

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT  
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

CASE NO. 1025859 CA13

EL INSTITUTO COSTARRINCENSE DE	)	
ELECTRICIDAD	)	VIDEO
	)	
Plaintiff	)	DEPOSITION
	)	
VS.	)	OF
	)	
ALCATEL-LUCENT, S.A. f/k/a	)	CHRISTIAN SAPSIZIAN
ALCATEL, S.A., ALCATEL CIT, S.A.	)	
n/k/a ALCATEL-LUCENT FRANCE,	)	
ALCATEL LUCENT TRADE INTERNATIONAL)	)	
AG a/k/a CENTROAMERICA, S.A. a/k/a)	)	
ALCATEL DE COSTA RICA, S.A.,	)	
ALFREDO REDONDO, and JOHN and	)	
JANE DOES 1-100	)	
	)	
Defendants	)	

DEPOSITION taken before me, Jodie L. Algarin, a Notary Public within and for the State of Ohio, on the 30th Day of November, 2010, pursuant to Notice and at the time and place therein specified, to be used pursuant to the Rules of Civil Procedure or by agreement of counsel in the above cause of action, pending in the Circuit Court of the Eleventh Judicial Circuit in and for Miami-Dade County, Florida.

1	
2	APPEARANCES
3	
4	On Behalf of Plaintiff:
5	Burton W. Wiand, Attorney at Law
6	Wiand, Guerra, King
7	3000 Bayport Drive
8	Suite 600
9	Tampa, Florida 33607
10	
11	On Behalf of Defendant, Alcatel-Lucent, S.A., Alcatel-Lucent France, Alcatel Lucent Trade International and Alcatel Centroamerica, S.A.:
12	James C. Dugan, Attorney at Law
13	Willkie, Farr & Gallagher, LLP
14	787 Seventh Avenue
15	New York, New York 10019-6099
16	
17	On Behalf of Defendant, Alfredo Redondo:
18	Tammy L. Roy, Attorney at Law
19	Cahill, Gordon & Reindel, LLP
20	80 Pine Street
21	New York, New York 10005
22	
23	Also Present:
24	William Carney, Videographer
25	Doina Francu, Interpreter

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STIPULATIONS

It is stipulated and agreed by and between counsel for the parties hereto that the deposition may be taken at this time, 9:38 a.m., November 30, 2010, in the offices of Northeast Ohio Correctional Center, 2240 Hubbard Road, Youngstown, Ohio.

It is further stipulated and agreed by and between counsel that the deposition may be taken in shorthand by Jodie L. Algarin, a Notary Public within and for the State of Ohio, and may be by her transcribed with the use of computer-assisted transcription; that the witness will read and sign the finished transcript of his deposition.

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1 VIDEOPHOTOGRAPHER: Here begins the video  
2 deposition of Christian Sapsizian. Attorney Wiand will  
3 explain the caption, Case No. and --

4 MR. WIAND: Fine. This is a deposition  
5 taken in a civil proceeding pending in Circuit Court in  
6 Miami, Florida, and it's captioned Instituto Costarricense  
7 De Electricidad versus Alcatel Lucent, SA, et al, and the  
8 et al is a number of subsidiaries of that company and an  
9 individual defendant, Mr. Alfredo Redondo.

10 The deposition is going to be taken as a video  
11 deposition, and we also have an interpreter here today,  
12 Ms. Doina Francu.

13 INTERPRETER: Yes.

14 MR. WIAND: The parties to the  
15 proceeding are represented by counsel here today. I am  
16 Burton Wiand and I represent the Instituto Costarricense  
17 De Electricidad, which will probably be referred to as ICE  
18 most of the time in the proceeding; and the defendants  
19 also have counsel present. Would they please note their  
20 appearances?

21 MR. DUGAN: Yes. This is James Dugan  
22 from Willkie, Farr & Gallagher, counsel for the Alcatel  
23 defendants.

24 MS. ROY: This is Tammy Roy of Cahill,  
25 Gordon & Reindel on behalf of Alfredo Redondo.

1 MR. WIAND: Okay. Are we better? Okay.

2 Our witness today is Mr. Christian Sapsizian and we are  
3 taking the deposition in the Northeast Ohio Correctional  
4 Center in Youngstown, Ohio; and it's 9:38. Good morning,  
5 Mr. Sapsizian.

6 MR. DUGAN: Are we going to swear the  
7 witness in?

8 MR. WIAND: Did you do that?

9 WHEREUPON,

10 DOINA FRANCU,

11 of lawful age, being by me first duly  
12 sworn as the French interpreter.

13 WHEREUPON,

14 CHRISTIAN SAPSIZIAN,

15 of lawful age, being by me first duly  
16 sworn and testified through the French  
17 interpreter to testify the  
18 truth, the whole truth, and nothing but  
19 the truth, as hereinafter certified,  
20 deposes and says as follows:

21 DIRECT EXAMINATION:

22 BY MR. WIAND

23 Q Okay. Mr. Sapsizian, can you tell us  
24 what your age, nationality and educational background are?

25 A Yes. I understood the question. I'm

1 going to answer it in French. I'm 64 years old and I am a  
2 scientist by training. And I am a graduate of the Ecole  
3 Superieure d'Electricite, engineering school of  
4 electricity in Paris.

5 Q After completing your education, would  
6 you describe your professional career?

7 A I worked -- after I graduated I worked  
8 in two companies. The first one -- the name was  
9 Compangnie Generale De Constructions Telephoniques.  
10 Between 1974 and '81.

11 VIDEOGRAPHER: Excuse me. Off the  
12 record.

13 (Whereupon an off-the-record discussion was had.)

14 VIDEOGRAPHER: Back on the record. The  
15 time's 9:43 a.m.

16 MR. WIAND: Could you tell me the answer  
17 to his second part of his answer?

18 (Whereupon the record was read as requested.)

19 Q Okay. And from '81 forward, where did  
20 you work?

21 A Between 1981 and 2004 into the Alcatel  
22 group.

23 Q Okay. And where were you employed by  
24 Alcatel?

25 A So in the beginning in Paris and then

1 Velizy, which is a suburb of Paris.

2 Q Okay. From 1995 through 2004, would you  
3 describe what your jobs were for the Alcatel group and  
4 what your duties were?

5 A So there are two periods between 1995  
6 and the arrival of Redondo, and then afterwards it's a  
7 Redondo era.

8 Q Okay. Prior to the -- what you describe  
9 as the Redondo era, prior to that period of time, what  
10 were your duties and your job at that point?

11 A I had two activities. The first one,  
12 which was called in English the business division of  
13 Alcatel commutation, for which I was the sales -- in sales  
14 support manager. In Alcatel C -- in the CIT, Alcatel; and  
15 the second activity was what is called the L'Area which is  
16 L'Area for Latin America, for which I was the  
17 vice-president -- vice-president's deputy or deputy  
18 vice-president for Latin America, for the Latin America  
19 area. And that person's name was Gufflet, G-U-F-F-L-E-T.

20 Q And what was Mr. Gufflet's position?

21 A He was the vice-president for Latin  
22 America area except for Brazil and Mexico.

23 Q Okay. And was there a president for  
24 Latin America at that time?

25 A The president's name was Canalejo.



1 That's spelled C-A-N-A-L-E-J-O.

2 Q Okay. And what were your duties and  
3 what jobs did you perform as deputy vice-president for  
4 Alcatel Latin America?

5 A In this position that took between 5 and  
6 10 percent of my time, and the rest of the time was -- I  
7 was involved in the business division. So within my  
8 activity I had the Latin America area with two positions,  
9 two jobs to do, two functions to do. The first was to  
10 prepare the files FSE, SA that the CSOs would prepare, the  
11 country senior officers would prepare for us.

12 MR. DUGAN: It's FSE, SAR.

13 A (Through the witness) FSE and SAR.

14 Q And there are two different documents  
15 that you're talking about?

16 A (Through the witness) Yeah, two  
17 different --

18 Q Okay. And one is FSE and the other one  
19 is SAR?

20 A And to present them to Gufflet who then  
21 would distribute them to the various people who are in  
22 charge of approving and signing these documents.

23 Q Okay. And those people work for what  
24 companies who approved and signed them?

25 A To be able to answer this question I

1 think I'll have to explain you briefly the organization of  
2 Alcatel.

