did you get any GTV stock for that investment?

6 THE INTERPRETER: Sorry, is it 6,000?

7 MR. HORTON: 60,500.

8 A. No.

9 Q. What, if anything, did you get for that \$60,500, Ms. Li?

10 A. I didn't get anything.

11 Q. Ms. Li, for the \$20,000 you invested in G Clubs, how much,
12 if any, GTV stock did you get for that?

13 A. Nothing.

14 Q. And what, if anything, did you get for the \$20,000 you
15 spent on G Clubs?

16 A. So in the new year of 2022, I receive a white box that
17 looks very cheap. And so inside I think there was a cup and
18 also some cookies, but I throw it away.

19 Q. Is that the only thing you got from G Clubs, Ms. Li?

20 A. Yes.

21 Q. Ms. Li, if you had known that you would not get any GTV
22 stock, would you have given money to Miles Guo?

23 MR. SCHIRICK: Objection, your Honor.

24 THE COURT: Sustained.

25 Q. Ms. Li, when you were a follower of Miles Guo, what, if

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Jenny Li - Direct

1 anything, did he say about what the CCP was doing to him?

2 A. So I don't really take his word seriously, but I hope China
3 can be like United States to be a free and democrat country and
4 be a country with rule of law.

5 Q. And Ms. Li, when you were a follower of his, did you hear
6 Miles Guo say anything about what the CCP was doing to him?

7 MR. SCHIRICK: Asked and answered.

8 THE COURT: Sustained.

9 MR. HORTON: Can I have one moment, your Honor?

10 THE COURT: Yes.

11 (Counsel conferred)

12 Q. Ms. Li, what is the total amount of money you invested to
13 try to get GTV stock?

14 A. \$100,500.

15 Q. And that \$100,000, where did you get it from?

16 A. So I got -- \$10,000 I got from my home. But for rest of
17 the money, I use the mortgage -- second mortgage for my home.

18 Q. And Ms. Li, other than the part that was refunded by the
19 SEC, how much of that money do you have today?

20 A. I don't understand the question.

21 Q. Other than what -- other than the refund you got from the
22 SEC, how much of the \$100,000 you invested for GTV stock do you
23 have today?

24 MR. SCHIRICK: Asked and answered.

25 THE COURT: You may answer.

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Jenny Li - Direct

1 THE INTERPRETER: Excuse me, I need to clarify.

2 A. So I didn't get anything back other than that I told
3 Yongbing Zhang that I want the money back for \$5,700.

4 Q. And Ms. Li, the money of yours that you didn't get back,
5 where do you understand it is today?

6 A. Miles Guo stole my money.

7 MR. HORTON: Thank you, your Honor.

8 No further questions subject to what was discussed
9 previously at sidebar.

10 THE COURT: Members of the jury, we're going to take a
11 brief pause at this time. Again, don't discuss the case.

12 (Jury not present)

13 THE COURT: All righty. So you can go ahead and ask
14 the foundational questions of the witness.

15 MR. HORTON: Thank you, your Honor.

16 Ms. Loftus, if you can please pull up Government
17 Exhibit VH-10. And with the audio on, if you could please play
18 it.

19 (Audio played)

20 Q. Ms. Li, what was that clip?

21 A. So this is on December 25, 2020, on the Discord platform
22 that the dentist Himalaya asked for refund.

23 MR. HORTON: And Ms. Loftus, can you please play
24 VH-11.

25 (Audio played)

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Jenny Li - Direct

1 Q. Ms. Li, what is that a recording of?

2 A. So on the first half it was the Himalaya ask for refund.
3 The second half was Ms. -- Mr. Guo, he was asking people if
4 you ask refund again, you will be kicked out.

5 Q. And whose voices are heard on the clips?

6 THE INTERPRETER: Say that again?

7 Q. I'm sorry, whose voices are heard on the clips?

8 A. So the person who was on the other voice is Guopin that
9 saying kick it out. And the other person is Miles Guo's voice.

10 Q. Miles Guo's voice is on that recording?

11 A. Yes.

12 Q. Is Miles Guo's voice on both the two recordings we just
13 played, VH-10 and VH-11?

14 A. Yes, both had Miles Guo's voice.

15 THE COURT: What is the name of the dentist that you
16 said was kicked out?

17 THE WITNESS: So I don't exactly know her name is, but
18 all the investors and also leaders online, they all use the
19 online name.

20 THE COURT: Go ahead.

21 THE WITNESS: So Guo -- Miles Guo and also the owner
22 of the farmers, they all know the names of investors.

23 BY MR. HORTON:

24 Q. Ms. Li, the dentist you said is on that recording, what
25 name, if any, did she call herself?

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Jenny Li - Direct

1 A. Himalaya.

2 MR. HORTON: Your Honor, at this point we'd ask if the
3 defense has any objection as to authenticity.

4 THE COURT: Mr. Schirick.

5 MR. SCHIRICK: No objection to authenticity, your
6 Honor.

7 THE COURT: How did you make the recordings?

8 THE WITNESS: Yes.

9 THE COURT: My question is how did you make the
10 recordings?

11 THE WITNESS: I use my cell phone.

12 THE COURT: All right. So those recordings are
13 admitted. But we need to indicate to the jury when the jury is
14 present that they are admitted.

15 MR. SCHIRICK: I believe all that was at issue is
16 authentication, your Honor, for now. And then the government
17 indicated that they may later try to move them in through a
18 different witness.

