

*INTERNATIONAL CENTRE FOR SETTLEMENT
OF INVESTMENT DISPUTES*

RIVERSIDE COFFEE, LLC

Claimant

v.

REPUBLIC OF NICARAGUA

Respondent

ICSID CASE NO. ARB/21/16

HEARING ON JURISDICTION AND MERITS

2 July 2024

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ARBITRAL TRIBUNAL

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09:03:52 1 PRESIDENT: Good morning, all, and welcome
2 back. We have a long day ahead of us and a busy day.
3 Starting with the housekeeping issues, there are none on
4 the Tribunal's side. Is there anything on the
09:04:08 5 Claimant's side?

6 MR. APPLETON: Nothing this morning.

7 PRESIDENT: And the Respondent?

8 MS. GONZÁLEZ: Yes, Mr. President. Good
9 morning, members of the Tribunal. We do have a
09:04:20 10 housekeeping matter. It's regarding Procedural Order
11 No.11, the last procedural order, Rule 17. With respect
12 to the scope of the direct examination, we just would
13 like to understand what is going to be the dynamic. We
14 understand that Claimant is allowed ten additional
09:04:38 15 minutes to discuss new evidence, and so how is going to
16 be the dynamic?

17 Because in accordance with, I'm sorry,
18 Rule 18, the scope of direct examination is for the
19 witness -- to conduct an examination for introducing the
09:04:51 20 witness and correcting any errors of the witness
21 statement, and for that they are allocated ten minutes,
22 but in addition they may have ten additional minutes to
23 comment on new evidence.

24 Just to avoid interruptions and
09:05:07 25 objections, we would like to understand how is going to

09:05:10 1 be the dynamic if they need to set into the record what
2 is going to be the new evidence that they will be
3 presenting or how it's going to be this dynamic with
4 respect to the additional ten minutes?

09:05:23 5 Thank you, Mr. President.

6 PRESIDENT: Well, the ruling was that
7 there are ten minutes reserved for the direct
8 examination, the ordinary direct examination introducing
9 the witness, allowing the witness to make any
09:05:37 10 corrections and an additional ten minutes for questions
11 relating to any new evidence filed with the Rejoinder.
12 So it's ten plus ten.

13 Now, we could, of course, ask the Claimant
14 to indicate when they are done with the first phase and
09:05:55 15 when they start with the second phase. We didn't think
16 that it was necessary but, if necessary, that can be
17 done.

18 Mr. Appleton, will you be able to identify
19 when you are done with the standard direct examination
09:06:10 20 and when you would be moving into the second phase?

21 MR. APPLETON: Mr. President, we actually
22 think that that's not the right way to do this, and the
23 reason is is that, if you look at the nature -- well,
24 let's go back.

09:06:25 25 The Tribunal has already made a decision

09:06:27 1 that we can have this time if we asked for it, and we
2 asked for it. We might not need it, but to the extent
3 that we do need it we understand it comes from our time.

4 But the key issue here is that -- and it
09:06:38 5 was exactly the same problem we had when we wrote to the
6 Tribunal advising about our concerns about new evidence
7 and new arguments and things like that. They come up
8 thematically in the issues, so it's not as if we can now
9 say well, we have this issue, we'll ask you to summarize
09:06:58 10 what you've said about it and now there's some new
11 stuff. Sometimes it's intermixed.

12 So it would seem to us that, No.1, we've
13 indicated four witnesses, I believe all of them with the
14 exception of Mr. Miller, who we'll see later today, that
09:07:13 15 we'll need to have 20 minutes rather than 10, or at
16 least have that option.

17 Second of all, the Tribunal received
18 extensive briefings from us earlier as to why we
19 believed there were new materials and the extent of
09:07:27 20 those new materials. I don't really want to read that
21 back. If you want me to, I'll pull the motion and we
22 can go through it. You gave a lot of latitude to the
23 Respondent to be able to have those arguments and we
24 would seek to have a similar type of treatment to be
09:07:42 25 able to allow them to respond.

09:07:44 1 Since they decided that that was their
2 choice to respond in such a broad way in the last
3 pleading after the fact, and since so many of their
4 statements and pieces intermix at all points and go for
09:07:56 5 all types of witnesses all over, it is very difficult
6 now, especially as we are about to begin, to be able to
7 deal with that and we find that given the fact that
8 we've already worked with counsel for the Republic of
9 Nicaragua on the indicative schedule, we've had all
09:08:09 10 types of discussions about this. We've had no objection
11 whatsoever in the allocation of time and the pieces that
12 go with it.

13 To bring this up now just before we are
14 about to commence on direct, we find especially
09:08:22 15 disruptive and unhelpful, and we think that the easiest
16 way is the Tribunal will use its discretion, as it would
17 at any time to decide whether something should be in or
18 out, and if you rule on it, so be it.

19 PRESIDENT: The question was, rather, the
09:08:40 20 additional ten minutes that has been allocated to the
21 Claimant for questions relating to any new evidence that
22 arise out of the rejoinder, the question is -- as
23 I understand your position now, as you are describing
24 it, the Claimant's position is that there should be no
09:08:54 25 distinction between ordinary direct examination

09:08:57 1 introducing the witness, asking the witness to make
2 corrections, and questions relating to the new evidence,
3 that you should be given a block time of 20 minutes to
4 conduct your direct examination as you wish. That's
09:09:13 5 your position?

6 MR. APPLETON: Yes, because at this point
7 it would be very difficult to be able to modify, and it
8 doesn't break down that easily, to be able to say well,
9 could you please -- no, don't tell us this, we're going
09:09:24 10 to come back to it nine minutes from now.

11 We don't see why that would be helpful and
12 most direct is relatively straightforward anyways and we
13 anticipate doing direct that's relatively
14 straightforward.

09:09:40 15 PRESIDENT: Okay. Ms. González.

16 MS. GONZÁLEZ: Yes, Mr. President. Just
17 to clarify, in accordance with Rule 18, there are two
18 different phases here: direct examination which is only,
19 it says, for the purpose of correcting any errors of the
09:09:55 20 witness statements that the witnesses have already
21 introduced. That's one thing, just for that purpose.
22 In addition, there might be an additional ten minutes to
23 respond to the new evidence. Mr. Appleton, during the
24 procedural call, decided that he could not call certain
09:10:11 25 witnesses and he asked additional time for his witnesses

09:10:17 1 to respond to that additional evidence.

2 One thing is new arguments that we may
3 have presented in our Rejoinder, we have the last word.

4 And another thing is that he requested
09:10:29 5 additional time for what he considered to be -- or the
6 Tribunal actually in a procedural order considered to be
7 that additional evidence. It's not open to 20 minutes
8 to discuss anything that he wants to respond to our
9 Rejoinder. It's just to respond to the additional
09:10:47 10 evidence; to the new evidence, I'm sorry.

11 MR. APPLETON: Just before we go there, I
12 simply think it would be useful that we actually look at
13 what's in Procedural Order 1 in paragraph 18.4.
14 Ms. González omitted something. I just think that it
09:11:02 15 would be helpful. Either we can bring it up or I can
16 just read it to you. It says in particular in 18.4:

17 "A party who presents a factual or expert
18 witness may conduct a brief examination for a length to
19 be agreed at the prehearing conference for the purposes
09:11:22 20 of asking introductory questions, including to confirm
21 the accuracy and completeness."

22 It's not just the accuracy and
23 completeness, it's introductory questions. To be
24 honest, I find it unusual to have to go through the
09:11:38 25 basic procedures of an international arbitration

09:11:41 1 process, but let's do it because I want to make sure
2 everyone is on the same page.

3 But the order is quite clear, and I want
4 to make sure that we have no misunderstanding. So I
09:11:52 5 don't want to belabor it; I simply wanted to flag
6 exactly what was there.

7 MS. GONZÁLEZ: Yes. Mr. President, that
8 was Procedural Order No.1 but then in Procedural Order
9 11 18(b) --

09:12:04 10 MR. APPLETON: Didn't change that part of
11 it.

12 PRESIDENT: Okay. Ms. González, you make
13 your comment and then the Tribunal will withdraw to
14 decide.

09:12:14 15 MS. GONZÁLEZ: Procedural Order No. 11,
16 which actually decided this issue, it says:

17 "Direct examination ... the party
18 presenting the witness may conduct a brief direct
19 examination for the [scope] of introducing the witness,
09:12:23 20 correcting, if necessary, any errors in the witness
21 statement. Such examination of a fact witness shall not
22 exceed ten minutes."

23 That's the scope of his direct examination
24 according to Procedural Order No.11.

09:12:37 25 PRESIDENT: We understand that the

09:12:37 1 Respondent's position is that PO11 has modified PO1, and
2 the Claimant's position is that there has been no
3 modification.

4 MR. APPLETON: Of that part of it,
09:12:47 5 correct, yes.

6 PRESIDENT: Okay. The Tribunal will
7 withdraw and we'll deliberate and revert in a moment.

8 (Tribunal conferred)

9 PRESIDENT: Okay. Here is the ruling. We
09:17:20 10 don't think there's any ambiguity actually in the
11 provisions of PO1 and PO11. The Claimant has been
12 allocated and in fact both parties have been allocated
13 ten minutes for purposes of introducing the witness,
14 asking the witness to make any corrections to the
09:17:39 15 witness statement, and to summarize the evidence as
16 stated in 18.4 of PO1.

17 So that is the scope of the first
18 ten minutes of direct examination.

19 In addition, the Claimant has been given a
09:17:58 20 further ten minutes for purposes of putting questions to
21 the witness on the new evidence arising out of the
22 Respondent's Rejoinder. So that is very clear from
23 PO11, so we ask the Claimant's counsel to comply with
24 these rulings. If you have to reorganize your
09:18:23 25 questions, you need to do that, but you need to be able

09:18:30 1 to identify which questions relate to the scope of 18.4
2 of PO1 and then the questions relating to the additional
3 scope of a further ten minutes for evidence or relating
4 to evidence arising out of the Respondent's Rejoinder.

09:18:52 5 So let's proceed on that basis. Anything
6 else in terms of housekeeping by either party?

7 MS. GONZÁLEZ: No, thank you,
8 Mr. President.

9 PRESIDENT: And there is nothing from the
09:19:07 10 Claimant.

11 MR. APPLETON: No. Don't we need to swear
12 in the witness?

13 PRESIDENT: Yes, we haven't started yet.
14 I was just asking whether you had any further
09:19:14 15 housekeeping matters?

16 MR. APPLETON: No. I thought you were
17 calling on the Claimant based on your order. So we can
18 proceed.

19 **MS MELVA JO WINGER DE RONDÓN**

09:19:16 20 PRESIDENT: So let me start with
21 Ms. Winger then. Good morning, Ms. Winger.

22 MS. RONDON: Good morning.

23 PRESIDENT: Can I first ask you to state
24 your full name for the record.

09:19:29 25 MRS. RONDÓN: Yes. Can you hear me?

09:19:31 1 PRESIDENT: Yes, we can.

2 MRS. RONDÓN: My full legal name is
3 Melva Jo Winger de Rondón.

4 PRESIDENT: Thank you very much. You have
09:19:41 5 been called as a witness of fact by the Claimant in this
6 arbitration and as a witness of fact you need to confirm
7 that you are telling the truth. You need to make a
8 declaration to that effect. For the record you should
9 have the text of the declaration in front of you. Can I
09:20:00 10 please ask you to make the declaration.

11 MRS. RONDÓN: Yes. I solemnly declare
12 upon my honor and conscience that I shall speak the
13 truth, the whole truth and nothing but the truth.

14 PRESIDENT: Thank you very much. You have
09:20:24 15 submitted two witness statements in this arbitration.
16 The first one is dated 16 September 2022, and the second
17 one, 28 October 2023. You should have hard copies of
18 these witness statements in front of you. You have
19 them?

09:20:46 20 MRS. RONDÓN: I do.

21 PRESIDENT: Can you please confirm that
22 they are your statements?

23 MRS. RONDÓN: Yes, they are.

24 PRESIDENT: I'm sure counsel has already
09:20:54 25 explained how this is going to work now. As you heard,

09:20:58 1 there will be first a direct examination of up to 20
2 minutes by counsel for the Claimant, Riverside, and then
3 there will be a cross-examination by the Respondent's
4 counsel, and then the Claimant's counsel will have a
09:21:16 5 further opportunity to ask further questions arising out
6 of the cross-examination. The three members of the
7 Tribunal may put questions to you at any time during
8 your examination. Is that understood?

9 MRS. RONDÓN: That's understood. Thank
09:21:29 10 you.

11 PRESIDENT: Very good. So over to the
12 Claimant now. Mr. Appleton.

13 MR. APPLETON: Thank you very much,
14 Mr. President.

09:21:39 15 **DIRECT EXAMINATION**

16 BY MR. APPLETON:

17 Q. Good morning. Let's just clarify on your name.
18 The President has asked you one of my questions. We
19 hear your full name. How do you want us to be able to
09:21:50 20 address you? Do you want to be Mrs. Winger de Rondón?
21 Do you want to be Ms. Rondón? We would do whatever you
22 would prefer, but please, would you tell us?

23 A. To expedite, I would say Mrs. Rondón is fine.

24 Q. Okay. Excellent, Mrs. Rondón. That's how we
09:22:07 25 will proceed. Have you ever testified before?

09:22:09 1 A. Never in my life.

2 Q. So let's just make sure that you understand
3 that everything is amplified in here, but if you don't
4 hear something, maybe someone's microphone isn't on or
09:22:20 5 something, please let us know. We've had some problems
6 already with that.

7 If something is mumbled, just let us know
8 so we can try to be as clear as we can. But we just
9 want you to be aware of that.

09:22:34 10 A. I will, thank you.

11 Q. Okay. Now, do you have any corrections to make
12 to your witness statement? I understand that you've
13 brought something with corrections?

14 A. Yes, I do have corrections.

09:22:47 15 Q. Could you tell us how many corrections you have
16 to make?

17 A. I have two corrections.

18 Q. Okay. And to which witness statements are
19 those, so at least --

09:22:56 20 A. Both corrections are in my second witness
21 statement, CWS-08, or as the President referenced,
22 October 28, 2023.

23 Q. Okay. Could you tell us what those corrections
24 are?

09:23:10 25 A. The first correction is paragraph 36, and the

09:23:19 1 first word of that paragraph is "Riverside." I'm
2 replacing it with "INAGROSA and my family."

3 Q. Okay. Do you have a second modification?

4 A. The second modification is paragraph 71 on
09:23:43 5 page 10. The last line.

6 Q. Just give us a moment so we can find it. So
7 turn the page to page 10 for 71, yes? The last line?

8 A. Yes, the last line. It's on page 10.

9 Q. And what's your change?

09:24:01 10 A. And the change is I'm striking January 2021 and
11 putting in the date 2019.

12 Q. Okay. You have no other corrections to make?

13 A. I have no other corrections.

14 Q. All right. Very good. So let's talk about
09:24:20 15 your witness statements, the two that you've filed here.

16 Do you have a role at Riverside Coffee?

17 A. I do have a role at Riverside Coffee. I am the
18 operating manager at Riverside Coffee, which is similar
19 to a CEO position in a corporation.

09:24:39 20 Q. And can you describe your ownership interest in
21 Riverside Coffee?

22 A. I own 100 percent of the member units at
23 Riverside Coffee.

24 Q. And when did you obtain this ownership?

09:24:52 25 A. I obtained Riverside Coffee on January the 2nd,

09:24:56

1 2019.

2 Q. So how long have you been personally associated
3 with Riverside Coffee?

09:25:06

4 A. Well, actually, I've been associated with
5 Riverside Coffee since its beginning, when my parents
6 established Riverside Coffee in 1999. My parents,
7 Melvin and Mona Winger, made a decision to create an
8 entity, a limited liability corporation, that would be a
9 way to invest in the project in Nicaragua, and they
10 included my parents and other family members. So I've
11 been included and been affiliated with Riverside since
12 that time.

09:25:31

13 Q. And what were your duties as Riverside's legal
14 representative to INAGROSA? Could you just describe
15 them for us so we understand?

09:25:48

16 A. So my responsibilities and duties as
17 Riverside's legal counsel included a role as an
18 ambassador. Like someone who is enhancing communication
19 between the parties, so between INAGROSA and Riverside
20 and vice versa. So between Riverside -- excuse me --
21 INAGROSA and Riverside. I was the contributor, I was
22 the voice -- excuse me -- I was the voice for the vote
23 control, the voting block, from Riverside to INAGROSA.

09:26:09

24 Q. Mrs. Rondón, I'm sorry, I asked you a slightly
25 different question that -- that you answered.

09:26:33

09:26:34 1 I asked you about your duties as the legal
2 representative, but you told us you were the legal
3 counsel?

4 A. Oh, I'm sorry. I didn't know I said that.
09:26:42 5 Thank you for correcting me.

6 Q. No, I didn't correct you. I haven't said
7 anything. Perhaps you could tell us, were you the legal
8 counsel?

9 A. No. No, I wasn't the legal counsel. Pardon
09:26:52 10 me.

11 Q. So did you mean, when you said counsel, you
12 meant legal representative?

13 A. Legal representative.

14 Q. Just want to make sure we understand.

09:27:00 15 A. Yes.

16 Q. And obviously you're the legal representative
17 here on behalf of Riverside?

18 A. I am.

19 Q. So you're obviously aware of the invasion that
09:27:13 20 took place in 2018 and this claim?

21 A. I am.

22 Q. In your second witness statement you discussed
23 the impact of the taking of Hacienda Santa Fé on you and
24 your family. I'm going to ask perhaps if you'd just
09:27:31 25 summarize briefly how this has affected you and your

09:27:35

1 family.

2 A. This has been a really horrific experience. We
3 suffered in many ways. We suffered from the actual
4 tragedy of losing our business investment. Our
09:27:56 5 employees were threatened with their lives. My husband
6 was threatened with his life. My parents, myself, my
7 husband, our daughter have all been impacted by this
8 horrific taking of our farm and the destruction of our
9 investment, the Hass avocados and the hardwood trees.

09:28:26

10 As a result of this horrific experience,
11 we have suffered -- I have personally suffered from
12 anxiety and stress and loss of concentration, and it's
13 been a terrible, horrific experience.

14 I've also seen in my husband similar.

09:28:51

15 I've seen anxiety and stress and loss of concentration.
16 No one would ever expect that this could happen. It was
17 just a really horrific experience. Actually, I want to
18 say it is a horrific experience. Not was, but is, a
19 horrific experience.

09:29:14

20 Q. Mrs. Rondón, you can take a little -- it's
21 okay. During this hearing I'm sure there are going to
22 be things that are going to be troubling. We'll do
23 everything we can.

24 I'm going to turn to some issues that

09:29:34

25 arise from the materials now that are responsive. The

09:29:38 1 Tribunal has asked us to separate it. We're finished,
2 the first part. I think I can now move to something in
3 the second. I'll need just one moment to actually find
4 something that I'm going to ground this in for the
09:29:49 5 record. Just give me one minute for that.

6 Mrs. Rondón, I'm going to raise an issue
7 that was raised in the Rejoinder Memorial by the
8 Republic of Nicaragua regarding the offer to return
9 Hacienda Santa Fé, and I just want to talk about
09:30:14 10 something in that, if that's all right.

11 So, first of all, I just want you to just
12 get the dates so that we're really clear. So the
13 invasion is in June of 2018, and the claim here is
14 brought in the spring of 2021?

09:30:36 15 A. Correct.

16 Q. It's roughly a three-year period.

17 A. Correct.

18 Q. I'll just use that to try to help us
19 understand.

09:30:43 20 So, first of all, during that three-year
21 period, from the invasion to the bringing of this claim,
22 can you describe any communications from the Nicaraguan
23 authorities to Riverside?

24 A. There were none.

09:30:58 25 Q. After that time -- so after the claim is

09:31:02 1 brought, can you discuss any communications with the
2 Republic of Nicaragua?

3 A. Yes. On September the 9th, 2021, we received a
4 letter from the counsel for Nicaragua, Paul Reichler,
09:31:21 5 and in the body of the letter he said to us Nicaragua
6 would be interested in giving you back the property.
7 You have to prove its ownership, and we'll discuss
8 conditions.

9 Q. Okay. Did Riverside send a response, do you
09:31:41 10 recall?

11 A. That very day, September the 9th, 2021, we
12 responded to the letter with the following. Do you want
13 me to --

14 Q. Sure.

09:31:52 15 A. Okay. We said we proved the ownership of the
16 property when we submitted the CAFTA claim, and we ask
17 you what those conditions might be.

18 Q. Okay. And was there a response to that letter,
19 that September 9th letter, 2021?

09:32:15 20 A. We have never received a response from that
21 letter.

22 Q. So just from your perspective, at this time you
23 own 100 percent of the shares of Riverside?

24 A. Yes.

09:32:27 25 Q. Did you reject their offer in 2021?

09:32:31

1 A. I did not.

2

MR. APPLETON: I think we have nothing further at this point. We'll turn over the witness.

4

PRESIDENT: Thank you very much,

09:32:42

5 Mr. Appleton. Over to the Respondent, Mr. Molina.

6

MR. MOLINA: Thank you, Mr. President.

7

CROSS-EXAMINATION

8

BY MR. MOLINA:

9

Q. Good morning, Mrs. Rondón.

09:32:54

10

A. Good morning.

11

Q. My name is Marco Molina. I'm with Baker

12

Hostetler. I'll be asking you some questions today.

13

A. Okay.

14

Q. First of all, a very important question.

09:33:03

15

Yesterday was your birthday, yes?

16

A. It was.

17

Q. Happy birthday.

18

A. Thank you.

19

Q. You mentioned earlier you submitted two witness

09:33:13

20

statements in this arbitration, correct?

21

A. I did.

22

Q. And you're the daughter of Mr. Melvin Winger,

23

correct?

24

A. I am the daughter of my late father, Mr. Melvin

09:33:26

25

Winger, yes.

09:33:27 1 Q. And he submitted one witness statement in this
2 arbitration, correct?

3 A. Yes.

4 Q. And you've adopted his witness statement for
09:33:34 5 the purposes of this hearing, correct?

6 A. Yes.

7 Q. You're also the daughter of Mrs. Mona Winger,
8 correct?

9 A. I am.

09:33:44 10 Q. And she's also submitted a witness statement in
11 this arbitration, correct?

12 A. Yes.

13 Q. And you've also adopted her witness statement
14 for the purposes of this hearing, yes?

09:33:55 15 A. Yes.

16 Q. Mrs. Rondón, you're a US citizen, yes?

17 A. Yes.

18 Q. You're not originally from Nicaragua, correct?

19 A. No.

09:34:05 20 Q. Your husband originally is from Nicaragua, yes?

21 A. Originally.

22 Q. Do you speak Spanish?

23 A. Yes, some. Not fluent.

24 Q. You live in Colorado?

09:34:19 25 A. Yes. Some of the time. Uh-huh, yes.

09:34:25 1 Q. Where else do you live?

2 A. Since 2020, I've been the primary caretaker for
3 my parents on the farm in southwest Kansas.

4 Q. And we established earlier you are the
09:34:39 5 operating manager of Riverside Coffee, yes?

6 A. I am.

7 Q. Riverside Coffee is a limited liability
8 corporation, yes?

9 A. Yes.

09:34:51 10 Q. And you said that your parents founded this
11 company in 1999, yes?

12 A. Yes.

13 Q. And so from 1999 to 2018, your parents were
14 members of Riverside Coffee, yes?

09:35:09 15 A. My father was a member.

16 Q. Your father was a member of Riverside Coffee?

17 A. Correct.

18 Q. Your mother was not a member of Riverside
19 Coffee?

09:35:18 20 A. No.

21 Q. Were you a member of Riverside Coffee between
22 1999 and 2018?

23 A. I was not a member. I was not a member.

24 Q. You were the legal representative for Riverside
09:35:35 25 with respect to INAGROSA, yes?

09:35:37 1 A. That is correct.

2 Q. Who else was a member of Riverside Coffee
3 between 1999 and 2018 other than your father?

4 A. Friends of my father. Ward Nairn,
09:35:55 5 Dan Senestero, Jay Housma and two other members who have
6 passed away.

7 Q. I'm just going to go through one at a time.
8 Your late father, between 1999 and 2018, he lived in
9 Kansas, yes?

09:36:16 10 A. Yes.

11 Q. He did not live in Nicaragua, correct?

12 A. Correct.

13 Q. Mr. Nairn, between 1999 and 2018, he lived in
14 the United States, yes?

09:36:30 15 A. Correct.

16 Q. He did not live in Nicaragua, correct?

17 A. Correct.

18 Q. You mentioned a Mr. Senestero and I may --

19 A. Senestero.

09:36:41 20 Q. I'm sorry. I'm waiting to see how it's
21 transcribed. Do you mind repeating it one more time?

22 A. Dan Senestero.

23 Q. Thank you. So Mr. Senestero, he lived in the
24 United States between 1999 and 2018, correct?

09:36:59 25 A. Correct.

09:36:59 1 Q. He did not live in Nicaragua during that time,
2 correct?

3 A. No.

4 Q. You mentioned earlier a Mr. Jay Hoffman, yes?

09:37:14 5 A. Jay Housma.

6 Q. Apologies. I'm trying to read the transcript.
7 Mr. Jay Housma. Between 1999 and 2018 he lived in the
8 United States, correct?

9 A. Correct.

09:37:32 10 Q. Again, the same question. He did not live in
11 Nicaragua, correct?

12 A. No.

13 Q. None of the individuals that I just
14 mentioned -- just to recap for the record, Mr. Winger,
09:37:49 15 Mr. Nairn, Mr. Senestero and Mr. Housma, none of those
16 individuals spoke Spanish between 1999 and 2018,
17 correct?

18 A. Correct.

19 Q. So I understand you were the legal
09:38:14 20 representative of Riverside Coffee with respect to
21 INAGROSA between 2013 and 2018, correct?

22 A. No, from 2013 until today.

23 Q. Oh, okay. Apologies. Let me rephrase the
24 question.

09:38:32 25 You became the representative or

09:38:35 1 Riverside's representative to INAGROSA starting in 2013,
2 yes?

3 A. That's correct.

4 Q. Who was the operating manager for Riverside
09:38:50 5 between 2013 until 2019 when you assumed that title?

6 A. My father, Melvin Winger.

7 Q. Were there any other operating managers during
8 that time?

9 A. In the very beginning, there were three
09:39:12 10 operating managers. In the very beginning. I don't
11 remember the dates exactly. So if you want me to be
12 precise, I would have to see the document because we did
13 note it in the document. There were three operating
14 managers.

09:39:31 15 Q. Your father, Mr. Melvin Winger, was one of
16 those three?

17 A. Correct.

18 Q. And who were the other two for the record?

19 A. Ward Nairn and Archie Nairn.

09:39:52 20 Q. I'm going to ask the same questions I've asked
21 about the others with respect to Mr. Archie Nairn.
22 Between 1999 and 2018, Mr. Nairn lived in the United
23 States, yes?

24 A. Yes, and Archie Nairn passed away several years
09:40:06 25 ago.

09:40:11 1 Q. As far as you're aware, between the time he was
2 an operating manager for Riverside, Mr. Archie Nairn did
3 not live in Nicaragua, correct?

4 A. No, he was no longer an operating manager as of
09:40:20 5 2003.

6 Q. Okay. So from 1999 to 2003, he did not live in
7 Nicaragua, correct?

8 A. No.

9 Q. Is it fair to say that Riverside Coffee
09:40:42 10 maintained a corporate presence in Kansas?

11 A. I mean, the term "corporate" --

12 Q. I'm not trying to be -- I'm just trying to
13 understand. Was there an office --

14 A. Yes.

09:41:03 15 Q. -- that Riverside?

16 A. Yes.

17 Q. And it was in Kansas?

18 A. It was in Kansas, yes.

19 Q. Did Riverside Coffee maintain any other offices
09:41:10 20 anywhere else?

21 A. No.

22 Q. In this office in Kansas, Riverside Coffee did
23 not maintain corporate records for INAGROSA, correct?

24 A. The corporate records were in Spanish, so
09:41:33 25 Riverside did not keep the corporate records for

09:41:35

1 INAGROSA.

2 Q. You've testified that Riverside vetted all of
3 INAGROSA'S significant business decisions, correct?

4 A. Correct.

09:41:56

5 Q. You've also testified that Riverside -- well,
6 actually today you clarified that it was actually your
7 family that reinvested its profits in INAGROSA back into
8 INAGROSA, correct?

9 A. I'm sorry. Did you say I testified?

09:42:16

10 Q. Earlier this morning, Mr. Appleton asked you if
11 you had any clarifications to your witness statement.
12 Do you remember that?

13 A. Yes.

09:42:25

14 Q. And one of the clarifications that you stated
15 into the record was with respect to the paragraph in
16 your second witness statement that concerned
17 reinvestment of profits of INAGROSA?

18 A. Yes.

09:42:43

19 Q. I'm just trying to clarify. You testified that
20 your family reinvested its profits in INAGROSA back into
21 INAGROSA, correct?

22 A. Could you restate the question, please?

23 Q. Sure. Let me just look exactly at what you
24 said. I'm just trying to make sure I understand.

09:43:16

25 You have your witness statement in front

09:43:17 1 of you, correct?

2 A. I do.

3 Q. Do you mind looking at the clarification you
4 made to paragraph 36 of your second witness statement?

09:43:27 5 A. Yes.

6 Q. Just for the record again, you asked that the
7 word "Riverside" that starts that paragraph, you asked
8 that it be replaced with "INAGROSA and my family." Do
9 you see that?

09:43:42 10 A. Yes.

11 Q. So my question is just simply your family, to
12 the extent it made profits in INAGROSA, reinvested those
13 profits back into INAGROSA, yes?

14 A. Yes.

09:44:24 15 Q. In 2013, you testified that there was a Roya
16 fungus that negatively affected INAGROSA'S business,
17 yes?

18 A. The Roya affected coffee around the world, yes,
19 including at Hacienda Santa Fé.

09:44:43 20 Q. And up until 2013, INAGROSA'S main line of
21 business was cultivating and selling coffee out of
22 Hacienda Santa Fé, correct?

23 A. Correct.

24 Q. So after 2013, after this fungus affected the
09:45:02 25 coffee crops at Hacienda Santa Fé, INAGROSA was no

09:45:06 1 longer profitable in that coffee business, correct?

2 A. I -- I don't -- I don't know the precise answer
3 to your question.

4 Q. Do you know if between 2014 and 2018 Riverside
09:45:38 5 or your family realized any profits in INAGROSA?

6 A. Could you state that again?

7 Q. Sure. Between 2014 and 2018, during a time
8 where you were the legal representative, do you happen
9 to know if Riverside realized any profits in INAGROSA?

09:45:57 10 A. We did not.

11 Q. Same question but with respect to your family.
12 Between 2014 and 2018, do you know if your family
13 realized any profits in INAGROSA?

14 A. We did not.

09:46:18 15 Q. You testified -- well, let me -- there was a
16 transition after the Roya fungus at INAGROSA from coffee
17 cultivation to avocado cultivation, correct?

18 A. Hass avocado cultivation, yes.

19 Q. Hass avocado cultivation.

09:46:40 20 A. Uh-huh.

21 Q. And, in fact, in 2016 Riverside issued a
22 resolution that it would support this transition that
23 INAGROSA was taking into Hass avocado cultivation,
24 correct?

09:46:59 25 A. That is correct.

09:47:11 1 Q. And 2016 was when that resolution was issued,
2 correct?

3 A. Yes.

09:47:22 4 Q. You're aware that INAGROSA began planting Hass
5 avocado trees in its Hacienda in 2014, correct?

6 A. I am.

7 Q. So from 2014 and 2015, as far as you know
8 there's no resolution from Riverside vetting or
9 approving the cultivation of Hass avocados at Hacienda
09:47:42 10 Santa Fé?

11 A. There is no resolution. There was discussion,
12 there was excitement. There's no resolution.

13 Q. Your family, and more specifically your
14 parents, issued several loans to INAGROSA from 1999 to
09:48:05 15 2014, correct?

16 A. Correct.

17 Q. And the interest in those loans has been
18 assumed by Riverside, yes?

19 A. Yes.

09:48:20 20 Q. And specifically, the loans came from your
21 mother, your father, and their revocable trusts, yes?

22 A. Yes, but all of their loans were transferred
23 into the revocable trust.

24 Q. Other than your parents, did anyone else make
09:48:44 25 any loans to INAGROSA?

09:48:57 1 A. You know, the other members of Riverside
2 invested in Riverside, and Riverside then invested in
3 INAGROSA.

4 Q. When you say that Riverside invested in
09:49:20 5 INAGROSA, are you referring to the loans from your
6 parents?

7 A. Yes.

8 Q. Other than the loans from your parents, I just
9 specifically wanted clarity on this, is there anyone
09:49:33 10 else that you're aware of who made a loan to INAGROSA?

11 A. You know, it's been a long time, and so I want
12 to speak the whole truth and nothing but the truth, so I
13 cannot clearly and precisely answer that question.

14 MR. MOLINA: Why don't we put up, Ricky,
09:50:04 15 document C-288, please.

16 Q. Ms. Winger, you are now being shown a document
17 that's designated at C-0288. Do you recognize this
18 document?

19 A. And the next page is the signature page, yes.

09:50:38 20 Q. This is a promissory note, correct?

