

1 IN THE UNITED STATES DISTRICT COURT
 2 FOR THE SOUTHERN DISTRICT OF FLORIDA
 3 MIAMI DIVISION
 4
 5 FARHAD AZIMA,
 6 Petitioner,
 7 vs.
 8 INSIGHT ANALYSIS AND RESEARCH LLC
 AND SDC-GADOT LLC,
 9 Respondents.

Case No.:
 1:22-MC-20707

14 Videotaped 30(b)(6) Deposition of
 15 SDC-GADOT LLC
 16 by and through its Corporate Representative
 17 AMIT FORLIT
 18 Wednesday, July 20, 2022
 19 11:09 a.m. Israel Daylight Time

25 Reported by: BRENDA MATZOV, CSR NO. 9243
 JULY 20, 2022 - AMIT FORLIT
 30(B)(6) SDC-GADOT LLC

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1 Videoconference 30(b)(6) deposition
 2 of SDC-GADOT LLC, by and through its Corporate
 3 Representative, AMIT FORLIT, taken in the
 4 above-entitled cause pending in the United
 5 States District Court, for the Southern
 6 District of Florida, Miami Division, before
 7 BRENDA MATZOV, CSR NO. 9243, at the David
 8 Intercontinental Hotel, Tel Aviv, Israel,
 9 and simultaneously in the Zoom participants'
 10 remote locations, on Wednesday, the 20th
 11 day of July, 2022, at 11:09 a.m. Israel
 12 Daylight Time.

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1 APPEARANCES (Continued):
 2 ALSO PRESENT (in Israel):
 3 MITCHELL COOPERSMITH, Videographer
 4 HAYA SHAVIT-KEDAR, Hebrew Interpreter
 5 RUCHIE AVITAL, Hebrew Interpreter
 6
 7 ALSO PRESENT (remotely via Zoom):
 8 LESLEY SEMONES, Miller & Chevalier
 9 FREDERICK WILMOT-SMITH, Burlingtons Legal
 10 LUKE HACKETT, Burlingtons Legal
 11 FARHAD AZIMA

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I N D E X

1 WITNESS

2 Amit Forlit

3 (Witness Location: Tel Aviv, Israel)

4

5

6 EXAMINATION PAGE

7 By Mr. Behre 11

8

9 E X H I B I T S

10 NUMBER DESCRIPTION MARKED

11 Exhibit 1 Document Entitled

12 "Subpoena to Produce

13 Documents, Information,

14 or Objects or to Permit

15 Inspection of Premises in

16 a Civil Action," Service

17 Date March 23, 2022

18 (No Bates Number) 45

19 Exhibit 2 Document Entitled

20 "Electronic Articles of

21 Organization for Florida

22 Limited Liability Company,"

23 for SDC-Gadot LLC, Date

24 Filed October 18, 2017,

25 and Related Documents

(No Bates Number) 61

Exhibit 3 Two Affidavits of Amit

Forlit, Dated May 12, 2022,

and June 1, 2022

(No Bates Number) 73

Exhibit 4 Multiple Citibank Bank

Statements for SDC-Gadot

LLC, Multiple Dates

(SDC-GADOT-CITI_00044 to 00147) 114

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Q U E S T I O N S I N S T R U C T E D

2 N O T T O A N S W E R

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E X H I B I T S

1 NUMBER DESCRIPTION MARKED

2 Exhibit 5 Document Entitled "Letter

3 of Engagement," Dated

4 March 1, 2016

5 (No Bates Number) 162

6 Exhibit 6 Multiple Invoices from

7 SDC-Gadot LLC to Page

8 Group ME Ltd. and Page

9 Risk Management DMCC,

10 Multiple Dates

11 (No Bates Number) 165

12 Exhibit 7 Multiple Invoices from

13 Gadot Information Services

14 to PPS Ltd., Multiple Dates

15 (No Bates Number) 172

16 Exhibit 8 WhatsApp Messages between

17 Stuart Page and Amit Forlit

18 (No Bates Number) 175

19 Exhibit 9 E-mail from Mario Ros

20 to "amit@gadot.co" Dated

21 September 7, 2019, Subject:

22 "Citibank"

23 (SDC-GADOT-CITI_00155) 181

24 Exhibit 10 Document Entitled "Project

25 Beech Report - Farhad Azima,"

Dated August 4, 2015

(No Bates Number) 183

Exhibit 11 Document Entitled "Project

Beech - Comprehensive Action

Plan," Dated January 26,

2016

(No Bates Number) 193

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1 WEDNESDAY, JULY 20, 2022

2 11:09 A.M. ISRAEL DAYLIGHT TIME

3

4 THE VIDEOGRAPHER: Today's date

5 is July 20th, 2022. The time on the video

6 monitor is 11:09 a.m.

7 This is the videotaped deposition

8 of Amit Forlit, in the matter of Farhad

9 Azima versus Insight Analysis and Research

10 LLC and SDC-Gadot, being heard in the United

11 States District Court, Southern District

12 of Florida, Case No. 1:22-MC-20707.

13 This videotaped deposition is

14 taking place in Tel Aviv, Israel, as well

15 as parties are attending remotely.

16 Would the counsel present in

17 Tel Aviv please voice-identify themselves

18 and whom they represent.

19 MR. BEHRE: Good morning, Kirby

20 Behre, on behalf of Farhad Azima.

21 MR. BARET: Morning. Elan Baret,

22 on behalf of SDC-Gadot and Insight.

23 MR. HERBERT: Ian Herbert, on

24 behalf of Farhad Azima.

25 THE COURT REPORTER: Dominic?

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1 MR. HOLDEN: Dominic Holden, on
 2 behalf of Farhad Azima.
 3 THE VIDEOGRAPHER: Something is
 4 making noise. I don't --
 5 THE COURT REPORTER: Let's go off
 6 the record for a second.
 7 THE VIDEOGRAPHER: Can we go --
 8 off the record at 11:11.
 9 (Recess from 11:11 a.m. to 11:15 a.m.
 10 Israel Daylight Time.)
 11 THE VIDEOGRAPHER: Back on record
 12 at 11:15.
 13
 14 HAYA SHAVIT-KEDAR
 15 and
 16 RUCHIE AVITAL,
 17 the interpreters, were duly affirmed
 18 to translate from English to Hebrew
 19 and from Hebrew to English.
 20
 21 (The following proceedings were
 22 conducted through the interpreters,
 23 unless otherwise indicated, and
 24 excluding colloquy.)
 25 //

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1 AMIT FORLIT,
 2 called as a witness, was examined
 3 and testified under penalty of
 4 perjury as hereinafter set forth.
 5
 6 EXAMINATION
 7 BY MR. BEHRE:
 8 Q. Good morning, Mr. Forlit.
 9 A. Good morning.
 10 Q. Would you please state your full
 11 name for the record?
 12 A. Amit Forlit.
 13 Q. And how old are you?
 14 A. Soon 55.
 15 Q. And where are you a resident in?
 16 A. In Israel.
 17 Q. What countries are you a citizen
 18 of?
 19 A. Only Israeli citizenship.
 20 Q. So you're here today to testify
 21 on behalf of SDC-Gadot LLC; is that correct?
 22 A. Yes.
 23 Q. And is that a Florida corporation?
 24 A. Yes.
 25 Q. And is that your company?

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1 THE COURT REPORTER: I will ask
 2 counsel to please stipulate that, in lieu
 3 of formally swearing in the witness, the
 4 reporter will ask the witness to acknowledge
 5 that their testimony will be true under the
 6 penalties of perjury, that counsel will not
 7 object to the admissibility of the transcript
 8 based on proceeding in this way, and that
 9 the witness has verified that he is Amit
 10 Forlit.
 11 Counsel, do you agree?
 12 MR. BEHRE: Agreed.
 13 MR. BARET: Agreed.
 14 THE COURT REPORTER: Mr. Forlit,
 15 do you hereby acknowledge that your testimony
 16 will be true under the penalties of perjury
 17 and do you affirm that the testimony you
 18 are about to give in this deposition will
 19 be the truth, the whole truth, and nothing
 20 but the truth?
 21 THE WITNESS: Yes.
 22 //
 23 //
 24 //
 25 //

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1 A. Yes.
 2 Q. And is Insight Analysis and Research
 3 LLC also your company?
 4 A. No.
 5 Q. How about Insight GSIA, is or was
 6 that your company?
 7 A. No.
 8 Q. How about Gadot Information Services,
 9 is that your company?
 10 A. Yes.
 11 Q. Who owns Insight Analysis and Research,
 12 if not you?
 13 A. A gentleman who manages my finances.
 14 His name is Omri Gur Lavie.
 15 Q. And what about Insight GSIA, who
 16 owns that?
 17 A. If I recall, his name is Effi
 18 Lavie.
 19 Q. And do you have any ownership
 20 interest in Insight Analysis and Research
 21 LLC?
 22 A. I don't have an interest in the
 23 ownership. But I am partner to its management.
 24 Q. And what management position do
 25 you hold?

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1 A. This is -- I'm not quite sure
 2 I understand. This is a wallet company.
 3 Almost every decision that is made is
 4 made by me.
 5 Q. A wallet company?
 6 A. The company was established
 7 mainly because there was a problem
 8 transferring monies from Dubai to Israel
 9 at that time. And at the request of
 10 Mr. Page, two companies were established
 11 in the United States to facilitate the
 12 transfer of money.
 13 Q. Okay. Okay. Well, we'll get
 14 a little more into that later.
 15 You know who I am -- right? --
 16 Kirby Behre?
 17 A. "Kin."
 18 Q. And you've known my name for
 19 many years, haven't you?
 20 A. That's correct.
 21 Q. And you know my client Farhad
 22 Azima's name; right?
 23 A. I've heard of him. Yes.
 24 Q. And you've known that name for
 25 many years too; right?

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1 BY MR. BEHRE:
 2 Q. Okay. So in preparation for your
 3 testimony today, you said that you reviewed
 4 some documents; is that correct?
 5 A. Yes.
 6 Q. And what have you reviewed to
 7 prepare for your testimony here today?
 8 A. Affidavits given by Stuart Page.
 9 Q. Okay. Anything else?
 10 A. Bank accounts. Invoices for --
 11 for Stuart Page.
 12 Q. And when you say "bank accounts,"
 13 what are you referring to specifically?
 14 A. I wanted to see when we first
 15 charged for the work concerning Khater
 16 Massaad.
 17 Q. And when you say "the work
 18 regarding Khater Massaad," did that include
 19 anything having to do with Farhad Azima?
 20 A. The name of Farhad Azima came up
 21 throughout all the years the investigation
 22 was being carried out, in a number of
 23 transactions which were suspected of
 24 being illegal that we investigated.
 25 But the client or the representatives

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1 A. Yes.
 2 Q. And when do you think you first
 3 heard the name Farhad Azima?
 4 A. So at the start of the investigation
 5 of Gadot Israel, which is also known as
 6 Gadot Information Services, we learned that
 7 the subject of the investigation was a man
 8 named Dr. Khater Massaad. Khater Massaad
 9 was referred to your firm by your client
 10 Farhad Azima.
 11 Q. And do you recall what year you
 12 learned that name -- the name of Farhad
 13 Azima?
 14 A. Because I reviewed some of the
 15 material in preparation for today, I --
 16 I would say it was in March 2015, early
 17 2015.
 18 Q. And in conjunction with your
 19 investigation of Farhad Azima, was the
 20 name Project Beech used?
 21 MR. BARET: Objection. Form.
 22 THE WITNESS: I have never
 23 investigated Farhad Azima. The
 24 investigation was of Dr. Khater Massaad.
 25 //

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1 of the client, especially at the beginning
 2 of the investigation, said that Farhad
 3 Azima served as a mediator or a go-between
 4 between them and Khater Massaad. And
 5 that's why neither we nor the client were
 6 asked to investigate Farhad Azima -- were
 7 asked not to investigate Farhad Azima.
 8 Q. What's the business of SDC-Gadot
 9 LLC?
 10 A. In Gadot SDC, as well as in Insight,
 11 there's no business activity other than to
 12 serve as a conduit to transfer money to Gadot
 13 Israel.
 14 And the issue or the matter was
 15 because Stuart Page, according to him, received
 16 the money directly in a bank account in Dubai
 17 from the ruler Ras Al Khaimah -- RAK.
 18 THE INTERPRETER: I'm sorry?
 19 THE WITNESS: (Comment in Hebrew.)
 20 THE COURT REPORTER: It's here.
 21 It's here.
 22 THE INTERPRETER: RAK. Okay.
 23 Yeah. Okay.
 24 THE WITNESS: "The head of the
 25 tent." This is what -- the meaning.

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1 THE INTERPRETER: "The head of
 2 the tent?"
 3 THE WITNESS: Ras Al Khaimah
 4 is the "head of the tent."
 5 THE INTERPRETER: Okay.
 6 THE WITNESS: And in order to
 7 transfer the money to us, he had to transfer
 8 it first to Hong Kong and then to transfer
 9 it to Israel. In the early years, we
 10 experienced very serious problems in the
 11 transfer of the money. And, consequently,
 12 Stuart asked or -- either Stuart or his
 13 person in charge of finance to simplify
 14 and streamline it by opening companies
 15 in the United States.
 16 BY MR. BEHRE:
 17 Q. And what was or is the business
 18 of Gadot here in Israel?
 19 A. Are you referring to the Israeli
 20 company Gadot Israel or the Florida company?
 21 Q. The Israeli company, which I
 22 understand you're now saying was using
 23 the U.S. entity to transmit funds.
 24 A. Gadot Israel is a firm for crisis
 25 management that uses the collection of

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1 and from investigations. For example,
 2 by participating in chat rooms and
 3 investigations of pretext and --
 4 pretext and monitoring, all this data
 5 that is collected is analyzed by analysts.
 6 Q. And by "pretext," do you mean
 7 misrepresentations by individuals about
 8 who they are to get information?
 9 Correct?
 10 A. So every -- so as far as I'm
 11 concerned, pretext -- every -- every case
 12 should be judged separately. But it could
 13 involve hanging out in a bar and overhearing
 14 a conversation or talking to someone.
 15 Anything -- I consider anything
 16 where you don't introduce yourself and say
 17 I am so-and-so and I am investigating is
 18 what I would consider pretext.
 19 Q. And you also used the term
 20 "monitoring."
 21 What is it you're monitoring?
 22 A. (Comment in Hebrew.)
 23 THE INTERPRETER: "Surveillance"?
 24 THE WITNESS: "Surveillance."
 25 THE INTERPRETER: Okay.

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1 data, data analysis, and recommendations
 2 for actions to be taken by their customers.
 3 Q. And in your role with Gadot, has
 4 Gadot ever had in its possession stolen
 5 data, including stolen e-mails?
 6 A. The answer to that question is
 7 a little bit problematic. Because the
 8 analysts of Gadot sometimes use information
 9 that has been leaked to various websites
 10 such as WikiLeaks. Sometimes e-mails
 11 that were stolen have been published.
 12 So to say that we don't use
 13 stolen e-mails in our data collection
 14 or as part of our data collection, that
 15 would not be accurate. But I can say --
 16 but I can say that Gadot Israel does
 17 not steal data and does not do anything
 18 criminal in its activities involving --
 19 in its work here in Israel.
 20 Q. When you mentioned analysts
 21 at Gadot, what specifically is the role
 22 that analysts play in the company?
 23 A. In many cases, we get from
 24 customers too and from open sources --
 25 also from collecting from open sources

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1 THE WITNESS: (Comment in Hebrew.)
 2 THE INTERPRETER: The word should
 3 have been "surveillance."
 4 BY MR. BEHRE:
 5 Q. And "surveillance," you mean
 6 human --
 7 THE INTERPRETER: Physical
 8 surveillance -- I'm sorry -- he -- he --
 9 he explained.
 10 He said: "Physical surveillance."
 11 MR. BEHRE: Okay. Thank you.
 12 THE INTERPRETER: Actually
 13 surveilling someone.
 14 BY MR. BEHRE:
 15 Q. Following someone without them
 16 knowing it, is that an example of surveillance?
 17 A. Yes. That's an example.
 18 Q. So just to jump back, you said
 19 you looked at some bank statements; is that
 20 correct?
 21 A. My own.
 22 Q. Okay. And by your own, which
 23 company are you talking about?
 24 A. Gadot SDC and Insight.
 25 Q. And which banks are those?

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1 A. Insight in Bank of America and
 2 Gadot at Citibank.
 3 Q. Okay. And in addition, you
 4 mentioned reviewing invoices in preparation
 5 for your testimony.
 6 Who are those invoices to and from?
 7 A. The invoices from Insight and from
 8 Gadot in the U.S. to Stuart Page in the Beech
 9 case.
 10 Q. And could you spell "Beech," please,
 11 for the record?
 12 A. Sometimes we got it wrong. But I
 13 think it's B-e-e-c-h.
 14 Q. (Not translated.) So the intent
 15 is "beach" like the ocean and not "beech"
 16 like the tree?
 17 A. (In English.) No.
 18 (Translated.) It was Stuart Page
 19 who chose the name.
 20 (Last question translated.)
 21 THE WITNESS: I think his initial
 22 intention was to the tree. But we might
 23 have got the spelling wrong.
 24 BY MR. BEHRE:
 25 Q. In addition to the bank statements

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1 Throughout the entire investigation,
 2 we would call the ruler "the boss." That
 3 was his nickname. But my actual customer
 4 was Stuart Page.
 5 Q. Okay. And you said that the
 6 customer dictated the policy of not
 7 preserving documents; correct?
 8 A. That's what Stuart Page told
 9 me. I never met the boss.
 10 Q. And, again, by "boss," you mean
 11 the ruler; right?
 12 A. Yes.
 13 Q. And what were the documents that
 14 were created but were not retained?
 15 A. Approximately every month, but
 16 not always, and based on the findings of
 17 the investigation, we would produce a report.
 18 The report had an executive summary
 19 at the beginning. And this was followed by a
 20 breakdown of the findings of the investigation.
 21 And we would send these reports using the
 22 method that Stuart described quite accurately
 23 in his affidavit to Stuart.
 24 Stuart always asked, from the
 25 beginning, that we leave the report in

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1 and the invoices, what else did you review
 2 to prepare for your testimony?
 3 A. I spoke to my attorneys about
 4 the legal proceedings we've been involved
 5 in until now.
 6 Q. Yeah. I'm just asking you about
 7 documents now, not -- not discussions.
 8 A. In this case, there was a security
 9 protocol that was dictated by the customer
 10 not to preserve any documentation in the
 11 case.
 12 Q. And who was the customer?
 13 A. RAK.
 14 Q. And was Stuart Page a customer?
 15 A. Stuart Page asked to meet me --
 16 I think it was March 2015.
 17 And he told me that the ruler
 18 wanted him to -- wanted to investigate
 19 the illegal activities of Khater Massaad.
 20 And according to what Stuart told me, his
 21 work was directly vis-a-vis the ruler. And
 22 the payment he received, according to what
 23 Stuart said, was also -- also came directly
 24 from the account of the ruler rather than
 25 some company.

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1 an open format for two reasons. The first
 2 one was that he said that our English was
 3 beneath contempt. And he would also add
 4 sections to the report involving investigations
 5 that he did that had nothing to do with us.
 6 Q. Did you draft or write any portion
 7 of those reports?
 8 A. The report was prepared by the
 9 staff of analysts. I would review the
 10 report before it was sent out, sometimes
 11 make corrections or changes.
 12 Q. And when you say the "staff of
 13 analysts," who were those people specifically?
 14 A. This was a staff of people who
 15 worked for Gadot. And for reasons of
 16 privacy, I will not state their names.
 17 Q. And what are the reasons of
 18 privacy that you can't disclose the
 19 employees of your company?
 20 A. First and foremost, this
 21 investigation relates to Gadot U.S.A.
 22 and to Insight. And these employees
 23 are not employees of Gadot or Insight.
 24 And, secondly, some of them
 25 have security clearances here in Israel.

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1 Some of them came from the various security
 2 systems, Israeli security systems.
 3 Q. Well, as I understand your
 4 testimony, the payments that were made
 5 to SDC-Gadot were payments for the work
 6 of Gadot here in Israel; correct?
 7 A. Correct.
 8 Q. And, therefore, the work of
 9 SDC-Gadot directly relates to Gadot?
 10 A. Yes.
 11 Q. So I'm asking you for the names
 12 of the employees who prepared the report --
 13 or reports I should say.
 14 A. I understood your question. But
 15 I will not answer that question.
 16 Q. Okay. Well, that's not a -- it --
 17 it's not a valid reason not to answer.
 18 MR. BEHRE: And if you want to
 19 interject anything -- I mean, we can --
 20 MR. BARET: Well --
 21 MR. BEHRE: -- go to the Court.
 22 But --
 23 MR. BARET: Well, I -- I disagree
 24 with your analysis, with all due respect.
 25 I don't think Gadot --

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1 BY MR. BEHRE:
 2 Q. So in addition to the bank
 3 statements, the invoices, did you look
 4 at anything else to prepare for today?
 5 A. No.
 6 Q. Well, you indicated before we
 7 started that you had documents in front
 8 of you -- correct? -- that included Stuart
 9 Page's declaration or declarations?
 10 A. Yes. These are Stuart Page's
 11 declarations. And these are lists which
 12 I made for myself to assist myself in
 13 reconstructing the proceedings that we've
 14 been through so far.
 15 Q. (Not translated.) Could you
 16 tell us what statements you have in front
 17 of you by date --
 18 THE INTERPRETER: Statements?
 19 BY MR. BEHRE:
 20 Q. (Not translated.) -- and title?
 21 THE INTERPRETER: Statements?
 22 MR. BEHRE: Witness statements.
 23 Affidavits.
 24 (Pending question translated.)
 25 THE WITNESS: I have Stuart's

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1 THE INTERPRETER: (Comment in
 2 Hebrew.)
 3 MR. BARET: Gadot SDC did not
 4 have any employees. And Gadot -- and the
 5 subject of this deposition is for Gadot SDC,
 6 not for Gadot Israel. So he -- he decided
 7 not to answer. And you can -- you can make
 8 a note of that.
 9 MR. BEHRE: Are you instructing
 10 him not to answer?
 11 MR. BARET: I'm not instructing
 12 him anything. He made a decision. And
 13 I'm not instructing him to answer. [sic]
 14 MR. BEHRE: Okay.
 15 MR. BARET: You didn't hear me --
 16 MR. BEHRE: In addition --
 17 MR. BARET: I'm sorry. You didn't
 18 hear me instructing him not to answer; right?
 19 Just so we're clear. I'm not instructing
 20 him not to answer.
 21 MR. BEHRE: But you're not
 22 instructing him to answer?
 23 MR. BARET: He's -- he's a
 24 grown man. If he doesn't want to answer,
 25 that's his choice.

