

*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

3 July 2024

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ARBITRAL TRIBUNAL

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09:01:41

1

PRESIDENT: Good morning, and welcome to Day 3 of the hearing.

2

3

Are there any housekeeping issues we need to deal with before we continue with the witness?

4

09:01:53

5

Claimant?

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MR. APPLETON: Yes, but are we missing -- will Ms. González be joining us?

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MR. MOLINA: She'll be joining us.

9

MR. APPLETON: But we can proceed?

09:02:05

10

MR. MOLINA: Absolutely.

11

MR. APPLETON: Oh very good, okay. One matter, just to try and organize the witnesses and have them ready in order, we have -- the next witness is, of course, here in Washington, D.C. He's not that far away. Perhaps the Republic of Nicaragua could give us just a rough idea of whether we anticipate that we might reach that witness before lunchtime or after. That's basically all I need. I think we'll need half an hour to be able to get him here, but if he doesn't need to sit here, then we shouldn't have him waiting for half a day or a day.

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09:02:17

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MR. MOLINA: I expect to finish my cross before lunchtime, but obviously it will then depend on the length of your redirect.

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09:02:50

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MR. APPLETON: We have redirect I believe

09:02:50 1 booked for an hour and a half. So let's assume that on
2 this basis that we'll have the witness available at the
3 lunch break, and then that way we'll be ready to
4 proceed. And if you think that you're going to finish
09:03:02 5 significantly earlier, perhaps you'll just give us an
6 indication so we can then get the witness moved earlier.
7 PRESIDENT: Is that agreeable?
8 MR. MOLINA: Absolutely.
9 PRESIDENT: Very good. So on that basis,
09:03:16 10 let's go on.
11 It looks like there is no chance that we
12 would reach Mr. Welty today?
13 MR. MOLINA: I would think that's
14 unlikely, but we'll see how it goes, Mr. President.
09:03:37 15 Thank you.
16 PRESIDENT: Will he be available, if
17 needed?
18 MR. APPLETON: Mr. President, we would
19 need to have an indication really now because, under the
09:03:45 20 schedule, he wouldn't have been reached. We were
21 actually going to have Mr. Gutiérrez broken overnight
22 under the current schedule, so he would probably have to
23 go back and change.
24 PRESIDENT: Why don't we do the following:
09:04:02 25 We trust counsel. Counsel will liaise and

09:04:06 1 make sure that, if we finish so early that Mr. Welty can
2 be examined today, counsel for the Respondent will
3 liaise with Claimant's counsel.

4 MR. APPLETON: That makes sense. I just
09:04:19 5 want to look at the amount of time that the Republic of
6 Nicaragua has booked for Mr. Welty -- sorry, for
7 Mr. Gutiérrez. It seems unlikely that we would get to
8 Mr. Welty today unless --

9 PRESIDENT: That is what Mr. Molina also
09:04:36 10 said. So that's where we are.

11 So anything else? Respondent?

12 MR. MOLINA: Not at this time. Thanks.

13 PRESIDENT: Very good. So we will
14 continue with the examination of Mr. Rondón.

09:04:51 15 Mr. Molina, please.

16 MR. MOLINA: Thank you, Mr. President.

17 **CONTINUED CROSS-EXAMINATION**

18 BY MR. MOLINA:

19 Q. Good morning, Mr. Rondón.

09:04:59 20 A. Good morning.

21 Q. Yesterday I believe we left off with this
22 newspaper article that we're going to be putting back on
23 the screen. For the record, this is Exhibit R-0036.

24 Mr. Rondón, yesterday we covered several
09:05:15 25 documents that either you sent or received regarding the

09:05:20 1 occupiers that were at the Hacienda Santa Fé in the late
2 '90s and early 2000s. Do you remember that? I think
3 your microphone might be off.

4 A. Yes.

09:05:34 5 Q. Thank you, Mr. Rondón.

6 Just for the record, in those letters and
7 correspondences, you do not allege in writing that the
8 occupiers at the Hacienda were government-backed
9 paramilitaries, correct?

09:05:57 10 A. Can you refer to this statement? Where is it
11 coming from?

12 Q. Remember yesterday we covered some of the
13 letters that you'd sent to the Office of Title
14 Registration? Do you remember that?

09:06:06 15 A. Yes, I remember the letter. Can you post it,
16 please?

17 Q. Sure.

18 MR. MOLINA: Mr. Ricky, I believe it's
19 R-177, tab 8.

09:06:55 20 Q. Do you see on the screen, Mr. Rondón, you're
21 being shown R-177, Tab 8. This is the
22 August 2000 letter that you wrote to the government
23 regarding the people at the Hacienda at that time. Do
24 you remember that?

09:07:09 25 A. Yes.

09:07:10 1 Q. Here in this letter, as we already covered
2 yesterday, you called the occupiers "a group of
3 invaders" and you noted that they were -- that they had
4 come as a result of a recommendation from Mr. Jaime
09:07:29 5 Cuadra Somarriba in 1990. Do you see that?

6 A. Yes, I do.

7 Q. Just again for the record, at this time you're
8 not calling these people government-backed
9 paramilitaries, correct?

09:07:49 10 A. That is correct.

11 Q. You understand that the people -- that this
12 reference you make to 1990, this is a reference to the
13 peace settlements that were entered into between the
14 government and the former members of the Nicaraguan
09:08:03 15 resistance, yes?

16 A. I wasn't privy to that, but I was aware that
17 they had signed something. I didn't know what it was
18 that they signed, but the government in Nicaragua did
19 sign agreements with some of the groups that were armed.

09:08:29 20 Q. This was under the administration of President
21 Violeta de Chamorro, correct?

22 A. Yes.

23 Q. Just for the record, she was not a member of
24 any Sandinista-affiliated political party, correct?

09:08:54 25 A. I'm not into politics. I was in Nicaragua

09:08:57 1 during the '80s one day. She came from a very nice
2 housewife, and she was voted by a multiparty group. So
3 I don't know what political party supported her.

4 Q. You understand that the people then who entered
09:09:13 5 into the Hacienda Santa Fé around this time, in 1990,
6 formed a community in the El Pavón sector of the
7 Hacienda, yes?

8 A. Mr. Jaime Cuadra signed that letter along with
9 two other people. Mr Jaime Cuadra is a bankrobber for
09:09:38 10 the Sandinista Front. A little background on them. The
11 other one, who is now the Chief of Police of Jinotega,
12 Mr. Castro, and the third person was a farmer for
13 Sandinista, Castillo, from the City of Estelí.

14 So all three people that signed this
09:09:57 15 letter were Sandinista members.

16 Q. That wasn't my question, Mr. Rondón. My
17 question was you understand that the people who entered
18 the Hacienda in 1990 settled in the El Pavón sector of
19 the Hacienda Santa Fé, correct?

09:10:09 20 A. We don't call any part of the Hacienda Santa Fé
21 El Pavón. We call it La Esperanza, that part of the
22 farm, the eastern section of the farm.

23 Q. They settled in the upper sector of the
24 Hacienda, correct?

09:10:19 25 A. Eastern part of the farm.

09:10:22 1 Q. And you understand that they were not
2 establishing a military base at that time, correct?

3 A. I don't believe they had a military base there.

4 Q. Right. They set up schools and dwellings, yes?

09:10:38 5 A. I am unaware that they had school. I know that
6 they had huts.

7 Q. If you go back to --

8 MR. MOLINA: Thank you, Mr. Ricky. Do you
9 mind putting back up R-36?

09:10:52 10 MS. GREENWOOD: Sorry, Counsel, could I
11 just ask a clarificatory question?

12 MR. MOLINA: Absolutely.

13 MS. GREENWOOD: Mr. Rondón, my apologies.
14 We've had quite a bit of testimony about the northern
09:11:00 15 part of the Hacienda Santa Fé and the southern part, and
16 your testimony now is talking about the eastern part.
17 If you could just help the Tribunal understand which
18 bits we're talking about?

19 MR. RONDÓN: Yes, I am delighted to do so.
09:11:14 20 If we take a geographic coordinate, it's east -- a
21 little north, barely a little north -- of the
22 headquarters of the farm. But it's east of the farm --
23 of the headquarters of the farm. So I call it eastern
24 because that's how it looks in a map.

09:11:37 25 MS. GREENWOOD: Understood.

09:11:39 1 MR. RONDÓN: The northern part is not.

2 MS. GREENWOOD: I understand that, and
3 that's where you're saying that there were the huts that
4 you just mentioned?

09:11:50 5 MR. RONDON: Yes.

6 MS. GREENWOOD: Great. Thank you, that's
7 helpful.

8 MR. RONDON: Thanks for the question.

9 MS. GREENWOOD: Do proceed, Counsel.

09:11:58 10 MR. MOLINA: Thank you.

11 Q. So, Mr. Rondón, now we're back up to where we
12 started, and I just want to turn to the second page in
13 the English translation on the left. You see in the
14 second paragraph there's a paragraph that starts with
09:12:14 15 "Valentin López Blandón." Do you see that?

16 A. I read what it says there, but I don't believe
17 it's true.

18 Q. You've noted or you've identified this
19 individual in your witness statements, correct?

09:12:45 20 A. There are two names here. Which one of the
21 two?

22 Q. I'm speaking --

23 A. Two names. I'm sorry.

24 Q. It's all right.

09:12:53 25 I'm speaking about Mr. Blandón.

09:12:56 1 A. I never met him. It's from what I had learned,
2 that he was a land trafficker. My question -- I look at
3 this picture here in the newspaper. Where did they get
4 the wood? Where did they get to build that -- you know,
09:13:18 5 house? Where did they get the other wood here that is
6 on the ground?

7 Q. Mr. Rondón, apologies, but I'm going to be the
8 one asking you questions. I'd appreciate if you can
9 answer my questions. It's my time. You'll have time
09:13:31 10 with your lawyer to talk about the pictures, if that's
11 what you want to do.

12 PRESIDENT: Yes, indeed, Mr. Rondón.
13 There will be further questions by counsel for the
14 Claimant, so if there are any open issues, they will be
09:13:42 15 able to address those. But please answer the questions.
16 Otherwise, this will be a very long day.

17 Q. So you see here Mr. Blandón is identified as
18 the president of Cooperativa Pavón. Do you see that?

19 A. I see.

09:13:59 20 Q. You understand that Cooperativa Pavón is a
21 reference to a farming cooperative based at that time in
22 Hacienda Santa Fé, yes?

23 A. No, I did not know.

24 Q. You did not know?

09:14:08 25 A. No.

09:14:13 1 Q. It's your testimony that as of this time, 2003,
2 you were completely unaware there were a group of people
3 in your Hacienda who had identified themselves as part
4 of a farming cooperative called Cooperativa El Pavón?

09:14:27 5 A. I knew what they called themselves, but I
6 didn't know if they were a legal co-op. I never saw
7 their papers.

8 Q. Why don't we turn to -- well, before we turn --
9 MR. MOLINA: You can take that down, thank
09:14:47 10 you. Actually, I'm sorry, Ricky. Put it back up real
11 fast.

12 Q. Before we move off of this, yesterday you did
13 mention in -- and just for the record, it was in
14 page 505, lines 21 to 22 of the transcript from
09:15:03 15 yesterday, July 2, 2024 -- you mentioned that --
16 remember when I asked you about ferns, Mr. Rondón?

17 A. Yes.

18 Q. I think you mentioned that you had been
19 approved for a \$6.3 million fern project?

09:15:23 20 A. I had been approved for a \$6.3 million by OPIC,
21 which is a branch of the United States government for
22 development in countries that are coming out of civil
23 strife.

24 Q. Specifically for the development of ferns?

09:15:41 25 A. In our case, it was.

09:15:44 1 Q. In fact, at the bottom of this article there's
2 a reference to this venture that you were pursuing at
3 that time.

4 MR. MOLINA: If we could go to the next
09:15:53 5 page on the left, Mr. Ricky. If you look at -- if you
6 look at the last three paragraphs, just highlight those
7 so we can read them. Thank you, Mr. Ricky.

8 Q. I'll give you a chance to read it, Mr. Rondón.
9 Let me know when you're ready.

09:16:47 10 A. There are inaccuracies in --

11 Q. Mr. Rondón, I haven't asked you a question yet.
12 Just let me know when you're ready.

13 A. I'm ready.

14 Q. So my question is here there is a reference
09:16:58 15 that INAGROSA is waiting to rid the Hacienda of its
16 occupiers so that it could obtain investments, correct?

17 A. Can you give me the date of the newspaper
18 article?

19 Q. I think we established on the record yesterday
09:17:13 20 it's from November 2003.

21 A. There's so many dates flowing in my head that
22 in order to establish a correct date, that's why I ask.
23 Thank you.

24 That's not the case.

09:17:34 25 Q. Just for the record, did you submit anything

09:17:37 1 with your witness statements or with any of the
2 Riverside memorials relating to this approval from OPIC
3 to pursue a fern business venture?

4 A. I don't understand your question.

09:17:52 5 Q. Did you submit any of the -- any paper or any
6 document that memorialized this approval that you
7 mentioned for \$6.3 million to develop ferns at Hacienda
8 Santa Fé?

9 A. I don't remember.

09:18:10 10 MR. MOLINA: Thank you, Mr. Ricky. You
11 can take it down.

12 Q. So back to the -- back to this time frame. So
13 just, again, we're in the late 2003 time frame. We've
14 already established that you started evicting these
09:18:23 15 occupiers from Hacienda Santa Fé around that time, yes?

16 A. Yes, in 2003.

17 Q. And you know that the government wanted to help
18 INAGROSA evict those people from your Hacienda, yes?

19 A. They certainly did. They wanted to regularize,
09:18:43 20 you know, the status in Nicaragua of law and order.

21 Q. And, in fact, the police was the entity
22 responsible for carrying out the evictions that we
23 discussed yesterday in late 2003, yes?

24 A. In Nicaragua, you know, law, decisions by the
09:19:02 25 courts, are carried out by the police, in effect, yes.

09:19:07 1 Q. You also know during this time there were
2 various other ministries and governmental organs that
3 were working around the clock to relocate the hundreds
4 of people at your Hacienda to other properties, yes?

09:19:23 5 A. There were entities of the government working
6 on it to relocate the people, yes.

7 Q. But as we also established yesterday, it took
8 time, correct?

9 A. It took too long, in our opinion.

09:19:37 10 Q. Right. You started -- your first letter that
11 we covered yesterday was in August 2000, and as we
12 discussed, the evictions began in late 2003, yes?

13 A. Correct.

14 Q. But even then, the evictions were not fully
09:19:53 15 completed by late 2003, yes?

16 A. We started in late 2003, stopped for coffee
17 harvest. After coffee harvest, we finished the eviction
18 process by April 2004.

19 Q. Right. So it took several months to evict the
09:20:13 20 hundreds of people that were at the Hacienda even with
21 police force, yes?

22 A. It took active eviction process, no more than,
23 I would say -- in days where they were taking the people
24 out, no more than 60 days.

09:20:38 25 Q. Now, you understand that some of the people who

09:20:44 1 were evicted in that time frame, they still felt that
2 they had a right to live at your Hacienda. You know
3 that?

4 A. I don't understand that, no. I didn't ask them
09:20:58 5 for their opinion.

6 Q. Obviously they're wrong. The property had
7 always belonged to your family and your companies, yes?

8 A. That's correct.

9 Q. But you understand there are people that you
09:21:11 10 evicted who at that time, as of the eviction, were
11 asking the government for the right to obtain title to
12 your property?

13 A. We weren't selling the property, so there is a
14 controversy. It's not for sale, so they had to leave.

09:21:31 15 Q. Right. You wanted them out; they wanted to
16 stay, yes?

17 A. The land traffickers, yes.

18 Q. So now I want to fast forward. I'm going to
19 jump in time about 15 years. Now we're going to
09:21:48 20 June 2018.

21 You reference, in paragraphs 46 to 47 of
22 your second witness statement -- this is CWS-09 -- a
23 letter dated June 5, 2018. I'm going to put it up on
24 the screen so we can all follow along.

09:22:06 25 MR. MOLINA: Mr. Ricky, do you mind

09:22:08 1 putting up Exhibit R-0064?

2 A. Can you put the Spanish version, please?

3 Q. Absolutely.

4 Okay. Mr. Rondón, I am showing you on the
09:22:38 5 screen the document that's been designated for this
6 record as R-0064. It's a letter dated June 5, 2018, and
7 it's a document that you've referenced in your second
8 witness statement in paragraphs 46 to 47. Do you
9 recognize this letter?

09:22:55 10 A. I saw this letter for the first time until you
11 sent a bundle late -- just before the Tribunal got
12 started in the last 90 days. Prior to that, I had no
13 knowledge of that letter. That's internal communication
14 between -- I guess it's been sent to a government
09:23:15 15 entity. I should have no copy of it, and I don't know
16 who signs it because I don't see a signature there.
17 It's a highly politicized letter from the content.
18 That's the reason why I asked to see it in Spanish. It
19 starts with "Compañero." Tovarishch, comrade.

09:23:35 20 Q. So you see -- so you are familiar with this
21 letter, sitting here today, yes?

22 A. Until I saw it, until you sent it, the bundle
23 that was sent to Mr. Barry Appleton, our lawyer, very,
24 very recent.

09:23:52 25 Q. So you see on this letter, a short letter, it

09:23:56 1 says on the first page it's a letter addressed to the
2 Attorney General's office of Jinotega. Do you see that?

3 A. It says Attorney General, but it doesn't state
4 the name.

09:24:17 5 Q. I'm just asking if it's directed at the
6 Attorney General's office for Jinotega, yes?

7 A. Yes, but who is it?

8 Q. Mr. Rondón, I'm going to ask you the question.
9 Just answer my question, please.

09:24:28 10 In this letter there's a reference to
11 these people identify themselves as being part of the
12 El Pavón cooperative. Do you see that?

13 A. Can you bring it down more? Is that the end of
14 the letter right there?

09:25:10 15 Q. I think it goes to one other page.

16 A. Can I see it?

17 Q. Absolutely.

18 A. Yeah, for us in INAGROSA, that was a dead
19 issue.

09:25:46 20 Q. For them, though, they said in this letter,
21 they said we're the people that were invited to go to
22 Hacienda Santa Fé, according to the peace agreements
23 from the Violeta de Chamorro administration in 1990. Do
24 you see that? That's what it says.

09:26:05 25 A. Since the eviction in 2003/2004 until this

09:26:12 1 is -- what is it? How many years is that?

2 Q. I'm asking you the question, Mr. Rondón.

3 Please answer my question.

4 A. Can you repeat the question, please?

09:26:22 5 Q. Do you see that this letter identifies that the
6 people sending it identify themselves as part of the
7 El Pavón cooperative that lived at the Hacienda in the
8 1990s? Do you see that?

9 A. I don't know who they were. I don't know who
09:26:37 10 they are.

11 Q. Do you see that it says that they had lived
12 there for 15 years and that they had been evicted in
13 2004? Do you see that?

14 A. I cannot ensure that they have lived there for
09:26:49 15 15 years, but I can assure you that they were evicted in
16 2003/2004.

17 Q. These are the same people that used to live in
18 your property, and what they're telling the government
19 here is they want to get back into your property. Do
09:27:06 20 you see that?

21 A. I cannot assure that they are the ones that we
22 evicted. I've never had lists from the government of
23 anybody there. So you're asking me something that I
24 would have no knowledge of.

09:27:23 25 Q. I'm not asking you if you have knowledge or if

09:27:25 1 you can confirm it. I'm asking that's what -- I'm
2 asking you to confirm that that's what they're telling
3 the government, yes?

4 A. It's a dead issue to us. Whatever they tell
09:27:35 5 the government to us is a dead legal issue.

6 Q. Your testimony --

7 MR. MOLINA: Thank you, Mr. Ricky.

8 Q. Your testimony is, as I understand it, as we
9 discussed yesterday, that the people who invaded your
09:27:51 10 Hacienda in 2018 were government-backed paramilitaries.
11 That's what you told me yesterday, yes?

12 A. Can you state the year when it was -- what
13 you're referring to?

14 Q. I'm referring to your testimony from yesterday
09:28:05 15 that the people who invaded your Hacienda in June 2018
16 were government-backed paramilitaries. Do you remember
17 telling me that yesterday?

18 A. Definitely.

19 Q. And you see here this letter -- let's just take
09:28:22 20 it down. Let's go to -- you're familiar with the
21 letter -- sorry, you're familiar with the witness
22 statement of Ms. Diana Gutiérrez from the Attorney
23 General's office in Jinotega in this arbitration, yes?

24 A. I know she wrote a letter, you know, as a
09:28:39 25 witness statement. I read it. I don't know what you're

09:28:44 1 referring to in the letter.

2 Q. Well, you're familiar that after the June 16,
3 2018 invasion of Hacienda Santa Fé, that the PP invaders
4 wrote letters to the government. You saw that in her
09:29:01 5 witness statement, yes?

6 A. I never saw a letter. I only saw what she
7 said. I don't know who wrote letters to her.

8 Q. Do you have any reason to believe that those
9 letters don't exist?

09:29:13 10 A. They can make them up. It's the Sandinista
11 government.

12 Q. So your testimony is that whatever letters are
13 in this record from that time frame are falsified.
14 That's your testimony?

09:29:24 15 A. Based on the record of the Sandinistas, I would
16 say so.

17 Q. And do you have any evidence for that?

18 A. The record. The antecedents speak for
19 themselves very loudly.

09:29:48 20 Q. We've covered a lot of history here between
21 1990 all the way to 2004 talking about these evictions,
22 right? So now I want to talk a little more about more
23 recent evictions and the more recent invasions of your
24 property.

09:30:04 25 Just for the record, when the June 16,

09:30:07 1 2018 invasion that you characterize in your witness
2 statements, when that occurred, you were not at Hacienda
3 Santa Fé at that time, yes?

4 A. I was not.

09:30:15 5 Q. You were not in Nicaragua at that time?

6 A. I was not.

7 Q. Your testimony about that invasion is based
8 entirely on information you obtained from people who
9 work for you, yes?

09:30:26 10 A. The testimony for this invasion, I would say,
11 and the information that I was getting as it was taking
12 place, the invasion of our farm, confiscation of our
13 farm.

14 Q. So the people who were feeding you that
09:30:41 15 information were specifically your administrator,
16 Mr. Luis Gutiérrez, yes?

17 A. Mr. Luis Gutiérrez and he was getting it from
18 the workers inside at the farm and was confirmed later
19 when I spoke on the 17th of June to Captain Herrera.
09:31:05 20 And I asked him how come this is going on and you're
21 allowing this to happen in Hacienda Santa Fé. He had
22 strict orders from the Chief of Police of Jinotega not
23 to remove anybody from the farm.

24 Q. We'll get to that. I just want to set the
09:31:19 25 setting here.

09:31:20 1 You got information from Mr. Gutiérrez,
2 who you say then obtained that information from several
3 of the workers at Hacienda Santa Fé, yes?

4 A. Yes.

09:31:28 5 Q. Specifically, they obtained information from
6 Mr. Jaime Enriquez, who goes by the name Jaime Vivas,
7 yes?

8 A. Yes.

9 Q. You also got this information from Mr. Domingo
09:31:45 10 Ferrufino, yes?

11 A. Yes.

12 Q. You also got this information from Mr. Raymundo
13 Palacios, yes?

14 A. Yes.

09:31:49 15 Q. Mr. Palacios and Mr. Ferrufino at that time
16 acted as security guards for Hacienda Santa Fé, yes?

17 A. Were security guards.

18 Q. And Mr. Gutiérrez at that time was the chief
19 agronomist and also the administrator of the Hacienda,
09:32:07 20 yes?

21 A. Yes.

22 Q. And Mr. Jaime Vivas was an employee or someone
23 who reported to Mr. Gutiérrez, yes?

24 A. Mr. Vivas was the supervision of nursery and
09:32:20 25 grafting of saplings.

09:32:23 1 Q. And you testify in your witness statements that
2 these invaders, they came in waves, yes?

3 A. Yes, they did.

4 Q. The first wave started June 16, 2018, according
09:32:36 5 to your testimony, yes?

6 A. It started June 16th, 2018.

7 Q. Right. And the next wave that you identify in
8 your testimony was in mid July 2018, yes?

9 A. I believe it might have been July 16th, 2018.

09:32:58 10 I'm not looking at the papers right now. So many dates
11 run through my head. But Mr. Gutiérrez will be able to
12 tell you.

13 Q. So according to your testimony, the first wave,
14 the invaders took what you call the eastern part of the
09:33:14 15 Hacienda, yes?

16 A. Yes.

17 Q. That's again, for the record, that's not the
18 area where the Casa Hacienda is located, correct?

19 A. That's correct.

09:33:22 20 Q. It's not the area where the plantations are
21 located, right?

22 A. We had plenty of coffee planted in that area.
23 The Hass avocado was at the other end of the farm, the
24 western side.

09:33:34 25 Q. And then your testimony is that in that second

09:33:36 1 wave the invaders reached the Casa Hacienda, yes?

2 A. Certainly did.

3 Q. And your testimony is that there were roughly
4 350 invaders, some of whom were armed, yes?

09:33:57 5 A. They were heavily armed, according to
6 themselves.

7 Q. And the number is roughly 350, yes?

8 A. I wasn't there to count them, but apparently it
9 was a very large number.

09:34:11 10 Q. Now, in your testimony, you identify all the
11 people who informed you or that you understood saw these
12 invaders come in through these waves, yes?

13 A. The first report that I got, that June the
14 16th, which was a Saturday, it stated the names of the
09:34:34 15 people that had come through the eastern part of the
16 farm. Chaparra, by the last name of Galiana -- Galiano
17 that works for Diana Gutiérrez and Rosario Murillo and
18 the other people that were heavily armed with her.

19 Q. My question was you identified all the people
09:34:51 20 at Hacienda Santa Fé, the people who worked for
21 INAGROSA, you've identified all those people who saw the
22 invasion take place, yes?

23 A. Yes.

24 Q. And those are the people, again, that I've
09:35:03 25 already mentioned: Mr. Gutiérrez, Mr. Palacios,

09:35:06 1 Mr. Ferrufino and Mr. Enriquez, also known as Mr. Vivas,
2 yes?