21 A. Correct.

22 Q. And it was issued by Riverside Coffee, correct?

23 A. Uh-huh. Would you please restate the question.

24 Q. All I'm trying to say is this is a promissory
09:51:21 25 note between Riverside Coffee and INAGROSA, yes?

09:51:23

1 A. Yes.

2 Q. And the purpose of this note is to memorialize
3 the debts that INAGROSA owed to Riverside, correct?

4 A. Yes.

09:51:35

5 Q. If you see in the second paragraph on the left,
6 it indicates that as of the date of that note, there was
7 an outstanding debt of \$2,214,450 plus interest,
8 correct?

9 A. Correct.

09:51:50

10 Q. The interest, as indicated here, is 8 percent
11 per year, yes?

12 A. Yes.

13 Q. Compounded monthly, correct?

14 A. Correct.

09:52:04

15 MR. MOLINA: Now, Ricky, why don't you go
16 to the --

17 Q. Before we move on, there's also a term at
18 the --

09:52:15

19 MR. MOLINA: Sorry, Ricky, do you mind
20 backing up to that page. Sorry.

21 Q. You see there's a term in the middle of the
22 page there, Mrs. Rondón?

23 A. Yes.

09:52:25

24 Q. And it says that the term of this note would
25 run from December 15, 2014 through December 15, 2019,

09:52:31 1 yes?

2 A. Yes.

3 Q. So you understand that to mean that INAGROSA
4 had to pay Riverside the principal amount plus the
09:52:44 5 interest as of that December 15, 2019 maturity date,
6 yes?

7 A. Yes.

8 MR. MOLINA: Thank you, Ricky.

9 Q. There's an attachment to this promissory note.
09:53:01 10 If you don't mind going to that attachment, Ricky. Do
11 you see in the top it says schedule 1?

12 A. Yes.

13 MR. MOLINA: I'm sorry, Ricky, do you mind
14 just zooming out. I'll let you know if I need you to
09:53:12 15 zoom in. Thank you.

16 Q. Do you see that it says "Principal amounts
17 covered by the promissory note"?

18 A. Yes.

19 Q. And there's a chart or a table that indicates a
09:53:23 20 series of loans that were made to INAGROSA, correct?

21 A. Yes.

22 Q. On the left-hand column we have the dates of
23 those loans, yes?

24 A. Yes.

09:53:35 25 Q. Then we have the creditor that's giving those

09:53:38

1 loans, yes?

2 A. Yes.

3 Q. The next column is the amounts, yes?

4 A. Yes. I'm sorry.

09:53:49

5 Q. No, it's fine. And then the final column is
6 the interest rate, correct?

7 A. Correct.

8 Q. And you can see that the initial loan was made
9 by your mother?

09:53:59

10 A. Yes.

11 Q. On December 30, 1998, correct?

12 A. Yes.

13 Q. And then you see that there are several loans
14 that are made over the ensuing years, yes?

09:54:16

15 A. Yes.

16 Q. Just to be clear, between 1998 and 2003 -- and
17 I'm only stopping at 2003 because that's the last loan
18 on this page, I know there were other loans -- but just
19 to be clear, before we turn the page, all of these loans
09:54:32 20 were in furtherance of INAGROSA'S coffee business,

21 correct?

22 A. Yes.

23 Q. There was no avocado business during this time,
24 correct?

09:54:45

25 A. No.

09:54:48 1 MR. MOLINA: Ricky, do you mind going to
2 the second page.

3 Q. Okay. And this is the final table of the --
4 indicating the loans that were made to INAGROSA,
09:54:57 5 correct?

6 A. Yes.

7 Q. And you see that at the top it starts from a
8 July 30, 2003 date, and it goes all the way to
9 October 9, 2014 at the bottom, yes?

09:55:12 10 A. Yes, that's what it says.

11 Q. Now, you'll note, if you look towards the
12 bottom of that table, you'll note that the last two
13 loans were in 2014 from your mother's revocable trust,
14 correct?

09:55:25 15 A. Correct.

16 Q. And before that, the last loan had not been
17 issued until back in 2007, right?

18 A. Yes.

19 Q. So is it fair to say that almost every one of
09:55:41 20 these loans to INAGROSA happened between 1999 and 2007
21 except for the final two loans?

22 A. Yes.

23 Q. And just to be clear for the record, from 1999
24 to 2007, INAGROSA'S line of business was coffee,
09:56:01 25 correct?

09:56:03

1

A. Yes.

2

Q. During that time period, INAGROSA did not have an avocado business, correct?

3

4

A. Correct.

09:56:12

5

Q. And we'd established earlier that you recognized -- you being --

6

7

I'm sorry, let me be more precise.

8

We established earlier that Riverside recognized that INAGROSA would transition to an avocado business in 2016. Do you remember that?

09:56:25

10

11

A. I do.

12

Q. So the last two loans that you see on this table from 2014, those predated that resolution that we discussed, correct?

13

14

09:56:40

15

A. Correct.

16

Q. To be clear, after this date of October 9, 2014, your parents, either directly or through their trusts, did not make any other loans to INAGROSA, correct?

17

18

19

09:57:00

20

A. I'm sorry, could you restate the question, please?

21

22

Q. Sure. Let me just break it down, and that way it's not as wordy.

23

24

09:57:13

25

After that October 9, 2014 date that you see on the bottom part of this screen, your father did

09:57:17 1 not make any additional loans to INAGROSA, yes?

2 A. Correct.

3 Q. Your mother did not make any additional loans
4 to INAGROSA after that date, correct?

09:57:26 5 A. Correct.

6 Q. And neither your father's nor your mother's
7 revocable trusts made any additional loans to INAGROSA
8 after that date, correct?

9 A. Correct.

09:57:37 10 Q. And I'm going to ask you again because this
11 might jog your memory.

12 Do you happen to know if anyone at
13 Riverside made any loans to INAGROSA after this
14 October 9, 2014 date?

09:58:04 15 A. I'm not sure, but I -- not my parents. I don't
16 think so.

17 Q. If they had, you probably would have mentioned
18 it in your witness statements, correct?

19 A. Yes.

09:58:15 20 Q. And in your witness statements you don't
21 mention that there were any additional loans after that
22 date, correct?

23 A. Correct.

24 Q. And just to be clear -- and again, I'm just
09:58:32 25 doing this for the record -- as far as you're aware,

09:58:37 1 there's nothing that prevented your mother from making
2 additional loans to INAGROSA after October 9, 2014,
3 correct?

4 A. I don't know what you mean by the question.

09:58:48 5 Q. I'll make it easier.

6 Between 2014 and 2018, you told me that in
7 that period, 2014 and 2018 -- and I'm stopping at 2018
8 because I understand that's when you allege that your
9 investment was harmed, so I'm speaking specifically
10 between the date you see on the bottom left of that
11 screen and the moment that you allege that your
12 investment was harmed. In that period we established
13 that your family did not make any additional loans to
14 INAGROSA, correct? That's what we established?

09:59:06 15 A. Yes, that's correct.

16 Q. So my question is, is there anything that
17 prevented them from making additional loans to INAGROSA
18 in that window that I just identified?

19 A. No.

09:59:42 20 Q. You've testified --

21 MR. MOLINA: Thank you, Ricky.

22 Q. Just to be clear, before I move on --

23 MR. MOLINA: I'm sorry, Ricky, I'm going
24 to do it again. Do you mind putting it back up? This
10:00:00 25 is something I do from time to time. Sorry, Ricky.

10:00:05 1 Q. These loans, as far as you know, the principal
2 amounts and the interest amounts that are memorialized
3 by this promissory note, they were not paid in full by
4 INAGROSA as of the maturity date, correct?

10:00:32 5 A. That's correct.

6 Q. And sitting here today, we're in July 2, 2024.
7 Same question: as of today, as far as you know, INAGROSA
8 has not repaid Riverside neither the principal nor the
9 interest amounts memorialized by this promissory note,
10:00:51 10 correct?

11 A. Correct.

12 MR. MOLINA: Now you can really take it
13 down. Thanks.

14 Q. Mrs. Rondón, you've testified that Riverside
10:01:11 15 made a financial commitment of up to \$17.5 million to
16 support INAGROSA'S Hass avocado business, correct?

17 A. Correct.

18 Q. And just to be clear, that commitment was
19 conditioned on whether INAGROSA could secure outside
10:01:38 20 investment into that business, correct?

21 A. The word "conditioned" is -- I'm unclear about
22 that word, what we mean by that word.

23 Q. That's fair. Why don't we just put up
24 paragraph 34 of your first witness statement, CWS-03.

10:02:23 25 Do you see this is paragraph 34 from your

10:02:25 1 first witness statement, correct?

2 A. Yes.

3 Q. Do you see in the first line it says:

4 "If INAGROSA did not secure outside
10:02:31 5 funding to implement the expansion, Riverside was
6 prepared to invest up to \$17.5 million into INAGROSA'S
7 expansion of the Hass avocado production at Hacienda
8 Santa Fé and move INAGROSA into Hass avocado sales into
9 export markets like the United States."

10:02:53 10 Do you see that?

11 A. I do.

12 Q. So you're aware that INAGROSA tried to secure
13 outside funding to implement its expansion of its
14 plantation, yes?

10:03:05 15 A. Yes.

16 Q. And you're aware that they actually never
17 secured any outside funding for that effort, correct?

18 A. Correct.

19 Q. And as of June 2018 -- and again, I'm using
10:03:18 20 that date because that's sort of the date where we stop
21 time, so to speak, because that's when the alleged
22 events took place. I want to understand, did Riverside
23 commit and actually transfer any of these amounts, or
24 any amounts at all, to INAGROSA?

10:03:49 25 A. So I hate to keep doing this, but perhaps I'm

10:03:53 1 nervous. Perhaps I'm -- could you restate the question,
2 please?

3 Q. It was a very poorly worded question on my
4 part, so I'm going to try again. Haven't had much
10:04:09 5 coffee yet.

6 It says on the screen here that it was
7 prepared to invest up to \$17.5 million, yes?

8 A. Yes.

9 Q. My question is simply as of June 2018, did
10:04:22 10 Riverside Coffee invest \$17.5 million into INAGROSA'S
11 avocado business?

12 A. No.

13 Q. Did Riverside Coffee invest even \$1 into that
14 avocado business as of the June 2018 date?

10:04:38 15 A. No.

16 MR. MOLINA: You can take that down, thank
17 you.

18 Q. Just out of curiosity, Mrs. Rondón, that
19 commitment of up to \$17.5 million that we just saw on
10:05:00 20 the screen, that would have been funded using money from
21 your parents' trusts, yes?

22 A. Correct.

23 Q. Did Riverside have any other investors who
24 would have committed moneys towards that amount?

10:05:28 25 A. I know that the other members were very excited

10:05:33 1 about this shift. I don't want to speculate.

2 Q. That's fair.

3 Did your parents transfer any amounts of
4 money into an account that Riverside controlled for the
10:05:53 5 purposes of this commitment that you testified about?

6 A. They did not.

7 Q. Does Riverside have any other investments other
8 than INAGROSA?

9 A. No.

10:06:26 10 Q. So its only assets are whatever economic
11 interest it has with INAGROSA, correct?

12 A. Correct.

13 MR. MOLINA: I think I'm going to pass the
14 witness. Thank you, Mrs. Rondón.

10:06:46 15 MRS. RONDÓN: You're welcome.

16 PRESIDENT: Thank you very much. Any
17 questions for redirect?

18 MR. APPLETON: Yes. I need a moment to
19 technologically see if we can get the electronic system
10:06:56 20 to work. Could I have one minute?

21 PRESIDENT: Let's have a five-minutes'
22 break.

23 MR. APPLETON: Sure.

24 *(Recess taken)*

10:12:45 25 PRESIDENT: Let's go on.

10:13:38 1 MS. CONOVER: Mr. Appleton, the
2 interpreters are asking if you can speak closer to the
3 microphone?

4 MR. APPLETON: I'm going to stand, so
10:13:38 5 they're going to deal with it however it is, okay?
6 That's just how it is, I have to stand, I have no
7 choice.

8 MS. CONOVER: Do you want the podium?

9 MR. APPLETON: No. No, I don't want the
10:13:38 10 podium.

11 MS. CONOVER: I just need to confirm that
12 they can hear you --

13 MR. APPLETON: Ok, I'll do my best. I
14 asked for a wireless mic, we could try that.

10:13:38 15 MS. CONOVER: Yes --

16 MR. APPLETON: Okay, let's do that for a
17 minute.

18 Let's proceed. I may proceed?

19 PRESIDENT: Yes. Please go ahead.

10:15:34 20 MR. APPLETON: Thank you very much,
21 Mr. President.

22 **REEXAMINATION**

23 BY MR. APPLETON:

24 Q. So, Mrs. Rondón, I'm going to ask you some
10:15:41 25 questions arising from the discussion that you had with

10:15:42 1 Mr. Molina. Okay?

2 A. Yes.

3 Q. And I'll try to be as clear as I can.

4 A. Okay.

10:15:49 5 Q. And if you're unsure we can just try to break
6 it out. We have a technical break that we have to take
7 at a certain time.

8 A. Okay.

9 Q. So it may be we do this in two phases. But I'm
10:16:01 10 hoping to get this done as quickly as I can.

11 A. Okay.

12 Q. First, I'm going to ask that you take your
13 second witness statement, CWS-08, and I'm going to see
14 if we can put it on the screen if my colleague can
10:16:14 15 project that. I'm going to ask, first of all, that we
16 look at paragraph 10 of that, especially into the second
17 page, and just to have it handy. I'm going to ask you
18 the question and then I'll ask you to look. That's
19 going to be on page 2. Don't read it yet. I'm just
10:16:33 20 going to make sure that we get you at the right spot.

21 Okay? Are you there?

22 A. I am.

23 Q. Okay. Thank you.

24 So if you recall, Mr. Molina asked you a
10:16:42 25 question, first of all, about the adoption of

10:16:47 1 statements. Do you recall that?
2 A. I do.
3 Q. Do you recall there's a statement from your
4 father?
10:16:51 5 A. Yes.
6 Q. And a statement from your mother?
7 A. Yes.
8 Q. And in paragraph 9 you talk about adopting the
9 statement of your father because he's no longer
10:17:01 10 available because he's passed away. Do you recall that?
11 A. I do.
12 Q. Then if we look at paragraph 10, we talk about
13 the situation about your mother, right?
14 A. Yes.
10:17:12 15 Q. So if we look at page 10, could you just
16 read -- sorry, paragraph 10 -- could you just read
17 paragraph 10, and then I'm going to ask you a question
18 arising specifically from Mr. Molina's. Just read it.
19 Sorry, I need you to actually read it.
10:17:34 20 A. "I also note."
21 Q. No, not out loud.
22 A. I'm sorry.
23 Q. Just read it to yourself because I have to ask
24 you a question to clarify the evidence here.
10:17:52 25 A. Okay.

10:17:54 1 Q. So if you look in paragraph 9, the last line,
2 can you read just the last line or the last -- after the
3 comma?

4 A. "I adopt them as my own."

10:18:09 5 Q. That's in relation to your father's statement?

6 A. Correct.

7 Q. So there you've expressly adopted his
8 statement, correct?

9 A. Yes.

10:18:18 10 Q. So Mr. Molina asked you if you had adopted your
11 mother's statements, and you gave testimony about that.
12 Can you show me, in light of paragraph 10, did the
13 conditions arise where you actually adopted her
14 statement?

10:18:40 15 A. Yes.

16 Q. Okay. Well, then explain to us what that
17 condition was, because she wasn't called as a witness.
18 So what's the condition, then, with your mother? Yeah,
19 explain. I know it's troubling.

10:18:56 20 A. My mother is 97. She fell and broke her left
21 arm and her left hip on Mother's Day. She's in the
22 hospital bedridden.

23 Q. But since she wasn't called as a witness, you
24 didn't actually adopt her statement formally, but you're
10:19:16 25 prepared to adopt it if need be, correct?

10:19:19

1 A. Yes.

2 Q. Just give yourself a moment. I know it's very
3 troubling. I know this has been causing concern. I
4 just need to clarify because we need to make sure that

10:19:29

5 we're very clear about what you're adopting as your
6 evidence and what you're not. Okay. I'm sorry. I'm
7 just doing these in order as Mr. Molina has gone through
8 them.

10:19:48

9 I need you now to turn to paragraph 36,
10 but you're all right?

11 A. Yeah, okay.

12 Q. Okay. If you recall, Mr. Molina asked you
13 questions about your rectification today. Do you
14 remember you clarified, you fixed -- remember you fixed
15 an error?

10:20:01

16 A. Oh, yes.

17 Q. Can we look at paragraph 36? You might want to
18 look at your clarification as well?

19 A. Did you say paragraph which one?

10:20:10

20 Q. 36.

21 A. 36.

22 Q. I know you still have a folder that has the --

23 A. Yes, I have the correction.

24 Q. All right. So just to be clear, before it said

10:20:20

25 Riverside --

10:20:20

1 A. Yes.

2 Q. -- now it says "INAGROSA and my family,"
3 correct?

4 A. Yes, uh-huh.

10:20:24

5 Q. So he asked you about really what the meaning
6 of "company's profits" were. Just I'll wait. I'll
7 wait. Tell me when you're ready. I'll wait. Okay?
8 And I'll come back. Just take your time, okay? You
9 tell me when you're ready.

10:20:44

10 A. Okay.

11 Q. Okay. So let's come back and look at this.
12 Paragraph 36, we have a correction?

13 A. Yes.

10:20:53

14 Q. The correction now says "INAGROSA and my
15 family," then the rest stays the same, right?

16 A. Yes.

17 Q. So he asked you questions about the company's
18 profits.

19 A. Yes.

10:21:01

20 Q. So since you changed the words at the
21 beginning, before it had been singular, Riverside. Now
22 it's plural?

23 A. Uh-huh.

10:21:12

24 Q. When you talked about the company's profits,
25 are you talking about the company being INAGROSA and my

10:21:17 1 family's companies, or are you talking about just
2 INAGROSA? Which are the company's profits that you're
3 talking about here?

4 A. I'm really talking about INAGROSA and my
10:21:26 5 family's companies' profits.

6 Q. Okay. So then Mr. Molina took you through a
7 series of questions about that following, and he asked
8 you about profits from INAGROSA, but he didn't ask you
9 about profits from your family's companies. I'm just
10:21:41 10 going to ask you those questions.

11 A. Okay.

12 Q. So just between 2014 and 2018, in that
13 four-year period of time, from your family's companies,
14 did they have any profits from their businesses during
10:21:57 15 that period of time?

16 A. Yes, they did.

17 Q. Okay. I'm then going to turn to issues
18 about -- questions Mr. Molina asked you about loans that
19 were made by other Riverside members. And you were
10:22:13 20 uncertain, you couldn't recall, you asked if there's
21 something we could look at as we went through it. There
22 is something in the record here that we could look at, I
23 want to bring that to your attention and see if that can
24 assist you in that. There's handwritten ledgers that
10:22:27 25 were filed. They're Exhibit C-294. I'm going to ask

10:22:32 1 that we project that, okay? And I'm going to ask
2 particularly to go to page 5, which is Bates number --
3 ends 005966 so you can see that. If we can just project
4 that. Bring it down for a minute so we can see the
10:22:50 5 page. Just minimize it.

6 This is a page from the ledger and you see
7 it says Riverside Coffee loans payable?

8 MR. APPLETON: Could you just blow it up a
9 little to make it easier?

10:23:02 10 Q. I don't know if you can see it. You're going
11 to see there are two columns here. See one column says
12 Mel Winger, and one column says Archie Nairn, and
13 there's a series of entries. Would that help refresh
14 your memory as to whether or not there were loans from
10:23:23 15 other people other than your father at Riverside?

16 A. Yes, it does. Thank you.

17 Q. You've testified already, just to be clear,
18 that Riverside had no other investment other than
19 INAGROSA. So would these moneys be investments to
10:23:39 20 INAGROSA?

21 A. Correct.

22 Q. So you can see there are totals and numbers,
23 correct?

24 A. Yes.

10:23:49 25 Q. Okay. Now I want to turn briefly to the

10:23:53 1 promissory note that was shown to you by Mr. Molina.
2 That is Exhibit C-0288, and we're going to have to look
3 at it on the screen.

4 A. Okay.

10:24:08 5 Q. So you were familiar with the note?

6 A. Yes.

7 Q. Okay. So if we could go to the third
8 paragraph, could we just go down a little bit so we can
9 see the full third paragraph? Just stop.

10:24:21 10 Can you read that, or do we need to blow
11 that up?

12 A. You need to lift it up a little bit.

13 MR. APPLETON: Do whatever she wants.

14 A. Okay. I can see it.

10:24:34 15 Q. Okay. So you see that the terms of this
16 document are expressed here, right?

17 A. Yes.

18 Q. Mr. Molina took you through the principal of
19 the loan and talked to you about something, there was
10:24:46 20 interest, right?

21 A. Yes.

22 Q. Okay. Can you just look at that third line?

23 A. Yes.

24 Q. Third sentence where it starts "INAGROSA

10:24:54 25 acknowledges" and you see it lists -- can you see that?

10:24:57 1 A. I'm sorry. On my screen, tell me again what
2 we're looking at.

3 Q. Okay. We're looking at the promissory note.

4 A. Yes, I'm looking at the promissory note.

10:25:08 5 Q. We're looking at the third paragraph. Hold on
6 a minute. I'm going to ask that we make this even
7 bigger.

8 MR. APPLETON: Can you make that a little
9 bit bigger? I don't know if I have my laser pointer

10:25:20 10 with me today. I put it aside but --

11 A. How does the paragraph begin?

12 Q. The third paragraph?

13 A. Okay.

14 Q. No, that's the fourth paragraph. There. You
10:25:33 15 see it there?

16 A. Okay. Thank you.

17 Q. I'm going to ask that you look at the part that
18 says "INAGROSA acknowledges the transfer." You see
19 that?

10:25:41 20 A. Yes.

21 Q. And you see that there are four entities that
22 are there?

23 A. Yes.

24 Q. So that's what you were referring to when we
10:25:50 25 had this promissory note?

10:25:51

1

A. Yes.

2

Q. But we know that already from the ledger there are other loans. They're not included here.

3

4

A. Yes.

10:25:58

5

Q. Can you explain if there's -- what happened with these additional loans? Do you know?

6

7

A. I don't know.

8

Q. Okay. But they're not covered by this?

9

A. No.

10:26:09

10

Q. So there could have been another document?

11

A. Yes.

12

Q. Or there could have been some other arrangement?

13

14

A. Uh-huh.

10:26:14

15

Q. You just don't know?

16

A. I don't know.

17

Q. So when you testified that this was the only -- right? Can you clarify, do you know for a fact that this is the only investment, these loans here? These are the only loan investments?

18

19

10:26:27

20

21

A. No.

22

Q. I should be able to get this cleared up before we go in.

23

24

10:26:37

25

Now, Mr. Molina asked you a question -- two things. First of all, Mr. Molina asked you about

10:26:42 1 confirmation -- decisions made by Riverside about the
2 Hass avocado project, and he made reference to a
3 resolution in 2016.

4 Were there any decisions made by Riverside
10:26:54 5 before 2016 to confirm the change of line from coffee to
6 avocados? I'm talking about corporate decisions, not a
7 resolution. Corporate decisions.

8 A. Yes, there were decisions.

9 Q. Could you describe it to the Tribunal?

10:27:17 10 A. Well, the members of Riverside were very
11 excited about Hass avocado, and they were briefed on
12 that, lots of information flowing back and forth.
13 Remember earlier I stated I was the legal
14 representative. There was a lot of excitement. All of
10:27:34 15 the members of Riverside were very successful
16 agribusiness operators and they saw the potential
17 business opportunity and they were very excited about
18 this and made a decision to support the recommendation
19 from INAGROSA that this was the direction to go.

10:27:53 20 Q. So when? The question is when did they make
21 that decision? I asked before. When did they make that
22 decision before 2016?

23 A. Well, I don't know exactly but it may have
24 something in there --

10:28:11 25 Q. No, I'm asking you a question, I don't have --

10:28:12 1 I'm just asking you a question. You said it was before.
2 When was it before? Was it --

3 A. We were talking about it starting in 2013, and
4 it was important to make a transition from coffee
10:28:24 5 because of the blight. So the decision was made early
6 on.

7 Q. Is it possible that that decision was made
8 before the last two investments were made by Riverside
9 in 2014?

10:28:37 10 A. Yes, because it was in 2013, and that is --
11 okay. These are, as I said earlier, very successful
12 agribusiness operators. They were very interested in
13 this new product line for INAGROSA. They saw the
14 potential. They were very excited. We were sharing
10:28:58 15 with them all information, lots and lots of information
16 about this.

17 Q. I'm going to ask a question. Riverside made a
18 commitment that you've talked about in your witness
19 statement of \$16 million of investment and \$1.5 million
10:29:23 20 of interest abatement, correct?

21 A. Correct.

22 Q. And when did it make that resolution, that
23 decision? Do you remember?

24 A. Yes, March of 2018.

10:29:32 25 Q. Okay. So Mr. Molina asked you about the fresh

10:29:38 1 money, the 16 million?

2 A. Yes.

3 Q. And you told him that there was no fresh money
4 that had been put in yet?

10:29:46 5 A. No.

6 Q. Okay. Why?

7 A. We weren't there yet.

8 Q. What do you mean you weren't there yet?

9 A. Well, the expansion plan would roll out, and as
10:29:55 10 the expansion plan needed the funding, then it would
11 receive the funding. That hadn't happened yet before
12 the invasion.

13 Q. With respect to the interest abatement, was
14 that interest abatement effective once they made that
10:30:15 15 resolution? They said we're going to abate \$1.5 million
16 of interest. When was that effective? Would that have
17 been in the future or was it at that time?

18 A. At that time.

19 Q. And that time was in March of 2018?

10:30:29 20 A. Yes, that's correct.

21 Q. So before the invasion --

22 A. Yes.

23 Q. -- they had put a \$1.5 million interest
24 abatement in it?

10:30:38 25 A. Yes.

10:30:39 1 Q. Would you call that an investment?

2 A. I would call that an investment.

3 MR. MOLINA: I'm so sorry, Mr. President.

4 I don't mean to interrupt. I've let it go a few times

10:30:47 5 but over the last two minutes there's been a lot of

6 leading questions and I would appreciate it if we

7 could --

8 MR. APPLETON: Mr. Molina is going to have

9 the opportunity. I'm going to finish on this.

10:30:57 10 PRESIDENT: These are leading questions,

11 as you know, Mr. Appleton, so try to rephrase them in a

12 way --

13 MR. APPLETON: If she's finished her

14 answer, I'll rephrase this one, but if she finishes her

10:31:05 15 answer, we'll turn over and I'm hoping that -- because

16 then that may give us the opportunity to be able to

17 convert the technical break to actually the next

18 witness, which is what we're actually hoping to do.

19 PRESIDENT: So where do we stand? Do you

10:31:22 20 still have many questions?

21 MR. APPLETON: No, this is my last one.

22 I'm suggesting, Mr. President, that instead of actually

23 doing the break, if Mr. Molina goes, we can see if we

24 can actually put the next witness on in that --

10:31:36 25 PRESIDENT: Okay. I understand.

10:31:38 1 MR. APPLETON: We'll get him, then we'll
2 take our break and I'll put Mr Molina on and we can use
3 that. It may take 20 minutes but we might be able to
4 get the next witness and not lose our space. So that's
10:31:47 5 what we're hoping to do.

6 PRESIDENT: We'll have a break anyway
7 after you complete with the witness.

8 MR. APPLETON: So we'll break, and I'll
9 put Mr. Molina on --

10:31:56 10 PRESIDENT: There will be no questions
11 from Mr. Molina because there is no recross examination
12 under the rules --

13 MR. APPLETON: Oh, okay.

14 PRESIDENT: -- unless a party requests and
10:32:06 15 there are exceptional reasons for it. But under the
16 rules there is no recross. So this is the end of the
17 examination of this witness.

18 MR. APPLETON: Then let me just finish
19 here.

10:32:16 20 Q. So, Mrs. Rondón, just to be clear, I just want
21 to make sure if you want to clarify now, in light of
22 what we talked about, the answer that you gave to
23 Mr. Molina.

24 Was there any -- do you want to clarify
10:32:30 25 your testimony with respect to investment that was made

10:32:32 1 by Riverside after it made its decision, its resolution
2 in 2018?

3 A. So the resolution in March of 2018 was for
4 17.5 million, 16 million in cash as needed for the
10:32:57 5 expansion plan as needed, and the 1.5 million interest
6 abatement. So we could classify that as an investment
7 because that was at the time of the resolution.

8 MR. APPLETON: Nothing further. Thank
9 you.

10:33:14 10 PRESIDENT: Thank you very much. Any
11 questions from my colleagues? No questions from my
12 colleagues. No questions from the Tribunal.

13 Thank you very much for your evidence,
14 Mrs. Rondón.

10:33:36 15 MRS. RONDÓN: Thank you.

16 PRESIDENT: And thank you for your time.
17 You are free to go.

18 A. Thank you.

19 PRESIDENT: We break now for 15 minutes.

10:33:49 20 MR. APPLETON: Mr. President, we might
21 need slightly more than 15 because of the technical
22 issues. Could we call it 20, and we'll see if we can
23 actually get the potential of putting the witness on?
24 That would also require the Republic of Nicaragua to
10:34:02 25 confirm that their observer is present.

10:34:07 1 PRESIDENT: Okay. Why don't we do the
2 following: We break at least for 15 minutes. If you
3 are not ready, and if these issues have not been sorted
4 out by the end of the break, you let us know, and we
10:34:17 5 extend the break until we have confirmed whether the
6 next witness, Mr. Ferrufino, actually will be available
7 and can be already examined now.

8 MR. APPLETON: Yes. In the alternative --
9 the problem is we don't have a lot of availability later
10:34:35 10 in the day for that hearing room, which is in a hotel.
11 So we have a slot, so we're trying to use that slot
12 period as much as we can. So I would not like to put
13 another witness on because we could lose --

14 PRESIDENT: No, there is no plan to put
10:34:51 15 any other witness.

16 MR. APPLETON: I understand.

17 PRESIDENT: We start with Mr. Ferrufino
18 once he's available. So let's break now at least for 15
19 minutes. You let us know where you stand at the end of
10:35:03 20 the break at 10:50.

21 *(Brief Recess)*

22 **MR DOMINGO FERRUFINO** (appearing by videoconference)

23 PRESIDENT: Let's resume now, and we will
24 continue with the examination of witnesses and the next
11:18:13 25 witness will be Mr. Domingo Ferrufino, who will be

11:18:20 1 examined remotely. We understand Mr. Ferrufino will be
2 testifying in Spanish.

3 MR. FERRUFINO: Yes, that's right.

4 PRESIDENT: Thank you, Mr. Ferrufino. I
11:18:39 5 see you hear us very well. Do you see us as well?

6 MR. FERRUFINO: Yes, perfectly well.

7 PRESIDENT: Excellent. So I would first
8 ask you to state your full name for the record,
9 Mr. Ferrufino, please.

11:19:06 10 MR. FERRUFINO: Yes, good morning. And
11 excuse me, my name is Domingo German Ferrufino.

12 PRESIDENT: Thank you very much. You have
13 been called as a witness of fact in this arbitration.
14 In that capacity you'll be required to tell the truth.

11:19:29 15 You should have a Spanish version of the declaration of
16 witness in front of you, so I would kindly ask you to
17 make that declaration now.

18 MR. FERRUFINO: Yes. Yes, the problem is
19 that I don't know how to read.

11:20:06 20 MR. APPLETON: Let me -- Mr. President, if
21 I may, I already alerted the secretary today to the fact
22 that Mr. Ferrufino is not able to read, so therefore, we
23 would have to have a process. She's explained to me
24 that the procedural order requirement has not been

11:20:22 25 translated yet into Spanish, so it needs to be read

11:20:25 1 through the translator, the translator will then give
2 it. I recommended they do it line by line so he can
3 repeat it, and then we can go from there.

4 PRESIDENT: Okay. Thank you,
11:20:37 5 Mr. Appleton. So I will do that. I will read the
6 declaration in English, and the interpreter will be
7 translating it into Spanish, and if you can then repeat
8 it once you get the translation. Is that understood,
9 Mr. Ferrufino?

11:20:57 10 MR. FERRUFINO: Yes, understood.

11 PRESIDENT: Very good.

12 I solemnly declare upon my honor and
13 conscience that I shall speak the truth, the whole truth
14 and nothing but the truth.

11:21:25 15 MR. FERRUFINO: That is right, sir.

16 PRESIDENT: You should repeat what the
17 translator said in Spanish, please. Do I need to repeat
18 it, or the translator, can you repeat if you have the
19 language of the declaration in front of you?

11:21:44 20 THE INTERPRETER: The interpreter will
21 repeat it, the interpreter indicates.

22 PRESIDENT: If you could repeat it now so
23 that then Mr. Ferrufino should repeat what you say after
24 you.

11:22:22 25 THE INTERPRETER: And the interpreter

11:22:23 1 confirms that that was the witness declaration.