19 THE COURT: So you're not seeking to admit them?

20 MR. HORTON: So, your Honor, at this moment with the
21 witness here, we wanted to address authenticity. The
22 recordings include the defendant's statements, so they include
23 party admissions. For the convenience of the Court and the
24 parties, what we're doing is getting them translated and we're
25 going to --

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Jenny Li - Direct

1 THE COURT: Oh, yes, I forgot about the translation.

2 Okay. So as far as the foundation, I find that it is
3 adequate and the defense is not challenging it. But we are
4 awaiting the translation for -- before you move them into
5 admission.

6 Okay. So let's get the jurors back, please.

7 (Continued on next page)

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1 (Jury present)

2 THE COURT: Please be seated.

3 Cross-examination?

4 MS. SHROFF: May we have a moment at sidebar?

5 THE COURT: Yes, you may.

6 MS. SHROFF: Thank you.

7 (At the sidebar)

8 MS. SHROFF: Your Honor, I originally noticed somebody
9 speaking to the government at the table. I wasn't quite sure
10 who the person was. But I am reminded by my co-counsel that
11 the person on the left side that was talking to the government,
12 I think she is—her name is Stephanie, she's an interpreter
13 with whom we've had colossal trouble with, and we stopped using
14 her at the MDC.

15 MR. KAMARAJU: We don't know if she was called by the
16 Court or—

17 MR. FINKEL: Your Honor asked that we get another
18 interpreter. That's who we were able to get. I didn't know
19 anything about her. If you don't want to use her, that's fine
20 with us. I think this has been going okay in terms of
21 efficiency, and we're happy to proceed however the Court would
22 like to. Apparently this interpreter is not—

23 MR. KAMARAJU: We just had her previously interpret
24 for us at the jail. We had to stop using her because, whether
25 it's a dialogue—dialect or whatever it is, they just don't

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Li - Cross

1 understand each other.

2 THE COURT: All right. So we will not be using her.

3 MS. SHROFF: We just didn't want to start and—

4 THE COURT: Understood.

5 MR. FINKEL: Thank you, your Honor.

6 (Continued on next page)

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Li - Cross

1 (In open court)

2 CROSS EXAMINATION

3 BY MR. SCHIRICK:

4 Q. Good afternoon, Ms. Li.

5 A. Good afternoon.

6 Q. Now you testified on direct that you've been following this
7 trial closely, right?

8 A. I used to.

9 Q. And you've been following the testimony of other witnesses
10 at this trial?

11 A. I didn't have so much time to watch everything.

12 Q. Well, my question was, have you followed the testimony of
13 other witnesses, not if she's followed everything.

14 MR. HORTON: Objection. Asked and answered.

15 THE COURT: What's good for the goose.

16 Q. How else have you been following this trial, Ms. Li?

17 A. I just look at the progress, nothing else.

18 Q. And what sources are you consulting to check on the
19 progress?

20 A. Twitter.

21 Q. And what Twitter accounts in particular?

22 A. I forgot about my account.

23 Q. You forgot about the account that you were following?

24 A. Oh, no. I want to—can you please clarify your question,
25 please.

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Li - Cross

1 Q. Sure. My question is: What Twitter accounts have you been
2 following?

3 A. Some government account and also journalists' accounts.

4 Q. What journalists' accounts have you been following on
5 Twitter?

6 A. There are two journalists, but I forgot the name. One's
7 called Nation something.

8 Q. Are they with newspaper outlets?

9 A. No.

10 Q. Online website?

11 A. Can I ask you a question?

12 THE COURT: No. You can only answer.

13 A. I don't know what you mean.

14 Q. Have any of the Twitter accounts you've been following been
15 associated with online publications?

16 A. No.

17 Q. What government accounts on Twitter have you been
18 following?

19 A. All the accounts that I report to that I follow them.

20 Q. Can you be more specific.

21 MR. HORTON: Objection. Asked and answered.

22 THE COURT: You may answer.

23 A. FBI, Department of Justice, SEC, Homeland Security bureau.

24 Q. Your testimony is that the Homeland Security bureau is
25 posting about this trial on its Twitter account?

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Li - Cross

1 MR. HORTON: Objection. Asked and answered.

2 THE COURT: Sustained.

3 Q. Have you spoken to anyone who has attended trial, apart
4 from the government lawyers?

5 A. Which trial?

6 Q. The one that we're in now.

7 A. Yes.

8 Q. Who have you spoken to?

9 A. I don't know this person's name.

10 Q. How did this person contact you?

11 A. It was my—from my reported letter, FBI contact me.

12 Q. So is it your testimony that the FBI agent who contacted
13 you has been telling you what's happening at trial?

14 MR. HORTON: Objection.

15 THE COURT: Sustained.

16 MR. SCHIRICK: It's a clarification question, your
17 Honor. It's taken three questions to get here.

18 THE COURT: There have been many efforts of
19 clarification questions.

20 MR. SCHIRICK: Thank you, your Honor.

21 BY MR. SCHIRICK:

22 Q. Did the FBI agent you spoke to tell you about anyone who
23 testified yesterday?

24 A. No.

25 Q. Did the FBI agent that you've spoken to tell you about any

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Li - Cross

1 other specific witness's testimony?