3 Q Okay. In doing that, was there a change  
4 in that organization around 1995?

5 A (Through the witness) Yeah.

6 Q Okay. If you could explain that, that  
7 would be helpful.

8 A In '95 there was the arrival of the  
9 president of the CEO whose name was Serge Tchuruk --  
10 that's S-E-R-G-E, T-C-H-U-R-U-K -- and a major  
11 modification took place within the Alcatel group at this  
12 time. Before that, before Tchuruk's arrival, the  
13 commercial export activity was managed by the five major  
14 subsidiaries of Alcatel, Alcatel CIT in France, Alcatel in  
15 Belgium, Alcatel SEL in Germany, and Alcatel Espana in  
16 Spain and Alcatel FACE, F-A-C-E, in Italy. And basically  
17 independently these companies were dealing with the  
18 commercial activities including OBI activities.

19 In 1995 with the arrival of Tchuruk, the diagram  
20 completely changed as follows: Over imposed to these  
21 legal companies of Alcatel, Tchuruk organized a matrix  
22 organization. On one side of the matrix a certain number  
23 of geographical areas, and on the other side of the matrix  
24 a certain number of business divisions, and as of 1995 all  
25 the legal activities that were managed by the legal

1 entities of Alcatel -- the commercial activities.

2 INTERPRETER: I'm sorry, correction.

3 A Were taken from the legal entities and  
4 entrusted to the area activities and management. I'm  
5 going to explain it as overall. So within the business  
6 division, you had on one side the technical and  
7 manufacturing activities; and in the geographical areas  
8 all the commercial activities including OV; and in the  
9 business division they had as a main activity the research  
10 and development of product, technical studies -- studies,  
11 manufacturing, technical marketing and offer preparation;  
12 and also realizing the contracts.

13 And also within the business division there is  
14 something that was important. They were in charge of the  
15 loss and profit accounts and also of offers in contracts.  
16 And in the geographical areas you had all the rest of the  
17 commercial activities, daily contact with the clients,  
18 finding and promoting various projects and contract  
19 negotiations.

20 Q And those activities by the regional  
21 structure were conducted on behalf of -- or for purpose of  
22 generating business for all of the other business  
23 entities; is that correct?

24 A Yes.

25 Q With this change in management, as part

1 of that was there something called an executive committee?

2 A Yes.

3 Q And would you explain what the executive  
4 committee was?

5 A It's what they called within the Alcatel  
6 language ex-com which was the management committee for the  
7 Alcatel group, and the members will change; its  
8 composition would change sometimes once per year,  
9 sometimes twice per year; but overall the ex-com was in  
10 charge of managing the group. It was chaired by Alcatel's  
11 CEO, Tchuruk, and as important members were certain  
12 presidents of areas, of geographic areas and some heads  
13 of -- from business divisions. Plus the head of the  
14 research and development -- sorry, human resources,  
15 financial manager of Alcatel; and I believe that's about  
16 all. Maybe I forgot one or two names there. What's  
17 important to remember is that these were the heads from  
18 the geographical areas in the business division.

19 Q Okay. And they were from various legal  
20 entities and various different area business groups?

21 A Yes.

22 Q And this group directed the overall  
23 business activities of all Alcatel entities?

24 A Yes. Yes. Beside this there was  
25 another committee -- maybe we're going to talk about it

1 later -- that was called Risk Assessment Committee, RAC,  
2 which had a central RAC and an area RAC, which was an  
3 important organization in managing the affairs of Alcatel.

4 Q Okay. And both of these organizations  
5 directed the activities of the Alcatel entities regardless  
6 of what corporation they're in or where they were?

7 MR. DUGAN: Objection.

8 A Yes.

9 MR. DUGAN: And I'm going to note my  
10 continuing objection to this line of questioning. A  
11 number of grounds including lack of relevance.

12 MR. WIAND: Okay.

13 Q Now --

14 INTERPRETER: Okay. He's asking if I  
15 can translate what was -- the exchange between the two of  
16 you.

17 MR. WIAND: Absolutely.

18 MR. DUGAN: Just to be clear. I'm  
19 entitled to object on the record to his questions and the  
20 witness can answer the question if he understands it.

21 MR. WIAND: If -- let me --

22 INTERPRETER: Sure.

23 MR. WIAND: And then you tell him. In a  
24 deposition like this it may be used later in court and the  
25 lawyers for the defendants in the case may feel that a

1 question that is asked is not proper and it is their  
2 obligation to note briefly on the record their objection  
3 to those questions. That will occur from time to time.

4 THE WITNESS: (Through the witness)  
5 Okay.

6 MR. WIAND: Once the objection is noted,  
7 we just proceed, you answer the question, we go ahead.  
8 And that's the way the procedure works. It's -- possibly  
9 at some point in time at a later date a judge may say Mr.  
10 Dugan was right, Mr. Dugan was wrong, whatever; but that  
11 is something for the future. For us here, it's merely his  
12 job to make sure that if he has views pertinent to a  
13 question that he put them on the record; fair enough?

14 MR. DUGAN: Yeah. That's fair.

15 MR. WIAND: Okay.

16 A I believe I didn't finish answering the  
17 question that you asked.

18 Q Yes.

19 A I believe you were asking me what my  
20 activities were, and I said that I had certain activities  
21 before the arrival of Redondo and other activities after  
22 the arrival of Redondo.

23 Q Okay. Now, you're speaking of the  
24 arrival of Redondo. When and what are you referring to?

25 A As far as I'm concerned, the arrival of

1 Redondo involved important changes within my -- for my  
2 activities within the area. Because I was limited by  
3 Redondo to the activity that I was describing before, the  
4 activity of presentation of these FSE, SAR files for  
5 approval and signature of the various presidents that were  
6 supposed to sign them to establish the consulting  
7 agreements.

8 Q Okay. Now, when Mr. -- when did Mr.  
9 Redondo come on the scene?

10 A I'm not quite sure. I believe it was in  
11 2000 or 2001. I don't remember exactly.

12 Q Okay. And what was his position?

13 A He was president of the Latin America  
14 area.

15 Q And what did that position -- what were  
16 his duties? What were his responsibilities and authority?

17 MR. DUGAN: Objection.

18 MS. ROY: Objection.

19 MR. DUGAN: Foundation.

20 A Overall he was in charge of Alcatel for  
21 the activities in the area that -- the activities that I  
22 described before for Latin America.

23 Q Okay. And did that include the  
24 activities of all the various entities throughout Latin  
25 America?

1 MR. DUGAN: Objection. Leading.

2 A Could you specify your question?

3 Q Yes. The authority of Mr. Redondo, did  
4 that include authority over all of the legal entities  
5 throughout Latin America?

6 MR. DUGAN: Objection.

7 A Yes. Yes. As I said before, with the  
8 arrival of Tchuruk, the -- all the commercial  
9 responsibilities were taken and were given to the  
10 geographical areas. I think it's a little complicated, as  
11 I explained before.

12 Q Okay. And with respect to the  
13 geographical area of Latin America, who did the president  
14 of Latin America report to?

15 A In my time his -- the immediate  
16 superior, immediate boss was Mike Quigley (phonetic  
17 spelling) who was the president of Alcatel U.S.A. And if  
18 I remember well, what's called in English CEO, chief  
19 operating -- COO, chief operating officer of the Alcatel  
20 group, but I'm not sure. Excuse me. What was the  
21 question you asked?

22 Q My question was who the president of  
23 Alcatel Latin America reported to.

24 A He was reporting to Mike Quigley, and I  
25 believe at some time, 2003 or 2004, when he returned to



1 Spain and I believe 2003, 2004 he was reporting to Mr.  
2 Dunogue. That's spelled D-U-N-O-G-U-E.

3 Q During the time that Mr. -- or that the  
4 president of Alcatel Latin America reported to Mr.  
5 Quigley, did Mr. Quigley also -- was he also designated  
6 president Alcatel Americas?

7 MR. DUGAN: Objection.

8 A Yes, I believe so.

9 Q And where were his offices?

10 A I think he was located in Dallas, Texas.

11 Q Now, during the period from 2000 to 2004  
12 or approximately that, where were Mr. Redondo's offices?

13 A The -- Mr. Redondo's office was in  
14 Miami.

15 Q And let me ask you about a few other  
16 people so we can place things. Do you recognize the name  
17 Mafille?

18 A (Through the witness) Mafille.

19 Q Okay. Who is Mr. Mafille and what was  
20 his job and how did he fit in your world?

21 A Mafille was one of the three  
22 vice-presidents for Latin America, and he was in charge  
23 overall of Latin America except for Brazil and Mexico.

24 Q Okay. And what was your relationship to  
25 him?

1 A Within the organization charge for --  
2 chart for the area, I was the deputy of -- assistant --

3 INTERPRETER: Sorry.

4 A Assistant to Marcel Mafille and not as I  
5 saw it written occasionally as the deputy vice-president  
6 of Mafille.

