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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)
)
v.) CRIMINAL ACTION
) NO. 00-0284 (MJJ)
PAVEL IVANOVICH LAZARENKO,)
)
Defendant.)

DEPOSITION UPON ORAL EXAMINATION
OF ANDREAS PETROU
TAKEN ON BEHALF OF THE GOVERNMENT

Nicosia, Cyprus
December 11, 2003

Before:
HONORABLE MICHAEL AMBIZAS
Judge of the District Court of Nicosia

1
2 Appearances:

3 UNITED STATES ATTORNEY'S OFFICE
4 By: MARTHA BOERSCH, ESQUIRE
5 JONATHAN HOWDEN, ESQUIRE
6 Assistant United States Attorneys
7 450 Golden Gate Avenue
8 San Francisco, CA 94102
9 Counsel for the United States

10 DANIEL A. HOROWITZ, ESQUIRE
11 120 Eleventh Street
12 Oakland, Ca. 94607
13 Counsel for the Defendant

14 SCORDIS, PAPAPETROU & CO.
15 By: ATHOS DEMETRIOU, ESQUIRE
16 By: MAKIS CHRISOMILAS, ESQUIRE
17 30 Karpenisiou Street
18 1660 Nicosia, Cyprus
19 Counsel for the Witness
20

21 ALSO PRESENT:

22 Pavel Ivanovich Lazarenko,
23 Defendant (Telephonically)

24 Oksana Teykova
25 (Telephonically)

Brian Earl, FBI Agent

Anna Savelyev, Court Interpreter
(Telephonically)

Lana Shirinova, Court Interpreter
(Telephonically)

Georgia (Loulla) O'Keefe,
Deposition Interpreter

Koulla Perdikoy, Nicosia
Court Reporter

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ANDREAS PETROU By Ms. Boersch By Mr. Horowitz 28	7

EXHIBITS

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6003	Nicosia Police Testimony of Andreas Petrou, dated 7/21/98	32
6004	Resolution of the Bank of Cyprus	49
6005	Deposition by Andreas Petrou, Municipality of Aglantzia	61

1 ANDREAS PETROU 13:06:02
2 evidence from Mr. Andreas Petrou, Mayor of Aglantzia. 13:06:20
3 Mayor of Aglantzia. Mayor of Aglantzia. 13:06:34
4 THE INTERPRETER (SAN FRANCISCO): Mayor? 13:06:43
5 THE COURT: Mayor. 13:06:43
6 According to the conditions of the request, 13:07:18
7 which -- which exists in the present case, and the 13:07:21
8 provisions of the relevant law of the Republic of 13:07:30
9 Cyprus, I shall proceed with the proceedings in 13:07:36
10 accordance with the application, having given 13:08:02
11 permission for the existence of microphone 13:08:28
12 communication, audio, audio communication, with the 13:08:33
13 accused, who I understand is listening to the 13:09:15
14 procedure. 13:09:19
15 On the -- upon the commencement of the 13:09:54
16 proceedings, the interpreter took the oath regarding a 13:09:59
17 true translation from Greek to English and vice versa 13:10:07
18 regarding what will be stated in court today. The 13:10:18
19 Court having ascertained that the interpreter has a 13:10:39
20 good knowledge of the Greek language as well as the 13:10:43
21 English language. 13:10:47
22 In order to proceed we will have -- we must 13:11:39
23 have the appearances of the -- of those who will 13:11:45
24 conduct the proceedings as per the application on 13:11:51
25 behalf of the prosecution of the United States of 13:11:57

1 ANDREAS PETROU 13:11:57
2 America, as well as on the part of the accused. 13:12:02
3 And I would ask both sides to give their 13:12:07
4 names for the purposes of the record. 13:12:10
5 MS. BOERSCH: Thank you. Martha Boersch, 13:12:16
6 Assistant United States Attorney for the United States 13:12:18
7 of America. 13:12:22
8 THE INTERPRETER: Martha Boersch, Assistant 13:12:22
9 State Attorney for U.S.A. 13:12:23
10 MR. HOROWITZ: Good afternoon, Your Honor. 13:12:23
11 Daniel Horowitz representing Pavel Ivanovich 13:12:54
12 Lazarenko. 13:12:58
13 THE INTERPRETER: Pavel Ivanovich? 13:13:12
14 MR. HOROWITZ: Lazarenko. 13:13:16
15 THE INTERPRETER: Lazarenko 13:13:16
16 MR. CHRISOMILAS: Chrisomilas, Makis. 13:13:48
17 MR. DEMETRIOU: Athos Demetriou. 13:13:48
18 THE INTERPRETER: The witness, Mr. Andreas 13:13:48
19 Petrou, is present. And Mr. Chrisomilas and 13:13:50
20 Mr. Demetriou are appearing on his behalf. 13:13:58
21 THE COURT: I will call Mr. Petrou to take 13:14:21
22 the oath as a witness. 13:14:24
23 THE WITNESS: I swear by Almighty God that 13:15:04
24 the evidence I shall give shall be the truth, the 13:15:08
25 whole truth, and nothing but the truth. 13:15:18

1 ANDREAS PETROU - DIRECT 13:15:18
2 ANDREAS PETROU was sworn and deposed on 13:15:18
3 behalf of the United States, as follows: 13:15:32
4 THE COURT: What is your name, please? 13:15:32
5 THE WITNESS: My name is Andreas Petrou. 13:15:34
6 THE COURT: The court addresses you now for 13:15:50
7 the examination in chief. 13:15:52
8 MS. BOERSCH: Thank you. 13:15:55
9 13:15:56
10 DIRECT EXAMINATION 13:15:56
11 BY MS. BOERSCH: 13:15:57
12 Q. Good afternoon, Mr. Petrou. 13:15:57
13 Mr. Petrou, what is your current 13:16:10
14 occupation? 13:16:12
15 A. I am the mayor of the town Aglantzia of 13:16:37
16 Cyprus. 13:16:37
17 Q. And how long have you been the mayor of 13:16:38
18 Aglantzia? 13:16:38
19 A. This is the 4th period of 5 years, so in 13:16:54
20 all it is 17 years until now. 13:17:02
21 MS. BOERSCH: I think she asked if you 13:17:18
22 could repeat your last sentence. 13:17:19
23 THE INTERPRETER: This is the -- 13:17:23
24 MS. BOERSCH: And my apologies. 13:17:35
25 Occasionally this happens that we lose the connection 13:17:36

1 ANDREAS PETROU - DIRECT 13:17:36
2 with the San Francisco phone. So if we could just 13:17:40
3 wait until they call back. 13:17:45
4 THE COURT: We have to wait. 13:17:47
5 MS. BOERSCH: Can you hear us okay there? 13:17:55
6 THE INTERPRETER: (SAN FRANCISCO): Excuse 13:17:58
7 me. We got disconnected, and before we got 13:17:59
8 disconnected, I ask that you repeat the very last 13:18:01
9 sentence that you translated before that the witness 13:18:04
10 said. 13:18:08
11 THE INTERPRETER: So this is the 4th 5- 13:18:10
12 year period. So in all, 17 years until now. 13:18:14
13 THE INTERPRETER (SAN FRANCISCO): Thank you. 13:18:14
14 BY MS. BOERSCH: 13:18:31
15 Q. Mr. Petrou, have you ever been acquainted 13:18:31
16 with a woman by the name of Yulia Tymoshenko? 13:18:34
17 Yulia Tymoshenko. 13:18:42
18 A. Yes. The first and only time I saw her in 13:19:09
19 1992. 13:19:21
20 Q. And where did you meet her in 1992? 13:19:24
21 A. During this period, my wife had a travel 13:19:45
22 office. 13:19:50
23 Late in the afternoon of one day, three 13:20:14
24 foreign people, I think, arrived in her office who 13:20:25
25 were asking for information about a certain attorney. 13:20:43

1 ANDREAS PETROU - DIRECT 13:20:43
2 Mrs. Tymoshenko was with them. 13:21:10
3 Q. And do you recall who the other -- the 13:21:19
4 names of the other two individuals who were with 13:21:21
5 Mrs. Tymoshenko? 13:21:26
6 A. No. Many years have elapsed. 13:21:56
7 No. 13:22:05
8 MS. BOERSCH: What phone are they using 13:22:10
9 back there, Dan? THE normal phone? 13:22:12
10 MR. HOROWITZ: Yes. Direct land phone. 13:22:15
11 THE INTERPRETER (SAN FRANCISCO): We want 13:23:12
12 you to certify. Is there -- do you know what could be 13:23:13
13 the reason? 13:23:18
14 MR. HOROWITZ: Yes. They complain about 13:23:19
15 that poor U.S. phone service, but we apologized 13:23:20
16 already for it. 13:23:24
17 MS. BOERSCH: Where did we lose you? 13:23:29
18 MR. HOROWITZ: They didn't lose anything. 13:23:39
19 THE INTERPRETER: I think they were just 13:23:42
20 waiting for us. 13:23:44
21 So the answer is no. Many years have 13:23:45
22 elapsed. That was the first time I saw them. And I 13:23:47
23 don't remember them. And 12 years have elapsed. 13:23:57
24 Q. Do you recall whether you ever met a person 13:24:06
25 by the name of Olexandr Tymoshenko? 13:24:08

1 ANDREAS PETROU - DIRECT 13:24:08
2 A. If he had white hair. Yes. He was someone 13:24:37
3 with white hair. 13:24:44
4 Q. And do you recall whether you ever met a 13:24:50
5 person by the name of Oleksandr Gravets? 13:24:52
6 A. No. I don't remember him. 13:25:12
7 Q. When you mentioned that Ms. Tymoshenko came 13:25:18
8 to your wife's travel agency, were you present when 13:25:21
9 she first came to your wife's travel agency? 13:25:24
10 THE INTERPRETER: Did you say Mr. and Mrs. 13:26:01
11 Tymoshenko? 13:26:01
12 MS. BOERSCH: Mrs. 13:26:01
13 A. Yes. I happened to be present at that 13:26:07
14 time. 13:26:11
15 BY MS. BOERSCH: 13:26:14
16 Q. And what happened after Mrs. Tymoshenko and 13:26:15
17 the two other individuals indicated they were looking 13:26:18
18 for a lawyer? 13:26:21
19 A. We told them we did not know such a lawyer. 13:27:14
20 We offered them a drink, from what I remember. 13:27:24
21 MS. BOERSCH: We don't always hear the 13:27:39
22 translation. I think they will stop if they don't 13:27:40
23 hear you. 13:27:42
24 THE INTERPRETER: They have stopped. I 13:27:44
25 have translated. I don't get a feedback. 13:27:46