2 A. No.

3 Q. Other than the FBI agent you just referred to, has anyone
4 else told you about witness testimony at this trial?

5 MR. HORTON: Objection. Asked and answered.

6 THE COURT: Sustained.

7 Q. Have you been following the NFSC's Twitter account of this
8 trial?

9 A. Can you please explain what it is. What is the full name?

10 Q. The New Federal State of China.

11 A. When?

12 Q. My question is: Have you followed the New Federal State of
13 China's Twitter posts?

14 A. No.

15 Q. Have you reviewed any of the transcripts of this trial?

16 A. I don't read too much English.

17 Q. Has anyone reported to you on their review of the
18 transcripts of this trial?

19 MR. HORTON: Objection. Asked and answered.

20 THE COURT: I'll allow the question.

21 A. No.

22 Q. Have the government lawyers been updating you on any of the
23 substance of this trial?

24 A. Which lawyer?

25 Q. Any of them.

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Li - Cross

1 A. I don't know. I thought they are from the government.

2 MR. SCHIRICK: I think we may have lost audio, your
3 Honor.

4 THE COURT: If you'll just repeat the answer.

5 THE INTERPRETER: "I don't know. I thought they are
6 from the government."

7 MR. SCHIRICK: I'm sorry. Could I just have the
8 interpreter repeat it one more time.

9 THE INTERPRETER: "I don't know. I thought they are
10 from the government."

11 BY MR. SCHIRICK:

12 Q. Can you point to at counsel's table who you believe is from
13 the government.

14 A. These three. I met with them before.

15 Q. Okay. Have any of those people that you identified told
16 you anything about the substance of this trial up until today?

17 A. No.

18 Q. Okay. Now you've met with the government's lawyers in this
19 case eight times to prepare for your testimony today, correct?

20 A. Yes.

21 Q. Eight times plus again this morning, correct?

22 A. I don't remember exactly how many times, but we—on the
23 video call was maybe two or three times.

24 Q. Okay. And when you met with them, you provided information
25 to them, correct?

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Li - Cross

1 A. Yes.

2 Q. Okay. And when you met with them, they told you that you
3 had to tell them the truth, correct?

4 A. Yes.

5 Q. And you did, right?

6 A. All I'm saying here is that I was cheated. That's all my
7 experience.

8 MR. SCHIRICK: Move to strike as nonresponsive, your
9 Honor.

10 MR. HORTON: Objection, your Honor.

11 THE COURT: Sustained. The answer is stricken.

12 Q. When you met with the government lawyers before today, you
13 told them the truth, correct?

14 A. All I'm saying is true.

15 Q. Okay. Ms. Li, you moved to the United States about 20
16 years ago, right?

17 A. Yes.

18 Q. And you testified on direct that you encountered Mr. Guo on
19 social media around 2017, right?

20 A. Yes.

21 Q. And that was on YouTube, correct?

22 A. In the beginning, also on YouTube.

23 Q. Okay. And I believe you testified on direct that you first
24 heard of Mr. Guo when he did an interview with Voice of
25 America, right?

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Li - Cross

1 A. Yes.

2 Q. That interview was in April of 2017?

3 A. April 19.

4 Q. Thank you. But you first heard about the video in July of
5 2017; is that right?

6 A. No.

7 Q. When did you first hear about the Voice of America video?

8 A. It is April 19, 2017. You just said only 2017.

9 Q. Ms. Li, you were initially skeptical of Mr. Guo; is that
10 correct?

11 A. I didn't have feeling whatsoever.

12 Q. Didn't you tell the government that you thought that
13 wealthy, rich people in China must be related to the Chinese
14 government?

15 A. I didn't say that.

16 Q. Now did a point in time come when you joined a Discord
17 group to connect with the movement after seeing the Voice of
18 America interview?

19 A. Yes.

20 Q. Okay. And you testified on direct that you donated \$6,000
21 to the Rule of Law Foundation; is that correct?

22 A. I don't recall the exact number, but I have receipts.

23 Q. Well, you donated—you donated money to the Rule of Law
24 Foundation, correct?

25 A. Yes, I donated money to Rule of Law Foundation.

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Li - Cross

1 Q. And was it, in your view, a substantial amount of money?

2 A. Of course. That's a big—big amount.

3 Q. And in fact, did you tell the government that it was a
4 financial hardship to donate that amount of money?

5 A. This is not a one-time donation. I didn't say that.

6 Q. So let's talk about the total.

7 MR. HORTON: Is there a question pending?

8 THE COURT: Is there a question?

9 MR. SCHIRICK: I thought there was. But the question
10 is: With respect to the total amount of money that was donated
11 to the Rule of Law Foundation, what did—did the witness tell
12 the government that that was a financial hardship to donate
13 that amount.

14 MR. HORTON: Objection, form.

15 THE COURT: Sustained.

16 BY MR. SCHIRICK:

17 Q. Ms. Li, what's your best estimate of how much you donated
18 in total to the Rule of Law Foundation?

19 A. About 6,000.

20 Q. So if you—if we assume it was \$6,000 that you donated, was
21 that—would you consider that a financial hardship to donate
22 that amount of money?

23 MR. HORTON: Objection, your Honor.

24 THE COURT: I'm going to allow the question.

25 A. So sorry. I just said earlier, this is—this is not the

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Li - Cross

1 only donation that I—I put into.