3 A. Yes. There was a name of a guard that you
4 omitted. I don't know -- Chapon Chavarria, José
09:35:23 5 Chavarria -- also a guard, and I know that he lived at
6 the eastern part of the farm.

7 Q. So Mr. Chavarria, we'll add him to the list.
8 That's roughly -- let me count. That's six people that
9 we've identified, yes?

09:35:38 10 A. That's correct.

11 Q. Over the course of June to July, six people at
12 the Hacienda saw hundreds of armed invaders go into
13 different portions of the Hacienda, yes?

14 A. Yes.

09:35:54 15 Q. Notably, in your testimony there's no
16 indication that there were any field workers working the
17 plantations who saw these invaders come in, correct?

18 A. It was a Saturday. There were no field workers
19 that day.

09:36:12 20 Q. So nobody saw them come in -- no field workers
21 saw them come in in June or in July, yes?

22 A. By July, our farm had been confiscated. People
23 had fled the farm in fear.

24 Q. My question is simply there's no indication in
09:36:30 25 your witness statements that any field workers saw or

09:36:33 1 reported the invaders as they were coming throughout the
2 Hacienda, yes?

3 A. The first invasion in June 16th, it was a
4 weekend, so they were not doing any field work
09:36:54 5 essentially. The one in July, after what had happened
6 at the farm, when you see armed invaders and you get
7 kicked out of your home -- the farm was their home for
8 the field workers -- what do you do? They say that
9 their lives had been threatened for some of the workers.
09:37:10 10 What do you do? They ran in fear.

11 Q. Thank you, Mr. Rondón. But your testimony,
12 again -- just to be clear, your testimony is that the
13 invaders took what you call the eastern part of the
14 Hacienda and occupied it continuously from June 16, 2018
09:37:32 15 to July 2018, yes?

16 A. Yes.

17 Q. And your testimony is that they did not reach
18 the other part of the Hacienda where the avocado
19 plantations were until July 16, 2018, yes?

09:37:47 20 A. I don't know. I wasn't at the farm. I don't
21 know what they did in between. It's a large farm. Part
22 of the farm that was later occupied was the headquarters
23 of the farm. From there to get to where the Hass
24 avocado was is a lot closer than the 5 or 6 kilometers
09:38:08 25 from the eastern side of the farm.

09:38:10 1 Q. And you testified that the administrator,
2 Mr. Gutierrez, was well aware and, in fact, reported to
3 you as early as June 16, 2018, that there were hundreds
4 of armed invaders in the eastern part of the Hacienda,
09:38:22 5 yes?

6 A. He could not count them, you know. I mean, you
7 got to put it into perspective what goes on when you
8 have a violent group illegally entering, occupying and
9 confiscating the place and threatening people with guns.
09:38:43 10 It puts a fear in your life. You want to survive. You
11 want to be alive.

12 Q. So between June 16, 2018 and July 16, 2018, if
13 you're a field worker working the avocado plantations in
14 the other part of the Hacienda, you're aware that just a
09:38:59 15 few kilometers away there's hundreds of armed invaders,
16 yes?

17 A. They knew, obviously.

18 Q. But there's no witness statement in this record
19 from any of those field workers, true?

09:39:12 20 A. Because they weren't there for the first
21 invasion. But if you want to go to Nicaragua and speak
22 to the field workers that were working at the farm at
23 the time, you're welcome to. They will tell you.

24 Q. Is it your testimony that there were no field
09:39:25 25 workers working the avocado plantations between June 16,

09:39:28 1 2018 and July 16, 2018?

2 A. That, I would refer that you ask that question
3 to our administrator, Ingeniero Luis Gutiérrez.

4 Q. We've already identified some of these security
09:39:47 5 guards, and just again for the record, I believe it's
6 Mr. Palacios, Mr. Ferrufino, and Mr. Chavarria, yes?

7 A. Palacios, Ferrufino, Chavarria -- there is a
8 couple more names. Yes.

9 Q. So how many -- just for the record, how many
09:40:04 10 more security guards were at the Hacienda between June
11 and August of 2018?

12 A. At the time of the confiscation June 16, 2018,
13 there were five security guards working for INAGROSA at
14 Hacienda Santa Fé.

09:40:22 15 Q. And just for the record, you submitted witness
16 statements only for Mr. Ferrufino, but not for the other
17 four security guards. True?

18 A. I don't have a recollection at this time, but
19 you can ask Mr. Gutiérrez.

09:40:40 20 Q. So you testified in your witness statements
21 about the confiscation of guns by the police where the
22 police entered the Hacienda and took the guns from your
23 security guards. Do you remember that?

24 A. Yes, he took the shotguns.

09:41:01 25 Q. And you said that that was unfortunate, in your

09:41:04 1 characterization, because you believe that the security
2 guards should keep the guns so they could defend
3 themselves, yes?

4 A. To do their work properly, a security guard
09:41:18 5 needs to be armed. What they, by law, were permitted to
6 carry were pistols and shotguns, so they had shotguns.

7 Q. So we just established that there were at most
8 five security guards at the Hacienda between June and
9 August 2018, and there were hundreds of invaders who
09:41:35 10 were armed at that same time in the same Hacienda, yes?

11 A. I would defer that question with details to
12 Mr. Gutiérrez, but yes, we had that many invaders there
13 at the farm. And by then our workers had been
14 threatened with their lives. And myself.

09:42:01 15 Q. Was it your expectation that these five
16 security guards should take on the hundreds of armed
17 invaders?

18 A. My expectation was that they weren't there to
19 stop paramilitaries. They were there to guard from
09:42:14 20 common ordinary crime, not take on hundreds of
21 organized, financed, armed invaders by the government.
22 Violent people.

23 Q. You were informed of this invasion on June 16,
24 2018, yes?

09:42:50 25 A. Yes.

09:42:53 1 Q. And, basically, my understanding is that once
2 you were informed, you called the police to alert them
3 of the events that were communicated to you by
4 Mr. Gutiérrez, yes?

09:43:06 5 A. I spoke to Captain Herrera the 17th, which is a
6 Sunday, of June 2018. And I state to him -- stated to
7 him "What is going on? How come you're not acting as a
8 police and go and evict these people from our farm?" He
9 said we have direct instructions from Commissioner
09:43:37 10 Castro to not do anything.

11 Q. Right. Now --

12 A. So I asked him, "Can I have the telephone
13 number for Commissioner Castro?" He gave it to me. I
14 called up that number. Nobody answered it. And there
09:43:51 15 was not space to leave a message. He didn't answer, and
16 then that's it. It went dead.

17 Q. Now, what you don't mention in your testimony
18 is that during that time, Nicaragua was undergoing
19 unprecedented civil strife, correct?

09:44:10 20 A. Nicaragua had the people of Nicaragua
21 protesting Daniel Ortega's regime and dictatorship and
22 they were out in the streets in peaceful manners with
23 hundreds of thousands turning out in the major city in
24 Managua with the Nicaraguan flag marching. A lot of
09:44:32 25 them were gunned down. Mother's day, the 30th May 2018,

09:44:36 1 fired by sniper, head shots, neck shots, heart shots,
2 and that is related by the documents of the United
3 Nations Human Rights Commission.

4 Q. So you understand there was violence. You just
09:44:52 5 described there was violence on the streets.

6 A. Snipers by the government were shooting
7 peaceful demonstrators in a march on Mother's Day. The
8 women's march.

9 Q. You understand that there were dozens of police
09:45:07 10 officers who also died during these protests, yes?

11 A. I don't know. I haven't seen the list, but I
12 know from police that have come to the United States or
13 gone to Costa Rica that said that the police killed some
14 of their own that didn't want to carry out the
09:45:28 15 instructions of suppressing the people.

16 Q. So you called the police. First you called
17 Mr. Herrera, and then you called Mr. Castro, yes?

18 A. Yes.

19 Q. Now, again, I'm just going to refer you back to
09:45:43 20 the testimony you gave me yesterday and today about what
21 you were doing from 2000 to 2004 when you had occupiers
22 at your Hacienda.

23 So let me ask you this. In 2018, did you
24 go to the court and seek an eviction order to get the
09:46:06 25 people out of your Hacienda, yes or no?

09:46:19 1 A. In 2018, Comandante Chaparra, last name
2 Galiano --

3 Q. I promise you'll have a time to talk about
4 whatever you want to talk about. Just please answer my
09:46:30 5 question. Did you get an eviction order, yes or no?

6 A. How could you? They're the court, they're the
7 police, they're the army.

8 Q. So the answer is no?

9 A. Of course not.

09:46:41 10 Q. Did you reach out to the US embassy and seek
11 their intervention, yes or no?

12 A. I spoke to somebody at the State Department
13 here in the United States.

14 Q. You didn't put that in your witness statements,
09:46:55 15 did you?

16 A. No, I did not.

17 Q. Did you write a letter to any ministry of the
18 government saying, help, I have people in my property?
19 Yes or no?

09:47:08 20 A. I didn't have any trust in the government of
21 Daniel Ortega and Rosario Murillo. This would be -- why
22 waste your breath?

23 Q. Right. So you made two phone calls, and that's
24 all you say you did in your witness statements, yes?

09:47:26 25 A. That's correct.

09:47:27 1 Q. Now, you also say that in August of 2018, so
2 two months or so later, you wrote a letter to at that
3 time Captain William Herrera, who is one of the police
4 officers for San Rafael del Norte in the Department of
09:47:42 5 Jinotega, correct?

6 A. I wrote a letter dated August the 10th, 2018
7 directed to Captain Herrera at the police in San Rafael
8 del Norte. He was the Chief of Police in San Rafael.

9 Q. Right. And you're aware that -- because it's
09:48:12 10 been confirmed in this record by Riverside -- you're
11 aware that this letter was formally delivered to
12 Mr. Herrera on August the 12th?

13 A. Yes, I'm aware. It was delivered by the
14 attorney Rivera Monzón, and agronomist Luis Gutiérrez
09:48:32 15 signed and stamped.

16 Q. So you're also aware that the very next day
17 after the police receives this letter -- so on
18 August 13, 2018 -- they arrived to the Hacienda and they
19 get the invaders out of your property. You know that?

09:48:53 20 A. Can you repeat the question, please?

21 Q. Sure. We established that you sent a letter on
22 August the 10th to Captain Herrera and that he received
23 it on August the 12th.

24 My question is you're aware that the next
09:49:07 25 day, on August 13th, the police showed up to your

09:49:11 1 Hacienda and removed the invaders from the property,
2 right?

3 A. What I know is that, on August the 14th,
4 Captain Herrera, with Luis Gutiérrez, Attorney Rivera
09:49:37 5 Monzón and five more policemen with the City of
6 San Rafael del Norte, went to Hacienda Santa Fé to
7 conduct an inspection of the damage and destruction
8 caused there. And they went for that purpose.

9 At the time at the headquarters they
09:49:55 10 didn't see anybody. But how can you be sure there were
11 no invaders when I saw a letter that you guys sent late
12 from a fellow that goes by the name of Wama, who was one
13 of the invaders of Hacienda Santa Fé, and he states in
14 the letter that he never left the farm. That he went in
09:50:20 15 there, I believe June 16, 2018, and that he never left
16 the farm. And this individual is very dangerous. He
17 was involved in the war in the 1980s. A very violent
18 individual.

19 Q. So in your testimony that you've given, you
09:50:40 20 reference the formal document that was issued by the
21 police and by INAGROSA to memorialize this August 14,
22 2018 visit to the Hacienda, correct?

23 A. There is a protocol from Mr. Rivera Monzón, the
24 lawyer, that he took note of the destruction and theft,
09:51:06 25 looting of property that had taken place at the

09:51:09 1 headquarters of Hacienda Santa Fé. They only conducted
2 that inspection in the headquarters. They didn't go to
3 the eastern part of the farm to conduct more inspection
4 because there were a lot more equipment in that section
09:51:24 5 of the farm as well. And there the destruction had been
6 more massive than the lower part.

7 MR. MOLINA: Mr. Ricky, do you mind
8 putting up the document C-58? For the record, this
9 document is originally in Spanish. Riverside produced
09:51:43 10 it but did not produce an English translation. So I'm
11 going to put on the right, or next to it, what I believe
12 is designated as R-148, which I represent for the record
13 is -- yes, R-148, which for the record is an English
14 translation of C-58.

09:52:06 15 Q. Mr. Rondón, this is the document that you're
16 referring to?

17 A. It's the first time I see it.

18 Q. Well, you reference it in your witness
19 statement.

09:52:14 20 A. What I referenced is that it was looted and the
21 notes taken by ingeniero Luis Gutiérrez.

22 Q. We'll put up the cite in the record here for
23 where it's referenced in your witness statement, but for
24 the purposes of moving on with this, can I just
09:52:38 25 highlight that on that first paragraph you see that it

09:52:41 1 says -- before it gets to the damages portion of this
2 document, it says that from Saturday June 16th to Monday
3 August 13th of that year, in other words, 2018, that
4 there were individuals who had violently invaded and
09:53:04 5 trespassed onto your property and later vacated as a
6 result of the operations carried out by the National
7 Police. Do you see that?
8 A. Yes.
9 Q. If you go to the bottom of this document --
09:53:18 10 MR. MOLINA: Do you mind doing it on the
11 Spanish version? I don't think that the English
12 document has the signature. Go to the bottom of the
13 last page.
14 A. Can you make this letter bigger, please?
09:53:28 15 MR. MOLINA: Yes, please, make it bigger
16 so Mr. Rondón can see.
17 Q. Just for the record, Mr. Rondón, this document
18 you cited in footnote 39 of your first witness
19 statement.
09:54:08 20 A. And that's the inventory conducted at the
21 headquarters of the farm.
22 Q. That's right. My point is, as you can see,
23 there's various signatures on this document, right?
24 A. Yes, I see a signature, three signatures.
09:54:24 25 Q. There's a Mr. Rivera Monzón, who you mentioned

09:54:29 1 is the lawyer?

2 A. Yes.

3 Q. There's obviously Mr. Herrera, this is the
4 police officer who received the letter that you sent on
09:54:36 5 August the 10th, yes?

6 A. Yes.

7 Q. And then you have Mr. Luis Gutiérrez, who you
8 established was the administrator at that time, yes?

9 A. Yes.

09:54:51 10 MR. MOLINA: Thank you, Mr. Ricky.

11 Q. After this inventory takes place on
12 August 14th, your security guards returned to the house
13 for the guards at the Hacienda, correct?

14 A. What I know, during the carrying out of the
09:55:25 15 inventory on that visit, they found a note in --

16 Q. Mr. Rondón, you will be able to talk about
17 whatever note you want to talk about. My question is
18 did the guards return to the house, the guardhouse at
19 the Hacienda?

09:55:37 20 A. I will defer that to Mr. -- our agronomist,
21 Luis Gutiérrez.

22 Q. Well, let's look to see what you wrote in your
23 witness statement.

24 MR. MOLINA: Mr. Ricky, do you mind
09:55:50 25 pulling up CWS-01 and go to paragraph 89, please.

09:56:00 1 Please highlight 89 to 93, please. Sorry. Thank you.

2 Q. Mr. Rondón, this is your first witness

3 statement. This is paragraphs 89 to 93. Let's start at

4 the top. You say that after this inventory, you

09:56:22 5 received a call from your contact at PRONicaragua. Do

6 you see that?

7 A. Yes.

8 Q. PRONicaragua at that time was a government

9 entity, yes?

09:56:29 10 A. It is.

11 Q. They told you you could take possession of the

12 Hacienda, and it was safe for the workers to return,

13 correct?

14 A. It's very interesting that they are saying that

09:56:36 15 it's safe for the workers to return. So that means it

16 had been unsafe before then.

17 Q. My point is that's what you were told. That

18 statement is still accurate?

19 A. For the time, yes.

09:56:50 20 Q. And then you say -- in your statement you say

21 that after receiving this call, you authorized your

22 administrator to go back, right, and to take this

23 inventory, yes?

24 A. They went to the farm to do an inventory,

09:57:02 25 correct.

09:57:03 1 Q. And then the inventory takes place and you see
2 at the bottom of 93, after the inventory, you say:

3 "I told Luis Gutiérrez to tell Raymundo
4 Palacios and Domingo Ferrufino to stay and guard the
09:57:18 5 Hacienda and inform me of any developments."

6 Do you see that?

7 A. Which paragraph there?

8 Q. We're going to highlight it for you. It's
9 paragraph 93.

09:57:30 10 A. Correct.

11 Q. Right. So after the inventory takes place, the
12 police leave the property, your guards go back into the
13 property, yes?

14 A. I will defer to Mr. Luis Gutiérrez because I
09:57:47 15 see paragraph 91 is when they found the note: "We will
16 return, and we are going to kill you for being a
17 snitch."

18 Q. Yeah, that's what it says. I'm not asking you
19 about the note. I'm trying to be helpful for the
09:58:00 20 Tribunal. I just want to make sure we understand.
21 After the inventory your guards went back in. Nothing
22 in your testimony says that there were anyone else at
23 the Hacienda at that time, correct?

24 A. People had fled for their lives.

09:58:14 25 Q. Right. So the police had already left the

09:58:17 1 property as of that time, right?

2 A. Say it again, please.

3 Q. When Mr. Palacios and Mr. Ferrufino were
4 ordered to take back the Hacienda Santa Fé as

09:58:26 5 highlighted in paragraph 93, at that point the Hacienda
6 had no more police officers inside it, correct?

7 A. I would defer that to Mr. Luis Gutiérrez.

8 MR. MOLINA: Okay. You can take down this
9 part. Keep the witness statement up, though. Take me
09:58:41 10 to paragraph 5, please, of this witness statement,
11 CWS-01.

12 Q. You testified, Mr. Rondón, that a few days
13 after this, in or around August 18, 2018, the invaders
14 returned, right?

09:59:10 15 A. Yes.

16 Q. So just, again, just to follow the timeline, on
17 August 13th police gets them out. August 14th, there's
18 an inventory with your administrator. Guards go back.
19 And then on August 18th, the invaders come back to the
09:59:28 20 Hacienda and take the Hacienda once again, yes?

21 A. Yes, they took it for good. We didn't know if
22 they had people just outside the headquarters, invaders.

23 Q. And so my question to you is we know you
24 ordered Mr. Palacios and Mr. Ferrufino to take back the
09:59:52 25 guard house at the Hacienda during this August 14th to

09:59:56 1 August 18th window. So I'm going to ask you a bunch of
2 questions about this window.

3 My first question is other than ordering
4 two of these guards to go back to that guard house, did
10:00:11 5 you ask the police, for instance, to implement
6 round-the-clock surveillance around the perimeter of
7 your Hacienda, yes or no?

8 A. I didn't speak to the police after my first
9 call on June 17, 2018.

10:00:33 10 Q. During this August 14th to August 18th period,
11 did you take any steps to hire more security guards to
12 fortify the security at the Hacienda, yes or no?

13 A. When -- if you were a worker, you're working
14 and they threaten you, it's invaded by heavily armed
10:00:56 15 people --

16 Q. Mr. Rondón, it's a yes or no. I promise you'll
17 have a chance to elaborate. Just please answer my
18 question.

19 A. Say it again.

10:01:05 20 Q. My question is simply did you take any steps
21 between August 14, 2018 and August 18, 2018 to fortify
22 the security at Hacienda Santa Fé?

23 A. Hacienda Santa Fé by then had been looted.
24 Completely looted.

10:01:23 25 Q. That's not my question, Mr. Rondón.

10:01:27 1 Did you do anything to fortify the
2 security team at Hacienda Santa Fé during that period of
3 time, yes or no?

4 A. There were no facilities for them to go. What
10:01:36 5 were they going to do, get killed?

6 Q. So the answer is no?

7 A. Of course not. I like the lives of my workers.

8 Q. Did you reach out to your investor, Riverside
9 Coffee, and say we're going to need more money because
10:01:48 10 we need to secure our Hacienda, yes or no?

11 A. I don't remember what I reached out to
12 Riverside Coffee, LLC for. I don't remember. I have no
13 recollection. But Nicaragua was not fundamentally a
14 normal country.

10:02:09 15 Q. You testified in your first witness statement,
16 paragraph 227, that you were informed by someone that,
17 as of August 2021 -- sorry, the summer of 2021 -- that
18 the police had removed all the occupiers at your
19 Hacienda, yes?

10:02:31 20 A. Mr. Luis Gutiérrez informed me that the
21 National Police started to remove invaders at Hacienda
22 Santa Fé, yes.

23 Q. Great.

24 A. Practically after three years, since it had
10:02:43 25 been confiscated and invaded. This took place due to

10:02:50 1 the letters sent by this Tribunal to the World Bank, to
2 the Ministry of Economy in Nicaragua, informing them
3 that they had --

4 Mr. Appleton, I will defer to him. He can
10:03:01 5 tell you later more about it. Due to his letter, the
6 Nicaraguan government acted. Not before.

7 Q. All right, Mr. Rondón. Thank you.

8 So let's just, again for the record, just
9 confirm. So you've confirmed that --

10:03:19 10 MR. MOLINA: And you can take that down,
11 Ricky. Thanks.

12 Q. You've confirmed that, according to what you
13 were told, the invasion began on June 16, 2018 and that
14 as of August 13, 2018, as far as you know, based on
10:03:36 15 what you were told, the invaders left the property,
16 correct?

17 A. Wama said that he stayed at the farm, so I
18 cannot say that the invaders left the property.

19 Q. I'm talking about what you put in your witness
10:03:54 20 statement.

21 A. They knew --

22 Q. Please let me -- we have simultaneous
23 translation and a court reporter. Please let me finish
24 my question.

10:04:03 25 A. Okay.

10:04:07 1 Q. In your testimony that we've just covered,
2 including the documents that Riverside's presented and
3 that you cite in your witness statement, it says that,
4 as of August 13, 2018, there's no evidence there's any
10:04:22 5 invaders inside of Hacienda Santa Fé, correct?

6 A. What we had been informed was that. But the
7 circumstances changed when you read the letter by
8 Mr. Wama saying that he invaded the farm with weapons
9 and people and that he had remained since at the farm.

10:04:45 10 Q. And we --

11 A. Which is the truth.

12 Q. And we've covered a lot of testimony about what
13 happened in the past. And what we covered is that you
14 sent a letter to the government in August 2000 asking
10:04:55 15 for them to get rid of the people at your Hacienda, and
16 it took them four years to do that. Yes?

17 A. That was under different circumstances in
18 Nicaragua.

19 Q. That's correct. There were no protests at the
10:05:08 20 time between 2000 and 2004, correct?

21 A. We had democratic governments at the time.

22 Q. Mr. Rondón, I know there's been a lot of back
23 and forth about whether or not there was an offer to
24 take back the Hacienda after it was rid of invaders and
10:05:24 25 whether or not it was a bone fide offer. I'm just going

10:05:27 1 to say put that all to the side.

2 We're an investment tribunal, and I'm here
3 in front of this Tribunal asking you. This hearing is
4 slated to end on July 12th of this month of this year.

10:05:45 5 Would you be willing, as one of the operating managers
6 of Riverside Coffee, and the chief operating officer and
7 president of INAGROSA, to take back possession of your
8 Hacienda within days of the conclusion of this hearing,
9 yes or no?

10:06:04 10 A. I will defer for that question to our
11 counselor, Mr. Barry Appleton. It's supposition.

12 MR. MOLINA: Mr. President, is this a good
13 time for a break? I don't know how long I've been
14 going.

10:06:24 15 PRESIDENT: You've been going only an
16 hour.

17 MR. MOLINA: I can keep going.

18 PRESIDENT: A convenient time to break
19 would be around 10:30, if that is convenient for you.

10:06:36 20 MR. MOLINA: Yes. I can keep going,
21 absolutely. I have a little bit more -- a little way to
22 go, so I just wanted to make sure I wasn't keeping
23 everyone up.

24 PRESIDENT: The plan is, according to the
10:06:46 25 schedule that we have one break in the morning, and the

10:06:50 1 morning runs from 9 to 12:30. But it's up to you when
2 it's a convenient time, but around 10:30 would be
3 convenient.

4 MR. MOLINA: Thank you, thank you.

10:07:07 5 Q. Okay, Mr. Rondón.

6 A. Yes.

7 Q. You've given testimony in this hearing --
8 sorry, in this arbitration about the damages that
9 Riverside alleges INAGROSA and Hacienda Santa Fé
10:07:16 10 incurred during the invasion, correct?

11 A. Yes.

12 Q. Initially, in your first witness statement, you
13 said that the invaders completely deforested the private
14 forest at the Hacienda, and you've since corrected that,
10:07:32 15 correct?

16 A. I did. However, I saw a film submitted by the
17 Respondent of the farm where I clearly see that it's
18 more than devastated the farm. They took away our
19 primary forest of 140 hectares. They took away all of
10:07:55 20 the adult standing trees that we had there. Thousands
21 of trees.

22 Q. And in your testimony -- I'm referring you now
23 to your second witness statement. I think it's 23(1.)?

24 MR. MOLINA: Do you mind, Ricky, putting
10:08:16 25 that up just so we can all follow along, please?

10:08:21 1 Q. So you see at the bottom here on 23(1) -- this
2 is from your second witness statement, paragraph 23,
3 subsection (1). Do you see that? It says
4 "Clarification on damages." I'm just going to read it
10:08:33 5 into the record:

6 "My language in paragraph 5 of the
7 management representation letter was a bit imprecise."

8 Just for the record, your reference there
9 to the "management representation letter," that's the
10:08:43 10 letter that you sent to Mr. Kotecha in 2022, correct?

11 A. I believe it could be, yes.

12 Q. So then you say:

13 "We certainly were terribly affected by
14 the June 16, 2018 invasion of Hacienda Santa Fé, but
10:09:10 15 that initial invasion resulted in limited damage to
16 INAGROSA'S overall business ..."

17 You go on to say:

18 "Our damage was suffered after the second
19 invasion of July 16, 2018, when the avocado areas and
10:09:25 20 our central operations (which were located in the lower
21 part of the Hacienda Santa Fé) were affected ..."