2 PRESIDENT: Thank you very much.

3 Mr. Ferrufino, you have submitted one
4 witness statement in this proceeding dated

11:22:39 5 31st October 2023. You should have a hard copy of your
6 witness statement in front of you. Do you have it
7 there?

8 MR. FERRUFINO: Yes, where there's a
9 square or table.

11:23:03 10 PRESIDENT: You should have a hard copy of
11 your witness statement on the desk in front of you. I
12 understand counsel has made available --

13 MR. FERRUFINO: No, no.

14 MR. APPLETON: Mr. Ferrufino can't read
11:23:20 15 the witness statement, therefore we don't understand
16 what he would do with it.

17 PRESIDENT: Okay. So then that means that
18 the cross-examination has to be conducted in a way that
19 takes into account that he cannot read the witness
11:23:34 20 statement.

21 MR. APPLETON: Correct.

22 PRESIDENT: That's fine.

23 Just to explain the procedure briefly,
24 Mr. Ferrufino. There will be first questions from the
11:23:52 25 Claimant's counsel, Riverside's counsel, to you for up

11:23:57 1 to ten minutes, and then there will be a
2 cross-examination -- then there will be a
3 cross-examination by counsel for the Respondent,
4 Republic of Nicaragua, and then, if necessary, Counsel
11:24:17 5 for the Claimant will ask further questions on redirect.

6 The members of the Tribunal, the three
7 members of the Tribunal may put questions to you at any
8 time. Is this understood?

9 MR. FERRUFINO: Understood.

11:24:33 10 PRESIDENT: Very good. So the floor is
11 yours, Mr. Appleton.

12 MR. APPLETON: This actually will be
13 handled by my colleague, Ms. De Pena.

14 PRESIDENT: Very good.

11:24:55 15 MS. DE PENA: Thank you very much,
16 Mr. President.

17 PRESIDENT: Apologies, before we start the
18 secretary of the Tribunal has reminded me of the rules
19 that apply to remote examination of witnesses.

11:25:14 20 So Mr. Ferrufino, I would ask you to show,
21 if you can, with your camera the room that you are in
22 and the participants, the other individuals who are
23 attending your examination. Or maybe the technician can
24 do it for you.

11:25:42 25 MR. FERRUFINO: Technician. He says if

11:25:51 1 you can show the other persons who are here. He says
2 can you show the other persons.

3 PRESIDENT: Can you show with the camera.
4 Or maybe you can explain that in Spanish, please?

11:26:16 5 THE INTERPRETER: He wants to see who else
6 is in the room, says Mr. Ferrufino. It's okay, he says.
7 Thank you.

8 PRESIDENT: Mr. Ferrufino, I would also
9 ask you to confirm that you cannot receive any
11:26:58 10 communications from anybody else during your
11 examination, and you cannot communicate with anybody
12 else. Can you please confirm that?

13 MR. FERRUFINO: That's fine. No problem.

14 PRESIDENT: Very good. Now back to the
11:27:18 15 Claimant's counsel, please.

16 MS. DE PENA: Thank you very much,
17 Mr. President.

18 **DIRECT EXAMINATION**

19 BY MS. DE PENA:

11:27:25 20 Q. Good afternoon, Mr. Ferrufino. Can you hear me
21 clearly?

22 A. Perfectly well, ma'am.

23 Q. Very well. I understand that remembering the
24 traumatic events that you experienced could be very
11:27:41 25 anguishing. If at any time you feel overwhelmed, please

11:27:45 1 let the Tribunal know.

2 Now, Mr. Ferrufino, in your witness
3 statement you say that you've held various positions at
4 the Hacienda Santa Fé. Could you explain to us what the
11:27:56 5 three different roles were that you had at the Hacienda?

6 A. Yes, ma'am. On 14 May 2000, I came in as a
7 contractor at the Hacienda Santa Fé to clear areas for
8 growing coffee, and then planting the coffee plants.

9 Then I cleaned up the perimeter of the Hacienda
11:28:26 10 Santa Fé. I'm very familiar with these lands.

11 Then in 2013 and 2014, I cleared all the
12 areas for planting Hass avocados. Then I worked around
13 the perimeter creating the different rows. Then in 2016
14 I came into the lower part of Hacienda Santa Fé as a
11:28:56 15 security guard. That is where all the Hass avocado
16 plantation was located.

17 Q. Your witness statement mentions an invasion of
18 the upper part of the Hacienda Santa Fé on June 16,
19 2018. Could you tell us more about that?

11:29:10 20 A. Yes, on 16 June, I was working as a guard in
21 the lower part of the Hacienda, and I received a call
22 from the security guards who were in the upper part, and
23 they told me that a large group of invaders had entered
24 and had taken the lands and told them that they were
11:29:38 25 there on behalf of the Government of National

11:29:43 1 Reconciliation.

2 Q. Were you threatened?

3 A. Excuse me?

4 Q. Were you threatened at all?

11:29:52 5 A. Yes. A few days later Commander Cinco
6 Estrellas came with six other armed men in a pickup
7 truck and told me that I should let him pass through to
8 the upper part of the Hacienda, and myself and the other
9 guard, Raymundo Palacios and Danilo Gutiérrez, stopped
11:30:18 10 them. We did not let them go on any further. So there
11 I was threatened by him in very strong terms and he said
12 he was going to come back for me. And so I took this
13 very seriously because he threatened me directly and he
14 was armed with six more invaders.

11:30:41 15 Q. Your statement also talks about an invasion on
16 lower Santa Fe on 16 June 2018. Could you expand on
17 that, please?

18 A. Yes. On 16 July, I was on duty in lower
19 Santa Fe, and a group of people came in, about 60 men
11:31:10 20 strongly armed, and they said -- and they came in on
21 behalf of the National Reconciliation Government to take
22 the lands of lower Santa Fe. Then there was a gunman
23 that came in, Cristobal Luque, and he said you should
24 lay down your arms, and I said no, and then he hit me
11:31:38 25 very strongly and then he hit me with a mortar and he

11:31:41 1 hit me on the back of the head on my neck as well and I
2 had some bodily issues, injuries, and I was kicked, and
3 they continued to be kicked on the back of the head and
4 I was disarmed.

11:32:06 5 Q. Your statement says that some of the invaders
6 left Santa Fé on 11 August 2018. Could you please tell
7 us a little bit more about this?

8 A. Yes. On 11 August, I received a phone call
9 from Raymundo Palacios, the security chief, and well, we
11:32:31 10 went to the Hacienda to verify whether it was true that
11 some of the invaders that were there were leaving, and
12 so I looked to Toño Loco, who had orders from the mayor,
13 Mr. Centeno and the commissioner, Mr. Castro. Well,
14 Toño Loco was given the order to tell the invaders to
11:33:02 15 leave the Hacienda, to evict it.

16 Q. Did you have any conversations on 11 August
17 with one of the invaders? On 11 August, I'm asking.

18 A. Just one moment. I couldn't hear you very
19 well. My headset fell.

11:33:27 20 Q. Okay. I'll repeat.

21 On 11 August, did you talk to any of the
22 invaders?

23 A. Yes. One of the invaders told me that he had
24 not left still. He was there with some people, Ciro
11:33:50 25 Montenegro, Avispa. He said that he was going to leave

11:33:53 1 but in eight days' time they were going to come back.

2 Q. Your testimony also says that you went back to
3 Hacienda Santa Fé the next day on 12 August after you
4 saw some of the invaders leave on 11 August. Could you
11:34:09 5 please expand as to what happened on 11 August?

6 A. On 12 August we went to the Hacienda again on
7 orders of the security chief, Raymundo Palacios. He
8 told me that the police captain had told him that all
9 the invaders had left, but there were some that had left
11:34:38 10 in upper Santa Fé.

11 Q. I understand. Your statement also says that
12 the invaders came back in mid August 2018. Did you see
13 them come back to Santa Fé?

14 A. Yes. We were there at the Hacienda. We stayed
11:34:59 15 for a few days, and then on 17 August, about 4 p.m. in
16 the afternoon, a group of invaders came in, about 50
17 people, and they said they came on behalf of the
18 government and they were going to take the land again.
19 They entered, and we left. We saw 50 people come in,
11:35:25 20 and we didn't want to stay because that entailed danger
21 for us, and we didn't feel that our lives would be safe.

22 Q. And on 18 August, the next day, you went to
23 Santa Fé, right?

24 A. Yes, on the 18th we returned, Raymundo and I,
11:35:50 25 and we entered the Hacienda. When we entered the

11:35:56 1 Hacienda, we saw that another 100 invaders had come in,
2 and they were under Commander Cinco Estrellas and we saw
3 that the Hacienda had been fully taken by them.

4 Q. Please continue.

11:36:21 5 A. So we were there for a while, and Commander
6 Cinco Estrellas came to us and he asked us to leave the
7 Hacienda. We had nothing to do there, he said.
8 Otherwise, he was going to kill us. He didn't want any
9 witnesses to be there and see that.

11:36:46 10 Q. Do you have any corrections to your statement?

11 A. At paragraph 6, yes, 13 and 39, it says there
12 that something that I read, some document that I read to
13 Valentin López but that's not true because I can't read.

14 Q. Are you trying to say that those documents were
11:37:20 15 read to you?

16 A. They were read to me, that's correct. I don't
17 know how to read. I only heard what was read to me.

18 Q. I understand. Thank you very much,
19 Mr. Ferrufino.

11:37:36 20 MS. DE PENA: I tender the witness.

21 A. Well, ma'am, what happens is that we left some
22 parts there as well when commander --

23 PRESIDENT: Mr. Ferrufino, there are no
24 longer questions from counsel, so the direct examination
11:38:05 25 is now complete. There will be further questions by

11:38:07 1 counsel for the Respondent.

2 Thank you, Ms. De Pena. Over to the
3 Respondent.

4 MR. FERRUFINO: That's fine.

11:38:15 5 **CROSS-EXAMINATION**

6 BY MR. ZETINA:

7 Q. Good morning. My name is Fabian Zetina, and I
8 am one of the attorneys representing the Republic of
9 Nicaragua today in this arbitration. For the next few
11:38:42 10 minutes I'm going to ask you a number of questions in
11 connection with the statement that you have submitted.
12 I just want to confirm with you that you can hear me
13 well.

14 A. Please go ahead. I wasn't able to hear very
11:38:54 15 well. Can you repeat, please?

16 Q. I'm going to repeat. If at some point in time
17 you do not understand the question I'm asking you,
18 please let me know because we need your answers to be
19 taken down. Did you hear that?

11:39:18 20 A. Perfect. Yes, yes, I'm hearing you.

21 Q. In the next few minutes I'm going to ask you a
22 number of questions. I'm going to ask you to please
23 answer the question that I'm asking you.

24 A. Correct.

11:39:35 25 Q. We don't have a long time, and I wouldn't want

11:39:38 1 to have you sitting there for a long time either.

2 Mr. Ferrufino, I understand that you
3 cannot read. Is that correct?

4 A. I cannot.

11:39:51 5 Q. I'm going to be showing on the screen some
6 documents, including your witness statement, in order
7 for that to be on the record. If I ask you questions
8 about these documents, I'm going to read the document
9 out to you. Did you understand that?

11:40:11 10 A. I did.

11 Q. Mr. Ferrufino, where are you located today?

12 A. Excuse me?

13 Q. Where are you located today? Where are you
14 today?

11:40:38 15 A. Truth be told, I am sitting here on a chair,
16 and I'm looking at a computer.

17 Q. Are you in Managua?

18 A. Perfect.

19 Q. Okay. Let me ask you the question again.

11:40:53 20 Do you know whether you are in the City of
21 Managua today?

22 A. Yes, that's right. I'm in Managua.

23 Q. Do you have any documents in front of you, sir?

24 A. I do not.

11:41:16 25 Q. You have confirmed that you have submitted a

11:41:18 1 witness statement in this arbitration, correct?

2 A. I didn't hear you well. Excuse me.

3 Q. You confirmed that you've submitted a witness
4 statement in this arbitration, correct?

11:41:33 5 A. That's right.

6 Q. And you've confirmed to us that you cannot
7 read.

8 I'm going to ask you the following
9 question. How did you prepare your witness statement?

11:41:51 10 A. The only thing that I did was to say what I've
11 lived through and to talk about the beating I received,
12 the torment I went through and everything I felt and
13 everything that was done to me.

14 Q. Thank you. You cannot write either, I want to
11:42:18 15 confirm that as well?

16 A. No. I can only write one letter or two, but
17 that's all. My initials, that's what I could write.

18 Q. Can you sign, Mr. Ferrufino?

19 A. Yes. Like I said, I write out a letter as a
11:42:44 20 signature. My name. That's the only thing I know how
21 to do.

22 Q. I'm going to show on the screen the statement
23 that you submitted. Can we please put on the screen
24 CWS-12.

11:43:40 25 I understand that you cannot read,

11:43:41 1 Mr. Ferrufino, but in front of --

2 A. I can't see anything here on the screen. I
3 can't see anything of what you're talking.

4 Q. Mr. Ferrufino, on the screen, can you see a
11:44:01 5 document?

6 A. Yes, yes, I see it. It looks like letters.

7 Q. Okay, thank you.

8 Mr. Ferrufino, this is just for the
9 record. I understand that you cannot read, sir, but in
11:44:17 10 front of you, you have the statement that you submitted
11 in this arbitration. Let us look at page 17, please,
12 the last page of the pdf document.

13 Mr. Ferrufino?

14 A. Yes.

11:44:43 15 Q. You're looking at the last page of the
16 statement that you submitted in this arbitration. It's
17 on the screen.

18 A. Yes.

19 Q. I'm going to ask you a few questions about it.

11:44:54 20 A. Yes.

21 Q. Again, I understand that you cannot read, but
22 can you identify the words "Domingo Germán Ferrufino"?

23 A. What I can identify is the letter that I
24 affixed as a signature.

11:45:14 25 Q. Okay. So you see a signature in blue and you

11:45:17 1 recognize that to be your signature?

2 A. That is my letter, the letter that I use to
3 affix my signature.

4 Q. Thank you, Mr. Ferrufino. Again, let me ask
11:45:29 5 you a question.

6 A. Go ahead.

7 Q. I'm trying to understand how you prepared this
8 statement. This is a written statement, and you have
9 confirmed to us that you cannot read and that you cannot
11:45:47 10 write.

11 A. Yes.

12 Q. Could you please tell me again how is it that
13 this statement was submitted in this arbitration?

14 A. I'm going to tell you truly something. At that
11:46:11 15 time I went there and there was a lawyer and I explained
16 to the lawyer everything. It was like a report. I was
17 reporting the atrocities and the things that were done
18 to me when I was hit behind the head, on my neck. My
19 brain hurts now, and I suffered. That is what I did. I
11:46:43 20 went to a lawyer, and I explained to the lawyer the
21 atrocities that I had. I have a terrible pain in my
22 head. My back hurts. As well my body hurts. So that
23 is what I did.

24 Q. Thank you, Mr. Ferrufino.

11:47:11 25 When did you give this statement to the

11:47:15 1 lawyer?

2 A. On the 23rd, I think, or the 18th. I don't
3 remember because of all the blows I suffered. It's hard
4 for me to coordinate ideas because of all the blows I
11:47:39 5 got on my head.

6 Q. Okay, sir. So you do not remember when you
7 provided this statement before the lawyer, right?

8 A. Yes. On the 23rd I went to the lawyer and I
9 did that, I think.

11:47:58 10 Q. When you're saying on the 23rd, the 23rd of
11 what month?

12 A. I do not recall either.

13 Q. Do you remember the year?

14 A. Yeah, like I said, I think it was in 2023, I
11:48:22 15 think.

16 Q. Okay, thank you.

17 Do you know the name of the lawyer before
18 whom you submitted this statement?

19 A. I do not know. I definitely do not know who
11:48:37 20 the person is.

21 Q. How many times did you meet with this lawyer?
22 Can you tell me that?

23 A. Just the one time. Just the one time I went
24 there, and I reported the blows I got at that time.

11:48:55 25 Q. So you met with him that time, and you signed

11:48:59 1 this statement at that time, right?

2 A. Yes. Like I said, I cannot read. And he said
3 sign here. It was a woman, actually. It was a young
4 woman. And I signed. I signed what I had spoken to her
11:49:20 5 about, the atrocities I had felt because of the invaders
6 and --

7 Q. Mr. Ferrufino, excuse me. We don't have a lot
8 of time, we're short on time, so I just wanted you to
9 answer the questions that I'm asking you.

11:49:39 10 A. That's correct. Okay. That's fine.

11 Q. Sir, have you received any compensation for
12 submitting this witness statement?

13 A. No, not at all. I was only reporting what was
14 done to me. Just that.

11:50:12 15 Q. Where do you live currently, sir?

16 A. In Jinotega. I live in Jinotega.

17 Q. Thank you. Excuse me, please repeat,
18 Mr. Ferrufino. Where do you live, currently?

19 A. I live in San Rafael del Norte, the El Diamante
11:50:31 20 municipality.

21 Q. Have you always lived there?

22 A. Yes, I've lived there almost all the time. I
23 have lived and worked there.

24 Q. Do you have a passport, Mr. Ferrufino?

11:50:58 25 A. I do not. What is a passport?

11:51:03 1 Q. Let me ask you, do you understand what a
2 passport is?

3 A. I do not.

4 Q. You've never seen a passport ever?

11:51:21 5 A. To be honest, I have not seen one, no.

6 Q. And I understand that you have never seen one,
7 but do you recall whether you started the process to get
8 a passport issued to you?

9 A. When -- no, no. Look, counselor, do me a favor
11:51:59 10 and please excuse me. I think in the statement I gave
11 to the woman where I said to her that I was mistreated
12 and I was hit, I don't know if I said anything about a
13 passport because I don't understand what a passport is.

14 Q. Don't worry, Mr. Ferrufino. Let me remind you
11:52:28 15 again, I'm going to be asking you a number of questions,
16 and I'm going to please ask you to answer the questions
17 that I'm posing. Do you think that we can do that, sir?

18 A. If it is within the realm of what I stated to
19 the female lawyer, yes.

11:52:55 20 Q. Okay. One last question related to this
21 question. Do you know what a US visa is?

22 A. I do not. I have never been everywhere. I
23 have never left my country. Well, I worked in
24 Costa Rica for two years, but I worked just like that.
11:53:15 25 I didn't carry a passport. And this was back in '98.

11:53:20 1 '97 or '98.

2 Q. Let me ask you, did you drive to Costa Rica?
3 Did you get to Costa Rica by car?

4 A. Like I said, I don't really understand the
11:53:37 5 questions that you're asking.

6 Q. Well, thank you, Mr. Ferrufino. I was curious.
7 You said you never left Nicaragua except for '98 when
8 you went to Costa Rica, and the only question to you is
9 whether at that time you traveled to Costa Rica by car?

11:53:58 10 A. Well, more than anything I went on a bus to San
11 Carlos, and then from San Carlos on I was working in a
12 different place called Poco Sol.

13 Q. Thank you, Mr. Ferrufino.

14 Mr. Ferrufino, what do you do for a
11:54:16 15 living?

16 A. I was a farmer. Basic grains. I planted corn
17 and beans. But after the blows I suffered, I wasn't
18 able to work anymore. My son works, and he supports the
19 household.

11:54:38 20 Q. You don't currently work, right?

21 A. No. I can no longer work. I cannot work
22 because of the pain I feel on my neck because I was hit
23 very hard. I was hit a lot.

24 Q. When did you stop working, do you recall?

11:55:02 25 A. Well, starting in 2018, I wasn't able to work

11:55:05 1 as of 2018 to date.

2 Q. Did you go to school, Mr. Ferrufino?

3 A. No. I grew up back then. I'm 70 years old
4 almost -- I'm 69. So in the times of Somoza, well,
11:55:29 5 nobody could study if they were a poor farmer.

6 Q. Okay. Let us go back to the time when you were
7 working at the Hacienda Santa Fé. When did you start
8 working at Hacienda Santa Fé, if you can tell me that?

9 A. Well, at the beginning, I worked for the
11:55:51 10 Hacienda when it belonged to Don Tano Castellon. It was
11 a livestock Hacienda. And then Carlos Rondón Voysest
12 bought it in 1990 and then up to 1997 it went to
13 INAGROSA, and then Mr. Carlos Rondón took over and he
14 said that Santa Fé had been given to INAGROSA.

11:56:21 15 Why are you asking me that? You're asking
16 me when I started to work?

17 Q. Yes, that's right.

18 A. Is that the question you're asking me?

19 Q. Yes, Mr. Ferrufino. That's what I'm asking
11:56:31 20 you.

21 PRESIDENT: Mr. Zetina, when you ask your
22 question --

23 A. I started as a contractor.

24 PRESIDENT: For the purposes of
11:56:44 25 interpretation, don't ask your question immediately

11:56:47 1 after the -- have a short break after the answer before
2 you start your question, otherwise the interpretation is
3 getting a bit confusing.

4 MR. ZETINA: Understood, Mr. President. I
11:57:00 5 will proceed in that manner.

6 Q. Mr. Ferrufino, you said that you started
7 working for Hacienda Santa Fé in 2000, right?

8 A. 14 May 2000.

9 Q. And you said you started working there as a
11:57:25 10 contractor. Is that correct?

11 A. That is correct, as a contractor. I started
12 clearing out the coffee fields to plant coffee, and I
13 cleared the perimeter and I cleaned the whole thing and
14 I set up the fences along the perimeter of the Hacienda
11:57:50 15 and then in 2014 -- well, in 2013, I started to clear
16 out all the areas of the Hacienda in order for the
17 Hacienda to hold the Hass avocado plantation. And then
18 I started working as a security guard in the lower
19 Santa Fé where the Hass avocado plantation was.

11:58:17 20 Q. What do you mean when you say that you started
21 working as a contractor?

22 A. Back then when I worked there, I started as a
23 contractor. A contractor is a hired hand. It's not a
24 part of the payroll. You just get some money and you do
11:58:46 25 your work.

11:58:49 1 Q. I understand. So when you say that in
2 July 2016, you joined the company as a formal member,
3 this means that you were already part of the payroll,
4 right?

11:59:06 5 A. That is correct. When I joined the security
6 force group in 2016, on 16 July, I was a part of the
7 security guard group.

8 Q. And you were paid benefits, right, when you
9 were in that position?

11:59:27 10 A. Well, I was paid a salary that you earn as a
11 security guard.

12 Q. Just to understand, you said you started
13 working on 13 July 2016. That is a very specific date.
14 I just wanted to understand --

11:59:51 15 A. Excuse me, counselor --

16 Q. Excuse me, Mr. Ferrufino. You know that we
17 have simultaneous interpreters, and everything that you
18 and I are saying, that is being simultaneously
19 translated into English so that the rest of the people
12:00:08 20 here in the room can understand our exchange.

21 I'm going to please ask you to wait until
22 I finish asking my question for you to be able to answer
23 it. And I'm going to do the same thing. I'm going to
24 let you give your answer, and then I'm going to continue
12:00:26 25 asking you questions. Do you think we can do this

12:00:28

1 exercise?

2 A. That is correct.

3 Q. Thank you. I was asking you, you're saying

4 that you started to work on July 13, 2016. That is a

12:00:43

5 very specific date, and I just want to understand how is

6 it that you recall that specific date?

7 A. So I recall because, as I mentioned, I started

8 between 13th and 14th of July, I started to work

9 cleaning all of the avocado area, all of the perimeter,

12:01:17

10 wherever we have the staking and also to divide the area

11 from plant to plant.

12 Q. I apologize and I thank you for your answer.

13 Another question. Were you working with

14 Mr. Raymundo Palacios?

12:01:35

15 A. As a security guard, yes.

16 Q. And you also worked with Mr. José Francisco

17 Chavarria, correct?

18 A. That is correct. He was also part of the

19 security guard group.

12:01:52

20 Q. Mr. Ferrufino, I am going to show now some

21 documents, and I understand once again that you do not

22 know how to read, but I am going to show this for the

23 record, and I am going to explain to you the contents of

24 this document.

12:02:12

25 Could we please show Exhibit C-384,

12:02:16 1 please? I apologize. Can we please look at C-386?

2 Mr. Ferrufino --

3 A. Please, go ahead.

4 Q. This is the payroll for the period July 16th to
12:03:24 5 the 31st 2017, which has been introduced by Riverside in
6 this arbitration. And on the screen we see the list of
7 individuals that between July 16th and 31st were
8 considered part of the payroll for Hacienda Santa Fé.
9 Here we can read, and I am going to read very quickly
12:04:01 10 the individuals that we have here on the screen.

11 Nelson Enrique Perez Espinoza, Toribio
12 Herrera Mendez, Raymundo Palacios Sobalvarro, and you
13 just told me that you know him. José Efraim Jarquin
14 Sevilla, José Francisco Chavarria Zeledón, and again you
12:04:30 15 confirmed that you know him. Pablo Romero Velazquez,
16 Maximo Ramon Rizo, Karla Jasmina Picado Castro, Marta
17 Lorenza López Palacios.

18 MR. ZETINA: Can we move on to next page,
19 Ricky, please.

12:05:12 20 Q. Finally, we have Luis Adolfo Gutiérrez Cruz,
21 whom I also understand you know, Mr. Ferrufino, and we
22 also have Juan Francisco Aguilar Vanegas.

23 Mr. Ferrufino, let me reiterate that this
24 is the payroll that was introduced by Riverside in this
12:05:38 25 arbitration for the period July 16th to July 31st, 2017.

12:05:46 1 Do you know if you were working at Hacienda Santa Fé in
2 July 2017?

3 A. Yes, correct.

4 Q. Are you surprised not to be part of this
12:06:05 5 payroll that I just presented?

6 A. I don't know why my name is not there because,
7 by then, I was already part of the security guard group
8 from the 16th to the 18th. I was already part of that
9 group. I don't think I wouldn't be there on the 17th or
12:06:34 10 18th.

11 Q. Thank you, Mr. Ferrufino. We have limited
12 time, so I am not going to review all of the payrolls
13 and documents presented by Riverside in this
14 arbitration, but would you be surprised to know that you
12:06:49 15 are not mentioned in any of the payrolls between
16 July 2017 and January 31st, 2018?

17 A. I wouldn't be surprised because, let me be
18 honest, I am completely certain that by then I was
19 working at the Hacienda. I do not think that my name is
12:07:22 20 not there, it's a pity, and I am sorry I don't know how
21 to read to verify and double check.

22 Q. But you would recognize the names that I read
23 back to you from the document on the screen, correct?

24 A. Some of them, yes. Some of them. And at least
12:07:44 25 the ones from the security group that they were the ones

12:07:50 1 that -- with whom I dealt the most. Yes, I do recognize
2 those names.

3 Q. Do you know when the harvest took place?

4 A. That was in 2017 and 2018.

12:08:06 5 Q. Do you recall when it started?

6 A. So we're talking about the avocado harvest.

7 That was in November/December, I think. That is when

8 avocados were already in the trees. We only had the

9 first harvest, the first harvest in 2017, and then the

12:08:33 10 second one that was about to be obtained in 2018.

11 Q. Mr. Ferrufino, also as a security guard that as
12 you told me that you started in 2016, you handled
13 weapons, correct?

14 A. Yes. The gun that I was given at the Hacienda,
15 yes.

12:08:59

16 Q. And when you started to work as security guard,
17 did you receive any sort of training to be part of the
18 group?

19 A. To be very candid with you, no, because I was
12:09:19 20 also a member of the army between the '80s and the '90s.

21 Q. Do you recall how many people were part of that
22 security group?

23 A. Yes. There is another name, Danilo Gutiérrez
24 that was not included in the payroll list that you just
12:09:44 25 mentioned to me.

12:09:47 1 Q. So it was only you and Danilo Gutiérrez that
2 were part of this security group?

3 A. No. Raymundo was there, José Chavarria was
4 there, as well as Francisco Efrain Chavarria.

12:10:05 5 Q. Let me understand. So you only had three
6 members of the security group, correct?

7 A. Five, because I mentioned five right now.

8 MR. ZETINA: Can we go back to the witness
9 statement presented by Mr. Ferrufino that is CWS-12.

12:10:46 10 Page 5, please. 5 of the pdf. Can we zoom in
11 paragraph 11, rather.

12 Q. Mr. Ferrufino, let me read to you paragraph 11
13 of your statement and I would like to understand just
14 one thing here. Paragraph 11 reads -- and this is what
15 you told the attorney that you mentioned:

16 "On July 13, 2016, I joined the Hacienda
17 Santa Fé security team as a permanent member. The
18 permanent members of the INAGROSA security team were
19 Raymundo Palacios, Francisco Chavarria, Efrain
20 Chavarria, Danilo Gutiérrez and myself."

21 Are those the members? Are those the
22 members of the security team?

23 A. Yes, those are the five members.

24 MR. ZETINA: Now we are going to take that
12:12:25 25 from the screen, we don't need that document on the

12:12:28 1 screen anymore.

2 Q. Mr. Ferrufino, you mentioned in your statement
3 that you also know Mr. Valentin López Blandón. Is that
4 correct?

12:12:41 5 A. To be honest, I never met him but I know of him
6 when the people that were evicted in '23, they were sent
7 to San Miguelito and they were extremely disappointed
8 when they said that Mr. Valentin had promised them
9 compensation and that at the end of the day they
12:13:16 10 received nothing. So they felt that they had been
11 damaged. There was this grievance among them. But I
12 don't know. I don't know the truth of the situation
13 when Mr. Carlos was removed.

14 Q. So your only knowledge of him is because of
12:13:39 15 something that happened more than 20 years ago, correct?

16 A. Yes. I never met him physically.

17 Q. And you just told us that you did not read his
18 statement, the statements, because you don't know how to
19 read?

12:14:00 20 A. Yes, I don't know how to read. Knowing how to
21 read is one thing and a different thing is to hear or to
22 see. We're talking about different things.

23 Q. I just want to understand. In your statement
24 you mentioned that Mr. López is a person that is not
12:14:21 25 very reliable. Do I understand correctly?

12:14:25 1 A. Yes, that is what I mentioned, directly based
2 on what people said. Based on the comments of his
3 colleagues, the ones from the cooperative, when they
4 were removed. So they were removed to San Miguelito so
12:14:45 5 we heard that these people were unhappy with him because
6 they said that nothing was given to them, and
7 Mr. Carlos, because of generosity, even paid for some
8 trucks for their belongings to be moved to the San
9 Miguelito store and that was in Leon.

12:15:08 10 Q. But what you just mentioned, you are telling me
11 this just because someone else told you about it, right?

12 A. As I told you, people were unhappy, and they
13 said that they had been deceived, that he had deceived
14 them, that everything that was given to them was taken
12:15:37 15 by him. So this was the understanding.

16 Q. And in your statement you're saying that
17 Mr. López was dealing with some counterfeit titles. Is
18 that correct?

19 A. Well, they said -- that is to say the first
12:15:58 20 invaders from the old resistance -- those when they
21 were -- when there was the removal of the individuals,
22 they were no longer there. But there was just a handful
23 of individuals that had purchased lands and they were no
24 longer members of the resistance. They were just
12:16:16 25 civilians that had bought that to survive.

12:16:21 1 Q. Thank you, Mr. Ferrufino, but my question is
2 different.

3 You say that Mr. López dealt with
4 counterfeit titles. Is that what you said?

12:16:35 5 A. Yes, but as I mentioned before, this is what
6 people said, that he -- or they said that those lands
7 had been sold to them.

8 Q. So you're saying that Mr. Valentin had sold
9 those lands to them? Is that your statement?

12:16:58 10 A. Supposedly. That is what they were saying,
11 that the people that were already there were not people
12 from the resistance, but as I mentioned before, they had
13 supposedly bought the lands because when they were
14 evicted, they said that they were not with the
15 resistance but they were individuals that had bought the
16 land.

17 Q. And it was Valentin the one selling these
18 titles, correct?

19 A. Allegedly. Because as the president of the
12:17:31 20 co-op, that's the way it had to be.

21 Q. But you never saw any counterfeit title,
22 correct?

23 A. To be honest, I didn't get there because those
24 documents had to be presented at the very least to the
12:17:51 25 authority, not to myself, because -- or at the very

12:17:55 1 least to the attorneys, as the attorney Juan Carlos
2 Bonilla that was with INAGROSA.

3 Q. And you're saying that this is what you heard
4 from the people, but you do not know whether, for
12:18:11 5 example, they were lying, correct?

6 A. Well, as you said, I don't know that, indeed,
7 if someone is working with someone else and whenever
8 there is a problem it means something was done.
9 Otherwise, they wouldn't be disturbed.

12:18:32 10 Q. But you didn't have any way to verify all that?

11 A. Well, for example, when they talked about the
12 eviction, yes. Maybe I cannot confirm that, but it was
13 just what people said, that all of the goods, everything
14 that had been paid, all of the goods that had been paid
12:18:55 15 based on the improvements of the housing and everything
16 was paid, they were compensated, and this is something
17 that took place between Valentin and the lawyer. It was
18 paid to him, not to them.