1 ANDREAS PETROU - DIRECT 13:27:46
2 A. We offered them a drink, from what I 13:27:49
3 remember, and we told them -- then break -- they told 13:27:51
4 us they wanted to form a company in Cyprus. And we 13:28:04
5 told them if they do not find the person they are 13:28:12
6 looking for we can help them. 13:28:18
7 BY MS. BOERSCH: 13:28:26
8 Q. And when you say they told us, was -- do 13:28:26
9 you mean Mrs. Tymoshenko, or do you mean one of the 13:28:34
10 other two individuals who was with her? 13:28:37
11 A. I don't remember which one from all of 13:29:05
12 them, or if it was all together that they said it. 13:29:09
13 Q. And do you speak either Russian or 13:29:20
14 Ukrainian? 13:29:23
15 A. I neither speak nor write either Russian or 13:29:47
16 Ukrainian. 13:29:53
17 Q. And so when you spoke with Ms. Tymoshenko 13:29:56
18 and the other two individuals, what language did you 13:30:00
19 speak in? 13:30:03
20 A. I think in English. English. 13:30:20
21 Q. When they indicated that they wanted to 13:30:26
22 form a company, did they indicate for what purpose 13:30:28
23 they wanted to create a company? 13:30:31
24 MR. HOROWITZ: Objection. Vague. As it 13:30:37
25 calls for "they" with a very specific question posed. 13:30:40

1 ANDREAS PETROU - DIRECT 13:30:40
2 THE INTERPRETER: We'll translate the 13:30:56
3 question first. 13:30:57
4 MS. BOERSCH: We have in other places had 13:30:58
5 an agreement that there is no need to translate the 13:30:59
6 objections since they are just for our record, and 13:31:02
7 that makes the proceedings go a little bit faster. 13:31:05
8 THE COURT: (Discussion in Greek) 13:32:27
9 THE INTERPRETER: You said they. Could 13:32:43
10 you repeat your question. You said they, with a very 13:32:45
11 specific question posed. They. 13:32:48
12 MR. HOROWITZ: I can't rephrase it 13:32:52
13 verbatim. I can only say that -- the objection was 13:32:55
14 vague as it referred to they, when the question was 13:33:02
15 very specific calling for what one individual person 13:33:06
16 may have said or done. 13:33:10
17 THE INTERPRETER: And the Court said, no. 13:34:20
18 The objections will be translated so that there will 13:34:22
19 be a complete record here. Because this record is 13:34:26
20 what will be sent through the appropriate authority to 13:34:34
21 the appropriate authority of the United States of 13:34:40
22 America, and it will include exactly what was said 13:34:43
23 here today. 13:34:56
24 I do understand the spirit of the 13:35:04
25 suggestion, but I do consider it is more correct for a 13:35:07

1 ANDREAS PETROU - DIRECT 13:35:07
2 translation -- for a translation to be made so that it 13:35:16
3 will be part of the record of the present proceedings 13:35:24
4 what is said today in court. 13:35:29
5 THE COURT: As regards the objection which 13:36:01
6 was raised, of course it has been recorded, the 13:36:03
7 question. It will remain the same and I will call 13:36:07
8 upon the witness to reply. 13:36:13
9 Do you remember -- 13:36:40
10 THE INTERPRETER: The court to the witness: 13:36:41
11 Do you remember the question, or do you want it to be 13:36:43
12 read out? 13:36:45
13 THE WITNESS: I remember it. Is it, if 13:36:48
14 they came for what purpose? 13:36:51
15 THE COURT: Please read the last question 13:37:00
16 which was put to the witness. 13:37:01
17 THE INTERPRETER: When they indicated that 13:37:21
18 they wanted to form a company, did they indicate for 13:37:22
19 what purpose they wanted to create a company? 13:37:24
20 A. So 12 years have elapsed since then and it 13:37:54
21 is impossible for me to remember from one momentary 13:38:01
22 meeting unexpected what details were stated. 13:38:09
23 BY MS. BOERSCH: 13:38:23
24 Q. What did you do after they told you that 13:38:24
25 they wanted to form a company and were looking for a 13:38:26

1 ANDREAS PETROU - DIRECT 13:38:26
2 lawyer? 13:38:30
3 MR. HOROWITZ: Vague. 13:38:45
4 THE COURT: Answer. 13:39:01
5 A. After we had this conversation, they left 13:39:31
6 my wife's office and they undertook if they did not 13:39:36
7 find the man, the lawyer they were looking for, to 13:39:44
8 communicate with us. 13:39:47
9 Q. And did they communicate with you again 13:40:03
10 after they left? 13:40:05
11 A. Yes. They communicated, I think, one or 13:40:28
12 two days later. 13:40:31
13 Q. And what happened then? 13:40:38
14 A. We showed them the law office Skordis and 13:40:54
15 Papapetrou. 13:41:00
16 Correction. We indicated to them the law 13:41:04
17 office of Skordis and Papapetrou, and they 13:41:06
18 communicated with the office to make their 13:41:28
19 arrangements. 13:41:31
20 MR. HOROWITZ: Motion to strike. 13:41:39
21 Nonresponsive. Meaning take out. To take out part of 13:41:45
22 his answer. 13:41:52
23 MS. BOERSCH: Did we get an answer? 13:42:13
24 Yes. We got an answer. 13:42:15
25 MR. HOROWITZ: Yes. 13:42:17

1 ANDREAS PETROU - DIRECT 13:42:17
2 BY MS. BOERSCH: 13:42:18
3 Q. Do you know whether or not a company was 13:42:18
4 registered? 13:42:20
5 A. Yes. Because I think the second -- I don't 13:42:48
6 remember what day -- the office of Papapetrou called 13:42:55
7 me to a meeting with them. 13:43:04
8 Q. And what happened at that meeting? 13:43:14
9 A. There it was stated that in order to form a 13:43:40
10 company, they must have a Cypriot director. And 13:43:44
11 because, from what they said, they didn't know anyone 13:44:16
12 in Cyprus, Mr. Papapetrou asked me to go in even 13:44:21
13 temporarily as a director. 13:44:34
14 Q. And did you agree to serve as a director? 13:44:43
15 A. Yes. Since it was temporarily, I agreed. 13:45:03
16 Q. Do you remember the name of the company for 13:45:12
17 which you would be a temporary director? 13:45:16
18 A. No. I don't remember it. 13:45:29
19 Q. Do you recall the name Somolli Enterprises? 13:45:34
20 A. Yes. I remember it. As I said, yes, I 13:45:51
21 remember it from the fact that in 2002, in April -- 13:46:15
22 Your Honor, if I could consult my notes regarding the 13:46:21
23 date -- they notified me from the office of the 13:46:26
24 Minister of Public Order to go -- to go to America to 13:46:56
25 testify regarding this company for which I was 13:47:12

1 ANDREAS PETROU - DIRECT 13:47:12
2 director. 13:47:24
3 Q. And what happened after you were -- you 13:47:37
4 received that notification? 13:47:40
5 A. By telephone and in writing I notified I 13:47:56
6 couldn't go to America. 13:48:04
7 Q. Now, after you agreed to serve as a 13:48:11
8 temporary director of this company, did you have any 13:48:15
9 further contact with Ms. Tymoshenko about the company 13:48:19
10 or your role as a director? 13:48:26
11 THE INTERPRETER: With Mrs. Tymoshenko? 13:48:30
12 MS. BOERSCH: About the company, or your 13:48:33
13 role as a director? 13:48:34
14 A. No. I had no contact at all since then. 13:49:15
15 Since that time until today. 13:49:23
16 Q. Did you acquire any financial interest in 13:49:32
17 the company for which you were a temporary director? 13:49:35
18 A. No. Absolutely nothing. 13:50:02
19 Q. And after you agreed to be a temporary 13:50:06
20 director, did you conduct any of the business 13:50:09
21 activities of the company? 13:50:11
22 A. No. Absolutely nothing. 13:50:50
23 Q. And was Somolli Enterprises in fact the 13:50:55
24 company for which you agreed to serve as a temporary 13:50:58
25 director? 13:51:02

1 ANDREAS PETROU - DIRECT 13:51:02
2 A. From the notification of the Ministry of 13:52:03
3 Public Order, it seems, yes, it was. 13:52:06
4 Q. After you agreed to be a temporary 13:52:21
5 director, did you ever sign any documents for the 13:52:23
6 company? 13:52:27
7 A. No. Absolutely none. No. Absolutely 13:52:50
8 none, apart from the final account in 1997 when the 13:53:09
9 office of Mr. Papapetrou notified me. 13:53:27
10 Q. And the final accounting that you signed, 13:53:38
11 did you have any personal knowledge of any of the 13:53:40
12 underlying business activity reflected in that audit. 13:53:42
13 THE INTERPRETER: For any of the 13:54:27
14 underlying business activity affecting them. 13:54:27
15 In any of -- any of the underlying business 13:54:51
16 activity reflected in that underlying? 13:54:54
17 THE COURT: Can you repeat your question so 13:55:26
18 that we are sure we have it right? 13:55:28
19 MS. BOERSCH: Yes. 13:55:31
20 BY MS. BOERSCH: 13:55:32
21 Q. When you signed the final audit, did you at 13:55:33
22 that time have any personal knowledge of the 13:55:39
23 underlying business activity reflected in that final 13:55:42
24 audit? 13:55:47
25 MR. HOROWITZ: Objection. Vague. 13:56:22

1 ANDREAS PETROU - DIRECT 13:56:22
2 THE COURT: Reply. 13:56:31
3 A. No. I had no knowledge. From what was 13:56:45
4 explained to me, it was a formal signature of 13:56:48
5 accounts. 13:56:54
6 BY MS. BOERSCH: 13:56:54
7 Q. Did you ever discuss the substance of those 13:57:01
8 accounts with anyone other than Mr. Papapetrou? 13:57:04
9 MR. HOROWITZ: Objection. Assumes facts 13:57:27
10 not in evidence. 13:57:29
11 (The question was read by the reporter.) 13:58:05
12 A. No. Neither did I discuss it with 13:58:36
13 Mr. Papapetrou, but that signature of the final 13:58:48
14 accounts reminded me that I was the director of 13:58:49
15 Somolli temporarily, and it is from there I asked 13:58:55
16 immediately to resign as director. 13:59:05
17 BY MS. BOERSCH: 13:59:18
18 Q. And that was in 1997, as you recall? 13:59:18
19 A. Yes. In January 1997. 13:59:32
20 MS. BOERSCH: Your Honor, I would like to 13:59:40
21 show the witness a document that the United States 13:59:41
22 would ask to be marked. It's been previously produced 13:59:46
23 as government exhibit 802. 13:59:50
24 THE INTERPRETER: Government. 14:00:08
25 MS. BOERSCH: Exhibit 802. 14:00:10