22 Do you see that?

23 A. Yes.

24 Q. Then you say:

10:09:34 25 "It took some time for this damage to

10:09:37 1 start as occupiers started to redistribute land and
2 decided to rip up fields of Hass avocado to plant beans
3 and other subsistence crops. Similarly, the illegal
4 logging of the forests did not start until sometime
10:09:49 5 after the second invasion. We knew that there was a
6 total deprivation of the foundational elements of our
7 business on August 14, 2018."

8 Do you see that?

9 A. Yes.

10:10:00 10 Q. So just to summarize, what you're telling --
11 what you're saying here in this witness statement is,
12 upon reflection in your second witness statement, you
13 clarify that this illegal logging that you've described
14 started sometime after July 16, 2018 and became apparent
10:10:20 15 to you and your company as of August 14, 2018, correct?

16 A. Can you repeat the question, please, again?

17 Q. Absolutely.

18 I'm just summarizing what you're saying
19 here. There's a lot of words. You're saying that
10:10:35 20 upon -- in your second witness statement you wanted to
21 clarify that you understood that this illegal logging
22 that you've been describing started sometime after
23 July 16, 2018 and became apparent to you on August 14,
24 2018, yes?

10:10:53 25 A. Yes.

10:10:54 1 Q. August 14, 2018, of course, is the date of that
2 inventory that we just described with your
3 administrator, yes?

4 A. Yes.

10:11:01 5 Q. So your testimony is that thousands of trees in
6 your private forest were logged between mid to late
7 July 2018 and mid August 2018, yes?

8 A. No. It took -- I would say, based on the
9 information that I have and United Nations satellite

10:11:31 10 reports on deforestation spots in the world, they were
11 identifying precisely Hacienda Santa Fé as being
12 deforested.

13 Q. Did you submit any of those reports with your
14 testimony?

10:11:50 15 A. I don't know if they're in part of the
16 testimony, but you can go back to see the pictures of
17 the United Nations deforestation for the years starting
18 in 2018 of Nicaragua, which has been highly deforested,
19 and 2021, and you will see Santa Fé there.

10:12:10 20 Q. I look forward to your counsel pointing us to
21 the record where those are.

22 But it says here that you learned that
23 there was total deprivation as of August 14, 2018. So
24 are you clarifying or correcting this statement?

10:12:30 25 A. What I mean to say is that after the

10:12:32 1 destruction and looting, the killing of all the tropical
2 sheep that we had is like -- and the number of people
3 that the government took there to confiscate Santa Fé is
4 like they're just playing with me, I said to myself.

10:12:57 5 Q. So I'll be candid with you. I'm fascinated by
6 this. Your testimony is that there were -- that these
7 individuals who had invaded your property took it upon
8 themselves to start logging large hardwood trees in the
9 number of thousands of them in a matter of weeks?

10:13:21 10 A. To deforest a farm the size of Santa Fé that
11 was rich in precious hardwoods, it takes an organized,
12 well-financed organization to do it. And that's what we
13 have -- what took place at Santa Fé.

14 It could not be done in two months, no.
10:13:49 15 It took years. I would hear reports from former workers
16 that would call me and tell me: "Senõr Rondón, we hear
17 ten teams of chainsaws operating inside the farm. The
18 trucks leave at night, big trucks, taking the wood out."
19 And this went on for over two years.

10:14:15 20 Q. Mr. Rondón, you have a team of lawyers who have
21 represented Riverside and who have been counseling you
22 over the course of this entire arbitration. You
23 submitted two witness statements over the course of this
24 arbitration. You have not submitted any evidence,
10:14:33 25 testimonial, documentary, or otherwise, related to

10:14:37 1 whatever reports you just mentioned. True?

2 A. True, but we haven't had access to Hacienda
3 Santa Fé. May I say something?

4 Q. I'm the one asking you questions, and you'll
10:14:52 5 have a chance to speak whenever I'm done.

6 MR. MOLINA: You can take that down.
7 Thank you, Mr. Ricky.

8 Q. You also, in your witness testimony, describe
9 alleged harm to the soil at Hacienda Santa Fé, and
10:15:16 10 specifically you state that the invaders damaged the
11 soil by planting crops such as legumes into the soil,
12 correct?

13 A. Legumes, beans, bananas, crops that are
14 incompatible with soils that would have Hass avocado on
10:15:48 15 it, because they cause diseases to it.

16 Q. Nowhere in your witness statement do you
17 identify exactly where these alleged crops were planted,
18 correct?

19 A. We can see the pictures of Hacienda Santa Fé
10:16:06 20 where it had been deforested, that they were moving, you
21 know, some of these legumes, loading them up in the
22 pickup trucks. And you can see the fields where they're
23 planted. Yes, it's visible.

24 Q. None of these pictures are attached to any of
10:16:25 25 your witness statements. True?

10:16:27 1 A. Not mine, but I -- they're part of their own,
2 the people that invaded the farm. El Chino Kuan is
3 there in many of them.

4 Q. Nowhere in your witness statement do you
10:16:41 5 identify the size of the area that was allegedly planted
6 with these crops, correct?

7 A. We don't have access to the farm. So to be
8 very precise, I cannot state based on presumption. No,
9 I can't.

10:16:57 10 Q. Right. So you have no idea where these crops
11 are planted, correct?

12 A. Oh, I can see just from the picture where it
13 is. You know, the shape of the smoothness of the
14 terrain --

10:17:12 15 Q. Let me get this straight.

16 A. -- and the color of the soil.

17 Q. Let me get this straight. The pictures you're
18 mentioning now, these are satellite pictures?

19 A. These are Sandinista pictures taken by the
10:17:22 20 invaders themselves.

21 Q. And, again, these Sandinista pictures that
22 you're describing are not attached to your witness
23 statements, right?

24 A. I don't know if they are or not. In my witness
10:17:41 25 statement, they are not.

10:17:42 1 Q. When you sent the letter to Mr. Kotecha
2 describing the alleged damage to the plantations, the
3 soil, to the Hacienda, you didn't attach these pictures
4 to that letter either, did you?

10:17:56 5 A. No, but the Sandinistas themselves described
6 very well what they were growing there. And I didn't
7 have access to the pictures. I didn't have access to
8 the farm. It's after they were published in their own
9 media.

10:18:11 10 Q. You also allege in your witness testimony that
11 the invaders destroyed or stole INAGROSA'S business
12 records, correct?

13 A. They looted the offices of INAGROSA. Took
14 everything. Everything. Computers, laptop computers,
10:18:35 15 all the records that were there, all the -- we kept the
16 papers there in file drawers. Gone. The printers.

17 Q. Just to be -- just for the record, you have not
18 gone back into the Hacienda since the invasion occurred,
19 correct?

10:18:53 20 A. I have not been to Santa Fé nor Nicaragua.

21 Q. Luis Gutiérrez, as far as you know, has not
22 gone back into the Casa Hacienda since the invasion
23 occurred, correct?

24 A. He hasn't been back to Santa Fé I believe
10:19:11 25 since -- you have to defer to ask him, but I know to the

10:19:14 1 headquarters where he went and inspected the things,
2 August 14, 2018.

3 Q. Right. So everything that you know to be
4 damaged, stolen, looted, would have been whatever
10:19:30 5 Mr. Gutiérrez identified in that inventory that we were
6 looking at dated August 14, 2018. True?

7 A. From the lower part of Santa Fé, from the
8 headquarters that was stolen and looted, yes.

9 Q. So if it's not in that signed official
10:19:46 10 inventory, you have no evidence that it happened, right?

11 A. Say that again, please.

12 Q. It was a poorly worded question. Let me try
13 again.

14 The only evidence that you know of as to
10:20:00 15 what was looted or stolen or destroyed in the Casa
16 Hacienda is based on the document that Mr. Gutiérrez
17 signed on August 14, 2018. True?

18 A. Yes, the only -- just around the headquarters,
19 yes.

10:20:16 20 Q. You've testified that in the Casa Hacienda
21 there were computers or laptops that belonged to
22 INAGROSA, yes?

23 A. Yes.

24 Q. How many?

10:20:28 25 A. You have to ask Mr. Luis Gutiérrez. I wasn't

10:20:32 1 there when, you know, all this was taking place. So you
2 asked me a question that is too vague for me to answer.

3 Q. As chief operating officer at the time of
4 INAGROSA, do you have a ballpark guess how many
10:20:51 5 computers were at the Casa Hacienda as of the time of
6 the invasion in 2018?

7 A. There was one main computer and I don't know
8 how many laptops because that's what it is, it's a
9 laptop. It's a portable computer. I don't know how
10:21:06 10 many were there.

11 Q. And it's your testimony that at the Casa
12 Hacienda, in addition to these laptops or computers,
13 there were also paper files containing business records
14 relating to the business of INAGROSA, yes?

10:21:20 15 A. Yes.

16 Q. And, again, your testimony is that all those
17 files were either stolen or destroyed, yes?

18 A. Yes. They were looking for the titles of the
19 farm, according to our workers. They wanted me to sign
10:21:39 20 the titles over to them. Can you believe that?

21 Q. So, again, going back a little bit, we've
22 already established that your testimony now is that
23 there were two waves of invasions in the summer of 2018
24 and that the second wave that started on July 16, 2018
10:21:57 25 is the one where the invaders reached the Casa Hacienda,

10:22:00 1 yes?

2 A. In the second wave, yes.

3 Q. So in other words, between June 16, 2018 and
4 July 16, 2018, there were no invaders at the Casa

10:22:10 5 Hacienda, according to your testimony, correct?

6 A. You have to -- I defer to Mr. Luis Gutiérrez.

7 Q. I'm asking you, Mr. Rondón. You've submitted a
8 witness statement on this, and we've covered it. Please
9 answer my question.

10:22:22 10 A. I believe so.

11 Q. So during the time that the invaders are not at
12 the Casa Hacienda but on your property, did you or
13 anyone at INAGROSA instruct the workers to take the
14 computers, take the files and put them in a safe
15 location, yes or no?

10:22:40 16 A. They were in a safe location. They were in the
17 locked offices in the headquarters of the farm.

18 Q. Did you give any instructions to any of your
19 workers between June 16, 2018 and July 16, 2018 to
20 remove the paper records or the computers to someplace
21 outside of the Hacienda, yes or no?

10:23:05 22 A. No. Why would I?

23 Q. I want to understand a little bit, too, about
24 INAGROSA. I think we've received testimony already, but
10:23:25 25 I want to confirm it with you. For the record, you were

10:23:29 1 the chief operating officer of INAGROSA at the time,
2 yes?

3 A. I was, yes.

4 Q. And then at that time, in the summer of 2018,
10:23:36 5 there was a chief financial officer of INAGROSA,
6 correct?

7 A. There was a chief financial officer that had
8 started for the Hass avocado project.

9 Q. That's Mr. Russ Welty, correct?

10:24:03 10 A. That's Mr. Russ Welty.

11 Q. You also had -- the president at that time of
12 INAGROSA is your late father-in-law, Mr. Melvin Winger,
13 correct?

14 A. Yes.

10:24:16 15 Q. Those are the three executives that INAGROSA
16 had as of summer 2018, yes?

17 A. There might be somebody else, but I would say,
18 yes, my wife took part, you know, when she would talk to
19 the Riverside group. If I wasn't able to talk to them,
10:24:52 20 she would talk to them and tell me their -- you know,
21 what their mind was at the time.

22 Q. And just for the record, as of summer 2018, you
23 lived in Colorado with your wife, yes?

24 A. Yes.

10:25:08 25 Q. Mr. Welty lived in Kansas, yes?

10:25:11 1 A. No. He lives in Denver, Colorado.

2 Q. My bad. He lived in Colorado, too, yes?

3 A. Yes, he lives in Denver.

4 Q. I'm asking just in that summer of 2018. That's

10:25:21 5 where he lived, in Colorado, yes?

6 A. Yes.

7 Q. And Mr. Winger lived in Kansas at that time,

8 yes?

9 A. Yes.

10:25:29 10 Q. So all these executives for INAGROSA, none of

11 them lived in the Hacienda Santa Fé, yes?

12 A. I would live there when I was there, but I was

13 not there at the time.

14 Q. So it's your testimony that INAGROSA did not

10:25:47 15 maintain any corporate records with its executives in

16 the United States?

17 A. We did not. We passed reports. I would tell

18 the reports. You have to remember -- you probably saw

19 the film -- it's pretty remote where we are. We didn't

10:26:07 20 even have government electricity until late there. And

21 we never had three-phase electricity installed for us by

22 the government. They left it 1 kilometer short. So we

23 have to run our generators there. We didn't have

24 internet.

10:26:28 25 Q. You didn't have electricity at the Hacienda

10:26:31

1 Santa Fé?

2 A. Running with our own generators but not
3 electricity.

10:26:40

4 Q. And you did not have internet at the Hacienda
5 Santa Fé?

6 A. No, we did not have internet at the Hacienda
7 Santa Fé.

10:26:55

8 Q. Now, you've mentioned that -- notwithstanding
9 that INAGROSA kept its records at Hacienda Santa Fé,
10 you've mentioned that you had a bookkeeper that
11 maintained some copies of these records, too, yes?

12 A. Yes.

13 Q. Who's the bookkeeper?

14 A. Javier González.

10:27:09

15 Q. Where is the bookkeeper located?

16 A. He was located in Managua, and he would go to
17 Santa Fé and Jinotega on punctual job assignments.

10:27:34

18 Q. You mentioned that after your first witness
19 statement, INAGROSA discovered that this bookkeeper had
20 mislabeled some boxes which happened to contain some
21 copies of INAGROSA'S business records from the relevant
22 period, correct?

10:28:03

23 A. Whatever he had, he would store in sacks or
24 boxes. I asked him to please go check them out and to
25 see if he could find more documentation for our case.

10:28:12 1 Q. And you mentioned that in your second witness
2 statement, that he was able to identify some of these
3 boxes that contained some of these records, yes?

4 A. That's correct.

10:28:22 5 Q. How many boxes?

6 A. I wasn't there.

7 Q. Did Mr. -- I'm sorry, what was his name?

8 A. Javier González.

9 Q. Did Mr. Javier González back up these records
10 in digital form?

11 A. I have no idea.

12 Q. You mentioned that INAGROSA maintained an email
13 account, yes?

14 A. I have my own email account,
10:29:00 15 cordilleracoffee@msn.com, and I used it for the business
16 purposes of INAGROSA.

17 MR. MOLINA: Mr. President, it's 10:30,
18 and I could use a biological break.

19 PRESIDENT: Let's break now then for
10:29:19 20 15 minutes, until 10:45.

21 And, Mr. Rondón, I would ask you not to
22 speak with anybody about your testimony during the
23 break. You are still under examination. You can go and
24 have a cup of coffee, but just don't speak about your
10:29:38 25 evidence.

10:29:40

1

MR. RONDON: Yes.

2

PRESIDENT: Thank you.

3

(Brief Recess)

4

PRESIDENT: Let's resume then,

10:48:03

5

Mr. Molina.

6

MR. MOLINA: Thank you, Mr. President.

7

BY MR. MOLINA:

8

Q. Mr. Rondón, before we took the break we were

9

talking about emails. You mentioned that you used an

10:48:14

10

email cordilleracoffee@msn.com, yes?

11

A. Yes.

12

Q. You testified that email was hacked at some

13

time after the invasion, yes?

14

A. Yes.

10:48:25

15

Q. Do you remember the time that it was hacked?

16

A. Could be 2019.

17

Q. And you've testified that since it was hacked,

18

it's now become unrecoverable, correct?

19

A. I try -- I'm not savvy on computer stuff, you

10:48:45

20

know, but I had a lot of people try and my wife,

21

Mr. Welty, our counselor tried to hire somebody to try

22

to see if we could recover information. Gone.

23

Q. So to the extent that you and/or Riverside

24

Coffee have submitted emails to or from that address,

10:49:17

25

those would be emails that were obtained from some other

10:49:21 1 email account, yes?

2 A. It had been obtained from Mr. Welty and from
3 Mr. Gutiérrez.

4 Q. Now, in this record, Mr. Rondón, there's also
10:49:38 5 another email address that's been affiliated with
6 INAGROSA. I'm just going to have you confirm. Are you
7 familiar with the address chicor71@yahoo.com?

8 A. Can you put it up here, please?

9 Q. Sure.

10:49:57 10 MR. MOLINA: Mr. Ricky, do you mind
11 putting up R-32 up on the screen for Mr. Rondón?

12 Q. This is an application that INAGROSA made to
13 the environmental agency MARENA in 2016. It's
14 designated as R-32. Do you recognize this document?

10:50:18 15 A. Yes, I do.

16 Q. Do you see on the front page there, there's an
17 email chicor71@yahoo.com?

18 A. Yes.

19 Q. That's an email affiliated with you?

10:50:34 20 A. It belongs to -- at the time anyway -- to
21 Mr. Francisco Rivera.

22 Q. Who's Francisco Rivera?

23 A. Francisco Rivera used to work for INAGROSA.

24 Q. What times did he work at INAGROSA?

10:50:48 25 A. He worked at INAGROSA up until April of 2018

10:50:58 1 when he took a leave of absence to be with his
2 cancer-stricken wife. He's an older gentleman. He was
3 the head of personnel for us.

4 Q. And when did he start at INAGROSA?

10:51:15 5 A. I believe he started working at INAGROSA either
6 2004 or 2005.

7 Q. So he was continuously with INAGROSA between --
8 starting in either 2004, 2005 to April 2018, yes?

9 A. That he was in Nicaragua until April 2018, yes.

10:51:44 10 Q. And he used this email address that we have
11 highlighted on the screen, yes?

12 A. Yes, that's his. Or was at the time. I don't
13 know if he's still using it.

14 Q. Did you contact Mr. Rivera and ask him to
10:51:58 15 search his email when preparing your testimony for this
16 arbitration?

17 A. Never did.

18 MR. MOLINA: Thank you, Mr. Ricky. You
19 can take this down.

10:52:18 20 Q. Now, we've covered earlier that you sent a --
21 what you call in your testimony the management
22 representation letter, which is a letter that you sent
23 to Mr. Kotecha in advance of Riverside's first Memorial
24 in this case, yes?

10:52:40 25 A. Yes.

10:52:45 1 Q. Now, in that letter -- well, actually, before I
2 get to that letter, I wanted to clarify something.

3 You testified yesterday in your direct
4 examination that during the time that INAGROSA focused
10:52:59 5 on running a coffee business, that you were in Nicaragua
6 around 50 to 60 percent of the time. Do you remember
7 saying that?

8 A. Yes.

9 Q. And you also said that during the transition
10:53:14 10 that INAGROSA made into the Hass avocado venture, that
11 you reduced the amount of time that you were in
12 Nicaragua, yes?

13 A. Yes.

14 Q. Can you estimate, between 2014 and 2018, what
10:53:30 15 was the percentage of time that you were at Hacienda
16 Santa Fé in any given year?

17 A. I would say, 2014-2018, I probably went more
18 often for very short trips. But I don't -- it was kind
19 of a fluid thing because we were transitioning to the
10:54:03 20 Hass avocado. So I was making short trips to different
21 places to see things related with the Hass avocado
22 growing, farms, seeds, equipment, getting information
23 from different people.

24 So I would say it had declined time-wise
10:54:29 25 by 30 percent.

10:54:37 1 Q. So you were there roughly 20 to 30 percent of
2 the time?

3 A. Yes.

4 Q. For the record, prior to 2014, you had no
10:54:51 5 experience running a Hass avocado plantation, correct?

6 A. That is correct.

7 Q. Prior to 2014, INAGROSA had no experience
8 running a Hass avocado plantation, correct?

9 A. That is correct.

10:55:07 10 Q. At that time your agronomist was Mr. Darwin --
11 what was the last name of Mr. Darwin?

12 A. Sobalvarro.

13 Q. Mr. Darwin Sobalvarro was the agronomist in
14 2014 at Hacienda Santa Fé, yes?

10:55:25 15 A. 2013, he was there already.

16 Q. And when did he leave?

17 A. I defer that to Mr. Luis Gutiérrez because he
18 replaced him. He became the head of the project for the
19 Hass avocado. So he will have a more exact date than I
10:55:47 20 will.

21 Q. Was he there, as far as you understand, in 2014
22 when the plantation was starting to be planted?

23 A. Darwin Sobalvarro?

24 Q. Yes.

10:56:02 25 A. Yes, he would have been there.

10:56:06 1 Q. Before 2014, did Mr. Darwin Sobalvarro have any
2 experience planting Hass avocado plantations?

3 A. No, but he was sent to Costa Rica to be trained
4 by agronomist Rodrigo Jiménez. We sent him there for --
10:56:31 5 many times during 2013 and some of the times for
6 three months -- one time for three months to be trained
7 in the grafting and cultivation of Hass avocado.

8 Q. So now I want to talk about, you've
9 mentioned -- sorry.

10:56:53 10 You've mentioned in your testimony that
11 there was a -- there were some trees that were planted
12 in 2014 in Hacienda Santa Fé that had been grafted with
13 Hass avocado saplings, yes?

14 A. Starting in January 2014, yes.

10:57:11 15 Q. And you've clarified in your second witness
16 statement that the entire 40-hectare plantation was not
17 planted all at once but, rather, in stages between 2014
18 and 2016, correct?

19 A. I will make a correction. The last grafting we
10:57:32 20 did, I believe, was in 2017. So putting to the field,
21 more likely all of it by late 2016, and we did some
22 grafting in the field as well in 2017.

23 Q. And you've testified that it takes three years
24 for these crops to have their first harvest, correct?

10:58:00 25 A. Could you show me, please, that?

10:58:03 1 Q. I'm just asking if that's a time frame that
2 you're familiar with?

3 A. Well, avocado -- you know, Hass avocado is --

4 MR. HILL: Mr. President, I object. He
10:58:21 5 did ask him the question as to whether or not he had
6 made a statement in his witness statement. And the
7 witness asked to be shown the witness statement, and
8 instead, Mr. Molina went off on a different question. I
9 think it's fair to the witness that he be shown the
10:58:33 10 witness statement that was referred to.

11 PRESIDENT: That's fair enough.

12 MR. MOLINA: I will just move on. I was
13 trying to get somewhere else, but I'll just get there
14 faster.

10:58:44 15 PRESIDENT: You can come back to it on
16 redirect.

17 Q. Let's look up --

18 MR. MOLINA: Mr. Ricky, let's look up your
19 first witness statement. First witness statement of
10:59:02 20 Mr. Rondón, paragraph 206, please. Could you please put
21 up paragraph 206? Thank you.

22 Do you see on the screen there's a
23 reference to there was an expectation that the first
24 harvest would have of around 20 kilograms per tree?

11:00:08 25 A. Yes.

11:00:09 1 Q. So your expectation was that the first harvest,
2 the trees -- each tree would have roughly that amount,
3 correct?

4 A. Correct.

11:00:20 5 Q. And you've testified in this case that the
6 first harvest occurred in 2017, yes?

7 A. Yes.

8 Q. And you've testified that it was very
9 successful, yes?

11:00:33 10 A. Yes.

11 Q. Can we assume that means that the trees that
12 harvested in 2017, on average, had roughly 20 kilos of
13 Hass avocado fruit?

14 A. I would defer that to ingeniero Luis Gutiérrez.
15 He will have the figures for it.

16 MR. MOLINA: Thank you, Mr. Ricky.

17 Q. You've testified that during the coffee days,
18 that you used to have up to 1500 workers assist INAGROSA
19 in harvesting coffee during the harvest season, yes?

11:01:19 20 A. Yes.

21 Q. And you've also testified that in 2018, for the
22 2018 harvest of the Hass avocado plantation, you
23 anticipated that INAGROSA would have to hire 60 to 80
24 more workers to assist in the harvest for that year,
11:01:34 25 yes?

11:01:35

1 A. Yes.

2 Q. How many field workers worked at Hacienda
3 Santa Fé as of June 2018?

4 A. To be precise, I would defer to ingeniero Luis
11:01:48 5 Gutiérrez.

6 Q. 20?

7 A. I would defer to him.

8 Q. You've put in the --

9 MR. MOLINA: Why don't we put up --

11:01:58

10 Mr. Ricky, why don't we put up C-55, and specifically
11 why don't we put up paragraph 21, please. Sorry, do you
12 mind going to the first page first, sorry, just to
13 establish?

14 Q. Mr. Rondón, you're being shown what's been
11:02:34 15 marked as C-55. It's a letter from Riverside Coffee to
16 Mr. Vimal Kotecha of Richter, Inc. on September 12,
17 2022. Do you see that?

18 A. Yes.

19 Q. Do you recognize this letter?

11:02:47

20 A. Yes, I do.

21 Q. You signed this letter, correct?

22 A. Correct.

23 Q. Did you draft this letter?

24 A. I drafted the letter with input from my

11:03:03

25 attorney, Mr. Barry Appleton.

11:03:07 1 MR. MOLINA: If you go to paragraph 21,
2 please, Mr. Ricky.

3 Q. Okay. So this is a letter where you're telling
4 Mr. Kotecha of Richter that you estimated for the
11:03:24 5 avocado harvest periods that INAGROSA would have to
6 augment its workforce by an additional 60 to 70 workers
7 and also seven field operators, yes?

8 A. Yes.

9 Q. When is the harvest period for Hass avocados?

11:03:48 10 A. In Nicaragua, because of the latitude that
11 we're in, there is a window that goes from about, I
12 would say, July -- July, August, September -- and you
13 could start a little earlier than July and finish a
14 little later into October. Remember, it's nature's
11:04:15 15 bounty that's giving you. It's not a factory, on-off.
16 So you can always estimate time like that as we did with
17 coffee.

18 Q. So roughly between July and October?

19 A. Correct. Maybe even June. June to October.

11:04:34 20 Q. There's pictures in this record of you with
21 field workers in 2017 at Hacienda Santa Fé posing with
22 Hass avocado fruits. Do you remember that?

23 A. Yes.

24 Q. So you visited the Hacienda during the harvest
11:04:54 25 season in 2017, correct?

11:04:55 1 A. Yes, I was there.

2 Q. How many workers do you remember being there at
3 that time?

4 A. You can see the picture. You can count the
11:05:06 5 workers that were in the field, and then to that, you
6 have to add the administration workers, you have to add
7 the security detail at the farm, you have to add the
8 tractor drivers, the truck driver, you know. I cannot
9 tell you off of my mind just like that. Ask

11:05:31 10 Mr. Gutiérrez.