19 Q. Mr. Ferrufino, you mentioned a short while ago
12:19:26 20 when the attorney asked you questions, that on July 16,
21 2018, you were in the lower end of the Hacienda,
22 correct?

23 A. Yes, correct.

24 Q. And you state that on that day invaders got to
12:19:47 25 the upper part of the Hacienda, correct?

12:19:55 1 A. I did not understand the question.

2 Q. Let me go back. On June 16, 2018 you were in
3 the lower part of the Hacienda Santa Fé. You said that
4 that was the case, correct?

12:20:13 5 A. On June 16.

6 Q. And on June 16, you're saying that invaders got
7 to the upper part of the Hacienda. Is that correct?

8 A. That is correct. I got a call by Payin. Payin
9 was the one in the upper part, Payin and Chepon, that is

12:20:34 10 Mr. Chavarria, called me and told me that a group of
11 invaders had taken the upper part of the Hacienda, and

12 since I was in the lower part, I went and asked how is
13 it that they broke in, and they told me that it was a

14 large group of people and they said that they were going

12:20:58 15 to take the lands on behalf of the administration, on
16 behalf of the national reconciliation and the

17 government. That is what Mr. Payin told me, he called

18 me. Then I went and called the chief of security, that

19 was Raymundo Palacios, and he was on leave at home. And

12:21:23 20 then I called Luis Gutierrez that was also at home but
21 he is the engineer.

22 Q. But you're telling me that that day you did not
23 see the invaders?

24 A. No, I did not see the invaders. I got a call

12:21:47 25 and I was told -- I got a threat when I didn't allow the

12:21:51 1 other person to come up to the upper part.

2 Q. So you received a threat, but at any rate, you
3 remained at the Hacienda?

4 A. I was complying with my duty and my job. You
12:22:14 5 know that poor people, farmers, need to make a living
6 and that's what we have to do.

7 Q. Mr. Ferrufino, do you have a cell phone?

8 A. Yes, I do.

9 Q. And I just want to understand. I know that you
12:22:42 10 do not know how to read, and you just told me that you
11 had called Mr. Raymundo. How did you call him? Could
12 you explain that to me?

13 A. You can have a telephone, and you can handle it
14 perfectly well when you look at it again. For example,
12:23:07 15 you ask someone and say could you please call such and
16 such a person, and that person can help you do it. We
17 were several workers at the Hacienda.

18 Q. So I want to understand. So you asked for
19 help, correct, to call the other person?

12:23:29 20 A. Yes. I asked for help to Danilo Gutiérrez.
21 That was the other person that was with me.

22 Q. Thank you. I'm asking you because this is not
23 part of your statement. I understand that you are not
24 the one who drafted directly, but that's the reason why
12:23:59 25 I'm asking you this question.

12:24:04 1 A. What do you mean that it is not in the
2 statement? When we called Raymundo and Luis?

3 Q. No. What I do not see in your statement is
4 that you asked Mr. Danilo to call Mr. Raymundo. But let
12:24:24 5 me move on to a different question, Mr. Ferrufino.

6 You say that days after that you received
7 very strong threats, but that you remained at the
8 Hacienda, correct?

9 A. Yes. When Commander Cinco Estrellas with other
12:24:45 10 three invaders came in a truck and they asked us to come
11 in, Raymundo, Danilo and myself did not want to let him
12 in. So he told me it is true that you did not allow me
13 to come in, I am going to come back. But I'll come back
14 to get you.

12:25:02 15 So in my opinion, that was a very strong
16 threat. He was armed, and clearly this was something to
17 be taken seriously. This was clearly a threat.

18 Q. And I understand that you felt threatened. Did
19 you call the police?

12:25:26 20 A. No, because the police back then -- I didn't
21 have access to calling the police because as I mentioned
22 before, if someone was close by, I could have said
23 please call the police, but if there was no one close
24 by, I couldn't call the police myself.

12:25:46 25 Q. But you just told me that you told Mr. Danilo

12:25:51 1 to call Mr. Raymundo Palacios?

2 A. No -- yes, correct, but that was when people
3 went to the upper part. But when Commander Cinco
4 Estrellas came with the invaders, with the three
12:26:12 5 invaders, that was a little bit later, like five days
6 later.

7 Q. So then on that day you were by yourself?

8 A. When? When he came?

9 Q. Exactly.

12:26:24 10 A. No, when the five invaders and Commander Cinco
11 Estrellas came, I was there with Raymundo and Danilo.
12 The three of us were there.

13 Q. So you could have asked someone to help you
14 call the police, correct?

12:26:41 15 A. But since I was with my boss, the boss was the
16 one deciding whether to call the police or not because
17 it was not my job. I couldn't go over the authority of
18 my boss.

19 Q. Did you think about asking your boss to call
12:27:02 20 the police?

21 A. No, because that was his decision. That is a
22 decision he had to make because I was not alone when I
23 was threatened. So when he told me I'll come back and
24 get you, it was not just a threat against me. It was
12:27:19 25 the threat against the three of us.

12:27:25 1 Q. And you mentioned that you remained in the post
2 in spite of the threats?

3 A. I was always there as a guard, and as I
4 mentioned, if I didn't work, I didn't eat. So that was
12:27:39 5 my work.

6 Q. Did you tell any of your relatives about this
7 great fear that you had?

8 A. No. I did it afterwards because after that
9 threat I received another one, and that is when I was
12:27:57 10 beaten up and then they attempted to kill me.

11 Otherwise, if they had hit me in the head, I would have
12 been destroyed. And after that great beating up, it was
13 then I received the direct threat on July 18th and
14 that's when I had to leave because that was too much.

12:28:21 15 That was August 18th when I was told that if I didn't
16 leave the area, they were going to kill me.

17 Q. Mr. Ferrufino, in your statement you later on
18 indicate that about 60 invaders occupied the lower part
19 of the Hacienda on July 16th?

12:28:51 20 A. Correct.

21 Q. And this is where you state that 25 invaders
22 hit you with their guns?

23 A. Yes. As I didn't surrender, they wanted to
24 take my weapons and I said that they were not going to
12:29:10 25 take my weapons because they didn't have any orders for

12:29:14 1 me to hand in my weapons. And Mr. Luque and another 25
2 invaders opened up the gates and just they threw
3 themselves on my body and they had a rocket mortar, a
4 gun, and at the end they tried to kill me. They hit me
12:29:36 5 on the head, on the back, on the ribs. They took my
6 gun, and later on they took me close to some farm
7 machinery and they started kicking me. And then they
8 took my arms and they took me in front of Commander
9 Gorgojo, who was Benicio González, and I was taken there
12:30:06 10 to be investigated and then my cell phone was taken away
11 as well as the cell phone of the workers so that we
12 wouldn't take any information.

13 Q. Thank you, Mr. Ferrufino. I think this is a
14 good time to take a brief break, or lunch if that's the
12:30:29 15 decision. I still have several more questions to ask,
16 but I see that it is 12:30.

17 PRESIDENT: Thank you. Can you estimate
18 how much you still need? Roughly.

19 MR. ZETINA: Probably another hour.

12:30:55 20 PRESIDENT: Let's break for lunch now then
21 until 1:30. It may well be that we will finish also
22 with Mr. Miller before 5, 6:00. So one question is
23 whether the parties could investigate during the break
24 whether we start with Mr. Rondón already today.

12:31:21 25 MR. APPLETON: Mr. President, so

12:31:21 1 Mr. Miller is here, I believe, and available. I just
2 need to understand. We have the room in Managua until
3 4:00 our time. So I just want to make sure that the
4 counsel believes that we'll be done by 4 p.m., correct?

12:31:42 5 MR. ZETINA: Yes, we will.

6 MR. APPLETON: So on that basis, we are
7 trying to get Mr. Rondón. He's been locked out of his
8 building, and so they're trying to get the building to
9 get opened for him. And I'll find out on the lunch
10 break where we're at with that, but at this point he has
11 basically -- he doesn't have his notes and he doesn't
12 have his clothes.

13 PRESIDENT: All I'm asking you, if parties
14 could confer during the lunch break and see whether we
15 could have -- whether it's likely that we can start with
16 Mr. Rondón already today. It looks like we'll finish by
17 4, 5:00 with the other witnesses, and that would give us
18 an hour or more potentially already with Mr. Rondón. So
19 in the interest of time, it would be good to start with
20 him if that's possible.

21 Apologies, Mr. Ferrufino. We will be
22 breaking for lunch now. It may be too early for you to
23 have a lunch, but we will have a break of one hour. So
24 I would ask you not to speak with anybody about your
25 testimony during the break. You can leave the room, you

12:32:54 1 can have a cup of coffee, and lunch, but you cannot
2 speak about your testimony during the break.

3 MR. FERRUFINO: Correct.

4 PRESIDENT: So we will come back in an
12:33:09 5 hour.

6 *(Lunch Recess)*

7 PRESIDENT: We will resume, and I will
8 give the floor back to Mr. Zetina. Please.

9 MR. ZETINA: Thank you, Mr. President.

01:40:15 10 BY MR. ZETINA:

11 Q. Mr. Ferrufino, good afternoon.

12 A. Good afternoon.

13 Q. I hope that you've been able to eat something
14 or have a cup of coffee. I am going to be putting some
01:40:28 15 other questions to you. I promise you that it won't be
16 much longer.

17 Mr. Ferrufino, before we took the break,
18 we were discussing how you had been savagely beaten on
19 the ribs and the neck. Do you remember that?

01:40:57 20 A. Yes, that's right.

21 Q. And you also recount that the invaders took
22 your telephone, correct?

23 A. That's right.

24 Q. And then you also say that they returned your
01:41:12 25 cell phone to you, correct?

01:41:14 1 A. Yes.

2 Q. And you then called the head of security,
3 correct?

4 A. Yes, Danilo and myself because I told Danilo to
01:41:28 5 take the phone and call him because he had to know what
6 was going on.

7 Q. So at that time you were just with Danilo. Is
8 that right?

9 A. Yes, it is, because the other head of security
01:41:41 10 was on leave, Raymundo Palacios.

11 Q. And I understand that that beating that you
12 suffered was very savage, and I ask you, did you have to
13 go to the hospital afterwards?

14 A. Yes, afterwards. About a week later I was at
01:42:07 15 the clinic asking them to look over me to see what I had
16 because it was my neck and my brain that were hurting
17 the most. But the cost of the medicine was too high.
18 And you know that a poor person, how are they going to
19 buy medicine? So I didn't do anything really.

01:42:29 20 Q. I understand, Mr. Ferrufino. But then I just
21 want to understand. Immediately after the beating, you
22 did not go to the hospital, correct?

23 A. Not at that moment. It wasn't until three or
24 five days later, more or less.

01:42:49 25 Q. So I understand that you decided to stay at

01:42:53 1 Hacienda Santa Fé continuing your work as a guard,
2 right?

3 A. Yes, that's right. Because -- well, you know,
4 I had to carry out my duties. As long as they told me
01:43:07 5 not to leave there, I couldn't leave there.

6 Q. And this was after 26 persons, if I understand
7 properly, beat you, correct?

8 A. That's right.

9 Q. And after you went to the clinic a week after
01:43:27 10 you were beaten by 26 persons, did they give you some
11 documentation at the clinic or some sort of
12 prescription, do you recall?

13 A. Yes, they did. They did give them to me, but
14 since I couldn't buy it, I had to throw it out. Why
01:43:49 15 didn't I want that if I wasn't going to be able to buy
16 the medicine? So it was of no use for them to have
17 prescribed it to me.

18 Q. And do you recall whether you mentioned this to
19 the lawyer who helped you draw up your statement?

01:44:03 20 A. To be honest, you told me to just tell the
21 truth, so correct, I did not mention that. Rather, what
22 I told them was about the beating I had suffered. But
23 more than anything else, I was denouncing the barbarity
24 that they had carried out with respect to my person.

01:44:31 25 Q. And then you mentioned that on 24 July, you

01:44:34 1 were at the Hacienda Santa Fé where men arrived once
2 again to the lower part, correct?

3 A. Yes, any number of men who were the ones who
4 were walking around there. It was Antonio Rizo. They
01:44:58 5 called Antonio El Loco.

6 Q. I want to understand because it seems what you
7 are recounting to me is a very difficult situation but
8 you never thought about abandoning the Hacienda
9 Santa Fé?

01:45:15 10 A. No. Remember, as I said, I had been working
11 there for 14 years. More than that -- 16, 18 years --
12 because it was from 2000 to 2018. Those are the years
13 that I had worked there. Now, as security guard the
14 first thing that he or she has to do is to figure out
01:45:33 15 how to keep the job, continue doing what you're doing
16 and really be a responsible person.

17 Q. Mr. Ferrufino, you also stated in this
18 proceeding that the invaders told you that they had been
19 sent by the government of national unity, correct?

01:45:56 20 A. Correct, because that's the first thing they
21 told me when they got to the lower part when they came
22 to take the land where I was. They told me that they
23 were there in the name of the government of
24 reconciliation to take the lands that the government had
01:46:12 25 ordered for them to have.

01:46:15 1 Q. But, Mr. Ferrufino, this is something that you
2 did not include in your original statement, correct?

3 A. For the same reason that I told you. What I
4 was doing primarily was to lodge a complaint, and since
01:46:32 5 I was terrorized from the beatings that I had had, that
6 was no small thing because psychologically it's -- where
7 I had been most affected was in the brain.

8 So well, with what kind of lawyer was I
9 speaking? Because I didn't know whether if I were to
01:46:54 10 become involved it might prejudice me afterwards.

11 Q. To which attorneys are you referring to?

12 A. Well, the one I went to when I presented the
13 accusation about the beating, the lawyer who prepared
14 the document for me when I gave the statement that I had
01:47:14 15 been beaten.

16 Q. Are you referring to the statement -- excuse
17 me, Mr. Ferrufino, let me just complete the question and
18 then I'll give you time to answer.

19 I just want to understand the time
01:47:33 20 sequence. You say that you did this before the lawyer
21 who took your statement. Now, is that the 2023
22 statement?

23 A. Yes, when I was beaten, when I went to her,
24 what I went to do was to tell her about the barbaric
01:47:56 25 treatment I had had. I had been so beaten. And that's

01:48:03 1 what I went to do more than anything else.

2 Q. And when was this exactly? Do you recall?

3 A. I don't recall.

4 Q. Could it have been a week after the beating?

01:48:23 5 A. It could have been. It could have been.

6 Q. In other words, what you're telling me about,
7 the lodging of this complaint, that is the complaint
8 that you filed in 2018, correct?

9 A. Yes. When I went to tell her about what I
01:48:41 10 had -- what they had done to me, well, I went there and
11 told her about what had happened to me, what they'd done
12 to me at the Hacienda, the times that they had
13 mistreated me, the times that they beat me, the times
14 they threatened me. I told the lawyer all of that.

01:49:07 15 Q. Mr. Ferrufino, you know that in this
16 proceeding, you have presented a statement, and you gave
17 it before a notary in August of 2018?

18 A. That's right.

19 Q. So you're referring to this statement, the
01:49:28 20 statement you presented before a notary in August of
21 2018. Is that right?

22 A. Correct, that's right. And when I went there,
23 I told her the case of everything that happened to me,
24 but I did so in a way -- well, it was quickly. I didn't
01:49:52 25 spell out so many details for her for the beating I had

01:49:58 1 had really affected my brain and when it came to
2 detailing everything.

3 Q. Thank you, Mr. Ferrufino. And who told you to
4 present this statement?

01:50:08 5 A. No, I did that on my own initiative because I
6 knew the extent to which I had been mistreated and what
7 they had done to me.

8 Q. And did you know the notary?

9 A. No. You told me to tell only the truth, and
01:50:31 10 the truth is what I'm telling you.

11 Q. Thank you. We're very grateful, Mr. Ferrufino.
12 So how did you find the notary?

13 A. Well, you know, I asked where does a lawyer
14 live, and I need to speak with him. That's the easiest
01:50:51 15 thing to do. Yes.

16 Q. Thank you. But you just told me that you asked
17 for a lawyer, asked about a lawyer. Do you remember
18 who?

19 A. No. A person, you know -- you ask anyone on
01:51:09 20 the street where is a lawyer's office, where might there
21 be a lawyer's office where I could find a lawyer to
22 speak with.

23 MR. ZETINA: Okay. Now I'm going to ask
24 if we could put up on the screen the contemporaneous
01:51:27 25 statement of August 2018. And for the record, this is

01:51:31 1 Exhibit C-211 and so that the Tribunal can follow the
2 translation into English, it's R-151. I just want to
3 note for the record that there is a section R, and this
4 is an annex that was submitted only in Spanish by the
01:52:05 5 Claimant, and Nicaragua filed the statement and the
6 translation into English. Could we show C-211, please?

7 Q. Mr. Ferrufino, up on the screen you'll see -- I
8 know that you can't read. You will see here a document
9 that has the following description. It says "Notarial
01:52:45 10 Document for Usurpation of Private Property."

11 MR. APPLETON: Excuse me. There's no
12 document. We don't know what you're referring to.

13 MR. ZETINA: Excuse me. There's a delay
14 between the original and the translation. I understand
01:53:04 15 that you can now see it up on the screen.

16 Q. Mr. Ferrufino, do you see a document on the
17 screen?

18 A. A table, in the form of a table with some
19 images that look like coins. Like a seal.

01:53:18 20 Q. Thank you, Mr. Ferrufino.

21 And I was saying that this is a notarial
22 statement that the Respondent has filed where you,
23 Mr. Ferrufino -- or the Claimant, rather, where you,
24 Mr. Ferrufino, go before a notary to make a statement, a
01:53:43 25 notarial statement. And this notarial statement is

01:53:48 1 dated 19 August 2018.

2 I understand, Mr. Ferrufino, that this is
3 the statement that you were referring to in our
4 conversation of just a few moments ago, correct?

01:54:08 5 I'm not asking you to recognize the
6 document. I understand you don't know how to read, but
7 I am showing you the document just to ask you whether
8 the notarial statement of 18 August 2018 is the one
9 we're referring to just a few moments ago, correct?

01:54:25 10 MR. APPLETON: I'm sorry, Mr. President.
11 We have to object again. The witness has testified that
12 he sees a document that has coins on it and symbols.
13 How is he supposed to testify on anything else?

14 Counsel is asking him to do something he
01:54:40 15 has said he can't do. I don't understand. If he would
16 like to read this to him, he can do that, but I don't
17 understand what otherwise we're doing, and I don't want
18 us to go in the wrong spot, but the witness has said I
19 don't otherwise know what this is. He's identified the
01:54:58 20 images, the graphic images on it. What is the
21 purpose -- what are we doing?

22 PRESIDENT: Let's see where this goes.
23 I'm not sure whether the witness has actually signed
24 this document.

01:55:11 25 MR. ZETINA: Yes. We can go there,

01:55:14 1 Mr. President and I can just rephrase my questions. I
2 just want to note that I'm also showing his witness
3 statement, that he apparently cannot recognize either
4 because he cannot read. So it would be a similar
01:55:30 5 exercise that I would be doing here.

6 PRESIDENT: You can show the document, but
7 then you have to be careful about how you phrase the
8 question.

9 MR. ZETINA: I will, Mr. President.

01:55:43 10 Q. Mr. Ferrufino, I'm going to go back just a
11 minute.

12 A few minutes ago we were talking about a
13 statement that you told me that in August of 2018 you
14 had made before a notary who was recommended to you by a
01:56:11 15 person who you encountered on the street at that time.
16 Is that correct? Do you remember that we discussed this
17 a few minutes ago?

18 A. Yes.

19 Q. So the only thing -- I'm not asking you to
01:56:26 20 recognize this document because I understand that you do
21 not know how to read -- the only thing I wish to
22 establish for the record is that up on the screen we
23 have a statement made before a notary on 19 August 2018
24 where a notary public establishes that Mr. Ferrufino is
01:56:55 25 presenting an account of facts on that date.

01:56:59 1 I'm not asking you, Mr. Ferrufino, to
2 recognize this because you don't know how to read or
3 write. I'm simply stating that apparently this is the
4 document that he's referring to, and for the record, if
01:57:21 5 we could turn to the next page so that the whole
6 document can be seen -- next page, please.

7 This is the complete document. It is
8 signed, and it says Ms. Yessenia Elizabeth Sanchez and
9 the second last name is there, it says Sanchez
01:57:59 10 Baltodano, attorney and notary public, and we can see --
11 well, I'm going to read some lines just for the record.

12 On the left side we can see it says "in
13 the City of Jinotega, department of Jinotega at 11 a.m.
14 of Sunday, 19 August 2018, before me, Yessenia Sanchez,
01:58:39 15 attorney and notary public," and following is her ID
16 card as well as the information from her ID from the
17 Supreme Court of Justice. If we can go down a little
18 further. There.

19 At line 13 we can see that it says that
01:59:03 20 "Comes before me, Mr. Domingo German Ferrufino," and
21 then a few lines further, at line 20, it says "imposed
22 on his rights legally grants a first notarial statement
23 for usurpation of private property."

24 Mr. Ferrufino, did you hear what I just
01:59:35 25 read?

01:59:39

1 A. Yes.

2 Q. Do you recall having given this statement?

3 A. Well, as I was saying when I was there -- or if
4 you could read it to me once again.

02:00:01

5 Q. I'm going to read the date once again. If we
6 could bring it up a little bit, please.7 This is a notarized recorded instrument, a
8 deed, and it says here "in the City of Jinotega,
9 department of Jinotega at 11 a.m. of Sunday, August 19,
02:00:31 10 2018, before me, the notary," and then it says that this
11 is a statement before a notary that you have submitted
12 on trespassing. It is a statement on trespassing. Do
13 you remember having given this testimony or rather this
14 statement, Mr. Ferrufino?

02:01:02

15 A. Look, like I said, when I went there, I went
16 there to talk about the mistreatment that I had suffered
17 over there, and when you're talking about trespassing, I
18 don't really understand what you mean. I don't know
19 what that means really.

02:01:27

20 Q. Mr. Ferrufino, again, you told me that you went
21 to a notary to make a report or make a statement, and
22 you found this notary upon recommendation by someone you
23 found on the street.

24 Let me ask you then. Do you recall

02:01:49

25 whether that statement was given to you and then you

02:01:54 1 just signed it?

2 A. Well, but where is my letter, the letter I use
3 to affix my signature? I don't see it there. You
4 showed me the letter I used to affix my signature
02:02:18 5 before, and I can tell you that that was my signature.

6 Q. Thank you, Mr. Ferrufino. I'm going to read
7 what this document says. On the right, at line 8 --
8 well, perhaps we can go up a little bit.

9 At line 5, the notary is saying the
02:02:45 10 following:

11 "I have read this public instrument to the
12 appearing party, and the appearing party has found that
13 this is in conformity, it is approved, it is ratified
14 and it is signed before me. I witnessed that."

02:03:12 15 And then it says here illegible signature,
16 I think that's what it means, Domingo German Ferrufino.

17 So the document does not bear your
18 signature here. The only thing that the notary is
19 saying is that you were read this statement, that you
02:03:33 20 agreed with the statement, that you approved it, that
21 you ratified it, and that you signed it before the
22 notary. And this document says that this is a copy of
23 the original.

24 My understanding is that your original
02:04:05 25 signature would appear only on the original document of

02:04:11 1 this notarized recorded instrument, this deed, prepared
2 by the notary.

3 Now, after having told you all this, do
4 you remember having submitted this statement?

02:04:27 5 A. Again, like I said, I went there and I did
6 everything very fast and I went there and I explained to
7 them how I had been threatened, how I had been
8 mistreated, the effects that all this had caused on me.

9 Physically, I was tortured quite a bit, and my head
02:05:01 10 really it wasn't working right because of the beatings
11 that I sustained, specifically in the back of the head
12 and on the back, and my back.

13 Like I said, perhaps that's the reason why
14 I forget some of the things and I can't remember things
02:05:20 15 clearly, normally. You're talking about 2018. Four or
16 five years have elapsed, right?

17 Q. I understand, Mr. Ferrufino. Like you said,
18 about five years have elapsed. I'm just trying to
19 understand.

02:05:56 20 The witness statement that Claimant
21 submitted is very detailed. It has a lot of dates on
22 it. Reference is made to many places, reference is made
23 to many individuals. It also makes reference to
24 weapons, to a number of people that were, according to
02:06:13 25 you, at Hacienda Santa Fé. And I'm now asking you a

02:06:21 1 question about something that also happened around that
2 time, and you do not recall, you say?

3 A. Yes, what I remember is that when I went to
4 give the statement to the notary, I said legitimately --
02:06:42 5 well, again, as I told you before, I went there to tell
6 her what was done to me, how I had been treated. I had
7 been mistreated, definitely, and things are very
8 serious. It is hard for me to think about things
9 properly or to remember things properly, this because of
02:07:00 10 the beating. The brain suffers. I feel that I took a
11 beating and my head hurts a lot and my neck hurts a lot
12 as well.

13 Q. I understand, Mr. Ferrufino. I would like to
14 move on. I'm going to ask you about what happened in
02:07:22 15 August 2018.

16 You state that, on 11 August 2018, Mayor
17 Centeno gave orders for the eviction of Hacienda
18 Santa Fé, correct?

19 A. Yes. When I saw Toño Loco and he came in, I
02:07:45 20 saw that he gave the orders to the invaders that they
21 had to leave the Hacienda. They had to evict the
22 Hacienda. Leonidas Centeno and Commissioner Marvin
23 Castro ordered the invaders to leave the Hacienda.

24 Q. Thank you, Mr. Ferrufino. Commissioner Marvin
02:08:17 25 Castro, as you understand it, well, he's a member of the

02:08:21 1 police, right?

2 A. Yes, yes, of course. That's correct.

3 Q. On 11 August 2018, a member of the police gave
4 orders to the invaders to leave. Is that correct?

02:08:38 5 A. No. Supposedly the order was given to Toño
6 Loco because Toño Loco was a civilian, and he had an
7 AK-47 on him. I don't know how that goes, but they were
8 the ones that gave the orders because later that day
9 everybody left, all the invaders left in an orderly
02:09:04 10 manner and they left the Hacienda. Yeah, you told me to
11 answer the questions you pose to me so...

12 Q. Thank you, Mr. Ferrufino. You then say -- and
13 you just confirmed this to me -- that Mr. Marvin Castro
14 was a member of the police and in such capacity he
02:09:48 15 ordered the invaders to leave. You also stated that the
16 invaders left, and nobody from the government formally
17 handed over the possession of Hacienda Santa Fé. Is
18 that correct?

19 A. That is correct, counselor. That is correct
02:10:09 20 because, sincerely speaking, we were there, and we saw
21 how on 12 August, nobody was there and people from the
22 prosecutor's office weren't there. The police was not
23 there. The Hacienda had been left empty.

24 Q. You know that Mr. Gutiérrez was also at
02:10:35 25 Hacienda Santa Fé, correct?

02:10:36 1 A. On 14 August, yes.

2 Q. Do you know whether Mr. Jaime Vivas was there
3 as well?

4 A. That is correct. He was there as well.

02:10:50 5 Q. And Mr. Raymundo Palacios?

6 A. He was there as well.

7 Q. Do you know whether Mr. Gutiérrez has submitted
8 a statement in these proceedings?

9 A. Counselor, I do not know about that. I have no
02:11:14 10 personal knowledge of it.

11 Q. I'm going to show on the screen this statement
12 for the record. Again, sir, I know you don't know how
13 to read. CWS-02.

14 MR. ZETINA: Can we show on the screen,
02:12:16 15 please, paragraph 106? I'm going to tell you the page
16 number in a moment.

17 MR. APPLETON: What's the purpose of
18 telling the witness the page number since he can't read
19 it? Is it a picture you're going to show him, or is it
02:12:37 20 something that you want to read?

21 MR. ZETINA: I'm getting there.

22 MR. APPLETON: Perhaps you might assist us
23 so we know it's appropriate.

24 PRESIDENT: He can read to the witness
02:12:46 25 from the witness statement.

02:12:48 1 MR. APPLETON: We don't object.

2 PRESIDENT: You can do that without
3 showing the document.

4 MR. ZETINA: I'll do that, Mr. President.

02:13:00 5 Q. Will you be surprised, Mr. Ferrufino, if I told
6 you that Mr. Gutiérrez stated in these proceedings that
7 after 11 August 2018, the invaders left, as we
8 discussed. Mr. Gutiérrez indicated and acknowledged
9 that Hacienda Santa Fé was ready for them to come back?

02:13:44 10 A. Who? Who was going to come back?

11 Q. That the owners and the representatives of
12 INAGROSA could go back and recover the property.

13 A. Gutiérrez stated on 11 August the owners could
14 receive the Hacienda back?

02:14:06 15 Q. Yes, exactly.

16 A. I'm sorry, Counselor, I don't really understand
17 anything you're saying. I'm going to say something I
18 said before. Again, you told me to speak the truth and
19 only the truth. I don't really understand how is it
02:14:19 20 that Luis Gutierrez can provide a statement such as
21 that. That is ironic. It is an untruth.

22 Excuse me. You know that I'm a farmer. I
23 don't know how to read. Perhaps I am ignorant, but I
24 don't really understand any of this.

02:14:44 25 MR. APPLETON: Pause for a second. That's

02:14:46 1 not what the statement says, so we need to make sure
2 because the witness can't read it, that we're being as
3 accurate and as careful as possible. We have to take
4 special precautions because we're reflecting something
02:14:57 5 and telling information to the witness that may be
6 incomplete here.

7 PRESIDENT: That objection is
8 well-founded. If you want to put a question on what
9 another witness says, you have to read verbatim what the
02:15:12 10 witness says in his witness statement and then ask the
11 witness to comment. If you paraphrase it, then there's
12 a risk that it becomes a different statement.

13 So if you want to pursue this line of
14 questioning, that's the way you should proceed.

02:15:28 15 MR. ZETINA: Understood, Mr. President.
16 I'll move on to another topic.

17 Q. Mr. Ferrufino --

18 A. Yes.

19 Q. Do you recall that before we took the break, I
02:16:08 20 asked you a few questions in connection with your
21 passport? Do you remember that?

22 A. Yes.

23 Q. Let me ask you again, because your answer
24 wasn't really clear to me.

02:16:31 25 Do you currently hold a passport?

02:16:37 1 A. I told you already, passport? What's that? I
2 don't really understand.

3 Q. You understand that in this arbitration, sir,
4 you were supposed to come and provide testimony in
02:17:04 5 person here in the United States?

6 A. I do not know about that. I don't know.

7 Q. Your lawyers didn't tell you that the testimony
8 you're providing today, that testimony should have been
9 given in person in the US? Is that correct?

02:17:40 10 A. Really, I don't know whether that's correct or
11 incorrect. Again, like I said, first, I don't know how
12 to read. I don't know how to answer your question. You
13 know that not everyone is granted a visa. I don't think
14 that a person such as me is going to be able to get a
02:18:03 15 visa to travel to the US. More so if nobody asks for
16 it. I have family members in the US, but you know that
17 if a family member requests it, then you can go to the
18 States? No, that's not right. And you're going to get
19 a visa just like that? No, you're not going to get a
02:18:30 20 visa just like that.

21 Q. Okay. Now you're talking about a visa.

22 A. Yes, sir.

23 Q. Do you know that in order to obtain a visa --
24 okay. Let's see. Let me rephrase my question.

02:18:47 25 I asked you about a passport. You told me

02:18:50 1 that you do not know what a passport is. Let me explain
2 to you what a passport is. A passport is a document
3 issued by the government of Nicaragua to you for you to
4 be able to travel outside of Nicaragua. Do you
02:19:11 5 understand what I'm referring to now?

6 A. No, I didn't know that. I didn't know that
7 that was how things were.

8 Q. You mentioned a visa to me a moment ago.

9 A. Yes.

02:19:29 10 Q. Have you submitted recently an application to
11 obtain a visa to travel to the US?

12 A. Yes, well, truth be told, for that -- and I've
13 been told -- well, the family members that I have over
14 there have told me that for that, somebody has to ask
02:19:54 15 that from over there for you to be able to request a
16 visa or something like that to travel. There has to be
17 somebody that requests the visa. And I talked to some
18 nephews that I have over there. That's what they told
19 me.

02:20:11 20 Q. So recently you did not make that application?

21 A. The proceedings with the visa, no, because
22 again, like I said, somebody has to ask that for you.
23 If you don't have somebody requesting it for you, you
24 can't get anywhere. That's what I understand. I am a
02:20:35 25 farmer. I don't really understand anything. But that's

02:20:38

1 what I think.

2 Q. Have you ever been to the US embassy,

3 Mr. Ferrufino?

4 A. When I was in the army almost every day I went

02:20:55

5 by it.

6 Q. But have you had an interview in order to

7 obtain a visa?

8 A. Right this moment, no, I haven't gone. That's

9 the truth.

02:21:20

10 Q. What about at some other point in your life?

11 A. No.

12 Q. So the US government has never rejected your

13 application for a visa. Is that correct?

14 A. I don't know what you're referring to.

02:21:53

15 Sometime I don't really understand things. A farmer is

16 a farmer.

17 Q. Thank you, Mr. Ferrufino. Again, I would like

18 to move on. The issue about your passport and visa is

19 clear to me now and I would like to talk about your

02:22:24

20 witness statement a little bit.