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1 affidavit from the 7th of January, 2022.
 2 And an additional one by Stuart from the
 3 7th of February.
 4 I also -- I also had the affidavit
 5 of Majdi Halabi. But I don't seem to find
 6 it here. I probably left it in my office.
 7 BY MR. BEHRE:
 8 Q. So in front of you you have two
 9 affidavits of Stuart Page; right?
 10 A. Yes.
 11 Q. And you also have some handwritten
 12 notes you made; correct?
 13 A. Correct.
 14 Q. And those are one page or more?
 15 A. More. Eleven.
 16 Q. And in addition to the things
 17 we've just discussed, is there anything
 18 else document-wise you looked at to
 19 prepare for your testimony?
 20 A. No.
 21 Q. Have you ever reviewed any of
 22 the pleadings in Farhad Azima's U -- U.K.
 23 case?
 24 A. (Translated.) Not -- not in
 25 the last few days. But I am familiar

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1 with these proceedings, with this claim
2 or this action that Farhad Azima is
3 conducting versus Nick Del Rosso --
4 (In English.) NDR.
5 (Translated.) -- NDR.

6 Q. And so you've looked at -- at
7 pleadings involving the Azima versus Del
8 Rosso case in the United States?

9 A. Yes. I've been through the
10 pleadings. And many times journalists
11 from Reuters approached me. And I think
12 that I'm pretty well familiar with these
13 proceedings.

14 Q. And when Reuters approached you,
15 did you speak with them?

16 A. Yes.

17 Q. And what was the name of the
18 reporter?

19 A. Raphael Satter.

20 MR. BEHRE: I think that's
21 Satter, S-a-t-t-e-r.

22 THE INTERPRETER: Satter?

23 MR. BEHRE: Satter. Yeah.

24 THE INTERPRETER: Satter.

25 THE WITNESS: It's like Beech

1 A. In my opinion, I haven't spoken
2 to her in about two years.

3 Q. And when's the last time you
4 communicated with her, again, text, e-mail,
5 or messaging app?

6 A. The same answer.

7 Q. What about Neil Gerard, did you
8 talk to him in preparation for your testimony
9 here today?

10 A. In my view, the last time I spoke
11 to Neil Gerard was in that meeting that
12 I described in -- which took place in
13 Switzerland.

14 Q. And when's the last time you
15 communicated with Neil Gerard? And I
16 can keep repeating it. But text? E-mail?

17 A. First of all, throughout the --
18 all the -- all these years, I did not have
19 a direct connection or direct communication
20 with Neil Gerard.

21 My opinion -- my evaluation is
22 that, ever since the first trial that took
23 place between Farhad Azima and the client
24 in London, I did not speak to him, I did
25 not meet him, I did not correspond with him.

1 is both a tree and a seashore.

2 BY MR. BEHRE:

3 Q. In preparation for your testimony
4 here today, have you spoken to anyone to
5 gain information about which you can
6 testify?

7 A. No.

8 Q. Have you spoken to Stuart Page
9 about your testimony here today?

10 A. No.

11 Q. When's the last time you spoke
12 with Stuart Page?

13 A. I estimate that it's been about
14 seven, eight months since we last spoke.

15 Q. When did you last communicate
16 with him?

17 And by that, I mean text or
18 e-mail or messaging app.

19 A. I can check that and provide
20 an accurate reply.

21 Q. Just a rough estimate?

22 A. Seven, eight months.

23 Q. Okay. What about his assistant
24 Caroline Timberlake, when's the last time
25 you spoke with her?

1 Q. But there was a time you met with
2 Neil Gerard at Dechert's offices in London;
3 right?

4 A. All along the time that this
5 procedure is being run, I believe I've
6 been in Dechert's office once or twice
7 in London. It can be checked in the
8 log-in of Dechert, because it's been
9 verified.

10 Beyond my meetings with Neil
11 at Dechert, I believe that, in the last
12 four or five years of conducting this
13 case, I met Neil perhaps another ten
14 times. I have never met Neil without
15 Stuart's presence. And that's it as
16 far as Neil is concerned.

17 Q. Now, you indicated the Dechert
18 log-in system for visitors, it's been
19 verified.

20 What did you mean by that?

21 A. When you come to visit their
22 offices -- when you come to visit their
23 offices, you have to present some document
24 of identification. And then they issue for
25 you a magnetic card, which you use throughout

1 your visit to open the doors, to open the
 2 elevator -- I don't remember.
 3 Q. And you've also visited with Neil
 4 Gerard at your apartment at the Metropolitan
 5 Hotel in London too; correct?
 6 A. (Translated.) Once or twice,
 7 a few times -- I don't remember exactly --
 8 Neil came to meetings which were held in
 9 the apartment. But these meetings as well
 10 were attended by Stuart Page.
 11 And this -- and this apartment
 12 is a room in a hotel. It's not as if I
 13 have an apartment there.
 14 (In English.) I wish I had.
 15 Q. It would be a very expensive
 16 apartment.
 17 A. (In English.) Also to rent.
 18 Q. Yeah. And, finally, have you
 19 ever visited Gerard at his home?
 20 A. Never.
 21 Q. Now, what about Jamie Buchanan,
 22 did you speak with him about your testimony
 23 here today?
 24 A. No.
 25 Q. When's the last time you spoke

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1 A. In all my 55 years of existence,
 2 I have never spoken to the ruler nor met
 3 him.
 4 Q. Have you ever communicated with
 5 him in text, e-mail, or messaging?
 6 A. Never. Never.
 7 Q. How about Amir Handjani, did you
 8 talk to him to prepare for your testimony?
 9 A. Same answer as for the ruler.
 10 In all my 55 years of existence,
 11 I never met him. I never spoke to him.
 12 I never communicated. I don't know him.
 13 Q. And did you attend the trial
 14 of Farhad Azima in London in 2019?
 15 A. No.
 16 Q. Were you in London at the time?
 17 A. I don't recall. I can check
 18 that. I don't think so.
 19 Q. Did you meet with any of the
 20 parties on behalf of RAK who were at that
 21 trial at the time they were in that trial?
 22 A. I don't think so. I don't think
 23 so.
 24 I believe I did meet with Stuart,
 25 because I had a very close contact with --

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1 with him?
 2 A. I estimate something like
 3 ten months. That's my estimate. Even
 4 before I became aware that there's some
 5 proceedings here against me.
 6 Q. And when's the last time you
 7 communicated with him?
 8 A. After I learned about the
 9 testimony that Stuart gave, I -- I
 10 communicated with him not directly,
 11 but via his attorney.
 12 Q. And who is his attorney?
 13 A. A woman -- a woman by the
 14 name of Sue or something like that,
 15 in England, in --
 16 Q. In --
 17 A. -- the U.K.
 18 THE INTERPRETER: "A women
 19 by the name of Sue or something like
 20 that in the U.K."
 21 BY MR. BEHRE:
 22 Q. What about the ruler, when's
 23 the last time you spoke with him?
 24 And did you talk to him to
 25 prepare for your testimony today?

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1 very close connection with Stuart. I don't
 2 think it was at the time of the proceedings.
 3 I -- I have something to add.
 4 I went over a few more documents
 5 in preparation to this testimony, which I
 6 forgot to mention before. I took out from
 7 the Ministry of Interior all the dates of
 8 my exits and entries into the country in
 9 order to refresh my memory as to these
 10 visits or trips.
 11 Q. Exits and entries from which
 12 country?
 13 A. Only from Israel. Because I
 14 possess an Israeli passport. That's
 15 the only -- the only thing that could
 16 be checked.
 17 Q. And why did you look at that
 18 information to prepare?
 19 A. Because, when I read the affidavit
 20 by Majdi Halabi, I did not remember some of
 21 the meetings that he described as me being
 22 in attendance. So I wanted to check whether
 23 at all I had been present in the places as
 24 he was describing it.
 25 Q. And did you receive a printout

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1 from the Israeli Ministry about your travel?
 2 A. Yes. Every citizen can do that.
 3 Q. And do you have a copy of that
 4 with you today?
 5 A. I have it in the mail. I can
 6 have it printed if you want.
 7 Q. Okay. We'd appreciate that.
 8 A. My attorney will provide you
 9 that in reference to the specific dates.
 10 Q. (Not translated.) Now, going
 11 back to the people you might have spoken
 12 with to prepare for your testimony, did
 13 you -- did you speak with anyone from
 14 Karv Communications, such as Andrew
 15 Frank, before you --
 16 THE INTERPRETER: From Karv?
 17 BY MR. BEHRE:
 18 Q. (Not translated.) -- testified
 19 here today?
 20 THE INTERPRETER: Karv -- Karv
 21 Communications?
 22 MR. BEHRE: Karv, K-a-r-v.
 23 THE INTERPRETER: Okay.
 24 (Pending question translated.)
 25 THE WITNESS: Just like my

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1 A. It was a telephone conversation.
 2 And I believe it was close to the date
 3 that he had submitted his affidavit. And
 4 since then, I had no communication with
 5 him whatsoever.
 6 Q. (Partially translated.) Okay.
 7 How about the U.K. lawyer, Lucy Ward, did
 8 you speak with her before you testified
 9 here today?
 10 THE COURT REPORTER: "Lucy."
 11 THE INTERPRETER: What's her
 12 name? Lucy Ward. Lucy Ward.
 13 (Remainder of pending question
 14 translated.)
 15 THE WITNESS: I don't know this
 16 lady. And I've never spoken to her.
 17 BY MR. BEHRE:
 18 Q. Have you ever communicated with
 19 her in any other way?
 20 A. No.
 21 Q. How about Nicholas Del Rosso,
 22 did you speak with him before you
 23 testified here today?
 24 A. Same answer.
 25 In all my 55 years of existence,

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1 previous answer, I have never met him.
 2 I don't know him. I have never communicated
 3 with him.
 4 BY MR. BEHRE:
 5 Q. And how about David Hughes?
 6 A. I have met David Hughes when he
 7 was working at Dechert. And I believe that
 8 the last time I met him was in that meeting
 9 in Cyprus, which is described in Stuart's
 10 affidavit. I have never communicated with
 11 him directly, neither before nor after, and
 12 not indirectly either.
 13 Q. Okay. And how about Majdi Halabi?
 14 A. The last time I spoke to Majdi
 15 Halabi was after he submitted his affidavit.
 16 After I have learned about his
 17 affidavit from the Reuters reporter, I
 18 called him. And he refuted, he denied
 19 that he had provided such an affidavit.
 20 And when I saw -- when I saw it, I -- I
 21 cut my connections with him. And since
 22 then, I have not spoken to him.
 23 Q. When's the last time you
 24 communicated with him by text, e-mail,
 25 or messaging service?

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1 never met, never heard, never spoken, don't
 2 know.
 3 Q. But you've certainly heard of him;
 4 right?
 5 A. Yes.
 6 Now, seriously, in the beginning
 7 of the investigation, I learned that Nick
 8 Del Rosso was recruited and he's working
 9 on the case in parallel to us but on
 10 different -- other issues.
 11 I remember that Stuart Page
 12 was deeply offended that Nick Del Rosso
 13 is being employed. And he was told that
 14 Nick's employment had been suspended.
 15 And the next time we encountered
 16 the name of Nick Del Rosso, we were told
 17 that he was making the connection between
 18 a company that was studying the materials
 19 leaked from Farhad Azima and the customer,
 20 the client.
 21 THE COURT REPORTER: "And" or
 22 "in"?
 23 THE INTERPRETER: "And the client."
 24 BY MR. BEHRE:
 25 Q. The connection between a company

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1 that was?
 2 A. He made a connection to a company
 3 that was analyzing materials, the materials
 4 that had been leaked from Farhad Azima.
 5 Q. And what was the name of that
 6 company?
 7 A. I -- I don't remember. Once
 8 again, all my information comes from
 9 Stuart.
 10 Q. What about an investigator by
 11 the name of Craig Thomas, did you speak
 12 with him to prepare for your testimony
 13 here today?
 14 A. I don't even have the faintest
 15 clue who this person is. Until now, I
 16 recognize the names. But this one ...
 17 Q. What about Patrick Grayson?
 18 A. I heard about him. Never spoken
 19 to him, never met him, never communicated
 20 with him.
 21 Q. Was he involved in Project Beech,
 22 if you know?
 23 A. No. Not to my knowledge.
 24 Q. Did you speak with Paul Robinson
 25 to prepare for your testimony here today?

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1 Q. You -- you received -- or I should
 2 say S -- SDC-Gadot received a subpoena for
 3 documents; correct?
 4 A. After a long time after servicing
 5 the documents to somebody in Florida, I
 6 learned that they had been requested to
 7 provide documents.
 8 MR. BEHRE: After servicing the
 9 documents to somebody in Florida?
 10 THE INTERPRETER: After -- after
 11 the servicing -- serving the -- the -- the
 12 subpoena, I imagine. Serving, not servicing.
 13 Serving. Serving. Sorry. Sorry. Serving.
 14 MR. BEHRE: Okay. Let me just
 15 ask the question again.
 16 THE INTERPRETER: Okay.
 17 BY MR. BEHRE:
 18 Q. Do you recall receiving a subpoena
 19 for documents from SDC-Gadot in conjunction
 20 with the Florida case?
 21 A. Yes.
 22 Q. And are you aware that, in response
 23 to that, no documents were produced?
 24 A. I am aware that my bank said --
 25 did send them the documents -- my documents

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1 A. I heard about Paul Robinson from
 2 Stuart Page, even in the course of the
 3 meetings held by Stuart Page with Robinson.
 4 But I don't know him. I haven't spoken
 5 to him. And that's it.
 6 Q. In preparation for your testimony
 7 here today, have you spoken to anyone else
 8 affiliated with Dechert, the law firm?
 9 A. No.
 10 Q. (Not translated.) And how about
 11 anyone from Stewarts Law, the law firm in
 12 the U.K. that represents RAK?
 13 A. "Lo."
 14 (Pending question translated.)
 15 THE WITNESS: No.
 16 MR. BEHRE: RAK is all -- all
 17 caps, R-A-K.
 18 THE WITNESS: (Comment in Hebrew.)
 19 THE INTERPRETER: No. No.
 20 THE COURT REPORTER: He wants to
 21 smoke an electronic cigarette.
 22 BY MR. BEHRE:
 23 Q. It's not good for your health.
 24 We're not going to do that here.
 25 A. No, this is good for my health.

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1 that he was requested -- that the bank was
 2 requested to submit. And immediately after
 3 learning about the subpoena, I recruited
 4 the services of my attorney here in order
 5 to defend myself in respect to the substance
 6 of the subpoena. And only recently did I
 7 determine what I am supposed to produce and
 8 what I'm -- I'm not.
 9 Q. But you would agree that, in
 10 preparation for your testimony here today,
 11 you reviewed documents that would be required
 12 to be produced under that subpoena; correct?
 13 A. Okay. In the first subpoena,
 14 they required documents connected to the
 15 American companies and to the connection
 16 to -- the connection to Stuart Page in
 17 the connection of the investigation of
 18 Farhad Azima. And since there was no
 19 investigation against Farhad Azima, or
 20 of Farhad Azima, my initial interpreting
 21 was that I have no documents to submit,
 22 since I did not investigate Farhad Azima.
 23 But pretty soon, they started to
 24 submit more and more requests to the Court,
 25 which go well beyond the initial request.

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1 So to the best of my understanding,
2 we submitted an opposition, an objection
3 to these requests. And, finally, the --
4 the agreement was that in -- following
5 the initial -- the first subpoena, I
6 would be deposed here in Israel.

7 And, once again, I will say
8 that I have no connection. I have
9 never investigated Farhad Azima.

10 (Exhibit 1 marked.)

11 BY MR. BEHRE:

12 Q. I'd like to show you --

13 MR. BEHRE: Do you have a copy
14 for counsel?

15 BY MR. BEHRE:

16 Q. I'd like to show you what we've
17 marked as exhibit --

18 MR. BEHRE: Do you have a binder
19 clip or something? Do you have one? Thank
20 you. Yeah.

21 BY MR. BEHRE:

22 Q. Showing you what's been marked --
23 pre-marked as Exhibit No. 1. That's a copy
24 of the subpoena that I believe was served
25 on SDC-Gadot LLC for documents.

1 talking about the subpoena, not the
2 documents in response to the subpoena;
3 right?

4 A. Yes. That's correct.

5 Q. (Translated.) And if you
6 would look, please, at page -- page 8
7 of 39. So if you look at the number
8 in the upper right-hand corner, page 8.

9 (Not translated.) And just
10 directing your attention to paragraph
11 21, it describes the scope of the
12 subpoena as covering not just Farhad
13 Azima but also others, including
14 Khater Massaad.

15 Do you see that?

16 A. Yes.

17 Q. (Partially translated.) And
18 the documents that you've indicated you've
19 reviewed in preparation for your testimony
20 included SDC-Gadot's bank records, as well
21 as invoices; right?

22 A. Yes.

23 Q. And those --

24 THE COURT REPORTER: Let her
25 translate.

1 Could you take a look at that
2 and see if you've seen that before?

3 A. (Examining.) I -- I don't
4 remember.

5 But I do recall that, at some
6 stage, the gentleman whose names -- whose
7 name appears here -- I think it's Shimon
8 Goldenberg [sic] -- is a person I don't
9 know personally, by the way -- he called
10 and he said that he had received a lot
11 of documents and that we should come and
12 see them. He said he had been trying
13 to e-mail us the documents but that the
14 e-mail had bounced.

15 And when I corrected him --
16 because he had written ".com" instead
17 of ".co.il" -- the -- the documents
18 arrived.

19 In actual fact, the first
20 time I -- I received the documents
21 was a long time after they had been
22 initially sent. I think my attorney
23 related to this in one of his responses
24 to the Court.

25 Q. And by "the documents," you're

1 BY MR. BEHRE:

2 Q. And those would be responsive
3 to the subpoena, wouldn't they?

4 A. That's correct.

5 Q. And in addition, you indicated
6 you reviewed other documents as well;
7 correct?

8 A. Bank statements.

9 Q. And what about -- what about
10 the corporate records of SDC-Gadot, did
11 you look at those before you testified?

12 A. No.

13 Q. And by that, I'm referring to
14 the -- the documentation you file with
15 the Florida Secretary of State every
16 year or so.

17 A. I did not review them.

18 Q. And you would agree, wouldn't
19 you, that they would be responsive to
20 this subpoena as well; right?

21 A. (Comment in Hebrew.)

22 MR. BARET: Just -- just for the
23 record, you have those documents. You --
24 you provided it to us. Would you like us
25 to send it back to you? Because the only --

1 other than some of these documents that you
2 provided to us, there is no records, for
3 the record.

4 MR. BEHRE: I don't -- I don't --
5 I don't know if that's true or not.

6 MR. BARET: Oh. So I'm telling
7 you he doesn't have any records. So nothing
8 was produced because -- nothing was produced
9 because there are no records other than what
10 you already have.

11 MR. BEHRE: Well --

12 MR. BARET: But if you want
13 us to produce those records to you, even
14 though you have them, which is Sunday's
15 (phonetic) record, we can do that.

16 MR. BEHRE: I don't know if
17 they're the same as what I've got or
18 not. He indicated he has bank records.
19 He indicated he has invoices.

20 MR. BARET: Only what --

21 MR. BEHRE: I don't see --

22 MR. BARET: -- was produced --

23 MR. BEHRE: -- those.

24 MR. BARET: -- to us by you.

25 So the bank -- actually, you have

1 very well.

2 BY MR. BEHRE:

3 Q. Well, just because you assume
4 we have something doesn't mean you're
5 not obligated to produce them if they're
6 in your possession.

7 A. So I apologize. And I will
8 review, once again, what I have.

9 MR. BARET: I -- I don't think
10 bank records were requested in the subpoena.

11 Can you please direct me where
12 you are requesting bank records?

13 MR. BEHRE: Well, I'm not
14 testifying, so no.

15 MR. BARET: No, so I'm just --
16 for the record, the subpoena you -- you --

17 MR. BEHRE: It's --

18 MR. BARET: -- are showing --

19 MR. BEHRE: -- all records regarding
20 the company, which would include bank records,
21 tax records, for example.

22 BY MR. BEHRE:

23 Q. Do -- does SDC-Gadot file any
24 taxes in the U.S.?

25 A. It filed returns.

1 more bank records than what he does. Because
2 you got the subpoena from the bank. And,
3 actually, some of the records we've got is
4 from whatever you produced and received by
5 issuing a subpoena to Bank of America and
6 Citibank.

7 THE WITNESS: (Comment in Hebrew.)

8 THE COURT REPORTER: Wait. Wait.
9 She has to translate the --

10 THE INTERPRETER: I have to --

11 THE COURT REPORTER: -- last answer.

12 THE INTERPRETER: I have to --

13 His answer was: "I'm not especially
14 proficient in the procedural matters."

15 THE WITNESS: Our bank accounts
16 were closed in August or September of 2021.
17 And we don't have access to the bank.

18 So the subpoena -- the -- the
19 subpoena that you're referring to is much
20 more comprehensive than what we have because
21 we only kept documents in a sporadic fashion.

22 And regarding the invoices for
23 Stuart Page, I would assume -- I assume
24 that you have copies of them from Stuart
25 Page, because he's cooperating with you

1 Q. And where do they file those --
2 where does the company file those tax
3 returns?

4 A. I have to check. But I would
5 guess it's in Florida.

6 Q. And those would be responsive
7 to this subpoena, wouldn't they?

8 A. I'm not sure. I just have --
9 I have to go back and check.

10 Q. (Not translated.) And Ari Propis
11 is the accountant for SDC-Gadot; is that
12 right?

13 THE INTERPRETER: R.E.?

14 MR. BEHRE: Ari, A-r-i. Propis.

15 THE INTERPRETER: Propis.

16 MR. BEHRE: P-r-o-p-i-s.

17 THE WITNESS: No.

18 BY MR. BEHRE:

19 Q. What is his role, if any, with
20 regard to SDC-Gadot?

21 A. Ari Propis has no position
22 whatsoever in SDC-Gadot. He just liaised
23 for us and connected us so we could open
24 the bank account.

25 Q. Who prepared the company's tax

1 returns?
 2 A. There is an accountant. I'd
 3 have to ask the financial person. I
 4 don't remember his name.
 5 Q. And who's the financial person
 6 you'd have to ask that of?
 7 A. Omri.
 8 Q. Who's Omri?
 9 A. Omri Gur Lavie. He's our finance
 10 person.
 11 Q. And does SDC-Gadot pay taxes to
 12 the U.S. Government as best you know?
 13 A. I -- I know that we filed returns
 14 and that all income and expenses were reported
 15 in the jurisdictions in which we had to do
 16 so. Whether taxes were or were not paid,
 17 I would have to check.
 18 Q. (Not translated.) And who keeps
 19 the business expenses for the company?
 20 THE INTERPRETER: What do you
 21 mean by "keeps"? Records?
 22 MR. BEHRE: Keeps the business
 23 expense records.
 24 THE INTERPRETER: Who records.
 25 Okay.