1 ANDREAS PETROU - DIRECT 14:00:10
2 And I can show it first to Mr. Horowitz. 14:00:13
3 If you would, Bryan, and to Mr. Petrou's lawyers as 14:00:16
4 well. 14:00:20
5 BY MS. BOERSCH: 14:01:05
6 Q. And my question for the witness will be 14:01:05
7 whether or not he's ever seen that document before. 14:01:08
8 A. No. Never. 14:01:28
9 Q. And if you could, before you hand it back, 14:01:29
10 look at the last page, and there's a signature there. 14:01:31
11 I believe it's on the right-hand side. I believe it's 14:01:47
12 on the right-hand side. There's actually two 14:01:51
13 signatures. 14:01:54
14 Is that your signature? 14:01:57
15 A. No. It's not. 14:02:01
16 Q. Do you recall ever signing any such 14:02:06
17 documents on behalf of Somolli Enterprises? 14:02:10
18 MR. HOROWITZ: Vague. And overbroad. 14:02:31
19 Overbroad. 14:02:40
20 A. No. I neither saw nor signed any document 14:02:58
21 of Somolli. 14:03:03
22 BY MS. BOERSCH: 14:03:10
23 Q. Do you recall whether you were familiar 14:03:10
24 with a company by the name of United Energy Systems of 14:03:13
25 Ukraine? 14:03:18

1 ANDREAS PETROU - DIRECT 14:03:18
2 THE COURT: United Energy? 14:03:28
3 THE INTERPRETER: Energy Systems Ukraine. 14:03:30
4 United Energy Systems Ukraine. 14:03:52
5 A. You are asking me in vain. 14:04:31
6 MS. BOERSCH: We lost the connection. 14:04:35
7 MR. CHRISOMILAS: In vain or disdain? 14:04:46
8 MS. BOERSCH: Yes. All of the above. 14:04:49
9 (Discussion off the record) 14:04:49
10 THE INTERPRETER (SAN FRANCISCO): We got 14:05:52
11 disconnected. 14:05:56
12 THE INTERPRETER: So I will repeat the 14:05:58
13 answer. 14:06:00
14 THE INTERPRETER (SAN FRANCISCO): Thank 14:06:03
15 you. 14:06:03
16 THE INTERPRETER: You are asking me in 14:06:06
17 vain, because I categorically state I never saw nor 14:06:08
18 signed any document of Somolli or of any company. 14:06:15
19 BY MS. BOERSCH: 14:06:26
20 Q. When you agreed to become a temporary 14:06:27
21 director, did you sign any documents at that time to 14:06:29
22 become a temporary director? 14:06:33
23 A. I think, yes. 14:07:00
24 Q. And what sort of document would that have 14:07:04
25 been, if you recall? 14:07:06

1 ANDREAS PETROU - DIRECT 14:07:06
2 A. I don't remember. 14:07:15
3 Q. Were you familiar with a company by the 14:07:23
4 name of United Energy International Limited? 14:07:24
5 THE INTERPRETER: United Energy 14:07:41
6 International Limited. 14:07:45
7 A. No. 14:07:46
8 BY MS. BOERSCH: 14:07:46
9 Q. Were you ever in London -- were you ever in 14:07:47
10 London to negotiate any agreements between Somolli and 14:07:54
11 United Energy International? 14:07:59
12 A. No. 14:08:25
13 Q. Did you ever meet an individual by the name 14:08:26
14 of Serif Ercument Aksoy? 14:08:29
15 A. No. 14:08:54
16 Q. Have you ever met an individual by the name 14:08:55
17 of Doncho Stojanovsky. 14:08:57
18 A. No. 14:09:12
19 Q. Okay. And now, I apologize for this, but I 14:09:14
20 need to go through some documents. 14:09:20
21 THE INTERPRETER (SAN FRANCISCO): Pardon 14:09:24
22 me. 14:09:25
23 THE INTERPRETER: No. No. 14:09:30
24 BY MS. BOERSCH: 14:09:30
25 Q. I'm going to show you a series of documents 14:09:42

1 ANDREAS PETROU - DIRECT 14:09:42
2 and just -- I just want to know whether or not it's 14:09:45
3 your signature on the last page. And we'll begin with 14:09:48
4 a document that's been marked as government's exhibit 14:10:09
5 803. 14:10:12
6 A. No. No. No. 14:10:41
7 Q. And this document -- and I'd asked, when 14:10:47
8 you look at this document which is marked as 14:10:50
9 government's exhibit 804, if you could look at the 14:10:53
10 signature in the bottom left-hand corner of each page 14:10:57
11 and tell me whether or not that signature is yours. 14:11:05
12 A. No. It's not my signature. 14:12:08
13 Q. And the next document is a letter, and it's 14:12:12
14 marked as government's exhibit 814. 14:12:15
15 A. No. It's not my signature. 14:12:52
16 Q. And the next document has been marked as 14:12:58
17 government's exhibit 874. 874. And ask if any of the 14:13:01
18 signatures on that document are yours? 14:13:17
19 THE INTERPRETER (SAN FRANCISCO): Hello. 14:13:55
20 MS. BOERSCH: Hello. Yes, we're here. 14:13:58
21 A. No. It's not my signature. 14:14:09
22 Q. The next document is marked as government's 14:14:12
23 exhibit 875. 14:14:14
24 MR. HOROWITZ: You think he might say yes? 14:14:39
25 MS. BOERSCH: You might argue yes. 14:14:42

1 ANDREAS PETROU - DIRECT 14:14:42
2 THE INTERPRETER: (SAN FRANCISCO): Are we 14:15:22
3 still connected? 14:15:22
4 MR. HOROWITZ: If we get disconnected, 14:15:25
5 we'll tell you. 14:15:27
6 A. No, it's not my signature. 14:15:31
7 BY MS. BOERSCH: 14:15:36
8 Q. Are you acquainted with an entity here in 14:15:36
9 Cyprus called the Team Pool Estates Limited? 14:15:40
10 THE INTERPRETER: Repeat, please. 14:15:46
11 BY MS. BOERSCH: 14:15:46
12 Q. The Team Pool, T-e-a-m P-o-o-l Estates 14:15:49
13 Limited. 14:15:55
14 THE INTERPRETER: Team Pool Estates 14:16:11
15 Limited. 14:16:13
16 A. Yes. It is a company in which my wife is a 14:16:20
17 shareholder. 14:16:25
18 MS. BOERSCH: I'm sorry. I missed the 14:16:44
19 answer. 14:16:55
20 THE INTERPRETER: Yes, it is a company in 14:16:55
21 which my wife is a shareholder. 14:16:55
22 BY MS. BOERSCH: 14:16:55
23 Q. And what about an entity called Panema, 14:16:55
24 P-a-n-e-m-a Tours Limited? 14:17:01
25 A. Yes. It was a company in which my wife was 14:17:15

1 ANDREAS PETROU - DIRECT 14:17:15
2 a shareholder. 14:17:19
3 Q. Do you know whether or not the Team Pool 14:17:27
4 Estates Limited had any financial interest in the 14:17:29
5 company Somolli Enterprises? 14:17:33
6 A. Definitely not. 14:17:55
7 Q. Do you know whether or not the entity 14:18:00
8 Panema Tours Limited ever had owned any shares of 14:18:02
9 Somolli Enterprises? 14:18:06
10 THE INTERPRETER: Ever owned any shares? 14:18:09
11 MS. BOERSCH: Any shares. 14:18:12
12 THE INTERPRETER: Of? 14:18:13
13 MS. BOERSCH: Somolli. 14:18:15
14 A. Definitely no. 14:18:38
15 BY MS. BOERSCH: 14:18:48
16 Q. Did you ever have any -- well, did you ever 14:18:48
17 open any bank accounts in Cyprus on behalf of Somolli? 14:18:57
18 A. I don't remember. Then when I was 14:19:57
19 appointed as director, if I signed something about a 14:19:59
20 bank account, but my signature must appear. 14:20:15
21 Q. Let me show you what we have marked, or 14:20:32
22 will mark, as government exhibit 1805. 1085. And ask 14:20:37
23 if you could look through that document and tell me 14:20:48
24 whether or not you have seen it before and whether or 14:20:51
25 not your signature appears on that document anywhere? 14:20:53

1 ANDREAS PETROU - DIRECT 14:20:53
2 MS. BOERSCH: Let me see yours, Dan. 14:21:13
3 MR. HOROWITZ: I only have one document. 14:21:15
4 THE INTERPRETER: You said what will be 14:21:23
5 marked, or what has been marked? 14:21:24
6 MS. BOERSCH: Well, I believe it has been 14:21:26
7 marked. 14:21:27
8 MR. EARL: Well, it's set to be marked. 14:21:30
9 MS. BOERSCH: Well, then we will mark it. 14:21:33
10 That's what I need to know. Has it already been 14:21:34
11 marked or not? All right. We will mark it as 1085. 14:21:37
12 THE INTERPRETER (SAN FRANCISCO): Are you 14:23:31
13 still there? 14:23:31
14 THE INTERPRETER: Yes. 14:23:33
15 A. I don't remember having seen it, but on, I 14:23:51
16 think page 19, it is my signature in English. 14:23:55
17 BY MS. BOERSCH: 14:24:05
18 Q. And you don't -- do you have any current 14:24:05
19 recollection of whether or not you signed that. 14:24:09
20 MS. BOERSCH: I'm sorry, what? 14:24:14
21 (Discussion in Greek) 14:24:16
22 THE INTERPRETER (SAN FRANCISCO): Would you 14:24:19
23 repeat. 14:24:21
24 MS. BOERSCH: Yes. It's government exhibit 14:24:23
25 1085, and I'll give you the Bates numbers. It's 14:24:25

1 ANDREAS PETROU - DIRECT 14:24:25
2 H000013 through H000022. 14:24:29
3 THE INTERPRETER (SAN FRANCISCO): Thank 14:24:41
4 you. And 2. 14:24:41
5 MS. BOERSCH: Right. And the page he's 14:24:45
6 referring to is the page that's Bates stamped H000019. 14:24:46
7 THE INTERPRETER: You did put a question. 14:25:01
8 If I'm right, do you have any clear recollection if 14:25:02
9 you signed that. 14:25:05
10 Is that your question? 14:25:06
11 MS. BOERSCH: Does he have any current 14:25:08
12 recollection of signing that. 14:25:09
13 THE INTERPRETER: Oh. Do you have any 14:25:12
14 current recollection of having signed it. 14:25:13
15 A. How can I remember 12 years ago? But it is 14:25:39
16 my signature on page 19. 14:25:44
17 BY MS. BOERSCH: 14:25:47
18 Q. And did you ever have any responsibility 14:25:47
19 for conducting any financial transactions, or 14:25:50
20 specifically banking transactions on behalf of 14:25:56
21 Somolli? 14:25:58
22 A. No. Definitely none. 14:26:41
23 Q. Have you ever heard of a company called 14:26:45
24 Orphin, O-r-p-h-i-n? 14:26:47
25 A. No. 14:27:01