21 We have said that you do not know how to

22 read or write. You submitted, however, a witness

23 statement in this arbitration that you have signed so

24 I'm going to ask you some other questions as to how this

02:22:42

25 document was submitted in this arbitration.

02:22:50 1 You mentioned that you met with a lawyer,
2 a woman who was a lawyer, in order to prepare this
3 witness statement. Do you remember that?

4 A. Yes. The lady lawyer that I told you about,
02:23:06 5 when I went there and I reported the beating that I had
6 taken more than anything else.

7 Q. Do you remember if this lawyer was the same
8 lawyer that introduced you this morning?

9 A. No. No, it's not the same person. I do not
02:23:29 10 recall. She was older, I think, but I don't recall.

11 Q. Just to confirm, sir, the questions I am asking
12 you now have to do with the witness statement that you
13 prepared in 2023 to be submitted in this arbitration
14 related to the testimony that you are giving today.

02:24:02 15 A. Well, the woman that you told me about -- well,
16 the woman that I went to give my statement to is not the
17 one that you presented to me.

18 Q. You said before that you held a meeting with
19 this lawyer, and you told the lawyer about the events
02:24:28 20 that we have been discussing around Hacienda Santa Fé,
21 and I'm going to ask you a few questions about that.

22 How many times did you meet with the
23 lawyer to prepare your testimony?

24 A. What lawyer are you referring to?

02:24:48 25 Q. Okay. Let's go back. You submitted in 2023 a

02:24:53 1 witness statement. You said that a moment ago. Is that
2 correct?

3 A. Uh-huh.

4 Q. Do you recall that statement? This is the
02:25:05 5 statement that we are discussing today.

6 A. Well, no, that's what I was trying to tell you
7 when I told you that I was going to speak the truth, and
8 I told you that I did not recall. That is what I told
9 you. I do not recall if that had been in 2023 or

02:25:27 10 17 August 2018. That's what I told you, I didn't
11 recall.

12 Q. I understand, Mr. Ferrufino.

13 You remember, sir, that this morning a
14 lawyer asked you if you had any clarifications you
02:25:44 15 wanted to make of your witness statement. Do you
16 remember that?

17 A. She didn't ask me that. Sincerely speaking,
18 she didn't ask me that. She didn't ask me that this
19 morning, nor did she ask that of me today.

02:26:07 20 Q. Sir, do you recall that this morning, you
21 presented a number of corrections to your witness
22 statement saying that you had never read the statements
23 of Mr. Valentin López because you cannot read? Do you
24 remember that?

02:26:26 25 A. I told you that when you were talking about the

02:26:32 1 invasions and other matters. I said no, I could not
2 read. And we said this at the very beginning. I said
3 this from the very beginning that I do not know how to
4 read. That's when I told you that.

02:26:58 5 Q. I'm just trying to have you and I on the same
6 page. I know it's been a long day, and my apologies for
7 that. We're going to end soon, so I'm going to ask you
8 to bear with me for a few more minutes.

9 Do you need a glass of water,
02:27:21 10 Mr. Ferrufino? Do you have that?

11 A. No. The thing is that the back of my neck,
12 there's a pain here that's killing me.

13 Q. We're about to finish, sir.

14 Mr. Ferrufino, you submitted two
02:27:38 15 statements related to Hacienda Santa Fé, correct?

16 A. To be honest and clear, it's one. What we are
17 doing is we are expanding on what happened when I took
18 the beating. I think that's what I think, unless I'm
19 mistaken.

02:28:22 20 MR. ZETINA: Mr. President, I don't have
21 further questions. Mr. Ferrufino, I don't have any
22 other questions for you. Thank you very much.

23 MR. FERRUFINO: Thank you very much, sir.

24 PRESIDENT: Thank you. There will be
02:28:39 25 potentially further questions from the counsel of the

02:28:44 1 Claimant. Mr. Ferrufino, would you like to have a brief
2 break of five minutes?

3 Do you hear me? Is the interpretation
4 working?

02:29:08 5 MR. APPLETON: I don't think he hears you.

6 PRESIDENT: Mr. Ferrufino, do you hear me?

7 THE INTERPRETER: Mr. President, this is
8 the interpreter. Maybe during the break they disabled
9 the translation on Zoom in Nicaragua.

02:29:27 10 MR. APPLETON: Perhaps we should take a
11 break and we can ask the witness in Spanish if he would
12 like to eat something. I think he hasn't eaten because
13 it's lunch time.

14 PRESIDENT: That is a good idea. He is in
02:29:40 15 pain anyway. Let's break for ten minutes now, and in
16 the meantime if you could tell him to be available and
17 then we'll have the redirect thereafter.

18 MR. APPLETON: Can we do that perhaps in
19 Spanish so he might hear that now?

02:29:56 20 THE INTERPRETER: Mr. President, he cannot
21 hear the Spanish.

22 MR. APPLETON: He can't hear the Spanish
23 either.

24 THE INTERPRETER: He cannot hear the
02:30:06 25 Spanish. Somebody has to tell him in Spanish.

02:30:07 1 MR. APPLETON: We'll have Ms. De Pena do
2 it. She can tell him he can have a ten-minute break and
3 perhaps eat something if he needs it and then come back
4 and see if his neck is all right.

02:30:28 5 MS. DE PENA: Mr. Ferrufino, we're going
6 to take a ten-minute break. I know that you're in pain
7 right now. You can go and have something to eat if you
8 want. Your neck hurts, we know that, but please stay
9 with us. And thank you so much for the time that you
02:30:42 10 have given to us.

11 MR. FERRUFINO: Yes, Counselor, of course.
12 I have a big pain in the neck.

13 MS. CONOVER: Can you hear me? Yes. So
14 we are now going to have about a ten-minute break.

02:31:10 15 *(Brief recess)*

16 PRESIDENT: Okay. Mr. Ferrufino, do you
17 hear us?

18 MR. FERRUFINO: Perfectly well.

19 PRESIDENT: Excellent. So there will
02:51:54 20 still be a few questions from counsel for the Claimant.
21 So it will be Ms. De Pena, I understand. Please go on.

22 MR. APPLETON: I'm afraid that we have a
23 procedural matter to deal with first before we start
24 that.

02:52:10 25 So the purpose of the observer is to

02:52:13 1 observe, especially to ensure that there are no notes or
2 other things that are passed along to the witness, which
3 of course is not the issue in this situation because
4 there are no notes whatsoever.

02:52:27 5 I've noticed while this is going on that
6 the observer is getting very close, getting behind and
7 moving around in the room. It's already a tight room,
8 as we've seen. I'm going to ask that the observer stay
9 in place. They should be able to observe, but they
02:52:42 10 shouldn't be doing anything that's menacing or close or
11 any of those things. That's not the purpose. And we've
12 already expressed our concerns in general.

13 So we don't see any reason why that
14 someone should be coming close to the witness while this
02:52:59 15 is going on, and unless there is some reason, an
16 objective reason, I'd like to have that person just stay
17 seated and in place.

18 PRESIDENT: That is noted, and I was going
19 to raise that with counsel. After we conclude the
02:53:15 20 examination of Mr. Ferrufino, you should instruct the
21 representatives to sit down and not interfere, not walk
22 around. They should sit down during the examination,
23 just observe, no interference with the examination.
24 That is understood and noted.

02:53:30 25 MR. APPLETON: So can we instruct this

02:53:32 1 observer now to stay in place, because that's -- I'm
2 worried about this now. That's what I'm worried about.
3 This observer is actually doing things, as you've
4 noticed, and we've noticed. And as I think it's going
02:53:44 5 to become evident in a few minutes.

6 PRESIDENT: The question is how do we
7 communicate with the representative?

8 MR. APPLETON: We can ask to speak to the
9 technician, and he can pass that along in Spanish. So
02:53:56 10 just say "please stay seated."

11 MS. GONZÁLEZ: Mr. President, if I may
12 interrupt. We understand that the coffee table in that
13 room is behind the witness. We understand and
14 apologize. If he stood up, it was to get coffee. As
02:54:12 15 you can see, there is the jar of coffee right there. We
16 have already told him please do not get coffee while
17 this is going on. Thank you.

18 PRESIDENT: Very good. The problem has
19 been taken care of.

02:54:24 20 MS. GONZÁLEZ: Thank you.

21 PRESIDENT: Ms. De Pena.

22 MS. DE PENA: Thank you very much,
23 Mr. President.

24
25

02:54:30

1

REDIRECT EXAMINATION

2

BY MS. DE PENA:

3

Q. Good afternoon, Mr. Ferrufino. Can you hear me
4 okay?

02:54:35

5

A. A little bit. It's not very clear.

6

Q. Can you hear me better now?

7

A. Yes.

8

Q. Mr. Ferrufino, are you feeling okay to
9 continue?

02:54:49

10

A. Yes, indeed. At any rate we have to do it,
11 madam.

11

12

Q. Thank you very much for your effort.

13

Mr. Ferrufino, you would recall that in
14 the cross-examination you were asked how you developed
15 this statement, CWS-12, that was presented on
16 October 31, 2023. Do you recall you were asked about
17 that?

02:55:07

15

16

17

18

A. Yes, I was asked, and I was told, or I was
19 asked how is it that I did it and I explained that what
20 I did was to clarify the situation of the great beating
21 that I received and that I told them that I had made it
22 as short as possible because I didn't know who I was
23 addressing. And I also said that I was really afraid
24 because of the beating and also the mistreatment that I
25 received morally and physically and also the beating

02:55:32

20

21

22

23

24

02:56:02

25

02:56:05 1 that I got in my brain, that I was not feeling well
2 because of the severity of that.

3 Q. Mr. Ferrufino, I am referring to the statement
4 that you submitted last year, in 2023, that was
02:56:21 5 submitted before this Tribunal.

6 A. Yes. Could you please repeat the question?

7 Q. I am referring to the witness statement that
8 was presented before this Tribunal, CWS-12 of 2023.

9 A. Yes. I offered my statement. Honestly, I do
02:56:56 10 not recall because you would know that because of the
11 beating and -- I don't recall what happened in 2023.

12 Q. Mr. Ferrufino, I would like to show you the
13 first page of your statement, CWS-12, that I am
14 referring to. This is the statement that was submitted
02:57:54 15 before the Tribunal dated October 31, 2023. This is
16 CWS-12. We are now going to go to page 17. The last
17 page, please.

18 Mr. Ferrufino, is this your signature?

19 A. That is my signature. That is my handwriting.

02:58:47 20 Q. Thank you. Very well.

21 Do you recall having had a conversation
22 and relaying -- no, rather let me restate my question.

23 You know how to state the truth, right?

24 A. I'm sorry. I don't think I can hear you very
02:59:22 25 well.

02:59:23 1 Q. You know how to state the truth, correct?

2 A. Correct.

3 Q. Have you stated the truth correct today?

4 A. Only the truth.

02:59:33 5 Q. Do you recall that I am the attorney that
6 helped you make this statement and that you had a very
7 high number of interviews with me and during those
8 interviews you told me, or you relayed to me, you
9 narrated to me a series of events and situations? Is
02:59:55 10 that correct?

11 A. Yes. The person that was with me in Jinotega
12 is the one that I told the attorney I didn't recall. I
13 didn't know who she was. I didn't recall her.

14 Q. I am referring to the 2023 statement, the one
03:00:14 15 that I showed you, where in the last page we can see
16 your signature.

17 A. Yes.

18 Q. Do you recognize or do acknowledge that you
19 talked to me and that we had a series of interviews?

03:00:32 20 MR. ZETINA: I'm sorry, I need to object,
21 Mr. President. That's a clear leading question. She
22 just did one before, and I let it pass.

23 PRESIDENT: That is a leading question, so
24 please rephrase.

03:00:58 25 MR. MULLINS: If I may, Mr. President,

03:01:01 1 obviously the witness is very elderly and I take it that
2 there's a man going back and forth. I get he's not
3 going to get coffee anymore. But I do think it's shown
4 he's been confused about a couple things in his
03:01:14 5 statement. He's not literate. I think on this point if
6 we could just have some leeway to help him go because I
7 think he is confused and I think the Tribunal will be
8 helped by having the record clarified because he clearly
9 is confused on this one point.

03:01:30 10 PRESIDENT: Yeah, we have seen that. It's
11 a question of how the questions are phrased. I'm not
12 sure whether the witness can see you, Ms. De Pena, so
13 it's difficult for him if he doesn't see you to confirm
14 that you are the person.

03:01:48 15 MR. MULLINS: Is there a way we can get
16 her on the screen?

17 MR. APPLETON: Mr. President, I clarified
18 this morning with the technical team that they change
19 the angle of the cameras based on who's speaking and I
03:01:58 20 asked them specifically to confirm that they would be
21 able to have the witness in Nicaragua see Ms. De Pena.
22 They confirmed that for me directly this morning. So I
23 would believe what they've told me is correct, and that
24 the witness was able to do this.

03:02:14 25 PRESIDENT: Let's ask the witness to

03:02:17 1 confirm. You can put these questions to him. You have
2 some leeway. We see he is confused about these
3 questions obviously because we are asking and counsel is
4 asking questions about documents that he's not able to
03:02:32 5 read. So it's easy to get confused. So you will have
6 some leeway, but use it sparingly.

7 MS. DE PENA: Thank you, Mr. President.

8 MR. APPLETON: Go slow to make it easier.

9 Q. Mr. Ferrufino, can you hear me? Mr. Ferrufino,
03:03:00 10 can you hear me?

11 A. Yes, I hear you, ma'am. Now I can.

12 Q. Can you see me on the screen?

13 A. Yes. Go ahead. Hello?

14 Q. Mr. Ferrufino, do you recall having had a
03:03:25 15 number of interviews, conversations with me relating to
16 the events that took place at the Hacienda Santa Fé?

17 A. That's right, ma'am.

18 Q. Okay. Do you recall that I asked you a series
19 of questions, and we had any number of conversations
03:03:48 20 concerning several topics related to the take-over of
21 the Hacienda Santa Fé?

22 A. Yes. The thing is that I'm a bit -- was a bit
23 confused because I couldn't see you, and I couldn't hear
24 your voice well either. Excuse me.

03:04:06 25 Q. Fine, thank you. And thank you for confirming.

03:04:09 1 So just to confirm, you can see me okay?

2 You can see my face?

3 A. Yes, now I can.

4 Q. So now you recognize me?

03:04:17 5 A. Yes, I can see you well. Before, I could not.

6 You were off to one side.

7 Q. Well, let me move now.

8 A. Now, yes.

9 Q. Very well. Going back to the topic, do you

03:04:44 10 recall that we spoke on any number of occasions?

11 A. Yes, that's right. Correct.

12 Q. Do you recall that after culminating that
13 process of interviews and conversations, do you recall
14 that a document was drawn up pulling together exactly

03:05:02 15 what you narrated to me? Do you remember that a

16 document was drawn up?

17 A. Yes, I do, correct.

18 Q. And you recall that I read that document to you
19 on several occasions?

03:05:15 20 A. That's right.

21 Q. And do you recall that you had the opportunity
22 to make comments when I read the documents to you?

23 A. That's right. I was able to make comments
24 about the invasions at the Hacienda.

03:05:30 25 Q. Very well. Do you recall that the documents

03:05:34 1 mentioned in your statement were also read by me?

2 MR. ZETINA: I need to object again. I
3 understand, Mr. President, that you gave some leeway,
4 but this is just a series of leading questions, and I'd
03:05:47 5 just want some guidance here.

6 PRESIDENT: Yes, indeed. You have made
7 your point now. He is testifying that he has met with
8 you, and you have drafted the statement for him. So now
9 move on to other topics.

03:06:09 10 MS. DE PENA: Yes. Thank you,
11 Mr. President.

12 Q. Mr. Ferrufino, in the cross-examination the
13 lawyer asked you about a notarial statement from 2018.

14 A. From 2018, yes.

03:06:31 15 Q. In your notarial statement of 2023 there you
16 mention that on 18 August of 2018, you were threatened
17 by the invaders?

18 A. That's right, that's right.

19 Q. Do you remember that?

03:06:50 20 A. Yes, when commander Cinco Estrellas told me to
21 disappear from the Hacienda otherwise they were going to
22 kill me.

23 Q. Do you recall having gone to a notarial office
24 the next day, on 19 August?

03:07:08 25 A. Yes, I went to the lawyer who I mentioned who's

03:07:13 1 in Jinotega, I went to her office mainly to lodge the
2 complaint about the beating and mistreatment that I had
3 been subjected to and just how they had subjected me to
4 physical torture and they had beat me and so I was not
03:07:32 5 thinking clearly because of having been so badly
6 mistreated by them.

7 Q. Do you recall the notary public -- did she read
8 you your statement at the end?

9 A. Yes, ma'am. Actually, I can tell you that I
03:07:54 10 don't recall very clearly whether she read it out or did
11 not or whether she asked me to sign or not.

12 MS. DE PENA: If we could show, once
13 again, the document C-211. Last page, please.

14 Q. And there, allow me, please, to read out one
03:08:44 15 part of what this page says. This is the last part
16 where the notary says: "and I have read this public
17 instrument to the person before me and he finds it in
18 keeping with it and, as notary, I attest to what I've
19 stated here."

03:09:05 20 Do you recall whether the notary read the
21 document to you?

22 A. Yes, now I do. Now I remember.

23 Q. And, Mr. Ferrufino, you've already told us that
24 you went to that notary the day after having received a
03:09:25 25 death threat. Why did you go to this notary?

03:09:32 1 A. Yes, as I was saying, it was to report the
2 abuse and mistreatment that I had suffered at their
3 hands and the death threats that they made to me when
4 they told me they were going to come back for me, when
03:09:50 5 Commander Cinco Estrellas told me that he was going to
6 kill me if I didn't disappear from the Hacienda. And
7 when the gunman grabbed me and massacred me with 25
8 invaders who tortured me more, having left me with
9 these -- in the state I'm in with so many sequelae and
03:10:15 10 the problems that I have with my head and being very
11 disturbed.

12 Q. Do you recall that you said that your intent
13 was to specifically make a record of that episode?

14 MR. ZETINA: Again, that's a leading
03:10:31 15 question, Mr. President.

16 PRESIDENT: Yeah, these are very leading
17 questions. The answer is already in your question, so
18 they're on the borderline. They're not very helpful for
19 the Tribunal, let's put it this way, if you proceed
03:10:51 20 putting questions in such a leading manner.

21 MS. DE PENA: Understood. Thank you.

22 Q. Moving on to another topic, in the
23 cross-examination, the attorney also asked you about the
24 payroll. I wanted to know if you could explain how you
03:11:27 25 received your salary at Hacienda Santa Fé.

03:11:32 1 A. Excuse me, could you repeat the question,
2 ma'am?

3 Q. On the cross-examination, the lawyer asked you
4 questions about the payroll. The payroll at Hacienda
03:11:42 5 Santa Fé. I wanted to know if you could explain to us
6 how you received your salary.

7 A. Yes. At least in 2000 when I came in as a
8 contractor, I wasn't on the payroll but, rather, since I
9 was hired labor, I was paid a part because I could not
03:12:07 10 appear in the payroll. And it was as of 2016 that I
11 would have been on the payroll as a security guard.

12 MS. DE PENA: I'm going to ask that we
13 please show -- if we could put up document C-99. Or
14 C-399.

03:12:40 15 Q. Mr. Ferrufino, I'm going to describe what is at
16 line 8 of this document. There it appears the name
17 Domingo Ferrufino. Would it surprise you that your name
18 would appear on a payroll?

19 A. Well, I don't know how I would be in the
03:13:12 20 payroll if I worked as a security guard at that time.

21 Q. Mr. Ferrufino, let me ask you once again. I
22 ask how did you receive your salary? Were you paid in
23 cash?

24 A. Yes, exactly. I was paid in cash based on the
03:13:44 25 amount I had worked. Then one would say well, how much

03:13:52 1 would one day be and they would add it up and square the
2 figures.

3 Q. Mr. Ferrufino, the attorneys for the other
4 party have called into question whether your witness
03:14:22 5 statement, CWS-12, is actually your statement. I am
6 prepared to read your statement in full, paragraph by
7 paragraph, should the Tribunal allow me to do so, so as
8 to confirm with you that everything that is contained
9 therein is, in fact, your statement. I'm prepared to do
03:14:45 10 so.

11 A. Yes, ma'am. Now I can't quite hear you so
12 well. Maybe the headphones have slipped.

13 Q. Can you hear me clearly now?

14 A. Yes, now I can. Yes, now I can hear you
03:15:04 15 perfectly well.

16 Q. Okay. I was saying that the attorneys for
17 Nicaragua have called into question whether your witness
18 statement, CWS-12, is actually your statement. I'm
19 prepared, if the Tribunal would allow me to do so, to
03:15:21 20 read out your statement paragraph by paragraph for you
21 to confirm.

22 A. Correct.

23 Q. Would you like to do that?

24 A. As you say. As you say.

03:15:34 25 PRESIDENT: The purpose of redirect

03:15:36 1 examination is to deal with questions arising directly
2 out of the cross-examination. During the
3 cross-examination, the Respondent did not challenge
4 every single paragraph in the witness statement, so your
03:15:49 5 redirect questions should be limited to those arising
6 directly out of cross-examination.

7 So we will not go through the entire
8 witness statement on redirect.

9 MR. MULLINS: Mr. President, we understand
03:16:02 10 your decision. We obviously respect it. The only
11 concern we have is, given the unique nature of how we
12 had to do this because of the illiteracy of the witness,
13 we don't want to hear later that any evidence is not
14 admissible because somehow he didn't adopt it.

03:16:18 15 So as long as the evidence comes in as it
16 is and there's no challenge to the authenticity or the
17 veracity of what he said other than they've challenged,
18 that's fine, but we don't want to hear on closing: oh,
19 by the way, he couldn't read this, et cetera. That's
03:16:35 20 our concern.

21 PRESIDENT: Understood. But you have
22 already asked questions about how the witness statement
23 was prepared, how you met and so on.

24 MR. MULLINS: I don't want to put the
03:16:45 25 Tribunal on the spot, but as long as the Tribunal is

03:16:50 1 accepting the witness based on this testimony, just like
2 any other witness statement, despite the unique way it
3 was done, we're perfectly happy to move on, based on
4 that record. That's really what we're concerned about
03:17:02 5 based on the questioning from Nicaragua's counsel
6 earlier today.

7 PRESIDENT: At the same time, we cannot
8 prevent the Respondent from challenging the evidence of
9 the witness and the witness statement given that there
03:17:14 10 is no statement in the witness statement about the
11 witness not being able to read and write. So that is an
12 open issue on which we want to hear submissions, but
13 let's leave it at that for the time being.

14 If you want to put any further questions
03:17:31 15 to the witness on redirect on the questions that were
16 put to the witness by the Respondent's counsel, those
17 questions will be fine. But going through the entirety
18 of the witness statement is not the purpose of redirect
19 examination. You can put questions on the specific
03:18:10 20 paragraphs that were raised by the Respondent.

21 Q. Mr. Ferrufino, could you clarify whether the
22 witness statement, CWS-12, was read to you in its
23 entirety before you signed it? Can you hear me,
24 Mr. Ferrufino?

03:18:53 25 A. It's very -- it's not totally clear.

03:18:58 1 Q. Mr. Ferrufino, could you tell me whether your
2 witness statement, CWS-12, was read to you in its
3 entirety before you signed it?

4 A. Yes.

03:19:10 5 Q. Thank you.

6 MR. APPLETON: Mr. President, we now need
7 to move to closed session.

8 MS. CONOVER: The session has been closed.

9 MR. APPLETON: Do you want me to explain?

03:19:46 10 Mr. President, we are going to address
11 some issues that deal with personal privacy information
12 and data. You've requested in your orders that we
13 minimize that, and we do not believe that it's
14 appropriate for such information to be broadcast. So
03:20:00 15 that's why we're dealing with that right now. We don't
16 expect this will take a very long time.

17 PRESIDENT: Any comments by the
18 Respondent?

19 MR. MOLINA: Just basically obviously
03:20:13 20 whatever questions you're going to ask on this matter
21 need to be limited to the scope of the cross.

22 MR. APPLETON: And they will be. Thank
23 you. But we're still on closed session.

24 PRESIDENT: Can we confirm that the
03:20:32 25 witness can see? It will be Mr. Appleton who will be

03:20:35 1 asking the questions?

2 MR. APPLETON: No, Ms. De Pena will do it
3 in Spanish. I just wanted to confirm the closure and
4 the issues that deal with it, so that we are all very
03:20:42 5 clear. I just want to confirm: so we are closed?

6 MS. CONOVER: The session has been closed.

7 PRESIDENT: We are closed now, so it will
8 be Ms. De Pena.

9 MR. APPLETON: And then as soon as she's
03:20:57 10 finished, I'll advise and I'll give you the other flag.

11 PRESIDENT: Noted.

12 MR. ZETINA: Object. Just before -- I
13 would like for Ms. De Pena to inform where is this in
14 the record?

03:21:35 15 MR. APPLETON: Mr. President, this
16 document has been submitted to the ICSID. It was
17 submitted from the ICSID to the State Department. We
18 want to confirm with the witness, since there's a
19 question as to what this document might be -- I don't
03:21:49 20 want to say anything in front of the witness -- of what
21 this document might be and its existence.

22 PRESIDENT: That's fair enough. You
23 raised the question about the passport, so fair enough.
24 Please go on.

03:22:04 25 MR. APPLETON: Thank you.

03:22:09 1 Q. Mr. Ferrufino, up on the screen, do you
2 recognize the photo of you?

3 A. You were saying, ma'am?

03:22:25 4 Q. Mr. Ferrufino, up on the screen there is an
5 image, and in that image, do you recognize your photo?

6 A. Yes, I do.

7 Q. Thank you.

8 MR. APPLETON: If you can close this --
9 well, we can now go back into the open session.

03:22:43 10 MS. CONOVER: The session is open.

11 Q. Mr. Ferrufino, I'd like to ask you -- this is
12 something that has been discussed -- what has been the
13 impact of those death threats that you received on you?
14 What has it meant for you and your life?

03:23:20 15 A. Yes, ma'am. This is what bothers me most
16 because of all the threats I had. When Commander Cinco
17 Estrellas told me they were going to go to the part up
18 above and since we didn't let them he threatened me with
19 death. He said "I'm going to come back for you". At
03:23:43 20 that same moment, well, I understood that as a serious
21 threat because he was armed with six more invaders who
22 were in the pickup truck.

23 After that, a few days before was when
24 Commander Gorgojo came in and they took the part below
03:24:06 25 where the store was and then the gunmen beat me with 25

03:24:13 1 other invaders and they took me with a rocket mortar and
2 with shotguns, they hit me in the neck and the back
3 brutally. Then they took me -- they disarmed me, and
4 they kicked me and they continued to massacre me with
03:24:34 5 some metal tools, agricultural tools that were there.

6 After this beating where they hit me in
7 the feet, the ribs, the back, this is what bothers me
8 most in the head and the eyesight, and then they took me
9 to Commander Gorgojo to investigate me.

03:24:59 10 Then on 18 August, that's when -- well, we
11 were there. They had taken the farm once again and so
12 Commander Cinco Estrellas said that we should disappear
13 from the Hacienda and if we did not do so they were
14 going to kill us so there would be no witnesses and so
03:25:21 15 it would not be known what's happening at the store.

16 All of those threats that I received
17 really had a very detrimental impact on me physically
18 and morally. They basically destroyed me by these
19 beatings, and today given all the sequelae they've left
03:25:42 20 with the back of my neck, my back, my head. It really
21 set me back. I'm not able to work or plant anything. I
22 can't work in any way whatsoever.

23 Q. Mr. Ferrufino, thank you for your time and your
24 patience. Thank you.

03:26:06 25 A. Thank you.

03:26:09

1 MS. DE PENA: It's possible that the
2 members of the Tribunal will have some questions for
3 you, if you could just hang on for a few more minutes.

4 PRESIDENT: Thank you, Ms. De Pena.

03:26:24

5 There are no questions from the Tribunal
6 to you, Mr Ferrufino, so this concludes your
7 examination. Thank you very much for being available.
8 Thank you for your time. You are released.

9 MR. FERRUFINO: Thank you very much as

03:26:43

10 well.

11 PRESIDENT: So we will then move on with
12 the examination of the witnesses. It will be
13 Mr. Miller. We understand he's available.

14 MR. APPLETON: Yes, we've just sent

03:27:00

15 someone to get him. Do you want to take a short break,
16 or do you want to proceed?

17 PRESIDENT: Let's proceed. We just had a
18 break.

19 MR. APPLETON: We've just sent someone to

03:27:10

20 bring him in. His witness statement is on the table.

21 *(Short pause)*

22 PRESIDENT: Okay. The parties are good to
23 go? Claimant?

24 MR. APPLETON: Yes.

03:30:31

25 PRESIDENT: And the Respondent is ready.

03:30:32

1

THOMAS ARN MILLER

2

PRESIDENT: Good afternoon, Mr. Miller.

3

MR. MILLER: Good afternoon.

4

PRESIDENT: Can you first please state

03:30:39

5

your full name for the record?

6

MR. MILLER: Thomas Arn Miller.

7

PRESIDENT: Very good. You have been

8

called as a witness of fact in this arbitration

9

proceeding so you will be required to tell the truth to

03:30:54

10

the Tribunal. For that purpose, you will be required to

11

make a declaration of a witness. You should have the

12

text of the declaration in front of you. Can I please

13

ask you to make that declaration now?

14

MR. MILLER: I solemnly declare upon my

03:31:10

15

honor and conscience that I shall speak the truth, the

16

whole truth and nothing but the truth.

17

PRESIDENT: Thank you. You have submitted

18

one witness statement in this proceeding dated

19

October 13, 2022. You should have a copy of that

03:31:26

20

statement in front of you.

21

MR. MILLER: I do.

22

PRESIDENT: Can you take a look at that

23

statement and confirm that it is your statement?

24

MR. MILLER: That is my statement.

03:31:45

25

PRESIDENT: Thank you. So the way it's

03:31:47 1 now going to work is there will be first questions by
2 counsel for the Claimant for, I believe, ten minutes --
3 up to ten minutes -- then cross-examination by counsel
4 for the Respondent, Republic of Nicaragua, and possibly
03:32:03 5 further questions on redirect by counsel for the
6 Claimant. The members of the Tribunal may put questions
7 to you at any time. Is that understood?

8 MR. MILLER: It's understood.

9 PRESIDENT: Very good. Mr. Appleton.

03:32:18 10 **DIRECT EXAMINATION**

11 BY MR. APPLETON:

12 Q. Good afternoon, Mr. Miller. Thank you very
13 much for coming all the way here to be a witness before
14 this Tribunal. Let's just start right in.

03:32:27 15 Your witness statement discusses your work
16 at Miller Veneer. Could you tell us something about
17 Miller Veneer?

18 A. Miller Veneer was a company started in 1929 by
19 my grandfather. My father joined shortly after World
03:32:44 20 War II. I came in in 1972, my brother in 1982, and he
21 and I are both presently the owners of Miller Veneers.
22 Miller Veneers slices hardwood logs into fine veneer
23 faces to be used in architectural markets. Office
24 furniture is a big market. Musical instruments and
03:33:09 25 kitchen cabinetry, just to name a few.

03:33:11 1 Q. And can you tell us about your role at Miller
2 Veneer?

3 A. Initially when I first came into the company I
4 was in log buying for about five years. That was
03:33:21 5 followed by a 40-year stint as production -- head of
6 production. And most recently for the last three or
7 four years I've been back in log buying. They kind of
8 put me out to pasture and that's what I do now. I log
9 buy.

03:33:38 10 Q. Mr. Miller, you talk a fair bit about your
11 relationship with Carlos Rondón in your witness
12 statement. How did you know him?

13 A. I had met Carlos back in the early '90s -- I
14 think it was '92 -- when he came to the United States to
03:33:53 15 visit to find a veneer mill that made quality veneers.
16 He was directed to us by Douglas Pond, who was in the
17 State of Indiana at the time. Since then I've had a
18 relationship with him, met with him several times, spent
19 several weeks with him.

03:34:15 20 Q. You talk in your witness statement about going
21 to Nicaragua. We can just go in order. Would you tell
22 us about your first visit to Nicaragua, sir?

23 A. The first visit to Nicaragua was for about a
24 ten-day period in which time we traveled quite a bit of
03:34:38 25 the country from the Pacific coast over to the Hacienda

03:34:40 1 Santa Fé. We were looking to examine to see what logs
2 were available, what kind of species were readily
3 available, but primarily to ascertain whether or not the
4 forests at Hacienda Santa Fé were conducive to
03:34:58 5 veneering.

6 Q. And when you examined the forest, did you have
7 any observations about the nature of the forest, the
8 quality of the trees? Anything to help the Tribunal
9 about that?

03:35:10 10 A. Yes, the forest was comprised of multiple
11 species, but the ones that were most interesting were
12 granadillo and the black walnut. There were pretty good
13 populations of both of them. For the two days that we
14 were there we explored the forest, drove up and down the
03:35:28 15 roads, ventured into the forest some to get a closer
16 look at the trees. Almost all were beautiful form,
17 straight. Wood veneer trees have to be to make good
18 veneer.