7 Q Okay. And who is Miguel Robirosa?

8 A He was a former -- Miguel Robirosa was a  
9 former key account manager and Alfredo Redondo was his  
10 boss. When Alfredo Redondo was the CSO for Argentina and  
11 then he went to Redondo's organization in Miami as  
12 vice-president for marketing, then deputy vice-president  
13 of Marcel Mafille, and then he replaced Marcel Mafille as  
14 vice-president for Latin America minus Brazil and Mexico.

15 Q And up until 2004 where were his  
16 offices?

17 MR. DUGAN: Objection. Foundation.

18 A I don't know exactly the date. It was  
19 2003 or 2004, but he was located in Miami and then  
20 later -- I don't remember exactly the date -- he passed  
21 from Miami to Mexico.

22 Q Okay. And while he was in Miami, what  
23 area did he have responsibility over?

24 A While as the vice-president for  
25 marketing, he was covering all of Latin America including

1 Brazil and Mexico; and after he replaced Marcel Mafille  
2 and then he was in charge of the whole of Latin America  
3 except for Brazil and Mexico.

4 Q Now, with respect to the offices that  
5 were in Miami, do you recall the address?

6 A (In French, uninterpreted).

7 A (Through the witness) -- Blue Lagoon.

8 Q If I suggested to you that it was 5200  
9 Blue Lagoon, would that refresh your recollection?

10 A Not really, but it was definitely Blue  
11 Lagoon near the airport.

12 Q Okay. Now, do you recognize the name  
13 Guardiola?

14 A Yes.

15 Q Who is Mr. Guardiola?

16 A He was the -- I use the expression  
17 manager, but maybe it's better to say vice-president for  
18 human resources for Alcatel Latin America.

19 Q Okay. And did he have oversight over  
20 all of the human resources issues for the Latin American  
21 entities?

22 MR. DUGAN: Objection. Vague.  
23 Foundation.

24 A Yes.

25 Q And who did he report to?

1 A (Through the witness) Alfredo Redondo.

2 Q Now, since we began, I indicated that  
3 we're here in a correctional facility in Ohio. Why are  
4 you here?

5 A I'm here because I was arrested by the  
6 American authorities.

7 Q Okay. And did that relate to the  
8 international payment of corrupt payments to government  
9 officials and company officials?

10 MR. DUGAN: Objection to form.  
11 Objection to the vagueness of the word corrupt.

12 A (Through the witness) Oui.

13 Q Okay. Bribes?

14 A (Through the witness) Oui.

15 Q Okay.

16 A Yes, yes.

17 Q And with the -- it's correct that in  
18 2008 that you pled guilty and were sentenced to prison; is  
19 that correct?

20 A (Through the witness) Oui.

21 Q And that was in Federal Court in Miami?

22 A (Through the witness) Oui.

23 MR. DUGAN: Is he saying yes?

24 INTERPRETER: Yes, yes. I'm sorry.

25 MR. WIAND: Police that if you can.

1 MR. DUGAN: I'll do my best.

2 MR. WIAND: Okay. I have a document  
3 that I want to mark as Exhibit No. 1. I sort of screwed  
4 this up because I brought the wrong number, but let me  
5 give him one, and if you all could sort of share?

6 MS. ROY: Sure.

7 Q And --

8 (Whereupon Plaintiff's Exhibit No. 1 was marked.)

9 MR. DUGAN: Are you calling this ICE  
10 Exhibit 1?

11 MR. WIAND: Yes, I am. Marked it like  
12 that.

13 MR. DUGAN: Okay.

14 MR. WIAND: Okay. I have marked this  
15 document ICE Exhibit 1, Sapsizian.

16 Q And, Mr. Sapsizian, I would like to hand  
17 this to you. If you take a moment and look through it.  
18 Tell me when you're finished, and I will have some  
19 questions for you.

20 MR. DUGAN: Is this going to be  
21 something the court reporter takes with her, because he's  
22 writing on it.

23 COURT REPORTER: I'm sorry?

24 MR. DUGAN: Maybe he should know that.  
25 It's your deposition.

1 COURT REPORTER: Sir, I can't hear you.

2 MR. DUGAN: I'm really speaking off the  
3 record.

4 VIDEOGRAPHER: Excuse me. We're still  
5 on the video.

6 MR. WIAND: Okay.

7 VIDEOGRAPHER: I can go off if you want.

8 MR. WIAND: I sort of anticipating he  
9 was going to redraft it, but --

10 MR. DUGAN: I just think he should know  
11 the court reporter's going to take the exhibit if he's  
12 going to write on it.

13 MR. WIAND: The exhibit is going to be  
14 taken by the court reporter, and if it has notes on it --  
15 so I think maybe if you want to read it and make mental  
16 notes, it might be better.

17 THE WITNESS: (Through the witness)  
18 Okay.

19 MR. WIAND: You said Snickers; right?

20 THE WITNESS: (Through the witness)  
21 Thank you.

22 VIDEOGRAPHER: Snaps right in.

23 THE WITNESS: Okay. I'm ready.

24 Q Okay. This was a document -- if you  
25 look at the last page, that document bears your signature,

1 does it not?

2 A (Nodding head.)

3 Q And -- you have to give an audible  
4 answer.

5 A Yes, yes.

6 Q Okay. And this was submitted for the  
7 purposes of your plea in the United States District Court;  
8 is that correct?

9 A Yes.

10 Q And does this document contain factual  
11 information regarding the activities that occurred in  
12 Costa Rica?

13 A Yes.

14 Q Now, in the document it mentions an  
15 entity known as Servicios Notariales?

16 A (Through the witness) Uh-huh.

17 Q And would you describe what the purpose  
18 and the function of that entity was in connection with  
19 Alcatel's sales activities in Costa Rica?

20 A The functions of an Alcatel consultant  
21 generally were -- general as in most cases were contracted  
22 by Alcatel to distribute funds to various people -- to  
23 various decision makers to obtain contracts in favor of  
24 Alcatel.

25 Q And Servicios Notariales was such an

1 entity?

2 A Yes. It was an Alcatel consultant.

3 Q And for how long a period of time had  
4 Alcatel used such consultants?

5 MR. DUGAN: Objection. Foundation.

6 Q How long had you been aware that Alcatel  
7 utilized such consultants?

8 A Since I saw the documents, the FSE, SAR  
9 in 2000, 2001. I believe it was 2001.

10 Q Okay. I'm not speaking specifically of  
11 Servicios Notariales but consultants of the purpose you  
12 described in general. How long had Alcatel utilized such  
13 consultants?

14 MR. DUGAN: Objection. Foundation.

15 A For tens of years.

16 Q Now, prior to the use of Servicios  
17 Notariales, was there a prior consultant in Costa Rica?

18 A Yes.

19 Q And what was the name of that company?

20 A (Through the witness) Intel Mar.

21 Q And what did that company do?

22 A (In French, uninterpreted)

23 Q It distributed money to decision makers  
24 to get business?

25 MR. DUGAN: Objection. Leading.



1 Q Is that correct?

2 A (Nodding head.)

3 Q And with respect to the business that  
4 was acquired through the efforts of Servicios Notariales,  
5 that was stated in the document \$149 million GSM contract?

6 A I don't remember the amount, but  
7 overall, yes.

8 Q And with respect to Intel Mar, the  
9 relationship had been ongoing for years; is that true?

10 A I believe since 1982 or 1983.

11 Q Okay. And would you agree that the  
12 total amount of business that was acquired was in the  
13 hundreds of millions of dollars?

14 MR. DUGAN: Objection. Foundation.

15 A Yes.

16 Q And you were personally aware of that  
17 business and those agreements; correct?

18 MR. DUGAN: Objection. Vague.

19 A Yes. Like most of the people who worked  
20 in export for Alcatel, we were aware that's how they  
21 acquire their contracts.

22 MR. DUGAN: Move to strike.

23 A When I'm talking about most of the  
24 people, I'm also including the secretaries, if you want  
25 that, was part of the Alcatel culture.

1 MR. DUGAN: Motion to strike Mr.

2 Sapsizian's answer to the extent that he is imposing  
3 knowledge on, quote, unquote, most of Alcatel.

4 Q The -- I would like you to -- I would  
5 like you to look at Paragraph 14 of this document. Okay.  
6 That relates to approval of consulting contracts. Would  
7 you describe for me the procedure that was utilized in  
8 order to have a consultant retained in order to provide  
9 the services that you've described?

10 A The standard procedure for the Alcatel  
11 company had been established by Alcatel Standard. When a  
12 project was detected by the CSO and the key account  
13 manager of the area, the responsibility of the CSO was --  
14 one of his responsibilities was to determine that if  
15 Alcatel needed to get the project, they needed to obtain  
16 the services of a consultant. And if, yes, to look on the  
17 market of the country considered for the most appropriate  
18 consultant -- the most appropriate for Alcatel and the  
19 cheapest.