1 ANDREAS PETROU - DIRECT 14:27:01
2 Q. After your initial meeting with 14:27:04
3 Ms. Tymoshenko, have you had any communications with 14:27:06
4 her, or anyone else related to that company, Somolli, 14:27:10
5 either by telephone -- well, by telephone. 14:27:19
6 A. No. No, I don't remember having any 14:27:57
7 communication. 14:28:07
8 Q. Have you ever met Mr. Lazarenko, Pavel 14:28:14
9 Ivanovich Lazarenko? 14:28:18
10 A. I didn't meet, nor do I know any Lazarenko. 14:28:37
11 MS. BOERSCH: I think I have no further 14:28:50
12 questions at this time. 14:28:52
13 THE INTERPRETER: The court is asking if 14:29:55
14 there is still a long procedure left, it would be more 14:29:56
15 appropriate to adjourn for a while now to give an 14:30:00
16 opportunity to the stenographers to have a rest and 14:30:04
17 then to continue. But if there is not much left 14:30:07
18 regarding the testimony of the witness, and if he is 14:30:11
19 in a position to continue now, we can complete. But 14:30:14
20 it depends on what is left. 14:30:17
21 What is left? And I am asking for your 14:30:21
22 views. 14:30:25
23 MR. HOROWITZ: I would respectfully request 14:30:27
24 that we do take a break because I do have much to do. 14:30:29
25 THE COURT: We will adjourn now. It is 14:31:05

1 ANDREAS PETROU - CROSS 14:31:05
2 2:30 p.m., and we will resume at 3:30 to continue. 14:31:06
3 The witness to be here at 3:30. 14:31:11
4 MS. BOERSCH: Thank you. 14:31:14
5 14:31:14
6 (A luncheon recess was taken from 2:31 to 14:31:46
7 2:40 p.m.) 14:31:46
8 14:31:46
9 THE COURT: After the adjournment, the 15:43:54
10 appearances are as before, and the interpreter is 15:43:56
11 reminded of her oath. 15:43:59
12 Mr. Petrou, the witness, is also reminded 15:44:20
13 that he's still on oath. 15:44:24
14 MR. HOROWITZ: Thank you. 15:44:32
15 15:44:32
16 CROSS-EXAMINATION 15:44:32
17 MR. HOROWITZ: 15:44:33
18 Q. Good afternoon, Mr. Petrou. Mayor Petrou. 15:44:33
19 THE INTERPRETER: Hello? 15:44:51
20 MS. BOERSCH: Hello. Yes. 15:44:52
21 MR. HOROWITZ: Are we ready? 15:44:55
22 BY MR. HOROWITZ: 15:45:03
23 Q. Sir, when these three people came to your 15:45:03
24 wife's business, what name was on the business? 15:45:03
25 A. Panema Tours Limited. 15:45:31

1 ANDREAS PETROU - CROSS 15:45:31
2 Q. And did it also have your name on it? 15:45:32
3 A. No. No. 15:45:39
4 Q. Did it have your wife's name on it? 15:45:41
5 A. Where on it? 15:45:50
6 Q. Anywhere where a person on the street could
7 see? 15:45:57
8 A. No. 15:46:03
9 Q. Was that business listed in any telephone
10 directory as being your address, your personal 15:46:12
11 address, Mr. Andreas Petrou? 15:46:15
12 A. No. 15:46:35
13 Q. At that time you were mayor; is that right? 15:46:37
14 A. Yes. 15:46:44
15 Q. And did you -- 15:46:45
16 THE INTERPRETER (SAN FRANCISCO): What was 15:46:49
17 the question, Mr. Horowitz? 15:46:51
18 MR. HOROWITZ: Was he mayor at that time. 15:46:53
19 BY MR. HOROWITZ: 15:46:56
20 Q. And did you -- 15:46:57
21 THE INTERPRETER (SAN FRANCISCO): And what 15:46:59
22 was the answer? 15:47:00
23 THE INTERPRETER: Yes. 15:47:02
24 BY MR. HOROWITZ: 15:47:03
25 Q. And did you conduct your business as mayor 15:47:03

1 ANDREAS PETROU - CROSS 15:47:03
2 from your wife's travel business? 15:47:06
3 A. No. No. 15:47:28
4 Q. Did you conduct your business as mayor from 15:47:30
5 another address? 15:47:33
6 A. Yes. From the office of the municipality. 15:47:49
7 Q. Can you think of any directory, phone book, 15:47:58
8 listing, that ever said that Andreas Petrou was at the 15:48:05
9 address where your wife had her travel agency, at the 15:48:11
10 time that's in question here? 15:48:17
11 A. No. There was no such thing. 15:49:11
12 Q. And as far as you know, was there any other 15:49:15
13 Andreas Petrou in Nicosia at that time who was a 15:49:18
14 lawyer? 15:49:26
15 A. Neither did I know -- neither now do I know 15:49:54
16 if there is such a name. 15:49:58
17 Q. Are you presently involved in the customs 15:50:04
18 clearance and forwarding business as an agent? 15:50:07
19 A. No. I never had, or have a connection with 15:51:16
20 clearing. 15:51:22
21 Q. Are you familiar -- and are you familiar 15:51:24
22 with an Andreas Petrou who does do that business? 15:51:30
23 A. No. 15:51:45
24 Q. Okay. So when these three people walked 15:51:46
25 into your wife's business and asked for you by name, 15:51:52

1 ANDREAS PETROU - CROSS 15:51:52
2 didn't that seem very strange to you? 15:51:58
3 A. No, not at all because they were asking for 15:52:40
4 information, and as people we had to give it to them. 15:52:44
5 Q. But didn't you say that they came to that 15:52:54
6 business asking for a person named Nicosia Petrou who 15:52:59
7 was a lawyer? 15:53:05
8 A. No. I didn't say such a thing. I said 15:53:30
9 they were looking for a certain lawyer. 15:53:34
10 Q. By the name of what? 15:53:36
11 A. I don't remember such a thing. 15:53:43
12 Q. Do you recall being interviewed by the 15:53:51
13 Nicosia police department on the 21st day of July 1998 15:53:54
14 about this matter? 15:54:02
15 A. Yes. 15:54:25
16 Q. And isn't it true that you told the 15:54:26
17 investigating police officer that you accidentally met 15:54:29
18 some Ukrainians who were looking for an attorney named 15:54:36
19 Nicosia Petrou? 15:54:44
20 A. No. I don't remember. I don't think there 15:55:08
21 was such a thing. 15:55:16
22 Q. I have a document that is Bates stamped 15:55:21
23 S001644 and 1645 in the original handwritten Greek. 15:55:25
24 MS. BOERSCH: Bates is B-a-t-e-s. It's a 15:55:56
25 term of art, like Kleenix. Bates hyphen stamp. 15:55:59

1 ANDREAS PETROU - CROSS 15:55:59
2 MR. HOROWITZ: I also have the English 15:56:32
3 translation that I'm also going to supply. It's 15:56:34
4 marked -- it's marked D6003, all four pages. All 15:56:45
5 counsel have seen them, and I present them first to 15:57:11
6 the Court. 15:57:14
7 If you could please hand that to the 15:57:39
8 witness. 15:57:42
9 BY MR. HOROWITZ: 15:57:43
10 Q. Sir, if you would look at just the first 15:57:45
11 two pages. I don't expect you to look at the English. 15:57:46
12 Then I'll ask you a question. 15:57:50
13 (Protocol dated 21/7/1998, Bates 15:57:53
14 S001644 and 1645 was marked 15:57:53
15 Defendant's Exhibit No. 6003.) 15:58:22
16 BY MR. HOROWITZ: 15:58:22
17 Q. Sir, do you recognize the first two pages 15:58:22
18 of the document, that part that is in Greek? 15:58:24
19 A. Of course, because on the first page there 15:58:45
20 are my initials, and on the second my signature. 15:58:47
21 Q. And, sir, when was that statement made by 15:58:54
22 you? 15:58:59
23 A. This is the one you asked me about. It is 15:59:25
24 21/7/1998. That is -- that is what is written on it. 15:59:29
25 Q. And are the contents of that document true 15:59:42

1 ANDREAS PETROU - CROSS 15:59:42
2 and correct as they reflect what you said to the 15:59:44
3 police officer? 15:59:48
4 A. Of course. 16:00:15
5 Q. And did you tell the police the truth on 16:00:17
6 that day? 16:00:20
7 A. I must have done. From what I remember, I 16:00:33
8 must have said the truth. 16:00:36
9 Q. So then these people did come to your 16:00:41
10 wife's business and asked for an attorney by name, 16:00:45
11 Nicosia Petrou, right? 16:00:48
12 A. No. 16:01:13
13 Q. How, then, sir, can you explain that in 16:01:17
14 that document it says the very words that the people 16:01:20
15 came looking for a lawyer named Nicosia Petrou? 16:01:24
16 MS. BOERSCH: Objection. Hearsay. 16:01:30
17 Objection. Hearsay. 16:02:00
18 A. I don't remember this thing. 16:02:20
19 BY MR. HOROWITZ: 16:02:42
20 Q. You do read the words on that document that 16:02:42
21 says that people came in looking for Nicosia Petrou, 16:02:46
22 is that right? 16:02:50
23 MS. BOERSCH: Same objection. 16:02:51
24 A. Yes. It writes this thing here, but I'm 16:03:23
25 absolutely sure, certain they were not looking on that 16:03:28

1 ANDREAS PETROU - CROSS 16:03:28
2 day for the name Nicosia Petrou. 16:03:32
3 BY MR. HOROWITZ: 16:03:44
4 Q. Why, then, sir, did you put your initial on 16:03:44
5 the first page and sign the second page if the 16:03:47
6 information that you just referred to was not true and 16:03:51
7 accurate? 16:03:54
8 A. Probably it might have escaped me. It was 16:04:41
9 referring to Papapetrou, and probably it escaped me. 16:04:46
10 Q. Sir, you testified earlier today that Team 16:05:03
11 Pool Estates was a company in which your wife was a 16:05:06
12 shareholder. Do you recall that? 16:05:12
13 A. Of course. 16:05:30
14 Q. Isn't it true that Team Pool Estates is a 16:05:33
15 company in which your son was a shareholder? 16:05:37
16 A. Yes. Yes, of course. 16:05:52
17 Q. So your son and wife were both 16:05:55
18 shareholders? 16:05:57
19 A. Yes. 16:06:07
20 Q. Why did you tell the police in that 16:06:09
21 document at page 2 only that your son was a 16:06:12
22 shareholder? 16:06:16
23 MS. BOERSCH: Objection. Hearsay. 16:06:25
24 A. But I don't see such a thing being said. I 16:07:02
25 don't see it being said on page 2 that only my son is 16:07:07