11 Q. If we looked -- you're aware that Riverside
12 Coffee submitted employment records for the relevant
13 periods in this case, correct?

14 A. Say the question again, please.

11:05:53 15 Q. You're aware that Riverside Coffee has produced
16 in this record the worksheets for INAGROSA'S workers
17 between 2014 and 2018, yes?

18 A. Yes.

19 Q. So if we were to refer to those worksheets,
11:06:11 20 we'd know exactly who was at the Hacienda working on
21 those plantations at any given time, yes?

22 A. Yes.

23 Q. And if there's no one -- and there's no one
24 else who would have worked during those -- at that
11:06:28 25 plantation during that time who's not on those

11:06:31 1 worksheets, correct?

2 A. There are some people that because they
3 don't -- they just come to do a very short amount of
4 time, are contracted. And you can do it according to
11:06:45 5 law.

6 MR. MOLINA: Mr. President, I'm about to
7 enter into a confidential line of questioning.

8 PRESIDENT: Okay. We go confidential.

9 MS. CONOVER: The session has been closed.

11:07:07 10 Q. Mr. Rondón, INAGROSA -- let me start that
11 again.

12 Riverside's presented in this arbitral
13 record financial records belonging to INAGROSA, correct?

14 A. Correct.

11:07:27 15 Q. I'm going to walk through all three which have
16 been produced. I'm going to ask you some questions
17 about them, okay? The first one is C-62.

18 MR. MOLINA: Ricky, please put that on the
19 screen.

11:07:48 20 Q. Mr. Rondón, this is an exhibit that's been
21 marked C-62. It was presented by Riverside, and it's
22 dated September 2015. Do you see it?

23 A. I see it.

24 Q. You see that it purports to contain financial
11:08:01 25 information related to INAGROSA from this period?

11:08:04

1

A. Yes.

2

Q.

3

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11:08:20

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[REDACTED]

11:14:52

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[REDACTED]

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[REDACTED]

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Q. Mr. Rondón, in your testimony you've also

11:15:11

15

indicated that INAGROSA had plans to export Hass

16

avocados to the United States. Is that right?

17

A. Amongst others, yes.

18

Q. In your original witness statement, this is

19

CWS-1, you identified that you planned for INAGROSA to

11:15:31

20

enter the US market in or around 2020, correct?

21

A. Correct.

22

Q. And in your second witness statement you

23

clarified that, really, the plan was to enter the US

24

market in or around 2022, yes?

11:15:46

25

A. Yes.

11:15:51 1 Q. It took you -- let me ask. Was it a -- you
2 don't really say in your second witness statement. Did
3 you just misremember when you reported in your first
4 witness statement that the plan for INAGROSA was to
11:16:05 5 enter the US market in 2020?

6 A. I don't know how to phrase it. What I know is
7 that we were planning to enter the US market, and in
8 order to enter the US market, you have to pass the
9 inspections required by the USDA Department of
11:16:35 10 Agriculture and then be published in the Federal
11 Register.

12 Q. Right. And you were aware, as chief operating
13 officer of INAGROSA, that the US, at all relevant times,
14 banned Nicaraguan avocado exports, correct?

11:17:04 15 A. A ban is something like it is something -- I
16 don't look at it that way. It didn't have permit from
17 the USDA to enter the United States.

18 Q. Right. So whatever word you want to use, you
19 understood, as of June 2018, that if you tried to export
11:17:26 20 avocados from Hacienda Santa Fé to the United States,
21 that that effort would be unsuccessful, correct?

22 A. I knew it could not be done. I wasn't going to
23 do it.

24 Q. And you don't mention this ban or this
11:17:43 25 restriction, we'll call it, anywhere in your first

11:17:46 1 witness statement. True?

2 A. I do not, I believe.

3 Q. You did not mention this restriction anywhere

4 in your representation letter to Mr. Kotecha, correct?

11:17:55 5 A. I believe so.

6 Q. You believe you did?

7 A. I believe that that is like it's stated in

8 Mr. Kotecha's report that I wrote to him.

9 Q. I'm sorry?

11:18:07 10 A. Repeat the question.

11 Q. Yeah, my question is you did not indicate in

12 the representation letter to Mr. Kotecha that there was

13 a restriction by the US on Nicaraguan avocados, yes?

14 A. Can you refresh me putting up the letter to

11:18:30 15 Mr. Kotecha, please?

16 Q. We can put it up. My question is it's not in

17 there, but if you want to refresh your memory, we'll be

18 happy to put it up and give you a minute to look over it

19 again.

11:18:44 20 MR. MOLINA: Ricky, do you mind putting up

21 C-55?

22 A. One more page, please. One more, please. One

23 more, please. One more, please. One more. One more.

24 Okay. The question, please?

11:20:58 25 Q. Actually, yeah, if you just go to page 8, if

11:21:01 1 you go specifically to paragraphs 34 and 35 of this
2 letter, I think here you mentioned this plan to export
3 to the United States.

4 So just for the record, in these
11:21:13 5 paragraphs you were advising Mr. Kotecha that you'd
6 commenced a process to obtain approval from the United
7 States to export your avocados and that you expected
8 that this approval would be obtained no later than late
9 2019. Do you see that?

11:21:32 10 A. Yes.

11 Q. And, in fact, in the paragraph underneath that,
12 you said there was a plan to ship to the Port of
13 San Francisco and also to Boston and Baltimore on the
14 east coast, yes?

11:21:49 15 A. Yes.

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

18 Q. But you knew that as of June 2018, there was no
19 indication that you would get that approval as of the
11:22:07 20 time frame that you were instructing Mr. Kotecha at that
21 time, right?

22 Let me retract that. That was a terrible
23 question.

24 You knew, in 2018, that there was no
11:22:22 25 evidence that the ban would be lifted by late 2019.

11:22:28 1 Isn't that right?

2 A. We knew that we could not export in the year
3 2018, and like you stated somewhere else, it would be
4 reachable by, what is it, 2022 that you mentioned before
11:22:48 5 or earlier?

6 Q. You remember that, in 2016, you were asking
7 your senator in Colorado for assistance in this effort,
8 right?

9 A. Yes.

11:23:02 10 Q. You remember that you asked the senator's
11 office to put you in touch with the right folks in the
12 US government to see if you could obtain approval to
13 export avocados from Hacienda Santa Fé to the United
14 States, yes?

11:23:18 15 A. Yes.

16 Q. And you received no response from the senator's
17 office in or around October 2016 that said you had to go
18 to Nicaragua to get that approval. Do you remember
19 that?

11:23:31 20 A. I don't quite see it like you're seeing it. I
21 don't think it states that. Can you please show it to
22 me?

23 MR. MOLINA: Ricky, please put up C-466.

24 Q. For the record, Mr. Rondón, we're showing you
11:23:51 25 what has been designated as C-0466. It's an email chain

11:23:56 1 from October 2016. Do you see that?

2 A. Yes, I see it.

3 Q. You're familiar with this email chain?

4 A. Say it again, please.

11:24:07 5 Q. Are you familiar with this email chain?

6 A. Yes.

7 MR. MOLINA: If you go to the bottom of
8 this email chain so we can start in chronological order,
9 Mr. Ricky, all the way in the second page. Thanks.

11:24:26 10 Q. Mr. Rondón, do you see on the right part of the
11 screen there's an email from cordilleracoffee@msn.com to
12 a Laura Sherman? Do you see that?

13 A. Yes, I see it.

14 Q. And as you've already established, the
11:24:45 15 cordilleracoffee@msn.com is your email address?

16 A. Yes, I see it.

17 Q. You're also copying Mr. Russ Welty. Do you see
18 that?

19 A. Yes.

11:24:56 20 Q. We're going to make it a little bit bigger.

21 So here you're asking that you'd like to
22 get certified by the USDA to allow the importation of
23 avocados into the US. Do you see that?

24 A. Yes.

11:25:14 25 Q. And then -- so that was on September 22, 2016

11:25:18 1 that you sent that email, yes?

2 A. Yes.

3 Q. So now on the left side of the screen, about a
4 month later, on October 18, 2016, you get a response
11:25:34 5 from Laura Sherman, correct?

6 A. Yes.

7 Q. Just for the record, who's Laura Sherman?

8 A. Can you bring it down? I believe she works for
9 Senator Bennett's office here in Washington.

11:26:06 10 Q. So she responds to your question about being
11 certified, and she says I'm sorry it's taken this long.
12 "It's taken a while to track down the right people at
13 USDA/FSA who have knowledge of this program," right?

14 And then she says:

11:26:26 15 "Below is the information I was able to
16 obtain from those people."

17 MR. MOLINA: And I'm going to ask
18 Mr. Ricky to blow up the part that starts "From FSA" all
19 the way down to the bottom of the page, please. All the
11:26:45 20 way down, thank you.

21 Q. So this is the information that she provided to
22 you from the folks at the USDA, yes?

23 A. Yes.

24 Q. And they're telling you that --

11:27:01 25 MR. MOLINA: If you could highlight the

11:27:02 1 sentence I'm about to read, Mr. Ricky, just so everyone
2 is following along.

3 Q. "They told me Nicaragua does not have market
4 access for avocados and has not requested market
11:27:15 5 access."

6 Do you see that part?

7 A. That is correct.

8 Q. Then it says:

9 "According to APHIS", which has been
11:27:24 10 defined above in that email as the Animal and Plant
11 Health Inspection Service, "the Nicaraguan industry
12 would need to go to the Nicaraguan National Plant
13 Protection Organization and [that organization] would
14 need to request access to the US market and indicate
11:27:43 15 where avocados fall on their priority list to be
16 reviewed by APHIS for import certification."

17 Do you see that?

18 A. Yes, I see it.

19 Q. Then in the second paragraph they put you in
11:27:55 20 touch with a Mr. Erik Hansen, who's based out of
21 Costa Rica, and it's indicated here that he may have
22 access to the right people in Nicaragua to put you in
23 touch to get this process started. Do you see that?

24 A. Yes, I see it.

11:28:15 25 Q. Now, we looked, and in this record this is sort

11:28:17 1 of where this email or this effort ends, so I'm going to
2 ask you what did you do following this email to try to
3 get import certification from the US?

4 A. I spoke to Erik Hansen and -- can you give me
11:28:41 5 the date of that, please?

6 Q. This is dated October 18, 2016.

7 A. I spoke to him, and he said to me that once you
8 had the plantation, all of it producing, he would
9 schedule a trip with us to come to inspect the farm and
11:29:13 10 carry out instructions for recommendations that he would
11 give us on what the following steps would be.

12 We were at the point where we had only a
13 small portion that was going to be bearing fruit for the
14 2017 year, first crop, and so we left it at that. When
11:29:42 15 we were really starting it, it was a different officer.
16 It was no longer Erik Hansen, and then the invasion took
17 place. The confiscation took place.

18 But what I understand from the USDA
19 officers based in Costa Rica is that it is quicker if it
11:30:12 20 is made by a US company owned by US citizens and a
21 single farm.

22 Q. So you said a lot. Let's unpack all that.

23 So you said there was a visit?

24 A. No, I said we were going to schedule a visit.

11:30:30 25 Q. So you said -- let's take even a step back

11:30:33 1 further. You said you did reach out to Mr. Erik Hansen,
2 yes?

3 A. Yes, I did.

4 Q. Just for the record, you don't mention this
11:30:41 5 communication with Mr. Hansen anywhere in your
6 testimony, correct?

7 A. I took him to the farm.

8 Q. My question is did you mention --

9 A. I don't remember.

11:30:55 10 Q. You don't remember mentioning it anywhere in
11 your witness statements, correct?

12 A. Yes.

13 Q. You understand that you didn't attach any
14 documents to your witness statements memorializing any
11:31:04 15 communication with a Mr. Hansen, correct?

16 A. I don't remember.

17 Q. In fact, you don't mention that you reached out
18 to anyone at the USDA to set up a visit of Hacienda
19 Santa Fé, correct?

11:31:28 20 A. I spoke to Mr. Hansen. He told me what I just
21 said.

22 Q. I understand that's what you're saying now. My
23 question is what you wrote down in your two witness
24 statements.

11:31:34 25 A. Say it again.

11:31:35 1 Q. What you just said now, is it located in your
2 witness statements?

3 A. I don't understand your question.

4 Q. Prior to today, have you presented any
11:31:47 5 testimony memorializing any effort to schedule some
6 visit with Mr. Erik Hansen from the USDA?

7 A. To us, that was the initial process. We needed
8 to have more avocados --

9 Q. Is the answer yes or no? Mr. Rondón, it's a
11:32:07 10 very specific question. We just want to establish a
11 record here.

12 You just indicated there was a
13 communication to Mr. Hansen to schedule a field visit.
14 My only question is did you include that in your witness
11:32:22 15 statements?

16 A. I don't believe so.

17 Q. Okay. Now, in this document that we're seeing,
18 APHIS is telling you that the process to get the
19 certification is to reach out to the Nicaraguan National
11:32:40 20 Protection Organization. So my question to you is did
21 you reach out to the Nicaraguan National Plant
22 Protection Organization, yes or no?

23 A. I spoke to the fellow in charge for the avocado
24 section of the Nicaraguan IPISA sometime after our first
11:33:09 25 harvest of Hass avocado in the fall of 2017 at a reunion

11:33:22 1 where I became a member of the Nicaraguan Avocado
2 Growers Cooperativa.

3 Q. So the answer is, yes, you did reach out to
4 this organization?

11:33:32 5 A. Yes, I spoke to him.

6 Q. When did you speak to him?

7 A. I spoke to him about that we were getting seeds
8 for root stock from Mexico, from Mevi, and that we were
9 getting also root stock from Mexico and that I also was
10 going to get --

11:33:51 11 Q. Mr. Rondón, my question is they're telling you
12 here you want to get this import certification --

13 MR. HILL: Mr. President, he was answering
14 the question. He should not be interrupted.

11:34:08 15 PRESIDENT: He wasn't answering the
16 question. The question was when did you speak with him?

17 A. I spoke to the Nicaraguan officer for the
18 Nicaraguan Phytosanitary for Avocados in the fall of
19 2017.

11:34:24 20 Q. Same question I've asked you before. Did you
21 include the testimony you've just given now in any of
22 your witness statements, yes or no?

23 A. No, it's not.

24 Q. Have you produced any evidence memorializing
11:34:35 25 this communication, yes or no?

11:34:36 1 A. No, I did not.

2 Q. Did the Nicaraguan Phytosanitary Agency start
3 this -- do you know if the Nicaraguan agency ever
4 started the process with APHIS to try to give Nicaraguan
11:35:01 5 businesses, such as INAGROSA, the ability to export
6 avocados to the United States, yes or no?

7 A. What we spoke about was imports of root stock
8 for Hass avocado seeds and grafting shoots --

9 Q. So the answer is no?

11:35:23 10 A. -- and the United States. We weren't talking
11 about the export, no.

12 MR. MOLINA: Thank you. You can take that
13 down.

14 Q. All right. Mr. Rondón, you testified in this
11:35:48 15 case that the plan for INAGROSA was to expand its
16 40-hectare plantation up to 1,000 hectares at Hacienda
17 Santa Fé, correct?

18 A. Yes.

19 Q. And that was going to happen over a period of
11:36:04 20 some years after 2018, yes?

21 A. Yes.

22 Q. And, for the record, Hacienda Santa Fé is
23 roughly 1100 to 1200 hectares in size, yes?

24 A. I object to what you're saying. Hacienda
11:36:26 25 Santa Fé, according to the registry of the property in

11:36:30 1 the City of Jinotega, has 1,896.7 manzanas, which equals
2 1341 hectares.

3 Q. Okay. Why don't we put up R-32, please?

4 A. And that's a very important statement what I
11:36:53 5 just made because I got by the registry --

6 Q. Mr. Rondón, I didn't ask you a question. You
7 can talk on your time. This is my time.

8 MR. MOLINA: Put up the original next to
9 the English language translation, please.

11:37:09 10 Q. So, Mr. Rondón, I'm showing you what has been
11 designated R-32. That is an application by INAGROSA to
12 the environmental agency MARENA in Nicaragua. Do you
13 recognize this document?

14 A. I see it, yes.

11:37:25 15 Q. Yes. So you see that it is an application to
16 have Hacienda Santa Fé designated as a private wildlife
17 reserve, correct?

18 A. That is correct.

19 Q. And you see at the bottom of that first page
11:37:40 20 there's a prompt for the area of the Hacienda. Do you
21 see that?

22 A. Yes.

23 Q. And you see that INAGROSA filled out that the
24 Hacienda measures 1,142.5 hectares. Do you see that?

11:38:00 25 A. This was filled out by Mr. Rivera. He had no

11:38:04 1 knowledge of the size of the Hacienda Santa Fé according
2 to our legal abstract from the registry in the City of
3 Jinotega for the registry of property. Which, by the
4 way --

11:38:20 5 Q. Mr. Rondón, you can talk on your own time.

6 MR. MOLINA: Mr. Ricky, can you leave up
7 the document but take out the blow-up, please?

8 Q. This is filled out on behalf of INAGROSA,
9 correct?

11:38:36 10 A. Yes, it was.

11 Q. So INAGROSA -- this is in 2016, yes?

12 A. It is.

13 Q. In fact, if you go to the second page, we have
14 an exact date. It says for place and date, says

11:38:52 15 Jinotega May 26, 2016, yes? And why don't you look at
16 it in the original, too, Ricky so that we can see the
17 signatures. Do you see that? So May 26, 2016, yes?

18 A. And the signature is Francisco Rivera.

19 Q. And at that time Francisco Rivera was the
11:39:16 20 administrator of Hacienda Santa Fé, correct?

21 A. Head of personnel.

22 Q. Head of personnel.

23 Just so I understand, INAGROSA -- and
24 again, you were the chief operating officer -- so

11:39:28 25 INAGROSA was trying to seek a designation from MARENA to

11:39:37 1 be a private wildlife reserve, yes?

2 A. Along the lines of the Jaguar lodge, yes.

3 Q. Right. And so, in here, there are some prompts
4 that are filled out in handwriting on the original and
11:39:57 5 have been transcribed and translated into English on the
6 left. Do you see that?

7 A. Some prompts, you said?

8 Q. Let me just ask. At the top it says "What is
9 the intended purpose for the area?" And the person that
11:40:19 10 filled out this form, Mr. Rivera, wrote:

11 "To preserve the forest area, protect
12 water sources to provide a habitat for both fauna and
13 flora and thus protect all the animals living in the
14 forest."

11:40:34 15 Yes?

16 A. Yes, along the lines of the Jaguar Lodge.

17 Q. And do you see that it says -- further down it
18 says: "Environmental reasons why the property should
19 become a private wildlife reserve" and the response was:

11:40:51 20 "We are a company seeking to protect not
21 only Santa Fé from logging and the hunting of wild
22 animals, but also the natural habitat. We also seek to
23 protect and preserve water sources, as there are many of
24 them."

11:41:06 25 Do you see that?

11:41:07

1 A. Yes.

2 Q. And you're familiar that, following this
3 application, INAGROSA, along with several organizations,
4 submitted studies and plans to MARENA in support of this
5 application, correct?

11:41:20

6 A. Yes.

7 Q. And you're aware that in February 2018, MARENA
8 approved the application and issued a resolution
9 designating Hacienda Santa Fé as a private wildlife
10 reserve, correct?

11:41:32

11 A. I was not aware of it. MARENA never called
12 anybody from INAGROSA to speak of a resolution, to speak
13 of approval. What I had was hearsay news from the owner
14 of Jaguar Lodge, Mr. Georges Duriaux.

11:41:57

15 Q. Between the date of this application and the
16 June 2018 date --

17 A. That is correct.

18 Q. I haven't asked my question yet, Mr. Rondón.

19 Between the date of this application and
20 the June 2018 date, did INAGROSA ever withdraw its
21 application to MARENA to have its Hacienda designated as
22 a private wildlife reserve, yes or no?

11:42:07

23 A. We had no knowledge of this.

24 Q. That's not my question, Mr. Rondón. Listen to
25 my question.

11:42:25

11:42:26 1 A. How can you do something that you don't know?

2 Q. Mr. Rondón, that's not my question. Listen to
3 my question.

4 We established that INAGROSA submitted an
11:42:32 5 application to MARENA, right? That's what we're looking
6 at?

7 A. Yes.

8 Q. My question is did INAGROSA ever withdraw this
9 application, yes or no?

11:42:44 10 A. This application here?

11 Q. Yes. Did it ever indicate to MARENA, never
12 mind, we no longer seek this designation?

13 A. MARENA did not communicate with us.

14 Q. That's not the question I'm asking. Please
11:42:55 15 listen to my question.

16 A. We did not. Since MARENA didn't communicate
17 with us, we never withdrew anything. We were expecting
18 that --

19 Q. Mr. Rondón, I promise you you'll have plenty of
11:43:07 20 time to talk about whatever you want to talk about with
21 respect to this document. Just for the record --

22 PRESIDENT: Please, Mr. Rondón, listen
23 carefully to the question and answer the question. It
24 will be over a bit more fast. This is taking a bit
11:43:23 25 longer than has been anticipated actually. For your

11:43:26 1 information, Mr. Molina, it's for you to manage your
2 time budget, but we are now some half an hour beyond the
3 time you have allocated for this examination.

4 MR. MOLINA: I am literally about to
11:43:38 5 finish, Mr. President. I just want to get this answer
6 to my question.

7 PRESIDENT: I'm not rushing you. I'm just
8 letting you know it's for you to manage your time
9 budget, not for the Tribunal.

11:43:49 10 MR. MOLINA: I appreciate that. Thank
11 you, Mr. President.

12 Q. Again, Mr. Rondón, just for the record, the
13 question is did INAGROSA ever withdraw its application
14 to have Hacienda Santa Fé designated as a private
11:44:07 15 wildlife reserve? Yes or no?

16 A. No, we did not. No.

17 MR. MOLINA: Thank you. I pass the
18 witness.

19 PRESIDENT: Thank you very much. It will
11:44:27 20 be Mr. Hill doing the redirect?

21 MR. APPLETON: A logistical question. We
22 anticipated about an hour of time, and we've just
23 completed a considerable period of time between last
24 night and tonight. Would you give us a few minutes just
11:44:41 25 to collect our thoughts if you want us to proceed? Or

11:44:44 1 would you like to just take the break a little earlier
2 because we're close to it? It's whatever you would
3 prefer. We'll need a couple moments anyway, but we can
4 stay in place.

11:44:59 5 PRESIDENT: Let's have a break now so that
6 you can gather your thoughts, no problem. Let's say for
7 ten minutes?

8 MR. APPLETON: Perfect.

9 PRESIDENT: And then we resume at five to
11:45:11 10 noon.

11 MR. APPLETON: And when would you like to
12 take a lunch break because -- do you want to proceed
13 completely through this before we do lunch, or would you
14 like to start, take a break and come back?

11:45:21 15 PRESIDENT: It depends on how long you
16 need. We can have the lunch break around 12:30 or 1:00.

17 MR. APPLETON: I'm told that he's
18 anticipating it will be more than an hour, perhaps an
19 hour and a half, maybe even -- so it will take some
11:45:41 20 time, and as you see, we have a witness who has a lot to
21 say on our time. So I think that we should anticipate
22 where you want lunch so we can advise the witness that's
23 going to come.

24 PRESIDENT: If it's not clear that you'll
11:45:55 25 be able to finish by 1:00, let's then break at 12:30 for

11:46:01 1 lunch and -- around that time when it's convenient for
2 you, and we'll continue after lunch.

3 MR. APPLETON: We think that's very
4 sensible. Thank you.

11:46:12 5 PRESIDENT: So we'll break now for
6 ten minutes, until 11:55.

7 *(Brief Recess)*

8 PRESIDENT: Let's resume, Mr. Hill. We
9 will now go on until 12:30, whenever there is a
11:58:58 10 convenient time for you to break around that time, let
11 us know.

12 MR. HILL: Thank you.

13 **REDIRECT EXAMINATION**

14 BY MR. HILL:

11:59:04 15 Q. Good morning, Mr. Rondón. I was just checking
16 to see if we were still before noon.

17 A. Good morning.

18 Q. I'm now going to ask you some questions on
19 redirect. To remind the panel, because I haven't been
11:59:18 20 here that much, my name is William Hill.

21 Mr. Rondón, you were asked a number of
22 questions by Mr. Molina about the use of the word
23 "paramilitaries" in your first witness statement. Do
24 you remember that?

11:59:29 25 A. Yes.

11:59:33 1 Q. And not using it or not using it as much in
2 your second witness statement. Do you remember that?

3 A. Yes.

4 Q. Do you know or did you care, when you heard
11:59:44 5 that there were armed invaders coming onto your
6 property, whether they were young invaders or older
7 persons who were invading?

8 A. They were older persons when I heard some of
9 the names mentioned.

12:00:03 10 Q. Did it matter to you whether they were younger
11 or older when they were invading?

12 A. When I knew that they were older and I
13 recognized some of the names, then it did matter because
14 I knew who they worked for.

12:01:15 15 Q. Mr. Rondón, you described a murder that took
16 place on your property of your manager, correct?

17 A. Yes.

18 Q. And this was back during the first time that
19 people had occupied the properties, correct?

12:01:32 20 A. Correct.

21 Q. Could you describe in more detail the murder,
22 what occurred, who carried out the murder and what
23 happened as a result? First of all, approximately when
24 was it?

12:01:55 25 A. Fall of 1992.

12:01:56 1 Q. And who committed the murder?

2 A. The murder was committed by a group of rearmed
3 former members of the Nicaraguan resistance, led by
4 Nortiel. They also were engaged in the destruction of
12:02:18 5 the infrastructure at the farm.

6 Q. Do you know what happened to that gentleman who
7 performed the murder?

8 A. I believe that the announcement came in the
9 newspapers in Nicaragua that the army gave him hot
12:02:46 10 pursuit, and January 1st of 1993 he had died in a
11 shoot-out with the army.

12 Q. And where did the shoot-out occur?

13 A. I don't remember exactly, but it was in the
14 northern part of Nicaragua.

12:03:07 15 Q. It was not on your property?