19 One of the most important things from my
03:35:44 20 perspective was that there was such a large quantity
21 that were on the same location and that's important in
22 the veneer business because we're looking for a
23 consistency of look to the veneer. And within species,
24 you can get a lot of variation in color and grain
03:35:59 25 pattern due to the environment that they're grown in.

03:36:03 1 It could be changes of moisture -- how much moisture
2 they get can affect it, soil types can affect it. The
3 orientation as they grow on the sides of mountains can
4 change it as well. So I was very impressed with the
03:36:18 5 overall condition of the forest and the volume of the
6 trees and the fact that they would all be a very
7 consistent look, I was pretty confident. My years in
8 the log buying has taught me that.

9 Q. Mr. Miller, I've had the privilege of doing log
03:36:36 10 cases before but most people probably in this room
11 haven't and perhaps not the Tribunal. You told us you
12 were interested in the granadillo trees. Would it take
13 a long time for those types of trees to grow?

14 A. Judging from the growth rings that I observed
03:36:50 15 on when -- we actually cut down a granadillo while I was
16 there, I did -- judging from the growth rings that I was
17 able to see, they were so small that -- the growth rate
18 was very, very slow. Those trees were hundreds of years
19 old. And in having further conversations with some
03:37:09 20 friends that I have that are in the business of selling
21 granadillo for the musical instrument, they told me that
22 those trees, some of them way up in the hundreds of
23 years old.

24 Q. So after you had your visit to Hacienda
03:37:23 25 Santa Fé, what happened next?

03:37:26 1 A. Well, we had another visit. Carlos planned
2 another week to ten days where I came down to visit him
3 and this time we were actually pursuing logs. We had
4 just been scouting the time before, but this time we
03:37:39 5 were actually in the process of buying logs and so that
6 was about another week to ten days that I was down
7 there.

8 After that, once we did secure the logs,
9 we processed those and at that time Carlos came up from
03:37:55 10 Indianapolis where our mill is located and observed the
11 slicing of the veneers and at that point we were able to
12 make determinations of how valuable the wood might be
13 and whether we were interested or not.

14 Q. Was that visit from Mr. Rondón in the same year
03:38:16 15 roughly as your first visit, or was it like a long time,
16 a short time? Help us to understand the flow.

17 A. The period between the visits, only a matter of
18 a couple months at most. And yeah, it all went rather
19 quick. It was all within a calendar year of each other.

03:38:34 20 Q. All right. So I want to ask you, do you have
21 any corrections that you want to make to your witness
22 statement?

23 A. I do have two corrections, both of which are in
24 the sixth paragraph.

03:38:45 25 Q. Okay. Hold on a moment so we can just look at

03:38:48 1 that. All right. And what are these corrections? You
2 said paragraph 6?

3 A. Paragraph 6.

4 Q. Okay.

03:38:57 5 A. The first sentence, starting with the word --
6 well, actually the second sentence that begins "He told
7 me", starting with the word "was" through the word
8 "which." Those words should be struck, from "was" to
9 "which." So it should read: "He told me he owned a
03:39:15 10 sizable agricultural farm."

11 And then the second one, if you wish me to
12 go ahead?

13 Q. Sure.

14 A. It's in the last sentence. And there's a
03:39:25 15 phrase that says "private forest containing around
16 20,300 black walnut." The 20,300 number should be
17 struck, the reason being that at that time when I
18 visited I didn't have a census or a count of the trees.
19 In later years I was made privy to how many trees there
03:39:45 20 were. That was not timely with the statement.

21 Q. Let's talk about that for a moment. You had
22 discussions with Mr. Rondón in later years as well?

23 A. Oh, yes. We had phone conversations.

24 Q. Because this material you're talking about was
03:40:02 25 in the 1990s. So would you tell us something about

03:40:09

1 that?

2 A. The?

3 Q. More recent conversations, that's all.

03:40:16

4 A. Well, Carlos kind of kept me appraised of what

5 was going on with the farm, the plantation, the fact

6 that he was growing coffee was one conversation we had

7 frequently and that at one point he told me that there

8 was a disease that was affecting the coffee trees and

9 that they were going to die and he had to do something

03:40:32

10 differently and then in later conversations he discussed

11 that he was going to grow avocados.

12 Then probably around 2018, I believe it

13 was, he gave me the news that the farm had had all of

14 the forest decimated, stripped.

03:40:52

15 Q. Did he tell you, sir, that all of the forest or

16 did he just talk about the trees, the species you were

17 interested in?

18 A. He told me that all the trees were gone. He

19 said the forest no longer exists.

03:41:08

20 Q. We'll take that up with him. I have nothing

21 further. Thank you, Mr President. I'm going to turn

22 you over to counsel for the Republic of Nicaragua. I'm

23 sure they'll have some questions for you, sir.

24 PRESIDENT: Thank you very much,

03:41:19

25 Mr. Appleton.

03:41:21 1 MS. GONZÁLEZ: Thank you, Mr. President.
2 Ms. Nahila Cortes will conduct the cross-examination.
3 Thank you.

4 PRESIDENT: Please go on.

03:41:26 5 **CROSS-EXAMINATION**

6 BY MS. CORTES:

7 Q. Good afternoon, Mr. Miller. It's a pleasure to
8 meet you. My name is Nahila Cortés and I am counsel for
9 the Republic of Nicaragua and I will be conducting your
03:41:36 10 cross-examination this afternoon.

11 Mr. Miller, I will try to speak as clear
12 as possible, so if you don't understand any of my
13 questions or one of my questions, please let me know and
14 I will try to rephrase it.

03:41:50 15 And before we begin, this is very
16 important. You know that this is a very important
17 international arbitration case, and this proceeding is
18 currently being recorded with a simultaneous translation
19 in English and Spanish. So when I ask you a question, I
03:42:06 20 would really appreciate that you can verbalize that
21 question and avoid making gestures so the court
22 reporters could take basically your answer and put it in
23 the transcript. Okay?

24 A. Okay.

03:42:21 25 Q. Mr. Miller, did you testify before in court?

03:42:24

1 A. I'm sorry?

2 Q. Did you testify before in court?

3 A. In court?

4 Q. Yes.

03:42:29

5 A. No.

6 Q. And did you testify before in any international
7 arbitration case?

8 A. No, I have not.

03:42:40

9 Q. Mr. Miller, you submitted in this arbitration
10 one witness statement dated October 13, 2022, correct?

11 A. That is correct.

12 Q. And did you receive any assistance from
13 Riverside's counsel to prepare your witness statement?

14 A. No, I did not.

03:43:06

15 Q. And, Mr. Miller, did you include all the facts
16 that you consider relevant to your testimony in your
17 witness statement?

18 A. I believe I did at that time, yes.

03:43:27

19 Q. Thank you. And if there had been any material
20 document to your witness statement, would you have
21 included them, correct?

22 A. Yes, I believe so.

03:43:50

23 Q. Mr. Miller, in the preparation of this hearing,
24 did you read the Memorial that was submitted by Claimant
25 in this arbitration? Did you have the chance -- I will

03:43:55 1 repeat the question.

2 Did you have a chance to read the Memorial
3 that was submitted by Claimant in this arbitration?

4 A. No, I did not.

03:44:02 5 Q. And did you read the request for arbitration?

6 A. No, I did not.

7 Q. So, Mr. Miller, you mentioned you are the
8 co-owner of Miller Veneer, right?

9 A. That is correct.

03:44:17 10 Q. And your company is established in Indiana,
11 right?

12 A. That is correct.

13 Q. And your company specialized in manufacturing
14 North American hardwood species, right?

03:44:30 15 A. Primarily, yes.

16 Q. So the main primary source for your company is
17 American wood?

18 A. Yes.

19 Q. Also I understand from your witness statement
03:44:49 20 that your company manufacturers high quality hardwood
21 veneer, right?

22 A. That is true.

23 Q. And you have been all your professional life in
24 this industry, right?

03:44:57 25 A. Yes, I have.

03:45:05 1 Q. Mr. Miller, in 1992 Doug Ponds from the Indiana
2 Department of Agriculture arranged a meeting between you
3 and Mr. Rondón, right?

4 A. That is correct.

03:45:13 5 Q. In 1992 you met Mr. Rondón for the first time
6 in Indiana, right?

7 A. That is right.

8 Q. And in that meeting he told you that he owned a
9 large agricultural farm with a private forest in
03:45:25 10 Nicaragua, right?

11 A. Yes, he did.

12 Q. He also mentioned that that forest contained a
13 large amount of black walnut trees and granadillo,
14 right?

03:45:42 15 A. Yes.

16 Q. And you stated in your witness statement that
17 in that meeting he told you that there were around
18 20,300 black walnut trees, right?

19 A. Yes, and that's a statement that I corrected
03:45:55 20 just now.

21 Q. Why did you decide to correct that statement
22 now?

23 A. It was brought to my attention that the census
24 that was conducted on those trees was conducted much
03:46:07 25 later, and I knew about the 20,300 number because of

03:46:10 1 conversations that I had had with Carlos over the years,
2 and so to make my statement correct, I wanted to strike
3 the 20,300 to read just many black walnut.

4 Q. But when you prepared this witness statement,
03:46:24 5 you thought that that was the number in '22, right?

6 A. Yes.

7 Q. So before this hearing, with a conversation
8 with Carlos Rondón, you decided to change this number,
9 right?

03:46:46 10 A. It's after conversations that it was made clear
11 to me that -- I knew after thinking about it that the
12 20,300 was a good number, but it was a number that I had
13 learned of later than the 1992 date that I cited.

14 Q. So in 1992, then, you traveled to Nicaragua,
03:47:09 15 and you inspected the forest, right?

16 A. Yes, I did.

17 Q. And that was the first time that you inspected
18 this forest, right?

19 A. Yes, 1992.

03:47:18 20 Q. And it was the only time that you inspected the
21 forest?

22 A. No. The following trip we were going through
23 forests as well, so I was seeing more of the forest in
24 Nicaragua at that time.

03:47:36 25 Q. And there was -- I just want to understand

03:47:38 1 about this inspection because I think that it's very
2 important. You have been all your professional life in
3 this business. You didn't count the trees then, right?

4 A. No. There was no point in trying to count the
03:47:52 5 trees because I could not be down there long enough to
6 count all the trees.

7 Q. Okay, but don't worry. There were some black
8 walnut trees and some granadillo trees. A big amount?

9 A. There were large amounts. Everywhere we went
03:48:04 10 we were seeing more and more and more. And it gave me a
11 good idea that the density of the forest was such that
12 it would contain a like amount.

13 Q. Thank you. So after this inspection you
14 received eight containers of log from Hacienda Santa Fé
03:48:19 15 with black walnut trees and granadillo trees, right?

16 A. Yes.

17 Q. This was in 1992?

18 A. It would have been in the same -- I believe in
19 1992, yes. Like I said earlier, everything happened
03:48:33 20 within a calendar year and I think it's going back 32,
21 34 years back. As well as I can remember, 1992 was the
22 year that this occurred.

23 Q. And you received -- so in these eight
24 containers there was again black walnut trees and
03:48:56 25 granadillo trees, right?

03:48:57 1 A. That is correct.

2 Q. In your statement you did not attach any
3 document showing that you bought that wood, right?

4 A. That's correct, I didn't buy the wood.

03:49:10 5 Q. How did you get it then?

6 A. Carlos contributed the wood for the experiment,
7 and I contributed the production time, labor.

8 Q. And you did not attach any bill of lading for
9 receiving these containers, right?

03:49:29 10 A. The logs were received at the Port of Miami,
11 Florida, at which time customs reviewed the contents of
12 the containers and passed them as within keeping with
13 any laws that were applicable at the time.

14 Q. So you don't have any shipping document?

03:49:48 15 A. I would never keep a shipping document that far
16 back.

17 Q. Yes. Also in your statement you did not
18 include any evidence for this inspection to the forest
19 in 1992, right? You did not attach any document?

03:50:11 20 A. I'm sorry?

21 Q. My question is that in your statement you did
22 not attach any document of this inspection to the
23 forest, right?

24 A. No. No document was created at the time. It
03:50:21 25 was a visual that I'd conducted.

03:50:26 1 Q. And no pictures then?

2 A. No, no photographs.

3 Q. And here you mentioned a tree census. So let
4 me show you a document.

03:50:39 5 MS. CORTES: Ricky, could you please put
6 on the screen the document C-84.

7 Q. This document is a tree census of black walnut
8 trees that was prepared by Luis Gutierrez.

9 MR. APPLETON: Excuse me. The witness
03:50:51 10 didn't say -- he said that there was no tree census.
11 That was his testimony.

12 MS. CORTES: He mentioned a tree census.

13 MR. APPLETON: He said there was an
14 absence. He said "without a tree census I couldn't tell
03:51:05 15 you this." We can read it back. He never gave
16 testimony that there was a tree census. I want to be
17 very clear. I was in the room.

18 PRESIDENT: You will have time to come
19 back on redirect.

03:51:15 20 MR. APPLETON: Well, she's putting words
21 in his mouth. I want to make sure that we're clear.

22 MS. CORTES: I want to show the witness a
23 document.

24 PRESIDENT: You put the document to the
03:51:26 25 witness and ask the question.

03:51:28 1 MS. CORTES: That is relevant to his
2 testimony. Ricky, could you please put C-84? I am not
3 seeing it on the screen. Oh, there's a delay. The
4 English version, please.

03:52:01 5 Q. Mr. Miller, did you see this document before?

6 A. No, I have not.

7 Q. So this is a tree census of black walnut trees
8 that was prepared by Luis Gutierrez, an employee of
9 INAGROSA. You can see there --

03:52:15 10 MS. CORTES: Ricky, could you please show
11 the signature, Luis Gutierrez.

12 Q. This is a tree census from January 20, 2018.

13 Okay? And in this document he says that the total
14 amount of black walnut trees is 20,300 black walnut
03:52:34 15 trees --

16 MS. CORTES: No, no, in the last line.
17 No, no, the total.

18 Q. That is exactly, you know, the same number that
19 you included in your witness statement that you
03:52:47 20 corrected. Okay?

21 I want just to check the dates with you
22 because I'm a little bit confused. So in this tree
23 census it says that the black walnut trees were
24 planted -- at least 16,000 black walnut trees were
03:53:07 25 planted in the year 2000. Do you see that?

03:53:12 1 A. Yes, I do.

2 Q. And then it says that in the following years
3 they planted 1,800 black walnut trees between 2015 and
4 2016. Do you see that?

03:53:23 5 A. Yes, I do.

6 Q. And then in the last line it says 2,500, that
7 they were planted between the years 2017 and 2018.

8 So according to this document, the trees
9 that you saw in the forest did not exist, right?

03:53:43 10 A. No. My eyes do not deceive me. The black
11 walnut trees that I saw on Hacienda Santa Fé existed.
12 They were all mature, large specimens that were hundreds
13 of years old and very, very large, ready to be -- for
14 the most part they were the size that you could veneer
03:54:06 15 very easily. As a matter of fact, we don't generally
16 get that size walnut up here in the United States, so
17 these were extraordinarily large.

18 I understand that these numbers, the
19 20,300, reflect the plantings that they did in the years
03:54:21 20 that are cited and that's fine, I understand that. But
21 there was an existing stand of walnut that was very
22 sizable and Carlos was planting more walnuts to do a
23 sustainable harvest for generations to come.

24 Q. So then, according to your inspection, you saw
03:54:38 25 a large amount of black walnut trees, and it would be

03:54:44 1 then impossible to say that these trees were planted
2 eight years after your visit, right?

3 A. Rephrase that or restate it, please.

4 Q. So you're confirming -- actually you're
03:54:58 5 clarifying me that in your visit you saw a large amount
6 of black walnut trees, right?

7 A. Correct.

8 Q. So any documents that shows that this
9 document -- were planted eight years after your visit,
03:55:13 10 it's inaccurate with what you saw, right?

11 A. The trees that I saw, the mature walnut trees,
12 existed at the time of my visit in '92. These trees
13 obviously, as are stated, were planted. They were
14 saplings. They were planted well after my visit. Last
03:55:33 15 time I was in Nicaragua was probably 1992. These were
16 planted 20 years later.

17 Q. Okay.

18 A. So I didn't have a visual on these plantings.

19 Q. I see. Thank you.

03:55:45 20 MS. CORTES: Ricky, you can take down that
21 document.

22 Q. Mr. Miller, so you told that after the visit to
23 Nicaragua, you received these eight containers and you
24 inspected them, right?

03:56:12 25 A. That is correct.

03:56:14 1 Q. You also mentioned that this was in 1992,
2 right?

3 A. Yes.

03:56:23 4 Q. And then also in 1992, you informed Mr. Rondón
5 that your company was prepared to obtain the entire
6 quantity of granadillo trees, correct?

7 A. Yes.

03:56:39 8 Q. Now Mr. Miller, nowhere in your witness
9 statement do you say that you would buy black walnut
10 trees from Hacienda Santa Fé, correct?

11 A. I'd have to look at it.

12 Q. Take your time, please.

13 This reference is in paragraph 13, so it
14 will be easier.

03:57:22 15 A. I see. The understanding that Carlos and I had
16 included that of walnut as well as the granadillo.

17 Q. But you did not include that in your witness
18 statement, right?

19 A. No, I did not include that.

03:57:44 20 Q. Mr. Miller, you did not attach any contract
21 between your company and INAGROSA to your witness
22 statement, right?

23 A. We had a verbal contract. It was kind of a
24 right of -- it was a right of first refusal. At the
03:57:56 25 time that Carlos saw fit to start harvesting any of the

03:58:00 1 granadillo or the black walnut, we would get in touch, I
2 would join him down at the Hacienda and do a take-up of
3 the logs that were prepared.

4 Q. But, Mr. Miller, that is not included in your
03:58:13 5 witness statement.

6 A. Maybe it isn't. I don't -- you want me to look
7 it all over and confirm that it is or isn't?

8 Q. Yeah, sure.

9 A. Okay. You're correct, that is not in my
03:58:37 10 witness statement.

11 Q. So you did not attach any contract, any
12 physical contract, to your witness statement, right?

13 A. Correct.

14 Q. And you did not include any price for the
03:59:01 15 granadillo trees that you were prepared to acquire,
16 right?

17 A. The price was to be determined at the time of
18 the harvest and the log take-up. The pricing of wood is
19 very volatile, it fluctuates wildly, and in all
03:59:19 20 likelihood the granadillo would continue to get more and
21 more valuable as will the walnut. So there was no sense
22 in trying to attach any value to it. The value would be
23 determined at the time of the harvest.

24 Q. So from your visit until 2018, you considered
03:59:36 25 that it was not necessary to have or to sign any

03:59:40 1 contracts between Miller Veneer and INAGROSA, right?

2 A. I felt no need for it. Carlos and I had a
3 verbal agreement, and I trusted Carlos, having been with
4 him for over four weeks total time. I thought of him as
03:59:56 5 a very honorable, honest person.

6 Q. Also in your statement you did not attach any
7 document showing any transaction between your company
8 and INAGROSA, right?

9 A. There was not any financial transaction between
04:00:08 10 the two of us.

11 Q. So for these last years, you did not buy any
12 lumber from INAGROSA, right?

13 A. INAGROSA had not been harvesting any, so the
14 answer is no, we had not been buying any.

04:00:24 15 Q. Thank you.

16 Also you mentioned a few minutes ago that
17 you had some conversations with Mr. Rondón after this
18 visit, correct?

19 A. After -- after -- I'm sorry, after the visit?

04:00:37 20 Q. Yes.

21 A. Yes, I've had several conversations with
22 Carlos, and I've seen him a few times.

23 Q. Did you send any email regarding the
24 acquisition of lumber?

04:00:49 25 A. No. I'm old school. I don't do much emailing.

04:00:57 1 Q. Thank you. So basically you were just having
2 telephone communications regarding this business?

3 A. Yes.

4 Q. Did Mr. Carlos Rondón inform you that, in the
04:01:12 5 year 2015, he requested to the environmental authority
6 of Nicaragua that he wanted to declare his farm as a
7 private wildlife reserve to conserve the forest?

8 A. I believe he did mention that, yes.

9 Q. And are you aware that if you declare an area
04:01:31 10 as a protected area, you cannot harvest the forest?

11 A. That would be news to me because in the United
12 States you can commit your land to conservation
13 easements and other wildlife easements, but it doesn't
14 preclude you from harvesting in a sustainable manner.

04:01:54 15 So my assumption would be that had he had the land
16 certified that you'd still be able to harvest was my
17 impression.

18 Q. And did he tell you that the government of
19 Nicaragua designated this place, the farm, as a
04:02:10 20 protected area in 2018?

21 A. I don't recollect hearing those words, no.

22 Q. And Mr. Rondón, I would like to take you to
23 paragraph 14 of your witness statement. Mr. Miller,
24 sorry. For the record, I will say it again.

04:02:34 25 Mr. Miller, I would like to take you to

04:02:36 1 paragraph 14.

2 So in this paragraph you mention that
3 Mr. Rondón told you that some unlawful persons occupied
4 Hacienda Santa Fé in the summer of 2018, right?

04:02:47 5 A. Yes.

6 Q. He also informed you that the private forest
7 was totally deforested, correct?

8 A. That's what he told me or what I gathered from
9 what he was telling me.

04:03:03 10 Q. And did he show you any picture of this
11 deforestation?

12 A. No. I believe we had a conversation to that
13 effect and he didn't have any photographs and I offered
14 to take a trip down there to observe and he told me it
04:03:17 15 probably wouldn't be in my best interest to go down
16 there, from a safety standpoint.

17 Q. Mr. Miller, in your inspection you told us that
18 these trees were really big, right?

19 A. The ones I was seeing, yes.

04:03:38 20 Q. And they had a good volume, right?

21 A. Yes, quite large.

22 Q. Let me ask you a question. You have been again
23 in this industry all your professional life. Do you
24 think it's possible to destroy a forest without any
04:03:52 25 special machinery?

04:03:56 1 A. Well, they've been doing it for hundreds of
2 years before there was any specialized machinery. Horse
3 logging has been done. They use elephants in Indonesia
4 for teak harvesting. I know you don't have elephants in
04:04:12 5 Nicaragua, but it's possible to log without having real
6 sophisticated logging equipment.

7 Q. So you think that more than 20,300 black walnut
8 trees at least could have been totally destroyed?

9 A. The 20,300 black walnut trees were saplings.
04:04:31 10 None of them could have been large enough to harvest.
11 They probably would have -- it was the larger diameter
12 trees that I was interested in and that were probably
13 the -- well, definitely were the most valuable on the
14 property.

04:04:46 15 Q. Mr. Miller, do you have any reason to believe
16 that Mr. Rondón was not telling you the truth?

17 A. I've never caught Carlos in a lie. He's always
18 been very truthful to me. No, I respect him and believe
19 that he's truthful.

04:04:59 20 Q. So you think that he's a truthful person?

21 A. From all of my experience with him over the
22 years, yes, he's been very truthful to me.

23 Q. And you also believe that a total forest was
24 totally deforested in the year 2018?

04:05:16 25 A. I believe Carlos is telling me the truth. I

04:05:18 1 have no reason to disbelieve what he's telling me.
2 Again, I volunteered to go down there to observe, but it
3 was -- like I said, it was deemed it was not in my best
4 interest to go down there.

04:05:32 5 Q. Well, thank you very much, Mr. Miller, for your
6 time today.

7 A. Thank you.

8 PRESIDENT: Thank you, Ms. Cortes.
9 Redirect?

04:05:43 10 MR. APPLETON: Thanks.

11 **REDIRECT EXAMINATION**

12 BY MR. APPLETON:

13 Q. Mr. Miller, thank you very much. I'm going to
14 be very brief.

04:05:48 15 So let's see if I can make this as easy as
16 possible. First of all, I probably don't need the
17 document, so let's see if we can go through it.

18 Ms. Cortes took you through some
19 questions, and I think you may have just clarified it in
04:06:03 20 your last statement, but just to be certain, you've been
21 in the log business for a long time. Is that correct?

22 A. Since 1972.

23 Q. Okay. So my question is, is there any chance
24 that you would confuse saplings or younger black walnut
04:06:24 25 trees for mature trees?

04:06:27 1 A. I can't imagine the circumstances where I would
2 misjudge that.

3 Q. Even if they were eight years old on the list
4 or ten years old, could you tell a difference between a
04:06:37 5 mature tree and a younger tree?

6 A. Yes, I think the girth and the height would
7 tell the whole story.

8 Q. Since I don't -- we all don't grow trees and
9 you know a lot about it. I mean, is it really different
04:06:49 10 or just a little different?

11 A. Oh, it's as different as a sparrow is to a
12 giraffe. A huge difference.

13 Q. So what you've told in your testimony was that
14 you actually went in 1992 and you saw a large number of
04:07:08 15 black walnut trees at Hacienda Santa Fé. You would not
16 be confused with something that would be new. That's
17 what you're saying?

18 A. That's correct, yes.

19 Q. So if there were additional trees that were
04:07:18 20 there, they would just be additional? There's no
21 confusion.

22 A. I'm sorry. Will you --

23 Q. I'm sorry, it's my own fault. I'll withdraw my
24 question.

04:07:30 25 PRESIDENT: These are very leading

04:07:31 1 questions, Mr. Appleton.

2 MR. APPLETON: Pardon me?

3 PRESIDENT: These are leading questions.

4 I think we get your point.

04:07:38 5 MR. APPLETON: Yes. I can move to the
6 next one.

7 Q. I want to ask you about the questions that
8 Ms. Cortes, she asked you at the beginning, she referred
9 to the fact that your company primarily was focused on
04:07:54 10 wood from North America and yet you had gone down and
11 you testified today and in your witness statement you
12 had gone to Central America to look at this wood.

13 Why would you be interested in wood from
14 there?

04:08:08 15 A. Well, it's another product that we would have
16 that we could sell. It's very clear to me and to those
17 in the industry that those species of wood from Central
18 America are valuable and very marketable, and so in the
19 interests of broadening our offerings to our customers,
04:08:28 20 I wanted to secure some logs from Central America.

21 And in the past we had secured some
22 mahogany from Brazil, and we've also done ziricote from
23 Mexico, some cocobolo from Mexico.

24 So we have bought from down there, just
04:08:45 25 not any great deal and I wanted to do more of that.

04:08:50 1 Q. And your company handles a great deal of wood.
2 Is that what you're saying?

3 A. Yes, we -- we handle -- I'll try to put it --
4 we handle about a million and a half board feet of logs
04:09:02 5 a year.

6 Q. Just for the lay people here, that's a lot?

7 A. That would be probably close to 150,000 logs in
8 a year's time.

9 Q. Okay.

04:09:12 10 MR. APPLETON: I have nothing further.

11 PRESIDENT: Thank you. Ms. Greenwood?

12 QUESTIONS BY THE TRIBUNAL

13 MS. GREENWOOD: Mr. Miller, just if you
14 would, I just wanted to follow up on a couple of points
04:09:29 15 just to assist the Tribunal so we properly understand
16 your testimony.

17 Can you help the Tribunal with roughly
18 what height a hundred-year-old black walnut tree
19 reaches?

04:09:48 20 MR. MILLER: The ones that I'm familiar
21 with in the United States in a hundred years would
22 probably obtain a height pushing 85 to 100 feet.

23 MS. GREENWOOD: And in terms of the
24 diameter of a trunk, what roughly would that be?

04:10:07 25 MR. MILLER: Well, the walnut again in the

04:10:10 1 United States that I'm very familiar with will grow at
2 an average rate of about an eighth of an inch of a year.
3 That means that every year it's putting on about a
4 quarter inch in diameter. So if you use that as a rule
04:10:21 5 of thumb, when you see a tree that's of a certain
6 diameter, if you divide that, you can arrive at the age
7 of the tree and be very, very close.

8 MS. GREENWOOD: And the ones that you saw
9 in your visit in 1992, you said were hundreds of years
04:10:36 10 old, in your estimation?

11 MR. MILLER: In my estimation, yes. I
12 remember the diameters of these trees, most of them
13 exceeded 4 feet on the black walnut. That would be
14 48 inches. So a quarter inch a year, you can kind of do
04:10:50 15 the math on that.

16 MS. GREENWOOD: And the one you cut down,
17 you chose a smaller one to cut it down?

18 MR. MILLER: It was a granadillo. It was
19 probably a 30-inch diameter at what you'd measure at
04:11:06 20 10 feet.

21 MS. GREENWOOD: Thank you. And just again
22 so that we understand your testimony correctly, is it my
23 understanding that you went to Nicaragua twice in 1992?
24 Apologies, I'm not sure I followed you.

04:11:19 25 MR. MILLER: Yes. Twice and both times

04:11:22 1 were for roughly ten days each.

2 MS. GREENWOOD: And you haven't been back
3 since?

4 MR. MILLER: No, I have not.

04:11:27 5 MS. GREENWOOD: Thank you very much.
6 That's helpful. No more questions from me.

7 PRESIDENT: Just to follow up on
8 Ms. Greenwood's questions, would you be able to remember
9 the area covered by the walnut trees in terms of acres
04:11:44 10 or hectares or whatever the unit?

11 MR. MILLER: I could only do a rough guess
12 of that. Like I said, we were there for two days and
13 for those two days we were driving around Santa Fé,
14 staying on the plantation. So during that time,
04:12:06 15 everywhere we turned -- and most of it was forest --
16 everywhere we turned there were more and more trees.
17 Just kind of a never-ending array of trees, many of
18 which were the black walnut and, like I said, the
19 granadillo, I think that thousand number was probably a
04:12:21 20 pretty good number that existed on the property.

21 PRESIDENT: And both the -- the walnut
22 trees were all over the place, or they were evenly
23 distributed in the region?

24 MR. MILLER: Fairly even. I think more in
04:12:38 25 the -- as the ground maybe got a little bit lower, but

04:12:42 1 not quite as steep, I think they were probably more
2 plentiful. But they would occur on steeper hillsides as
3 well.

4 PRESIDENT: And the same for the
04:12:53 5 granadillo or not?

6 MR. MILLER: Granadillo just -- they just
7 happened to be where they happened to be. I could not
8 make any -- nor did I try to make any sense out of why
9 they were growing in one spot or another. It seemed
04:13:07 10 like a fairly even distribution like you would see with
11 our forests up here and our species mix that we have up
12 here.

13 PRESIDENT: Okay. Thank you very much.
14 Do the questions by the Tribunal give rise
04:13:19 15 to any questions by counsel?

16 MR. APPLETON: We have one question.

17 **FURTHER REDIRECT EXAMINATION**

18 MR. APPLETON: Mr. Miller, the President
19 asked you a question about thinking about the area that
04:13:30 20 was covered. When you were at Hacienda Santa Fé and you
21 went to the forest, did you see a map?

22 A. They had a map in the house, kind of in the
23 office area of the house.

24 Q. Did you have a map with you when you were out
04:13:46 25 to the forest?

04:13:47 1 A. I did not have a map. That was not provided to
2 me.

3 Q. I understand this is 30 years ago. So we know
4 it's a long time.

04:13:53 5 A. I don't recollect there being a map that I was
6 privy to that we were taking with us as we drove around.

7 Q. So you really wouldn't know the area of what
8 the forest was in comparison to everything else. You
9 just knew that when you were in the forest what you saw?

04:14:07 10 Or did you know -- we're trying to understand your
11 recollection of the size of the forest. Can you help
12 us?

13 A. Size, as in the acreage of the forest?

14 Q. If you could do that or -- yes, that would be
04:14:18 15 good.

16 A. Well, all I can say is of the land that was
17 there, I would guesstimate that there was probably --
18 80 percent of it was in forest and maybe 20 percent was
19 open at the most.

04:14:34 20 Q. But how do you know which is that land? That's
21 what I'm trying to understand.

22 A. The boundaries of the property?

23 Q. Yes, or things like that?

24 A. I had to trust in Carlos taking me around that
04:14:44 25 he knew the place. I had no concept or how the land lay

04:14:49 1 or anything, other than I did see the map initially when
2 we first went there.

3 Q. So your testimony is you saw lots of forest but
4 you don't really know what was there? Or you did know?
04:15:00 5 Which is it?

6 A. I knew that we -- no, Carlos was showing me
7 around, and I trusted that Carlos was showing me his
8 forest and that's what we were there to look at.

9 MR. APPLETON: Thank you. That was very
04:15:14 10 helpful. Nothing further.

11 PRESIDENT: Anything on the Respondent's
12 side?

13 MS. CORTES: No, thank you.

14 PRESIDENT: No questions. Very good.
04:15:23 15 Thank you very much, Mr. Miller. This concludes your
16 examination. Thank you for your time. You are
17 released.

18 So it's still early, a quarter past 4. So
19 I suggest we have a 15-minute break. We understand
04:15:45 20 Mr. Rondón is available.

21 MR. APPLETON: I believe Mr. Rondón is
22 here and, if that's the case, then we will be ready.

23 PRESIDENT: Let's have a break now, and we
24 will continue in 15 minutes. Then we can go on until 6
04:16:03 25 and the hard break is at 6 where we are, so keep that in

04:16:07 1 mind when you are planning your examination.