1 ANDREAS PETROU - CROSS 16:07:07
2 a shareholder. 16:07:11
3 BY MR. HOROWITZ: 16:07:18
4 Q. Sir -- may I see the English? 16:07:18
5 What I'm referring to is one of the last 16:07:44
6 two sentences. At least in the English translation. 16:07:47
7 Your attorneys are looking now. 16:08:01
8 MR. CHRISOMILAS: It doesn't say it. It 16:08:11
9 doesn't say it. 16:08:16
10 A. The translation into English doesn't 16:08:30
11 interest me. I am interested in what the police 16:08:34
12 obtained from me, and it doesn't say such a thing. 16:08:38
13 The second page doesn't say such a thing. 16:08:45
14 BY MR. HOROWITZ: 16:08:56
15 Q. So you're saying that the second page says 16:08:56
16 that both your son and wife are shareholders in Team 16:08:58
17 Pool Estates? 16:09:04
18 A. Yes. 16:09:18
19 Q. Okay. And your son and wife are also 16:09:19
20 shareholders in Panema? 16:09:24
21 A. No. 16:09:31
22 THE INTERPRETER (SAN FRANCISCO): Mr. 16:09:31
23 Horowitz, could you please read your question into the 16:09:35
24 microphone? 16:09:37
25 THE INTERPRETER: What did she say? 16:09:38

1 ANDREAS PETROU - CROSS 16:09:38
2 MS. BOERSCH: She needs Mr. Horowitz to 16:09:40
3 speak into the microphone. She's missing his. 16:09:42
4 A. No. Only my wife in Panema. 16:09:46
5 BY MR. HOROWITZ: 16:09:46
6 Q. Sir, why is it that you originally 16:09:50
7 testified that you only signed one document, which was 16:09:52
8 that closing accounting, and yet later you identified 16:09:55
9 your signature at page 19 of this other exhibit which 16:10:02
10 starts at -- which starts at our No. H000013. And 16:10:07
11 I'll hand -- 16:10:31
12 A. There we were speaking about documents 16:11:23
13 which concerned transactions of the company Somolli, 16:11:26
14 and here we're talking about documents of the bank. 16:11:37
15 Q. What other bank documents did you sign for 16:11:45
16 this -- for this company that we now call Somolli? 16:11:48
17 A. I don't remember having signed another 16:12:11
18 document. 16:12:14
19 Q. But when you gave your answer earlier today 16:12:18
20 that you signed only the final accounting document, 16:12:21
21 did you also remember that you had signed the document 16:12:26
22 that is in your hand right now, but you didn't mention 16:12:30
23 it because you thought that the question didn't ask 16:12:33
24 you to tell all the times you had signed something? 16:12:37
25 MS. BOERSCH: Objection. Vague. 16:12:42

1 ANDREAS PETROU - CROSS 16:12:42
2 Objection. Vague and argumentative. 16:12:57
3 A. I didn't understand. Please tell me again. 16:14:05
4 BY MR. HOROWITZ: 16:14:11
5 Q. Sir -- 16:14:12
6 (The question was read by the reporter.) 16:14:55
7 A. I didn't think anything. Clearly I 16:15:36
8 remember the final account because it was the period 16:15:42
9 when I put in my resignation as director. And 16:15:46
10 speaking genuinely -- frankly speaking, if I had not 16:15:56
11 seen my signature on this document, I would not have 16:16:00
12 remembered that I had signed another document apart 16:16:05
13 from the final account. 16:16:09
14 Q. Mr. Petrou, do you remember which of these 16:16:18
15 three people spoke English to you? 16:16:22
16 A. I think it's Mrs. Tymoshenko. Little 16:16:50
17 English she was speaking. I think it was 16:16:54
18 Mrs. Tymoshenko. 16:16:57
19 Q. And did she come into your wife's travel 16:17:01
20 agency and ask for help finding a lawyer? 16:17:05
21 A. No. She was looking for a certain lawyer. 16:17:35
22 She came to the office and they were asking for a 16:17:38
23 certain lawyer. 16:17:41
24 Q. And what -- and who is that certain lawyer 16:17:42
25 that they were looking for? 16:17:51

1 ANDREAS PETROU - CROSS 16:17:51
2 A. I told you I don't remember mentioning a 16:18:09
3 name and who -- mentioning a name and who. 16:18:13
4 Q. Are you saying that they did not mention a 16:18:19
5 name, or are you saying that your memory now does not 16:18:22
6 allow you to remember the name that was said? 16:18:25
7 A. I repeat, I say that I don't remember them 16:18:53
8 mentioning a name and who. 16:18:57
9 Q. How is it then that you recommended a 16:19:04
10 lawyer to them? 16:19:09
11 A. I said in the morning as well that we told 16:19:32
12 them, if you don't find the person, the man you are 16:19:36
13 looking for, then tell us to help you. 16:19:40
14 Q. Sir, please help me. These three 16:19:44
15 Ukrainians come to your wife's travel agency and they 16:19:55
16 are looking for a lawyer whose name you don't 16:19:59
17 remember, right? 16:20:03
18 A. Yes. 16:20:20
19 Q. You are the mayor of that town, right? 16:20:21
20 A. Of course. 16:20:33
21 Q. That is a position of both honor and 16:20:34
22 responsibility, true? 16:20:37
23 A. Great responsibility. 16:20:49
24 Q. And it is also part of your cultural 16:20:52
25 heritage to help strangers. Isn't that true also? 16:20:55

- 1 ANDREAS PETROU - CROSS 16:20:55
- 2 A. Of course, it's true. And we are proud of 16:21:16
- 3 this. 16:21:19
- 4 Q. In fact, there's a special word for it in 16:21:21
- 5 your language, isn't there? 16:21:23
- 6 A. There are many words. 16:21:45
- 7 Q. Is it klayos? Some word like that, Klayos? 16:21:47 16:21:47
- 8 Some word like that. I went to college. I tried to 16:21:56
- 9 study. I guess I didn't study that word. 16:22:00
- 10 I'll withdraw that question. 16:22:03
- 11 Sir, with all of that, you just let these 16:22:08
- 12 three people leave your wife's business without 16:22:12
- 13 helping them find the attorney that they were looking 16:22:16
- 14 for? 16:22:19
- 15 A. Despite our good disposition that we 16:23:03
- 16 couldn't find what they were looking for, but in 16:23:09
- 17 addition to our good disposition, we showed all -- we 16:23:12
- 18 showed all our willingness to help them find another 16:23:16
- 19 lawyer. 16:23:20
- 20 Q. But -- let me withdraw that. 16:23:22
- 21 Sir, in Cyprus, do they have something that 16:23:27
- 22 is called a telephone book? 16:23:29
- 23 A. Of course there is. 16:23:44
- 24 Q. Did they have telephone books the day that 16:23:47
- 25 those three people came into your wife's business? 16:23:50

1 ANDREAS PETROU - CROSS 16:23:50
2 MS. BOERSCH: Objection. Argumentative. 16:24:03
3 A. Could you repeat it? 16:24:16
4 (The question was read by the reporter.) 16:24:35
5 A. These are details which, if they had 16:24:36
6 occurred yesterday, I would not have remembered. 16:24:39
7 BY MR. HOROWITZ: 16:24:49
8 Q. Sir, didn't these people leave and come 16:24:50
9 back later saying they couldn't find that attorney? 16:24:53
10 A. No. From what I said in the morning as 16:25:26
11 well, I think in one or two days they communicated and 16:25:29
12 they said they did not find the lawyer. 16:25:33
13 Q. And being here right now, can you tell me a 16:25:36
14 single thing that you did to try to help these people 16:25:41
15 find the lawyer who they came to your wife's travel 16:25:46
16 agency looking for? 16:25:49
17 A. How can I remember such thing? But -- but 16:26:25
18 they themselves didn't even know what they were 16:26:39
19 looking for, who they wanted. 16:26:43
20 Q. So these people didn't even know what kind 16:26:50
21 of lawyer they wanted? Criminal lawyer? Business 16:26:53
22 lawyer, for example? 16:26:57
23 A. They didn't mention such a thing from what 16:27:30
24 I remember. 16:27:33
25 Q. Did you ask them why, if they were looking 16:27:38

1 ANDREAS PETROU - CROSS 16:27:38
2 for a lawyer, they would go to a travel agency? 16:27:40
3 MS. BOERSCH: Objection. Argumentative. 16:28:02
4 A. No. 16:28:10
5 BY MR. HOROWITZ: 16:28:12
6 Q. Sir, is your wife's travel agency very 16:28:13
7 close to the airport? 16:28:17
8 A. No. It is 40 kilometers away. 16:28:30
9 Q. What was the nearest hotel to your wife's 16:28:41
10 travel agency? 16:28:45
11 A. In our area, the municipality of Aglantzia, 16:29:08
12 there are no hotels. The nearest one there is Hilton. 16:29:13
13 Q. The Park Hilton? 16:29:19
14 A. No. Hilton. 16:29:23
15 Q. And how far is the Hilton from your wife's 16:29:29
16 travel agency? 16:29:31
17 A. I'm not an expert, but I think two 16:29:55
18 kilometers. 16:29:57
19 Q. What made you direct them to attorney 16:30:03
20 Papapetrou? 16:30:06
21 A. The office Papapetrou Skordis are the legal 16:30:57
22 consultants of the municipality of Aglantzia. That is 16:31:05
23 why I know that it is one of the best offices. And 16:31:17
24 that's the reason why we indicated this office to 16:31:25
25 them. 16:31:27

1 ANDREAS PETROU - CROSS 16:31:27
2 Q. And did you go with these three people to 16:31:31
3 the office of Papapetrou and Skordis? 16:31:34
4 A. Since they came to an understanding, an 16:32:03
5 agreement between them, they called me on the second 16:32:05
6 or third day and we all met together. That is what I 16:32:09
7 said in the morning, too. 16:32:14
8 Q. Who is it that you are saying came to an 16:32:24
9 understanding? The attorneys and these three people? 16:32:27
10 Is that what you're expressing? 16:32:31
11 A. Yes. 16:33:01
12 Q. And then attorney Papapetrou called you and 16:33:01
13 asked you to come to his office? Is that what 16:33:01
14 happened some time later? 16:33:01
15 A. Yes. 16:33:34
16 Q. By the way, did these attorneys help form 16:33:34
17 Team Pool company for your family? 16:33:34
18 A. No. They had no connection. 16:33:41
19 Q. How about Panema? 16:33:47
20 A. Yes, I think it is them, yes, who made the 16:33:59
21 Articles of Association. Memorandum. Memorandum. 16:34:03
22 The memorandum. 16:34:10
23 Q. If Team Pool and Panema showed up on 16:34:16
24 documents for Somolli, do you have any idea how that 16:34:21
25 would have happened? 16:34:27