20 Once he fulfilled his duty, he had to present them to  
21 Alfredo Redondo to explain to him why there was a need for  
22 a consultant, et cetera. If the reply from Redondo was a  
23 positive one, the CSO had to fill out two forms. The  
24 first one was called FSE. I believe that stands for  
25 forecast sales expenses, and I believe the SAR stands for

1 service agreement request. The CSO would fill out these  
2 forms. The FSE contained general information about the  
3 project, the country, the client, the amount of the  
4 project. If there was an account or not on the order the  
5 legal unit concerned within Alcatel and the business  
6 division or divisions concerned within Alcatel.

7 Further down on this FSE form there were the  
8 percentages to be allocated to the consultant or to the  
9 various consultants as well as the chronological list of  
10 payments from Alcatel to these consultants. That is the  
11 calendar of payments, when a certain amount was to be  
12 paid, et cetera. This form was presented as a note  
13 addressed by the president of the area to a certain number  
14 of people which, if I remember well, are the president of  
15 the business division concerned, the president of the  
16 legal unit concerned and the president of Alcatel  
17 Standard.

18 And as a copy also I remember seeing the name of the  
19 president of Alcatel Standard Barras on the form, and with  
20 this note the president of the area was asking the above-  
21 mentioned people to take into account that if one offer  
22 would be successful -- I'm sorry. It was supposed to be  
23 submitted to the client, then these percentages, these  
24 so-called sales expenses, had to be included in the price  
25 of the offer, or at least taken into consideration by the

1 people in charge of developing the offer.

2 Then the second form was the service agreement  
3 request, which was a preestablished note of which the  
4 president of the area considered was sending to Barras as  
5 president of Alcatel Standard asking him to grant one or  
6 several consulting agreements, to establish the consulting  
7 agreements. Also mentioning in this form, the main  
8 characteristics of the project, of the offer, also  
9 reprising the percentages mentioned on the previous form,  
10 the FSE. Also indicating the name and address of the  
11 consultant, the banking information for the consultant,  
12 where the funds were to be transferred as per the  
13 consulting agreement. At the bottom I remember there was  
14 a list of services to be performed by the consultant for  
15 Alcatel.

16 Q Now, these documents that listed the  
17 services to be performed, did they accurately reflect what  
18 the consultant was going to do?

19 A No.

20 Q Okay. And with respect to the  
21 initiation of this process -- first of all, I think we  
22 need to explain. Would you explain what a CSO is? You've  
23 mentioned that a number of times.

24 A Country senior officer, which is the  
25 highest Alcatel authority within the country considered.

1 Basically there was one CSO per country.

2 Q Okay. And the CSO you said was -- it  
3 was their job to evaluate the necessity of using a  
4 consultant?

5 A (Through the witness) Uh-huh.

6 MR. DUGAN: Objection.

7 A Among his responsibilities there was  
8 also this mission.

9 Q Okay. And when a consultant was sought,  
10 what information about that need for a consultant was  
11 conveyed to Mr. Redondo and the other presidents and  
12 vice-presidents?

13 MR. DUGAN: Objection. Foundation.

14 A I didn't quite understand the question.

15 Q Okay. Was the substance of the reason  
16 for the need for the consultant conveyed to more senior  
17 officers in the company?

18 MR. DUGAN: Objection. Foundation.

19 A Yes. It was the overall policy of the  
20 Latin America policy, and I remember -- and there was a  
21 note from Redondo telling how this situation had to be  
22 dealt with.

23 Q Okay. In -- how often did you interact  
24 with Mr. Redondo relating to these matters?

25 A When I had enough of these FSE or SAR

1 forms from the CSOs, four or five of them, during a trip  
2 to --

3 INTERPRETER: I'm sorry. He said not  
4 five or five -- said four or five? Yes. Four or five  
5 forms.

6 A On my way to a trip to Latin America, as  
7 I was passing through Miami, I would give Redondo these  
8 forms.

9 Q Okay. And with respect to the forms,  
10 the FSE and the SAR forms that were prepared by the CSO,  
11 who carried those forms to Alfredo Redondo?

12 A Me.

13 Q And over a period of years, how many  
14 occasions had that occurred?

15 A Yeah, I'm not -- I can't tell you  
16 exactly, but what I can tell you is -- but what I can tell  
17 you is that for each offer that was presented, one or  
18 several consultants that -- one or two consultants that  
19 were contracted, but I don't have the number in my head.

20 Q Okay. And how often would you see Mr.  
21 Redondo relating to these matters?

22 A Well, for on the occasion of these  
23 trips, once every month or twice per month or once every  
24 six weeks.

25 Q And on these occasions where was it you

1 met with him?

2 A Excuse me.

3 Q Sure. Enjoy.

4 A Most of the time in the -- I believe all  
5 the time in Miami at the Blue Lagoon.

6 VIDEOGRAPHER: Excuse me. This is the  
7 end of Tape No. 1 in the deposition of Christian Sapsizian  
8 to be continued on Tape No. 2. We are off the record at  
9 10:57 a.m.

10 (Whereupon a recess was taken.)

11 VIDEOGRAPHER: This is the beginning of  
12 Tape No. 2 and continued deposition of Christian  
13 Sapsizian. We are on the record. The time is 11:02 a.m.

14 Q Now, Mr. Sapsizian, in the proceedings  
15 at your sentencing before Judge Seitz in Miami, it was  
16 indicated by the government that you had provided  
17 documents and information about 20 or more countries where  
18 this illegal conduct was occurring in different locations.  
19 Can you tell us what countries those were?

20 MR. DUGAN: Objection. Relevance.

21 A I don't have the number in my head, but  
22 I believe that most of the countries in Latin America  
23 should be among them. Los Kenia, Taiwan and Nigeria.

24 Q Okay. And with respect to these  
25 situations, did all of them involve the utilization of

1 consultants as you've described?

2 MR. DUGAN: Objection. Foundation.

3 A Yes.

4 Q And was the approval process for those  
5 consultants the same in all occasions?

6 MR. DUGAN: Objection. Foundation.

7 A Yes. Concerning the countries in Latin  
8 America. For the other countries that I mentioned in  
9 Africa and Asia, I can't answer.

10 Q Okay. With respect to the countries in  
11 Latin America, in each consultant situation, whose  
12 authorization was necessary prior to that agreement being  
13 able to be processed?

14 MR. DUGAN: Objection.

15 A The authorization of the people I was  
16 mentioning before, namely the president of the area, the  
17 president of the business division concerned, the  
18 president of the concerned unit, legal entity and the  
19 president of Alcatel Standard.

20 Q And the -- with respect to the period of  
21 time from 2001 to 2003, once or twice a month or every six  
22 weeks you carried these contracts to Miami?

23 MR. DUGAN: Objection.

24 A Yes.

25 Q And you sought whose signature there?



1 A The signature of Alfredo Redondo.

2 Q Now, the offices that were in Miami  
3 that -- was Mr. Redondo in charge of those offices?

4 MR. DUGAN: Objection.

5 A (Through the witness) Yeah.

6 Q Okay. With respect to those offices,  
7 would you describe what people were there and what  
8 functions occurred in those offices?

9 MR. DUGAN: Objection. Foundation.

10 A (In French, uninterpreted.)

11 Q Let me ask you a question. Did you go  
12 to those offices frequently and observe the business  
13 activities that were occurring in the offices?

14 A Occasionally. Each time I had documents  
15 to have signed I would stop by.

16 Q Okay. And what did you observe -- what  
17 were the operations that were taking place in that office?

18 A I attended three or four operations  
19 reviews that were chaired by Alfredo Redondo, accompanied  
20 by Robirosa, and Marcel Mafille sometimes when he was  
21 present in Miami or via video conference from Chile. Also  
22 the financial vice-president from -- for the area, and I  
23 might forget one or two people. And also facing them it  
24 was the -- in video conference it was the CSO, the deputy  
25 CSO and the financial manager for the local subsidiary.

1 Basically that was it.

2 Q And this is a review of the activity in  
3 a particular country that would be conducted by the  
4 managers in Miami?

5 A It was a detailed review, very detailed,  
6 of all the various subsidiaries of American -- Latin  
7 America of -- subsidiaries of Alcatel Latin America.  
8 Activities from the commercial activities of the financial  
9 statements of the subsidiary, the condition of development  
10 of the offers and the condition of development of the  
11 contracts. In certain important and problematic cases for  
12 important contracts like the JSM in Costa Rica, in  
13 addition to this monthly meeting with the CSO, Redondo was  
14 also chairing the monthly meetings -- the -- concerning  
15 the condition of development of the advancing of  
16 contracts.