2 (Brief recess)

3 PRESIDENT: Okay. Let's start. I
4 understand Mr. Rondón is available.

04:38:03 5 MR. APPLETON: I'll bring him.

6 **CARLOS JOSÉ RONDÓN**

7 PRESIDENT: Good afternoon, Mr. Rondón.

8 MR. RONDÓN: Good afternoon.

9 PRESIDENT: I understand you will be
04:38:57 10 testifying in English?

11 MR. RONDÓN: Yes, sir.

12 PRESIDENT: Very good. Welcome to the
13 hearing.

14 MR. RONDÓN: Thank you.

04:39:13 15 PRESIDENT: If I could first ask you to
16 state your full name for the record, please?

17 MR. RONDÓN: My name is Carlos, middle
18 name José, last name Rondón.

19 PRESIDENT: Thank you very much. You have
04:39:33 20 been called as a witness of fact to this arbitration
21 proceeding, so you will be required to tell the truth
22 and for that purpose I would ask you to make the
23 declaration of a witness. If you could read it, please?

24 MR. RONDÓN: I solemnly declare upon my
04:39:50 25 honor and conscience that I shall speak the truth, the

04:39:54 1 whole truth and nothing but the truth.

2 PRESIDENT: Thank you very much, sir. You
3 have submitted two witness statements in this
4 arbitration. The first one is dated 30 September 2022,
04:40:12 5 and the second one, 31st October 2023. You should have
6 hard copies of these witness statements.

7 MR. RONDÓN: Yes, I do.

8 PRESIDENT: And can you please confirm
9 that these are your witness statements.

04:40:46 10 MR. RONDÓN: Yes, they are.

11 PRESIDENT: Very good. I'm sure counsel
12 has explained how this works, but let me lay it out for
13 you one more time.

14 So, first, there will be a direct
04:41:00 15 examination by counsel for the Claimant, and there will
16 a cross-examination by counsel for the Respondent.
17 Further questions, if necessary, by counsel for the
18 Claimant. The members of the Tribunal may ask questions
19 to you at any time. Is that clear?

04:41:17 20 MR. RONDÓN: Yes, sir.

21 PRESIDENT: Very good. Over to the
22 Claimant.

23 MR. HILL: Thank you, Mr. President, and
24 members of the Tribunal. Mr. President, may I
04:41:28 25 proceed?

04:41:30

1

DIRECT EXAMINATION

2

BY MR. HILL:

3

Q. My name is William Hill, and I'm counsel, along with my co-counsel, for the Claimant, Riverside.

4

04:41:41

5

Mr. Rondón, at the time of the 2018 invasion, what was your role at INAGROSA?

6

7

A. My role at INAGROSA, I was the vice president of INAGROSA and chief operating officer.

8

9

Q. At the time of the 2018 invasion, who was the president of INAGROSA?

04:41:57

10

11

A. The president of INAGROSA was Melvin Winger, my father-in-law, who since is deceased.

12

13

Q. In what year was INAGROSA incorporated?

14

A. INAGROSA was incorporated February 19, '96.

04:42:17

15

16

Q. In what year did INAGROSA purchase Hacienda Santa Fé?

17

A. December 15, 1997.

18

19

Q. What was INAGROSA'S original business at Hacienda Santa Fé?

04:42:30

20

A. It was growing premium coffees.

21

22

Q. Why did INAGROSA change from coffee to other products?

23

24

A. We transitioned out of coffee into Hass avocado because of the Roya fungus that drastically reduced the production of coffees around the world.

04:42:51

25

04:42:54 1 Q. When did you transition to Hass avocados?

2 A. We started the transition into Hass avocado in
3 2013.

4 Q. Why did you transition to Hass avocados?

04:43:05 5 A. We transitioned into Hass avocado because the
6 Guatemalan variety of one of the components of the Hass
7 avocado is native to our farm, is native to the
8 highlands of Mesoamérica. It's called the Guatemalan
9 race and it's got 39 percent of the genes of the Hass
04:43:29 10 avocado and it grows extremely well in our farm. Matter
11 of fact, we have, you know, hundreds of trees by the
12 farm.

13 Also, Hass avocado is in high demand
14 around the world. It's amicable and sustainable with
04:43:52 15 the environment.

16 Q. Thank you. You say in your witness statement
17 that you reside in Colorado. In the years before the
18 2018 invasion, how often did you visit Hacienda
19 Santa Fé?

04:44:06 20 A. During the era of coffee at Hacienda Santa Fé,
21 I spent 50 to 60 percent of the time in Nicaragua.
22 After coffee, I reduced my stay in Nicaragua during the
23 transition time.

24 Q. Nicaragua's Reply witness statement from
04:44:22 25 Mrs. González says that you are mistaken when you say

04:44:26 1 that INAGROSA had meetings with environmental officials.
2 Do you have a response to her statement?

3 A. She is mistaken. We had a rep directly under
4 me, Francisco Rivera, that met with MARENA and that met
04:44:45 5 INAFOR personnel.

6 Q. Attorney General Diana Gutiérrez, in
7 paragraph 17 of her second witness statement, said that
8 there was an earlier invasion in 2017 of Hacienda
9 Santa Fé. Do you have a comment on that?

04:45:01 10 A. That never happened. I was there in 2017. In
11 2018 we built many kilometers -- 32 kilometers of roads
12 inside the farm -- and we had rapid movement inside the
13 farm with four-wheelers and a Rhino. I myself would
14 inspect the farm. We had a security detail at the farm,
04:45:31 15 and our chief agronomist also went around the farm. And
16 there was never such thing as an invasion by 170 people.

17 170 people in a forest, they leave their
18 mark, footprint. It's hard to live if you don't have
19 built homes there. The tropics, no matter if it is
04:45:57 20 lowlands or highlands, are hostile if you don't have the
21 proper living conditions.

22 Q. And you saw no one?

23 A. I saw no one.

24 Q. What was the effect of the seizure of Hacienda
04:46:08 25 Santa Fé on INAGROSA?

04:46:11 1 A. The confiscation of Hacienda Santa Fé in June
2 of 2018 was very catastrophic for INAGROSA. Me, the
3 personnel, the environment of Santa Fé, our forest, our
4 coffee -- our avocado plantation, and our workers that
04:46:37 5 lost their jobs, their employment, and also their homes.
6 Because most of them lived at the farm.

7 Q. I understand that there were death threats
8 against you. Can you tell us about their impacts on
9 you?

04:46:53 10 A. Yes, there were credible death threats against
11 me and other members of our personnel.

12 As for me, it's very troubling.
13 Psychologically suffer. It's like down, you're
14 depressed, you're anxious, you don't concentrate well,
04:47:21 15 you question those people why. They're very dangerous
16 people because they were involved in violent actions
17 during the 1980s.

18 Q. Thank you, Mr. Rondón.

19 Describe the negotiations between INAGROSA
04:47:36 20 and the government for the sale of Hacienda Santa Fé or
21 portions thereof --

22 A. We never --

23 Q. -- for the occupants who lived there?

24 A. We never sat down with the government to
04:47:48 25 negotiate anything. We had purchased the farm for its

04:47:50 1 potential, and we were going to develop that potential.

2 Q. So no negotiations?

3 A. No negotiations ever.

4 Q. Was there ever a dispute between INAGROSA or
04:47:59 5 its predecessor owner and the occupants?

6 A. Agropecuarias Santa Fé in my father's time, and
7 INAGROSA in our times, never had a dispute with the
8 occupiers of the eastern part of Hacienda Santa Fé. It
9 was the government of Nicaragua that had a dispute with
04:48:16 10 them as to where they were going to be settled and issue
11 title for them to live.

12 Q. You mentioned Agropecuarias Santa Fé. Was the
13 owner prior to Agropecuarias Santa Fé a private owner?

14 A. Yes, prior to my father purchasing Hacienda
04:48:42 15 Santa Fé under Agropecuarias Santa Fé was Don Cayetano
16 Castellón Rivera, a private owner since 1950.

17 Q. Please tell the panel what Hacienda Santa Fé
18 meant to you.

19 A. Hacienda Santa Fé, to me, was like a paradise.
04:49:03 20 The unique microclimates, the location, the forest, the
21 hydrology of the farm, the river, the wildlife, the rich
22 volcanic soils. I only have good things to say about
23 Hacienda Santa Fé. It's like a promised land to me.

24 Q. Mr. Rondón, do you have any corrections to your
04:49:35 25 witness statement?

04:49:35 1 A. No, I do not have corrections to my witness
2 statements.

3 Q. Thank you. Mr. President, I have just a couple
4 of brief questions for the second part.

04:49:47 5 PRESIDENT: Please go on.

6 Q. Mr. Rondón, after the invasion, were you
7 willing -- did you consider trying to return to Hacienda
8 Santa Fé?

9 A. That was always our intention, to develop the
04:50:02 10 potential of Hacienda Santa Fé and to change the
11 economic geography of Nicaragua in that part of
12 Nicaragua, which is very poor. And I did consider
13 returning to Hacienda Santa Fé, but under the right
14 conditions. There had to be law and order in the
04:50:22 15 country. There has to be respect for human rights. And
16 in December of 2021, the former counselor for Nicaragua
17 in this Tribunal resigned his role and Mr. Paul Reichler
18 stated very clearly what was happening in Nicaragua.
19 The fundamental in Nicaragua had changed and there was
04:50:54 20 no respect for human rights.

21 And because of that, it wasn't conducive
22 to create an environment for us to invest again in
23 Nicaragua. Besides, I had death threats against me.

24 MR. HILL: Nothing further.

04:51:15 25 PRESIDENT: Thank you very much, Mr. Hill.

04:51:18 1 Cross-examination, Respondent? Ms. González.
2 MS. GONZÁLEZ: Thank you. Mr. Molina will
3 conduct Mr Rondón's cross-examination.
4 PRESIDENT: Please.

04:51:27 5 MR. MOLINA: Thank you, Mr. President.
6 **CROSS-EXAMINATION**
7 BY MR. MOLINA:
8 Q. Good afternoon, Mr. Rondón.
9 A. Good afternoon.

04:51:32 10 Q. My name is Marco Molina. It's nice to meet
11 you.
12 A. Likewise.
13 Q. You're obviously going to be testifying in
14 English today, correct?

04:51:40 15 A. Yes.
16 Q. You also speak Spanish, correct?
17 A. I do.
18 Q. And you can read Spanish language documents.
19 True?

04:51:48 20 A. Very well.
21 Q. So just to confirm for the record, you're
22 currently the president and chief operating officer of
23 INAGROSA, correct?
24 A. Yes.

04:51:57 25 Q. You're also one of two operating managers of

04:52:01 1 Riverside Coffee, correct?

2 A. Yes.

3 Q. The other being your wife, correct?

4 A. Yes.

04:52:10 5 Q. You submitted two witness statements in this
6 arbitration. True?

7 A. Yes.

8 Q. Your first witness statement was submitted on
9 September 30, 2022, yes?

04:52:30 10 A. Yes.

11 Q. So a little more than four years after the 2018
12 invasion that you describe in that statement, correct?

13 A. Yes.

14 Q. When you composed that statement, you
04:52:44 15 encountered numerous instances where you had no
16 supporting documents related to the testimony that you
17 were giving, yes?

18 A. It was what I -- yes, but it was my knowledge
19 of things from talking to my workers, talking to friends
04:53:05 20 in Jinotega that have seen things happen. Such as
21 Leónidas Centeno, the Mayor of Jinotega, giving money to
22 the people that invaded the farm and distributing
23 weapons.

24 Q. I appreciate that you have a lot to say. We
04:53:21 25 have a long way to go in this cross. I will just ask

04:53:24 1 you -- I'm going to ask you a question, I will ask that
2 you answer my question. You'll have plenty of time with
3 your lawyers after I'm done to give any other color that
4 you think is relevant. Is that fair?

04:53:38 5 Mr. Rondón, is that fair?

6 A. Yes.

7 Q. Great.

8 So after you issued your witness
9 statement, you came across some documents that refreshed
04:53:54 10 your recollection about the content of your first
11 witness statement. True?

12 A. True.

13 Q. And by the time you submitted your second
14 witness statement in October 2023, you made several
04:54:08 15 corrections to your original testimony. True?

16 A. False. I did not make corrections. There were
17 clarifications that were made in the second witness
18 statement, the Reply.

19 MR. MOLINA: Ricky, do you mind putting up
04:54:27 20 Mr. Rondón's second witness statement, and if you could
21 go to paragraph 19, please.

22 Q. Do you see the header that says III? Do you
23 see that, Mr. Rondón?

24 A. Let me get to my --

04:54:52 25 Q. Sure.

04:54:53

1 A. Yes, I do.

2 Q. You see that it's titled "Corrections to my
3 earlier witness statement"?

4 A. That's correct.

04:55:01

5 Q. Now, these corrections, using your word,
6 they're listed under paragraph 23 of the statement.
7 True?

04:55:32

8 MR. MOLINA: Ricky, do you mind on the
9 screen, do you mind just showing the next page? That
10 would be nice.

11 A. Do you want me to read item 23?

12 Q. Only to the extent you think you need to read
13 it. My question is simply under paragraph 3,

04:55:50

14 specifically subsections (a) through (o), you identify
15 15 instances where you wanted to correct something you'd
16 said in your first witness statement. True?

17 A. (a)?

18 Q. Through (o).

19 A. Yeah.

04:56:51

20 Q. The answer is yes?

21 A. Repeat the question, please.

22 Q. The question is you identified the 15 instances
23 where you had corrected your testimony from your first
24 witness statement in subsections 23 (a) through 23(c).

04:57:09

25 Yes?

04:57:09 1 A. Yes. It was clarified better.

2 Q. At the end of the day, we're all human, and
3 sometimes our memory fails us, correct?

4 A. Correct.

04:57:24 5 Q. And having contemporaneous documents is
6 preferable because that way we don't have to rely on our
7 memories, yes?

8 A. Yes.

9 Q. Now, in your first witness statement, it was
04:57:39 10 submitted --

11 MR. MOLINA: Yes, thank you, Ricky. You
12 can take it down.

13 Q. Your first witness statement was submitted with
14 Riverside's Memorial, yes?

04:58:00 15 A. I don't understand your question, Riverside
16 Memorial.

17 Q. Do you see the front page of your first witness
18 statement, CWS-01?

19 A. Yes, I do.

04:58:11 20 Q. Do you see that the title says "Witness
21 statement - Carlos J. Rondón - Memorial"?

22 A. Yes, I do.

23 Q. You're familiar with the Memorial that
24 Riverside submitted on September 30, 2022, yes?

04:58:27 25 A. Yes.

04:58:28 1 Q. You're one of the operating managers, as we've
2 established. I assume you've read that Memorial, yes?

3 A. Yes.

4 MR. MOLINA: Could we go to paragraph 10
04:58:47 5 of the Memorial, Ricky? Of the Memorial. Thank you.
6 Do you mind just going to the first page just so we can
7 establish what this document is? Ricky, do you mind
8 just going to the first page of this pdf? I'm sorry.
9 There you go.

04:59:17 10 Q. Mr. Rondón, there's a screen in front of you.
11 This will not be -- I do not believe you have a copy of
12 the pleadings printed in front of you, but we do have a
13 screen in front of you where we're going to be showing
14 you documents that are not your witness statements.

04:59:33 15 Do you see on the screen the document that
16 we're displaying?

17 A. Yes, I see it.

18 Q. Just for the record, this is the Memorial of
19 the investor dated October 21, 2022, yes?

05:00:00 20 A. I don't have a copy of it, but that -- you
21 know, apparently it is.

22 Q. So the investor in this case is Riverside
23 Coffee, yes?

24 A. Yes.

05:00:13 25 MR. MOLINA: Could you go to paragraph 10

05:00:15 1 now, Ricky? Thank you. Do you mind just blowing it up
2 so that everyone can see it a little bit better? Thank
3 you.

4 Q. Do you see on the screen paragraph 10? And I'm
05:00:32 5 just going to read it for the record. It says:

6 "In summary, INAGROSA management informed
7 the National Police of suspicious activity around its
8 lands in the days before the first invasion, which
9 occurred on June 16, 2018, by unlawful invaders led by
05:00:49 10 armed paramilitaries."

11 Do you see that?

12 A. I see it.

13 MR. MOLINA: And now, Ricky, do you mind
14 going to paragraph 11?

05:01:02 15 Q. Now, in paragraph 11, the investor, i.e.
16 Riverside, clarifies:

17 "The term 'paramilitary' refers to
18 organized invaders who acted at the behest of Nicaragua
19 to carry out the government's political objectives. The
05:01:19 20 paramilitaries are part of the Nicaraguan State. The
21 paramilitaries are rewarded from the proceeds of their
22 unlawful pillaging. Paramilitaries are armed units led
23 by a commander ('Comandante'). The Comandante leads the
24 paramilitary unit based on instructions from the
05:01:38 25 Nicaraguan government, including the elected government

05:01:41 1 leaders and the police."

2 Do you see that?

3 A. Yes.

4 Q. So according to the definition on the -- that
05:01:50 5 you see on the screen and that I just read into the
6 record, paramilitaries are individuals who act under the
7 instruction of a government. Is that your understanding
8 as well?

9 A. It is.

05:02:04 10 Q. And it's your understanding also that
11 paramilitaries carry out government-backed objectives,
12 yes?

13 A. It is.

14 Q. And these are the people -- according to
05:02:15 15 paragraph 10 that we just read into the record a few
16 minutes ago, these are the people that the investor says
17 invaded the Hacienda Santa Fé in June 2018, yes?

18 A. It is.

19 Q. Do you happen to know how many times the
05:02:32 20 investor, Riverside Coffee, uses the word "paramilitary"
21 or some variation in this 300-page Memorial?

22 A. I did not count them.

23 MR. MOLINA: Do you mind, Ricky, just
24 control F?

05:02:56 25 Q. Do you see on the screen it's -- can you -- I'm

05:02:59 1 not asking you to do math, but well over 300 times?

2 A. It says 305.

3 Q. That's for "paramilitaries," yes? And then
4 underneath it says 76 for "paramilitary," correct?

05:03:18 5 A. Yes.

6 MR. MOLINA: Thank you. You can take that
7 down.

8 Q. Consistent with what we just read, in your
9 first witness statement you testified that the
10 individuals who invaded your Hacienda in 2018 were
11 government-backed paramilitaries, yes?

05:03:30

12 A. Yes.

13 Q. And you've already just explained that you
14 share -- or that you agree with the definition of
15 paramilitary that Riverside Coffee placed in its
16 Memorial, yes?

05:03:47

17 A. Yes.

18 Q. And, in fact, you used the term paramilitary
19 numerous times throughout your first witness statement.

05:04:02

20 True?

21 A. True.

22 Q. But in your second witness statement, you made
23 a correction about your earlier use of the term

24 paramilitary. Let's go to paragraph 23(a) of your

05:04:17

25 second witness statement. It's on the screen, but I

05:04:29 1 know that you have it in front of you. Let me know when
2 you're ready, Mr. Rondón.

3 A. Yes.

4 Q. Here, you thought it was important in your
05:04:59 5 second witness statement to clarify what you meant by
6 the term "paramilitary."

7 Do you see that?

8 A. Yes.

9 Q. In fact, you say that you used the term
05:05:19 10 "paramilitary" in your first witness statement
11 interchangeably to mean an armed invader or occupier.
12 Do you see that?

13 A. Yes.

14 Q. Then you say you do not ascribe any other
05:05:32 15 special meaning to that term. Do you see that?

16 A. It's what it means.

17 Q. But you don't say anywhere in this 23(a) and
18 what we're looking at, the screen, you don't say here
19 that, to you, a paramilitary is someone who's backed by
05:05:51 20 the government, right?

21 A. Can you repeat your question?

22 Q. Sure. I'm just asking, you thought it was
23 important to clarify what you meant by "paramilitary" in
24 this paragraph. My only question to you is in this
05:06:20 25 clarification, you do not state anywhere that you

05:06:24 1 understand a paramilitary to be backed by the
2 government. True?

3 A. It's a matter of what understanding you want to
4 give it.

05:06:36 5 Q. I'm just asking what the words that you wrote
6 in this second witness statement say.

7 Do you say here that the government backs
8 paramilitaries?

9 A. Did I say that the government backed
05:06:49 10 paramilitaries?

11 Q. That's the question.

12 A. It says interchangeably I have used it. Yes, I
13 have used it.

14 Q. That's not my question, Mr. Rondón. It's a
05:07:09 15 very simple question. In this paragraph, do you
16 indicate that the paramilitaries are government-backed
17 individuals, yes or no?

18 A. I didn't understand your question.

19 Q. Do you state anywhere in this paragraph that a
05:07:25 20 paramilitary is, by definition, someone who carries out
21 a government's political objectives?

22 A. Yes, that's the case.

23 Q. Is that what you say in this paragraph?

24 A. It says "I used the term 'paramilitary'
05:07:50 25 interchangeably for an armed invader or occupier in my

05:07:54 1 first witness statement."

2 Q. Is the word "political" anywhere in this
3 paragraph?

4 A. It's not.

05:08:01 5 PRESIDENT: I think we get the point,
6 Mr. Molina.

7 MR. MOLINA: Now, you can take that down.
8 Thank you.

9 Q. After this correction, you stopped describing
05:08:11 10 the individuals who invaded your Hacienda as
11 paramilitaries, right?

12 A. They have been described what they were.

13 Q. In fact, the paragraph that we just saw on the
14 screen is the only time in your second witness statement
05:08:43 15 that you used the word "paramilitary", correct?

16 A. Yes. They are the ones that confiscated
17 Santa Fé.

18 Q. In your second witness statement, you also
19 stopped suggesting that the invaders were backed by the
05:09:02 20 government. Isn't that true?

21 A. Yes, and heavily armed.

22 Q. In your first witness statement -- now I'm
23 going back to your first witness statement -- you had
24 said that the government had "sent" these so-called
05:09:15 25 paramilitaries. Do you remember that?

05:09:18

1 A. Yes.

2 Q. You also said in your first witness statement
3 that the mayor of Jinotega had "ordered" these
4 paramilitaries. True?

05:09:28

5 A. Yes.

6 Q. And by the way, just for the record, I'm
7 quoting from the witness statement -- the first quote
8 about "sent" is in paragraph 76 of CWS-01, and this
9 quote about the mayor of Jinotega "ordering" -- or that
05:09:48 10 he had ordered the paramilitaries, is in CWS-01,
11 paragraph 80.

12 In paragraph 83 of your first witness
13 statement, Mr. Rondón, you repeat an allegation that the
14 invasion was the result of the Nicaraguan government
05:10:08 15 trying to "confiscate" your Hacienda. True?

16 A. Correct. Confiscate the farm, what they did.

17 Q. And in your first witness statement you also
18 repeat an allegation that the Nicaraguan government
19 wanted to use your Hacienda as "its base of operations."

05:10:34

20 Yes?

21 A. Yes, it was a base of operation.

22 Q. And that's in paragraph 84 of your first
23 witness statement.

24 Now, the last four questions where I
05:10:46 25 pointed you to specific parts of your first witness

05:10:48 1 statement, just for the record, you don't repeat any of
2 those allegations in your second witness statement.

3 True?

4 A. They were already in the first one.

05:11:01 5 Q. So I'm just going to need a yes or no,
6 Mr. Rondón.

7 As you sit here today, is it your
8 testimony that the Nicaraguan government sent
9 paramilitaries, as defined by Riverside Coffee in
05:11:15 10 paragraph 11 of the Memorial, to invade your Hacienda in
11 2018?

12 A. My knowledge is that the government of
13 Nicaragua did send them to confiscate our farm.

14 Q. Thank you, Mr. Rondón.

05:11:32 15 A. Heavily armed.

16 Q. Mr. Rondón, you're aware that in this
17 arbitration, Nicaragua takes the position that the 2018
18 invasion of Hacienda Santa Fé had nothing to do with
19 government-backed paramilitaries, yes?

05:11:46 20 A. That's what the government says, yes.

21 Q. You understand that Nicaragua takes the
22 position in this arbitration that the 2018 invasion of
23 Hacienda Santa Fé was just the most recent iteration of
24 a longstanding property dispute between your family and
05:12:03 25 members of a private cooperative. You understand that?

05:12:09 1 A. My family never had anything to do with any
2 co-op. The government of Nicaragua had a dispute with
3 them as to where to locate them for land purposes. We
4 never sat down with either group, government or the
05:12:28 5 occupiers. After they started doing things that were
6 inappropriate in our views, we were advised by people in
7 the government of Nicaragua and also in the US embassy
8 to follow the legal procedures of the law in Nicaragua
9 in the 1990s, which we did.

05:12:55 10 This led to courts ordering the eviction
11 of the squatters or people that occupied it, which was
12 carried out by us in a peaceful manner starting in 2003.

13 Q. Thank you, Mr. Rondón.

14 My next question is you understand that in
05:13:19 15 this arbitration, Nicaragua takes the position that
16 Hacienda Santa Fé had been invaded in the 1990s by
17 members of a Cooperativa El Pavón. You understand that?

18 A. The government of Nicaragua issued a letter to
19 those people saying that they could go to Santa Fé, that
05:13:43 20 the government was going to negotiate the purchase of
21 the land from the owners.

22 We never entered into any negotiations,
23 and there was never any dispute or any links between us
24 and, you know, the poor people that were being used by
05:14:00 25 the government of Nicaragua.

05:14:01 1 Q. I appreciate again, Mr. Rondón, that you have a
2 lot to say.

3 My question was just very specific. I
4 will give you the courtesy of answering the question to
05:14:10 5 the best of your ability, but I would just ask that you
6 answer my question.

7 Just very quickly, in your first -- sorry,
8 in your second witness statement, in paragraphs 29 and
9 32, you address these allegations from -- or the
05:14:25 10 positions taken by Nicaragua in this arbitration, and
11 you say that there was no invasion of Hacienda Santa Fé
12 in the 1990s, right? That's your testimony?

13 A. The definition of invasion is somebody coming
14 in armed. Those people were taken there. So they have
05:14:47 15 occupied something that did not belong to them.

16 Q. So you didn't think of them to be invaders,
17 correct?

18 A. They were not invaders because they didn't have
19 weapons. They were poor people that were being used.

05:14:59 20 Q. And you take the position that they were there
21 and they were allowed to stay by your family until they
22 began -- and these are your words -- land trafficking,
23 correct?

24 A. That is correct. There is a page in the bundle
05:15:12 25 that you sent late, signed by Francisco Rivera Aguirre,

05:15:20 1 the presidential delegate for the agrarian problems of
2 the Nicaraguan resistance. He conducted an inspection
3 in Santa Fé, submitted that report. In it, he states
4 that what he found there were a few huts like what we
05:15:42 5 knew was going on. And he summoned some people to go to
6 the government office in Jinotega, and he also found a
7 name of a guy, a fellow by the name of Gutiérrez who was
8 the saddle maker occupying land inside our farm that had
9 bought it from somebody else. He stated that was land
05:16:10 10 trafficking going on inside of Santa Fé.

11 Q. What I'd like to do now --

12 MR. MOLINA: Ricky, do you mind putting up
13 what's been marked as Exhibit R-177. Specifically go to
14 Tab 8, the English translation, please. Thank you.

05:16:33 15 Q. Mr. Rondón, what you're looking at on the
16 screen is a document that appears to be a letter from
17 INAGROSA dated August 11, 2000 to the office of the
18 rural title registration in Managua. Do you see that?

19 A. That is correct.

05:16:52 20 Q. And as you understand, this is an English
21 translation of the letter that you originally wrote in
22 Spanish, yes?

23 A. Yes. I would like to see the Spanish version.

24 Q. Sure. We can do that.

05:17:08 25 MR. MOLINA: Ricky, could you do -- I

05:17:09 1 don't know if you can do this. I'm testing your skills.
2 Do you think you can go side by side? That way everyone
3 can follow along. If you go further down on the right
4 part of the screen, please, back to -- and we get to
05:17:34 5 that letter? I think it's tab 8. Give us one second
6 here.

7 Q. Do you see on the right the original Spanish
8 language version of this letter?

9 A. Can you make it larger, the letters?

05:18:45 10 Yes, I see it now.

11 Q. You wrote this letter, right?

12 A. I signed that letter, and I wrote it.

13 Q. If you could go down to the signature page of
14 the original, it says -- that's your signature, right,
05:19:03 15 on the left side?

16 A. Yes, and my wife's signature on the right.

17 Q. Great.

18 MR. MOLINA: You can go back up to the
19 top.

05:19:12 20 Q. So you're familiar with this letter, right?

21 A. I am familiar with the letter.

22 Q. So you know that it says, if you go -- I don't
23 know how you want to do this. You're testifying in
24 English. I also happen to speak Spanish. If you want
05:19:33 25 to, I can ask you questions about the English

05:19:36 1 translation or the Spanish original. What's easiest for
2 you?

3 A. It doesn't matter, but I like to see the
4 content in Spanish, and then I will translate what it
05:19:47 5 means to me.

6 Q. That's great.

7 A. Since I wrote the letter.

8 Q. Sounds good.

9 Okay, if you look in the English
05:19:56 10 translation, and you're also happy to look at the
11 Spanish version, you'll see that there's a paragraph
12 that starts with the words "Immediately after." Do you
13 see that?

14 A. Yes, I see it.

05:20:13 15 Q. Do you see that you say here that there was a
16 group of invaders that went to take over your property?
17 Do you see that?

18 A. That's correct.

19 Q. When you say your property, you mean Hacienda
05:20:24 20 Santa Fé?

21 A. Yes.

22 Q. So these invaders, as you call them, you say
23 that they had been damaging your property and there was
24 even an allegation that someone was murdered. Do you
05:20:40 25 see that?

05:20:41 1 A. I beg your pardon. It's not an allegation.
2 Our foreman was assassinated. Yatán Arévalo. It's in
3 the registry of the police of Jinotega.

4 Q. Do you see here also it says that there were
05:20:55 5 threats and that you, as in INAGROSA, could not regain
6 total control and security over the property? Do you
7 see that?

8 A. That is correct. By that time, the year 2000,
9 when it's dated, we had planted over 2,000 manzanas of
05:21:13 10 premium coffee in Hacienda Santa Fé and our workers were
11 going around the huts where the occupiers were and so we
12 were having a bit of friction with them. Therefore, we
13 pushed for the court procedures to speed up, which it
14 did. The order came for the eviction and it started in
05:21:40 15 2003.

16 Q. But you see here there's no allegation about
17 land trafficking, correct?

18 A. In Mr. Rivera's inspection is the issue of land
19 trafficking. I did not have to include it in this
05:21:53 20 letter. I have the knowledge. The people at the
21 government had the knowledge. They were only dragging
22 their feet.

23 Q. So the answer is no, it's not in this letter?

24 A. I don't believe so. However, it talks about
05:22:06 25 the total destruction of the infrastructure at the farm.

05:22:12 1 Total.

2 Q. That's right. You were complaining in this
3 letter that you felt that your property had been
4 invaded, and you wanted these people out, yes?

05:22:24 5 A. That's correct.

6 Q. In fact, you, on behalf of INAGROSA, brought a
7 case to court to get an eviction order to get these
8 people out.

9 A. We obtained an eviction order in the Nicaraguan
05:22:37 10 court system to get those people out.

11 Q. Because you understood that if you want to get
12 people out of your property, you should go to the court
13 and get an eviction order, yes?

14 A. We did.

05:22:49 15 Q. And, in fact, further down --

16 MR. MOLINA: Ricky, I'm going to need you
17 to go to the second page of the English translation.
18 There you go.

19 Q. So at the top of the English translation, which
05:23:01 20 is actually at the bottom of the Spanish translation, it
21 says that you're making a multimillion investment which
22 involves the construction of infrastructure, roads,
23 coffee plantations and other non-traditional crops. Do
24 you see that?

05:23:21 25 A. That's correct.

05:23:21 1 Q. So you're telling the government, I need these
2 people out because I'm trying to grow this business and
3 make multimillion-dollar investments, yes?

4 A. That is correct.

05:23:31 5 Q. In fact, also further down in this same
6 paragraph, when you talk about these non-traditional
7 crops, you specifically say -- wait, I'm sorry. Yes.
8 You say at the end that in order for you to be able to
9 make these investments, you need the property "free of
05:23:56 10 invaders."

11 Do you see that?

12 A. That is correct.

13 Q. And, by the way, when you mention these
14 investments, you're referencing your investor, Riverside
05:24:06 15 Coffee, yes?

16 A. Yes.

17 Q. Because by that time they were onboard, and
18 they basically told you at that time we're not going to
19 invest until you get these people out of Hacienda
05:24:17 20 Santa Fé. True?

21 A. That's farfetched by imagination, and it is not
22 true. It is me. I myself determined that we could not
23 keep on having friction with the people that were
24 occupying that part of the farm, as we were expanding
05:24:39 25 the planting of coffee. So we wanted the people who

05:24:45 1 were illegally occupying that land to be evicted.

2 Q. Correct. Now if we can go to Tab No. 9 -- I
3 think it's tab 9. Yes, tab 9 of this document, R-177,
4 please.

05:25:08 5 MR. MOLINA: And I'm going to ask you,
6 Ricky, for the same thing, if you can possibly put up
7 the English translation and the original Spanish on the
8 same screen, please. Tab 9.