16 A. No, it was not.

17 Q. You were asked some questions about why you
18 didn't commence an eviction process in 2018 or
19 thereafter, after the second invasion. Do you remember
12:03:27 20 that?

21 A. Yes.

22 Q. As compared to 2003 -- 2001 through 2003 when
23 there was an eviction process, correct?

24 A. Yes.

12:03:40 25 Q. Why not do the same thing in 2018?

12:03:45 1 A. Because I feel that Nicaragua is a lawless
2 country. There is no law and order in Nicaragua. It is
3 just a plain dynastic dictatorship.

4 Q. Does that include the courts?

12:04:02 5 A. I didn't understand your question.

6 Q. When you say a dictatorship, they have a court
7 system, correct?

8 A. The courts measure justice like a rubber band.
9 A little more here, a little more there, you know. It's
12:04:16 10 not justice because the system is just -- is just being
11 used with the name of court.

12 Q. We're going to pull up R-61. You were asked
13 some questions about this letter. If we can do the
14 Spanish also.

12:05:22 15 Now, this is a letter to you from the
16 Ministry of the Treasury and Public Credit. Is that
17 right?

18 A. Yes.

19 Q. And it gives you some details about the
12:05:35 20 conflict involving the Santa Fé property and the
21 Jinotega department and the members of El Pavón.

22 First of all, first question is was there
23 a conflict between your company and the actual
24 occupiers?

12:05:55 25 A. The conflict was between the occupiers and the

12:05:59 1 government of Nicaragua, who had promised them land
2 and --

3 Q. Go ahead.

4 A. -- and they hadn't been satisfied because the
12:06:13 5 government, according to them, hadn't met their
6 expectations. But we never had any conflict with them.

7 Q. To your knowledge, did they ever bring any kind
8 of lawsuit or any legal proceeding to actually take
9 title to your land?

12:06:33 10 A. Never. They knew that it was a private land,
11 and they would talk among themselves, and there are
12 statements that they would admit it that it was private.

13 Q. It also mentions in the second paragraph that
14 there was a suggestion that the value of the
12:06:53 15 improvements should be assessed by experts from the
16 government. Do you know if that ever happened?

17 A. It never happened.

18 Q. But you did actually pay compensation, did you
19 not?

12:07:04 20 A. We did.

21 Q. Do you remember how much?

22 A. In US dollars, a little over \$35,000.

23 Q. And you --

24 A. At the time.

12:07:14 25 Q. And did you actually make the payment?

12:07:17 1 A. We did.

2 Q. Now, this letter, as it says, is filling you in
3 on developments regarding the occupation, correct?

4 A. Yes.

12:07:29 5 Q. And the removal of the occupants, correct?

6 A. Yes.

7 Q. And it says "Administrative procedures" -- down
8 at the bottom, "Administrative procedures are being
9 carried out at all levels for the purpose of settling
10 the dispute."

11 Do you see that?

12 A. Yes.

13 Q. During the invasion and the time that your
14 property was held by the invaders from 2018 forward, did
12:07:52 15 you ever get a similar letter like this from anyone in
16 the Nicaraguan government?

17 A. Never.

18 Q. Anyone from the police?

19 A. Never.

12:08:02 20 Q. Anyone from the Attorney General's office?

21 A. We got a letter from the Nicaraguan Attorney
22 General. That you have to -- I defer to our attorney,
23 Barry Appleton. When they took ownership of half of
24 INAGROSA without notifying first INAGROSA, they just
12:08:36 25 assigned themselves 50 percent. The technicalities,

12:08:39 1 Mr. Appleton can spell them better than me.

2 Q. Do you remember the date of that letter that
3 you're describing from the Attorney General to
4 Mr. Appleton?

12:08:54 5 A. I believe it's sometime in 2022.

6 Q. Okay. We'll come back to that.

7 During 2018, during the initial occupation
8 in June, was INAGROSA ever consulted by the police
9 regarding what they were doing to try to remove the
10 occupiers, the invaders?

12:09:52 11 A. The police never consulted with INAGROSA. They
12 just would -- in August they would notify Luis Gutiérrez
13 that they were expelling the people out, or in July when
14 the information that I have is that -- from Domingo

12:10:19 15 Ferrufino -- is when I believe Toño Loco, one of the --
16 the head of the paramilitaries in Jinotega, I think it
17 was July -- sometime in July -- that Domingo Ferrufino
18 saw that armed with his AK-47, he lined up his people
19 and told him to tell everybody that is in the farm to
12:10:48 20 get out now.

21 Q. Let me also ask this.

22 In the time that you spoke with Police
23 Chief Herrera on the telephone, and later in response to
24 the letter you sent to him, did he ever ask you to make
12:11:05 25 out a police report?

12:11:07 1 MR. MOLINA: I'm sorry to object, but
2 there's been a series of questions. I've let it slip,
3 but every one of these questions is leading.

4 PRESIDENT: They are not exactly
12:11:18 5 cross-examination questions, but they are yes or no
6 questions, so it's not particularly helpful for the
7 Tribunal. So you may want to rephrase them as open
8 questions if the goal is to assist the Tribunal.

9 Q. You spoke with Mr. Herrera, I believe it was in
12:11:36 10 June?

11 A. June 17, 2018.

12 Q. And you recall that conversation?

13 A. Yes, I do.

14 Q. Did the subject of INAGROSA making a police
12:11:46 15 report come up in the conversation?

16 A. It did not.

17 Q. Now, you were asked a number of questions about
18 the use of the term "invaders". Do you remember that?

19 A. Yes.

12:12:10 20 Q. And you distinguished invaders from occupiers
21 from the first time there was an occupation?

22 A. Yes.

23 Q. What do you mean when you distinguish those
24 people using the term "invader" versus "occupier"?

12:12:28 25 A. "Invader" is where you're heavily armed, and

12:12:38 1 you give orders to people, "Step aside" like they did
2 when they came into Santa Fé that 16th of June 2018.
3 They said that they were there on behalf of the
4 government of Nicaragua, that the farm had been given to
12:12:59 5 them, and to step aside essentially.

6 Q. How was it different in the 1990s occupation?

7 A. In the 1990s occupation, it was -- in my
8 opinion, what I saw, poor people were being used to
9 occupy farms to try to force the owners to sell it.

12:13:29 10 There were bigger interests than the poor people that
11 were occupying the farm. That's what I -- the
12 conclusion that I reached at the end of the process.

13 MR. HILL: We can take this down. Can you
14 pull up R-177 and go to Tab 8. And I'll just start
12:14:12 15 introducing it as you pull up the second part.

16 Q. This is a letter that I believe you sent to
17 Mr. Marco Centeno?

18 A. Centeno, yes.

19 Q. And you were asked questions about this?

12:14:26 20 A. Yes.

21 Q. Go to page --

22 MR. HILL: When you get it up. That's
23 okay.

24 MR. MOLINA: Mr. Hill, our monitors are
12:14:40 25 not working. But we can -- I can go off of this for

12:14:46 1 now.

2 MR. APPLETON: Would you like us to stop?

3 MR. HILL: It's fair.

4 PRESIDENT: No, please go on. I think we
12:14:52 5 still have a sufficient number --

6 MR. MOLINA: Sorry, I didn't realize this
7 was on. Thanks.

8 MR. HILL: Turn to page 3, please. On the
9 English side for a second, yes. You can take this down
10 for now.

11 Q. Mr. Rondón, you were asked questions about an
12 OPIC loan that you intended to utilize for a project.

13 A. Yes, I was.

14 Q. Could you explain the project?

12:16:00 15 A. The project was to grow leatherleaf ferns at
16 Hacienda Santa Fé and cut them, process them, package
17 them for the European market. And we were on the brink
18 of starting the investment, ordering the ceramic cover.
19 It's a cover that allows a certain percentage of
12:16:34 20 sunlight to go through.

21 When our would-be partner in the project
22 was having difficulties and he said to us that, you
23 know, can you do it alone? And I told him, well, I
24 don't believe so, because he's the one that had the
12:17:02 25 experience based in Costa Rica. And so I went to

12:17:06 1 Costa Rica to see his farm, and he had everything for
2 sale.

3 Then I spoke to my father-in-law. He was
4 in Kansas, and I told him -- my wife and daughter came
12:17:19 5 with me on that trip to Costa Rica -- and I told him
6 that I did not feel comfortable doing it just our own
7 group, and he said: "Well, don't do anything that the
8 cows can eat and people can't eat." That was a very
9 practical answer because leatherleaf ferns is used in
10 the ornamental industry.

11 So I told myself, well, when I get back to
12 the United States, I'm going to call OPIC and tell them
13 that we're not proceeding with it. So they asked me to
14 put it in the letter that we were withdrawing from the
12:17:56 15 project, and we did.

16 MR. HILL: Thank you.

17 Q. So you never actually took out the OPIC loan.
18 Is that correct?

19 A. That is correct.

12:18:16 20 Q. But it was available to you?

21 A. It was available.

22 Q. You were shown a letter --

23 MR. HILL: Let's pull up R-64, please.

24 Q. Okay. Now, first question is you were not
12:18:57 25 copied on this letter, correct?

12:19:00 1 A. That is correct.

2 Q. When did you first see this letter?

3 A. I saw this letter with the bundle of letters
4 that was sent in R-177.

12:19:17 5 Q. Yes. Was this letter -- when you saw it, does
6 this letter indicate to you anything about a possible
7 ongoing controversy between INAGROSA and settlers or
8 invaders or anyone else?

9 A. You know, I look at the letter -- I look at the
12:19:38 10 heading of the letter, companero, tovarishch, comrade,
11 director general of the PGR Jinotega, your office. Dear
12 Tovarishch. It's a self-serving letter. When was it
13 written, I don't know. Who are the people? I don't
14 know them.

12:20:04 15 To us, that is a dead issue since
16 2003/2004. It's like what the letter is saying like
17 trying to force or pressure, or whatever, the
18 procuraduría general to issue titles. The titles are
19 issued by the owner when they sell and sign the deed.

12:20:34 20 So it's a very -- I don't know what to say.

21 Q. To be clear, was there ever a deed or title
22 issued to the occupants?

23 A. Never.

24 Q. And, by the way, there's some notations on the
12:20:57 25 Spanish. Are those your --

12:21:01 1 A. No, they are not mine.

2 Q. I call your attention to the second paragraph,
3 which describes the eviction as "brutal". What was the
4 involvement of INAGROSA in the actual eviction?

12:21:31 5 A. The police carried out the eviction, notifying
6 the people that were being evicted. INAGROSA helped in
7 dismantling their, I would say, huts and belongings and
8 putting them in the trucks that INAGROSA paid for for
9 the transportation to their new location in San

12:21:56 10 Miguelito, Leon, Nicaragua.

11 Q. It also says it was carried out -- the eviction
12 was carried out in 2004 by order of Ana Lorena Rondón
13 Molina. Is that correct?

14 A. That is my sister. Of course not.

12:22:29 15 Q. And it says "whose brother at the time served
16 as a minister of the government." Is that true?

17 A. I have never been involved in Nicaraguan
18 politics, and I don't know why they do it. It's a bad
19 intention to smear our family or what.

12:22:51 20 Q. Do you have a brother?

21 A. I have two brothers, and they do not live in
22 Nicaragua.

23 Q. So not ministers of the government?

24 A. No.

12:23:01 25 Q. So Ana Lorena Rondón Molina does not have a

12:23:05 1 brother who is a minister?

2 A. No.

3 Q. It also says in that paragraph that the
4 eviction was illegal. Can you describe the mechanism of
12:23:16 5 the eviction?

6 A. The mechanism is that it went through the court
7 process in Nicaragua, it went through the appeal court.
8 And after the appeal court confirmed the eviction, it
9 was handed down by the judge to the police to carry out
12:23:39 10 the eviction.

11 Q. It also says Ms. Rondón was compensated by the
12 government. Is that accurate?

13 A. It's a figment of the imagination of those
14 people. No, it's not.

12:24:00 15 Q. So all of these statements that we've gone over
16 in this letter are, indeed, false. Is that right?

17 A. That is correct.

18 PRESIDENT: That is cross-examination.
19 These are leading questions, Mr. Hill. It's not very
12:24:14 20 helpful for us. You are spoon-feeding the witness with
21 the answers, so it doesn't really help us.

22 MR. HILL: Understood. You can take this
23 one down.

24 Could you pull up R-177. And then --
12:25:09 25 yeah -- and then we're going to go to Tab 14, please.

12:25:25 1 On the English, it's page 17 out of 77. Two pages are
2 off so you'll need to get to Tab 14. Yes, that's the
3 right one on the English. Let's start with the English,
4 and we'll get the Spanish up.

12:26:22 5 Q. Mr. Rondón you were asked questions, and you
6 referred in your answers to a report done by a
7 Mr. Francisco Rivera?

8 A. Yes.

9 Q. Is this that document?

12:26:36 10 A. Yes.

11 Q. Who is Mr. Rivera?

12 A. Francisco Rivera, I got acquainted with him
13 after this process and he came to work for us -- I think
14 it was either 2004 or 2005.

12:27:02 15 Q. In 2001, did he work for you?

16 A. No.

17 Q. Had you known him before that?

18 A. I knew of him. Had I met him? I don't know.
19 He had been a member of the army of Nicaragua up until
12:27:21 20 1979.

21 Q. What was his title?

22 A. For us or for here?

23 Q. For here.

24 A. For here. It says Presidential Delegate for
12:27:35 25 Agrarian Affairs of the Nicaraguan Resistance.

12:27:44 1 Q. You were asked questions about the buildings,
2 things that were done by the occupants of Hacienda
3 Santa Fé, correct?

4 A. Yes.

12:27:56 5 Q. And how does this document inform that issue?

6 A. Well, you know, it says that there are huts
7 there, not very many people, and they saw a fellow
8 listed by name there, if you can make it bigger and down
9 please. There it says -- right here in the offices of
10 the OTR in Jinotega were sighted some of the members in
11 care of such huts. Only two persons of those people
12 were real beneficiaries to be given land in other place.

12:28:27 13 Q. What is land trafficking?

14 A. Land trafficking means you're selling land that
15 doesn't belong to you.

16 Q. And you were asked questions about land
17 trafficking on cross-examination. What does this
18 letter, if anything, inform about land trafficking?

19 A. It gave me right off the bat -- we had
12:29:17 20 information, but with this statement from Mr. Rivera on
21 this fellow that was a saddle maker whose address was
22 the market of the city of Jinotega, last name Gutiérrez,
23 it said that he was buying land. He was there to buy
24 land.

12:29:40 25 Q. And what does that mean with regard to land

12:29:42 1 trafficking?

2 A. Nobody could sell him land because nobody could
3 transfer a title in the sale.

4 MR. HILL: We can take that down.

12:29:57 5 Q. You were asked a question about the number --
6 I'm going to skip forward now for a moment to the 2018
7 invasion. You were asked a question about why you only
8 had five security guards in total for Hacienda Santa Fé.
9 Do you remember?

12:30:17 10 A. Yes.

11 Q. And why did you have five security guards?

12 A. Because that was enough to keep, A, the safety
13 inside the farm and to inspect, you know -- patrolling
14 inside the farm. You know, we had four-wheelers, we had
12:30:41 15 a Rhino, we had a pickup truck in the farm. We had
16 tractors at the farm that they could use whatever they
17 needed for the -- you know, patrolling of the farm. The
18 four-wheelers were very quick and economical and fast.
19 Fast. You could get from point A to point B very fast.

12:31:05 20 Q. What does --

21 A. And --

22 Q. Sorry. Continue your answer.

23 A. And so that's what -- that's why we only needed
24 five of them. In the times of the coffee harvest, big
12:31:18 25 times in coffee, I believe we had up to 12 guards when

12:31:27 1 we had 1500 people working, you know, picking the coffee
2 for about three months.

3 Q. When you said you had a Rhino, what is a Rhino?

4 A. A Rhino is a -- what's called all -- a utility
12:31:47 5 vehicle, 4x4 for trails and farms. You can carry, you
6 know, a hundred, a thousand pounds in the little bed in
7 the back and it carries comfortably two people and
8 they're comfortable to ride. And you move quick.

9 MR. HILL: Mr. President, I see that it's
12:32:11 10 just past 12:30. This is a convenient time for us, if
11 you would like to take the break now.

12 PRESIDENT: Yes, indeed. Thank you very
13 much. We break until 1:30. And Mr. Rondón.

14 MR. RONDON: Sequestered.

12:32:26 15 PRESIDENT: You are still sequestered, so
16 please don't speak with anybody at your testimony.

17 MR. RONDON: Yes, sir.

18 PRESIDENT: But you can of course have
19 lunch. Thank you very much.

12:32:36 20 *(Lunch Recess)*

21 PRESIDENT: Let's resume. By way of
22 housekeeping, we have received an application from the
23 Respondent to strike the testimony of Mr. Ferrufino.
24 The next step will be to invite the Claimant to comment
01:31:33 25 on that application. We understand we are in the middle

01:31:43 1 of an ongoing hearing. What is the deadline you're
2 proposing? After the weekend?

3 MR. APPLETON: Mr. President, first of
4 all, we haven't had an opportunity to even go through
01:31:53 5 all the materials. It came in the middle of lunch. We
6 could have been advised this morning when we had
7 housekeeping. Certainly they didn't decide on this in
8 the last few minutes, something with so many pieces, so
9 many elements to it.

01:32:07 10 So, first of all, I can't even comment
11 until I can read and then fully evaluate. It came out
12 in the last few minutes. But we will get back to you
13 with a proposed time and perhaps with a couple of
14 proposed approaches but, at a minimum, I need to be able
01:32:24 15 to have until the end of -- after today. I have to be
16 able to finish what we're doing now and read through it.
17 We have two witnesses today, and then we can get back.
18 And to be very honest, I actually need the opportunity,
19 amongst other things, logistically to speak at some
01:32:43 20 point with Mr. Rondón who I can't discuss anything with.

21 PRESIDENT: Understood.

22 MR. APPLETON: So I have a variety of
23 constraints that we need to work through before we're in
24 a position to be able to deal with anything.

01:32:56 25 PRESIDENT: Understood. The only issue

01:32:58 1 I'm raising is the deadline for the response, not the
2 substance of the -- not a substantive discussion about
3 the application.

4 So can we expect that you would be able to
01:33:08 5 come back to us in the course of today after the hearing
6 maybe in terms of your proposed deadline?

7 MR. APPLETON: No. That's exactly what
8 I'm telling you. I cannot do that at this time. I will
9 require the opportunity to be able to review what came
01:33:24 10 in. That is exactly my difficulty. Had it come at the
11 beginning of the day or had it come earlier, I might
12 have had that opportunity. But there's just so much of
13 us to go around and so many pieces that came in here.

14 This is what I would call a multiple
01:33:42 15 warhead type of omnibus approach with a variety of
16 issues that requires careful consideration. That's our
17 difficulty. That is why it is so deeply prejudicial,
18 and we'll get an opportunity to speak to that in due
19 course. But I need that opportunity -- so that's why I
01:34:04 20 can't give you -- normally I would love to be able to
21 deal with it. I must have the opportunity for fairness
22 and the opportunity to consider my position to be heard.

23 PRESIDENT: Let's revert to this tomorrow
24 morning, then, as part of housekeeping, and we'll see
01:34:15 25 where we are.

01:34:16 1 MR. APPLETON: I would hope to be in a
2 position by tomorrow morning to either have a position
3 or to tell you where I would be in getting to a
4 position.

01:34:24 5 PRESIDENT: Okay.

6 MR. APPLETON: But at this point I just
7 can't.

8 PRESIDENT: That's fine. Let's discuss it
9 tomorrow morning then.

01:34:30 10 And we now continue with the examination
11 of Mr. Rondón. Mr. Hill.

12 MR. HILL: Thank you, Mr. President.

13 BY MR. HILL:

14 Q. Mr. Rondón, we spoke briefly before the break
01:34:44 15 about the security guards.

16 What incidents had you had in the past
17 that required the efforts of your security guards?

18 A. At Santa Fé -- can you refer to years?

19 Q. Sure. Say the last ten years?

01:35:07 20 A. Not that I remember any.

21 Q. How about the last 15 -- well, how about the
22 period between 2004 and 2018, prior to June 16?

23 A. There weren't any incidents in Santa Fé.

24 Q. Had there ever been an armed invasion prior to
01:35:34 25 June 16, 2018?

01:35:40 1 A. There had not.
2 Q. Were you expecting one --
3 A. Yes.
4 Q. Sorry, were you expecting one in June 2018?
01:35:49 5 A. No, I was not.
6 Q. Were your security guards expecting one?
7 A. No, they were not.
8 Q. I'd like to go back now to the newspaper
9 article. It's R-36. Start with page 1, please. I'll
01:36:36 10 come back to it.
11 (Technical discussion)
12 MR. APPLETON: Okay. We can go back on
13 the record. Thank you to Marcellus and the technical
14 team.
01:38:30 15 PRESIDENT: Very good. Please go on,
16 Mr. Hill.
17 Q. Mr. Rondón, I'm showing you R-0036. This is
18 the newspaper article that you were questioned about?
19 A. Yes.
01:38:43 20 Q. And if you could go to page 2 where the photos
21 are. Let's go one at a time on the photos.
22 First, Mr. Rondón, on the first photo, do
23 you recognize that gentleman?
24 A. No, I don't know him.
01:39:02 25 Q. And how about the building that he's standing

01:39:05 1 in front of?

2 A. No.

3 Q. Do you know where the location of that photo
4 was taken?

01:39:16 5 A. It's supposed to be in Santa Fé.

6 Q. But I'm asking you whether you recognize it?

7 A. I don't.

8 MR. HILL: Next photo, please. Can you
9 make it, I guess, a little smaller because I want to see
01:39:31 10 the caption, please.

11 Q. Do you recognize the location of that photo?

12 And I'm talking about your own --

13 A. The middle picture?

14 Q. Yes.

01:39:47 15 A. Yes, I do.

16 Q. It says it was a chain or a gate across a
17 public road. Is that accurate?

18 A. There aren't public roads in Santa Fé. The
19 roads that there are, we built, and we have given access
01:40:10 20 because of the numbers of people that work there that
21 took the local transportation. Instead of being dropped
22 off at about over a kilometer from the headquarters, we
23 would let them come to the headquarters, and they will
24 get off the bus right there.

01:40:35 25 And then later, another route started

01:40:37 1 coming, and we would let them go through. But the
2 roads, we built in Santa Fé.

3 Q. Did INAGROSA -- well, when was this gate put
4 up?

01:40:53 5 A. That gate was always there.

6 Q. When you say always, from the time of INAGROSA
7 or --

8 A. 1990. When we got to the farm, it was there.

9 Q. Thank you.

01:41:06 10 Next photo, you had started to talk about
11 this one, and Mr. Molina had you move on. So what was
12 it about this photo that you wanted to bring to the
13 attention of the panel?

14 A. That and the picture of the house is like where
01:41:21 15 did they get the wood to build, the wood to put those
16 posts? It all came from the farm.

17 Q. Meaning they --

18 A. Meaning that they illegally cut trees to, you
19 know, post them there and build their place. It's very
01:41:50 20 difficult to find wood like that in the market in
21 Jinotega. In San Rafael del Norte, there is none.

22 Q. Do you know if they got permits?

23 A. I don't have any idea, but I believe -- I don't
24 believe they would.

01:42:04 25 Q. That's enough for that one. You were asked

01:42:14 1 some questions about the presence of field workers at
2 Hacienda Santa Fé between -- I believe it was between
3 the first and second invasions in 2018. Do you recall
4 that?

01:42:27 5 A. Yes.

6 Q. When was the last time you were in Hacienda
7 Santa Fé?

8 A. May -- I think it's 10th, 11th, 2018.

9 MR. HILL: Let's pull up the witness
01:43:18 10 statement -- I believe it's the first. Give me one
11 moment, let me make sure it's the right one. Pull up
12 witness statement No.1 for Mr. Rondón -- that's
13 CWS-01 -- and please turn to page 24. Yes. And then
14 we'll zoom in to paragraph 92, please. Thank you. Yes,
01:44:22 15 perfect.

16 Q. Mr. Rondón, you were asked a question and were
17 beginning to describe a note, and then the testimony
18 moved on. Could you explain to the Tribunal the
19 significance of what you're saying here in paragraph 91?

01:44:44 20 A. It states that -- essentially it's a death
21 threat against workers at Santa Fé. Jaime Vivas, our
22 grafter, is the one that found it. And it says, "we
23 will return and are going to kill you for being a
24 snitch."

01:45:11 25 And after -- this was the visit that was

01:45:13 1 conducted by the attorney Rivera Monzón, and after that,
2 he quickened his inspection and stay at the farm and for
3 that reason that he got to the upper part of the farm to
4 take an inventory of the looted, stolen and destroyed
01:45:38 5 property.

6 Q. Let's back up to paragraph 90, please, just to
7 set the context.

8 You were just describing that this
9 occurred when?

01:45:49 10 A. This was on the visit by Mr. Carlos Monzón, the
11 attorney, Captain William Herrera, our agronomist, Luis
12 Gutiérrez, and I believe there were four or five
13 policemen accompanying them.

14 Q. So let's identify the people. You said Carlos
01:46:18 15 Alberto Monzón. That was your attorney?

16 A. Yes.

17 Q. And Herrera?

18 A. Herrera is the police captain.

19 Q. And the gentleman you had spoken with?

01:46:31 20 A. Yes.

21 Q. Who is Jaime Vivas?

22 A. Jaime Vivas works -- worked for us. He was the
23 grafter of the nursery in Santa Fé.

24 Q. How about Ferrufino?

01:46:47 25 A. Security guard.

01:46:48 1 Q. And Mr. Palacios?

2 A. Security guard.

3 Q. Slide down now to 91 again. Who is -- 92.

4 Who is Luis Antonio Rizo, Toño Loco?

01:47:16 5 A. In life, he was a paramilitary of the forces

6 that took and confiscated Santa Fé. He was from

7 Abisinia, Jinotega and he was heavily armed and he was

8 the paramilitary in charge of cleaning up the City of

9 Jinotega -- all the demonstrators and protesters

01:47:51 10 there -- and he led the squads that killed people.