17 Q Okay.

18 INTERPRETER: Sorry. Execution of  
19 contracts.

20 Q And for that period from 2000 to 2004,  
21 the management of all of these entities was directed in  
22 detail from this office in Miami?

23 MS. ROY: Objection.

24 MR. DUGAN: Objection to form.

25 Foundation.

1 A Yes.

2 Q Now, you mentioned or it was mentioned  
3 before in the court at your sentencing that there was a  
4 consultant's agreement with an individual who had a  
5 perfume business who happened to be the brother of the  
6 president of the country?

7 A (Through the witness) Uh-huh.

8 Q Do you recall --

9 A Yes.

10 Q -- that discussion?

11 A Excuse me. I didn't understand the last  
12 part of the question.

13 Q Do you know what I'm talking about?

14 A (Through the witness) Oui.

15 Q Okay. And what country was that?

16 A Honduras.

17 Q And with respect to the presentation and  
18 the approval of -- first of all, was the practice followed  
19 for the approval of the perfume merchant as a consultant  
20 to represent Alcatel?

21 MR. DUGAN: Objection.

22 A Yes.

23 Q And was the contract involving the  
24 perfume merchant acting on behalf of Alcatel presented in  
25 the normal fashion to Mr. Redondo?

1 MR. DUGAN: Objection.

2 A Yes. The usual way, the normal way.

3 Q Okay. And you were the one who did  
4 that?

5 A Yes.

6 Q Okay. And with respect to the  
7 presentation of that contract in your dealings with Mr.  
8 Redondo, was it known that this was the perfume merchant  
9 who was being retained as a consultant?

10 MR. DUGAN: Objection. Foundation.

11 MS. ROY: Objection.

12 A Well, I didn't discuss it with Redondo,  
13 but in the -- there was a company profile that listed all  
14 the activities of the consultant's company, so I believe  
15 the perfume aspect of his activity must have been  
16 indicated in there.

17 Q Was -- did Mr. Redondo have any personal  
18 contact with the Honduras contract or the government  
19 officials in Honduras?

20 MS. ROY: Objection.

21 MR. DUGAN: Objection. Foundation.

22 A I cannot answer this question precisely.  
23 I believe I remember seeing an e-mail that said that the  
24 president of the Republic of Honduras would visit Redondo.  
25 I cannot say if the meeting took place and when it took

1 place.

2 MR. DUGAN: Move to strike Mr.  
3 Sapsizian's answer on the grounds of hearsay.

4 Q Now, with respect to the offices in  
5 Miami, I think you indicated there was a vice-president of  
6 finance and that individual oversaw all the financial  
7 activities of Latin America?

8 A I believe so, yes.

9 Q Okay. And with respect to human  
10 resources, that was overseen by Mr. Guardiola, a  
11 vice-president of --

12 A Yes.

13 Q And with respect to Information  
14 Technology, was there any function of Information  
15 Technology at that office?

16 A Yes. Yes. There was an IT person who  
17 belonged to the structure in Miami.

18 Q And when the office was established in  
19 Miami, did you learn what the reasons were for  
20 establishing the office?

21 MR. DUGAN: Objection. Foundation.  
22 Vagueness to time.

23 A What was said in general was that  
24 important clients of Alcatel were present in Miami or in  
25 the Miami region such as Telefonica, Bell South, which

1 were, at the time, important actors in Latin America.

2 MR. DUGAN: Move to strike Mr.  
3 Sapsizian's answer on hearsay grounds.

4 Q And was this information that was  
5 related to you by other officials at Alcatel?

6 A Yes. Yes. It was known that it was  
7 something that the major events were passed on from  
8 Alcatel in Spain to Miami.

9 (Whereupon Plaintiff's Exhibit No. 2 was marked.)

10 Q I want to hand you a document that's  
11 been marked as Exhibit No. 2. You say Exhibit 2  
12 Sapsizian. I've actually done better this time. Have you  
13 had an opportunity to read that?

14 A (In French, uninterpreted).

15 Q You have had the opportunity to read  
16 Exhibit No. 2?

17 A This document, yes.

18 Q I'd invite your attention to the one --  
19 do you see there's a heading Costa Rica?

20 A Uh-huh.

21 Q And then the next paragraph below that  
22 it starts "in Costa Rica." Do you see that paragraph?

23 A Uh-huh.

24 Q It states, In Costa Rica and other  
25 countries, our subsidiaries retain consultants to assist

1 us with our local operations and contracts. Our contracts  
2 with persons through whom we deal locally strictly  
3 prohibit the provision of any pecuniary or other advantage  
4 in contravention of applicable laws. In addition, we have  
5 a strict Statement of Business Principles (a copy of which  
6 is available on our website, www.alcatel.com, under the  
7 heading 'Business Ethics and Compliance') that imposes the  
8 highest standards of legal and ethical conduct on our  
9 employees. We rigorously enforce this Statement of  
10 Business Principles across the entire company and, when  
11 violations occur, we take prompt action -- prompt and  
12 appropriate action against the persons involved.

13 Prior to the disclosures about problems in Costa  
14 Rica, does this accurately reflect that business practices  
15 that occurred in Alcatel with respect to the utilization  
16 of consultants?

17 MR. DUGAN: And I object on two grounds.  
18 Number one, I object to the introduction of this exhibit  
19 and any questions about it on the grounds that it is an  
20 incomplete document. It's obviously part of a larger  
21 document. We have no way of knowing what document it is  
22 part of on this record, and I object on that grounds.

23 I further object on the ground that the witness, I  
24 don't believe, has ever seen this document before and so  
25 there is no foundation to ask the witness any questions

1 about any statements contained therein or their providence  
2 or indeed anything about the document. With those  
3 objections, you may answer.

4 A The standard content of the Alcatel  
5 Standard's contracting agreement indicates that the funds  
6 should be used correctly, but is notorious among the  
7 people who work at Alcatel with foreign countries that  
8 these consulting agreements were just a facade to kind of  
9 instruments to allow, in fact, to distribute the necessary  
10 funds within the activities of the OBI.

11 Q And those were distributing the funds to  
12 decision makers to secure business?

13 MR. DUGAN: Object.

14 A Yes.

15 Q Okay. Now, during the period of time of  
16 2000 to 2004 -- and I think you've testified that the  
17 activities of Alcatel Costa Rica were managed from Miami  
18 by Mr. Robirosa, the other executives?

19 MR. DUGAN: Objection.

20 Q I mean Mr. Redondo and the other  
21 executives.

22 MR. DUGAN: Objection.

23 MS. ROY: Objection.

24 A No. The activities of Alcatel Costa  
25 Rica were managed by the Valverde CSO and supervised by



1 Redondo, Robirosa and Mafille.

2 Q Okay. And as you said, that was  
3 detailed supervision?

4 MR. DUGAN: Objection.

5 A Yes.

6 Q And with respect to you personally, you  
7 were a legal employee of CIT; is that correct?

8 MR. DUGAN: Objection.

9 A Yes.

10 MR. DUGAN: The term legal employee.

11 Q You were an employee of the legal entity  
12 CIT?

13 A (Through the witness ) Oui.

14 Q And that was correct at the time that  
15 you traveled from -- traveled internationally on a  
16 twice-monthly to six-week basis to have consultant  
17 contracts delivered to Miami for execution?

18 A Yes.

19 MR. WIAND: Okay. I have no further  
20 questions.

21 MR. DUGAN: Okay. I do have some  
22 questions, but can I beg all of your indulgence to have a  
23 minute or two to review what Mr. --

24 MR. WIAND: That violates the rules. Of  
25 course you can. Why don't we take a break, and I need to

1 find out what he needs to do about eating and whatever,  
2 and I think the reason for the candy bar I think he has a  
3 sugar problem. He told me he needed something.

4 MR. DUGAN: Okay. I'm happy to --

5 MR. WIAND: Let me check with him. You  
6 go ahead and start working and I'll check with him and  
7 we'll just see what we do.

8 VIDEOGRAPHER: We are off the record  
9 11:37 a.m.

10 (Whereupon a recess was taken.)

11 VIDEOGRAPHER: We are on the record.

12 The time is 12:16 p.m.

13 CROSS EXAMINATION:

14 BY MR. DUGAN

15 Q Good afternoon, Mr. Sapsizian.

16 A (Through the witness) Good afternoon.

17 Q I'm an attorney representing Alcatel,  
18 the Alcatel defendants in this case, and I have some  
19 questions for you. Before we begin, do you understand  
20 that you are still under oath?