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1 You mean like opening a bank account?
 2 Q. Any sorts of filings or forms
 3 or applications or anything submitted to
 4 a bank.
 5 A. So the only bank that we actually
 6 banked with in America was Citibank. We
 7 tried to work with Chase Manhattan. But
 8 it didn't work out. So we may have filed
 9 some forms there at one point, but -- with
 10 Chase Manhattan.
 11 Q. Chase Manhattan refused to open
 12 an account for you?
 13 A. No. They did open an account.
 14 I don't recall exactly why -- there was
 15 some kind of limitations or something.
 16 But we just -- it wasn't convenient for
 17 us to work with them.
 18 Q. (Not translated.) Have you
 19 ever had any bank account frozen in
 20 the U.S.?
 21 A. No.
 22 Q. (Not translated.) Has any
 23 U.S. Government body ever tried to
 24 obtain information about your bank
 25 accounts, as best you know?

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1 (Pending question translated.)
 2 THE WITNESS: The accountant.
 3 BY MR. BEHRE:
 4 Q. And the accountant is who?
 5 Gur Lavie?
 6 A. If you give me a few minutes --
 7 it's a U.S. CPA. He's a U.S. CPA that
 8 works from Israel. If you give me a few
 9 minutes, I can check on my phone and --
 10 and I'll get back to you with that.
 11 Q. But it's not Mr. Gur Lavie? It's
 12 somebody else?
 13 A. He's the financial director. But
 14 he doesn't work vis-a-vis the authorities.
 15 There's an accountant, and that's his job.
 16 I'm the one that authorizes all expenses.
 17 Q. Are there any other documents
 18 that are filed on behalf of SDC-Gadot
 19 with any Government agency that you
 20 know of?
 21 A. No.
 22 Q. Are there any filings that
 23 SDC-Gadot makes with any banking authority
 24 that you know of in the U.S.?
 25 A. What do you mean by "documents"?

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1 A. (In English.) No.
 2 (Translated.) No.
 3 Q. (Not translated.) So in the --
 4 in the document subpoena that you have
 5 in front of you, Exhibit No. 1, it asks
 6 in -- on page 9 of 39 -- so the numbering
 7 is in the upper right-hand corner.
 8 Under 1.a, the -- it asks for
 9 all reports.
 10 Do you see that?
 11 A. Yes.
 12 Q. And are those the reports you
 13 referenced as having not been retained?
 14 A. No, we have no reports on Azima,
 15 because we didn't do any reports on Azima.
 16 Q. So it is your testimony that there
 17 was no report that mentioned Farhad Azima?
 18 A. No. In my opinion, there were
 19 reports that mentioned Azima -- Farhad
 20 Azima, not as the subject of an investigation,
 21 but as someone whose name came up in the
 22 investigation. And as I said earlier, no
 23 reports were preserved. So everything that
 24 I'm saying now about this is from memory.
 25 Q. So is it your testimony that the

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1 reports that mentioned Azima didn't reflect
 2 any investigation by your company of Azima?
 3 A. My company did not investigate
 4 Farhad Azima. So my company investigated
 5 Dr. Khater Massaad.
 6 In some of the transactions that
 7 Khater Massaad was involved in, other people
 8 were involved, like members of the republican
 9 guard in -- Revolutionary Guard in Iran,
 10 like other people that were involved in
 11 these transactions. And their names were
 12 mentioned. And Farhad Azima's name came
 13 up in some of the transactions.
 14 Q. (Not translated.) Did you ever
 15 use any human intelligence resources to
 16 obtain information about Farhad Azima?
 17 A. We -- some of the sources
 18 included human intelligence sources.
 19 Some of the sources that involved human
 20 intelligence mentioned the name Farhad
 21 Azima in -- in the context of the
 22 investigation into Khater Massaad.
 23 The first source in this case
 24 told us that Farhad Azima brought Khater
 25 Massaad to your firm to represent him.

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1 You can -- you can answer.
 2 THE WITNESS: I don't want to
 3 disclose the source.
 4 BY MR. BEHRE:
 5 Q. (Not translated.) I appreciate
 6 you don't want to. But this is a legal
 7 proceeding. And you're required to disclose
 8 it. And if it's -- if you refuse to do it,
 9 we'll have to go to the Court and seek the
 10 Court's approval to require that disclosure.
 11 And that will require you to come back.
 12 A. There was a gentleman who presented
 13 himself as a member of the PR staff of your
 14 firm who told the story in a -- kind of a
 15 friendly social context.
 16 Q. And who was the person with the
 17 PR firm?
 18 A. I don't recall his name.
 19 Q. And was the PR person at my firm
 20 or someone that was hired by my firm?
 21 A. I don't recall.
 22 Q. The -- the subpoena for documents
 23 also asks you for an engagement letter
 24 relating to Mr. or -- Mr. Azima or the
 25 project.

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1 Q. And so your source was a source
 2 close to Farhad Azima; correct?
 3 A. It -- it would be more correct
 4 to say he was close to your firm.
 5 Q. And who was that source?
 6 A. I'm sorry. I can't divulge that.
 7 Q. And on what basis will you not
 8 divulge that?
 9 A. Based on privilege.
 10 THE INTERPRETER: I don't know
 11 if "privilege" is the right word to use.
 12 I think "privilege" is only attorney-client.
 13 "But based on privilege of the
 14 source or maintaining the privacy of the
 15 source."
 16 BY MR. BEHRE:
 17 Q. (Not translated.) Well, I don't --
 18 I don't think that's a valid basis. And
 19 I'd ask and instruct the witness to answer.
 20 MR. BEHRE: Counsel?
 21 MR. BARET: You can do whatever
 22 you want.
 23 THE WITNESS: "Ma"?
 24 MR. BARET: Do you want to
 25 disclose the source?

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1 Do you see that?
 2 A. We never had an engagement
 3 letter with Stuart.
 4 Q. (Not translated.) It's your
 5 testimony you've never had an engagement
 6 letter with Stuart Page?
 7 A. To the best of my recollection,
 8 we did not have an engagement letter with
 9 Stuart.
 10 (Comment in Hebrew.)
 11 THE COURT REPORTER: Ruchie.
 12 MR. BARET: Can we have a short
 13 break?
 14 THE INTERPRETER: "When are we" --
 15 MR. BARET: He needs a cigarette --
 16 THE INTERPRETER: "Are we going
 17 to have a smoking break?"
 18 MR. BARET: -- and a bathroom
 19 break.
 20 MR. BEHRE: We can have an
 21 e-cigarette break right now. That would
 22 be fine.
 23 MR. BARET: All right. So 15?
 24 THE INTERPRETER: Do we have to
 25 keep working --

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1 MR. BARET: 10?
 2 THE INTERPRETER: -- if we're not --
 3 MR. BARET: 10, 15 minutes, it's
 4 good?
 5 MR. BEHRE: Yeah. Does he have
 6 to go all the way downstairs? So probably.
 7 THE WITNESS: No.
 8 MR. BARET: I don't know. Is
 9 there a balcony?
 10 MR. BEHRE: We better go off the
 11 record for that discussion.
 12 MR. BARET: Is there a --
 13 THE COURT REPORTER: One moment.
 14 MR. BEHRE: 10 minutes.
 15 THE COURT REPORTER: One moment.
 16 THE VIDEOGRAPHER: Going off the
 17 record at 12:38.
 18 (Recess from 12:38 p.m. to 1:00 p.m.
 19 Israel Daylight Time.)
 20 THE VIDEOGRAPHER: Back on record
 21 at 1:00 o'clock.
 22 (Exhibit 2 marked.)
 23 BY MR. BEHRE:
 24 Q. I'd like to next show you what
 25 we've marked as Exhibit No. 2 and see if

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1 you can identify what these are.
 2 For the record, it's a collection
 3 of corporate records from the State of
 4 Florida regarding your company SDC-Gadot.
 5 A. (Examining.)
 6 Q. Have you had a chance to look at
 7 those documents?
 8 A. Yes, now.
 9 Q. And are they the corporate records
 10 for STD -- SDC-Gadot LLC from the State of
 11 Florida?
 12 A. It seems so. Yes.
 13 Q. (Not translated.) And for the
 14 record, the first document is the Articles
 15 of Organization for SDC-Gadot, filed on
 16 October 18th, 2017.
 17 A. (In English.) Okay.
 18 Q. The next document contained in
 19 this exhibit is the annual report filed
 20 on April 29, 2018.
 21 The next exhibit --
 22 A. (In English.) Okay.
 23 (Translated.) Okay.
 24 Q. The next exhibit is the annual
 25 report filed on January 21st, 2019.

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1 Do you see that?
 2 A. Yes.
 3 Q. And next is the annual report
 4 for SDC-Gadot filed on April 11th, 2020.
 5 Do you see that?
 6 A. (In English.) Okay.
 7 (Translated.) Okay.
 8 Q. And the next one is the annual
 9 report for SDC-Gadot filed on February
 10 3rd, 2021.
 11 Do you see that?
 12 A. Yes. They're pretty well --
 13 Q. And then finally --
 14 A. -- organized.
 15 Q. (Not translated.) And then,
 16 finally, do you see the annual report that
 17 was filed for SD -- SDC-Gadot on January
 18 27th, 2022?
 19 THE INTERPRETER: 27? January --
 20 MR. BEHRE: Yes.
 21 THE INTERPRETER: -- 27?
 22 MR. BEHRE: January 27, 2022.
 23 (Pending question translated.)
 24 THE WITNESS: Okay. Yes.
 25 //

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1 BY MR. BEHRE:
 2 Q. So this is the articles of
 3 incorporation [sic] filed in 2017 and
 4 the annual reports up to this year 2022;
 5 right?
 6 A. Okay.
 7 Q. Looking at the Articles of
 8 incorporation -- or of -- of Organization --
 9 apologies -- which is the first page
 10 of the exhibit, it indicates a mailing
 11 address in Miami, Florida.
 12 Do you see that?
 13 A. Yes.
 14 Q. And whose address is that?
 15 A. I imagine that this is the agent
 16 through which we set up the company, because
 17 we had to provide a -- an address, a local
 18 address.
 19 Q. And do you know who lives at the --
 20 this address?
 21 A. No.
 22 Q. And if you look at the second
 23 page of this exhibit -- or I'm sorry --
 24 the second page of this document, the
 25 Articles of Organization for October 18,

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1 2017, there's an electronic signature
 2 affixed to it.
 3 Do you see that?
 4 A. Aah, yes.
 5 Q. And that electronic signature
 6 purports to be yours; correct?
 7 MR. BARET: Here. (Indicating.)
 8 The back of the page. It just says:
 9 "Amit Forlit."
 10 THE WITNESS: I'm looking for it.
 11 MR. BARET: The second page.
 12 THE WITNESS: (Comment in Hebrew.)
 13 It's not a manual signature, not
 14 a handwritten signature.
 15 BY MR. BEHRE:
 16 Q. Right.
 17 It's an electronic signature.
 18 A. I don't recall. But it would
 19 seem so.
 20 Q. So do you -- do you see the page
 21 that I'm asking about? It's -- turn to the
 22 page that has the exhibit sticker on it.
 23 MR. BARET: This one. (Indicating.)
 24 The -- the back of this page.
 25 //

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1 BY MR. BEHRE:
 2 Q. And flip it over.
 3 A. Aah. "Po."
 4 Q. And it indicates that your
 5 electronic signature was affixed to
 6 this document; correct?
 7 A. Yes.
 8 Q. And did you electronically
 9 sign this document?
 10 A. I assume I did. I do not recall.
 11 Q. Okay. And this document was filed
 12 electronically with the State of Florida;
 13 correct?
 14 A. Correct.
 15 Q. Now, going to the first annual
 16 report dated April 29, 2018.
 17 Do you see that?
 18 A. Yes.
 19 Q. And it indicates on the signature
 20 line -- again, electronically signed -- that
 21 you signed as the CEO of the company.
 22 Is that correct?
 23 A. Yes.
 24 Q. And if you go to the next one
 25 from January 21st, 2019, again -- again,

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1 you electronically signed here, indicating
 2 that you are the, quote, "Owner," end
 3 quote --
 4 A. (In English.) Okay. "Kin."
 5 Q. -- of the company; correct?
 6 A. Okay. Yes.
 7 Q. And did all -- were all those
 8 documents filed electronically with the
 9 State of Florida, as best you know?
 10 A. Yes.
 11 Q. And did you authorize the
 12 submission of all these documents on
 13 behalf of SDC-Gadot LLC in Florida?
 14 A. I assume I did.
 15 Q. And it -- the -- the first
 16 page indicates -- that is, the Article
 17 [sic] of Organization indicates that
 18 your registered agent in the State of
 19 Florida is Shimon Goldberger; is that
 20 correct?
 21 A. I assume it is.
 22 Q. Did you hire Mr. Goldberger
 23 and his company SRSI Management, Inc.,
 24 to represent SDC-Gadot in Florida?
 25 A. I don't recall such a thing.

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1 Q. Do you know who Mr. Goldberger
 2 is?
 3 A. Only recently, when he made
 4 contact with us in order to send us the
 5 subpoena, I have learned of his existence.
 6 To the best of my knowledge, we did not
 7 hire him and we did not pay him. We used
 8 his address when setting up the company.
 9 Q. And when you signed electronically
 10 the Articles of Organization, it indicates
 11 on the document you electronically signed
 12 that your registered agent was Shimon
 13 Goldberger. And he too affixed an
 14 electronic signature.
 15 Do you see that?
 16 A. I see it. But I simply do not
 17 remember.
 18 Q. And looking at the annual report
 19 from April 29, 2018, the current principal
 20 place of business has changed. And now
 21 it indicates an address in New York.
 22 Do you see that?
 23 A. Yes.
 24 Q. And the address is West 210
 25 89th Street in New York City; correct?

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1 A. Yes.

2 Q. And in -- in one place says

3 Apartment 1K. And in another place,

4 it says apartment K1.

5 Do you know which is correct?

6 A. I believe it to be the same.

7 Q. Who lives at that address?

8 A. A friend of mine.

9 Q. What's your friend's name?

10 A. Elad Lev Ran.

11 Q. Could you spell the last name?

12 A. L-e-v, dash, R-a-n.

13 THE INTERPRETER: No. "Revach."

14 "Space."

15 THE WITNESS: For -- simply for

16 the purpose of receiving mail. Because,

17 once again, I do not know what was the

18 first address. So we changed the address

19 so, when the bank would send documents,

20 they would arrive.

21 BY MR. BEHRE:

22 Q. And, for example, where did the

23 Citibank records get mailed to?

24 A. As far as Citibank is concerned,

25 mostly they would send a debit card. But

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1 the rest of the documents was usually sent

2 via the application, the app.

3 Q. And did they send those -- did

4 they send the debit cards to New York or

5 to Miami?

6 A. No. They sent it to Israel.

7 I had a fraud event with my card.

8 So I canceled the card. And they sent me

9 a new card, which they sent to Israel.

10 Q. And the fraud on the card was

11 for a debit card?

12 A. Yes.

13 Q. Who actually used those debit

14 cards during the life of this account at

15 Citibank?

16 A. I did.

17 Q. Did anyone else use those cards?

18 A. With the exception of the fraud

19 case --

20 Q. Yes.

21 A. -- nobody else.

22 Q. So all the purchases, then, that

23 would be indicated in the bank statements

24 for Citi that were made on the debit card

25 would have been your personal charges;

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1 correct?

2 A. These are not personal expenses.

3 These are company expenses.

4 Q. (Not translated.) And so when

5 you purchased a Porsche in Pennsylvania,

6 was that a business expense or a personal

7 expense?

8 THE INTERPRETER: When you acquired

9 what? Sorry.

10 MR. BEHRE: Porsche.

11 THE INTERPRETER: Porsche, the car?

12 (Pending question translated.)

13 THE WITNESS: I never bought a

14 Porsche in Pennsylvania.

15 BY MR. BEHRE:

16 Q. Okay. We'll get to that.

17 What e-mail addresses were

18 associated with SDC-Gadot, if any?

19 A. I believe "amit001@me.com."

20 Q. And in addition, did you ever

21 use "amit@gadot.com"?

22 A. No. No. I used "amit@gadot.co"

23 [sic] not ".com."

24 Q. Did anyone else associated with

25 SDC-Gadot use a e-mail address that ended

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1 with "@gadot.co"?

2 A. I believe no.

3 Q. Did you receive an e-mail from

4 Mr. Goldberger, attempting to resign as

5 your registered agent?

6 A. Could be. I don't recall.

7 Q. Do you recall he threatened to

8 resign?

9 A. I -- I remember he sent something

10 that he was being pestered by all these

11 subpoenas that are being sent to him. And

12 he -- he asked us to put a stop to it.

13 But since we did not receive them,

14 we did not know what to answer.

15 I understood belatedly that what

16 he had written was "com" instead of "co"

17 and that's why we did not get these mails.

18 Q. Now, during the course of this

19 litigation in Florida, you've submitted

20 two affidavits; is that correct?

21 A. I assume yes.

22 Q. And one of those affidavits was

23 signed by you on May 12th, 2022. And the

24 second was signed by you on June 1st, 2022.

25 Do you recall that?

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1 A. Yes.
 2 (Exhibit 3 marked.)
 3 BY MR. BEHRE:
 4 Q. I'd like to next show you what's
 5 been marked as Exhibit No. 3.
 6 MR. BEHRE: Do we have a stapler
 7 by any chance?
 8 THE COURT REPORTER: Moshe, go off.
 9 THE VIDEOGRAPHER: Off the record
 10 at 1:19.
 11 (Recess from 1:19 p.m. to 1:21 p.m.
 12 Israel Daylight Time.)
 13 THE VIDEOGRAPHER: Back on the
 14 record at 1:21.
 15 BY MR. BEHRE:
 16 Q. So looking at Exhibit 3 -- and
 17 when I say Exhibit 3, I'm talking about
 18 the sticker that says Exhibit 3. And,
 19 unfortunately, the document happens to
 20 have typed on it "Exhibit 2," which is
 21 from the court case. So apologies for
 22 that confusion.
 23 But this is Exhibit 3.
 24 A. (Examining.) Okay.
 25 Q. Are those the two affidavits

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1 Q. Have you ever resided in the
 2 United States?
 3 A. No.
 4 Q. Have you ever purchased a
 5 vacation home in the United States?
 6 A. No.
 7 Q. Have you ever attempted to
 8 purchase a vacation home in the United
 9 States?
 10 A. No.
 11 Q. Did you ever form an LLC to
 12 purchase a vacation home in the United
 13 States?
 14 A. No. I bought once a caravan,
 15 an RV.
 16 Q. Did you ever form an LLC with
 17 your wife in an effort to buy a vacation
 18 home somewhere in the United States?
 19 A. (Translated.) I set up an LLC
 20 with my wife in order to buy a caravan,
 21 not --
 22 (In English.) "RV."
 23 (Translated.) -- not a vacation
 24 home. An RV.
 25 (In English.) Recreational vehicle.

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1 that you submitted to the Court in Florida?
 2 A. Yes.
 3 Q. And were each of those affidavits
 4 filed electronically, as indicated in the
 5 top of the doc -- of each affidavit?
 6 A. I assume they did.
 7 Q. Directing your attention to the
 8 first affidavit that you signed on May the
 9 12th, 2022 -- so it's the second page of
 10 the exhibit.
 11 A. Okay.
 12 Q. And it indicates in the second
 13 paragraph -- numbered paragraph:
 14 "I do not reside in the State
 15 of Florida."
 16 A. Correct.
 17 Q. And it says:
 18 "I do not reside in the United
 19 States."
 20 Do you see that?
 21 A. Yes.
 22 Q. Have you ever resided in the
 23 State of Florida?
 24 A. Only as a tourist. I never
 25 resided there.

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1 Q. What was the last part? Sorry.
 2 THE INTERPRETER: "An RV."
 3 THE WITNESS: RV. Rec --
 4 THE INTERPRETER: Recreational --
 5 THE WITNESS: Recreational --
 6 THE INTERPRETER: -- vehicle.
 7 THE WITNESS: -- vehicle.
 8 THE INTERPRETER: An RV.
 9 BY MR. BEHRE:
 10 Q. And when -- when was that?
 11 A. I believe it was in 2012. And
 12 then when we -- maybe 20 -- or maybe 2014.
 13 THE INTERPRETER: He adds.
 14 THE WITNESS: And when we divorced
 15 in 20 -- the end of 2017, beginning of
 16 2018, as part of the divorce arrangement,
 17 I transferred to her the ownership of the
 18 RV.
 19 BY MR. BEHRE:
 20 Q. And while you owned the RV, where
 21 was it stored when it was not being used?
 22 A. It was in use about one month
 23 or one month and a half per year. And
 24 we would store it in the place that we
 25 would be -- we would be arriving at.

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1 Q. And what state was that?
 2 A. I believe we visit -- visited
 3 something like 30 states, like all over
 4 the place.
 5 Q. Was it ever stored in the State
 6 of Florida?
 7 A. I don't believe so.
 8 Q. Where would --
 9 A. Because we were more in -- on the
 10 west.
 11 Q. And where -- from what state were
 12 the license plates obtained from?
 13 A. I don't -- I honestly don't remember.
 14 Q. In what state did you purchase the
 15 RV?
 16 A. New Jersey.
 17 Q. Now, you indicate in the third
 18 paragraph of this affidavit dated May 12,
 19 2022, that SDC-Gadot LLC:
 20 "Has not conducted business in
 21 the State of Florida."
 22 Do you see that?
 23 A. Yes.
 24 Q. Is that an accurate statement?
 25 A. I believe it is.