11 MS. GONZÁLEZ: What did you mean by clean
12 up?

13 A. The Sandinista call it "clean up". When they

14 put down the barricades that were in the city and

01:48:11 15 started shooting the people that were there.

16 Q. Now, I -- it also indicates here -- or you said
17 here in your testimony that the report was that it was
18 Toño Loco's son making the comment. Do you know his
19 name?

01:48:35 20 A. Yes. I don't know him. I don't know his name.

21 Q. You don't know his name, okay?

22 A. You can ask Luis because he knows him. He met
23 him. This incident, I think Luis was present.

24 Q. Going back to the note for a moment, did

01:48:56 25 Jaime Vivas speak to you about the note?

01:48:58 1 A. Yes, he did.

2 Q. What did he say?

3 A. He said that it was pretty scary. He had
4 already been assaulted and beaten up by the
01:49:11 5 paramilitaries, and after that, he told me he didn't
6 feel safe being there and he fled. He just left for his
7 life.

8 MR. HILL: Could you go to paragraph 108,
9 please?

01:49:55 10 Q. Who is Cristobal Luque?

11 A. According to this, he's a voluntary police
12 officer or police officer. I don't know him. I never
13 met him.

14 Q. Well, and now let's talk about Mr. Ferrufino.

01:50:19 15 What happened to Mr. Ferrufino?

16 A. He was assaulted and beaten up. His -- it was
17 so severe, the beating, that he's got medical issues
18 deriving from it. He is a man of close to 70 years of
19 age, and he was a regular in the Sandinista Army during
01:50:57 20 the '80s and he had fought on notice of the Sandinista
21 Army in El Salvador, trained by the North Koreans and
22 Cubans. And he was severely wounded during the war in
23 Nicaragua. And he's got one of his legs -- the right
24 leg, I believe -- he's kind of crippled on that leg.

01:51:33 25 And he was our security guard. And he told me, you

01:51:38 1 know, he suffers the consequences of that beating until
2 this day.

3 Q. And what effect, if any, does that have on you?

4 A. Pain. Articulating what he feels. He gets
01:51:58 5 tired very quickly, can't walk like before, doesn't have
6 the capacity to work. His neck hurts.

7 Q. I was referring more, if I can just clarify, to
8 the effect that knowing of that incident, what, if any,
9 effect has that had on you personally?

01:52:26 10 A. You know, when you concentrate a physical
11 assault on an older man, that tells me the brutishness
12 and criminality -- criminal intent of those people that
13 had taken over our farm. By concentrating on somebody
14 like Domingo, who in the past had been one of them, but
01:52:58 15 because he had worked at our farm, it's like there
16 aren't any limits for those people. No limits.

17 PRESIDENT: Mr. Hill, does this arise from
18 the cross-examination? Or do these questions arise from
19 cross-examination?

01:53:18 20 MR. HILL: I believe all the questions
21 concerning the invasion arise. He was asked a number of
22 questions about the invasion.

23 PRESIDENT: Well, I mean, that is a very
24 broad term. It covers everything that he's testifying
01:53:32 25 about.

01:53:33 1 MR. HILL: Sure, directly, I don't
2 think --

3 PRESIDENT: The question is whether there
4 were any specific questions about Mr. Ferrufino. I
01:53:39 5 don't think there were.

6 MR. HILL: Well, I mean, there were lots
7 of questions about death threats and, you know, the
8 treatment of the security guards and why security guards
9 left, why they didn't secure the property. It's
01:53:58 10 directly relevant to why, on August 11th or 14th, or
11 whenever it was that they had the inspection, Nicaragua
12 has argued that they didn't take back the property. So
13 this is a direct explanation of why that may not have
14 occurred. Among other reasons, one of the security
01:54:15 15 guards had already been severely beaten by the invaders.

16 PRESIDENT: In any event, keep it on a
17 narrow path. The purpose of redirect examination is not
18 to investigate issues that were not directly addressed
19 on cross-examination.

01:54:36 20 Please go on, but I leave it for the
21 Respondent to object if they get specifically concerned
22 about any particular point of your redirect examination.
23 But the idea is not to rehash the evidence that has
24 already been discussed.

01:54:59 25 MR. HILL: Okay. Paragraph 81, please.

01:55:14 1 Q. Regarding the issue of whether Hacienda
2 Santa Fé was able to continue operating after the
3 invasion, did you get a report about a gentleman known
4 as Comandante Gorgojo?

01:55:32 5 A. Yes, I did.

6 Q. And who is he?

7 A. He was a resistance member who fought the
8 Sandinistas during the 1980s and known to be a very
9 violent man.

01:55:53 10 Q. And could you relate what Luis Gutiérrez told
11 you regarding Gorgojo?

12 A. Yes, that he said we were dead men. That's a
13 death threat.

14 Q. And what did you do at that point regarding
01:56:14 15 that death threat?

16 A. I told Luis to be very, very careful with those
17 people and -- and to be more specific, you could ask him
18 the questions because --

19 Q. Perfect.

01:56:32 20 A. -- he was there.

21 Q. We'll do that.

22 You were asked questions about your
23 knowledge of whether the invaders actually left in
24 August. Do you remember?

01:56:55 25 A. Yes.

01:56:57 1 Q. Do you know if they left?

2 A. According to Wama and the letter that he
3 signed, he states that he never left the farm. So the
4 farm is -- it's got a good size. So why would I believe
01:57:15 5 somebody that is at the headquarters saying that they're
6 all gone? There are ample places towards the east from
7 the main headquarters where they could stay, that have
8 the facilities for people to live in. So did they leave
9 or not? I don't know.

01:57:47 10 Q. During the inspection in -- I believe on
11 August 14, 2018, what areas of the farm were inspected?

12 A. Just the lower headquarters part of the farm.

13 Q. You were asked a question about whether you
14 asked the police to set up a 24-hour perimeter. Why did
01:58:10 15 you not do that?

16 A. Perimeter of what? The headquarters? The
17 eastern part of the farm or the whole farm?

18 Q. Well, how big is the farm?

19 A. 1,896.7 manzanas. If you divide that by 1.41,
01:58:37 20 you get the number of hectares.

21 Q. So do you know how many security guards it
22 would take to set up a -- what was the word? A
23 perimeter around the entire Hacienda?

24 A. It's like an army. You know the rule of
01:58:52 25 thumb, one soldier every 50 meters, you know. It's a

01:58:57

1 lot.

2 Q. You were also asked whether you hired more
3 security guards. Why did you not?

4 A. It was enough for us to safeguard Hacienda

01:59:09

5 Santa Fé from just regular locals on any possible crime
6 that they could commit. We were never expecting an
7 invasion in the hundreds of people ordered by the
8 government.

01:59:28

9 Q. The question that I'm asking you about from
10 Mr. Molina was in regards to the time after the invasion
11 and after, according to the government, the invaders had
12 left. So he asked you in that context why did you not
13 hire more security guards?

02:00:01

14 A. First of all, the farm had been looted.
15 Anything that was of value had been taken. The guards
16 had their weapons confiscated, and people were afraid
17 because of what was going on at the farm. They were
18 afraid for their lives.

02:00:21

19 Q. You also, in answer to a question --

20 PRESIDENT: Mr. Hill, let's have a brief
21 break of two minutes. I'll be back.

22 MR. HILL: Okay.

23 *(Pause)*

24 PRESIDENT: Okay. Let's go on.

02:02:45

25 MR. HILL: Thank you, Mr. President.

02:02:49 1 Q. Mr. Rondón, you also answered a question
2 incompletely regarding the State of Nicaragua and that
3 Nicaragua is not a normal country. Could you explain
4 that to the Tribunal?

02:03:08 5 A. Fundamentally, Nicaragua is no longer a normal
6 country. It's a dynastic dictatorship.

7 MR. MOLINA: Mr. President. I'm sorry to
8 interrupt. I never asked Mr. Rondón his opinions about
9 Nicaragua as a country or its politics. I asked
02:03:28 10 questions specific to the events that are at issue here.

11 MR. HILL: My recollection is that it was
12 either this question or a similar one where Mr. Molina
13 objected to the answer that was coming forth and said
14 specifically your attorney will have the opportunity to
02:03:43 15 ask you that on redirect.

16 PRESIDENT: That's right. But if -- the
17 question was not about Nicaragua as a country. The
18 answer was about Nicaragua as a country, and the answer
19 went beyond the question. It was not responsive to the
02:03:58 20 question. So I think you should move to another
21 subject.

22 MR. HILL: Sure. We'll check the
23 transcript on that, and we'll get back to it.

24 PRESIDENT: Check the transcript, but
02:04:11 25 that's my recollection. If you can show that it's not

02:04:13 1 correct, we can come back to it.

2 MR. HILL: Can we do the search on the
3 real time?

4 MR. APPLETON: Mr. President, the
02:04:26 5 practical difficulty is that we don't have a transcript
6 that's available right now. So if you want us to take a
7 break before we finish, which is fine, and then be able
8 to have the assistance of the court reporter, we'd be
9 delighted to do that. But our problem is that if you
02:04:38 10 would like us to do that and we're prepared to do that,
11 we're going to need to have access to be able to see
12 that.

13 PRESIDENT: Well, we do have the live
14 transcript and you can scroll and if you are preparing a
02:04:51 15 redirect examination, you need to keep track of the
16 questions and the answers that you want to put a
17 redirect question on. We can have a brief break at some
18 point so that you can scroll and look for the relevant
19 point. But there was no question about Nicaragua as a
02:05:09 20 country -- a broad question of Nicaragua as a country.
21 So that is what we're talking about.

22 MR. APPLETON: Mr. President, we will
23 take -- whenever that break is, we will go back to the
24 specific invitations made by Mr. Molina. There are
02:05:25 25 either two or three. And then we will put them directly

02:05:28 1 back in exactly that way and we will reference it
2 exactly to the rough transcript and --

3 PRESIDENT: It doesn't matter what
4 Mr. Molina invited you to discuss. The question is what
02:05:38 5 kind of questions he was putting to the witness. The
6 redirect questions must arise out of the questions put
7 by the Respondent, not from the Respondent's
8 invitations. It doesn't open the door for any kind of
9 questions. So let's come back to this in a moment. In
02:05:58 10 the meantime --

11 MR. APPLETON: Mr. President, we may
12 actually have part of this on the transcript available
13 now.

14 PRESIDENT: You do?

02:06:05 15 MR. APPLETON: We may be able to, or at
16 least for part of it. So perhaps that will be addressed
17 immediately and then we can go from there. Again, we'll
18 see it from the transcript -- we have an exceptionally
19 able transcription team, both in English and Spanish --
02:06:20 20 so we thank them very much for what they're doing.
21 Thank you. We will do everything we can to keep it
22 within the four corners exactly as you would like.

23 PRESIDENT: Do you want to quote the
24 transcript now?

02:06:30 25 MR. HILL: Yes, I'd like to.

02:06:32 1 PRESIDENT: Let's do it now then. And the
2 Respondent -- if you give the reference, the Respondent
3 can follow the explanation. Please go ahead.

02:06:49 4 MR. HILL: Thank you, Mr. President. So
5 beginning at 10:02:04. That's 10:02 in the morning past
6 4 seconds.

7 Question: You testified in your first
8 witness statement, paragraph 227, that you were informed
9 by someone that as of August 2021 -- sorry, summer of
02:07:10 10 2021 -- that the police had removed all the occupants of
11 your Hacienda, yes?

12 Answer: Mr. Luis Gutiérrez informed me
13 that the National Police started to remove invaders at
14 Hacienda Santa Fé, yes.

02:07:35 15 So question, I'm sorry, at 10:01:29. I
16 went in the wrong direction: Did you do anything to
17 fortify the security team at Hacienda Santa Fé during
18 that period of time? Yes or no?

19 Answer: There were no facilities for them
02:07:49 20 to go to. What were they going to do, get killed? So
21 the answer is no?

22 Answer: Of course not. I like the lives
23 of my workers.

24 Question -- and this is the one that has
02:08:02 25 the direct answer:

02:08:04 1 Did you reach out to your investor,
2 Riverside Coffee, and say we're going to need more money
3 because we need to secure our Hacienda, yes or no?

4 Answer: I don't remember what I reached
02:08:15 5 out to Riverside Coffee, LLC for. I don't remember. I
6 have no recollection. But Nicaragua was not
7 fundamentally a normal country.

8 So he was explaining, in response to a
9 series of questions about why -- and critical
02:08:33 10 questions -- of why INAGROSA itself did not hire more
11 security detail, and he was explaining that and finally,
12 whether he had reached out to the investor for more
13 money and he was explaining that --

14 Well, I was going to ask him to explain
02:08:49 15 now that response because it included his reasons for
16 not doing more to secure the property. And that's a
17 fundamental point in Nicaragua's defense here is that
18 the investor or its company, INAGROSA, should have done
19 more to secure its own property, that they shouldn't
02:09:15 20 have relied on the government to do it; they should have
21 done it themselves.

22 So now this question is why didn't you do
23 that, and he started to answer by explaining the
24 circumstances in Nicaragua at the time, which again is a
02:09:26 25 fundamental point in this case; why didn't you do more

02:09:28 1 security? Well, understand the circumstances in the
2 country. That's what he should be able to explain here.

3 PRESIDENT: Can you refer again to the --
4 apologies. Can you refer to the precise point of the
02:09:42 5 transcript again?

6 MR. HILL: Yes.

7 PRESIDENT: For our benefit?

8 MR. HILL: Sure.

9 The exact question was posed at 10:01:45,
02:10:01 10 and I had also -- the response was at 10:01:53. I had
11 also referenced for context a couple of the questions
12 before that on the same subject.

13 MR. MOLINA: If I may, Mr. President,
14 whenever you're --

02:10:21 15 PRESIDENT: Yes.

16 MR. MOLINA: As the transcript, at least
17 the portion of the transcript Mr. Hill has referenced
18 clearly shows, I asked a question, a very specific
19 question, about whether he had a communication with his
02:10:31 20 investor. I didn't ask about his opinions about
21 Nicaraguan politics or the State of Nicaragua. It was
22 as narrowly confined of a question. The fact that
23 Mr. Rondón started increasing the scope of that subject
24 matter is not the relevant point here. The relevant
02:10:52 25 point is my question was limited to what communications

02:10:56 1 he had with his investor.

2 PRESIDENT: And, Mr. Hill, I believe you
3 said that you want to put a follow-up question on
4 redirect because Mr. Molina didn't allow the witness to
02:11:09 5 answer that question. Where is that in the transcript?

6 MR. HILL: My mistake, Your Honor -- I
7 mean, Mr. President, my mistake.

8 PRESIDENT: But he has answered the
9 question.

02:11:26 10 MR. HILL: Okay. We won't go any further
11 on this.

12 PRESIDENT: Let's move on.

13 MR. HILL: One moment.

14 Q. Mr. Rondón, you were asked some questions about
02:12:22 15 the logging at the property by the invaders. Do you
16 remember that?

17 A. Yes.

18 Q. Could you describe your understanding of how
19 long it would take, what the state of the logging that
02:12:36 20 occurred and, based on your knowledge of the forest,
21 perhaps how long that would have taken?

22 A. To decimate the forests in Santa Fé would take,
23 at the least, two years of cutting down the adult
24 hardwoods that were there. And the information that I
02:13:14 25 kept getting is that there were at least ten teams of

02:13:21 1 wood loggers with chainsaws working at the farm.
2 Because they could -- the people that would tell me,
3 former workers, they could hear in the different
4 sections of the farm the chainsaws going at it and that
02:13:37 5 the logs were removed at night in heavy trucks out of
6 the farm.

7 I don't know if they had permits from
8 MARENA or whom to deforest Santa Fé.

9 Q. Are you able to give a precise description of
02:13:57 10 the time it took to deforest?

11 A. It's too bad that we don't have the pictures
12 from the satellites. I could get some very accurate
13 pictures of the time.

14 Q. How big was the forest?

02:14:15 15 A. The forest -- what I call the primary forest
16 was virgin forest, over 140 hectares. That was the
17 source for our hydrology at the farm. And that one, you
18 see it now in the film that the defendant presented, you
19 can see it all open. Primary forest means nobody's ever
02:14:52 20 been in it before. Not cutting, nothing. Secondary
21 forest, you can see it. It's almost all gone. And the
22 tertiary forest, there is nothing. Just dirt. In that
23 film it indicates it.

24 MR. HILL: Could you pull up C-55? That's
02:15:12 25 the management representation letter.

02:15:25 1 A. C-85?

2 Q. No, no, you don't have -- it will come up on
3 the screen in a moment. And it will be -- there we go.

02:15:55 4 Paragraph 23(1) please. No, hold on a
5 second. Just one moment.

6 MS. GONZÁLEZ: Mr. President, in the
7 meantime, one of our iPads is not working here. Maybe
8 someone can come to fix it.

9 PRESIDENT: Apologies, I didn't hear that.

02:16:58 10 MS. GONZÁLEZ: One of our iPads is not
11 working, and I would like to request some assistance,
12 please. Thank you.

13 Thank you, Mr. President.

14 PRESIDENT: Okay. We will go on.

02:18:13 15 MR. HILL: Thank you, Mr. President.

16 If we could pull up Carlos Rondón's second
17 witness statement, that's CWS-09.

18 Q. Yes, and you do have this one in front of you,
19 Mr. Rondón. Or it's on the screen, whatever you'd
02:18:29 20 prefer.

21 So this is on page 5, paragraph 23(1). It
22 begins at -- but what I want to call your attention to
23 in particular is the part toward the end. It's on the
24 next page, page 6, where you talk about the illegal
02:18:51 25 logging of the forest, and it didn't start until after

02:18:58 1 the second invasion.

2 Then it makes the statement, "We knew that
3 there was a total deprivation of the foundational
4 elements of our business on August 14, 2018."

02:19:10 5 Please clarify whether you meant, in that
6 second sentence, whether you were indicating that the
7 entire forest was deforested by August 14, 2018?

8 A. The deforestation started in 2018. It went on
9 for at lease two more years. Two and a half to
02:19:40 10 three years. And the reports I kept getting was that
11 the closer to the roads, the larger the trees, those
12 were the first ones to go, the most valuable wood.

13 Then they started farther ahead close to
14 the roads, and they took all the wood. They took all
02:20:15 15 the wood.

16 Myself, I had never cut one single tree in
17 Hacienda Santa Fé, not even to build the furniture at
18 our place. And we had a right by law in Nicaragua to
19 cut down or extract 10 cubic meters of our own wood per
02:20:41 20 year. When we -- we had a bulldozer at the farm on a
21 permanent basis owned by INAGROSA. When we would use a
22 bulldozer to go and grab and pull out old trees that had
23 fallen, shape it into logs, get it out, we were never
24 given the permit to be able to take that wood from old
02:21:09 25 growth that had fallen down. Ever.

02:21:15 1 When they confiscated Hacienda Santa Fé,
2 there was quite a bit of old wood there in the main
3 headquarters of the farm, under shade, so not to be
4 exposed to the sun or the rain, and it was all gone. It
02:21:34 5 was all gone. So it's like my thing was not to cut
6 trees down. It was to plant trees.

7 Q. And why is that?

8 A. It's the beauty of the trees, how they talk to
9 each other, how they enhance nature.

02:21:57 10 For crops, we never did employ the
11 pesticides for coffee. We were planning on doing a
12 pattern from coffee onto Hass avocado using biological
13 controls. And the best help that you get is from the
14 forest itself because the forest will keep the insects
02:22:22 15 in check. And insects for fruits or coffee would be
16 your concerns. And so when you have a large forest, the
17 insects prey upon each other, and they keep themselves
18 in a balance.

19 And we use biological means. How? We
02:22:46 20 would buy 10,000 eyedroppers at the market in Managua,
21 fill them up with moonshine booze, mix it up with a
22 little bit of industrial alcohol, hang them up inside
23 the farm amid rows of trees, be it avocado or coffee.
24 The bugs, they smell the booze, they come over, suck a
02:23:14 25 little bit, fall dead.

02:23:15 1 The other one was that we had plastic 24
2 by 24 inches --

3 Q. Mr. Rondón?

4 A. Yes.

02:23:25 5 Q. Thank you for the answer. One follow-up. What
6 was the relationship of the trees to the growing coffee?

7 A. They gave us shade for the coffee.

8 Q. Shade growing coffee?

9 A. Shade for the coffee.

02:23:41 10 Q. You were asked a question about whether you had
11 prior experience in the Hass avocado field.

12 A. That is correct.

13 Q. Please describe your other agricultural
14 experience.

02:23:58 15 A. I first went to Santa Fé the first week of
16 May 1990. I knew nothing about growing coffee. My
17 family, even though, was heavily involved in agriculture
18 in Nicaragua. Cattle for beef and milk. Rice, cotton,
19 sugar cane. Never coffee. My grandfather said to me "I
02:24:28 20 regret not having had a coffee farm." He was a big
21 farmer. It stayed in my mind.

22 Q. Mr. Rondón, just a minute.

23 Could you please describe your
24 agricultural experience prior to your involvement at
02:24:51 25 Hacienda Santa Fé?

02:24:52 1 A. Yes. I grew up in a multi-age family, you know
2 in Managua, Nicaragua. My grandfather was Carlos Molina
3 Ramirez, very well-known in Nicaragua. Brother -- or
4 Rosales Molina's paternal grandmother, Maria Molina
02:25:23 5 Ramirez, an honorable lady.

6 And my previous experience in agriculture
7 was exactly that in Nicaragua. I moved to the United
8 States when I was 15. My parents -- my father was from
9 Peru. They did not have a future in Nicaragua with the
02:25:46 10 Somoza family there. So we moved to the US, and I'm
11 glad we did. It opened my eyes.

12 I met my wife, Melva Jo, in Denver.

13 PRESIDENT: Mr. Rondón, this is all very
14 interesting but the question was about your --

02:26:10 15 A. In the US I have a lot of experience from my
16 inlaws' farms, working there in wheat, cattle and corn.
17 It was a big operation and --

18 Q. Thank you, Mr. Rondón. Now let's go back to
19 the experience at Hacienda Santa Fé and, in particular,
02:26:32 20 I want to ask you about your experience growing coffee
21 prior to INAGROSA'S coffee expansion.

22 A. When I got there to Hacienda Santa Fé, we could
23 only save, of the old coffee that he had, 30 manzanas,
24 and I planted about 4 million coffee plants and Hacienda
02:26:59 25 Santa Fé became the largest coffee farm in one single

02:27:03 1 location in Central America.

2 Q. And what was your experience growing coffee
3 prior to doing it at INAGROSA?

4 A. Zero.

02:27:17 5 Q. What did you do when you decided -- well, first
6 of all, let me ask this: Why did you decide to
7 transition to Hass avocados?

8 A. I transitioned to Hass avocado because of the
9 fungus Roya -- the Roya fungus that afflicted the coffee
02:27:38 10 plantations around the world in 2012 to 2013 by
11 diminishing the production of coffee. And it hit
12 hardest the highest quality coffees grown at the highest
13 elevations, in Guatemala, Nicaragua, Costa Rica, Mexico.
14 It went around the northern hemisphere coffee regions.

02:28:12 15 And why is that? Because --

16 Q. Mr. Rondón --

17 A. Yes.

18 Q. So you described the Roya fungus, but I think
19 the panel is familiar with that. Why did you decide
02:28:23 20 that Hass avocados would be successful at Santa Fé?

21 A. Hass avocado, the 39 percent that Hass avocado
22 shares with our mica avocado in the Mesoamerican
23 Highlands is native to Hacienda Santa Fé. So there was
24 a compatibility with the Hass avocado.

02:28:52 25 Q. What did you do to educate yourself on the

02:28:54 1 industry for Hass avocados?

2 A. I attended conferences, a world Hass avocado
3 conference in Lima, Peru, September of 2015. Another
4 conference in Ciudad Guzmán Mexico in August of 2017 and
02:29:19 5 another conference in Guadalajara, Mexico in 2018. I
6 believe September 2018.

7 Q. Who is -- you mentioned someone,
8 Rodrigo Jiménez. Who is Rodrigo Jiménez?

9 A. Rodrigo Jiménez is the foremost agronomist,
02:29:41 10 Costa Rica, whose specialty is Hass avocado for over
11 40 years.

12 Q. And what was his relationship with INAGROSA?

13 A. We hired him as our consultant in 2013 for Hass
14 avocado.

02:30:06 15 Q. Did INAGROSA grow their Hass avocado trees
16 directly from seeds?

17 A. INAGROSA grew the -- germinated the Hass
18 avocado seeds in our own nurseries, yes.

19 Q. Is there anything else that goes into the
02:30:26 20 process of growing Hass avocados after germinating the
21 seeds?

22 A. Yes. You have to wait until it reaches a
23 certain height, above 50 centimeters, and it's got --
24 the stem has to reach a certain thickness, and then you
02:30:42 25 do a grafting. And then wait until the grafting to take

02:30:52 1 on and cut the leaves. The new growth is going to be
2 all Hass avocado.

3 Q. At the time you were able to get to a
4 productive crop of Hass avocados, were those avocados
02:31:08 5 picked from trees that were planted simply by seeds, or
6 were they following this grafting process that you were
7 speaking about?

8 A. The first crop that we had in 2017 were from
9 Hass avocados that were planted in the field in the year
02:31:30 10 2014, throughout the year.

11 Q. Grafted?

12 A. Grafted.

13 MR. HILL: Could you pull up C-466,
14 please?

02:32:25 15 Q. I'm showing you what's been marked as
16 Exhibit C-466. You were asked some questions about
17 this. You said that there was going to be an inspection
18 from Costa Rica. Could you describe that, please?

19 A. Yes. I was explained what I needed to have at
02:32:52 20 Hacienda Santa Fé before the USDA will send its agent to
21 inspect Hacienda Santa Fé. In essence, we decided to
22 wait to have more Hass avocado planted at the farm
23 and --

24 Q. Mr. Rondón, I'm going to move on to something
02:33:14 25 else.

02:33:15 1 There's a cc on the email of Russ Welty.

2 Do you see that?

3 A. Yes.

4 Q. What was Russ Welty's involvement in the issue
02:33:23 5 regarding the importation of Hass avocados into the US?

6 A. Russ Welty was a contact person with the US
7 government in this regard to follow through for the --
8 until we would obtain the permit to import Hass avocado
9 from Nicaragua into the United States.