2 THE COURT: You got your answer.

3 Q. Was there more than \$6,000?

4 MR. HORTON: Objection, your Honor.

5 THE COURT: Sustained. Don't answer.

6 Q. Ms. Li, did you tell the government that your donation to
7 the Rule of Law Foundation was a financial hardship?

8 MR. HORTON: Objection, your Honor. Asked and
9 answered.

10 THE COURT: Sustained. Asked and answered. Don't ask
11 again.

12 Q. Now isn't it true that you were motivated to donate to the
13 Rule of Law Foundation in part because of the protests in Hong
14 Kong?

15 A. Yes.

16 Q. And you told the government that the students reminded you
17 of your child?

18 A. Yes.

19 Q. And when the government lawyer asked you what your
20 motivation for donating to the Rule of Law was on direct, you
21 didn't identify those motivations, did you?

22 A. Can you please explain.

23 Q. Government lawyer asked you earlier today what your
24 motivation was for donating to the Rule of Law Foundation,
25 right?

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Li - Cross

1 A. So it's not a motivation. It was push by Miles Guo that
2 because he said he is going to donate \$100 million and his
3 family is going to donate \$1 billion to help, I want to donate
4 money as well to help those children in Hong Kong.

5 Q. I understand that that's the answer you gave earlier today.

6 MR. HORTON: Objection, your Honor.

7 Q. And my question now is—

8 THE COURT: Overruled.

9 Q. —why, when you answered earlier today, you didn't identify
10 these other motivations that we just talked about.

11 A. What is the motivation?

12 Q. Happy to have the court reporter read it back. But I
13 believe you testified that part of your motivation was—

14 THE COURT: Perhaps it's the language that you're
15 using, counsel. Perhaps you might try a different word.

16 Q. One of the reasons that you donated to the Rule of Law
17 Foundation was because of the protests in Hong Kong and the
18 fact that the protesting students reminded you of your child,
19 correct?

20 MR. HORTON: Objection to form.

21 THE COURT: Overruled. You may answer.

22 A. Not exactly.

23 Q. So you're changing your answer from earlier?

24 MR. HORTON: Objection.

25 THE COURT: Overruled. You may answer.

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Li - Cross

1 A. I don't understand what you're talking about.

2 Q. Are you having any trouble with the interpreter, ma'am?

3 A. I understand her, but please try to explain.

4 MR. SCHIRICK: I'll move on, your Honor.

5 Q. Ms. Li, I'd like to talk about your investment in GTV,
6 okay?

7 A. Yes.

8 Q. You heard about the opportunity to invest in GTV from Lude
9 Media, right?

10 A. I also saw it from Miles Guo.

11 MR. SCHIRICK: Your Honor, can we direct the witness
12 to answer the question, please.

13 MR. HORTON: Object to that, your Honor. She did
14 answer the question.

15 THE COURT: So try to limit your answer to the
16 question that is being asked. So for example, if the question
17 is "What is your favorite color?" and you answer "My favorite
18 color is blue," you don't then say, "My favorite dessert is ice
19 cream." Just stick to the question.

20 BY MR. SCHIRICK:

21 Q. So you first heard about the opportunity to invest in GTV
22 from a Lude Media broadcast online, right?

23 A. No.

24 Q. What is Lude Media?

25 A. So it is the earliest media that doing propaganda for Miles

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Li - Cross

1 Guo, so it's his self-media.

2 MR. SCHIRICK: Your Honor, it's the same issue. It's
3 a nonresponsive answer.

4 MR. HORTON: Object to that, your Honor.

5 THE COURT: You'll step up.

6 (Continued on next page)

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O641GU04

Li - Cross

1 (At the sidebar)

2 THE COURT: I don't know if she has a limitation as
3 far as understanding questions, or if she simply is resisting
4 questions. This is the witness. She has her way of answering.
5 And I have tried to get her to answer questions clearly, but I
6 don't know how far you can get with her.

7 Is there some instruction that you want me to give,
8 sir?

9 MR. SCHIRICK: Your Honor, I think if the witness
10 continues to give nonresponsive answers, I would ask the Court
11 to continue to give the instruction that she directly answer
12 questions. I think we've all heard that she either—for
13 perhaps either reason your Honor has articulated, whatever it
14 is, we're not getting responsive answers to the questions. She
15 had no problem with Mr. Horton on direct, but we're now having
16 all kinds of trouble on cross.

17 MR. HORTON: Well—

18 THE COURT: My goodness. I think she's rather
19 consistent.

20 MR. HORTON: If I could be heard.

21 MR. KAMARAJU: I just have one--another option that
22 your Honor has already employed is that we may ask again to
23 move to strike testimony again if it's nonresponsive. Just
24 flagging that as another possibility.

25 THE COURT: Of course. That would perhaps refer to

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Li - Cross

1 2/3 of her testimony.

2 MR. KAMARAJU: Okay, your Honor. She's not my
3 witness.

4 MR. HORTON: Your Honor did—for the record, the last
5 question answered, the last answer was responsive to
6 Mr. Schirick's question. He may not have liked the color that
7 she added, but the color was—her answer included her view on
8 his relationship with Miles Guo. That's a responsive answer,
9 even if it's not a favorable one.

10 MS. SHROFF: The added color is what makes it
11 nonresponsive.

12 MR. HORTON: The witness is not obligated to give you
13 a terse answer. She can say what the question calls for in her
14 mind that was responsive. Who is this person? That's a fair
15 response. That's a responsive answer.