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1 since the closure of the account about
 2 a year and a half ago, maybe even a
 3 little before that -- sadly, since the
 4 beginning of COVID -- I do not recall
 5 any activity after that.
 6 Q. When is the last time that
 7 SDC-Gadot conducted business?
 8 A. I believe -- I believe before
 9 the summer of 2021. 2020 maybe.
 10 Q. And what business was conducted
 11 in 2020?
 12 A. I think collecting funds from
 13 somebody who was owing me money. But it
 14 was not an activity per se.
 15 Q. So you would agree receiving
 16 funds is conducting business; correct?
 17 A. It's a -- it's a business
 18 transaction of the account, not of the
 19 company. The company did not carry out
 20 any -- any activity.
 21 Q. Well, the statement says that
 22 the company "has not conducted any business
 23 in years," which clearly suggests that it
 24 had conducted business at some point.
 25 So what does it mean when you

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1 Q. And when you say you -- it --
 2 the company "has not conducted business
 3 in the State of Florida," what do you mean?
 4 A. That we did not do any business
 5 in the State of Florida. We -- we did not
 6 carry out any investigation. And we did
 7 not conduct any business activity.
 8 Q. Did you engage in any financial
 9 transactions that involve the State of
 10 Florida?
 11 A. Please define if -- what you mean
 12 by the "State of Florida."
 13 Like, if somebody in Florida made
 14 a payment to me, does this mean that it
 15 involves the State of Florida?
 16 Q. Did you give or receive any funds
 17 from an entity or person in the State of
 18 Florida?
 19 A. Possibly. I do not remember.
 20 Q. And you indicate, at the end
 21 of paragraph 3, that SDC-Gadot:
 22 "Has not conducted any business
 23 in years."
 24 Correct?
 25 A. Well, what I mean by that is,

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1 add to your statement "in years"?
 2 A. When I say "in years," we're
 3 already talking about two years and more.
 4 When COVID started, we practically stopped
 5 any operations, also in Gadot in Israel.
 6 And my meaning is that there was no work
 7 carried -- carried out. If there were
 8 some collecting of funds or debts, in
 9 my opinion, this is not operations.
 10 Q. Looking next at the second
 11 affidavit, which you executed on June
 12 the 1st, 2022.
 13 Do you have that in front of
 14 you?
 15 A. Yes.
 16 Q. You indicate, in paragraph 3,
 17 you had not been in the State of Florida
 18 since 2017; correct?
 19 A. Correct.
 20 Q. And what were you doing in
 21 Florida in 2017?
 22 A. I opened a bank account.
 23 Q. And which bank account was that?
 24 A. The account in Citibank, which
 25 is the bank account of SDC-Gadot.

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1 Q. And you came to Florida in 2017
2 solely for the purpose of opening that
3 account or for some other reason?

4 A. I came as a tourist. I visited
5 some friends. And then I took a flight
6 to D.C.

7 Q. And what did you do when you
8 arrived in D.C.?

9 A. I don't recall. I assume that
10 I had business meetings.

11 Q. During that trip in 2017, did
12 you meet with anyone from the Dechert law
13 firm?

14 A. No. I didn't meet anyone in there.
15 The only person I knew from Dechert was Neil.
16 And I didn't meet him in the United States.

17 Q. (Not translated.) Well, earlier
18 you indicated you knew David Hughes as well,
19 who was at Dechert; right?

20 A. David Hughes worked at Stewarts
21 Law before that, before I knew him.

22 Q. Well, where did he work first,
23 Dechert or Stewarts Law?

24 A. When I met him, he was working
25 at Stewarts Law. And I was told that,

1 Q. Are you -- do you have a license
2 to be a private investigator?

3 A. There are two levels. I'm --
4 I have a private investigator's license.
5 And I have a license to run an -- an
6 investigating firm. I don't actually
7 use them here in Israel.

8 But I have those documents
9 from the Justice Department or Ministry.
10 I don't think I've even renewed those
11 licenses.

12 Q. (Not translated.) Has your
13 license ever been suspended or revoked
14 by the Government of Israel?

15 A. Yes. Yes. I don't even recall
16 why they suspended it. But then they
17 reinstated.

18 Q. And do you recall what year
19 it was suspended?

20 A. 2005 or '6.

21 Q. And did it relate to your
22 involvement in smuggling someone out
23 of the State of Israel who was wanted
24 by the Israeli Government?

25 A. I was accused of that. There

1 previously, he had worked at Dechert.

2 Q. (Not translated.) Okay. Now,
3 in paragraph 3 as well, you say the last
4 time you were in the United States was 2019.

5 What were you doing in the U.S.
6 in 2019?

7 A. I was on a trip in the Yosemite
8 National Park and went up to Canada. I
9 was with my partner.

10 Q. You indicate, in paragraph 6,
11 that you are an investigator and you
12 were hired by Stuart Page to, quote:

13 "Run intelligence gathering
14 services."

15 End quote.

16 Do you see that?

17 A. I'm looking -- looking for it.

18 Yes, I see it.

19 Q. Are you considered a private
20 investigator?

21 A. Among other things, yes.

22 Q. Are you registered as a private
23 investigator here in Israel?

24 A. I'm registered. And I have a --
25 the -- a firm certificate.

1 was a trial. I was not found -- I was
2 not convicted. And so my license was
3 restored.

4 Q. So that was the reason your
5 license was suspended?

6 A. I think so. But I don't
7 recall exactly.

8 Q. Who was the person you were
9 accused of smuggling?

10 MR. BARET: Excuse me. How
11 does that relate to SDC-Gadot Florida,
12 which is the purpose of this deposition?

13 MR. BEHRE: It's right in
14 his affidavit. He's claiming he's an
15 investigator. And I'm probing about
16 his license to be --

17 MR. BARET: This is --

18 MR. BEHRE: -- an investigator.

19 MR. BARET: -- not -- this wasn't
20 for SDC Gadot. This affidavit was -- was --
21 was provided to the Court as an objection
22 to deposing personally. It wasn't --

23 MR. BEHRE: It doesn't matter.
24 It's the same case.

25 MR. BARET: No, it's not.

1 I mean, there is objection to
2 his deposition, which the Court has not
3 ruled yet. We objected for his deposition.
4 And since you came from Washington, I'm --
5 I'm -- I'm sitting quietly and I'm trying
6 not to interfere. But it turns out that
7 you are deposing Amit Forlit as Amit Forlit,
8 which we objected to this deposition. And
9 the Court hasn't ruled yet.

10 And we're here for the purposes
11 of investigating or taking deposition of
12 a representative of SDC-Gadot Florida.

13 MR. BEHRE: Correct.

14 MR. BARET: Now, it happens to
15 be Amit Forlit. But the Court has not
16 ruled as to our objection to depose him
17 personally. And it turns out that this
18 deposition turns to be taking a deposition
19 in his personal capacity, which we are
20 objecting and -- object to. So --

21 MR. BEHRE: In the affidavit,
22 paragraph 5, he specifically references:

23 "SDC-Gadot LLC."

24 In paragraph 6, he says:

25 "I am an investigator."

1 you, we came here; right?

2 A. First of all, I truly appreciate
3 the fact that you came here. As far as
4 the deposition is concerned, we submitted
5 an objection, which has not been answered
6 yet. And like the other people present,
7 we could have done it by Zoom.

8 Q. But it wouldn't have been as
9 intimate as this is.

10 A. That's the reason why I'm happy
11 that you came here.

12 Q. Well, thank you. I'm glad to
13 be here.

14 Whose idea was it to call the
15 project that's the subject of SDG-Gadot
16 [sic] Project Beech?

17 A. Stuart Page idea. [sic]

18 Q. And Stuart Page uses the term
19 "SIGINT."

20 Did SDC-Gadot use SIGINT?

21 A. I can -- I can state the various
22 methods that -- that SDC-Gadot used. But,
23 you know, SIGINT is a -- quite an umbrella
24 term that comes from -- from the field of
25 defense. And on top of that, Gadot SDC did

1 MR. BARET: This is -- this
2 affidavit was provided in our objection
3 to depose him personally. It wasn't --

4 MR. BEHRE: I'm -- I'm --

5 MR. BARET: We never objected to
6 deposition of SDC-Gadot. We're not objecting
7 to SDC-Gadot. It's a Florida corporation.
8 He happens to be a representative of that
9 corporation. And I request that your
10 questioning will be related to SDC-Gadot
11 and not to Amit personally, as the Court
12 hasn't ruled yet as to your right to depose
13 him personally. If the Court will --

14 MR. BEHRE: Okay. I hear your
15 objection.

16 MR. BARET: -- rules that he can
17 be deposed, then we'll -- we'll come here
18 again. And you can depose Amit Forlit in
19 his personal capacity.

20 BY MR. BEHRE:

21 Q. (Not translated.) Sir, you're
22 aware that the Court ordered you to be
23 deposed in Florida; correct?

24 A. (In English.) Yes.

25 Q. And you know, as a courtesy to

1 not use anything. It operated Gadot Israel.

2 Q. (Not translated.) Well, it did
3 operate Gadot Israel, didn't it?

4 Because it facilitated the money
5 that was owed to Gadot Israel and that money
6 ran through Florida; right?

7 A. (Comment in Hebrew.)

8 THE INTERPRETER: (Comment in
9 Hebrew.)

10 May I? I'm not sure you got
11 correctly the --

12 THE COURT REPORTER: No, just --

13 THE INTERPRETER: -- translation.

14 You -- he said that SDC-Gadot was
15 operating Gadot Israel.

16 MR. BEHRE: Uh-huh.

17 THE INTERPRETER: Okay? Okay.

18 (Pending question translated.)

19 THE WITNESS: Yes.

20 BY MR. BEHRE:

21 Q. Did any of the payments that
22 SDC-Gadot received relate to Gadot's
23 use of subcontractors who were located
24 in the United States?

25 A. Not that I can recall.

1 Q. Did you have any subcontractors
 2 in the United States?
 3 A. Not subcontractors. I had vendors
 4 that I paid, not --
 5 Q. And did you have --
 6 A. -- subcontractors.
 7 Q. Did you have vendors located
 8 in the United States?
 9 A. I had vendors in the United
 10 States. But they are not connected to
 11 the case related to Stuart Page.
 12 Q. When you were drafting the
 13 reports that you spoke about earlier
 14 today, did you have an e-mail account
 15 you shared with Stuart Page's assistant
 16 Caroline in which you created the reports?
 17 A. As part of transferring the
 18 reports, we had something that was called
 19 a DLB, a dead letter box. The reports
 20 were sent through that account. But I
 21 don't recall who drafted them.
 22 Q. But they were drafted by someone
 23 under your direction; correct?
 24 A. I would assume that yes.
 25 Because part of our expertise

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1 where there was a lack of cooperation
 2 with the Emirates, for example, and
 3 other authorities. And after all,
 4 the boss is the State.
 5 So later we discovered that
 6 there were other parties who were harming
 7 or trying to harm the investigation and
 8 the boss. And that's why we set up these
 9 security protocols.
 10 Q. And part of the objective of
 11 your work was to prevent those who you
 12 thought was harming RAK from doing harm;
 13 right?
 14 A. So from -- the investigation
 15 concentrated or focused on the criminal
 16 activities carried out by Khater Massaad,
 17 both business -- in business and in politics,
 18 such as, for example, assisting Hezbollah
 19 or violating the sanctions on Iran and
 20 he -- and the use -- his use of various
 21 infrastructures belonging to RAK, the
 22 State, in order to commit these illegal
 23 activities, criminal activities.
 24 In -- among other things, we
 25 provided protection. And our work included

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1 was to set the security protocols, because
 2 we were experts in cyber-security. So
 3 that was why we did it in this way, why
 4 it was decided to do it in this way.
 5 Q. So if I understand the way the
 6 dead letter box works is that you share
 7 an e-mail account. And you or someone
 8 at your direction writes something in
 9 the e-mail. And then Caroline, on the
 10 other side, accesses that same e-mail
 11 account, because she knows the password
 12 too. And then Stuart Page gets the report.
 13 A. Basically, yes. But it's much
 14 more complicated than that. And there's
 15 much more security surrounding it.
 16 Q. And why was there so much secrecy
 17 and security about these reports?
 18 A. So starting from the beginning
 19 of the investigation, one of the greatest
 20 concerns of the boss was that Khater
 21 Massaad had joined forces with someone
 22 else or other people in his family and
 23 they wanted to topple him.
 24 Throughout the investigation,
 25 there were bizarre things that occurred

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1 protecting -- creating protocols in order
 2 to project -- protect the entire environment.
 3 The boss was very, very concerned. And he --
 4 he refused even to talk on the telephone
 5 because he was so concerned.
 6 Q. And SDC-Gadot received payments
 7 that were, at least in part, for the
 8 preparation of those reports; correct?
 9 A. (Translated.) So SDC-Gadot
 10 received payment for the whole Beech
 11 case. And that included the security
 12 protocols and --
 13 (In English.) The reports.
 14 (Translated.) -- the reports.
 15 Q. And it also included payments
 16 for the work that was reflected in those
 17 reports; right?
 18 A. Yes.
 19 Q. Now, as part of your work for
 20 which you were paid through SDC-Gadot,
 21 you attended two meetings in Cyprus;
 22 correct?
 23 A. I held more than two meetings
 24 in Cyprus.
 25 Q. Okay. How many were there?

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1 A. So in this -- I don't recall
 2 how many exactly.
 3 But in this case, I held meetings
 4 about once a month with Stuart and also
 5 sometimes with James and Neil, but must --
 6 much less frequently than with Stuart.
 7 The meetings were held on an as-needed
 8 basis, not on a specific day or month
 9 or something like that.
 10 Cyprus was simply a convenient
 11 location because they could stop there
 12 on their way from Dubai to England. And
 13 for me, it's just a very short flight.
 14 Q. So approximately how many meetings
 15 were held in Cyprus involving your work
 16 for Stuart Page?
 17 A. I can estimate about five to
 18 ten meetings were held with Stuart in
 19 Cyprus.
 20 Q. And how many of those were
 21 attended by Neil Gerard?
 22 A. I think just one.
 23 Q. How many were held with David
 24 Hughes?
 25 A. The same one.

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1 Q. How about with Jamie Buchanan?
 2 A. I think, with Jamie Buchanan, we
 3 met at least three times over that period
 4 in Cyprus.
 5 Q. How about Majdi Halabi, how many
 6 times did you meet with him in Cyprus?
 7 A. Once.
 8 Q. And did you meet in Cyprus with
 9 at least some of these people on November
 10 21st, 2018?
 11 A. There was one meeting --
 12 MR. BARET: What -- what's the
 13 date of the -- the meeting you're referring
 14 to?
 15 MR. BEHRE: November 21st, 2018.
 16 THE INTERPRETER: So I'll just --
 17 "There was one meeting in Cyprus.
 18 It was a -- a team meeting that -- and
 19 Majdi was present for a short part of it,
 20 the part that related to him. I -- if I --
 21 if I could see Majdi's affidavit, I would
 22 be able to tell you exactly when it was."
 23 BY MR. BEHRE:
 24 Q. So Majdi Halabi's affidavit was
 25 accurate on this point?

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1 A. (In English.) If -- if -- if
 2 I can see the -- the affidavit, I can
 3 refer to it. But --
 4 (Translated.) If I could look
 5 at it, I could tell you what is accurate
 6 and what's not.
 7 MR. BEHRE: Okay. I think we're
 8 at -- why don't we take our break. It's
 9 2:00 o'clock.
 10 MR. BARET: Okay.
 11 THE INTERPRETER: Good idea.
 12 THE VIDEOGRAPHER: Going off the
 13 record at 2:00 o'clock.
 14 (Recess from 2:00 p.m. to 3:06 p.m.
 15 Israel Daylight Time.)
 16 THE VIDEOGRAPHER: Going back on
 17 record at 3:06.
 18 BY MR. BEHRE:
 19 Q. Okay. I'd like to go back to
 20 something we talked about earlier, which
 21 relates to Stuart Page's payments to Gadot.
 22 Do you know about how much Stuart
 23 Page, through his entities, paid to SDC-Gadot?
 24 A. Yes.
 25 Q. Do you know about how much?

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1 A. We have to go back to the records.
 2 But in terms of the U.S. companies, it was
 3 between two hundred, two hundred and one
 4 per month. Relating to this specific case.
 5 Because there are other cases as well.
 6 Q. Okay. Would it surprise you
 7 if, into your Gadot account at Citibank
 8 in the U.S., the total amount received
 9 from Page Group, Page Group ME, and Page
 10 Risk Management totals more than \$2.6
 11 million?
 12 A. It wouldn't surprise me. And
 13 it is not only for this specific case.
 14 Q. Okay. How did you first meet
 15 Stuart Page?
 16 A. I believe it was in 2008 or
 17 2007.
 18 Q. And how did you meet him?
 19 A. I went to London. And I was
 20 requested to do some job for him.
 21 Q. Requested by who?
 22 A. Through a mutual acquaintance
 23 for whom I was working at the time.
 24 Q. And who is that mutual
 25 acquaintance?

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1 A. How is this connected to
 2 this case?
 3 Q. It's directly related. Stuart
 4 Page paid you 2 point -- Stuart Page paid
 5 you \$2.6 million into the U.S. account.
 6 And I want to know how it is you
 7 first came in contact with Stuart Page.
 8 A. I met him through a mutual
 9 acquaintance. I believe it was Mr. Rafi
 10 Pridan.
 11 MR. BEHRE: What's the name?
 12 THE INTERPRETER: Rafi Pridan.
 13 Rafi Pridan.
 14 BY MR. BEHRE:
 15 Q. And Mr. Pridan's been convicted
 16 of hacking, hasn't he?
 17 A. I'm not familiar with this.
 18 I don't think so.
 19 Q. He's been charged with hacking,
 20 hasn't he?
 21 A. No. To the best of my knowledge,
 22 he was not accused of hacking.
 23 Q. Okay. And what you -- you said
 24 it was 2008 when you first met him?
 25 A. I think so.

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1 we would make some arrangements that would
 2 pacify the banks. But to the best of my
 3 recollection, there was no organized orderly
 4 retainer agreement with him.
 5 Q. What was the purpose for which
 6 you were hired?
 7 A. You mean on the Beech Project?
 8 Q. Yes.
 9 A. As I specified earlier, there
 10 were concerns and suspicions on the part
 11 of the boss that Khater Massaad was stealing,
 12 was causing damage to the State, including
 13 assistance given to political opponents,
 14 including felonies that would embarrass
 15 the boss very seriously vis-a-vis the
 16 United States, in terms of violations
 17 of the sanctions against Iran.
 18 Q. Did your investigation involve
 19 at all Karam Al Sadaq?
 20 A. The correct name is Karam Al --
 21 Karam --
 22 THE INTERPRETER: Karam Al --
 23 THE WITNESS: -- Al Sadeq.
 24 THE INTERPRETER: -- Sadeq.
 25 THE WITNESS: Karam. Karam.

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1 Q. When were you first hired for
 2 Project Beech?
 3 A. I believe it was March 2015.
 4 Q. So you worked with Stuart Page
 5 for approximately seven years before this
 6 project; right?
 7 A. Not consistently. But between
 8 2008 and 2015, on and off.
 9 Q. And did your work for Stuart Page,
 10 relating to Khater Massaad and the others,
 11 such as Farhad Azima, did they go by any
 12 other name than Project Beech?
 13 A. I was working only on Khater
 14 Massaad, as the subject of my investigation.
 15 And it went only under Project Beech.
 16 Q. Was there ever a time when that
 17 investigation was also called Project Oak?
 18 A. No. Project Oak is something else.
 19 Q. Okay. You testified earlier that
 20 you did not have a retainer agreement with
 21 Stuart Page; is that correct?
 22 A. To the best of my recollection,
 23 there was no retainer agreement.
 24 Occasionally, when we had problems
 25 with funds transferring with Hong Kong,

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1 THE INTERPRETER: Karam Al --
 2 Karama?
 3 THE WITNESS: Karam.
 4 THE INTERPRETER: Karam Sadeq.
 5 THE WITNESS: "Kaf," "aleph,"
 6 "mem" -- "resh," "mem."
 7 THE INTERPRETER: Karam Sadeq.
 8 THE WITNESS: Karam Al Sadeq.
 9 THE INTERPRETER: Karam Al Sadeq.
 10 THE WITNESS: I also speak Arabic.
 11 When we launched our investigation,
 12 Karam was already arrested by the authorities
 13 of RAK. And we did -- we did get feedback
 14 from -- concerning him from the investigation.
 15 He had already been investigated by RAK, among
 16 other things, concerning offshore companies
 17 that he had.
 18 BY MR. BEHRE:
 19 Q. The allegations against Al Sadeq
 20 were similar to the allegations against
 21 Massaad; right? They were related?
 22 A. Not -- not exactly.
 23 To the best of my recollection,
 24 Sadeq assisted in creating the infrastructure
 25 for Massaad's activity. But the -- the

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1 initiator was Massaad.
 2 Q. Were you present for any of the
 3 interrogations of Al Sadaq?
 4 A. No. And I've never been to Ras
 5 Al Khaimah.
 6 Q. And how long did you work on
 7 Project Beech for for which payments were
 8 received by SDC-Gadot?
 9 A. I estimate that it was from the
 10 beginning of 2018 and up to April 2020.
 11 Q. Right before we went to lunch,
 12 we talked about a meeting that you recalled
 13 in Cyprus.
 14 Do you remember that discussion?
 15 A. Yes.
 16 Q. And that was on November 21st,
 17 2018?
 18 A. (Translated.) I have to see
 19 the affidavit of Majdi Halabi in order
 20 to remember --
 21 (In English.) The exact date.
 22 (Translated.) -- the exact date.
 23 Q. Well, wouldn't your travel records
 24 show?
 25 A. Yes. But I don't have them with

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1 also.
 2 Q. And Stuart Page.
 3 What was discussed at that
 4 meeting, if you recall?
 5 A. It was a coordination meeting
 6 concerning the management of the case.
 7 One of the subjects was the fact that
 8 in the procedure -- or the proceedings --
 9 THE INTERPRETER: Sorry.
 10 THE WITNESS: -- involving
 11 Farhad Azima, Stuart was requested to
 12 tell who was it that divulged to him
 13 the existence of the leaked materials.
 14 Since the -- there was a fear
 15 on the part of the client to divulge that
 16 an Israeli firm was working for him and
 17 that it would be mis-used by his political
 18 opponents, we decided that Majdi Halabi,
 19 who was working on the case, is the one
 20 who will say that he is the one who told
 21 Stuart about the leaked information or
 22 the leaked files, leaked materials.
 23 And I'd like to clarify that,
 24 to this day, we do not know who it was
 25 who had reported to Stuart the existence

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1 me right here.
 2 Q. Well, I'm -- I'm confused.
 3 Because I thought you didn't --
 4 you thought Mr. Halabi wasn't telling the
 5 truth.
 6 But you want to read his witness
 7 statement to find out what the truth is?
 8 A. Mr. Halabi stated in -- two
 9 meetings in his affidavit. One of them
 10 was not held. If I see -- if I -- if
 11 I see his affidavit, I will see in which
 12 meeting -- to which meeting he relates
 13 where Mr. Hughes was present. And that
 14 is the meeting that did take place indeed.
 15 But I need to see the affidavit in order
 16 to -- to ascertain that.
 17 Q. Well, putting aside the precise
 18 day, was it November 2018?
 19 A. Once again, I think so.
 20 Q. Okay. And that was the meeting
 21 where Hughes was present, Gerard was
 22 present, Buchanan was present; right?
 23 A. Yes.
 24 Q. And Halabi was present?
 25 A. In part of it. And Stuart

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1 of those leaked documents.
 2 BY MR. BEHRE:
 3 Q. So when you attended that
 4 meeting in Cyprus in November 2018,
 5 you were paid by Page -- one of Page's
 6 entities to SDC-Gadot; right?
 7 A. As I said before, the payment
 8 was made for the entire activity on
 9 this case, among other things for that
 10 specific meeting.
 11 Q. And that specific meeting
 12 concerned Farhad Azima; correct?
 13 A. This was -- this related
 14 to a legal proceedings that the client
 15 had requested us to refer to, legal
 16 proceedings bearing on or touching
 17 Farhad Azima.
 18 Q. So you were paid to attend
 19 the meeting in Cyprus that concerned
 20 Farhad Azima; correct?
 21 A. Yes.
 22 Q. Who ran that meeting in Cyprus?
 23 A. I think it was Neil.
 24 Q. You ran the meeting?
 25 A. (Comment in Hebrew.)