02:33:52 10 Q. And who was principally in charge of the
11 process? Was it you or Mr. Welty?

12 A. I would believe it was Mr. Welty.

13 MR. HILL: Could you pull up CWS-11,
14 please? That's Mr. Welty's witness statement.

02:34:38 15 Paragraph 88, please, and 84.

16 MR. MOLINA: I'm sorry again,
17 Mr. President. Again, I've been trying to be lenient.
18 I did not ask any questions from Mr. Welty's witness
19 statement.

02:34:51 20 MR. HILL: Here's the response to that and
21 why Mr. Welty is relevant here.

22 The question was from Mr. Molina: is there
23 anywhere in the record that you describe these contacts
24 with Costa Rica and the potential for an inspection by
02:35:10 25 Costa Rican officials in order to move forward in the

02:35:13 1 permitting process? And Mr. Molina said: There is
2 nowhere in this record, is there, that you can point to?

3 And the witness was not able to answer.
4 But we're pointing out that --

02:35:26 5 PRESIDENT: Okay, go on.

6 Q. Paragraph 83. This is Mr. Welty's witness
7 statement, CWS-11. Could you just read in paragraph 83?
8 Do you need it bigger? Can you read paragraph 83, and
9 is it big enough for you, sir?

02:35:43 10 A. Yes, it is.

11 "We had contacts with the USDA team at the
12 US embassy in Costa Rica. They had agreed to come over
13 to Hacienda Santa Fé for a pre-inspection visit to
14 assist INAGROSA in getting clearance for import. We had
02:35:59 15 discussed having the USDA team over during the 2018
16 harvest, but that harvest never occurred due to the
17 occupation of Hacienda Santa Fé."

18 Q. Thank you.

19 MR. HILL: We can take that down now.

02:36:23 20 Q. Now, you've been asked some questions about the
21 private wildlife reserve. Do you remember that?

22 A. Yes.

23 Q. What was your understanding of the ability to
24 continue in agricultural production if you had obtained
02:36:39 25 a private wildlife reserve?

02:36:45 1 A. We would have modeled our farm like Jaguar
2 Lodge. They are a private reserve and a coffee
3 plantation as well.

4 Q. Did you visit the Jaguar Lodge?

02:36:58 5 A. Once.

6 MR. HILL: Could you pull up the rapid
7 study? That's R-228. Yes, the MARENA rapid study.
8 It's R-228. And we'll just identify it. For time,
9 we'll just do the English translation.

02:37:33 10 Q. Are you familiar with this document?

11 A. Yes, I am.

12 Q. Generally, what was it prepared for?

13 A. It was prepared as a quick study so that the
14 Hacienda Santa Fé could become a private wildlife
02:37:52 15 reserve.

16 Q. To your knowledge, was this provided to the
17 government of Nicaragua?

18 A. It was provided. We didn't pay any money. It
19 was master in sciences Dania Hernández who did all the
02:38:08 20 inspection and brought all the guests to Hacienda
21 Santa Fé. I made a purpose. I never wanted to be there
22 when people would be there because I'm the person
23 running the place and I don't want them to feel bad
24 about --

02:38:21 25 Q. Okay. Mr. Rondón, let's move along. Page 2,

02:38:25 1 please.

2 Mr. Rondón, could you read in paragraph --
3 the second full paragraph, right in the middle of the
4 page --

02:38:46 5 MR. HILL: Can you make it bigger, please?

6 Q. "Due to the fact that private wildlife
7 reserves" -- could you read that portion? Now it's too
8 much. There.

9 A. Yes, right there.

02:38:57 10 "Due to the fact that private wildlife
11 reserves are home to a significant percentage of
12 conservation, restoration, and protection of natural
13 resources areas with their own financial
14 resources..." -- own financial resources, like we did
02:39:12 15 ours -- "it is evident that the owners of these parcels
16 maintain sustainable production models through
17 agroecological agroforestry, silvopastoral and even
18 eco-horticultural systems, as well as ecotourism ..." --

19 Q. That's good for now. So there was a list of
02:39:42 20 production models that could be undertaken within a
21 private wildlife reserve. Which of those were you
22 involved with? Which of those were going on at Hacienda
23 Santa Fé at the time?

24 A. I would say agroecological and agroforestry.

02:40:01 25 Q. Now, talking about the forestry --

02:40:03 1 MR. HILL: You can take that down. No,
2 wait, there are a couple more things. Page 11, please.
3 If you could -- the highlighting is ours.

4 Q. Could you also read paragraph -- section 4.3

02:40:26 5 A. "The parcel focuses on agricultural production
6 spread over 781 manzanas, mainly coffee production
7 destined for the United States. The agricultural area
8 (nurseries and facility) plans to implement 400 manzanas
9 of fruit trees to diversify the parcel's production with
02:40:49 10 species such as Persea Americana of the Lauraceae family
11 (Hass avocado), currently 174 manzanas."

12 Q. And is that accurate?

13 A. We were staking off land problem which it was
14 there and we had by -- we were planting. We were -- we
02:41:06 15 had planted the area that you see planted on the
16 pictures of the satellites. 44.75 hectares.

17 Q. Was it accurate about the avocados then?

18 A. Yes, it was.

19 Q. And you still had coffee in production at that
02:41:36 20 time?

21 A. Yes, it was. We quit -- the last coffee
22 harvest took place and closed from 2015 to 2016. So by
23 mid March of 2016, we were no longer in coffee.

24 Q. But in the time prior to that, 2000 -- well,
02:42:06 25 2013, I think you said was Roya, then 2014. What coffee

02:42:10 1 production was happening?

2 A. The last coffee production was over
3 800,000 pounds of coffee at Hacienda Santa Fé.

4 Q. To clarify, was that in the 2015-2016 season?

02:42:23 5 A. Yes. And I do have a film of that.

6 MR. HILL: Could I have page 11, please?
7 Of the same document. Oh, page 4, yes. Back to page 4.
8 The highlighted portion, could you --

9 Q. Is that accurate that you were still in organic
02:43:01 10 coffee at that time?

11 A. No. We were out of coffee March of 2016. This
12 is for the Jaguar, I believe.

13 MR. HILL: Go back up to paragraph -- same
14 page. Down to where it says Jaguar.

02:43:20 15 Q. Okay. Is that the reserve that you were
16 talking about before?

17 A. Yes.

18 Q. And what did the Jaguar project inform you as
19 far as the private wildlife reserve and its operations?

02:43:39 20 A. The owner of the Jaguar, a Swiss citizen
21 married to a Nicaraguan lady --

22 Q. Let me clarify the question.

23 What did the private wildlife reserve
24 El Jaguar inform you about the ability to continue
02:44:01 25 agriculture with a private wildlife reserve?

02:44:05 1 A. That we could do the same thing. We could keep
2 on doing what we were doing. And he had done so. Can I
3 say something?

4 Q. No.

02:44:33 5 MR. HILL: One moment, Your Honor. I've
6 got to stop that. Mr. President, one moment, please.

7 Q. Thank you. Thank you, Mr. Rondón.

8 MR. HILL: Any questions from the
9 Tribunal, please? Mr. Rondón, the Tribunal may have
02:44:49 10 questions for you.

11 MR. RONDON: Yes, I am open, and I welcome
12 them.

13 PRESIDENT: Thank you, Mr. Hill. So this
14 completes your redirect examination?

02:44:59 15 MR. HILL: It does, Mr. President.

16 PRESIDENT: There are no questions from
17 the Tribunal, Mr. Rondón. Thank you very much for your
18 time, so you are released.

19 MR. RONDON: I'm free now?

02:45:24 20 PRESIDENT: Yes. A free man.

21 MR. RONDON: Thank you very much. I
22 appreciate it. I hope I wasn't a boring person to you
23 guys.

24 PRESIDENT: Well, at least measured by the
02:45:35 25 time that was spent on your examination, you are a very

02:45:39 1 important person.

2 MR. RONDON: Thank you.

3 PRESIDENT: Thank you very much. Let's
4 break now for 15 minutes, and we will resume at 3 p.m.

02:45:54 5 *(Brief Recess)*

6 PRESIDENT: We will resume the afternoon
7 session. The next witness will be Mr. Gutiérrez.

8 **LUIS ADOLFO GUTIÉRREZ CRUZ**

9 PRESIDENT: Good afternoon, Mr. Gutiérrez.

03:06:46 10 You can keep the microphone on during your examination.

11 Can I first ask you to state your full
12 name for the record.

13 THE INTERPRETER: Mr. President, this is
14 the interpreter. I don't think Mr. Gutiérrez is on the
03:07:08 15 right channel.

16 PRESIDENT: Okay. The secretary will help
17 you. So you can keep the microphone on.

18 I was asking you to state your full name
19 for the record, please.

03:07:42 20 MR. GUTIÉRREZ: My name is Luis Adolfo
21 Gutiérrez Cruz. Luis Adolfo Gutiérrez Cruz, that's my
22 name.

23 PRESIDENT: Thank you very much. You are
24 appearing as a witness of fact in this arbitration
03:08:04 25 proceeding, and you will be therefore required to

03:08:06 1 confirm that you are telling the truth, so for that
2 purpose can I ask you to make the witness declaration?
3 You should have the text of the declaration that you
4 should read in front of you.

03:08:25 5 MR. GUTIÉRREZ: I solemnly declare upon my
6 honor and conscience that I shall speak the truth, the
7 whole truth and nothing but the truth.

8 PRESIDENT: Thank you very much. You have
9 submitted two witness statements in this arbitration.
03:08:41 10 The first one dated 5 October, 2022 and the second one
11 27 October 2023. You should have hard copies of those
12 statements in front of you. Do you have them?

13 MR. GUTIÉRREZ: I do have them, sir.

14 PRESIDENT: Can you please review them and
03:09:04 15 confirm that they are your statements?

16 MR. GUTIÉRREZ: That is right,
17 Mr. President.

18 PRESIDENT: Thank you very much. I'm sure
19 counsel has explained to you how your examination is
03:09:36 20 going to proceed, but let me just summarize it briefly
21 for you.

22 There will be first a brief direct
23 examination by counsel for the Claimant, Riverside,
24 followed by cross-examination by the Respondent's
03:09:55 25 counsel. The Claimant's counsel will have an

03:09:57 1 opportunity to put to you further questions arising out
2 of the cross-examination, and the three members of the
3 Tribunal may put questions to you at any time. Is this
4 understood?

03:10:11 5 MR. GUTIÉRREZ: Yes, Mr. President.

6 PRESIDENT: Thank you very much. Over to
7 the Claimant.

8 MR. MULLINS: Thank you, Mr. President.

9 **DIRECT EXAMINATION**

03:10:25 10 BY MR. MULLINS:

11 Q. Good afternoon, Mr. Gutiérrez.

12 A. Good afternoon, sir.

13 Q. Do you have any additional corrections --

14 Do you have any corrections to your second
03:10:45 15 witness statement, Mr. Gutiérrez?

16 A. I couldn't hear you because I wasn't wearing my
17 headset at the beginning. Can you repeat?

18 Q. Sure. Do you have any corrections to your
19 second witness statement?

03:11:03 20 A. Yes, sir.

21 Q. I'll point you to paragraph 9(b), page 2 of
22 your statement. Can you tell us the correction you have
23 there?

24 A. I want to correct paragraph 37 to 47 and then
03:11:27 25 65 and 69 to my first statement. And also I would like

03:11:33 1 to correct the date. Where it says 16 June, it should
2 be 16 July.

3 Q. Thank you. You mean that you want to correct
4 the second statement correction, correct?

03:11:48 5 A. Yes, sir.

6 Q. Thank you. And then if you go to
7 paragraph 9(q) on page 3, can you tell us the correction
8 you need to make there?

9 A. I would like to correct paragraph 202 and
03:12:09 10 change it to paragraph 173 of my first statement.

11 Q. And, finally, paragraph 213 on page 41 of your
12 witness statement?

13 A. Yes, sir. 16 July, that date needs to be
14 corrected. It says 2023. That's incorrect. It should
03:12:38 15 be 2018.

16 Q. Thank you. Just very briefly, could you
17 describe your education and experience in agronomy very
18 briefly?

19 A. Yes, sir. I am an agronomist. An agronomist
03:12:59 20 is a professional that uses his knowledge and skills in
21 the agricultural sector.

22 I grew up in a family of farmers. We had
23 a farm. We also had livestock, and very early on I
24 started working the land.

03:13:23 25 Q. Do you have a degree in agronomy?

03:13:27 1 A. That is correct, sir.

2 Q. Real briefly, what is your degree?

3 A. My degree is agronomist. An agricultural
4 sciences engineer.

03:13:45 5 Q. When you started at Hacienda Santa Fé, what was
6 your role?

7 A. I started in 2014, on 16 March, and I worked on
8 the administrative side of things.

9 Q. And you were involved in payroll?

03:14:03 10 A. Yes, sir. I worked in payroll between 2014 and
11 then 2015 and 2016.

12 Q. Was Mr. Domingo Ferrufino on the payroll?

13 A. Yes, sir. In 2014 and in 2015, he was included
14 in the payroll as a contractor. In 2016, he was
03:14:29 15 included in the payroll as a security guard.

16 Q. Let's jump to the 2018 invasion. Was that
17 the -- let me ask you, when did you learn about the
18 June 2018 invasion?

19 A. Yes, sir. On 16 June 2018, the first invasion
03:14:56 20 took place in upper Santa Fé.

21 Q. And did you talk to -- how did you know about
22 the invasion?

23 A. Yes, sir. The day before June 16, the invaders
24 met in the outside portion of the Hacienda Santa Fé.

03:15:23 25 First, I realized because I saw a group of workers, and

03:15:28 1 I decided to go there and see what their purpose was.

2 Q. Do you know if the government was involved in
3 that invasion?

4 A. Yes, sir.

03:15:38 5 Q. How do you know?

6 A. First, because of the security guards, and then
7 the invaders themselves.

8 Q. And had you ever seen anything like that before
9 in your years at Hacienda Santa Fé as far as the

03:15:59 10 invasion?

11 A. No, sir.

12 Q. Did you speak to Captain Herrera?

13 A. Yes, sir.

14 Q. Did Captain Herrera mention anything about an
03:16:10 15 order requiring the police to remain in the barracks?

16 A. Never, sir.

17 Q. And you said you spoke to the invaders. What
18 did they tell you?

19 A. The invaders said to me that they were coming
03:16:37 20 to take Santa Fé because the government of Nicaragua was
21 giving the Hacienda Santa Fé to them.

22 Q. Was there another invasion in July 2018?

23 A. That is correct, sir.

24 Q. Did you speak to invaders then?

03:16:55 25 A. I did, sir.

03:16:56 1 Q. What did they tell you?

2 A. The same thing, that we had nothing to do there
3 because the property was theirs because the government
4 of Nicaragua had given the property to them.

03:17:09 5 Q. Did you talk to anyone from the government
6 during this time period?

7 A. Yes, sir.

8 Q. Who did you speak to, sir?

9 A. I met with Mr. Favio Dario Enriquez Gómez in
03:17:31 10 one of the barricades that they themselves had set up in
11 the department of Jinotega.

12 Q. You say "they themselves." What do you mean
13 "they"?

14 A. They were the state workers from a number of
03:17:48 15 institutions. Educational part, MAGFOR, Inta.

16 Q. What did Mr. Enriquez tell you when you spoke
17 to him?

18 A. I ran into him in the barricade and I told him,
19 first and foremost, that they had fully invaded in the
03:18:11 20 Hacienda Santa Fé, and then he spoke to me and he said,
21 "Yes, the government is doing that to exert pressure on
22 the private company to de-escalate the protests against
23 the government."

24 Q. Mr. Gutiérrez, do you still reside in
03:18:32 25 Nicaragua?

03:18:37 1 A. No, sir.

2 Q. And why is that, sir?

3 A. I left Nicaragua on 12 January. I have some
4 colleagues working for the State that let me know that
03:18:56 5 the State of Nicaragua had given orders to the police to
6 put drugs in my home and in my truck.

7 Q. Have you ever experienced -- can you tell the
8 Tribunal what impact, if any, the invasions and the
9 situation has had on you and your family?

03:19:26 10 A. This has caused psychological issues.

11 MR. GUTIERREZ: Mr. President, just one
12 moment, if you'll allow me, please.

13 PRESIDENT: Take your time.

14 A. Mr. President, I've been traumatized because of
03:20:23 15 the constant threats that I received by these invaders,
16 these paramilitary invaders that came into the Hacienda
17 Santa Fé.

18 Q. Have you sought therapy?

19 A. Yes, sir.

03:20:49 20 Q. Mr. Gutiérrez, are you being paid to testify
21 here today?

22 A. No, sir.

23 Q. Then why are you putting yourself through this,
24 sir?

03:21:07 25 A. Because of professional ethics and because of

03:21:09 1 the values that my parents instilled in me.

2 MR. MULLINS: Mr. Chair, pursuant to the
3 procedural order, I'm going to ask some brief questions
4 arising from the Rejoinder. I think we're right on
03:21:26 5 time.

6 MS. GREENWOOD: Before you do that,
7 Counsel, can I just clarify a point with the witness?

8 Q. Mr. Gutiérrez, you mentioned you left on the
9 12th of January. Could you help the Tribunal with which
03:21:38 10 year you meant?

11 MR. GUTIERREZ: 2024, ma'am.
12 12-January 2024.

13 MS. GREENWOOD: So relatively recently.
14 Yes, I'm with you. This year?

03:21:51 15 MR. GUTIERREZ: Yes.

16 MS. GREENWOOD: Thank you.

17 Q. A just brief follow-up with that,
18 Mr. Gutiérrez. Have you gone back and forth from
19 Nicaragua?

03:22:12 20 A. Back and forth? Well, in 2018 I went to
21 Costa Rica, and then in 2019, in October -- in 2018 and
22 in 2019, and right now I have left Nicaragua
23 definitively.

24 Q. Thank you. Going back to questions that come
03:22:34 25 from the Rejoinder material, Mr. Gutiérrez, have you

03:22:39 1 seen a drone video that Nicaragua has introduced with
2 its materials?

3 A. I have, yes.

4 Q. And if we can put on the screen a screenshot
03:22:54 5 from the video. And this would be R-231 that was
6 actually shown to the Tribunal at the beginning of the
7 hearing.

8 And, Mr. Gutiérrez, given your experience
9 in agronomy and your experience at Hacienda Santa Fé,
03:23:18 10 could you just briefly tell us if you see -- what do you
11 see here in terms of the vegetation and how it's changed
12 since the invasions of Hacienda Santa Fé?

13 A. Yes, sir. I'm aware that this video was taken
14 in 2024. This happened after the invaders were evicted
03:23:53 15 more than two years ago. Here, you can see that there's
16 a lot of brush that has grown. This is not forest.
17 This is brush. It is new. It is growing from the soil.
18 In the past, before 2018, these were forested areas.

19 Q. I think in front of you -- I'll ask you one
03:24:17 20 thing. Could you put the microphone closer to you? I
21 think you need the microphone just a little closer so
22 everyone can hear you. Thank you.

23 I think you have in your hand a laser
24 pointer. Maybe if you can turn around -- on the one
03:24:36 25 behind you -- turn around. Turn around.

03:24:48 1 A. Yes, sir.

2 Q. If you could use the laser pointer and show us
3 where the forest was when you were working at Hacienda
4 Santa Fé before the invasions? And you can use the
03:25:03 5 microphone over by the table. Maybe just point and just
6 talk to us.

7 Given the limited time, can you use your
8 laser pointer, show it to us and talk into the
9 microphone.

03:26:02 10 A. This section right here where you can see right
11 here, this is a water body. This was forest in the
12 past. We called this section of the forest "the tank."
13 Here we had countless walnut trees, but you can see now
14 is that just very clear-colored brush. This is new
03:26:29 15 brush that has grown in this soil area.

16 Q. Stop for a moment. Just for the record, the
17 witness has pointed to the lower quadrant of the screen,
18 just for the record, for use of the transcript later.

19 Please go ahead.

03:26:53 20 A. Then, where you can see some chagüite brushes,
21 and all of this was, in the past, forest. These were
22 planted by the invaders.

23 In the past, this was Encino trees and
24 walnut trees, but what you can see now here is a
03:27:19 25 clear-colored brush that started growing since they were

03:27:22 1 evicted a few years back.

2 MR. MULLINS: Again, just for the record,
3 the witness was pointing to the area to the right
4 quadrant next to the buildings. And you were about to
03:27:35 5 point to the top of the screen. If you'd just tell us
6 what you see there.

7 A. Yes, right here where you see this light green
8 color and the contours of this, all this used to be
9 forest. This was a primary forest that was destroyed
03:27:58 10 for the purpose of logging the wood and to plant
11 vegetables.

12 Q. Thank you very much. Just a few more questions
13 arising from the Rejoinder.

14 In the Rejoinder, Nicaragua has talked
03:28:16 15 that the avocado expansion was too close to the rivers
16 in Nicaragua. Do you agree with that, sir? The Hass
17 avocado growing was too close to the rivers. Do you
18 agree with that?

19 A. No, sir.

03:28:36 20 Q. And why not, sir?

21 A. I personally, with the support of the
22 workers -- well, we conducted measurements in the area
23 closer to the avocado plantations near the river. And
24 the plantation was called La Frijolera.

03:29:05 25 Q. Mr. Gutiérrez, the other thing I want to raise

03:29:07 1 with you is witness José López has said that there
2 actually was another invasion in 2017 of Hacienda
3 Santa Fé. Are you aware of that testimony?

4 A. Yes, sir. And that is incorrect.

03:29:26 5 MS. GONZÁLEZ: Excuse me, Mr. President.
6 I am sorry to interrupt, but the direct examination has
7 gone for longer than 20 minutes.

8 MR. MULLINS: We took a break during his
9 breakdown, and I didn't think that would be counted
03:29:39 10 against us. I've only got two more or a couple more
11 questions. But I thought during the break -- I really
12 am almost done.

13 PRESIDENT: We are still within the time
14 limit taking into account the time it took to point to
03:29:53 15 the screen. So please go on and finish.

16 MR. MULLINS: Really short.

17 Q. So how do you know that there wasn't an
18 invasion of Hacienda Santa Fé in 2017?

19 A. No, there was no invasion in 2017, sir.

03:30:13 20 Q. How do you know that to be true, sir?

21 A. Because the security guards, they conducted a
22 weekly patrol. Later on, I went with them twice a
23 month. I went with them on the patrols, and I know this
24 farm like the back of my hand.

03:30:41 25 Q. And, finally, Mr. Gutiérrez, as the

03:30:47 1 administrator of Hacienda Santa Fé INAGROSA in August of
2 2018, did Nicaragua ever issue a handover certificate or
3 any formal document that formally turned the property
4 over to INAGROSA in August 2018?

03:31:13 5 A. No, sir.

6 MR. MULLINS: I have no further questions.
7 Thank you so much. I think we'll have questions from
8 counsel.

9 PRESIDENT: Thank you, Mr. Mullins.
03:31:25 10 Respondent?

11 MS. GONZÁLEZ: Mr. Zuniga will conduct the
12 cross-examination.

13 PRESIDENT: Thank you very much. Please
14 proceed.

03:31:37 15 **CROSS-EXAMINATION**

16 BY MR. ZUNIGA:

17 Q. Good afternoon, Mr. Gutiérrez, and welcome.

18 A. Good afternoon.

19 Q. Clearly, I will be asking you the questions in
03:31:45 20 Spanish, but for objections and anything that your
21 attorney would like to add, please keep the headset on
22 at all times.

23 A. Understood.

24 Q. Mr. Gutiérrez, do you have any previous
03:32:01 25 experience providing statements before a Tribunal?

03:32:05 1 A. Yes, sir. Not making a statement, but I was a
2 juror in Nicaragua.

3 Q. But not providing a statement before a
4 Tribunal?

03:32:14 5 A. No. I was asked by the judiciary to serve as a
6 member of a jury during a trial.

7 Q. When was that?

8 A. That was in 2017.

9 (Technical discussion)

03:32:39 10 PRESIDENT: Also, for the benefit of
11 Mr. Gutiérrez, when you hear the question, don't answer
12 immediately. Have a brief pause so that the
13 interpreters and court reporters can catch up. Of
14 course the same, when you hear the answer, please have a
03:32:59 15 brief pause.

16 MR. GUTIERREZ: I thank you,
17 Mr. President. I will proceed accordingly.

18 Q. Let me offer you some instructions to make sure
19 that this is going to proceed seamlessly.

03:33:18 20 As the President mentioned, please allow
21 me to finish my question before answering. As you may
22 have seen, we have court reporters and also interpreters
23 today, and their work, it's a little bit more
24 complicated if we overlap our voices. Okay?

03:33:35 25 A. Okay.

03:33:36 1 Q. So please make all your answers heard. I
2 always need to hear your answer and just a movement of
3 your hand or head, that won't be enough.

4 A. It depends on your question.

03:33:51 5 Q. And if you do not understand the question,
6 please let me know and I will restate the question.

7 A. I will proceed accordingly.

8 Q. Mr. Gutiérrez, how have you prepared to provide
9 your statement today in this hearing?

03:34:10 10 A. I have not prepared at all.

11 Q. So you have not prepared yourself to come and
12 provide your statement?

13 A. I prepared to travel from where I live.

14 Q. Haven't you reviewed any documents before
03:34:25 15 coming here?

16 A. Yes, sir.

17 Q. What documents?

18 A. My statements.

19 PRESIDENT: Remember what I said two
03:34:34 20 minutes ago? Wait for the question to finish before you
21 start your answer. Have a brief break between the two.
22 Otherwise, it will be very difficult for the
23 interpreters who are translating at the same time as you
24 speak into English.

03:34:55 25 MR. MULLINS: I do have an objection.

03:34:58 1 What documents that counsel may have given the witness
2 is work product privileged. Typically he can ask what
3 documents were reviewed, but he certainly can't ask what
4 documents we used for preparation for his testimony.

03:35:12 5 It's inappropriate.

6 PRESIDENT: I understand the question
7 about the preparation of the witness statements. You
8 may want to clarify what your question was.