1 ANDREAS PETROU - CROSS 16:34:27
2 A. I don't think so. But probably the first 16:35:03
3 stage were nominee of Somolli, the first small stage, 16:35:34
4 and afterwards the businesses Papapetrou took over. 16:35:42
5 Q. Sir, in your 1998 statement to the Nicosia 16:35:58
6 police, why did you tell them that your son, or wife 16:36:03
7 and son, had a company called Team Pool Estates? 16:36:08
8 A. Probably the man asked me. 16:36:39
9 Q. Sir, don't you find it peculiar that you 16:36:44
10 are being questioned about Somolli Company and for 16:36:48
11 what appears to be no reason Team Pool Estates gets 16:36:56
12 brought up? 16:37:02
13 MS. BOERSCH: Objection. Argumentative. 16:37:04
14 A. Could I -- could the question be read back 16:37:56
15 to me. 16:37:59
16 (The question was read by the reporter.) 16:38:25
17 A. Peculiar? I find it very strange to be 16:38:42
18 asked about Somolli because they know its owners, but 16:38:45
19 I had no involvement at all in their business. 16:38:51
20 BY MR. HOROWITZ: 16:39:03
21 Q. Sir, isn't it the truth that these 16:39:12
22 attorneys set up the corporation with you as a nominee 16:39:12
23 director, Time Pool as a nominee shareholder. 16:39:16
24 THE INTERPRETER: Time pool? Team Pool 16:39:26
25 who? 16:39:30

1 ANDREAS PETROU - CROSS 16:39:30
2 MR. HOROWITZ: Team Pool. 16:39:31
3 BY MR. HOROWITZ: 16:39:33
4 Q. Time pool. Sorry. Team Pool. 16:39:33
5 Let me start over. 16:39:37
6 Isn't it true that these attorneys set up 16:39:39
7 this corporation with yourself as nominee director, 16:39:41
8 Team Pool Estates as a nominee shareholder and Panema 16:39:46
9 Tours as another nominee shareholder? 16:39:57
10 MS. BOERSCH: Objection. Argumentative. 16:40:02
11 And lack of foundation. Lack of foundation. 16:40:03
12 (The question was read by the reporter.) 16:42:09
13 A. But we have answered this. The Team Pool 16:42:31
14 and Panema were nominees for the first stage for a 16:42:33
15 very short period of time. 16:42:38
16 BY MR. HOROWITZ: 16:43:19
17 Q. Sir, why would you, for complete strangers, 16:43:19
18 put yourself as director and your family's businesses 16:43:19
19 as nominee shareholders for a company that they are 16:43:19
20 starting when you know nothing about them or their 16:43:19
21 company? 16:43:19
22 MS. BOERSCH: Objection. Argumentative and 16:43:19
23 misstates his testimony. 16:43:19
24 THE COURT: States? 16:43:22
25 MS. BOERSCH: Misstates. Incorrectly 16:43:23

1 ANDREAS PETROU - CROSS 16:43:23
2 characterizes his testimony. 16:43:25
3 THE INTERPRETER: Why would you for 16:43:51
4 complete strangers? 16:43:51
5 (Translation). 16:43:55
6 THE INTERPRETER: Put yourself as director. 16:44:06
7 (Discussion in Greek) 16:44:11
8 A. It is not for them and their company. It 16:45:26
9 is not for them and their company that I put myself as 16:45:29
10 director, and for both companies nominees. But I put 16:45:33
11 myself because I had, and I have, complete trust in 16:45:39
12 the office Skordis & Papapetrou, and because it was 16:45:43
13 for a short period of time. 16:45:49
14 BY MR. HOROWITZ: 16:46:01
15 Q. Did you ever ask why you were committing 16:46:02
16 the financial assets of your family to a company for 16:46:06
17 people from Ukraine? 16:46:13
18 MS. BOERSCH: Objection. Argumentative. 16:46:16
19 Lacks foundation. Assumes facts not in evidence. 16:46:17
20 A. Ask who? 16:47:15
21 BY MR. HOROWITZ: 16:47:16
22 Q. The lawyers. Papapetrou, or Skordis? 16:47:16
23 A. I replied to why before, because this 16:47:46
24 occurred because I had, and I have, complete trust in 16:47:50
25 the office Papapetrou; and this would have happened 16:47:53

1 ANDREAS PETROU - CROSS 16:47:53
2 for a very short period of time. 16:47:56
3 BY MR. HOROWITZ: 16:48:10
4 Q. And you did this for no money at all, 16:48:11
5 right? 16:48:14
6 A. Very correct. Most correct. 16:48:25
7 Q. And just one more point of clarification. 16:48:29
8 You were not at all inquiring as to why these people 16:48:38
9 couldn't put their own names on a company that they 16:48:44
10 were starting? 16:48:48
11 A. This happened and takes place by virtue of 16:49:47
12 the laws of the Republic of Cyprus. That is, whatever 16:49:54
13 the laws of the Republic of Cyprus provides happened. 16:49:57
14 Q. And, sir, did you have such trust in 16:50:10
15 Mr. Papapetrou that you allowed him to sign your name 16:50:13
16 to documents if he believed that it was proper? 16:50:17
17 MS. BOERSCH: Objection. Argumentative. 16:50:27
18 Assumes facts not in evidence. Lacks foundation. 16:50:28
19 MR. CHRISOMILAS: Would you read it. 16:50:49
20 THE INTERPRETER: If you believed that it 16:50:53
21 was proper. 16:50:54
22 MR. CHRISOMILAS: Do you have an objection? 16:51:02
23 MS. BOERSCH: I did, yes. 16:51:03
24 THE COURT: (In Greek). 16:51:09
25 MR. DEMETRIOU: We object to the present 16:52:35

1 ANDREAS PETROU - CROSS 16:52:35
2 question. 16:52:36
3 THE INTERPRETER: Mr. Demetriou says this. 16:52:36
4 We object to the present question. I 16:52:39
5 consider in the manner it has been formulated it seeks 16:52:40
6 an answer from the witness which might involve him and 16:52:44
7 other persons in the offense of forgery or in -- 16:52:47
8 forgery. Since, if I have understood the question 16:52:54
9 well, the suggestion is that he allowed another person 16:52:57
10 to sign on his behalf something, which is an offense. 16:53:01
11 MS. BOERSCH: And my objection, was it 16:53:07
12 translated? 16:53:09
13 My objection was it assumes facts not in 16:53:10
14 evidence, which is similar. 16:53:14
15 THE INTERPRETER: No -- says the court -- 16:55:30
16 no suggestion has been made that he allowed another 16:55:32
17 person, and specifically the lawyer Papapetrou, to 16:55:36
18 sign anything illegal. He did not ask this question. 16:55:40
19 By virtue of the law I cannot make the witness answer 16:55:45
20 a question which can -- compel the witness to answer a 16:55:51
21 question which incriminates him. He's not asked such 16:55:57
22 a question. 16:56:01
23 The question put is if he had such trust in 16:56:02
24 the lawyer who was named to give him authorization to 16:56:04
25 sign where it deemed proper. This does not mean 16:56:08

1 ANDREAS PETROU - CROSS 16:56:08
2 something illegal. As the specific question is, it 16:56:12
3 does not aim to place to the witness an authorization 16:56:16
4 for an illegal act. 16:56:21
5 So within this framework, I do not consider 16:56:24
6 there is anything objectionable to the question in 16:56:27
7 this manner, because due to the fact that influence 16:56:32
8 affecting a third person falls within the framework 16:56:48
9 where the law gives a power to me to allow the witness 16:56:58
10 not to answer the question. So I will call upon the 16:57:05
11 witness to answer. 16:57:18
12 I note -- I see that the witness 16:57:18
13 continuously is willing to answer the question, but 16:57:18
14 that is irrespective of the ruling of the Court. 16:57:18
15 A. I have trust in Mr. Papapetrou and many 16:57:39
16 other people. This is -- this does not mean that they 16:57:43
17 can sign in my name anything without having my written 16:58:22
18 authorization, and for them to sign a document, the 16:58:26
19 other side must be convinced that they are authorized 16:58:29
20 to do so. 16:58:32
21 BY MR. HOROWITZ: 16:58:43
22 Q. Sir, you testified that you thought your 16:58:43
23 job as director would be temporary. How did you 16:58:45
24 expect to be removed as director? 16:58:49
25 A. I didn't think, but that was the actual 16:59:38

1 ANDREAS PETROU - CROSS 16:59:38
2 fact, and for me to be removed, definitely the lawyer 16:59:42
3 would have taken the necessary action together with 16:59:45
4 Somolli. 16:59:53
5 MR. HOROWITZ: Sir, I have a document I am 17:00:16
6 going to mark as D6004. 17:00:18
7 (Resolution of the Bank of 17:00:23
8 Cyprus was marked Defendant's Exhibit 17:00:23
9 No. 6004.) 17:00:24
10 MR. HOROWITZ: And I have shown it to 17:00:54
11 counsel. May I show it to the Court, please. 17:00:54
12 You may show it to the witness. 17:01:11
13 BY MR. HOROWITZ: 17:01:11
14 Q. Sir, is that your signature on the last 17:01:24
15 page? 17:01:26
16 A. Yes. In English. 17:01:27
17 Q. When you signed that document, did you have 17:01:36
18 any understanding as to what your signature on that 17:01:38
19 document meant? 17:01:43
20 A. Because my English is not great, it must 17:02:24
21 have been explained to me for me to sign at that time. 17:02:27
22 And we're speaking about the 2nd of October 1992, 17:02:31
23 which is 11 years and 2 months ago. 17:02:35
24 Q. Well, sir, if you would have asked for 17:02:50
25 someone to explain what your signing of that document 17:02:53

1 ANDREAS PETROU - CROSS 17:02:53
2 means, why would you not have asked them to explain 17:02:59
3 why having your name as director of Somolli was done? 17:03:03
4 A. I didn't understand it. 17:04:10
5 (The question was read by the reporter.) 17:04:16
6 A. But I said for me to sign it, they must 17:04:39
7 have explained it to me. 17:04:42
8 THE COURT: The question is, since you 17:05:13
9 asked someone to explain that document to you, then 17:05:15
10 why didn't you ask them to explain to you why your 17:05:20
11 name as director of Somolli was placed. That was the 17:05:22
12 question you were asked to answer. 17:05:25
13 A. I think that was also answered in the 17:05:57
14 morning, that they had no one else here they knew, and 17:06:00
15 I went in as director temporarily until their problem 17:06:04
16 was sorted out. 17:06:09
17 BY MR. HOROWITZ: 17:06:35
18 Q. And what problem did you just refer to that 17:06:36
19 needed to be sorted out? 17:06:39
20 A. To find a man -- to find a man to put in as 17:07:05
21 director, to appoint as director. 17:07:08
22 Q. So do you know whether or not attorney 17:07:18
23 Papapetrou ever signed your name to any Somolli 17:07:22
24 documents? 17:07:28
25 A. No. And I don't believe such a thing. 17:07:54