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1 THE INTERPRETER: (Comment in
2 Hebrew.)
3 MR. BARET: He said "Neil."
4 THE INTERPRETER: (Comment in
5 Hebrew.)
6 MR. BARET: "Neil."
7 THE INTERPRETER: "Neil." "Neil."
8 MR. BEHRE: Oh. I'm sorry. I
9 thought it was "me."
10 THE INTERPRETER: Sorry. "Neil."
11 MR. BARET: No. "Neil."
12 MR. BEHRE: "Neil."
13 THE INTERPRETER: No. "Neil."
14 BY MR. BEHRE:
15 Q. Okay. So Neil Gerard ran the
16 meeting?
17 A. Apologies.
18 A. "Kin."
19 Q. And how many -- where did the
20 meeting occur?
21 A. In a conference room of this
22 type in one of the hotels there. But
23 I do not -- don't recall specifically
24 which.
25 Q. How long did the meeting last?

1 A. Yes.
2 Q. And who was responsible for
3 booking that hotel and for security
4 arrangements for all the parties to
5 get there?
6 A. Stuart had asked me to organize
7 a meeting under the seal of secrecy that
8 would be secured and secluded.
9 At first I suggested to him
10 to hold it in Israel because, in Israel,
11 it's the easiest for me to arrange the
12 security. Then he asked it to be in
13 Switzerland. So I'm the one who reserved
14 the hotel. I also booked security personnel,
15 cars, vehicles that would drive the people,
16 and all that on Stuart's request.
17 Q. And were all those expenses
18 billed through and paid from Page to
19 SDC-Gadot?
20 A. I assume so. Yes.
21 Q. How long did that meeting at
22 the Swiss hotel last?
23 A. Two or three days.
24 Q. And you rented out the entire
25 hotel for those two or three days; right?

1 A. I estimate about two hours.
2 Q. Did you stay -- did anybody
3 stay overnight?
4 A. Not that I know of.
5 Q. What did Neil Gerard say the
6 purpose of the meeting was?
7 A. The -- the purpose was the --
8 the coordination of the management of
9 this case generally. And one of the
10 specific subjects was the preparation
11 by Stuart for his testimony in the
12 trial.
13 Q. And by the "management of
14 this case generally," you're referring
15 to the lawsuit involving Farhad Azima
16 and Rakia?
17 A. One of the subjects was that.
18 Q. You also attended a meeting in
19 Switzerland; correct?
20 A. Yes.
21 Q. Do you recall when that was?
22 A. I believe it was the end of 2019.
23 Q. Was it in December 2019?
24 A. I believe so.
25 Q. Was it at the Hotel Mooseg?

1 A. It was a hotel that was not
2 active during the week. It was only
3 active on weekends. So there -- that
4 is why it was convenient to -- to book
5 it for our purpose. And it was easy
6 to -- to arrange the security arrangements.
7 Q. And during your stay there, you
8 had a private chef and a private wine cellar
9 to use; right?
10 A. I -- I believe it is a slightly
11 exaggerated or overrated description.
12 Someone was cooking for us. And
13 I personally don't consume alcohol at all,
14 whatsoever. But with the meals, there was
15 also alcohol served.
16 Q. Well, Mr. Gerard likes his wine;
17 right?
18 A. Mr. Stuart likes the honey that
19 he took from the hotel. Each one has his
20 own likings.
21 Q. What was the purpose of the
22 meeting?
23 A. As far as I'm concerned, the
24 purpose was another coordination meeting
25 in the management of this case.

1 The atmosphere in the meeting
2 was, of course, more homely [sic], more
3 pleasant. And he asked the people who
4 had submitted affidavits to do some sort
5 of rehearsal for the trial.

6 As I personally was no party
7 to this trial, in the parts that related
8 specifically to the trial, I practically
9 did not participate.

10 Q. And the rehearsal of -- the
11 rehearsal of the trial testimony concerned
12 Mr. Page and Mr. Halabi; correct?

13 A. Yes. Correct.

14 Q. And Mr. Gerard too, because
15 he was going to testify at the trial;
16 right?

17 A. I would assume so. I'm not
18 really very well-versed in, you know,
19 what was -- had to do with the running
20 of the trial. I wasn't a party to it --
21 to that case.

22 So -- but yes, I would assume
23 that Gerard also was to give testimony
24 at that trial.

25 Q. And you instructed everybody

1 personally guard people inside.

2 Q. Okay.

3 A. And -- and some of the time, I
4 actually let them go eat and I took over
5 for them.

6 Q. Were you present when Mr. Halabi
7 was rehearsing his testimony?

8 A. I don't recall. It's possible
9 for part of the time. But I -- I don't
10 recall specifically.

11 Q. You're the one that asked Halabi
12 to be involved in the case; isn't it true?

13 A. Halabi was involved in this case
14 long before 2018 or '19 or whenever it was.
15 Halabi, in fact, covered very large parts
16 of areas in the Gulf and Saudi Arabia.
17 And he was well-versed in the details of
18 the case.

19 It might have been me or perhaps
20 it was him who suggested this minor detail
21 that the leaked information was on the
22 Internet.

23 Q. And you say that's a minor detail.

24 But that was a big issue in the
25 case, wasn't it?

1 that attended the meeting to leave their
2 phone home or to turn it off when they
3 were at the location so their location
4 device on the phone would not work; right?

5 A. No. I had my phone. Majdi had
6 his phone. The -- the security team had
7 theirs. Nobody gave those instructions.

8 Q. (Not translated.) So what was
9 the purpose of the -- of a security team?

10 A. At that stage, so the -- at that
11 time, the boss was extremely concerned that
12 somebody was trying to topple him or that
13 he was going to be toppled. And he asked
14 Stuart -- because I got my instruction from
15 Stuart. He asked Stuart -- he insisted that
16 there be the most stringent security measures
17 possible taken.

18 Q. But as I understand what you're
19 saying, there were bodyguards who you hired
20 to guard the hotel.

21 Am I right?

22 A. Yes. The -- the -- the bodyguards'
23 job was to stand outside and to keep a lookout
24 to see if there were any surveillance teams
25 surveilling the hotel. They -- they didn't

1 A. I'm not a legal expert. And I
2 didn't follow all the details of the case,
3 because that's not my job. I consider it
4 a minor detail.

5 Q. Well, you're aware, aren't you,
6 that by the time that meeting was held
7 in Switzerland, Farhad Azima had already
8 sued Rakia, the boss, for hacking him in
9 the United States; right?

10 A. I don't -- I have no information
11 regarding who hacked into Farhad Azima's
12 computers. But I do know that, in wake
13 of the trial in the U.K., it was decided
14 that the boss -- he was right, that he --
15 yeah, that he was right.

16 Q. The boss was right about what?

17 A. He won the trial in England,
18 his suit against Farhad Azima.

19 Q. But you're aware now that two
20 of the witnesses who testified at the
21 trial admitted they committed perjury
22 and that the plot to commit that perjury
23 occurred at that Swiss hotel that you
24 set up?

25 Are you aware of that?

1 A. I was not part of the trial.
 2 I was asked -- I was asked to organize
 3 the meeting and be in charge of security.
 4 And I understand that there's a trial now
 5 regarding the liability of the person who
 6 did what he said he did.
 7 Q. But you're aware that two of the
 8 people that attended that meeting, under
 9 high security in Switzerland, Mr. Page and
 10 Mr. Halabi, have now confessed to committing
 11 perjury and have said they learned their
 12 perjury in Switzerland and the headmaster
 13 of that perjury school was Neil Gerard?
 14 That's what they both say; right?
 15 A. I cannot relate to the content
 16 of the conversations between Neil Gerard,
 17 Stuart Page, and Majdi Halabi, because
 18 I was not a part of those conversations.
 19 What I can say -- what I can
 20 say is that, upon reading the new affidavits
 21 from Majdi Halabi and Stuart Page, I identify
 22 certain statements that are not true.
 23 Q. And you're aware that Stuart Page
 24 specifically says he hired you to hack; right?
 25 That's what he says.

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1 THE INTERPRETER: It's -- no, you're
 2 fine.
 3 MR. BEHRE: Okay.
 4 THE INTERPRETER: You can go on as
 5 long as you like. We have it right in front
 6 of us. So --
 7 MR. BEHRE: Okay.
 8 THE INTERPRETER: -- we have the
 9 true notes, the realtime, or whatever it's
 10 called.
 11 BY MR. BEHRE:
 12 Q. (Not translated.) Are -- and --
 13 and I -- I don't know if I said the obvious.
 14 But these are SDC-Gadot LLC's
 15 bank records; correct?
 16 A. I thank you, first of all, for
 17 bringing it to me, because I didn't have
 18 it.
 19 (Pending question translated.)
 20 THE WITNESS: Yes, yes. That's
 21 correct.
 22 BY MR. BEHRE:
 23 Q. And it appears that the account
 24 was opened, from the first page that's
 25 Bates number 44, on October 30th, 2017,

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1 A. And that's one of the parts that
 2 are lies.
 3 (Exhibit 4 marked.)
 4 BY MR. BEHRE:
 5 Q. I'd like to next show you what
 6 we've marked as Exhibit No. 4. It's the
 7 Citibank bank statements --
 8 A. (Comment in Hebrew.)
 9 Q. -- the first one being an account
 10 statement for October 2017, the last statement
 11 being an account statement for June 2021.
 12 And they have a Bates number, so
 13 a number at the bottom right-hand corner,
 14 that starts with the last five digits 00044
 15 through 00147.
 16 A. Okay. (Examining.)
 17 MR. BEHRE: And apologies if my
 18 sentences are too long.
 19 THE INTERPRETER: No, it's fine.
 20 I have it --
 21 MR. BEHRE: You should --
 22 THE INTERPRETER: -- in front --
 23 MR. BEHRE: -- both feel free --
 24 THE INTERPRETER: -- of me.
 25 MR. BEHRE: -- to stop me.

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1 with a deposit of a thousand dollars;
 2 right?
 3 A. Yes. That's at the opening
 4 of the account.
 5 Q. And you testified earlier
 6 that you opened this account in person
 7 in Florida; correct?
 8 A. Yes.
 9 Q. And when you opened the account,
 10 what did you represent to Citibank the
 11 business of SDC-Gadot was?
 12 A. I do not recall.
 13 Q. Did you fill out an application
 14 form that you recall?
 15 A. I assume that I did. But I do
 16 not recall.
 17 Q. I'd like to turn your attention
 18 to page 48. And, again, the numbers are
 19 in the lower right-hand corner. It's the
 20 bank statement for the period of December
 21 1st through December 31st, 2017.
 22 It should be five pages in.
 23 A. (Comment in Hebrew.)
 24 (In English.) Yes.
 25 (Translated.) Okay. Yes.

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1 Q. And you see on December 20th,
 2 2017, a credit for \$5,000, which was a
 3 wire from Insight Analysis and Research;
 4 right?
 5 A. Yes.
 6 Q. And then two pages later, on
 7 page 50, there's \$45,000 wired again by
 8 Insight Analysis.
 9 Do you see that?
 10 A. (In English.) Yes.
 11 (Translated.) Yes.
 12 Q. And Insight Analysis is your
 13 other Florida-based LLC; correct?
 14 A. Yes.
 15 Q. (Not translated.) And now going
 16 to page 52, which is the statement for
 17 February 2018, you'll see another deposit,
 18 this time for \$111,950. And it's a wire
 19 from Page Group ME.
 20 Do you see that?
 21 A. "Kin."
 22 (In English.) Yes.
 23 Q. And that's a payment from Mr. Page,
 24 who hired you for Project Beech; correct?
 25 A. (Translated.) Yes.

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1 Do you see that?
 2 A. "Kin."
 3 (In English.) Yes.
 4 (Last question partially
 5 translated.)
 6 THE INTERPRETER: "Yes."
 7 BY MR. BEHRE:
 8 Q. And Fusion GPS is an
 9 investigative firm; is that correct?
 10 A. Yes. But there's no connection
 11 whatsoever to Stuart Page or Project Beech.
 12 Q. And Fusion GPS was a subcontractor
 13 to SDC-Gadot; correct?
 14 A. No. They did not do any work for
 15 SDC-Gadot. But they -- they received payment
 16 for something else.
 17 Q. (Partially translated.) Well, SD --
 18 let me -- let me rephrase it.
 19 SDC-Gadot paid Fusion GPS \$99,000
 20 in February of 2018; right?
 21 THE INTERPRETER: 2018? 2018.
 22 MR. BEHRE: Yes.
 23 (Remainder of pending question
 24 translated.)
 25 THE WITNESS: Yes.

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1 (In English.) I suppose so.
 2 (Translated.) I suppose so. But
 3 I'm not -- I'm not sure. Because there were
 4 other projects. Mr. Page paid me for other
 5 projects other than Beech. So I'd have to
 6 check to make sure.
 7 Q. And your invoices would indicate
 8 if it was Project Beech; correct?
 9 A. (In English.) Yes.
 10 (Translated.) Yes.
 11 Q. And you indicated you reviewed
 12 some invoices to prepare for your testimony
 13 today.
 14 Did those invoices say "Project
 15 Beech" on them?
 16 A. Yes. But I don't have them here.
 17 I can bring them tomorrow.
 18 Q. (Translated.) Okay. Would you
 19 do that, please?
 20 (Not translated.) And if you
 21 look on the same page, that's page 52,
 22 on February 6 and February 13, just about
 23 a week apart, there were two transfers,
 24 one for 49,000 and one for 50,000, to
 25 Fusion GPS.

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1 BY MR. BEHRE:
 2 Q. And what were they paid for?
 3 A. I don't recall what the payment
 4 was for. But I can say that Fusion GPS
 5 had no connection to Stuart Page or
 6 Project Beech.
 7 Q. But if you can't recall what
 8 it was for, how could you be sure?
 9 A. Because I know that Fusion had
 10 nothing to do with this case.
 11 Q. If you turn the page, on page 53,
 12 you'll see that Fusion gets another 50,000
 13 on February 15, another 50,000 on February
 14 20, and another 50,000 on February 27.
 15 Do you see that?
 16 A. Yes.
 17 Q. And so --
 18 A. Same answer.
 19 Q. So for the month of February,
 20 Fusion GPS was paid 250 --
 21 (Brief telephone interruption.)
 22 BY MR. BEHRE:
 23 Q. -- \$250,000 by SDC-Gadot; right?
 24 A. That's correct.
 25 Q. And did the payments to Fusion

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1 GPS relate to anything you were doing
 2 for Stuart Page?
 3 A. Under no circumstances. Not
 4 at all.
 5 Q. Well, earlier today you said
 6 this account was opened simply because
 7 Stuart Page had trouble transmitting
 8 funds to you; right?
 9 A. That's correct.
 10 Q. (Partially translated.) And
 11 the other entry on page 53 is a \$275,000
 12 credit, a wire from Insight, your other
 13 Florida entity, to this Gadot account;
 14 right?
 15 THE INTERPRETER: Two hundred
 16 and seventy-five, you said; right?
 17 MR. BEHRE: Yes.
 18 (Remainder of pending question
 19 translated.)
 20 THE WITNESS: Yes. That's
 21 correct.
 22 BY MR. BEHRE:
 23 Q. (Partially translated.) There's
 24 a \$47,000 payment on February 22nd, a wire
 25 to an Olam Hamachshevim.

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1 right?
 2 THE INTERPRETER: What was his name
 3 again?
 4 THE COURT REPORTER: Glenn. Glenn.
 5 THE WITNESS: Glenn.
 6 MR. BEHRE: Glenn Simpson.
 7 (Remainder of pending question
 8 translated.)
 9 THE WITNESS: Not only. But yes,
 10 him too.
 11 BY MR. BEHRE:
 12 Q. And the other one was Peter French;
 13 right?
 14 A. Yes. Peter French too.
 15 Q. (Not translated.) Directing
 16 your attention to 54. That's the SDC-Gadot
 17 statement for March 2018.
 18 There is a -- there's a wire on
 19 March 1st for \$30,000 to Aviram Hawk, which
 20 is Aviram Azari's company; correct?
 21 THE INTERPRETER: Whose company?
 22 THE COURT REPORTER: Aviram's.
 23 MR. BEHRE: Aviram Azari.
 24 THE INTERPRETER: Azari.
 25 (Pending question translated.)

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1 Who is that?
 2 THE INTERPRETER: Did I get that
 3 right, Olam Hamachshevim?
 4 THE WITNESS: "Kin." Olam
 5 Hamachshevim.
 6 (Remainder of pending question
 7 translated.)
 8 THE WITNESS: (Translated.) It's
 9 a vendor who supplied me with equipment.
 10 Again, it has nothing to do with --
 11 (In English.) Stuart Page.
 12 (Translated.) -- Stuart Page.
 13 BY MR. BEHRE:
 14 Q. So it's your testimony that Olam
 15 [sic] sold you equipment?
 16 A. Yeah. It's a computer store, Olam
 17 Hamachshevim.
 18 THE INTERPRETER: That -- interpreter's
 19 note. That means "computer world" in -- in
 20 Hebrew.
 21 "So yeah, I -- I guess it must
 22 have been for equipment."
 23 BY MR. BEHRE:
 24 Q. (Partially translated.) And your
 25 contact point at Fusion GPS was Glenn Simpson;

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1 THE WITNESS: Yes. That's
 2 correct.
 3 BY MR. BEHRE:
 4 Q. And Mr. Azari recently pled
 5 guilty in Federal Court in New York to
 6 hacking, didn't he?
 7 A. Yes. He confessed to seven
 8 separate incidents of computer hacking
 9 in New York.
 10 Q. And the document in which he
 11 pled guilty references an Israeli company.
 12 But they don't name that company.
 13 Was that company yours?
 14 A. No.
 15 Q. How do you know that?
 16 A. Because I've never commissioned
 17 hacking and have never paid for hacking.
 18 Q. You're aware that Mr. Azari is
 19 cooperating with Federal law enforcement
 20 officials in the U.S.; correct?
 21 A. I wish him all the best.
 22 Q. Have you been contacted by those
 23 prosecutors about this case?
 24 MR. BARET: It's not related to
 25 SDC-Gadot. You don't have to answer that.

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1 THE WITNESS: This has nothing
 2 to do with this case or with Stuart.
 3 BY MR. BEHRE:
 4 Q. Well, I beg to differ.
 5 The SDC-Gadot bank statement,
 6 which is directly related to this case,
 7 has a wire out to a man who's confessed
 8 to and now convicted of hacking. This
 9 case is all about hacking. And I'm asking
 10 the witness about his relationship with
 11 the hacker.
 12 MR. BARET: You can ask about
 13 the transaction, why it was paid. And he
 14 can confess to a -- confess to a murder.
 15 I mean, it doesn't mean that it's got
 16 anything to do with SDC-Gadot.
 17 MR. BEHRE: I am entitled to
 18 explore it. If you want to instruct him
 19 not to answer, then we'll have to just
 20 raise this issue too. It's up to you.
 21 MR. BARET: I mean --
 22 THE WITNESS: I -- I have answered
 23 that this has nothing to do with this case.
 24 And Aviram Azari did other jobs, other than
 25 hacking, that he was paid for.

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1 And I asked him that any investigations he
 2 did to me -- for me be done in accordance
 3 with the law.
 4 Q. Why did you find it necessary to
 5 tell him to act lawfully?
 6 A. I say that to every one of my
 7 subcontractors.
 8 Q. If you look on the same page,
 9 that's page 54, there are two entries on
 10 March 15th, 2018, where you received wires.
 11 And one of them -- the first one is from
 12 Florida AP [sic] Telecom, Inc.
 13 Do you see that?
 14 It's \$100,000 that came in from
 15 a Florida entity; correct?
 16 A. This is -- this is a -- a different
 17 customer. It has nothing to do with Page
 18 or any of this case.
 19 And I can add that the investigation,
 20 in this particular instance, was in South
 21 America and has nothing to do with what's
 22 going on.
 23 Q. In your affidavit that you
 24 submitted in this case in Florida, you
 25 indicated that you didn't transact business

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1 "Rega."
 2 THE INTERPRETER: No.
 3 THE WITNESS: The prosecutors,
 4 in the case of Aviram Azari, have never
 5 contacted me or asked me for any information.
 6 BY MR. BEHRE:
 7 Q. What work did Azari do for you,
 8 if it wasn't hacking?
 9 A. For me he never did any work.
 10 Q. Yet he was paid \$55,000 on March
 11 1st and March 12, 2018.
 12 A. He did work for Gadot. And
 13 that work included economic investigations
 14 or financial investigations.
 15 Q. And by --
 16 THE INTERPRETER: "Financial
 17 investigations" or "economic."
 18 BY MR. BEHRE:
 19 Q. And by "financial investigations,"
 20 does that mean obtaining confidential
 21 banking and financial records about
 22 individuals who were being investigated?
 23 A. The investigations that Azari
 24 did for me had nothing to do with Project
 25 Beech or anything to do with Stuart at all.

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1 in Florida. And yet we have a transaction
 2 where you received \$100,000 from a Florida
 3 company.
 4 What business did you transact
 5 with this Florida company?
 6 A. I did not transact any business
 7 in Florida, as I said earlier. And this
 8 payment is for work that was done in South
 9 America.
 10 Q. With a Florida company; right?
 11 A. The payment, as I see here,
 12 came from Florida. But again -- once
 13 again, this has nothing whatsoever to
 14 do with Stuart Page or Project Beech.
 15 Q. And if you go to the next page,
 16 page 55, here's another wire from Florida
 17 IP Telecom on March 16th for \$200,000.
 18 Do you see that?
 19 A. Yes.
 20 Q. (Partially translated.) And
 21 Florida IP Telecom is owned by Fernando
 22 Alonzo Paredes; right?
 23 THE INTERPRETER: Could you
 24 repeat the name? Fernando?
 25 MR. BEHRE: Fernando Alonzo

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1 Paredes, P-a-r-e-d-e-s.
2 (Remainder of pending question
3 translated.)

4 THE WITNESS: That may be
5 correct.

6 BY MR. BEHRE:

7 Q. (Partially translated.) And
8 he also owns a company called Overseas
9 Consulting Limited, LLP, another Florida
10 company; correct?

11 THE INTERPRETER: Could you
12 repeat the name of the company?

13 MR. BEHRE: Overseas Consulting
14 Limited, LLP.

15 (Remainder of pending question
16 translated.)