16 THE COURT: So do you have an application?

17 MS. SHROFF: I think we'll move to strike the last
18 answer and we'll just see how it goes going forward, your
19 Honor.

20 THE COURT: So I just want to go back and review the
21 transcript to see whether I'm going to strike it or not.

22 MR. SCHIRICK: Thank you.

23 (Pause)

24 THE COURT: A member of my staff tells me that they
25 heard Juror No. 4 state that the interpreter has made some

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Li - Cross

1 errors but they're not significant.

2 MS. SHROFF: Your Honor, our client did point out that
3 the interpreter had made some errors as well, but since in our
4 judgment the errors didn't—weren't significant, so to speak,
5 we didn't interrupt the proceedings. So—it's not
6 inconsistent.

7 THE COURT: I just wanted this to be on the record in
8 case anyone had something to say about it.

9 MR. KAMARAJU: I'm just curious, your Honor, and maybe
10 we have to ask, and don't know the answer to this, but did the
11 juror say this to another juror member?

12 THE COURT: No. The juror made the comment to a
13 member of my staff.

14 MR. KAMARAJU: Oh, okay. Understood. Understood.

15 MR. FINKEL: Your Honor, I think your Honor instructed
16 the jurors during voir dire that they are to use only the
17 translator, so we believe that has been addressed and there's
18 nothing further.

19 MR. KAMARAJU: We're fine, your Honor.

20 MS. SHROFF: We don't need another instruction, your
21 Honor. It's fine.

22 MR. KAMARAJU: Obviously we can take it up again if
23 there's an issue, but we're fine right now.

24 THE COURT: Okay.

25

0641GUO4

Li - Cross

1 (In open court)

2 THE COURT: So the objection is sustained.

3 I want to remind the witness that if you're asked a
4 specific question, you must only answer that specific question.

5 THE WITNESS: Yes.

6 THE COURT: So if the attorney asks you "What day of
7 the week was yesterday?" and let us say your answer is
8 "Yesterday was Monday," you cannot add, "It was a sunny day" or
9 that it was raining. You must stick to the question.

10 Go ahead.

11 MR. SCHIRICK: And your Honor, the motion to strike?

12 THE COURT: The answer is stricken.

13 MR. SCHIRICK: Thank you, Judge.

14 BY MR. SCHIRICK:

15 Q. You first learned about the potential GTV investment in
16 April of 2020, right?

17 A. Yes.

18 Q. And I believe you testified on direct examination that you
19 watched Mr. Guo's videos all the time, right?

20 A. Yes.

21 Q. Okay. You said five to six days a week, I believe,
22 correct?

23 A. Yes.

24 Q. And you heard Mr. Guo talk about the GTV private placement
25 before you invested, right?

0641GU04

Li - Cross

1 A. Yes.

2 Q. Okay. Now I'm going to ask you about who you communicated
3 with directly, and what I mean by directly is one to one, okay?

4 A. Can you please explain.

5 Q. Directly means, in the way that I'm using it, to have a
6 direct conversation, a first-person conversation or
7 communication. Does that make sense?

8 A. You mean about investment?

9 Q. Generally. So when I say directly, I am excluding from my
10 question anything that you—anything that didn't include the
11 person you were communicating with in the one-on-one. Does
12 that make sense?

13 THE COURT: So are you saying that you want her to
14 exclude any group conversation?

15 MR. SCHIRICK: No, your Honor. Let's try it this way.

16 Q. You never spoke with Mr. Guo directly about your investment
17 before you made it, right?

18 A. Yes.

19 Q. You communicated with Sara Wei, correct?

20 A. About investment?

21 Q. Investment in GTV, yes.

22 A. Yes.

23 Q. Okay. And Sara Wei was with VOG, correct?

24 A. Yes.

25 Q. And she was a farm leader of the Phoenix farm, right?

0641GU04

Li - Cross

1 A. Yes.

2 Q. And you got all of your instructions for investing in GTV
3 from Sara Wei, right?

4 A. No.

5 MR. SCHIRICK: Can we please pull up what's in
6 evidence as VH7.

7 Q. Do you remember this document, Ms. Li?

8 A. This is the money, the check for the investment.

9 Q. What's the date of this check?

10 A. It is written April 12, but it was—it was wrong. It
11 should be May 12.

12 Q. Okay. But it says April 12th, correct?

13 A. Yes.

14 Q. And you wrote this check, right?

15 A. Yes.

16 Q. And I believe you testified on direct that the name on this
17 check, Changfu Wang, is your husband, right?

18 A. Yes.

19 Q. And you sent this check to VOG, correct?

20 A. Well, Voice of Guo Media.

21 Q. And who told you where to send this check?

22 A. Miles Guo said if it's less than \$100,000, that it's mailed
23 to Voice of Guo Media and that is in charge by Sara Wei.