21 A (Through the witness) Oui.

22 Q And do you understand that you are  
23 obligated to testify truthfully, to the best of your  
24 ability?

25 A Yes, of course.

1 Q And to the best of your ability?

2 A Yes, to the best of my abilities.

3 Q Mr. Sapsizian, am I correct that you are  
4 personally involved in bribing officials at the Instituto  
5 Costarricense do Electricidad?

6 A No.

7 Q You were not personally involved in  
8 that?

9 A No.

10 Q Okay. Do you have any knowledge of  
11 that?

12 A Yes.

13 Q Did you have any involvement in it?

14 A No.

15 Q Am I correct that you were personally  
16 involved in bribing government officials in Costa Rica?

17 A No.

18 Q Do you have any knowledge of that?

19 A Yes.

20 Q You deny personal involvement in it,  
21 sir?

22 A Yes.

23 Q Do you deny, sir, having conversations  
24 with officials from the Instituto Costarricense de  
25 Electricidad regarding the payment of bribes to them?

1 A Yes.

2 Q You do deny that?

3 A Yes.

4 Q Do you deny telling representatives of  
5 the United States government that you had been involved in  
6 meetings with officials at the Instituto Costarricense de  
7 Electricidad in which the payment of bribes to them was  
8 discussed?

9 INTERPRETER: Can you just read me the  
10 question back?

11 Q Do you deny telling officials of the  
12 United States government that you personally participated  
13 in conversations with representatives of the Instituto  
14 Costarricense de Electricidad in which the payment of  
15 bribes was discussed?

16 A I acknowledge attending a meeting, not  
17 participating this meeting where the term was discussed.

18 Q And so, Mr. Sapsizian, am I correct that  
19 your testimony is you attended the meeting but you did not  
20 participate in it?

21 A Yes.

22 Q Okay. And am I correct, sir, that there  
23 was more than one meeting that you attended?

24 A Yes.

25 Q Do you recall how many meetings you

1 attended?

2 A No.

3 Q Was it more than five?

4 A Yes.

5 Q Was it more than ten?

6 A Approximately ten. I can't remember.

7 But these meetings where money matters were discussed, I  
8 only attended one of those meetings.

9 Q Okay. And when you say money matters,  
10 do you mean payment of bribes to officials at the  
11 Instituto Costarricense de Electricidad?

12 A Yes.

13 Q And am I correct that the meetings that  
14 you're referring to occurred in Costa Rica?

15 A Yes.

16 Q And am I correct, sir, that Alcatel,  
17 your former employer, has brought criminal cases against  
18 you in France and in Costa Rica relating to your  
19 involvement in these meetings?

20 A I don't know if it's exactly concerning  
21 these meetings, but I know that Alcatel started to --  
22 these proceedings against me.

23 Q And in these proceedings Alcatel is  
24 accusing you of bribing government officials at the  
25 Instituto Costarricense de Electricidad?

1 A No, I don't know or I don't remember. I  
2 don't recall this.

3 Q Do you at least recall that your former  
4 employer Alcatel has accused you of wrongdoing in  
5 connection with the payments to --

6 A Yes.

7 Q -- Instituto Costarricense de  
8 Electricidad?

9 A Yes.

10 Q And am I correct, sir, that you deny the  
11 wrongdoing that your former employer has accused you of?

12 A Yes.

13 Q Do you recall when the news became  
14 public in Costa Rica concerning the payments that had been  
15 made to the officials at Instituto Costarricense de  
16 Electricidad? Do you recall when?

17 A I believe it was in October 2004.

18 Q Am I correct, Mr. Sapsizian, that after  
19 the news of this scandal broke, you experienced  
20 psychological problems requiring that you be committed to  
21 a mental health facility?

22 A Yes.

23 Q And when were you released from that  
24 facility?

25 A I believe it was five or six month

1 later.

2 Q In 2005?

3 A 2004, 2005.

4 Q And did you receive treatments for your  
5 mental illness while you were institutionalized?

6 A Yes.

7 Q Do you have any understanding as to  
8 whether any of those treatments might have caused any sort  
9 of impairment to your memory?

10 A I don't know if it was the psychological  
11 treatment or the age, but my memory could have been  
12 affected.

13 Q Mr. Sapsizian, the lawyer for the  
14 Instituto Costarricense de Electricidad asked you a number  
15 of questions regarding a period of time when you were  
16 involved in bringing forms to Miami for the approval of  
17 Mr. Redondo. Do you remember that? Do you remember those  
18 questions?

19 A Yes.

20 Q Okay. During that period of time, am I  
21 correct that you were not based -- you, yourself, were not  
22 based in Miami?

23 A Not only at that time but I never worked  
24 in Miami.

25 Q And you were based in -- near Paris,

1 France; correct?

2 A (Through the witness) Yes.

3 Q And am I correct that you did not, sir,  
4 you, yourself, did not have the opportunity to observe the  
5 operations of the Miami office on a day-to-day basis?

6 A No, not on a day-to-day basis.

7 Q And am I correct that you, sir, did not  
8 have the opportunity to observe Mr. Redondo, Mr. Redondo's  
9 activities on a day-to-day basis?

10 A No, not on a day-to-day basis, but I had  
11 the occasion to see him about three or four times manage  
12 the monthly operations with the Robirosa, Guardiola and  
13 Mafille and with the financial manager whose name was  
14 Ziger (phonetic spelling).

15 Q And you said, sir, that when you travel  
16 to Miami to bring the SAR and FSE forms --

17 A (Through the witness) Yes.

18 Q -- for Mr. Redondo to sign --

19 A (Through the witness) Yes.

20 Q -- that you were typically on your way  
21 somewhere else?

22 A (Through the witness) Yes.

23 Q And where were you typically on your way  
24 to?

25 A Mostly to countries of South America, to



1 Latin America, to Costa Rica, to Central America and also  
2 to countries like Venezuela and Ecuador and Columbia and  
3 Bolivia.

4 Q And when you would bring these forms for  
5 Mr. Redondo to review and to sign, how long would you be  
6 there while he reviewed and signed the forms?

7 A I would give him the offers -- well,  
8 the -- actually the documents, the approved documents for  
9 signature. He would just sign them and then ask me to  
10 wait outside and he would sign them and give them to me,  
11 or on other occasions it would be from this date until the  
12 next day.

13 Q Okay. And while you were waiting for  
14 Mr. Redondo to sign the forms and give them to you, where  
15 would you be? Where would you go?

16 A I was staying within the facilities of  
17 Alcatel Latin -- American -- Latin America. And I was  
18 just staying and discussing with the colleagues that I  
19 knew from the various conventions with Latin America,  
20 Alcatel Latin America.

21 Q Am I correct you were not in Mr.  
22 Redondo's company the entire time you waited for him to  
23 sign the forms and return them back to you?

24 A In general, no.

25 Q And what did you do with the forms --

1 after Mr. Redondo signed them and gave them back to you,  
2 what did you do with them?

3 A I would take them, go back to France,  
4 give them to my assistant and she would distribute them to  
5 the other presidents, to the business division president  
6 to Alcatel -- the legal entity Alcatel and Alcatel  
7 Standard, and then I believe it was Mafille that  
8 established a new procedure to make sure that all the  
9 signatories were aware of what they were signing and  
10 approving, and this procedure consisted of asking the CSO  
11 to fill out the FSE, SAR forms and to handwrite on them  
12 draft; and one -- so first of all, each one of the  
13 presidents would receive the draft form and they each had  
14 to sign and approve it and to allow them during this round  
15 to make comments or to refuse to sign. Once the first  
16 round of draft was over without comments, the second final  
17 round -- so we started the second time with Redondo,  
18 president, et cetera.

19 Q Okay. And am I correct, sir, though,  
20 focusing on the final form that after Redondo signed it  
21 and returned it to you, you then took it to France?

22 A Yes.

23 Q And as far as you know, that's where the  
24 form remains, in France?

25 A Yes. The signed forms. In France or in

1 Switzerland, I'm not quite sure, because once these forms  
2 were signed, they would go to Alcatel Standard, which is  
3 based in Switzerland but has offices in France.

4 Q And am I correct, sir, according to your  
5 testimony, in addition to Mr. Redondo's signatures, there  
6 were also signatures required from the presidents of  
7 various Alcatel entities?

8 A Yes.

9 Q And were these Alcatel legal entities?

10 A No, not in all cases. In the case of  
11 the legal entities, for instance, in the case of Costa  
12 Rica, the president of GSM -- the GSM project, the  
13 president of Alcatel CAT [sic], the president of Alcatel  
14 Standard, which is a legal corporation, but there was  
15 another signature required, the one from the business  
16 division, which is not a legal entity but a virtual  
17 company.