17 THE WITNESS: I have no idea.
18 I don't know the person. I have no way
19 of confirming or denying that.

20 BY MR. BEHRE:

21 Q. Well, if you look on March 23rd,
22 on page 55, you received \$350,000 from
23 Overseas Consulting Limited, LLP; correct?

24 A. There's no connection whatsoever
25 between these wires and Stuart Page. And

1 2021, in this bank account alone, you
2 transferred from the Citibank account
3 for Gadot SDC more than 2.5 million to
4 Gadot Information Services here in Israel?

5 A. I didn't add it up. But that
6 sounds about right.

7 Q. And would it surprise you if
8 I said that the payments to Fusion GPS,
9 between just February 2018 and July 2018,
10 total more than \$1.2 million?

11 A. I do not understand the connection
12 between Page, the Beech Project, Azima,
13 and Fusion.

14 Q. (Not translated.) I'm just
15 asking you: Does it surprise you that,
16 from February 2018 through July 2018,
17 there were payments from the SDC-Gadot
18 Citibank account with a Miami, Florida
19 address to Fusion, exceeding \$1.2 million?

20 A. My answer is that I'm not surprised.

21 Q. Okay. What is BM -- BMI Analysis
22 Limited?

23 A. I don't remember. It could be
24 one of the vendors or one of the customers.

25 Is it someone on the receiving

1 I -- I can't answer beyond saying that
2 this has nothing to do with Project Beech,
3 Farhad Azima, or Stuart Page.

4 Q. So in the month of March 2018,
5 you received \$650,000 from Florida
6 companies; correct?

7 A. This work was not executed
8 in Florida. The customer is not a U.S.
9 citizen. And apparently part of the
10 payment for this work was transferred
11 through an American -- through American
12 companies.

13 Q. But are you aware that Overseas
14 Consulting Limited, LLP, is a Florida
15 corporation?

16 A. It's not something I checked
17 then. I believe you.

18 Q. And then on that same page,
19 page 55, on March 19th and March 20th,
20 there are wires out to Gadot Information
21 Services, which, as I understand it, is
22 the Gadot entity here in Israel; correct?

23 A. Correct.

24 Q. And does it sound about right
25 that, between March 2018 and February 20 --

1 end? On the paying end?

2 (Comment in Hebrew.)

3 Q. If you look at March 30th.

4 A. I'm looking for it.

5 Q. March 30th.

6 A. (In English.) CBOL to BMI. Aah.
7 (Translated.) I paid. So I guess
8 it's one of our vendors.

9 Q. And it's true, isn't it, that BMI
10 Analysis Limited was also working on Project
11 Beech?

12 A. I do not recall.

13 Q. Okay. Now let's go to April
14 2018, page number 56.

15 A. Going backwards?

16 Q. And you'll see that there are
17 five payments for \$50,000 each to Fusion.
18 And there are several wires out to Gadot
19 Information Services for \$50,000.

20 Why --

21 A. Citibank restricted the amounts
22 of the transfers I could make to \$50,000
23 each. And that is why we divided payments
24 into several \$50,000 payments.

25 Q. And why did Citibank impose that

1 restriction?
 2 A. You have to ask them.
 3 Q. Did it -- was it always that way?
 4 Or did they restrict you after you opened
 5 the account?
 6 A. No. It was from the start.
 7 Q. And in April of 2018, there were
 8 several more wires out from SDC-Gadot to
 9 Gadot Information Services here in Israel;
 10 right?
 11 A. Correct.
 12 Q. (Partially translated.) Throughout
 13 these bank records, there are debit card
 14 purchases for iPostall.
 15 What are those?
 16 THE INTERPRETER: What's the name
 17 again?
 18 MR. BEHRE: IPostall.
 19 (Remainder of pending question
 20 translated.)
 21 THE WITNESS: (Comment in Hebrew.)
 22 (In English.) Which date?
 23 (Translated.) Which -- which line?
 24 Which date?
 25 //

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1 62. That's for May 2018.
 2 A. Yes.
 3 Q. And you'll see more wires to BMI
 4 Analysis Limited.
 5 Do you see that on May 1?
 6 A. (In English.) Okay.
 7 (Translated.) Okay.
 8 Q. And there are numerous wires
 9 out to your Gadot entity here in Israel,
 10 starting on May the 2nd.
 11 Do you see that?
 12 A. Yes.
 13 Q. (Partially translated.) And
 14 you'll see, on May 21st, Page Group ME
 15 sends you \$187,000 -- 187,450?
 16 THE INTERPRETER: 180,000?
 17 THE WITNESS: Yes. But I do
 18 not know if this is on account of the
 19 Beech Project or other projects.
 20 BY MR. BEHRE:
 21 Q. And would the invoices tell
 22 you whether it's Project Beech?
 23 A. I assume so. Yes.
 24 Q. And do you have that invoice?
 25 A. As I said before, I will bring

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1 BY MR. BEHRE:
 2 Q. It is March 17th -- April. I'm
 3 sorry.
 4 A. (Comment in Hebrew.)
 5 THE INTERPRETER: "Kin."
 6 MR. BARET: April 20th.
 7 BY MR. BEHRE:
 8 Q. And April 20th too. And April
 9 24th too.
 10 MR. BARET: It's like \$10. 9.99.
 11 You see it?
 12 THE WITNESS: (In English.) It
 13 might be Apple Music or whatever, I think.
 14 (Comment in Hebrew.)
 15 BY MR. BEHRE:
 16 Q. Well, could it be --
 17 THE INTERPRETER: "I don't remember."
 18 BY MR. BEHRE:
 19 Q. (Not translated.) Could it be an
 20 electronic mailbox where you kept messages?
 21 A. (In English.) No.
 22 (Translated.) First of all, you
 23 don't pay for electronic mail. But I don't
 24 remember.
 25 Q. Okay. Let's go to pages 60, 61,

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1 them tomorrow.
 2 Q. Because you would need to retain
 3 those invoices for your tax purposes; right?
 4 A. The invoices in Israel, I do
 5 have to preserve them. The invoices for
 6 the United States, I have to preserve them
 7 only for two years.
 8 Q. And, finally, on page 62, you'll
 9 see there are three more wires to Fusion
 10 GPS, 50,000 each time, three.
 11 So \$150,000 between May 29th
 12 and May 31st; right?
 13 A. Yes. Correct.
 14 Q. Moving to June 2018, pages 64
 15 and 65, two large wires coming in from
 16 Florida companies, one on June 14th
 17 for \$100,000 and one on June 15th for
 18 \$350,000.
 19 Do you see those entries?
 20 A. Yes, I see.
 21 Q. And then, on the next page,
 22 page 65, four more payments to Fusion
 23 GPS, 50,000 each, plus the one on the
 24 prior page on June the 5th, totaling
 25 \$250,000 wired to Fusion GPS in June

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1 of 2018; correct?
2 A. Yes.
3 Q. Going to July 2018, pages 66,
4 67, 68, you'll see numerous wires out
5 to Gadot Information Services. I haven't
6 totaled them all up. But it looks to be
7 five, six, or seven of those.

8 Do you see those, starting on
9 May -- on July 9? I'm sorry. Starting
10 on July 2nd?

11 A. Yes, I see.

12 Q. And so that's in July 2018 alone,
13 almost a half a million dollars wired out
14 of the SDC -- SDC-Gadot account to --

15 THE INTERPRETER: Sorry.
16 BY MR. BEHRE:

17 Q. So my question is: You went
18 through all this trouble to open the
19 SDC-Gadot LLC account with Citibank.
20 And yet you appear to be moving money
21 just about as fast as you get it out
22 to the Israeli entity.

23 Why?

24 A. Most of the work was carried
25 out by Gadot Israel. And as I explained

1 A. As I've explained before, we had
2 tried to open an account in Chase Manhattan.
3 We opened actually. We didn't try. We
4 opened. And I'm guessing that this transfer
5 was in that direction. But -- and I don't
6 even recall why we hardly used that account
7 at all.

8 Q. And if you look at the wires on
9 August 2nd, August 8, August 9, August 13,
10 again on August 13, August 20, August 21,
11 August 22, they all go to SDC-Gadot.

12 A. I can only say, again, ask for
13 a subpoena to Chase Manhattan. And we'll
14 be able to see what happened there.

15 Q. Is the Chase Manhattan account
16 still open?

17 A. No.

18 And I do not have the capacity
19 to see things myself because it is no
20 longer open.

21 Q. When was that account closed?

22 A. Quite quickly -- quite quickly,
23 I believe. I do not recall exactly. But
24 I'm going to consult, of course, with --
25 with my attorney. But I believe I can

1 before, these accounts in the United
2 States were opened merely for convenience's
3 sake, which proved itself over time.

4 As I can see now, in July, there's
5 a lot of activity that is not connected to
6 Page at all, to Stuart Page.

7 Q. Let's look at August, then.

8 Let's go to page 70 and 71.

9 On August 8, Stuart Page wires
10 you \$276,950; right?

11 A. Yes. I do see it.

12 Q. And that month, there were nine
13 wires out to Gadot.

14 A. As I explained before, the bank
15 restricted us to \$50,000 transfers. That
16 accounts for the numerous transfers. If
17 we could make a bigger transfer, we would
18 have been -- we would have made it a larger
19 transfer.

20 Q. So looking at the second entry,
21 on August 1st, 2018, it says:

22 "Wire to SDC-Gadot."

23 "\$50,000."

24 Did SDC-Gadot LLC have another
25 account besides Citibank?

1 give you permission to go into there and
2 check the account.

3 Q. And is the reason why, in this
4 particular month, you attempted to move --
5 make nine wires to the Chase Manhattan
6 account, is the reason because Citibank
7 had been starting to give you difficulties
8 regarding your account there with Citibank?

9 A. Citibank had never caused any
10 difficulty to me in my account, with the
11 exception of that restriction to transfers
12 of \$50,000. And that is why I, in fact,
13 opened the account in Chase Manhattan,
14 because this was a way of trying to
15 circumvent that restriction of \$50,000
16 that -- whose result was that we had
17 to make many transfers.

18 Q. Isn't it true that Citibank
19 expressed money-laundering concerns to
20 you about this account?

21 A. No. Not in my ears.

22 THE COURT REPORTER: "Years"
23 or "ears"?

24 THE INTERPRETER: "Ears."

25 "Ears." "In my ears." "Not in my ears."

1 BY MR. BEHRE:
 2 Q. Moving to November 2018, that's
 3 pages 76 and 77, I direct your attention
 4 to the wire on November 20th from Page
 5 Group ME.
 6 THE COURT REPORTER: From who?
 7 From who?
 8 MR. BEHRE: Page Group ME.
 9 THE WITNESS: Yes. But I still
 10 do not know if that transfer was connected
 11 to Project Beech or to other projects.
 12 BY MR. BEHRE:
 13 Q. But the invoice would indicate
 14 whether it was Project Beech; correct?
 15 A. Yes. And I will bring them
 16 tomorrow.
 17 Q. And since this payment in
 18 November was presumably for an invoice
 19 in October and because, in October, you
 20 attended a Cyprus meeting, some of those
 21 monies at least must have been related
 22 to Project Beech; right?
 23 A. For the Beech product -- Project,
 24 we had a monthly retainer. So each month
 25 we received a payment. And I cannot say

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1 A. Correct.
 2 Q. And Stuart Page has done
 3 business with Dinka previously; correct?
 4 A. Stuart Page had done business
 5 with Rafi Pridan previously. But I do
 6 not know which entity of Rafi Pridan
 7 was used.
 8 Q. And Dinka was doing work for
 9 Project Beech; correct?
 10 A. I do not remember. Could be
 11 yes. Could be no.
 12 Q. (Not translated.) Okay. And
 13 what about Ezekiel Golan Intellectual Pro,
 14 there are several wires to that entity on
 15 December 12th and 13th totaling \$65,000.
 16 THE COURT REPORTER: She's going
 17 to need the name again.
 18 THE WITNESS: (In English.) Ezekiel
 19 Golan.
 20 MR. BEHRE: Ezekiel Golan Intellectual
 21 Pro.
 22 (Pending question translated.)
 23 THE WITNESS: (Translated.) Heskell
 24 [sic] Golan is not connected in --
 25 (In English.) "Ezekiel."

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1 if this payment was specifically for the
 2 meeting in Cyprus or not.
 3 Q. But you didn't -- you didn't
 4 go to Cyprus for free; right?
 5 A. No.
 6 Q. Somebody paid for it; right?
 7 A. You are not here for free either.
 8 Q. No.
 9 A. (Comment in Hebrew.)
 10 MR. BARET: It's not pro bono?
 11 THE INTERPRETER: "Me neither."
 12 THE COURT REPORTER: Pardon?
 13 MR. BARET: No? I was shocked.
 14 I'm the only one who's not getting paid
 15 here?
 16 THE WITNESS: (Comment in
 17 Hebrew.)
 18 THE INTERPRETER: I hope so.
 19 BY MR. BEHRE:
 20 Q. All right. Directing your
 21 attention to December 2018, page 79,
 22 on December 10th, you wired \$25,000
 23 to Dinka Analysis Services.
 24 And Dinka is owned by Raphael
 25 Pridan; correct?

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1 (Translated.) Ezekiel Golan
 2 is not connected in any way whatsoever
 3 to Stuart Page or to the Beech Project.
 4 BY MR. BEHRE:
 5 Q. What services did Ezekiel Golan
 6 Intellectual provide?
 7 A. I am prevented from answering
 8 that. This is not connected. And it is
 9 under privilege.
 10 Q. (Not translated.) Under privilege
 11 because you were acting under the -- at
 12 the direction of a lawyer?
 13 A. No. Because of my agreement
 14 with Ezekiel Golan that commands a privilege.
 15 Q. Well, I don't think that's a valid
 16 basis not to answer.
 17 A. I can -- I can tell you that it's
 18 connected to some medical development, not
 19 connected at all to these issues.
 20 Q. And directing your attention to
 21 February 2019, page 83, there's a wire on
 22 February 19th from Page Group ME.
 23 Do you see that, for \$82,455?
 24 A. Yes. I do see.
 25 Q. Okay. And that was for Project

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1 Beech?
 2 A. I cannot know now. I will know
 3 tomorrow.
 4 Q. Okay. Same question. On March
 5 20th, 2019, on page 84, you received a
 6 wire from Page Group ME for \$99,950.
 7 Do you see that?
 8 A. Yes. The same answer.
 9 Q. And then on April 10th, as
 10 reflected on page 86, another wire in
 11 from Page Group ME for \$99,950.
 12 Do you see that?
 13 A. Yes, I see.
 14 Q. And then just eight days later,
 15 Page Group ME sends you another hundred --
 16 \$131,950 on April 18th.
 17 Do you see that?
 18 A. Yes.
 19 Q. And then in May 2019, going to
 20 May the 16th and May 31st, all found on
 21 page 89, you receive two wires again from
 22 Page Group ME, one for \$99,950 and the
 23 other one for \$249,950.
 24 Do you see that?
 25 A. Yes.

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1 round amounts. But Stuart being somewhat
 2 stingy, he always take the -- round down --
 3 commissions from me.
 4 MR. BARET: The wire fee.
 5 THE INTERPRETER: The wire transfer
 6 commission.
 7 THE WITNESS: (In English.) You
 8 ask.
 9 BY MR. BEHRE:
 10 Q. And then, in July 2019, there's
 11 a trip to Vegas. You stayed at the --
 12 A. (In English.) July?
 13 Q. (Translated.) July 2019 you
 14 went to the Prada store and spent \$535.
 15 (Not translated.) You -- the
 16 Montcler store --
 17 A. (In English.) I bought a belt.
 18 Q. (Not translated.) -- and spent
 19 2,175.
 20 You won a bet?
 21 A. (In English.) I -- I bought
 22 a belt --
 23 Q. (Not translated.) Oh. "Belt."
 24 A. (In English.) -- in Prada.
 25 I can bring it tomorrow.

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1 Q. And why all of a sudden are you
 2 going to being paid once a month by Page
 3 to being paid twice a month?
 4 A. It could be for several projects.
 5 And it could be also reflecting the fact
 6 that he's paying me when he's being paid.
 7 Q. And that date would line up to
 8 a meeting you had in London about Mr. Halabi's
 9 witness statement for use in the U.K. hacking
 10 case; right?
 11 MR. BARET: What -- what's the date?
 12 What's the date?
 13 THE WITNESS: I don't recall meeting
 14 Majdi Halabi in London.
 15 BY MR. BEHRE:
 16 Q. (Not translated.) Okay. And then
 17 in June 2019, on page 90, you receive from
 18 Page \$200,000 minus a five -- \$50 wire fee;
 19 right?
 20 THE INTERPRETER: 200,000, you
 21 said?
 22 MR. BEHRE: Yes.
 23 THE INTERPRETER: Okay.
 24 (Pending question translated.)
 25 THE WITNESS: All the amounts are

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1 Q. (Not translated.) Okay. I'll
 2 try it on.
 3 A. (In English.) Yeah. No. You
 4 are much thinner.
 5 Q. And you saw the Beetles on Broadway.
 6 And you ate at Joel Robuchon.
 7 Right?
 8 A. "Kin."
 9 Q. And then Mr. Page sends you again,
 10 in September 2019, \$196,000 minus a \$50 wire
 11 fee on September 6th; correct?
 12 A. Yes.
 13 Q. (Not translated.) What's Pandaface?
 14 THE INTERPRETER: What's?
 15 BY MR. BEHRE:
 16 Q. What is Pandaface?
 17 A. Where is it?
 18 Q. It's on page 107.
 19 On December 26, you sent Pandaface
 20 \$15,000.
 21 THE COURT REPORTER: How much?
 22 THE WITNESS: (Comment in Hebrew.)
 23 THE INTERPRETER: Fifteen.
 24 MR. BEHRE: 15,000. Sorry.
 25 THE WITNESS: (In English.) "Wire

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1 to Pandaface."
 2 (Translated.) I don't recall.
 3 BY MR. BEHRE:
 4 Q. (Partially translated.) And then
 5 in January, January 16th, on page 108, you
 6 send Pandaface another \$7,500.
 7 Do you see that?
 8 THE INTERPRETER: 175,000?
 9 MR. BARET: 7,500.
 10 MR. BEHRE: 7,500.
 11 (Remainder of pending question
 12 translated.)
 13 THE WITNESS: I -- I don't know.
 14 I think maybe -- maybe I sent someone, a
 15 woman, some financial assistance.
 16 BY MR. BEHRE:
 17 Q. (Partially translated.) Okay.
 18 And then, on January 27th, on page 108,
 19 Page is sending you wires from a new
 20 entity. It's called Page Risk Management
 21 DMCC.
 22 Do you see that entry on January
 23 27th?
 24 A. Yes.
 25 Q. Do you -- do you know why he

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1 A. No.
 2 MR. BEHRE: Okay. Why don't we
 3 take a break.
 4 THE VIDEOGRAPHER: Going off the
 5 record at 4:43.
 6 (Recess from 4:43 p.m. to 5:02 p.m.
 7 Israel Daylight Time.)
 8 THE VIDEOGRAPHER: Back on the record
 9 at 5:02.
 10 BY MR. BEHRE:
 11 Q. Mr. Forlit, we just looked at some
 12 of your Citibank bank records for SDC-Gadot.
 13 And I want to ask you just a big picture.
 14 You received between \$200,000
 15 and \$300,000 a month almost every month
 16 for almost five years.
 17 What did you do for that money?
 18 A. In my earlier answers, I more
 19 or less broke down the details of the
 20 investigation, which covered a lot of
 21 jurisdictions.
 22 This whole line of questioning,
 23 there's something unclear to me.
 24 If this whole trial is about
 25 hacking done by -- in 2015 by Azima and

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1 started using a different entity to wire
 2 you those funds that he says were for
 3 hacking?
 4 A. No. No idea.
 5 Q. And that's the same entity that
 6 sent you \$222,435 on March 23rd on page
 7 112.
 8 Do you see that?
 9 A. Yes. I see that the commissions
 10 are getting larger.
 11 Q. And --
 12 A. Now it's \$65 instead of \$50.
 13 Q. Now, a payment in March of 2020
 14 would be for work you did in February.
 15 And February is when Mr. Azima's
 16 trial occurred in the U.K.; correct?
 17 A. I didn't do anything regarding
 18 the trial in England. And this -- the
 19 money, the payment is for Project Beech,
 20 which continued.
 21 Q. Were you in London in late February
 22 and early March?
 23 A. I'd have to check. I don't recall.
 24 Q. Have you ever been to the Royal
 25 Automotive Club?

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1 Stuart, the liar, is saying that I've
 2 been hacking from 2017 until 2020, how --
 3 how does that have anything to do with
 4 hacking that happened in 2015?
 5 (Comment in Hebrew.)
 6 THE INTERPRETER: (Comment in
 7 Hebrew.)
 8 BY MR. BEHRE:
 9 Q. (Partially translated.) My --
 10 my question was: What did you do to earn
 11 two hundred to \$300,000 a month for five
 12 years?
 13 A. (Comment in Hebrew.)
 14 MR. BARET: Just for the record,
 15 three years. The -- the company opened in
 16 2017 and to -- to 2020; right?
 17 THE WITNESS: So we carried out
 18 investigations. And in the three years
 19 of the company's activities, we investigated
 20 a large number of violations of the sanctions
 21 on Iran, a lot of money-laundering done
 22 through Lebanon --
 23 (Comment in Hebrew.)
 24 THE INTERPRETER: You -- you
 25 mean embezzling? Or money disappearing?

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1 Misappropriation of funds?
 2 THE WITNESS: And monies that
 3 disappeared from the company in -- in
 4 Saudi Arabia.
 5 We managed to locate Khater
 6 Massaad in Saudi Arabia and the authorities --
 7 and get the authorities to arrest him. We
 8 had a regular source that visited him once
 9 a month in Saudi Arabia.
 10 We investigated financial offenses
 11 in Sri Lanka and in Switzerland.
 12 We investigated transactions in
 13 Georgia.
 14 THE INTERPRETER: Georgia, not
 15 the U.S., the country.
 16 THE WITNESS: And that's just
 17 what I can recall off the top of my head.
 18 BY MR. BEHRE:
 19 Q. And when you say you investigated
 20 transactions, are you referring to transactions
 21 in bank records?
 22 A. We got a lot of information that
 23 had its source in the customer's servers,
 24 computer servers. And a lot of the
 25 information Stuart Page brought from his

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1 Q. And do you recall ever attaching
 2 copies of confidential e-mails, for example,
 3 between Mr. Azima and his lawyers to your
 4 reports?
 5 A. I don't recall.
 6 Q. And do you recall ever excerpting
 7 and embedding into your reports confidential
 8 e-mails belonging to others?
 9 A. I don't recall. And everything
 10 that appears in the reports were materials
 11 that were presented legally.
 12 Q. And what types of materials did
 13 Mr. Page provide to you, as you indicated
 14 a few moments ago?
 15 MR. BARET: I'm -- I'm sorry.
 16 Just for the -- when -- when
 17 counsel's referring to "you," who are you
 18 referring to? Amit Forlit individually?
 19 MR. BEHRE: Yes. As paid by --
 20 for services by SDC-Gadot.
 21 MR. BARET: Right. But --
 22 THE WITNESS: Amit Forlit did
 23 not receive money from SDC-Gadot. Gadot
 24 Israel received money from SDC. And I
 25 was a representative of SDC-Gadot.