24 Q. Who provided the address?

25 A. The address was sent by Lihong Wei.

0641GU04

Li - Cross

- 1 Q. Do you know someone by the name of Guo Bing?
- 2 A. Yes.
- 3 Q. Who is Guo Bing?
- 4 A. So Guo Bing is the person in charge to collect money for
- 5 Sara Wei, Lihong Wei.
- 6 Q. Okay. And Lihong Wei is Sara Wei.
- 7 A. Lihong Wei is Sara Wei.
- 8 Q. And Guo Bing worked for Sara Wei, correct?
- 9 A. This person worked for both Miles Guo and Sara Wei.
- 10 Q. Now I believe you testified that in addition to this
- 11 \$10,000 check, you sent two \$5,000 bank transfers; is that
- 12 right?
- 13 A. Yes.
- 14 Q. Were those sent before or after the check?
- 15 A. Before.
- 16 Q. And Sara Wei provided you with the account to transfer that
- 17 money to electronically, right?
- 18 A. I don't recall exactly. It was either Guo Bing or Sara
- 19 Wei, either one of them.
- 20 Q. Okay. And it was your understanding that Sara controlled
- 21 the account that you transferred this money to, correct?
- 22 A. Yes.
- 23 Q. Isn't it true that you never participated in any
- 24 discussions between Mr. Guo and Sara Wei about your transfers
- 25 of money for the GTV investment?

0641GU04

Li - Cross

1 A. Can you please explain.

2 Q. You never had any discussions with—strike that.

3 Withdrawn.

4 You testified earlier that Sara Wei or Guo Bing were
5 the ones who provided you with the wire transfer information,
6 right?

7 A. Yes.

8 Q. And that the accounts that you transferred the money to
9 were controlled by Ms. Wei.

10 A. Yes.

11 Q. Mr. Guo didn't participate in any of those discussions with
12 Ms. Wei, correct?

13 A. Can you please—I don't quite understand your question.

14 THE COURT: So when you were communicating with Sara,
15 when you had contact with Sara, was Miles Guo part of that
16 contact, part of that conversation?

17 THE WITNESS: No.

18 Q. And you never heard Mr. Guo tell Ms. Wei where investors
19 should send money, right?

20 A. No.

21 Q. If Mr. Guo gave Ms. Wei any directions—withdrawn.

22 You don't know whether Sara Wei was following any
23 instructions that she got from Mr. Guo, correct?

24 THE COURT: One moment.

25 There just seems to be a noise coming from somewhere

O641GU04

Li - Cross

1 but it's not one that we control. We've asked the facilities
2 department to look into that. In the meantime, jurors, you can
3 hear the witness and the attorney?

4 THE JURORS: Yes.

5 THE COURT: I see they're saying yes, and so you may
6 go ahead.

7 MR. SCHIRICK: I believe there was a question pending,
8 your Honor?

9 THE COURT: Okay. So I'd like the reporter to please
10 read back the question.

11 (Record read)

12 A. So I know that the Miles Guo give the instructions to
13 receive that 2,000 shares for the shareholders, for the GTV
14 shareholders.

15 Q. Let's try it this way: You testified that you weren't
16 involved in any discussions between Mr. Guo and Ms. Wei,
17 correct?

18 MR. HORTON: Objection. Asked and answered.

19 THE COURT: Overruled. You may continue.

20 What's the question?

21 MR. SCHIRICK: I believe the translator just
22 translated it.

23 THE COURT: No, no. You said "You testified," and
24 then you did not ask a question after that.

25 MR. SCHIRICK: Does the court reporter have a

O641GU04

Li - Cross

1 question? I thought I asked a question, but perhaps I—

2 (Record read)

3 THE COURT: I didn't hear the "correct."

4 So yes, go ahead. You can answer that question.

5 A. No.

6 Q. No meaning you weren't involved, correct?

7 A. Participate in what?

8 Q. Conversations, ma'am, between Mr. Guo and Ms. Wei.

9 A. So on the livestreaming that Guo assigned that Wei to
10 collect the money.

11 MR. SCHIRICK: Move to strike as nonresponsive.

12 THE COURT: The answer is stricken. Move on.

13 Q. Any instructions Mr. Guo gave to Ms. Wei when you weren't a
14 party to the conversation, you have no idea if she followed
15 those instructions, right?

16 A. The way you asked me the question, I don't know how to
17 answer.

18 Q. Ma'am, are you understanding the interpreter okay?

19 THE COURT: The interpreter needs to pose that
20 question to the witness.

21 A. Yes.

22 Q. Mr. Guo didn't tell you what accounts to send money to,
23 right?

24 A. So he didn't tell me which account but he—

25 THE INTERPRETER: Excuse me. Sorry.

0641GU04

Li - Cross

1 A. So he said that in the livestreaming, he said for the
2 amount of money that's less than \$100,000 that Lihong Wei will
3 collect for Voice of Guo Media.

4 Q. Did he give you account numbers, ma'am?

5 A. No.

6 Q. The only people who gave you account numbers were Sara Wei
7 or Guo Bing, right?

8 A. Yes.

9 Q. Okay. Now you testified earlier that you made a loan
10 through the Phoenix farm, correct?

11 A. Yes.

12 Q. Between September and November of 2020, correct?

13 A. Yes.

14 Q. And Sara Wei founded the Phoenix farm, correct?

15 A. It was Miles Guo that assigned her to establish the farm.

16 Q. She established the farm, correct?

17 THE INTERPRETER: Excuse me?

18 Q. She established the farm, correct?

19 A. Yes.

20 Q. And Sara encouraged supporters to send money to her farm,
21 correct?

22 A. Can you please repeat.

23 Q. Sara Wei encouraged supporters to send money to the Phoenix
24 farm, correct?

25 A. Can I say something?

0641GU04

Li - Cross

- 1 THE COURT: Just answer the question.
- 2 A. Yes.
- 3 Q. Okay. And in making the loan, you coordinated with Sara or
4 Guo Bing, correct?
- 5 A. Yes.
- 6 Q. On Discord, correct?
- 7 A. Yes.
- 8 Q. Over email too?
- 9 A. Yes.
- 10 Q. And you followed Sara's instructions to make the loan,
11 correct?
- 12 A. Yes.
- 13 Q. And you did what she told you to do, right?
- 14 A. Yes.
- 15 Q. And you didn't send any money to Miles Guo for the farm
16 loan, right?
- 17 A. Yes.
- 18 Q. And it was your understanding that the farm loan would
19 entitle you to both interest on the loan and GTV stock; is that
20 right?
- 21 A. Yes.
- 22 Q. And that understanding was based on a loan agreement that
23 you signed, correct?
- 24 A. Yes.
- 25 Q. And you did sign a loan agreement with the Phoenix farm?