1 ANDREAS PETROU - CROSS 17:07:54
2 Q. Mr. Petrou, in 1997, when you signed that 17:08:01
3 final accounting, you could see that business had been 17:08:04
4 done, right? 17:08:08
5 MS. BOERSCH: Object. Objection, vague. 17:08:25
6 And assumes facts not in evidence. 17:08:28
7 A. I had no involvement in the transactions of 17:09:09
8 this company. That is why in 1997 I signed formally 17:09:12
9 the final accounts upon the indication of 17:09:21
10 Mr. Papapetrou. 17:09:25
11 BY MR. HOROWITZ: 17:09:29
12 Q. And didn't you question how this company 17:09:33
13 could have had business ongoing when you were the 17:09:37
14 director and had not signed anything since 1992? 17:09:40
15 A. Since I had no involvement nor any 17:10:25
16 signature it didn't interest me what this company was 17:10:32
17 doing. 17:10:42
18 Q. Sir, isn't it a normal, completely legal 17:10:44
19 business in Cyprus for citizens to serve on 17:10:48
20 corporations as nominee directors? 17:10:54
21 A. I didn't understand the question. 17:11:04
22 Q. Isn't it a completely normal and completely 17:11:06
23 legal business that is commonly done in Cyprus for 17:11:10
24 citizens of this country to sit as directors for 17:11:14
25 Cyprus based companies where there's foreign 17:11:30

1 ANDREAS PETROU - CROSS 17:11:30
2 ownership? 17:11:33
3 MS. BOERSCH: Objection. Calls for 17:11:45
4 speculation, improper opinion, and vague. 17:11:46
5 THE INTERPRETER: You said calls for 17:12:02
6 speculation? 17:12:03
7 MS. BOERSCH: Calls for speculation, 17:12:05
8 improper opinion, and the question is vague. 17:12:07
9 THE INTERPRETER: To sit. To sit as 17:12:53
10 directors? Cyprus based? 17:12:54
11 Improper opinion did you say, or 17:13:36
12 information? 17:13:37
13 MS. BOERSCH: Improper opinion. 17:13:39
14 Opinion testimony is typically improper in 17:13:52
15 the U.S., so improper in that sense. 17:13:54
16 (The question was read by the reporter.) 17:14:36
17 A. I am not a trader. I'm not a businessman. 17:15:14
18 I went in as director, as I stressed, temporarily. 17:15:17
19 The other things can be left to the law. 17:15:22
20 BY MR. HOROWITZ: 17:15:31
21 Q. I apologize if I was not clear enough. I 17:15:34
22 want to know if it is your understanding as of the 17:15:46
23 time you entered into this transaction that it was 17:15:55
24 both common and completely legal in Cyprus for a 17:16:02
25 citizen to be a nominee owner of a Cyprus corporation, 17:16:08

1 ANDREAS PETROU - CROSS 17:16:08
2 or a nominee director, on behalf of foreign owners? 17:16:13
3 MS. BOERSCH: Same objections. 17:16:30
4 A. I think I have answered. 17:17:38
5 BY MR. HOROWITZ: 17:17:46
6 Q. I don't understand that you have. Would 17:17:46
7 you be kind enough to answer yes or no for my benefit, 17:17:49
8 please. 17:17:56
9 A. Your Honor, could you read the question to 17:18:13
10 me. 17:18:15
11 (The question was read by the reporter.) 17:18:18
12 A. Which transaction? That I went in as a 17:19:18
13 director? Is this the transaction? 17:19:21
14 BY MR. HOROWITZ: 17:19:24
15 Q. Yes, sir. 17:19:25
16 A. Definitely. Every signature of every 17:19:37
17 person binds him by virtue of the law. 17:19:40
18 Q. I'm going to approach this from a different 17:19:52
19 way so that we can -- 17:19:54
20 THE INTERPRETER: No. 17:20:08
21 BY MR. HOROWITZ: 17:20:56
22 Q. And is it correct -- sorry? 17:20:57
23 A. Yes. 17:21:02
24 MR. HOROWITZ: See, I'm coming -- 17:21:07
25 THE COURT: No. It's not necessary. The 17:21:11

1 ANDREAS PETROU - CROSS 17:21:11
2 question put to you is whether at the material time 17:21:13
3 when what you say took place you believed that it was 17:21:18
4 completely legal for a Cypriot -- 17:21:21
5 THE INTERPRETER: One minute, please. 17:21:21
6 THE COURT: -- that it was completely legal 17:22:02
7 for a Cypriot citizen -- director of a corporation in 17:22:04
8 Cyprus, as explained to you, in Cyprus. That is the 17:22:09
9 spirit of the question and that is what you are called 17:22:12
10 upon to answer. 17:22:15
11 The question will be read out to you again 17:22:16
12 for you to know what is the question. That is what 17:22:17
13 the question is. 17:22:20
14 THE WITNESS: I don't want it to be read to 17:22:22
15 me. 17:22:24
16 THE COURT: No. I would like it to be read 17:22:26
17 out to you. 17:22:28
18 (The question was read by the reporter.) 17:22:59
19 A. By virtue of the legal opinion of 17:23:09
20 Mr. Papapetrou, yes, it was legal. 17:23:12
21 BY MR. HOROWITZ: 17:23:21
22 Q. And then about six years later, the 17:23:22
23 government of Cyprus, of which you served in the role 17:23:28
24 of mayor, approached you with questions from the 17:23:33
25 government of Ukraine about this transaction; is that 17:23:37

1 ANDREAS PETROU - CROSS 17:23:37
2 true? 17:23:41
3 A. I don't know if it is from the government 17:24:34
4 of Ukraine, but from the police force of Cyprus that I 17:24:36
5 was approached. 17:24:41
6 Q. And in fact they showed you over 60 17:24:53
7 documents relating to Somolli; isn't that right? 17:24:56
8 THE INTERPRETER: I didn't hear the 17:25:04
9 question. In fact, they showed you -- 17:25:05
10 MR. HOROWITZ: They showed you. 17:25:07
11 MS. BOERSCH: Objection. Vague. Who is 17:25:16
12 they? 17:25:18
13 MR. HOROWITZ: I mean the police. 17:25:25
14 A. They didn't show me documents. They 17:25:55
15 mentioned to me the number of documents, which numbers 17:25:58
16 are written in the statement as the police showed them 17:26:01
17 to me. 17:26:05
18 BY MR. HOROWITZ: 17:26:16
19 Q. And was this before or after you had your 17:26:16
20 name removed as director? 17:26:20
21 A. One and a half years later. 17:26:38
22 Q. So you had your name removed -- so you had 17:26:41
23 your name removed as director, and one and a half 17:26:45
24 years later your own country's police department shows 17:26:48
25 you all these documents that supposedly have your 17:26:52

1 ANDREAS PETROU - CROSS 17:26:52
2 signature on it, but you say it's not mine, right? 17:26:56
3 A. Most correct. 17:27:39
4 Q. And did you then go to your trusted 17:27:40
5 attorney, Mr. Papapetrou, and ask him how such a thing 17:27:44
6 could have happened? 17:27:49
7 MS. BOERSCH: Objection. Argumentative. 17:28:06
8 A. Of course I communicated with 17:28:31
9 Mr. Papapetrou. I told him that the police had come, 17:28:33
10 and so on. And he said, since it doesn't have your 17:28:37
11 signature, there is no problem. 17:28:41
12 BY MR. HOROWITZ: 17:28:52
13 Q. Did you ask him who signed my name, Nicosia 17:28:52
14 Petrou, to these documents? 17:28:59
15 A. I didn't ask him because it wasn't my 17:29:17
16 signature and it didn't concern me from then on. 17:29:26
17 Q. Sir, isn't it true that you told the police 17:29:36
18 of Cyprus that as far as the forgery of your signature 17:29:39
19 is concerned, you have a complaint and you will 17:29:45
20 communicate with your lawyers to take the necessary 17:29:49
21 legal actions against every responsible person? 17:29:55
22 A. The police came to me on three occasions. 17:30:40
23 Now, which occasion are you speaking about? 17:30:45
24 Q. Sir, on any occasion, did you make such a 17:30:51
25 statement? 17:30:54

- 1 ANDREAS PETROU - CROSS 17:30:54
2 A. Yes. In one of the statements I mentioned, 17:31:35
3 it is a forgery of my signature, and I will come to an 17:31:38
4 agreement with my lawyer to take steps against those 17:31:48
5 who did it. 17:31:52
6 Q. And what, if anything, have you ever done 17:32:01
7 to find out who did that, signing your name? 17:32:04
8 A. I asked for the opinion of my lawyer, who 17:32:50
9 told me to wait for the outcome of this case, and we 17:32:53
10 will keep an eye on it. 17:32:57
11 Q. And you never asked Mr. Papapetrou who he 17:33:07
12 thought signed your name? Or if he knew? 17:33:12
13 A. No. No, because it is those of Somolli who 17:33:31
14 should have answered, and they can't find them. 17:33:58
15 Q. You said, they can't find them. Who can't 17:34:06
16 find them? 17:34:09
17 A. Me. 17:34:22
18 Q. What have you done to try to find them? 17:34:26
19 A. I neither did, nor will I do. My lawyers 17:34:45
20 will. 17:34:48
21 Q. And that's when this case is over, right, 17:34:55
22 sir? 17:34:58
23 A. I said when we will see the outcome of this 17:35:14
24 case. 17:35:18
25 Q. Why does the outcome of the prosecution of 17:35:22

1 ANDREAS PETROU - CROSS 17:35:22
2 the United States against the former Prime Minister of 17:35:27
3 Ukraine, Mr. Pavel Ivanovich Lazarenko, affect when 17:35:29
4 you deal with your matters with Somolli? 17:35:34
5 A. I didn't understand it. 17:37:07
6 (The question was read by the reporter.) 17:38:22
7 THE INTERPRETER: When you deal. 17:38:22
8 THE COURT: Can you repeat your question so 17:38:34
9 as to be clear for the record. 17:38:44
10 MR. HOROWITZ: Yes. 17:38:44
11 BY MR. HOROWITZ: 17:38:44
12 Q. Why does the resolution of the action by 17:38:44
13 the United States of America against former Prime 17:38:46
14 Minister of Ukraine, Pavel Ivavovich Lazarenko, affect 17:38:52
15 what happens with your dealings with Somolli? 17:39:00
16 A. I did not know, nor do I know, if Somolli 17:40:36
17 is connected, and how, with the former Prime Minister 17:40:42
18 of Ukraine, and if it will affect the outcome of the 17:40:48
19 case in the United States. This thing for me is 17:40:53
20 unknown. The courts will decide. 17:40:57
21 Q. But you just said, sir, that you were going 17:41:17
22 to wait until this case is over before you take any 17:41:20
23 action about your signatures being signed by someone 17:41:24
24 else. What do you know about this case, U.S. versus 17:41:29
25 Mr. Lazarenko? 17:41:57