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1 own sources. We interviewed a lot of people.
 2 And that wasn't even one of the company's
 3 larger cases.
 4 Q. When you say the customer's
 5 computer servers, are you talking about
 6 Rakia's computer servers?
 7 A. Sometimes yes. There was a lot
 8 of data that we got from servers in the
 9 free zone of RAK. And a lot of materials --
 10 yes, the customer gave us a lot of materials.
 11 Q. And some of those materials
 12 included bank records that were confidential;
 13 correct?
 14 A. I don't recall.
 15 Q. To the best of your recollection,
 16 did you ever have access to bank records
 17 for any of the people that were being
 18 investigated or any of the entities
 19 that were being investigated?
 20 A. I don't recall precisely.
 21 It's possible.
 22 Q. Do you recall ever attaching
 23 confidential bank records to any of the
 24 reports that you prepared?
 25 A. I don't recall.

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1 And Page provided materials.
 2 He had his sources. Maybe some of his
 3 clients and other sources. I don't know.
 4 BY MR. BEHRE:
 5 Q. What types of materials did
 6 Mr. Page provide?
 7 A. A list of companies, a list
 8 of contacts of people who were involved,
 9 legal -- legal cases that he -- that were
 10 taken from various places.
 11 Q. Did he ever provide you with
 12 confidential e-mails or financial data
 13 belonging to others to which he wasn't
 14 entitled to have?
 15 A. I don't think so.
 16 Q. Now, regarding Mr. Halabi's
 17 testimony, as rehearsed in Switzerland,
 18 why was it decided that Halabi would
 19 claim to have found the data on the
 20 Internet?
 21 A. I don't remember who or why it
 22 was decided that Halabi would be the one
 23 to tell this or to -- to relate this.
 24 And to this day, we -- I don't
 25 know who in Halabi's firm found these links.

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1 (Comment in Hebrew.)
 2 THE INTERPRETER: Oh. "Office."
 3 THE WITNESS: Halabi was -- not
 4 his firm. He was part of the office.
 5 And everybody in the office learned
 6 about the leak quite quickly, because --
 7 because, you know, when there are people
 8 involved in the investigation, you can
 9 just put in a -- a Google alert. And you
 10 don't have to actually look for it. It
 11 just pops up.
 12 The reason that it was Halabi
 13 that testified to this was because he would
 14 not be identified as an Israeli investigator.
 15 He was known as a journalist who wrote for
 16 local newspapers in the Emirates. And he
 17 volunteered. And this pleased the client,
 18 the customer. And -- and Halabi said that
 19 he told Stuart this and that wasn't a lie.
 20 And that didn't embarrass the customer.
 21 BY MR. BEHRE:
 22 Q. But Halabi is Israeli; right?
 23 A. Halabi is an Israeli Druze, who
 24 has an Arab name. Arab -- his name sounds
 25 Arab.

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1 A. I read Halabi's affidavit.
 2 He says we had at least four meetings
 3 to coordinate this thing, including
 4 visits in London to a number of places,
 5 including in Cyprus. And I can say
 6 unequivocally that he is lying.
 7 And, in Israel, there's no
 8 way to leave or come back into the
 9 country without having some record of
 10 it at the -- by the borders authority.
 11 And I can state that, on the
 12 dates that he says I met with him in
 13 London and in Cyprus, I was in Israel.
 14 I can only guess why he's lying.
 15 Q. Well, with regard to his
 16 admission, his confession that he lied
 17 in court about finding the link, you
 18 don't know of any reason why he would
 19 lie about that, do you?
 20 A. I -- I don't think he lied to
 21 the Court. But as far as his affidavit
 22 is concerned, it's riddled with lies.
 23 And I -- I can't say right now
 24 exactly what. But I can say that, on the
 25 dates that he says I was in London or in

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1 So there's a difference between
 2 coming with a name like mine or a typical
 3 Israeli name or having a name like Majdi
 4 Halabi, which is a very common name in
 5 Syria, Iraq, in fact, the whole Middle
 6 East.
 7 Q. Why was it so important not to
 8 focus on the nationality of the speaker?
 9 A. At the time, Israel didn't have
 10 diplomatic relations with the UAE. And
 11 according to what Stuart said, it was very
 12 worrying to the client that it might be --
 13 become known that he was using an Israeli
 14 contractor. He thought at that time that
 15 his enemies would use this information
 16 to topple him.
 17 Q. And Halabi didn't really find
 18 the links, did he?
 19 A. I don't know. As I said -- as
 20 I said, it popped up for everyone. And
 21 you didn't need to be an analyst with a
 22 Harvard education to figure it out.
 23 Q. But Halabi now says that was
 24 all a lie.
 25 You're aware of that; right?

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1 Cyprus, I can say for a fact that I wasn't.
 2 Q. And I'm just focusing on the
 3 fact that Halabi now confesses that he
 4 lied to the Court about finding the links.
 5 And you have no reason to
 6 believe that that confession was itself
 7 a lie, because why would somebody confess
 8 to the crime of misleading a Court and
 9 perjury if they hadn't done it?
 10 A. If a client -- if I have a client
 11 that would ask me to investigate why he was
 12 lying, then I'll investigate. But I don't
 13 know why.
 14 Q. Now, you testified earlier that
 15 you're involved in private investigation;
 16 correct?
 17 A. Yes.
 18 Q. And you don't provide IT services,
 19 do you?
 20 A. I provide a security envelope
 21 for computers, not necessarily IT, not
 22 what you call IT.
 23 We've, for example, developed
 24 a telephone that can't be tapped into and
 25 all kinds of technological developments.

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1 Q. (Not translated.) But with regard
2 to Project Beech, you didn't provide any IT
3 security other than the open-ended e-mail
4 system where you put the reports; right?

5 A. I did provide -- in Project Beech,
6 I actually did provide consultation services
7 regarding communication security.

8 Q. But that was a very small part
9 of what you did for Project Beech; right?

10 A. It was part. I can't define it
11 as big or small.

12 Q. (Not translated.) But several
13 times today, I've asked you what you did
14 for the two or \$300,000.

15 And you never mentioned that
16 service; right?

17 You just talked about doing
18 these investigations in all these
19 different countries.

20 But you never once mentioned
21 IT security, did you?

22 A. It's much easier to describe
23 what happens in an investigation than
24 to -- than to explain IT security. But
25 we did do it.

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1 A. Not correct.

2 First of all, I mentioned that
3 sometimes we had problems with money
4 transfers and that we sometimes made all
5 sorts of engagements in order to resolve
6 that problem.

7 Second, I do not -- do not see
8 here any signature of mine or anyone on
9 my behalf.

10 And, thirdly, once I finish
11 reading this -- I'm in the process of
12 reading it -- perhaps I will understand
13 what this is connected to. Because it
14 definitely is not connected to the Beech
15 Project.

16 Q. Okay. Well, take your time to
17 read it, then.

18 A. (Examining.) I do not see here
19 any connection neither to SDC-Gadot nor
20 to the Beech Project. And I do not see
21 any signature of Gadot on this document.

22 MR. BARET: Just for the record,
23 this -- the -- this agreement is prior to
24 the creation of Gadot SDC, which is about
25 a year and change --

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1 Q. But much of what you did for
2 Project Beech was not IT security; right?

3 A. I can't exactly tell you what
4 proportion. But it was part of the scope
5 of work. And I wouldn't call it IT security
6 in any case. It was more security protocols
7 for computer, communications, and transfers.

8 (Exhibit 5 marked.)

9 BY MR. BEHRE:

10 Q. (Not translated.) Okay. I'd
11 like to show you what we've marked as
12 Exhibit No. 5, which is a letter of
13 engagement between you, on behalf of
14 Gadot Information Services, and Page
15 Group Limited.

16 Previously you testified that
17 there was no written agreement between
18 you and Mr. Page; correct?

19 A. (In English.) Correct.

20 (Last question translated.)

21 THE WITNESS: Correct.

22 BY MR. BEHRE:

23 Q. So your testimony previously
24 that there was no written agreement is
25 inaccurate; correct?

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1 MR. BEHRE: Correct.

2 MR. BARET: -- a year -- a year
3 and a half probably before.

4 BY MR. BEHRE:

5 Q. So it's -- you don't recall seeing
6 this before?

7 A. No.

8 Q. You don't recall signing it?

9 A. I am not a signatory to this
10 document.

11 Q. Okay. And its -- its content
12 is inaccurate, isn't it?

13 A. The content could be accurate,
14 because we are engaged in such projects.

15 But this does not refer neither
16 to the dates of the U.S. companies nor to
17 the Beech Project. As I said before, we
18 did other things for Stuart Page as well.

19 Q. Well, this one provides for
20 almost two years of payments, the monthly
21 amount to be a hundred and fifty to 200,000
22 pounds, which equates to two hundred to two
23 fifty [sic] U.S. dollars per month; right?

24 A. This is what is written here.
25 But to the best of my recollection, these

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1 are not the amounts that we received from
2 Stuart Page to Gadot.
3 And I repeat again, this has no
4 connection whatsoever to SDC-Gadot or to
5 Project Beech.
6 Q. Well, it refers, in the second
7 paragraph, to IT services for Page Group's
8 United Arab Emirates and Iraq clients.
9 Page Group's United Arab Emirates
10 client was RAK and the ruler of RAK, the
11 boss; right?
12 A. RAK was not Stuart Page's only
13 client in the Emirates.
14 Q. And you indicated that the
15 reason SDC-Gadot was created was because
16 of difficulty that Mr. Page was experiencing
17 in wiring money to Gadot Information
18 Services; right?
19 A. When he was trying to transfer
20 funds from Dubai to Gadot Information
21 Services. When he was transferring
22 from London, there was no problem.
23 (Exhibit 6 marked.)
24 BY MR. BEHRE:
25 Q. I'd like to next show you what's

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1 "beach."
2 Q. But other than the spelling mistake,
3 they all concern Project Beech; right?
4 A. Correct.
5 Q. And the first two invoices state,
6 in the second line of the "Description,"
7 "according to agreement"; correct?
8 A. Yes. Correct.
9 Q. What agreement is that?
10 A. We would usually add this
11 particular sentence because that would
12 make the bank pay more easily.
13 Q. So that would mislead the bank
14 into thinking there was an agreement when
15 there wasn't an agreement; correct?
16 A. There was no written agreement.
17 But even an oral agreement is an agreement.
18 Q. Were these invoices provided to
19 the bank in the case of the first invoice
20 to JP Morgan Chase?
21 A. I don't recall. It could be.
22 But -- I don't recall. It could be. But
23 I don't think that we supplied invoices
24 to the American bank.
25 Q. What bank were you providing

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1 been marked as Exhibit No. 6. And this
2 consists of seven invoices from SDC-Gadot
3 LLC to Page Group.
4 A. (Examining.) So I don't need
5 to bring them tomorrow?
6 Q. This might not be all of them.
7 A. May I keep this to compare?
8 MR. BARET: Yeah. That's yours.
9 MR. BEHRE: No. That's the court
10 reporter's.
11 MR. BARET: No, no.
12 MR. BEHRE: But you -- that's yours.
13 MR. BARET: We have. We have.
14 THE WITNESS: (In English.) Okay.
15 (Translated.) So what's the
16 question?
17 BY MR. BEHRE:
18 Q. Do you recognize these invoices?
19 Are they issued by SDC-Gadot, as indicated?
20 A. Yes.
21 Q. And you'll note that each one of
22 these invoices, in the "Description" area
23 says the payment requested is for Project
24 Beech; correct?
25 A. Yes. With a spelling mistake in

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1 invoices to?
2 A. Normally to the Israeli bank.
3 Q. And I note, in the first two
4 invoices, that the address provided for
5 SDC-Gadot in Miami Beach is not the same
6 as the one that is contained in your
7 corporate records, is it?
8 A. I have to check that. I have
9 no answer right now why is it so.
10 Q. Whose address is 3200 Collins
11 Avenue, as indicated in the two invoices?
12 A. I think -- I think -- I seem to
13 remember that we may have rented, in the
14 beginning, a physical mailbox. But it's
15 not something that I remember precisely.
16 Q. So the first invoice in Exhibit
17 6 is numbered Invoice 1019.
18 Do you see that?
19 A. Yes.
20 Q. The second -- the second invoice
21 is numbered Invoice 1024. And that -- and
22 it's dated May 14, 2019.
23 Whereas, the first invoice is
24 dated November 6, 2018; correct?
25 A. Yes.

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1 Q. So it would appear, between
2 November 18th -- November 2018 and May
3 2019, there were only four other invoices
4 that were issued by SDC-Gadot in six months;
5 correct?

6 A. It is apparently correct. I
7 have to check. It is also possible that
8 the collection of funds due for the project
9 was done for Insight.

10 I can see that the 1024 was issued
11 twice to JP Morgan and to Citibank as well.
12 It would seem that we did not succeed in
13 operating the account correctly at JP Morgan
14 and that is why we -- we did it in Citibank.
15 It's the same number.

16 Q. And you're referring to the third
17 invoice dated May 14th, 2019, on the third
18 page of the Exhibit 6; right?

19 A. Yes.

20 Q. And that particular invoice looks
21 like it's been cut and pasted. If you look
22 at the -- the area right below the line at
23 the top of the page, that clearly was cut
24 and pasted from some other document and
25 placed on this.

1 two pertaining to Beech.

2 Q. (Partially translated.) Okay.
3 On the third invoice, the third page of
4 the Exhibit 6, it looks like SDC-Gadot
5 has gone deluxe and they have their own
6 stamp; is that right?

7 THE INTERPRETER: They've gone
8 to?

9 MR. BARET: They're what?

10 THE INTERPRETER: They've gone
11 to?

12 MR. BEHRE: They have their own
13 stamp.

14 THE COURT REPORTER: "Gone deluxe."

15 THE INTERPRETER: Hmm?

16 THE COURT REPORTER: "Deluxe."
17 "Deluxe." "Deluxe."

18 MR. BARET: "Deluxe." Oh, okay.

19 THE INTERPRETER: Okay.

20 (Pending question fully translated.)

21 THE WITNESS: Look at the amounts
22 that we started receiving.

23 MR. BARET: So it has a New York,
24 New York.

25 //

1 A. To me -- to me it seems that
2 we simply started using another software
3 for issuing invoices. But since I did not
4 supply it, I -- I don't know who supplied
5 it.

6 Q. Let me just go back to the invoice
7 numbers again.

8 In November 2018, you're on Invoice
9 1019. In May 2019, six months later, you're
10 only on Invoice 1024.

11 That means SD -- SDC-Gadot only
12 issued four invoices between those two in
13 six months; right?

14 A. If you give me a minute, I'll
15 go over it. I'll see all the entries
16 from the bank.

17 (Examining.) Yes. There are
18 very few entries indeed.

19 Q. Meaning that SDC-Gadot didn't
20 issue many invoices that weren't related
21 to Project Beech; correct?

22 A. Are you talking about the entire
23 period or only about these four months?

24 Q. It's six months. But yes.

25 A. Out of five invoices, there are

1 BY MR. BEHRE:

2 Q. And who -- who obtained that stamp?

3 A. I believe we probably bought it
4 in some shop.

5 Q. And why is it only used on that
6 one particular invoice, if you know?

7 A. Perhaps we lost it afterwards.
8 I really don't know.

9 Q. Do you have any other invoices
10 besides the ones you've seen here?

11 A. Tomorrow. I have to check.
12 I have nothing on me here.

13 MR. BARET: I should have been
14 a doctor. I should have been a doctor.
15 (Exhibit 7 marked.)

16 BY MR. BEHRE:

17 Q. I'm showing you next -- showing
18 you next more Gadot invoices. It appears
19 to be 18 in number. And these are 18
20 invoices issued in 2016 through August
21 2017.

22 A. In August 2016 to August 2017,
23 the U.S. companies were not set up yet.

24 Q. Correct.

25 But I'm directing your attention

1 to the "Description" line where we just
 2 looked at a draft contract that you said
 3 you didn't recall. And yet these invoices
 4 all say:
 5 "IT security services Beech
 6 Project."
 7 Do you see that?
 8 A. (Examining.) Yes.
 9 Q. And come 2017, the difficulties
 10 you were having with getting wire transfers
 11 caused these to stop and you to use SDC-Gadot;
 12 correct?
 13 A. No. The transfers by Stuart from
 14 Dubai to Israel were not possible.
 15 Q. (Partially translated.) Well, the
 16 Stuart company is Page Protective Services.
 17 And they have an address in Hong
 18 Kong; right?
 19 A. To the best of my understanding,
 20 we had agreed that we would focus on the
 21 U.S. companies. And because you came
 22 all the way from the United States, I
 23 was happy to expand and give you some
 24 further information beyond what we had
 25 originally agreed upon.

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1 no.
 2 Q. We talked earlier about Avi,
 3 who's pled guilty in New York to hacking;
 4 correct?
 5 A. Correct.
 6 Q. And in your case in Florida,
 7 you filed some text messages between
 8 you and Stuart Page in that case.
 9 Do you remember that?
 10 A. You mean about Avi's case?
 11 Q. (Not translated.) Well, I'm
 12 asking about a series of text message
 13 exchanges between you and Stuart Page.
 14 Do you remember that was attached
 15 to your filing in the U.S. District Court
 16 in Florida?
 17 A. But it's not connected to Avi.
 18 (Exhibit 8 marked.)
 19 BY MR. BEHRE:
 20 Q. Okay. Well, let -- let me show
 21 it to you.
 22 I'm going to show you Exhibit 5
 23 to your motion for protective order. And
 24 it's -- and it's -- it was filed electronically
 25 in U.S. District Court in Florida on June

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1 We are -- are in the midst of a
 2 procedure vis-a-vis the Court to determine
 3 what can be asked and what cannot be asked.
 4 And these questions relate to Gadot Israel.
 5 Q. (Not translated.) What is Project
 6 Silk?
 7 THE COURT REPORTER: Project?
 8 BY MR. BEHRE:
 9 Q. (Not translated.) What is Project
 10 Silk?
 11 THE INTERPRETER: "Silk"?
 12 MR. BEHRE: Like the fabric.
 13 (Pending question translated.)
 14 THE WITNESS: Another project
 15 which is not connected to the -- to the
 16 client.
 17 BY MR. BEHRE:
 18 Q. Does it involve Khater Massaad?
 19 A. If the truth be told, I do not
 20 remember fully. But generally speaking,
 21 everything that was related to Khater
 22 Massaad went into the Beech Project.
 23 Q. But Project Silk might have
 24 involved Khater Massaad?
 25 A. To the best of my recollection,

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1 14th, 2022. And it's Document 26-5. It
 2 was filed by you through your counsel.
 3 A. Okay. (Examining.)
 4 Q. You had a chance to look at that?
 5 A. Yes.
 6 Q. Directing your attention to the
 7 last page of the e-mail exchange.
 8 MR. BARET: WhatsApp. WhatsApp.
 9 MR. BEHRE: I'm sorry?
 10 MR. BARET: I think it's, like,
 11 a WhatsApp.
 12 MR. BEHRE: WhatsApp. I'm sorry.
 13 BY MR. BEHRE:
 14 Q. Is this WhatsApp?
 15 A. (In English.) Yeah.
 16 (Translated.) Yes.
 17 Q. And you recently pulled this off
 18 of your WhatsApp so your lawyer could file
 19 it in court; right?
 20 A. It wasn't recent. I -- I had
 21 saved it in the past as a picture.
 22 Q. And have you saved any other
 23 WhatsApps between you and Stuart Page?
 24 A. I have to scan and see.
 25 Q. Okay. And will you do that?

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1 A. Yes.

2 Q. On the last page, you indicate --

3 and this is part of your -- the carry-over

4 statement:

5 "As you know, I'm not really

6 in the business since what happened"

7 to "Avi." (As read.)

8 What did you mean by that?

9 A. In my -- my meaning was that

10 it's a -- it's a date that we are both

11 familiar with. It's a date that indicates

12 more or less when the activity in Israel

13 went down. But it went down mostly because

14 of COVID.

15 Besides, what happened to Avi,

16 in my opinion, it's some type of miscarriage

17 of justice. But it is not connected to --

18 to this.

19 Q. Well, what happened to Avi is

20 Avi got arrested; right?

21 A. I don't even recall if I meant

22 this Avi when I'm saying "Avi" here,

23 because the other guy is Aviram, not

24 Avi. So I'm not even sure that I'm

25 referring to the same person.

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1 translation on that, did he?

2 (Last question translated.)

3 THE WITNESS: First and foremost,

4 the person who was arrested was Aviram and

5 not Avi. And, second, there's no connection.

6 And, thirdly, I'm corresponding

7 here with a person who is libeling me.

8 So what do you expect?

9 BY MR. BEHRE:

10 Q. (Not translated.) Would it

11 surprise you if Stuart Page was certain

12 you were talking about the Avi who's

13 arrested for hacking?

14 MR. BARET: You don't have

15 to talk about this.

16 He doesn't need to --

17 MR. BEHRE: Why not?

18 MR. BARET: -- address this.

19 MR. BEHRE: What's that?

20 MR. BARET: Again, this was

21 provided to the Court with a motion for

22 protective order not to depose Amit Forlit

23 in his personal capacity. It's got nothing

24 to do with SDC-Gadot.

25 Again, you are confusing two --

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1 (Comment in Hebrew.)

2 MR. BARET: You don't have to

3 talk about that.

4 THE INTERPRETER: "Furthermore,

5 my correspondence here -- here with Stuart

6 is -- well, never mind."

7 BY MR. BEHRE:

8 Q. (Not translated.) Well, the

9 "I'm not really in the business since

10 what happened to Avi," Avi was arrested

11 and charged with hacking. Avi's pled

12 guilty and confessed to hacking. And he

13 was in the business of hacking.

14 And the business you're referring

15 to is hacking, isn't it?

16 A. (In English.) No.

17 THE COURT REPORTER: You said

18 "yeah"? "No"?

19 THE INTERPRETER: "No."

20 THE WITNESS: (In English.) "No."

21 THE INTERPRETER: He said "no."

22 THE COURT REPORTER: Okay. Let

23 her translate.

24 THE INTERPRETER: Okay.

25 MR. BEHRE: He didn't need a

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1 two different filings. This -- this was

2 filed with a motion for protective order.

3 And you are bypassing our request for

4 protection order.

5 MR. BEHRE: No. It was. It

6 was filed in Federal Court.