O641GU04

Li - Cross

1 A. I signed the agreement but they didn't sign it back.

2 Q. Did you review the loan agreement carefully before you sent
3 it?

4 A. I didn't review it carefully because I trust Miles Guo and
5 Sara Wei.

6 Q. Did you discuss it with your husband?

7 MR. HORTON: Objection, your Honor.

8 THE COURT: Overruled. You may answer.

9 A. No.

10 Q. Where is that loan agreement?

11 A. Can you please repeat.

12 Q. Do you have any copy of the loan agreement?

13 A. Yes.

14 Q. Did you provide a copy of that agreement to the government?

15 A. What I provide to the government, I sent it through email
16 and also the regular mail.

17 Q. Okay. So just to clarify, your testimony is that you sent
18 your farm loan agreement, a copy of your farm loan agreement to
19 the government, correct?

20 A. I did send it.

21 Q. Now is the Phoenix farm identified as the borrower on your
22 farm loan agreement?

23 A. Let me think.

24 Q. Take your time.

25 A. Because it was a long time ago.

O641GU04

Li - Cross

1 I think it should be Phoenix farm. Oh, no, it's not.
2 No.

3 Q. Okay. Did there come a time when you learned that Mr. Guo
4 and Sara Wei had a falling-out?

5 A. Yes.

6 Q. And that was toward the end of 2020?

7 A. Yes.

8 Q. And do you know, was it your understanding that Ms. Wei was
9 accused of mishandling farm loan funds?

10 MR. HORTON: Object. Lack of foundation.

11 THE COURT: Overruled. You may answer.

12 A. Can you please repeat the question.

13 Q. Is it your understanding that Sara Wei was accused of
14 mishandling farm loan funds?

15 A. You mean from my understanding, right?

16 Q. Correct.

17 A. My understanding in the very beginning is Sara, Guo—Sara
18 Wei and Miles Guo, they are working together.

19 MR. SCHIRICK: Move to strike as nonresponsive, your
20 Honor.

21 THE COURT: The answer is stricken. Pay careful
22 attention to the question before you answer.

23 THE WITNESS: Okay.

24 Q. Was Sara—is it your understanding that Sara Wei was
25 accused of mishandling farm loan funds?

O641GUO4

Li - Cross

1 A. Yes.

2 Q. And Mr. Guo was unhappy about that, right?

3 MR. HORTON: Objection.

4 THE COURT: Overruled. You may answer as to whether
5 you observed him unhappy.

6 A. I didn't observe that he was not happy.

7 Q. Ultimately, Sara Wei left the Phoenix farm, right?

8 A. That was a communication platform.

9 MR. SCHIRICK: I'm sorry. Could I just ask the
10 interpreter to repeat that.

11 THE INTERPRETER: "That was a communication platform."

12 THE COURT: "That was a communication platform."

13 That's the answer.

14 THE INTERPRETER: Yes.

15 BY MR. SCHIRICK:

16 Q. Did a point in time come when Ms. Wei was no longer
17 involved with the farms?

18 A. Because this is not what's going on.

19 MR. SCHIRICK: Move to strike, your Honor.

20 THE COURT: The answer is stricken.

21 Q. Same question: Did a time come when Sara Wei was no longer
22 involved with the farms?

23 A. She had been participating in the matter.

24 MR. SCHIRICK: Move to strike, your Honor.

25 THE COURT: The answer is stricken.

0641GU04

Li - Cross

1 Q. Were many people upset with Sara Wei at the end of 2020?

2 MR. HORTON: Objection, your Honor.

3 THE COURT: One moment.

4 You can state whether you observed other people upset
5 with Sara Wei.

6 A. When the farm was dismissed.

7 Q. So is that yes, people were upset with Sara Wei when the
8 farm was dismissed?

9 A. It's not that they are upset, because they want money.

10 Q. And Sara didn't give it to them, right?

11 A. I'm not sure. They didn't—she didn't give me the money.

12 Q. And you were upset with her, right?

13 A. Yes.

14 Q. And a lot of people were upset with her, right?

15 A. That's right.

16 Q. Okay. Now you testified on direct about some protests that
17 you were involved in, right?

18 A. Yes.

19 Q. And there was a protest in Texas, right?

20 A. Yes.

21 Q. And there was a protest in Hawaii, correct?

22 A. Yes.

23 Q. And there was a protest in Los Angeles, correct?

24 A. Yes.

25 Q. And you participated in each of these protests, right?

0641GU04

Li - Cross

1 A. Yes.

2 Q. The protest in Texas, you understood that the movement was
3 protesting a person named Bob Fu, correct?

4 A. Yes.

5 Q. Sometimes called Pastor Fu, correct?

6 A. Yes.

7 Q. And at the time you believed that Fu was a CCP operative,
8 right?

9 A. No.

10 Q. At the time you did not believe that pastor Fu was a CCP
11 operative?

12 MR. HORTON: Objection. Asked and answered.

13 THE COURT: Sustained. Don't translate the question.
14 The objection is sustained.

15 Q. Why did you go?

16 A. Miles Guo said he was the CCP's spy.