18 Q Okay. And focusing now on SAR and FSE  
19 forms related to Costa Rica consultants, who was required  
20 to sign the FSE and SAR forms related to specifically  
21 Servicios Notariales?

22 A (Through the witness) Redondo.

23 A The president of Alcatel CIT. I believe  
24 it was Bart, the president of the -- the mobile business  
25 division. I believe it was Rouanne, spelled

1 R-O-U-A-N-N-E. What was the question again?

2 Q The question was regarding Servicios  
3 Notariales, specifically who was required to sign the FSE,  
4 SAR forms?

5 A Redondo, Bart, Rouanne and Barras.

6 Q And where was the president of CIT,  
7 Bart, where was he located?

8 A In Velizy.

9 Q Where's that?

10 A It's a suburb of -- south of Paris.

11 Q Okay. And the president of the mobile  
12 business division, Rouanne, where was he located? Where  
13 was he?

14 A In Velizy.

15 Q And Mr. Barras was the president of  
16 Alcatel Standard; where was he located?

17 A In Paris at the headquarters of the  
18 Alcatel group.

19 Q Do you happen to know, Mr. Sapsizian,  
20 which Alcatel entity was the employer of Mr. Redondo?

21 A No, I don't remember.

22 Q You described Mr. Redondo as the  
23 president of Latin America?

24 A Yes.

25 Q And am I correct that Latin America is

1 not a legal entity within Alcatel?

2 A Yes.

3 Q It's a geographic region?

4 A Yes.

5 Q So you were describing Mr. Redondo as  
6 the president of a geographic region within Alcatel?

7 A Yes.

8 Q And not the president of a legal entity;  
9 correct?

10 A Yes.

11 Q Did anyone in the Alcatel Miami office  
12 report to you?

13 A No. Yeah. I take advantage of this to  
14 specify that I didn't have any of the persons under my  
15 orders connection with this area. Neither in Miami or in  
16 any other country.

17 Q Okay. And who -- during this period of  
18 time when you were involved in bringing forms to Mr.  
19 Redondo for him to sign, who was your direct supervisor?

20 A Within the legal entity that was  
21 employing me, that was paying me, Jean Lailheugue,  
22 L-A-I-L-H-E-U-G-U-E, and it's Jean. Within the  
23 organizational charge I was belonging to Mafille.

24 Q And the first gentleman you mentioned,  
25 I'll call him Jean because I can't pronounce his last

1 name, where was he based?

2 A In Velizy.

3 Q And that's outside Paris, France?

4 A (Through the witness) Yes.

5 Q And Marcel Mafille, where was he based?

6 A (Through the witness) Chile.

7 Q And did you -- within Alcatel, were you  
8 reviewed by your supervisors? Did they perform  
9 performance reviews of you?

10 A Yes.

11 Q And who would do those performance  
12 reviews?

13 A In general it was Jean Lailheugue, and I  
14 believe starting around 2003 I had another supervisor  
15 whose name was Van Den Abel.

16 A (Through the witness) I don't know how  
17 to --

18 A Who's located in Mexico, who represented  
19 a group of the business division located in Latin America.  
20 But in my head, the answer to your question is Jean  
21 Lailheugue.

22 Q Am I correct, Mr. Sapsizian, that you  
23 did not have any reporting responsibilities to Mr.  
24 Redondo?

25 A Correct.

1 Q Am I also correct that your knowledge of  
2 what occurred in the Miami office is based on what you  
3 happened to see when you were there?

4 A Yes.

5 Q And am I also correct that you did not  
6 visit the Miami office on a regular basis but only when  
7 necessary because you thought you had enough forms to  
8 bring to Mr. Redondo?

9 A Yes, yes, correct.

10 Q And that would vary from time to time;  
11 correct?

12 A Yes.

13 Q Do you know where Mr. Redondo is located  
14 now, Mr. Sapsizian?

15 A No.

16 Q Could you tell me the name of the  
17 official from the Instituto Costarricense de Electricidad  
18 with whom you met or who was present at meetings that you  
19 attended?

20 A In general, the meeting was with Mr.  
21 Lobel (phonetic spelling). Are you asking me all the  
22 people that I met with?

23 Q Who -- who you can remember. I'm asking  
24 who you can remember.

25 A The directors of -- the board of

1 directors of the ICO, the deputy general manager of the of  
2 the telecommunications branch.

3 Q And were these individuals -- were all  
4 of them Costa Rican nationals?

5 A (Through the witness) Oui.

6 Q And they were located in Costa Rica, to  
7 your knowledge?

8 A (Through the witness) Oui.

9 Q And Servicios Notariales, which is the  
10 consulting company you referred to, is a Costa Rican  
11 company?

12 A Yes, yes, as far as I know.

13 Q And it's located in Costa Rica?

14 A Yes.

15 Q And the country senior officer during  
16 the time when you were bringing these forms for Mr.  
17 Redondo to review, the country senior officer in Costa  
18 Rica was Edgar Valverde?

19 A Yes.

20 Q And he's a Costa Rican national?

21 A Yes.

22 Q And he was in Costa Rica at the time  
23 that this was going on?

24 A Yes.

25 Q As far as you know, is he still in Costa



1 Rica?

2 A I don't know. I have no idea.

3 Q Have you heard of a company called Cas

4 Consult before?

5 A Yes, I did. I don't know if I still  
6 have.

7 Q Did you use Cas Consult as a company to  
8 receive payments from Servicios Notariales?

9 A I did not create Cas Consult to receive  
10 money from Servicios Notariales, but I received funds from  
11 Servicios Notariales into Cas Consult.

12 Q Am I correct, sir, that the funds you  
13 received from Servicios Notariales were funds that were  
14 paid by Alcatel to Servicios Notariales?

15 A No.

16 Q Am I correct that you did not tell  
17 anyone from Alcatel -- strike that. Am I correct that you  
18 did not tell Alcatel about the funds you received from  
19 Servicios Notariales because you thought if Alcatel knew  
20 you would be fired?

21 A No, I didn't tell Alcatel.

22 Q And is that because you thought if you  
23 told Alcatel you would be fired?

24 A Yes, yes.

25 Q How much did you receive from Servicios

1       **Notariales?**

2       A                   I believe the FBI determined that I  
3       received \$265,000.

4       Q                   Okay. And you agree with the FBI's  
5       assessment?

6       A                   I don't know.

7       Q                   So let me see if I understand. Your  
8       testimony is you don't know how much you received from  
9       Servicios Notariales?

10      A                   I believe it was \$265,000 because when  
11      they seized the account, in the account there was  
12      \$265,000.

13      Q                   Do you deny, sir, that you may have  
14      received as much as \$400,000 from Servicios Notariales?  
15      Do you deny that?

16      A                   Yes, I deny that.

17      Q                   Were you present, Mr. Sapsizian, for  
18      discussions regarding payments to a Costa Rican government  
19      official named Calderon?

20      A                   When?

21      Q                   In the 1990s.

22      A                   Yes.

23      Q                   And who was Mr. Calderon?

24      A                   He was the president of the Republic of  
25      Costa Rica.

1 Q And am I correct that those discussions  
2 that you were present for were in Costa Rica?

3 A Yes.

4 Q And Mr. Calderon is a Costa Rican  
5 national?

6 A (Through the witness) Uh-huh.

7 Q Do you know whether Mr. Calderon is  
8 still in Costa Rica?

9 A No, no idea. Yes, just one note. This  
10 meeting with Calderon took place before 1995. That is  
11 before the reorganization performed by Tchuruk.

12 Q But am I correct that what was discussed  
13 with Mr. Calderon was making payments to him?

14 A No. Excuse me. You're asking if the  
15 meeting took place when Alcatel was paying Calderon?

16 Q No. I'm just asking whether you ever  
17 attended any meetings with Mr. Calderon at which the  
18 subject of payments to Mr. Calderon was discussed?

19 A No.

20 Q Did you ever attend meetings with anyone  
21 at which the subject of payments to Mr. Calderon was  
22 discussed?

23 A Yes.

24 Q And were those meetings in Costa Rica?

25 A Yes.

1 Q And were those discussions with Mr.  
2 Valverde?

3 A No.

4 Q Were those discussions with someone who  
5 was claiming to represent Mr. Calderon?

6 A Yes.

7 Q And was that Mr. Guardia?

8 A Yes.

9 Q And is Mr. Guardia a Costa Rican  
10 national?

11 A Yes.

12 MR. DUGAN: I don't believe I have any  
13 further questions. Thank you.

14 MS. ROY: I have just a few. Can I  
15 borrow someone's mic?

16 VIDEOGRAPHER: Excuse me. This is the  
17 end of Tape No. 3 in the deposition of Christian Sapsizian  
18 to be continued on Tape No. 3. We're off the record at  
19 12:52 p.m.