1 ANDREAS PETROU - CROSS 17:41:57
2 MR. HOROWITZ: I have very little to go. I 17:42:13
3 respect your time greatly. 17:42:15
4 THE COURT: As we don't have a connection, 17:42:23
5 I have to ask you, because at six o'clock the court 17:42:24
6 automatically closes-- I don't mind staying here for a 17:42:28
7 while -- for how much it would take to end the 17:42:33
8 procedure. But the stenographer would have to leave. 17:42:38
9 So I have to make that address, I have to arrange for 17:42:43
10 another one to come. So if you are not going to 17:42:47
11 finish at 6 o'clock just tell me so I can make 17:42:51
12 arrangements. 17:42:55
13 MR. HOROWITZ: Let me tell you what I have. 17:42:57
14 Once I get this answer, I have one question about the 17:42:58
15 Ukraine government. Then I need to call my client and 17:43:00
16 see what he has. 17:43:05
17 May I perhaps just talk to my client 17:44:11
18 quickly to see what he thinks? 17:44:14
19 THE COURT: If you'd like. 17:44:17
20 MR. HOROWITZ: If you can just give me that 17:44:19
21 handset, please. 17:44:24
22 (Discussion off the record) 17:44:24
23 MR. HOROWITZ: We should be able to finish. 17:44:49
24 Okay. I'm putting you back on speaker. 17:44:52
25 THE COURT: Can we proceed? 17:44:57

1 ANDREAS PETROU - CROSS 17:44:57
2 MR. HOROWITZ: Let the question, the last 17:45:10
3 question be read to the witness for him to answer. 17:45:12
4 (The question was read by the reporter.) 17:45:57
5 A. Yes. That's what I said. But I don't know 17:46:14
6 the slightest thing about the case, Lazarenko, with 17:46:17
7 the courts of the U.S. 17:46:21
8 BY MR. HOROWITZ: 17:46:30
9 Q. But you do know that the government of 17:46:34
10 Ukraine is concerned about this matter involving 17:46:36
11 Somolli; isn't that true? 17:46:44
12 A. I don't know such a thing. 17:47:10
13 Q. Didn't you tell the Cyprus police on the 17:47:15
14 27th day of May 1999 that I, meaning you, Mr. Petrou, 17:47:21
15 want to believe that the Ukrainian authorities will 17:47:31
16 also take the necessary measures within the framework 17:47:37
17 of their legislation. 17:47:42
18 THE INTERPRETER: Excuse me. Is it the 17:48:01
19 27th of May, the date you said? 17:48:04
20 MR. HOROWITZ: Right. 17:48:42
21 A. Of course. This thing goes without saying. 17:48:51
22 Every country has its own legislation. 17:48:54
23 BY MR. HOROWITZ: 17:49:04
24 Q. Sir, I appreciate it's late, but I'm not 17:49:05
25 asking you about the legislation of Ukraine. I want 17:49:11

1 ANDREAS PETROU - CROSS 17:49:11
2 to know whether you made the statement to the Cyprus 17:49:25
3 police officer who interviewed you on May 27, 1999, 17:49:29
4 that I want to believe that the Ukrainian authorities 17:49:35
5 will also take the necessary measures within the 17:49:42
6 framework of their legislation. So the question is, 17:49:47
7 did you say that, or not? 17:49:52
8 A. I don't remember it. But for me to have 17:50:44
9 said it, it is correct. 17:50:47
10 THE INTERPRETER (SAN FRANCISCO): Hello. 17:50:47
11 Hello. 17:51:11
12 MR. HOROWITZ: We're here. We're here. 17:51:11
13 (Deposition by Andreas Petrou,
14 Municipality of Aglantzia, Bates
15 S0016646 and S0016647 was marked
16 Defendant's Exhibit No. 6005.)
17 BY MR. HOROWITZ:
18 Q. I now have a document that I have marked as 17:51:16
19 D6005, starts at Bates -- it starts at S0016 -- let me 17:51:19
20 start over. I'm sorry. 17:51:30
21 S001646 and 7. And also I'm including the 17:51:32
22 English translation -- I'm including the English 17:51:58
23 translation. I have shown it to all counsel. I may 17:52:02
24 now show it to the Court. And it is my intention to 17:52:09
25 reference the last page, the last sentence attributed 17:52:18

1 ANDREAS PETROU - CROSS 17:52:18
2 to the witness. 17:52:21
3 BY MR. HOROWITZ: 17:52:39
4 Sir, if you would look at that document -- 17:52:41
5 only the Greek portion, of course -- and when you have 17:52:43
6 had a chance to look at it, let me know and then I'll 17:52:55
7 ask you one or two questions. 17:52:59
8 THE WITNESS: Your Honor, with the 17:53:43
9 previous question, from what I see here in this 17:53:44
10 statement, it speaks about the forgery. 17:53:47
11 THE COURT: Answer what you are being 17:53:51
12 asked. 17:53:53
13 THE WITNESS: No. I'm speaking about the 17:54:00
14 previous one. 17:54:01
15 THE COURT: All right. 17:54:05
16 BY MR. HOROWITZ: 17:54:13
17 Q. Mr. Petrou, can I ask you please a question 17:54:13
18 about the document I just handed you. 17:54:16
19 Do you recognize What that document is? 17:54:29
20 A. Yes. It is my first statement to the 17:54:55
21 police of Cyprus. 17:54:57
22 Q. And would you please turn to the second 17:55:04
23 page of that document. And, of course, you see at the 17:55:06
24 very bottom where the police officer has a statement. 17:55:16
25 Do you see that part? 17:55:20

1 ANDREAS PETROU - CROSS 17:55:20
2 A. Yes. 17:55:34
3 Q. And right above that there is a statement 17:55:34
4 that is attributed to you. Do you see that? And I'm 17:55:37
5 just drawing your attention to the very last sentence 17:55:56
6 that is attributed to you. 17:55:59
7 Would you kindly read that last sentence. 17:56:09
8 A. Which last one? 17:56:23
9 Q. Not the last paragraph because that's the 17:56:26
10 police officer. Yes, where you're pointing. 17:56:28
11 Would you read that out loud so I know 17:56:31
12 you're reading the right part. 17:56:33
13 So you knew -- 17:57:24
14 MS. BOERSCH: Excuse me. Objection. I 17:57:26
15 have an objection. I move to strike the witness' 17:57:27
16 reading of hearsay into the record. 17:57:32
17 THE INTERPRETER: I move to strike the -- 17:57:36
18 MS. BOERSCH: The witness' reading of 17:57:39
19 hearsay into the record. It's improper under U. S. 17:57:40
20 Laws of evidence. 17:57:44
21 THE INTERPRETER: So the witness is reading 17:57:48
22 there. He's reading in English. He is reading in 17:57:49
23 Greek. 17:57:54
24 The documents -- additional letter rogatory 17:57:55
25 of Ukraine. 17:58:16

1 ANDREAS PETROU - CROSS 17:58:16
2 Oh, I see. The way he was reading in 17:58:25
3 Greek. Sorry. The documents which are presented to 17:58:27
4 me are included in volumes 1 to 4 with title 17:58:30
5 additional letter rogatory of Ukraine number 17:58:33
6 06-11015-1713, dated 17/4/1999 in criminal matter No. 17:58:36
7 49-830. 17:58:47
8 "MS. BOERSCH: I have an objection." 17:58:53
9 Sorry. 17:58:55
10 BY MR. HOROWITZ: 17:59:12
11 Q. So you did know that the Ukraine 17:59:12
12 authorities were involved in this investigation, 17:59:14
13 right? 17:59:16
14 THE INTERPRETER (SAN FRANCISCO): Excuse 17:59:18
15 me, what did -- 17:59:18
16 A. The continuation of the paragraph which I 17:59:32
17 read is what concerns me. It says, as regards the 18:00:31
18 forgery of my signature I have a complaint, and I will 18:00:34
19 come to an agreement with my lawyer -- with my lawyers 18:00:37
20 regarding taking the necessary legal measures against 18:00:41
21 everyone responsible. 18:00:46
22 I also want to believe that the Ukrainian 18:00:48
23 authorities would also take the necessary measures 18:00:51
24 within the -- within the framework of their own 18:00:54
25 legislation. 18:01:18

1 ANDREAS PETROU - CROSS 18:01:18
2 BY MR. HOROWITZ: 18:01:25
3 Q. And these were your own words properly 18:01:27
4 written down in that document by the police officer 18:01:30
5 and signed by you; isn't that true? 18:01:33
6 A. Yes. 18:01:51
7 MR. HOROWITZ: Thank you. Sir, I thank you 18:01:53
8 for your time, and I thank everyone. I have no 18:01:54
9 further questions. 18:01:58
10 THE COURT: Are there any questions in 18:02:10
11 reexamination? 18:02:11
12 MS. BOERSCH: No, Your Honor. 18:02:13
13 THE COURT: Mr. Chrisomilas and 18:02:25
14 Mr. Demetriou I imagine have nothing to ask? 18:02:26
15 MR. DEMETRIOU: No, Your Honor. 18:02:30
16 Is this the appropriate time to make any 18:02:39
17 provisions for the expenses of the witness? 18:02:42
18 I think it's Section 11, Your Honor, if I'm 18:03:05
19 not mistaken. 18:03:08
20 THE COURT: I don't consider that there is 18:03:59
21 anything so as to be attributed as costs to the 18:04:02
22 witness in this procedure. 18:04:06
23 Having completed these proceedings, it must 18:05:53
24 be said that the minutes of the court must be 18:05:56
25 transcribed, and after being read by the witness to be 18:05:58

1 ANDREAS PETROU - CROSS 18:05:58
2 signed by him as representing his testimony, and this 18:06:02
3 will be verified by me as the examiner. 18:06:07
4 These proceedings lasted quite some time, 18:06:11
5 and there are a lot of minutes which have to be 18:06:14
6 transcribed. Definitely it can't be done today, so I 18:06:17
7 will ask the stenographer when she expects to have the 18:06:21
8 minutes transcribed so as to give instructions to the 18:06:24
9 witness to appear before me and sign the -- and sign 18:06:29
10 the report. 18:06:33
11 From the information received from the 18:07:03
12 court stenographer, Mr. Petrou, on Tuesday, the 16th, 18:07:05
13 can you appear before me for a while. 18:07:12
14 THE WITNESS: What time, Your Honor? 18:07:21
15 THE COURT: At 8:30. Are you able to? 18:07:23
16 THE WITNESS: I can. Yes. 18:07:30
17 THE COURT: The witness is called upon and 18:08:08
18 directions are given to him to appear before this 18:08:09
19 Court to read the contents of his testimony given 18:08:12
20 today and to sign the contents as accurate contents of 18:08:15
21 what was said by him today. At 8:30. 18:08:21
22 The Court would like to thank everybody. 18:08:42
23
24 (Whereupon, the deposition was concluded at
25 6:08 p.m.)

1 ANDREAS PETROU - CROSS
 2 I, ANDREAS Petrou, do hereby certify that I
 3 have read the foregoing transcript of my testimony and
 4 further certify that said transcript, with the
 5 corrections noted below, is a true and accurate
 6 transcript of said testimony. Dated at
 7 _____, this _____ day of
 8 _____, 2004.

9

10 ERRATA SHEET
 11 REASON FOR
 12 PAGE LINE CORRECTION CHANGE

13

14 ---- ---- -----

15 ---- ---- -----

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25 ANDREAS PETROU

1 ANDREAS PETROU - CROSS
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