7 MR. BARET: Correct.

8 MR. BEHRE: It was filed on

9 PACER via electronic --

10 MR. BARET: Correct.

11 MR. BEHRE: -- means.

12 MR. BARET: For the purpose of --

13 MR. BEHRE: And it's -- it's --

14 it's arguably a statement about his business,

15 which is the same as Avi's, which is hacking.

16 MR. BARET: He's -- he's --

17 MR. BEHRE: Now --

18 MR. BARET: He answered that.

19 MR. BEHRE: -- if you want to --

20 if you want to say that that's not something

21 we can reach, you can say it.

22 MR. BARET: I'm saying it.

23 MR. BEHRE: But it's going to

24 be an -- okay. Then you've instructed

25 him not to answer; right?

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1 MR. BARET: I'm instructing
 2 him not to talk about this, because this
 3 is -- relates directly to his motion for
 4 protective order not to be deposed in his --
 5 MR. BEHRE: Well, he --
 6 MR. BARET: -- personal --
 7 MR. BEHRE: -- opened --
 8 MR. BARET: -- capacity.
 9 MR. BEHRE: -- the door -- he
 10 opened the door to this. And if you want
 11 this to go before the judge in Florida, we
 12 can do that. But, you know -- you know how
 13 that judge has already started to view him.
 14 So if you want --
 15 MR. BARET: Because --
 16 MR. BEHRE: -- to instruct him not
 17 to answer, you -- you -- be my -- if -- if
 18 that's your instruction, you go ahead.
 19 MR. BARET: He answered. But I
 20 think this line of questioning is inappropriate
 21 for the purpose of this deposition.
 22 MR. BEHRE: Okay. I'll move on.
 23 And we can raise it with the Court. Okay?
 24 (Exhibit 9 marked.)
 25 //

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1 record at 6:03.
 2 (Recess from 6:03 p.m. to 6:12 p.m.
 3 Israel Daylight Time.)
 4 THE VIDEOGRAPHER: Back on record
 5 at 6:12.
 6 BY MR. BEHRE:
 7 Q. (Not translated.) Mr. Forlit,
 8 you indicated you might have some documents.
 9 Just so we're clear, do you have
 10 any copies of the project updates left?
 11 A. (In English.) No.
 12 (Exhibit 10 marked.)
 13 BY MR. BEHRE:
 14 Q. I'd like to show you what we're
 15 going to mark as Exhibit No. 10. It's --
 16 it's labeled or titled:
 17 "Project Beech Report - Farhad
 18 Azima."
 19 A. (Examining.)
 20 MR. BARET: Looks good for his
 21 age, actually.
 22 MR. BEHRE: What?
 23 MR. BARET: He looks good for
 24 his age.
 25 //

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1 BY MR. BEHRE:
 2 Q. I'm showing you next what we're
 3 marking as Exhibit 9. It's a September 7,
 4 2019, e-mail from your banker at Citi.
 5 His name is Mario Ros, R-o-s. And it's
 6 regarding your account with Citi.
 7 A. (Examining.)
 8 Q. Do you recognize that exhibit?
 9 A. Yes. But I do not remember this
 10 mail.
 11 Q. And Mr. Ros at Citibank is e-mailing
 12 you because at least he believes you're the
 13 person responsible for that bank account
 14 that we talked about earlier today; right?
 15 A. He's trying to sell some banking
 16 service.
 17 MR. BEHRE: Okay. Why don't we
 18 take a quick break.
 19 THE WITNESS: (Comment in Hebrew.)
 20 MR. BARET: I think we're done
 21 with our -- today. It was set for -- from
 22 11:00 to 6:00.
 23 MR. BEHRE: 7:00.
 24 MR. BARET: Till 7:00?
 25 THE VIDEOGRAPHER: Going off the

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1 BY MR. BEHRE:
 2 Q. Have you had a chance to look
 3 at that report?
 4 A. Yes.
 5 Q. And this is one of the Project
 6 Beech reports, isn't it?
 7 A. I can't tell. I did not keep
 8 it.
 9 Q. Well, you were involved in its
 10 authorship, weren't you?
 11 A. This is -- this is dated four --
 12 August 4, 2015 -- 2015. It's, like, seven
 13 years. And I -- we have not kept any record.
 14 We have destroyed everything. So I can't
 15 tell.
 16 Q. Well, at 11:24 this morning, you
 17 stated as follows:
 18 "I have never investigated Farhas --
 19 Farhad Azima. The investigation was of
 20 Dr. Khater Massaad."
 21 A. Correct.
 22 Q. And this report starts and states
 23 as follows:
 24 "The following document presents
 25 a full intelligence report on Farhad Azima."

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1 And he's -- and he's given the
 2 nickname of "the Generator"; right?
 3 The second line.
 4 A. I say, once again, I do not know
 5 who wrote this report.
 6 Q. And the third line states -- and
 7 I'll quote:
 8 "The main effort is placed in
 9 order to assist the client in taking the
 10 generator out of the dispute between KM
 11 and the client."
 12 End quote.
 13 (Brief telephone interruption.)
 14 BY MR. BEHRE:
 15 Q. So this report talks about taking
 16 out Farhad Azima, doesn't it?
 17 A. I did not go through it thoroughly
 18 right now. It's possible that there is
 19 a report. But I'm saying again, I do not
 20 know who wrote this report.
 21 Q. Well, let me direct your attention
 22 to a few things.
 23 Look at page 3. There's a --
 24 MR. BARET: Again, same objection
 25 as before.

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1 "I have never investigated Farhad
 2 Azima," period.
 3 MR. BARET: True. And he said --
 4 MR. BEHRE: This --
 5 MR. BARET: And he --
 6 MR. BEHRE: -- report establishes
 7 that not only did they investigate Farhad
 8 Azima --
 9 MR. BARET: Who's "they"?
 10 MR. BEHRE: -- they targeted him.
 11 MR. BARET: Who's "they"?
 12 MR. BEHRE: This report was written
 13 by your client.
 14 MR. BARET: He's -- he's saying he
 15 didn't write it.
 16 MR. BEHRE: He can say that. But
 17 I can ask him about it.
 18 MR. BARET: But he already answered --
 19 MR. BEHRE: He can --
 20 MR. BARET: -- it.
 21 MR. BEHRE: -- deny it under oath,
 22 if he'd like.
 23 MR. BARET: He just did.
 24 MR. BEHRE: But that doesn't prevent
 25 me from asking the questions.

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1 He answered some questions regarding
 2 this report. He said he didn't write it or
 3 know whose write it. [sic] It's -- again,
 4 it's not SDC-Gadot. It's two years before
 5 the cooperation of which has been represented
 6 today was created.
 7 If you get a chance to depose --
 8 MR. BEHRE: His --
 9 MR. BARET: -- him on a personal
 10 level, then we can go back --
 11 MR. BEHRE: He opened the door.
 12 He opened the door to this by saying:
 13 I never --
 14 MR. BARET: SDC --
 15 MR. BEHRE: -- investigated --
 16 MR. BARET: -- Gadot -- SDC --
 17 MR. BEHRE: Hold on.
 18 MR. BARET: -- Gadot --
 19 MR. BEHRE: No, no, no.
 20 MR. BARET: -- didn't open --
 21 MR. BEHRE: No.
 22 MR. BARET: -- the door. It's
 23 SDC-Gadot.
 24 MR. BEHRE: Let me read you the
 25 quote.

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1 MR. BARET: It -- it does, because --
 2 MR. BEHRE: So if you want to -- if
 3 you want to instruct him not to answer, we'll
 4 do this some more.
 5 Is that what -- are you instructing
 6 him --
 7 MR. BARET: I'm --
 8 MR. BEHRE: -- not to answer?
 9 MR. BARET: I'm saying that it's
 10 not the subject of today's deposition.
 11 MR. BEHRE: It is --
 12 MR. BARET: It's not --
 13 MR. BEHRE: -- because --
 14 MR. BARET: -- the subject --
 15 MR. BEHRE: Let me tell you why
 16 it is.
 17 Because he opened the door to it.
 18 By saying he didn't investigate Farhad Azima,
 19 he can be impeached with his own report --
 20 MR. BARET: But that's not his
 21 report.
 22 MR. BEHRE: -- that proves that
 23 he lied earlier today about investigating
 24 Farhad Azima.
 25 MR. BARET: That's what you're

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1 saying. He's saying --
 2 MR. BEHRE: I -- it is --
 3 MR. BARET: -- he didn't write --
 4 MR. BEHRE: -- what I'm saying.
 5 MR. BARET: -- this -- but he's
 6 saying he didn't write this report.
 7 Do you have any --
 8 MR. BEHRE: Well, he can --
 9 MR. BARET: -- proof --
 10 MR. BEHRE: -- he can say --
 11 MR. BARET: -- that he wrote
 12 this report?
 13 MR. BEHRE: -- that all he wants.
 14 MR. BARET: He just did.
 15 MR. BEHRE: But I can examine,
 16 because it's a deposition.
 17 If you want to instruct him not
 18 to answer, be my guest. And we'll do this
 19 all again. And we will seek costs for
 20 this entire trip.
 21 MR. BARET: All I'm saying is
 22 that he answered it, that he said he's --
 23 it's not his report. Now, if he wants
 24 to continue answering, it's his choice.
 25 Go ahead, answer.

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1 Q. And if you look at page 12 and
 2 13, there's extracts of financial data
 3 regarding business opportunities that
 4 the, quote, "Generator," was involved
 5 in.
 6 And the same on page 14 and
 7 15 and 16, all stolen financial data.
 8 And then on page 18, there's another
 9 stolen passport.
 10 And then on page 21, another
 11 stolen passport. And 22, another stolen
 12 passport. And 24, another stolen passport
 13 and a driver's license.
 14 And then on page 27, extracts
 15 of his stolen e-mails, from Farhad Azima.
 16 Do you see that stolen e-mail
 17 that's embedded in this report?
 18 A. Yes.
 19 Q. More stolen e-mails on 30 -- page
 20 30 and 31 and 32 and 33.
 21 Where did these e-mails come from?
 22 A. I do not know. I can estimate
 23 that, based on all his e-mails that were
 24 leaked, someone prepared that report.
 25 Q. Well, this is almost a year

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1 BY MR. BEHRE:
 2 Q. (Not translated.) So if you look
 3 at page 3, there's what clearly appears to
 4 be a stolen copy of Farhad Azima's passport.
 5 If you look at page 6, you'll see --
 6 THE INTERPRETER: May I? Counsel,
 7 may I?
 8 (Last comment translated.)
 9 BY MR. BEHRE:
 10 Q. If you look at page 6, there
 11 is data about the specific balance, down
 12 to the U.S. dollar, in his bank accounts,
 13 stolen financial data.
 14 And if you look at page 7, there's
 15 more stolen financial data about his brokerage
 16 accounts at HSBC and Credit Suisse, right
 17 down to the dollar.
 18 Do you see that?
 19 A. Yes.
 20 Q. Look at page 10 and 11.
 21 Did you prepare these organizational
 22 charts, or people under your direction?
 23 A. No.
 24 Q. Do you know who did?
 25 A. No.

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1 before the data was placed on the Internet.
 2 The date --
 3 A. If you believe what is written
 4 here.
 5 Q. The date?
 6 A. Yes.
 7 Q. So you think this is a falsified
 8 date?
 9 A. I don't know. I have no clue.
 10 Q. Well, at 11:41 this morning, you
 11 said that the reports you wrote started with
 12 an executive summary; right?
 13 A. Correct.
 14 Q. And you also stated that they were
 15 followed by a breakdown of the findings of
 16 the investigation; correct?
 17 A. Correct.
 18 Q. And that's exactly what this report
 19 does, doesn't it?
 20 A. I also said that I -- I sent them
 21 in an open format to Mr. Stuart Page. And
 22 I also said that I did not retain any report.
 23 Q. Were you involved in writing this
 24 report?
 25 A. No.

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1 Q. A few minutes ago, you said you --
2 you weren't sure one way or the other.
3 Why are you now sure you weren't
4 involved in it?

5 A. Because I see that this is a
6 report of an investigation on Farhad Azima.
7 And we never investigated Farhad Azima.
8 (Exhibit 11 marked.)

9 BY MR. BEHRE:

10 Q. (Partially translated.) I'm
11 showing you next what has been marked
12 as Exhibit No. 11. It's entitled:

13 "Project Beech - Comprehensive
14 Action Plan."

15 It's dated January 26, 2016.

16 THE INTERPRETER: What's the
17 date?

18 MR. BEHRE: January 26, 2016.

19 Please --

20 (Remainder of pending question
21 translated.)

22 THE WITNESS: (Examining.)

23 BY MR. BEHRE:

24 Q. Have you had a chance to read
25 that?

1 A. First of all, I don't remember
2 if this report was even produced by us.
3 And by "attack," it means an intelligence
4 attack.

5 Q. (Not translated.) Previously
6 you said that Farhad Azima was not
7 investigated.

8 A. And that's why I have doubts
9 as to whether this is indeed a report
10 that we produced.

11 Q. Look at the third page. Quote:
12 "We have been supplying the
13 client with intelligence 'ammunition'
14 against KM and other relevant players
15 such as SI and FA."

16 End quote.

17 "FA" is Farhad Azima, isn't it?

18 A. I don't know who the "we" is.

19 Q. Look at page 6. The heading is
20 entitled:

21 "PR and Media Tools against FA."
22 Do you see that?

23 A. Yes.

24 Q. And you can see there that it's
25 talking about, in the second paragraph:

1 A. (In English.) Yeah.
2 (Translated.) Just I scanned
3 through it as quickly as I could.

4 Q. And that's one of the Project
5 Beech reports you prepared, isn't it?

6 A. I have no way of knowing, because
7 I didn't keep any of the documents. It's
8 possible that we prepared part of it and
9 parts of it were added by Stuart afterwards.
10 I have no way of knowing.

11 Q. Directing your attention to the
12 second page, there's a photograph embedded
13 in this graph, or this chart, with a
14 photograph of Farhad Azima and Khater
15 Massaad.

16 Do you see that?

17 A. Yes.

18 Q. And the legend of the chart says
19 those items in red suggest targets for
20 future attack.

21 Do you see that?

22 A. Yes.

23 Q. And so not only was Mr. Azima
24 being investigated, he was being targeted
25 and attacked, wasn't he?

1 "There are other issues
2 that can be" effectively -- "effective
3 regarding FA's reputation and even
4 pose him a criminal exposure." (As read.)
5 End quote.

6 Do you see that?

7 A. Yes.

8 Q. So it's clear, from that entry
9 at this page 6, that Farhad Azima was
10 being investigated, he was being targeted,
11 and he was being exposed as a potential,
12 having criminal liability.

13 Do you see that?

14 A. I didn't say he wasn't. I just
15 said that I and the people that I represent
16 didn't do it. Fact -- it -- the fact is
17 that somebody hacked him.

18 Q. Look at page 7.

19 "We have access to a groundbreaking
20 technology."

21 And that's a quote.

22 That groundbreaking technology
23 was hacking, wasn't it?

24 A. No. First of all, I don't know
25 who wrote this document and who has this

1 technology. And if somebody has hacking
 2 ability, they just write that they can
 3 hack.
 4 Q. And then on page 9, the war
 5 terms continue:
 6 "In order to eliminate FA's
 7 activity" against the -- "regarding
 8 the client," it says. (As read.)
 9 Do you see that?
 10 A. Where is it approximately on
 11 the page?
 12 Q. (Not translated.) Page 9 --
 13 THE INTERPRETER: Page --
 14 BY MR. BEHRE:
 15 Q. (Not translated.) -- under:
 16 "5. Involvement of" the "U.S.
 17 Relevant Authorities." (As read.)
 18 A. This looks like a strategic document
 19 that somebody prepared. And this -- this
 20 is not a subject we deal with.
 21 Q. Well, not only does this document
 22 entitled "Project Beech" --
 23 MR. BARET: Excuse me. That's
 24 not what he said.
 25 He said: "It's not our document."

1 and leaked his computers.
 2 And based on the procedures
 3 that are used in the U.S., I think you
 4 know who it is.
 5 Q. And who would that be?
 6 A. Nick Del Rosso. According --
 7 based on the proceedings against Nick
 8 Del Rosso, I conclude that.
 9 Q. And what's your basis for
 10 saying Nick Del Rosso is the party who
 11 wrote this report?
 12 Is that what you're saying?
 13 A. I didn't say Nick Del Rosso
 14 wrote this report. I said that we did
 15 not write this report.
 16 And based on all the proceedings
 17 that are being carried out, the person
 18 who is responsible for the hack and the
 19 leaks of the hacking is Nick Del Rosso.
 20 Q. Now, you indicated that Nick
 21 Del Rosso and Stuart Page did not get
 22 along; right?
 23 A. I heard from Stuart that he
 24 didn't like, to put it mildly, Nick Del
 25 Rosso. But I -- I didn't even know if

1 THE INTERPRETER: Aah, you're right.
 2 Thank you.
 3 MR. BARET: Okay.
 4 THE INTERPRETER: "And it's not our
 5 document."
 6 Thank you.
 7 BY MR. BEHRE:
 8 Q. This document is labeled:
 9 "Project Beech."
 10 You were involved in Project Beech.
 11 And this establishes, just like the last
 12 document, contrary to your testimony, that
 13 Farhad Azima was not only being investigated,
 14 he was being attacked, he was being targeted,
 15 and he was in jeopardy because of that.
 16 Isn't that right?
 17 A. As I said, my reports on Project
 18 Beech were sent to Stuart Page in an open
 19 format. I don't know who else Stuart used
 20 the name Project Beech with. He made up
 21 that name.
 22 I know that we did not investigate
 23 Farhad Azima. We did not target him as
 24 a target. But it's quite clear that
 25 somebody did, because somebody hacked

1 they knew each other.
 2 Q. And the reason Stuart Page
 3 didn't like Nick Del Rosso is because
 4 Stuart Page thought Nick Del Rosso was
 5 taking business away from Stuart Page;
 6 correct?
 7 A. I don't know.
 8 Q. (Not translated.) Nick Del
 9 Rosso didn't report to Stuart Page,
 10 did he, because they hated each other?
 11 A. To the best of my knowledge,
 12 no.
 13 Q. And so, therefore, Nick Del
 14 Rosso is not a likely suspect for the
 15 content of this report, since he would
 16 have had to give it to his archenemy,
 17 Stuart Page, to incorporate it in the
 18 report; right?
 19 A. (Translated.) I'm not attributing
 20 this report to anyone's authorship. I'm
 21 just saying that we didn't write it and
 22 we did not investigate --
 23 (In English.) Farhad Azima.
 24 THE INTERPRETER: Sorry. It's
 25 late.

1 MR. BARET: Say "FA." Just
 2 use --
 3 THE INTERPRETER: "FA."
 4 MR. BARET: -- "FA."
 5 THE INTERPRETER: Yeah. It's
 6 late in the day.
 7 BY MR. BEHRE:
 8 Q. Stuart Page paid you millions
 9 of dollars and your company, including
 10 SDC-Gadot; correct?
 11 A. That is correct.
 12 Q. And -- and he paid you to
 13 perform work for Project Beech; correct?
 14 A. Yes, he paid me. But I don't
 15 know how much he charged for it. I don't
 16 know what proportion of what he got he
 17 paid me.
 18 The bottom line is I don't know
 19 what reports were submitted to the client.
 20 I know what I sent to Stuart Page. But
 21 I don't know what he submitted afterwards.
 22 Q. Do you know what portion of this
 23 particular report, Exhibit 11, you provided
 24 to Stuart Page?
 25 A. No. We don't have any documentation

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1 in your presence?
 2 MR. BARET: Yes.
 3 MR. BEHRE: Okay. One second. I'm
 4 almost done. Okay. That's all I have. Thank
 5 you very much.
 6 THE VIDEOGRAPHER: Going off the
 7 record at 6:49.
 8 (The deposition concluded at 6:49 p.m.
 9 Israel Daylight Time.)

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1 of these reports in our records. I don't
 2 know.
 3 Q. Well, Stuart Page was your boss.
 4 And he paid you millions of dollars. And
 5 he said you and your team authored every
 6 one of these project updates about Project
 7 Beech.
 8 Is that accurate?
 9 A. Stuart Page told me, before
 10 he gave his affidavit, that he tried
 11 to commit suicide twice because they
 12 pressured him and forced him to cooperate.
 13 What I know is that we sent
 14 reports to Stuart Page, at his request
 15 the reports were left open, and that
 16 we did not investigate Farhad Azima.
 17 Q. (Not translated.) Earlier
 18 today you had some, I think, ten or
 19 eleven pages of notes. And we'd ask
 20 that that be marked as an exhibit since
 21 the witness had it in front of him.
 22 MR. BARET: He did not use it.
 23 It's privileged. It's notes we prepared
 24 just going over --
 25 MR. BEHRE: His notes were prepared

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1 CERTIFICATE OF REPORTER
 2
 3 I, BRENDA MATZOV, CSR NO. 9243, do
 4 hereby certify:
 5 That, prior to being examined, the
 6 witness named in the foregoing deposition was
 7 asked to acknowledge that their testimony will
 8 be true under the penalties of perjury and will
 9 be the truth, the whole truth, and nothing but
 10 the truth.
 11 That the foregoing deposition was taken
 12 before me, at which time the aforesaid proceedings
 13 were stenographically recorded by me and thereafter
 14 transcribed by me;
 15 That the foregoing transcript, as typed,
 16 is a true record of the said proceedings;
 17 And I further certify that I am not
 18 interested in the action.
 19
 20 Dated this 30th day of July, 2022.
 21
 22 _____
 23 BRENDA MATZOV, CSR NO. 9243

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CERTIFICATE OF WITNESS

1
2
3 I, AMIT FORLIT, witness herein, do
4 hereby certify and declare the within and
5 foregoing transcription to be my examination
6 under oath in said action taken on July 20,
7 2022, with the exception of the changes
8 listed on the errata sheet, if any;
9 That I have read, corrected, and
10 do hereby affix my signature under penalty
11 of perjury to said examination under oath.

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_____ AMIT FORLIT, Witness _____ Date _____

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ERRATA SHEET

1
2 Case: FARHAD AZIMA vs. INSIGHT ANALYSIS AND
3 RESEARCH LLC AND SDC-GADOT LLC
4 Date: JULY 20, 2022
5 Witness: AMIT FORLIT
6
7 Page ____ Line ____ Change _____
8 Reason _____
9 Page ____ Line ____ Change _____
10 Reason _____
11 Page ____ Line ____ Change _____
12 Reason _____
13 Page ____ Line ____ Change _____
14 Reason _____
15 Page ____ Line ____ Change _____
16 Reason _____
17 Page ____ Line ____ Change _____
18 Reason _____
19 Page ____ Line ____ Change _____
20 Reason _____
21 Page ____ Line ____ Change _____
22 Reason _____

23
24 _____ AMIT FORLIT, Witness _____ Date _____
25

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