20 (Whereupon a recess was taken.)

21 VIDEOGRAPHER: This is the beginning of  
22 Tape No. 3 and continued deposition of Christian  
23 Sapsizian. We are on the record at 12:54 p.m.

24 CROSS EXAMINATION:

25 BY MS. ROY

1 Q Good afternoon, Mr. Sapsizian.

2 A (Through the witness) Good afternoon.

3 Q My name is Tammy Roy, and I'm with the  
4 law firm of Cahill, Gordon & Reindel and we represent  
5 Alfredo Redondo in this lawsuit. And I just have a very  
6 few questions about matters you testified to about today.  
7 Specifically I wanted to talk about the meetings where you  
8 went to Miami, and you said you would stop by Miami  
9 between your trips to France and Latin America; is that  
10 correct?

11 A Yes.

12 Q And I believe you said that you thought  
13 that you visited every month to six weeks; is that  
14 accurate?

15 A Yes.

16 Q And over what time period was that?

17 A I believe it was until the time I was  
18 with the area, the beginning of 2003.

19 Q And when did it begin? When did those  
20 meetings begin?

21 A At the arrival of Redondo.

22 Q And do you recall when Mr. Redondo  
23 arrived in Miami?

24 A No.

25 Q Could it have been around June of 2001?

1 A Probably, yes. Probably. I'm not sure  
2 if it was 2002 or 2001.

3 Q And are you certain of your statement  
4 that you met with them -- you went to Miami every month to  
5 six weeks? Is that -- could it be less than that?

6 A Approximately like that, because when I  
7 had enough documents from the CSOs, that's when I used to  
8 go. For just one document, I wouldn't.

9 Q Okay. And the meetings that you  
10 testified to, the three or four meetings where there were  
11 management reviews, do you recall what year those took  
12 place?

13 A Approximately 2002 -- 2001, 2002, 2003.

14 Q And besides the meetings that you've  
15 discussed here today, did you have any other direct  
16 contact with Mr. Redondo?

17 A There were contacts only when Redondo  
18 would visit Paris and also during the sales meetings that  
19 would gather all the CSOs and the business divisions there  
20 were active on Latin America and also the sales meetings  
21 that were chaired by Redondo or Robirosa that gathered  
22 about 100 people. And, in general, these lasted for  
23 several days, in general, up to a week; and during these  
24 meetings, I would meet also with Redondo.

25 Q And in all of your meetings with

1 Redondo, was that in his capacity as president of Latin  
2 America?

3 A Yes.

4 MS. ROY: I have no further questions.

5 MR. WIAND: Okay. I've got a couple  
6 just in response, but real brief.

7 REDIRECT EXAMINATION:

8 BY MR. WIAND

9 Q Mr. Sapsizian, you were asked with  
10 respect to the charges that were filed against you by  
11 Alcatel that you had denied those charges. Do you recall  
12 that?

13 A Yes.

14 Q And they had charged that you had acted  
15 on your own in arranging these payments to foreign  
16 officials; correct?

17 A Yes.

18 Q And that's primary reason you deny their  
19 allegations; correct?

20 A Yes.

21 Q And those allegations that you acted  
22 alone were untrue; is that correct?

23 A Yes, absolutely right.

24 Q With respect to the payments that were  
25 made to Servicios Notariales --

1 A Yes.

2 Q -- how were those payments processed and  
3 how did they take place?

4 MR. DUGAN: Objection to form.

5 A Yes. We saw before how the two types of  
6 forms, the FSE and SAR, were established and approved; and  
7 once these documents were approved and signed, Alcatel  
8 Standard would establish the consulting agreements using a  
9 preestablished contract and adapting it to the conditions  
10 indicated in the FSE and the SARs. In particular, these  
11 consulting agreements contained the consultant concerned,  
12 the address, the number, and the bank information for the  
13 consultant.

14 Once the consulting agreements were signed by the  
15 consultant and Alcatel Standard, a copy of these documents  
16 was sent to the legal entity that would make a payment to  
17 the consultant according to the conditions indicated in  
18 the consulting agreement that had repeated the information  
19 on those two forms, FSE and SAR, we talked about.

20 Once the legal entity received this copy of the  
21 consulting agreement, then the financial department --  
22 okay. Then to simplify, because it was complicated, we're  
23 talking about Alcatel Costa Rica -- CIT for the case of  
24 Costa Rica, then the financial department of the CIT would  
25 fulfill the consulting agreement that had been signed in



1 its name by Alcatel Standard Switzerland.

2 So when the payment conditions of the consultant  
3 agreement indicated that CIT had to make a certain  
4 payment, the financial department of CIT, from what I  
5 recall, will issue a note. I don't remember exactly who  
6 had signed it, but probably the financial director of  
7 Alcatel CIT, the financial director of the business  
8 division, and the head of treasury of Alcatel CIT.  
9 Probably there were other people, but I don't know them.

10 Q Okay.

11 A I specify this because I saw several  
12 times this mechanism was not what I understood, so this  
13 was the mechanism; so once the consulting agreement had  
14 been signed -- so payment of the amounts to the various  
15 consultants was a matter of belonging exclusively to the  
16 financial department and probably also some other people  
17 from Alcatel CIT. Probably not -- maybe, not probably.

18 Q Okay. And those funds that were  
19 authorized by CIT for payment pursuant to the contract  
20 were paid to bank accounts in Miami?

21 MR. DUGAN: Objection.

22 A These were paid to the bank accounts  
23 that were mentioned in the consulting agreements and  
24 therefore on the SAR form.

25 MR. WIAND: Okay. All right. Thank

1 you.

2 COURT REPORTER: One second. Could you  
3 please put your order on the record?

4 MR. WIAND: I would like to have this as  
5 soon as I can get it.

6 MR. DUGAN: And I think, yeah, we would  
7 like to have it on an expedited basis --

8 MR. WIAND: Okay.

9 MR. DUGAN: -- as well.

10 MS. ROY: We would as well. Thank you.

11 MR. WIAND: So get it to me as quick as  
12 you can get it and them, too, and we'll all be happy.

13 MS. ROY: Tomorrow or the next day.

14 MR. WIAND: Tomorrow hopefully.

15 VIDEOGRAPHER: This is the end of Tape  
16 No. 3 and concludes the deposition of Christian Sapsizian  
17 taken on November 30, 2010.

18 (Off the video record.)

19 MR. WIAND: You have the opportunity to  
20 read and sign this if you want; okay?

21 THE WITNESS: I would like to read.

22

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REPORTER'S CERTIFICATE

I HEREBY CERTIFY that the above and foregoing is a true and correct transcript of all the testimony introduced and proceedings had in the taking of the testimony in the above-entitled matter, as shown by my stenotype notes taken by me at the time said testimony was taken.

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Jodie L. Algarin  
Registered Professional Reporter

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SIGNATURE PAGE

TO BE COMPLETED BY DEPONENT:

I, Christian Sapsizian, have read the foregoing pages of my testimony or have had the foregoing pages of my testimony read to me and have noted any changes in form or substance of my testimony together with their respective corrections and the reasons therefore on the following errata sheet(s).

(Signature) \_\_\_\_\_

(Date) \_\_\_\_\_

\*\*\*\*\*

TO BE COMPLETED BY NOTARY PUBLIC:

I, \_\_\_\_\_, a Notary Public in and for the State of \_\_\_\_\_, hereby acknowledge that the above-named deponent personally appeared before me, swore to the truth of the foregoing statements and affixed his/her signature above as his/her own true act and deed.

(Signature) \_\_\_\_\_

(Date) \_\_\_\_\_

My Commission Expires: \_\_\_\_\_ JA

1 TO THE WITNESS: DO NOT WRITE IN TRANSCRIPT EXCEPT TO  
2 SIGN. Please note any word changes/corrections on this  
sheet only. Thank you.

3 TO THE REPORTER: I have read the entire transcript of  
4 my deposition taken on the 30th Day of November, 2010, or  
5 the same has been read to me. I request that the  
6 following changes be entered upon the record for reasons  
indicated. I have signed my name to the signature page  
and authorized you to attach the following changes to the  
original transcript:

7	PAGE	LINE	CORRECTION OR CHANGE & REASON THEREFOR
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23 \_\_\_\_\_  
Today's Date

\_\_\_\_\_  
Christian Sapsizian

24  
25

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