9 Q. All right, Mr. Rondón. What I'm showing you
05:25:38 10 appears to be a letter dated September 8, 2000 from
11 INAGROSA, again to the Office of Rural Title
12 Registration. Do you see that?

13 A. Yes, I see it.

14 Q. Are you familiar with this letter?

05:25:50 15 A. Yes, I am familiar with the letter.

16 Q. You signed the letter, right?

17 A. Yes, I did.

18 MR. MOLINA: For the record, Ricky, do you
19 mind going to the signature block so we can confirm? It
05:26:00 20 will be in the original Spanish. Thank you.

21 Q. That's your signature, yes?

22 A. Yes.

23 Q. Now, in this letter you're saying --
24 essentially this is now about, what, a month or so after
05:26:17 25 the original letter?

05:26:18

1 A. Yes.

2

Q. And now you're saying I want to confirm what we've discussed since my original letter. Is that fair?

3

4 A. Yes.

05:26:28

5 Q. And here you mention agreements that you believe were entered into between INAGROSA and the Office of Title Registration, yes?

6

7 A. Can you bring it down so I can see the context in which you're talking about? *(Pause)*

8

05:27:14

9
10 Yes, it says that the court ordered their
11 eviction. We kept the US embassy abreast of the
12 situation to the point that it took the government of
13 the United States, using its embassy in Nicaragua and
14 the Ambassador Garza, to write a letter as to ask him in
15 nice terms what's taking so long.

16

17 Q. Right. Because these people had been in your
18 property, according to the first letter we saw, since
19 1990, yes?

20

05:27:52

21 A. Those people came and went and they had been in
22 Santa Fé since late 1990. December, more likely, 1990.

23

24 Q. But we just saw first the letter from August,
25 and that's not what that said. If you want to, we can
pull it up again.

26

05:28:07

27 A. The letter from August is a letter that I
signed. It's got nothing to do -- it's the continuation

28

05:28:10 1 of this, but what it was is to speed up the process. In
2 agriculture, it's not a factory that you turn on and off
3 a button. You go with the seasons.

4 Q. Right.

05:28:25 5 A. So you have to take advantage of the particular
6 season that you're using for the particular jobs that
7 you're doing. And they were delaying our work at the
8 farm.

9 Q. Right. You were getting impatient at this
05:28:36 10 point, yes?

11 A. Not impatient. I was amazed at the inability
12 of the Nicaraguan government to speed up the eviction
13 process.

14 Q. Right. And in this letter, you not only send
05:28:48 15 this letter to the Office of Title Registration, you're
16 also copying the President of Nicaragua, yes?

17 A. Yes, I did.

18 Q. You're also copying the economic counsel from
19 the US embassy in Nicaragua, yes?

05:29:02 20 A. Yes. He asked me to.

21 Q. That's Mr. Anthony Interlandi?

22 A. Mr. Interlandi, yes.

23 Q. You're copying the president delegate for
24 agrarian affairs of the Nicaraguan Resistance?

05:29:16 25 A. Francisco Rivera, yes.

05:29:17 1 Q. The Minister of Finance?

2 A. Yes.

3 Q. You're getting a lot of different ministries
4 involved in your dispute --

05:29:22 5 A. It's not a dispute. I will beg your pardon.
6 It's not a dispute. That is only in your mind. I never
7 sat down with the people that occupied the farm. What
8 this letter means is that we were going to help the
9 government to expedite the eviction process. And by it,
05:29:47 10 it would mean that we would pay for (a) whatever
11 improvement they had in their huts and we would pay for
12 the transportation, one-way ticket out of the farm.

13 Q. I understand you don't want to call it a
14 dispute, so let me try to break it down into even
05:30:00 15 simpler terms.

16 You wanted those people out of your
17 property, yes?

18 A. Definitely.

19 Q. They did not want to leave your property, yes?

05:30:09 20 A. After the police accompanied the court order
21 evicting them, they met with them and they started
22 getting out of the property.

23 Q. Mr. Rondón, I've been very, very lenient in
24 letting you talk. I've asked you a very specific
05:30:31 25 question.

05:30:31 1 Did the people in your property that
2 you're trying to evict as of this time frame, did they
3 want to stay in your property, yes or no?

4 A. See, you're generalizing, and I happen to know
05:30:45 5 that there were people that started leaving the farm
6 when they knew that they were going to be evicted. And
7 the police went to the farm. That's what I'm trying to
8 explain you.

9 Not everybody wanted to stay in the farm,
05:30:58 10 no. Some people took up the option of getting out on
11 their own. Some other people took the option of being
12 paid while we paid them for the transport to go to where
13 they were being relocated. And this was done according
14 with the law in Nicaragua, our attorney present,
05:31:23 15 verifying that they were being evicted, that they have
16 left, and they would be given the aid that we have
17 promised them.

18 Q. Right. Okay. If you go to Tab 13 of this
19 document.

05:31:37 20 MR. MOLINA: Ricky, I'm going to have you
21 do the same thing, please. I know it's a pain, but I
22 appreciate it.

23 Q. All right. Mr. Rondón, I'm showing you a
24 document, a letter from the US embassy to the Office of
05:31:59 25 Rural Title Registration dated February 2, 2001. Do you

05:32:03 1 see that?

2 A. I do see it.

3 Q. And this is signed -- if you go to the Spanish
4 original, you'll see it's signed by a Mr. Anthony

05:32:17 5 Interlandi. Do you see that?

6 A. Yes.

7 Q. He's the person that at that time you were
8 discussing this issue you had with people on your
9 property, yes?

05:32:25 10 A. I was speaking -- I wasn't discussing with
11 Mr. Interlandi. I was keeping abreast of the situation
12 at Hacienda Santa Fé.

13 Q. Right. And based on your conversations with
14 him, he thought it was important to write a letter to
05:32:40 15 this office on your behalf?

16 A. Yes, because later the US would use his good
17 offices to put pressure upon the government of Nicaragua
18 to expedite the eviction process.

19 Q. And this is dated February 2001, so this is
05:32:57 20 now, what, a good six months or more since you initially
21 complained in your first letter, yes?

22 A. That is correct.

23 Q. And if you see here on the first paragraph, it
24 says that a major shareholder is a US citizen. That's
05:33:12 25 you, yes? You're the US citizen that he's referencing

05:33:18

1 here?

2

A. I don't know if it is me or not because I was not the main shareholder.

3

Q. That's --

05:33:26

4

A. It was Riverside.

5

Q. Okay. I'm just -- okay. Let me ask it differently.

6

A. Riverside controlled INAGROSA.

7

Q. Please let me ask my question.

05:33:34

8

That's your name that he puts on the second line of this letter, yes?

9

A. That's correct.

10

Q. And it says, "Apart from coffee, Mr. Rondón wants to plant ferns to be exported to the United States."

05:33:46

11

Do you see that?

12

A. That is correct.

13

Q. Then he goes on to say: "He wants to sell in that growing and profitable market."

14

Do you see that?

05:33:56

15

A. Yes, that's correct.

16

Q. So he's saying that, based on discussions with you, you were trying to grow ferns in Nicaragua out of Hacienda Santa Fé, yes?

17

A. Yes.

05:34:07

05:34:08 1 Q. And you wanted to export those ferns to the
2 United States, yes?

3 A. Wrong. The market for ferns was the
4 Netherlands, for distribution in Europe.

05:34:19 5 Q. So Mr. Interlandi just got that part wrong?

6 A. Yes.

7 Q. But he did say that it's a growing and
8 profitable market. Was that your opinion of ferns at
9 the time?

05:34:27 10 A. At the time it was a very profitable market.

11 Q. So let me get this straight. At that time it's
12 your testimony that INAGROSA was in the coffee business,
13 yes?

14 A. That's correct.

05:34:37 15 Q. You mention that by this point, INAGROSA had
16 already purchased the Hacienda Santa Fé and cultivated
17 hundreds of hectares of coffee, yes?

18 A. Premium coffees.

19 Q. Premium coffees. And, of course, coffee is a
05:34:52 20 very common crop in Nicaragua, correct?

21 A. The knowledge is very diffused in Nicaragua to
22 grow coffee.

23 Q. But you thought, I'm going to break the mold
24 and invest in a non-traditional crop, in this case
05:35:11 25 ferns, yes?

05:35:14 1 A. I don't think like you do. I was a different
2 approach, different thinking of why I reached the
3 decision to go into the leatherleaf ferns. The neighbor
4 to the south of us, Costa Rica, was the largest exporter
05:35:32 5 to Europe of leatherleaf ferns from Costa Rica.

6 Since we worked with a lot of
7 Costa Ricans, agronomists and people selling us
8 agrochemicals, they told me, Carlos, you have
9 leatherleaf fern running wild in your farm. Why don't
05:35:54 10 you grow it under controlled conditions and export it to
11 Europe, like in Costa Rica.

12 That caught my interest. So I went to
13 Costa Rica to see how is it that the markets worked at
14 the production level and at the export level. And so we
05:36:17 15 decided, well, we're going to go.

16 For that, I approached the office of the
17 Overseas Private Investment Corporation of the United
18 States government. After a process where they
19 investigated us, Riverside and INAGROSA, and the market
05:36:38 20 for leatherleaf ferns, we were approved for a financing
21 of \$6.3 million for a project of about \$9 million.

22 Q. That sounds impressive.

23 Did you ever get to export ferns to the
24 Netherlands?

05:36:56 25 A. We withdrew before starting the project.

05:36:58 1 Q. Were you able to export ferns anywhere out of
2 Hacienda Santa Fé?

3 A. We withdrew before starting the project.

4 Q. So in this letter, Mr. Interlandi is saying --
05:37:13 5 I'm looking at the third paragraph -- he says,
6 "Unfortunately Mr. Rondón faces another obstacle to
7 start his new business."

8 Do you see that?

9 A. We're talking -- we're dealing in two different
05:37:34 10 times.

11 Q. I'm just asking if you see that?

12 A. I saw it, but let me clarify to you. You're
13 trying to mix it up. This is 2001. When I signed the
14 financing for the leatherleaf project, that was 2005.
05:37:53 15 There were no longer any occupiers in Hacienda Santa Fé.
16 That was a dead issue.

17 Q. I literally just asked you if that's what it
18 says on the page. I'm going to get to a second
19 question. I would appreciate, just answer my question.

05:38:10 20 Then it says that you could not pursue
21 this "new business" because there are people who have
22 illegally occupied your property. That's what he says?

23 A. That is correct, because I was going to insure
24 the project with OPIC, and OPIC requested to me that
05:38:32 25 those people be out of the farm. We had started talking

05:38:35 1 to OPIC about the project.

2 Q. So here he says there's that court decision,
3 that eviction order that you've already obtained and
4 that basically this gentleman is asking this office to
05:38:46 5 enforce that order on your behalf, yes?

6 A. I'm asking Mr. Marco Centeno to do what an
7 efficient government should have done a long time ago.

8 Q. Thank you.

9 MR. MOLINA: Do you mind putting up
05:39:01 10 Tab 25, Ricky, please? Thank you, Ricky.

11 Q. All right. Mr. Rondón, you're now being shown
12 Tab 25 of R-177. It's a letter dated September 18, 2001
13 from INAGROSA. Do you see that?

14 A. Yes, I do.

05:39:41 15 Q. Are you familiar with this letter?

16 A. Yes.

17 Q. You signed it, yes?

18 A. I did.

19 Q. And here, you're communicating to Mr. Chavarria
05:39:52 20 that there is willingness on behalf of INAGROSA to help
21 relocate the individuals who were at your property,
22 correct?

23 A. That's correct.

24 Q. So, yes, you wanted them out, but you
05:40:07 25 understood that they couldn't just be thrown on the

05:40:10 1 street; they needed to be relocated, correct?

2 A. The relocation issue wasn't my issue. It was
3 the government's issue. What I wanted to do was to help
4 poor people go to a new place where the government is
05:40:24 5 going to title the land for them.

6 Q. And you wanted to -- you saw that assisting the
7 government in that relocation effort was the proper
8 thing to do at that time, yes?

9 A. It was helping myself so that I can use my own
05:40:40 10 property to the fullest potential.

11 Q. And by this point -- again, we're dated
12 September 18, 2001 -- so you're now more than a year
13 into this campaign to have the government help you get
14 these people out, yes?

05:41:03 15 A. Yes.

16 MR. MOLINA: Ricky, why don't you put up
17 Tab 27 of R-177, please?

18 Q. Mr. Rondón, you're being shown a letter dated
19 February 17, 2003 from INAGROSA. Do you see that?

05:41:36 20 A. Can you make the letters bigger?

21 Q. Can you see that now?

22 A. Yes, I do.

23 Q. You wrote this letter, yes?

24 A. I did.

05:42:01 25 Q. So you're familiar with it?

05:42:02 1 A. Yes.

2 Q. And here you're writing to the gentleman from
3 the Ministry of Finance and Public Credit, correct?

4 A. Correct.

05:42:10 5 Q. And now we're in 2003. So now we're roughly a
6 year and a half into your campaign to get people out of
7 Hacienda Santa Fé. True?

8 A. That's correct.

9 Q. And here you're telling him that -- you're
05:42:23 10 basically giving a status on this "Plan Techo" program.
11 Do you see that?

12 A. That's correct.

13 Q. You're saying INAGROSA is committed to this
14 program, correct?

05:42:35 15 A. It is committed to getting the people out of
16 there and helping them get to where they were going.

17 Q. And, again, these are people who you said have
18 been harming the property and have even murdered one of
19 your employees, right?

05:42:57 20 A. You're mistaken. The people that murdered our
21 foreman was a group of armed people that had fought in
22 the Nicaraguan civil war in the 1980s, by one of
23 those -- Comandante Nortiel, who went around killing
24 people in other farms and destroying infrastructure.

05:43:20 25 Q. So here -- go ahead.

05:43:21 1 A. And he's the one that assassinated our foreman.
2 Q. So here you're saying the only thing left to do
3 would be to persuade and relocate these people. Do you
4 see that?

05:43:42 5 A. Let me see the date again.
6 Q. It's the third paragraph, the one that starts
7 with "Once the location issue."
8 A. Can you bring it down to see the date?
9 Q. You want to see the date?

05:43:50 10 A. The date. 2003, right?
11 Q. Yes.
12 A. Yes, February 2003.
13 Q. Yes. Do you see in the third paragraph, the
14 one that starts in English, "Once the location"? Do you
05:44:03 15 see that?
16 A. Yes, I see it.
17 Q. So what you're telling the gentleman from the
18 Ministry of Finance and Public Credit is that there's
19 now a location that's been identified, and all that's
05:44:29 20 left to do is persuade and relocate these people. Do
21 you see that?
22 A. That is correct.
23 Q. And by "these people," you're referring to the
24 same people that you've been complaining about for about
05:44:39 25 18 months at this point, yes?

05:44:40 1 A. That's correct.

2 Q. These are the people who are living on Hacienda
3 Santa Fé property, yes?

4 A. Yes, occupying it illegally.

05:45:06 5 MR. MOLINA: You can take that down. Now
6 I'm going to ask Mr. Ricky here to put up Exhibit R-61,
7 please. And if you don't mind, we also have a Spanish
8 version. So, Ricky, I'm sorry, but I'm going to have
9 you do what you do.

05:45:44 10 Q. Okay. Mr. Rondón, we are showing you what has
11 been marked as Exhibit R-0061. On the right side you
12 have the original version in Spanish. On the left side
13 you have the translated version in English. Do you see
14 that?

05:46:10 15 A. Yes. What that letter says to me is that the
16 people were agreeing to leave, and they wanted somebody
17 else to do some evaluation in order to get more money to
18 get out of the property.

05:46:28 19 Q. I haven't asked you a question yet about the
20 contents, but I will get there.

21 This is a letter dated October 19, 2003.
22 Do you see that?

23 A. I see it.

24 Q. And it's addressed to the Rondón family, yes?

05:46:39 25 A. Yes.

05:46:39 1 Q. That's your family?

2 A. Yes.

3 Q. And this is from the same gentleman that we saw
4 in the previous letter from the Ministry of the Hacienda
05:46:50 5 y Crédito Publico?

6 A. Yes.

7 Q. Here he's telling you -- this is now October,
8 so now we're almost more than two years at this point
9 after your initial letter -- actually, I'm sorry, more
05:47:04 10 than three years after your initial letter from
11 August 2000 that we saw a few minutes ago, correct?

12 A. Correct.

13 Q. So here he's telling you that -- filling you in
14 on the developments on this relocation effort, correct?

05:47:45 15 A. He says that is the will of the government to
16 give a quick answer to the situation presented. And
17 they're asking to cease the legal actions against the
18 people from -- occupying our land illegally that had
19 committed misdeeds against the Nicaraguan law, and they
05:48:13 20 were being arrested by the local police and taken before
21 the local judge.

22 And what they're asking is if we had -- I
23 don't control the judicial system in Nicaragua. I don't
24 control the police in Nicaragua, you know. There were
05:48:32 25 complaints of disagreements, of fights among themselves.

05:48:37 1 There was even, that I know, an assassination for one of
2 those people that were occupying the farm illegally at
3 an illegal bar.

4 Q. I have not asked you about any of that. I
05:48:51 5 really just want to get through this letter. I promise
6 you'll have an opportunity with your lawyer to go in
7 whatever discussion you want.

8 My question is simply in this letter,
9 which you say you recognize as a letter addressed to
05:49:05 10 you, this ministry is telling you that they're giving
11 you an update about the conflict, their word, between
12 Santa Fé and members of "Cooperativa El Pavón including
13 members of the Nicaraguan resistance."

14 You see that?

05:49:27 15 A. You don't give any credibility -- I see it, but
16 you don't give any credibility to the letter written by
17 Mr. Francisco Rivera where he says it's land trafficking
18 and he found huts, and very few of them were members of
19 the resistance.

05:49:42 20 Q. And I promise you, Mr. Rondón, again with your
21 lawyer you'll be able to put up that letter or whatever
22 letter you want. I'm asking about this letter. That's
23 what this letter says, right? A conflict between
24 Santa Fé and the Cooperativa El Pavón, yes?

05:49:56 25 A. It's the opinion of the gentleman that signed

05:49:58 1 the letter. However, we did not follow any of his
2 suggestions to assist the judicial -- the trial against
3 people that had committed misdeeds, crimes inside our
4 farm.

05:50:16 5 Q. Yeah. In fact, at the bottom of this letter,
6 and highlighted on the original, this individual is
7 telling the Rondón family, your family, to please let
8 the process play out, the relocation process, before you
9 continue trying to enforce this eviction order that
05:50:33 10 you've had for a few years by this point. True?

11 A. We had started the eviction process by then,
12 October 19, 2003. I would say about half of the illegal
13 occupiers of the farm had already left by that date. I
14 don't know what to tell you. But that's the truth.

05:50:59 15 Q. I would like for you to tell me the answer to
16 my question, which is that he's telling you to desist on
17 enforcing the eviction order against the members of the
18 cooperative who were on your property, yes?

19 A. I don't understand your question because people
05:51:23 20 were already being evicted. It's not like if it hasn't
21 started yet. He had started the eviction process.

22 Q. By this --

23 A. And the people that were being arrested is
24 people that committed simple crimes inside the farm.

05:51:37 25 Q. And by this point, these individuals who are

05:51:41 1 being evicted, or are about to be evicted, they don't
2 yet have a relocation, correct?

3 A. They did. They knew where they were going.
4 Because we transported some of them to a place in
05:51:57 5 San Miguelito, Department of Leon, Nicaragua.

6 Q. So it's your testimony today that every one of
7 the individuals who was either already evicted, or about
8 to be evicted as of this date, already had a piece of
9 land where they were supposed to go?

05:52:14 10 A. Yes. They knew where they were going.

11 Q. Why don't we go to R-36 -- and let me look at
12 the time.

13 MR. MOLINA: Mr. President, I think we
14 said 6:00 is the breaking point? I just want to make
05:52:30 15 sure that's correct?

16 PRESIDENT: That's right.

17 MR. MOLINA: So I'm going to put up one
18 more document, and then we can probably stop then.

19 PRESIDENT: Unless you can finish by 6:00.

05:52:42 20 MR. MOLINA: I doubt it.

21 Do you mind putting the Spanish original
22 on the right as well, Mr. Ricky?

23 Mr. Ricky, I'm showing you what has been
24 designated as Exhibit R-0036, and it is a newspaper
05:53:04 25 article from November 22nd, 2003. Do you see that?

05:53:11 1 MR. APPLETON: Excuse me, Counsel. Are
2 you asking your question to Mr. Ricky?

3 MR. MOLINA: Thank you. Thank you,
4 Mr. Appleton. This is what happens when you get late in
05:53:19 5 the day. Mr. Ricky, you don't have to answer that one.

6 Q. Mr. Rondón, I'm going to ask you. I'm showing
7 you what has been marked as Exhibit R-0036. It appears
8 to be a newspaper article dated November 22, 2003, yes?

9 A. Yes, that's from the disappeared newspaper in
05:53:42 10 Nicaragua that had pro tendencies for the Sandinistas.

11 Q. And this newspaper is titled El Nuevo Diario.

12 A. Yes. Long gone, yes.

13 Q. And the title of this in the original Spanish
14 is "A land that was destroyed in El Pavón," correct?

05:54:03 15 A. Yes.

16 MR. MOLINA: If you go to the second page,
17 Ricky, just for the record, the second page of the
18 English translation.

19 Q. The translation here is "scorched land in
05:54:16 20 El Pavón," yes?

21 A. That's what the journalist wrote on that
22 newspaper. The reporter.

23 Q. So you actually cite to this article in your
24 second witness statement, correct?

05:54:34 25 A. I think I did -- but there was also -- I never

05:54:36 1 went up there when those people were being evicted. I
2 never interacted with them. You must know that
3 journalism in Nicaragua at the time still had -- it
4 depends upon the color of the glass that you see
05:54:57 5 through.

6 Q. My question is simply are you familiar with
7 this article?

8 A. I'm familiar with the article.

9 Q. So you're aware that in this article it says
05:55:06 10 that you and your family and your company, alongside
11 with police forces and even a SWAT team, conducted an
12 eviction at Hacienda Santa Fé of the
13 Cooperativa El Pavón members, yes?

14 A. It's false. We didn't have any SWAT teams
05:55:27 15 there. Police in San Rafael del Norte will tell you
16 that there are only about, what is it, 7 to 12 policemen
17 stationed there. Where would you get a SWAT team from?
18 Special training, special equipment, special weapons.
19 That's what it is. That's what's called a SWAT team.

05:55:50 20 Q. Do you deny that --

21 A. I deny that --

22 Q. Mr. Rondón, we have a court reporter who's
23 taking our transcript. We have interpreters.

24 PRESIDENT: It's late in the day,
05:56:02 25 Mr. Rondón, but please listen to the question --

05:56:05 1 MR. RONDÓN: Yes, sir.

2 PRESIDENT: -- and answer the question the
3 best you can. In that way it will be faster and easier
4 for all of us.

05:56:15 5 MR. RONDÓN: Okay.

6 Q. This eviction that's reported in this article
7 did happen, yes?

8 A. I wasn't there. If the paper said that they
9 evicted some on that day, yes, because it had started

05:56:30 10 earlier.

11 Q. And you don't have any reason to deny that this
12 eviction was carried out by INAGROSA and police forces,
13 correct?

14 A. INAGROSA doesn't have authority. It is the
05:56:43 15 police that carries out the evictions, orders from the
16 court. INAGROSA only helped the people move their
17 belongings out.

18 Q. Right. So you got an eviction order in or
19 around 2000. You asked the government for help, and in
05:57:00 20 2003, the police enforced that order, yes?

21 A. Yes.

22 Q. In this article there are several allegations
23 about brutal force used during this eviction. Are you
24 familiar with that?

05:57:23 25 A. I read the article, and I know what it says.

05:57:27 1 But there was no brutal force employed there.

2 Q. You see there are pictures that are
3 accompanying this article that show certain damage
4 allegedly, according to this article, caused by the
05:57:41 5 eviction, yes?

6 A. I don't know what you refer to damages. The
7 damages were -- we were incurring the damages as the
8 owner of the land by illegal occupants.

9 MR. MOLINA: Ricky, if you can go on the
05:57:59 10 English translation, go to the first page. Maybe this
11 will be the easier way of doing it, and we'll finish up
12 here. I only have one or two more questions.

13 Q. You see that on the English translation -- you
14 can also try to read it in the Spanish original -- it
05:58:14 15 just might be a little more difficult, given the font
16 size. But on the left side you'll see that it talks
17 about this individual who said that "he had been
18 threatened with being evicted." Do you see that?

19 A. They were being evicted.

05:58:29 20 Q. And then you see all the way at the bottom
21 there was a house -- a picture of what appeared to be a
22 house that was burned to the ground. Do you see that?

23 A. I see that the -- I don't know about burned to
24 the ground because the wood is not burned to the ground.
05:58:49 25 The wood is laying on the ground.

05:58:53 1 Q. And you --

2 A. And farmers put their kitchens on the ground,
3 so it could have been a kitchen there that they put it
4 with blocks, and they put the wood under.

05:59:05 5 Q. You understand that in this article there's
6 also allegations that during the eviction schools that
7 were located on the Hacienda Santa Fé property were
8 destroyed?

9 A. I didn't know of any schools that were in
05:59:18 10 Hacienda Santa Fé. I know of our school that we paid
11 teacher, and the children of the workers and people in
12 the community sent their children to. And we fed them,
13 we paid for the teacher, we would give them the books
14 and they had -- some of them moved on actually of those
05:59:40 15 kids that we had at the school. Our school. I don't
16 know about schools in other part of the farm. I do not.

17 Q. Thank you, Mr. Rondón.

18 MR. MOLINA: I think this is a good
19 stopping point, Mr. President, members of the Tribunal.

05:59:55 20 PRESIDENT: Thank you very much,
21 Mr. Molina.

22 Mr. Rondón, you are still under
23 investigation, so unfortunately, you shouldn't discuss
24 your testimony with anybody tonight or during the night
06:00:09 25 or tomorrow morning. You are still sequestered. So you

06:00:16 1 will have a lonely dinner, unfortunately, tonight. We
2 will resume tomorrow morning at 9:00.

3 MR. APPLETON: Mr. President, before we
4 go, I'm sure that counsel for the Republic of Nicaragua
06:00:28 5 and counsel for Riverside both have the same burning
6 question from the secretary. Might we prevail on her
7 good offices and perhaps have her tell us the time
8 numbers at this time?

9 PRESIDENT: Of course, if they are
06:00:43 10 available.

11 MR. APPLETON: If they're available, of
12 course.

13 PRESIDENT: In any event, the accounting
14 will be sent or emailed later today.

06:01:05 15 MS. CONOVER: Yes, I am about to send them
16 by email in a couple of minutes, but would you like the
17 total remaining time for each party?

18 MR. APPLETON: Why don't you say for the
19 day, if you have it?

06:01:13 20 MS. CONOVER: Yes. The total for day 2
21 for the Claimant has been one hour and 27 minutes, and
22 for the Respondent it is three hours and 44 minutes.

23 MR. APPLETON: I just want to make sure
24 that that's exactly the same question that counsel for
06:01:35 25 the Republic of Nicaragua wants.

06:01:39

1 MS. GONZÁLEZ: I'm sorry, I don't
2 understand that. You will send the totals by email?

3 MS. CONOVER: That is correct, in a few
4 minutes.

06:01:49

5 MS. GONZÁLEZ: Thank you. That is enough
6 for us. Thank you.

06:02:00

7 PRESIDENT: Let me make one final request
8 for tomorrow and for all the coming days, in fact. We
9 have all been a bit slow in coming back from breaks. We
10 have been losing actually a lot of time by extending the
11 breaks beyond the 15 minutes. So let's try to be a bit
12 more efficient and prompt tomorrow and in the coming
13 days. That will make it easier for us to manage the
14 time and also will make sure that we will have shorter
15 days.

06:02:20

16 Thank you. Enjoy the evening.
17 (Hearing adjourned at 6:02 p.m.)

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<p>MR. APPLETON: [81] 291/6 292/21 295/6 296/11 297/10 298/4 299/11 299/16 301/13 309/2 331/18 331/23 332/4 332/9 332/13 332/16 332/20 339/8 340/13 341/8 346/8 346/13 346/21 347/1 347/8 347/13 347/18 348/8 348/20 349/8 349/16 350/20 352/14 352/21 353/12 386/25 387/6 395/11 396/10 404/17 404/22 405/1 405/25 413/5 413/10 413/18 413/22 414/1 414/22 415/25 416/8 420/17 421/8 430/6 430/9 430/22 431/2 431/9 431/15 431/25 432/8 434/14 434/19 434/24 450/9 450/13 450/20 460/10 462/2 462/5 463/10 466/16 466/18 468/9 468/21 469/5 518/1 523/3 523/11 523/18 523/23</p> <p>MR. FERRUFINO: [17] 350/3 350/6 350/10 350/18 351/10 351/15 352/8 352/13 353/9 353/25 354/13 360/4 388/3 412/23 414/11 414/18 434/9</p> <p>MR. HILL: [2] 470/23 476/24</p> <p>MR. MILLER: [15] 435/3 435/6 435/14 435/21 435/24 436/8 463/20 463/25 464/11 464/18 464/25 465/4 465/11 465/24 466/6</p> <p>MR. 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<p>W</p> <p>would... [54] 439/6 439/12 441/25 443/20 444/20 448/12 448/18 449/15 452/25 454/9 455/1 455/2 455/20 455/22 457/11 457/15 457/22 457/25 459/11 460/24 461/1 461/6 461/15 461/16 461/20 462/13 462/15 463/7 463/14 463/21 463/24 464/13 465/8 466/2 466/10 467/14 467/17 469/22 473/13 480/10 492/5 493/23 502/10 502/10 502/11 503/16 504/16 508/19 512/3 516/12 516/15 519/17 522/13 523/16 wouldn't [7] 360/25 374/9 374/17 380/9 386/12 458/15 467/7 write [10] 362/14 362/16 362/17 362/19 364/10 398/3 409/22 429/11 500/14 504/14 writing [1] 511/2 written [2] 364/8 515/16 wrong [3] 396/18 506/3 506/5 wrote [8] 293/5 487/5 493/21 494/11 494/12 495/7 510/23 518/21</p>	<p>459/22 461/3 461/4 463/21 464/9 467/3 472/17 478/11 514/8 514/10 516/10 yes [437] Yessenia [2] 398/8 398/14 Yesterday [1] 309/15 yet [12] 299/13 330/5 333/19 345/4 345/7 345/8 345/11 350/25 462/10 513/19 516/21 517/2 you [1594] you'd [4] 305/24 457/16 464/19 480/15 you'll [10] 324/11 324/12 350/14 395/7 479/2 495/11 504/4 515/6 515/21 521/16 you're [98] 305/16 305/19 309/22 310/7 310/16 310/18 315/1 319/4 320/10 326/25 329/12 329/16 331/15 333/5 335/24 336/5 336/6 336/10 337/7 337/9 338/2 339/10 363/3 363/15 365/10 368/5 369/15 369/18 372/3 378/16 379/8 380/3 381/6 381/22 391/15 393/6 393/19 395/12 399/17 401/15 404/19 405/17 407/8 407/18 407/19 407/21 409/14 414/6 430/20 441/24 453/4 453/4 455/9 461/17 463/2 474/13 474/14 477/13 477/21 477/25 481/23 482/1 486/2 490/16 493/15 494/20 494/23 495/10 497/21 498/1 498/14 499/23 500/2 500/9 501/6 501/7 501/15 501/18 501/23 502/3 503/2 503/4 504/25 508/12 509/11 509/19 510/12 510/18 510/25 511/2 511/9 511/9 511/13 511/20 512/2 512/17 512/23 519/9 you've [27] 293/10 302/12 303/15 310/4 310/13 316/2 316/5 327/20 328/14 335/7 339/17 344/18 355/3 362/3 362/6 367/4 388/13 416/3 424/23 430/12 460/20 461/13</p>	<p>482/2 485/13 509/3 512/24 516/10 young [1] 366/3 younger [2] 460/24 461/5 your [342] yours [1] 353/11 yourself [3] 334/23 336/2 384/7</p>		
<p>Y</p> <p>Yatán [1] 496/2 yeah [10] 335/18 336/11 365/14 403/10 420/10 425/16 440/18 455/8 480/19 516/5 year [24] 307/16 307/20 321/11 338/13 365/13 418/4 437/5 440/14 440/19 448/20 448/22 451/25 457/5 459/24 463/5 463/18 464/2 464/3 464/14 471/13 471/15 496/8 510/12 511/6 year's [1] 463/8 years [39] 314/24 323/14 367/24 369/3 377/15 391/11 391/11 391/12 401/16 401/18 437/4 437/7 439/7 439/18 439/23 441/19 441/22 447/1 448/21 452/2 452/7 452/13 452/19 453/2 453/9 453/16 456/11 459/2</p>		<p>Z</p> <p>Zeledón [1] 373/14 Zetina [4] 289/9 360/7 369/21 388/8 ziricote [1] 462/22 zoom [3] 322/15 376/10 413/9 zooming [1] 322/14 Zuniga [1] 289/10</p>		