17 Q. But you didn't believe that?

18 A. Whatever he said at that time, I believed him.

19 Q. Didn't you just testify that you didn't believe that Pastor
20 Fu was a CCP spy?

21 A. What you just asked me earlier is not what that meant.

22 Q. Ma'am, which is it? Did you believe he was a spy when you
23 participated in the protest or not?

24 A. So Miles Guo took out that he holds like a law permit at
25 CCP and to tell us that he was the spy.

0641GU04

Li - Cross

1 MR. SCHIRICK: Move to strike, your Honor.

2 THE COURT: The answer is stricken.

3 Q. Ma'am, my question is: What did you believe?

4 A. I believed what Miles Guo said at that time.

5 Q. Okay. And the protest against Bob Fu took place around
6 October of 2020, right?

7 A. Yes.

8 Q. In Texas.

9 A. Yes.

10 Q. And you went there to protest for the people from the
11 Phoenix farm, right?

12 A. Yes.

13 Q. And in Texas, Sara Wei led that protest, correct?

14 A. I don't know how to answer this question.

15 Q. Who that was in Texas was the leader of the protest?

16 A. There were three people.

17 Q. Three people in Texas?

18 A. Three person that direct the protest.

19 Q. Again, in Texas?

20 A. Yes.

21 Q. Okay. Who were those three people?

22 A. It's "Long Island" and also "Texas Cowboy." I don't know
23 the exact name.

24 Weng Lai (ph) is also called Teng Fung Chin (ph).
25 Ocean, Chen Qi Shen (ph).

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1 Q. I believe that was more than three people, correct?

2 A. The way you ask—please wait. The way you ask—please
3 wait. Let me think.

4 Q. Of course.

5 A. So Miles Guo said on GTV that we send 20 people, and Bob Fu
6 said that we need to send more people.

7 MR. SCHIRICK: Your Honor, move to strike.

8 THE COURT: The answer is stricken.

9 You just said that there were some people who were
10 leaders. Is there a number of people? Can you tell us the
11 number of leaders.

12 THE WITNESS: Yes. Three or four.

13 BY MR. SCHIRICK:

14 Q. In Texas.

15 A. Yes.

16 Q. I got Sara Wei, I got Long Island David, and I got Texas
17 Cowboy; am I right so far?

18 A. So Texas Cowboy, Chen Qi Shen, Sher Wang Wong (ph). That's
19 all I know.

20 THE COURT: Very well.

21 MR. SCHIRICK: Was there—

22 THE COURT: We have come to the end of our work today.

23 Members of the jury, you'll return to court tomorrow
24 as usual, ready to come into the courtroom at 9:30. Remember,
25 do not discuss the case amongst yourselves, don't permit others

O641GU04

1 to discuss it in your presence, don't read, watch, listen to
2 anything concerning this case from any source. Have a good
3 evening.

4 (Jury not present)

5 THE COURT: Ma'am, you must return to court tomorrow
6 to be ready to walk into the courtroom by 9:29. Do not discuss
7 the case. You are excused.

8 You may step out.

9 (Witness not present)

10 THE COURT: You may be seated.

11 Do the parties have anything before we stop for today?

12 MR. FINKEL: Your Honor, just a question for defense
13 counsel, Mr. Schirick. Just approximately how much time do
14 they believe they have left on cross with Ms. Li, so we can
15 evaluate scheduling and things like that.

16 MR. SCHIRICK: That's a tough one, your Honor. It
17 certainly depends in large part on the witness. I would say I
18 probably have at least, you know, another hour, hour and a
19 half. And we'll confer and get back to the government on this.

20 THE COURT: Confer. That's a good idea.

21 MR. SCHIRICK: Certainly.

22 MR. FINKEL: I'm sorry. Did I hear an hour, hour and
23 a half?

24 THE COURT: That's what he said.

25 MR. FINKEL: Okay.

O641GUO4

1 THE COURT: Anything further?

2 MR. KAMARAJU: Just one brief thing, your Honor. I
3 don't believe we received production of a farm loan agreement
4 for the witness which the witness testified she provided to the
5 government, so we'd just ask for production of that.

6 THE COURT: Did she turn over a farm loan agreement to
7 the government?

8 MR. FINKEL: So, your Honor, sitting here today, I
9 don't know. What I do know is what we received from her, we
10 produced. We'll double-check, make sure everything was
11 provided. It's possible she sent it to a different government
12 agency, like HSI, Homeland Security, or the SEC. We don't
13 know. But if we have it, we'll produce it.

14 MR. KAMARAJU: Thank you.

15 THE COURT: Very well. Thank you.

16 (Adjourned to June 5, 2024, at 9:00 a.m.)

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GOVERNMENT EXHIBITS

10		
11	Exhibit No.	Received
12	GXW1012 and GXW1012-V1145
13	VI191, VI1921182
14	VH71174
15	VH81172
16	VH91178
17	1201175

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