9 MR. ZUNIGA: I was about to do that,
03:35:22 10 Mr. President. Thank you.

11 Q. Mr. Gutiérrez, have you reviewed a copy of
12 Claimant's Memorial?

13 A. No, sir.

14 Q. A copy of the Counter-Memorial presented by
03:35:36 15 Nicaragua?

16 A. No, sir.

17 Q. A copy of the Reply?

18 A. No, sir.

19 Q. And how about the Rejoinder?

03:35:48 20 A. No, sir.

21 Q. Have you reviewed any copies of witness
22 statements submitted by other witnesses in this case?

23 A. No, sir.

24 Q. How about copies of expert reports?

03:36:08 25 A. No, sir.

03:36:10 1 Q. Haven't you reviewed a copy of Mr. Duarte,
2 Odilo Duarte, one of the experts?

3 A. Now that you mentioned that name, yes, sir.

4 Q. Mr. Gutiérrez, do you speak English?

03:36:27 5 A. No, sir.

6 Q. Are you aware of the statements by
7 Mr. Ferrufino and Mr. Rondón in this hearing?

8 A. No, sir.

9 Q. Mr. Gutiérrez, you have submitted two
03:36:45 10 statements in this arbitral proceeding, correct?

11 A. That is correct.

12 Q. Based on your second statement, you include a
13 section with corrections, correct?

14 A. Correct.

03:37:00 15 Q. And this second section also includes 19
16 corrections to your first statement, correct?

17 A. Correct.

18 MR. ZUNIGA: Ricky, can you please pull up
19 CWS-10?

03:37:16 20 Q. I just asked Mr. Dyer to show on the screen
21 your second statement. Paragraph 9.

22 On the screen we see paragraph 9 of your
23 second statement. That is "Corrections to my previous
24 witness statement," correct?

03:37:48 25 A. Yes.

03:37:48 1 Q. And if we look at the next three to four pages,
2 these corrections go from subparagraph (a) to
3 subparagraph (s), correct?

4 A. Correct.

03:38:10 5 Q. Mr. Gutiérrez, what were the reasons that led
6 you to introduce 19 corrections to your first statement?

7 A. Sir, my first statement was written in 2022,
8 October 2022. Psychologically I was impacted as well as
9 mentally impacted. During that year I was working with
03:38:40 10 a psychologist.

11 Q. So what you are saying is that you were
12 mentally impaired, and that that had an impact on your
13 memory?

14 A. Because of the threats of the invaders and the
03:38:54 15 government's paramilitaries.

16 Q. So your recollection was not accurate?

17 A. In 2023, in October, I was able to correct
18 because psychologically, with some professional help, I
19 was in a better situation.

03:39:26 20 Q. Before providing your first witness statement,
21 did you review any notes? Any of your notes?

22 A. Yes, sir.

23 Q. Where are those notes?

24 A. I used emails sent to Mr. Carlos Rondón.

03:39:45 25 Q. For clarity of the record, you just said that

03:39:48 1 you used emails to prepare your first statement,
2 correct?

3 A. Sir, I understand that that is the second
4 correction, or was it the first one?

03:40:02 5 Q. I am referring in general to corrections.

6 A. In my second correction, I reviewed my emails,
7 and I -- and what happened at Finca Santa Fé.

8 Q. Weren't those emails available when you
9 prepared your first statement?

03:40:23 10 A. Sir, because of what I mentioned before, what I
11 described, at that time I was traumatized, and just to
12 mention that I did not even have access to the computer
13 throughout the year because whenever I saw and I
14 recalled that, that led me to have a psychological
03:40:47 15 trauma. I have endangered my own family.

16 Q. And that affected your recollection, correct?

17 A. Well, I guess you're trying to tell me I'm
18 crazy. I am not crazy.

19 Q. No, I didn't say that.

03:41:05 20 A. You're telling me that it impacted my mind, so
21 psychologically I was impacted, and I made some grammar
22 mistakes.

23 Q. What I said is that it had an impact on your
24 memory, not your mind.

03:41:22 25 A. Well, that is what I understood.

03:41:28 1 Q. Mr. Gutiérrez, I asked you where the notes are,
2 the notes that you used to prepare your first statement?

3 A. Sir, let me reiterate that. I logged into the
4 computer, and I took a look at my emails.

03:41:43 5 Q. And beyond the emails, didn't you have any
6 other notes or writings?

7 A. Yes, I did have some notes from a tree survey
8 that we had in Hacienda Santa Fé that I found with my
9 personal belongings.

03:42:08 10 Q. Mr. Gutiérrez, you mentioned that you started
11 your college studies in 2006 at the People's University
12 of Nicaragua, correct?

13 A. I first studied at INATEC, where I obtained an
14 agriculture technical degree during two years, and then
03:42:32 15 I completed my studies at the People's University of
16 Nicaragua, UPONIC, where my two years at the institute
17 were recognized.

18 Q. And you indicated that in 2018 -- you graduated
19 in 2018, correct?

03:42:49 20 A. Yes.

21 Q. And that you became an agricultural engineer in
22 2019, correct?

23 A. Yes.

24 *(Technical discussion off the record)*

03:43:32 25 Q. So you graduated as an engineer in 2019,

03:43:37 1 correct?

2 A. Yes. That was in 2019, because I did not have
3 the financial means to pay for the degree.

4 Q. That is between 2018, when you met the
03:43:51 5 requirements to obtain the degree, and 2019, when you
6 actually had the degree, did you have to do something
7 else in addition to paying to obtain the title?

8 A. Sir, I had completed my studies, but the degree
9 was not given to me because in Nicaragua you need to
03:44:11 10 pay. This degree was \$1,000.

11 Q. Did you have to prepare a thesis?

12 A. I had already presented my thesis and defended
13 it, but I had not been given the actual title. I
14 already had the paper that said that I was a graduate as
03:44:36 15 an agricultural engineer.

16 Q. So we can say that you are an engineer, an
17 agricultural engineer, as of 2019?

18 A. Yes, because that is the time when the degree
19 was issued.

03:44:53 20 Q. Mr. Gutiérrez, do you have any studies in
21 business administration?

22 A. No, sir.

23 Q. Do you have any studies in accounting?

24 A. No, sir.

03:45:04 25 Q. Do you have any studies in finance?

03:45:07

1

A. No.

2

Q. Do you have any studies in foreign trade?

3

A. No, sir.

4

Q. Do you have any studies in forestry?

03:45:19

5

A. No, sir, but I did have a class called

6

"forestry".

7

Q. Mr. Gutiérrez, you stated that at 18 years of

8

age you became a tomato, cabbage and lettuce producer,

9

that you were working on -- and you were working on that

03:45:42

10

that within the facilities of your family, within the

11

land of your family, correct?

12

A. Yes. I started at 10 years of age, and I

13

started to work on the fields at that age.

14

Q. What is the size of the land of your family?

03:46:55

15

(Technical discussion off the record)

16

PRESIDENT: Let's go on. Another try.

17

Q. Let me repeat my last question. I'm sorry, I'm

18

changing channels because the other one was Spanish.

19

So let me repeat my last question for

03:47:22

20

clarity of the record.

21

A. Yes.

22

Q. So you asserted that as of 18 years of age, you

23

became a tomato, lettuce and cabbage producer using the

24

lands of your family, correct?

03:47:34

25

A. Yes.

03:47:37 1 Q. What is the size of your family's plot?

2 A. 4 hectares. To be a vegetable producer, you
3 don't need to have a piece of land. You can also rent
4 it in Nicaragua.

03:48:00 5 Q. And you stated that in 2009, you started to
6 work with the Ministry of Agriculture and Forestry,
7 correct?

8 A. Yes, sir.

9 Q. And you stated that you worked as a technical
03:48:17 10 consultant with MAGFOR for the food bonds, correct?

11 A. Yes.

12 Q. And in that position, you trained and provided
13 technical assistance to low income families and women
14 for the development and handling of cattle and poultry,
03:48:39 15 correct?

16 A. Yes.

17 Q. Later on, you mentioned that in 2011, you
18 started to work for a company, CISA, a company that was
19 exporting green coffee, and you were one of the
03:48:57 20 purchasers, correct?

21 A. Yes, this is a company that is currently ceased
22 and that is exporting coffee worldwide.

23 Q. Mr. Gutiérrez, you have stated that you started
24 to work in 2014 at Hacienda Santa Fé in the area of
03:49:15 25 coffee production but with administrative chores,

03:49:18 1 correct?

2 A. Yes. I worked in the administration portion of
3 it where we kept the records of field work.

4 Q. You did not work on the field?

03:49:29 5 A. As an agricultural technician, I was involved
6 and Mr. Carlos Rondón saw this, and this is the reason
7 why he hired me.

8 Q. And according to your statement, only as of
9 2015 you started to work on the Hass avocado project,

03:49:52 10 correct?

11 A. Yes, because if you look at -- they looked at
12 my experience, my knowledge in the coffee area and then
13 in 2014 -- I was later on promoted in 2015 to be
14 involved in the production of avocado.

03:50:13 15 Q. And before 2015, you didn't have any
16 theoretical or practical knowledge as to the caring and
17 development of a Hass avocado grove, correct?

18 A. It is more difficult to have a coffee crop than
19 avocado crop.

03:50:30 20 Q. That was not my question.

21 My question was whether, prior to 2015,
22 you had any practical or theoretical experience with the
23 management and caring of an avocado grove?

24 A. I did not have any practice, but I did have
03:50:48 25 knowledge.

03:50:52 1 Q. As a matter of fact, before starting to work at
2 Hacienda Santa Fé, you had never worked in an industrial
3 plantation, correct?

4 A. No, sir. But I was involved with the land, I
03:51:07 5 had knowledge about the land and everything that had to
6 do with the agricultural sector. And that is not much
7 of a difference.

8 Q. And you have also recognized that you developed
9 your knowledge in the production and the development of
03:51:22 10 Hass avocado through research and also by observing
11 engineers Darwin Zeledón and Rodrigo Jiménez.

12 A. In 2015, the answer is yes, I developed my
13 knowledge, and I think I became an expert, in my
14 opinion.

03:51:41 15 Q. Do you think you're an expert on Hass avocado?

16 A. In the area that I have worked on the avocado
17 Hass, I think that I have a good deal of knowledge.

18 Q. I am going to reiterate my question. Do you
19 consider yourself an expert on Hass avocado?

03:52:03 20 A. Let us say that I am not a real expert because
21 you never stop learning in life.

22 Q. Just for clarity of the record, you started to
23 work on the Hass avocado project at Santa Fé in 2015,
24 correct?

03:52:25 25 A. Could you please repeat your question? I did

03:52:28 1 not understand your introduction to the question.

2 Q. I just wanted to confirm with you that you
3 started to work on the Hass avocado project in 2015.

4 A. Correct.

03:52:41 5 Q. I assume that you stopped working on that
6 project in 2018?

7 A. Correct. When it was -- when the Hacienda
8 Santa Fé was invaded and seized.

9 Q. According to your statement, Mr. Gutiérrez, in
03:53:02 10 March 2016 you were promoted to the chief agronomist at
11 Santa Fé, replacing Darwin Zeledón, the engineer?

12 A. Correct.

13 Q. Mr. Gutiérrez, where were the documents, the
14 corporate documents, kept, payroll records in connection
03:53:25 15 with INAGROSA's business?

16 A. All of the internal documents, and also related
17 to the control of the Hacienda Santa Fé, were kept in my
18 office, in my office within the Hacienda Santa Fé.

19 Q. Is it correct to say that your office was
03:53:44 20 within the house of Hacienda Santa Fé?

21 A. Exactly.

22 Q. And the Hacienda Santa Fé house is in the lower
23 part of Santa Fé, correct?

24 A. Yes.

03:53:58 25 Q. Mr. Gutiérrez, did you have a computer for

03:54:01 1 carrying out your duties as a chief agricultural
2 engineer and administrator?

3 A. Yes, I did have a computer that was the
4 property of Hacienda Santa Fé.

03:54:17 5 Q. Was it a personal computer, a laptop?

6 A. No, sir. It was a desktop that had all of the
7 records.

8 Q. Mr. Gutiérrez, when you started to work at
9 Hacienda Santa Fé, what were the activities that were
03:54:34 10 taking place to generate revenue?

11 A. When I started, we had coffee production.

12 Q. Is it true that the Roya fungus had a severe
13 impact on the crop?

14 A. The impact was widespread in Nicaragua.
03:54:58 15 Throughout the plantations there was an impact, and the
16 coffee crops were reduced in volume.

17 Q. As we have already discussed, in 2014 the Hass
18 avocado project started at Hacienda Santa Fé, correct?

19 A. Yes, in the lower part of Santa Fé where we had
03:55:24 20 no coffee crops.

21 Q. Mr. Gutiérrez, did you know that in
22 August 2015, Carlos Rondón presented an application
23 before MARENA to declare Hacienda Santa Fé a private
24 wildlife reserve?

03:55:40 25 A. I understand that it was just an evaluation.

03:55:44 1 It was not an application.

2 Q. I don't think that you understood my question.

3 Do you know that in 2015, Mr. Rondón applied before

4 MARENA to declare Hacienda Santa Fé as a private

03:55:57 5 wildlife reserve?

6 A. As far as I know, he requested a study. A

7 study of Finca Santa Fé.

8 Q. What was the study intended for?

9 A. That study was to assess the wealth within

03:56:20 10 Hacienda Santa Fé regarding the birds, the hydrology,

11 the forests and the soil.

12 MR. ZUNIGA: Ricky, can we put up

13 Exhibit C-83, please, in Spanish.

14 Q. Mr. Gutiérrez, do you see the document?

03:57:20 15 A. Yes, sir.

16 Q. In there, we see at the top of the document

17 that this is a form to request the recognition and

18 approval of a property or part of that property as a

19 private wildlife reserve?

03:57:45 20 A. That was a form that was a requirement

21 presented by MARENA for Mr. Carlos Rondón to be able to

22 have an assessment done.

23 Q. Mr. Gutiérrez, did you know that on May 26,

24 2016, INAGROSA presented a new application to declare

03:58:12 25 Hacienda Santa Fé a private wildlife reserve?

03:58:16 1 A. No, sir. I understand that the party that
2 declares private wildlife reserves, when approved, is
3 the government of Nicaragua.

4 Q. Mr. Gutiérrez, are you familiar with the
03:58:38 5 regulations of the National Water Authority as to the
6 use of water on agricultural properties?

7 A. I have some knowledge about it.

8 Q. Are you aware of the regulations for the
9 sustainable development of resources -- forestry
03:59:06 10 resources?

11 A. Yes, sir.

12 Q. Mr. Gutiérrez, you stated in your first
13 statement that days before the first invasion, a group
14 of workers from Hacienda Santa Fé told you that they had
03:59:23 15 seen a large number of unknown individuals gathering at
16 a neighboring location and they were prowling around the
17 Hacienda, correct?

18 A. Yes.

19 Q. And did you report -- and you reported about
03:59:45 20 the presence of these prowlers to Mr. Rondón, correct?

21 A. First I did it to Mr. Rondón and next to
22 Captain William Herrera with the National Police Force.

23 Q. And you told Mr. Rondón that based on the
24 information you had, these unknown individuals intended
04:00:06 25 to invade Hacienda Santa Fé?

04:00:11

1 A. Correct.

2 Q. And one of the sources of information that you
3 had was from a man known as Jaime Vivas. Is that right?

04:00:26

4 A. First, I learned of it through three workers
5 who were heading to their homes. That was the day
6 before the invasion. That was on 15 June. I omit the
7 names of these persons -- well, it's in my declaration.

04:00:54

8 Alfredo González, Juan Gómez were heading to their
9 homes, and then they were coming back to tell me:
10 "Luis, there are a group of persons at La Providencia.
11 They're at the school." "How many?" "Approximately
12 200." So I decided to go on my motorcycle to inspect
13 whether it was true that that group was there.

04:01:12

14 Once I confirmed that the group was there,
15 I returned to the Hacienda, and then I spoke with Jaime
16 Vivas. I told him: "Jaime, go to that group of
17 invaders, those people don't know you, infiltrate them
18 and figure out who is leading that meeting and what
19 the -- that gathering -- and what the objective is."

04:01:37

20 Q. And you have said that at that time the
21 Hacienda had three security guards who were in charge of
22 protecting it, correct?

23 A. We had three security guards in the lower part
24 and two in the upper part.

04:01:54

25 MR. ZUNIGA: Ricky, can we put up CWS-2,

04:02:10 1 paragraph 31?

2 Q. I'd like to show you paragraph 31 of your first
3 statement. And there it says:

4 "Hacienda Santa Fé had a security team
04:02:21 5 based on site that would patrol the area and ensure
6 security of equipment and our production. There were
7 only three security guards in charge of protecting
8 Hacienda Santa Fé."

9 A. Sir, in that paragraph I refer to the three
04:02:39 10 security guards in the lower part, as we refer to it, of
11 Hacienda Santa Fé.

12 Q. Nowhere in your first statement do you make
13 reference to the other two guards who you just
14 mentioned. Is that right?

04:02:52 15 A. Yes, sir, because we had not yet understood
16 where they were going to enter, whether in upper
17 Santa Fé or lower Santa Fé.

18 Q. But you did know that they were going to enter?

19 A. Yes, sir. But we did not know where they were
04:03:12 20 going to enter. Bearing in mind that the main house
21 appeared to be their initial objective. But that wasn't
22 so. They ended up entering in the upper part. So in
23 this paragraph I make reference to the three security
24 guards -- Raymundo Palacios, Domingo Ferrufino and
04:03:34 25 Danilo Gutiérrez -- they are the ones who are generally

04:03:39 1 in the lower part. In the upper part, José Efrain
2 Chavarria, who we call Chepon -- I'm sorry, Payin -- and
3 José Francisco, who is known as Chepon. They are the
4 two guards for upper Santa Fé.

04:03:58 5 Q. And given the information that you were on top
6 of, didn't you think it would have been appropriate to
7 have hired more security guards?

8 A. Sir, due to the fact that that happened
9 quickly -- to hire security guards, there's a whole
04:04:15 10 process of inspection that's required. You have to look
11 through the recommendations and figure out what kind of
12 person it is because you cannot turn a weapon over to
13 just any person. At that moment on that day, it was
14 difficult for us to hire more.

04:04:33 15 Q. Mr. Gutiérrez, you have also said that you were
16 concerned about the violence that might be unleashed if
17 you were to confront the invaders. Is that not so?

18 A. Yes. You know, 200 people, knowing the
19 intention with which they were going to arrive.

04:04:57 20 Q. 200 against five basically?

21 A. Yes.

22 Q. There's not much that one can do, correct?

23 A. Yes, sir. That was in 2018. We had only five
24 security guards. And this was because we had already
04:05:17 25 made the transition from coffee to avocado. Before when

04:05:22 1 we had -- we had more than 12 security guards when it
2 was all coffee.

3 Q. Why were more security guards used at that
4 time?

04:05:35 5 A. Because the number of personnel was larger than
6 in the avocado project. In the coffee project or in the
7 coffee boom, during the harvest time more than 2,000
8 people would come to the farm, and that is why more
9 security guards would be hired.

04:05:54 10 Now, in making the change from coffee to
11 avocado, we had less personnel because we were just
12 beginning the project with 44.5 hectares of avocado, so
13 we weren't going to need so many security guards. Now,
14 for the next expansion --

04:06:17 15 Q. Mr. Gutiérrez, I don't want to be discourteous,
16 but you've gone on at some length in your answer, and
17 your lawyer will be able to allow you to elaborate if
18 you think it's appropriate, but I'd like to continue
19 with my questions. Is that okay with you?

04:06:34 20 A. Okay.

21 Q. Mr. Gutiérrez, in your first witness statement,
22 you have said that on the morning of 16 June 2018,
23 between 200 and 300 armed invaders invaded the upper
24 part of the Hacienda, correct?

04:06:53 25 A. Yes, that is correct.

04:06:54 1 Q. And at the time of the invasion, you have said
2 that there were only three security guards on duty,
3 correct?

4 A. That is right.

04:07:03 5 Q. Indeed, the head of security, Mr. Raymundo
6 Palacios, was not on the Hacienda at the time of the
7 invasion, right?

8 A. That's why he's not included because he had
9 two days of leave. Because every month the security
04:07:16 10 guards were given two days off.

11 Q. And nor were you at the Hacienda at the time of
12 the invasion, correct?

13 A. Yes, sir. The day before, on Friday, I had a
14 difficulty. I had to go look for a product for
04:07:35 15 avocados, and so I went to Jinotega on Friday.

16 Q. Mr. Gutiérrez, most of the information that you
17 included in your first statement on this first invasion
18 is the result of a phone call made by the head of
19 security, Mr. Palacios, who was not at Hacienda Santa Fé
04:07:53 20 at that time. Is that correct?

21 A. That is right.

22 Q. And the information that you received and that
23 was passed on to you by Mr. Palacios came from
24 Mr. Ferrufino?

04:08:06 25 A. Exactly.

04:08:09 1 Q. Mr. Gutiérrez, in your second statement you
2 provide more details on the origin of this information
3 that was passed on to you by telephone, correct?

4 A. That is right, sir.

04:08:23 5 Q. And you mentioned Efrain and Francisco
6 Chavarria, correct?

7 A. That is correct. They were the guards in the
8 upper part.

9 Q. And you say that they called you -- Efrain and
04:08:41 10 Francisco Chavarria called Mr. Domingo Ferrufino to
11 inform him that the invaders told them that they had
12 been sent by the government of Nicaragua, correct?

13 A. That's right.

14 Q. Nonetheless, in your witness statement and
04:09:05 15 despite the fact that you weren't at the Hacienda that
16 day, and not having spoken directly with any of the
17 invaders, you state in no uncertain terms that the
18 invaders said that they were affiliated with the
19 government of Nicaragua, using the term Sandinista
04:09:30 20 Government of Reconciliation and National Unity,
21 correct?

22 A. I met with them in the upper part on June 18th.

23 Q. That was two days after the first invasion,
24 correct?

04:09:41 25 A. Yes, exactly.

04:09:45 1 Q. Nonetheless, you state that before you met with
2 them -- and you say this in your second witness
3 statement --

4 A. Yes, because the sources of the information are
04:09:59 5 reliable sources from the security team at the Santa Fé
6 farm.

7 Q. And it was after receiving this call that you
8 contacted Captain Herrera to ask for the immediate
9 assistance of the police. Is that right?

04:10:16 10 A. Yes, it is.

11 Q. Mr. Gutiérrez, what did you expect the police
12 to do vis-à-vis a group of 200 to 300 invaders?

13 A. Out of respect for the fact that it is an
14 institution --

04:10:52 15 Q. Excuse me, I didn't hear your answer,
16 Mr. Gutiérrez. What did you expect the police to do
17 vis-à-vis a group of 200 to 300 invaders?

18 A. Since it is the institution that protects civil
19 society, I thought that they would take action under the
04:11:16 20 regulation defining them as the police force of
21 Nicaragua.

22 Q. Would you agree with me that one of the
23 obligations of the police is to protect human life,
24 correct?

04:11:26 25 A. That is right, sir.

04:11:29 1 Q. But only the lives of the workers at the
2 Hacienda Santa Fé?

3 A. Of everyone, sir.

04:11:54 4 Q. When you were told that this group of invaders
5 said that you had nothing to do anymore and that they
6 were now the owners of the Hacienda Santa Fé, did you
7 think that they were telling the truth?

8 A. That is right, sir.

9 Q. Why?

04:12:07 10 A. Because on seeing that the police did nothing
11 when I called Captain William Herrera, then I assumed
12 that what they were saying was true.

13 Q. Then you said that you received another call,
14 this time from Raymundo Palacios, who reported that
04:12:36 15 Inspector Calixto Vargas, of the police, was at the
16 Hacienda Santa Fé to confiscate the weapons of the
17 security guards. Is that right?

18 A. Yes, that is right. And that was on the 17th
19 of June at about 11 a.m.

04:12:58 20 Q. And is it your position that since the police
21 went to take the arms -- the weapons from the security
22 guards, that the police were supporting the invaders,
23 correct?

24 A. Yes, just as they came to take our weapons
04:13:12 25 because they were not going to confront that group of

04:13:17

1 invaders.

2

MR. ZUNIGA: Ricky, can we put up CWS-02,
paragraph 54, please?

3

4

Q. Mr. Gutiérrez, I'm going to show you on the
screen paragraph 54 of your first statement.

04:13:34

5

6

Mr. Gutiérrez, do you see paragraph 54
there of your first witness statement?

7

8

A. Yes, sir.

9

Q. The last two lines of that paragraph, there you
state that "At no time did the Jinotega police
department remove the invaders and paramilitaries from
Hacienda Santa Fé." Is that right?

04:14:17

10

11

12

13

A. Yes, sir.

14

Q. But that's not so, right?

04:14:29

15

A. Yes, sir.

16

Q. Where you say the police did not remove the
invaders from the Hacienda Santa Fé, is that false?

17

18

A. But on what date, sir?

19

Q. You don't make reference to any date. This is
a general statement where you say that the police did
not remove the invaders and paramilitaries from the
Hacienda Santa Fé?

04:14:52

20

21

22

23

A. That is right. That is based on the month of
June.

24

04:15:12

25

Q. But you do recognize that the police evicted

04:15:16 1 the invaders, correct?

2 A. Yes, sir, in 2021.

3 Q. But you recognize that the police evicted the
4 invaders for the first time in August of 2018, correct?

04:15:34 5 A. The one who gave the orders at that time at the
6 Hacienda was Antonio Rizo, known as Toño Loco, a
7 paramilitary who armed groups to fight civil society.

8 Q. And Toño Loco gave those orders after
9 Commissioner Castro and Mayor Leonidas Centeno went to
04:16:07 10 the Hacienda and gave them the order to leave, correct?

11 A. The police did not meet, nor did the mayor at
12 the Hacienda. They did so at another place. Only
13 Toño Loco went to the Hacienda. He was the one who gave
14 the eviction order.

04:16:38 15 Q. You've said that according to Jaime Vivas, the
16 invaders referred to the upper part of the Hacienda as
17 El Pavón, correct?

18 A. Yes, and the workers at the Santa Fé farm also
19 referred to it that way.

04:16:51 20 Q. And you've also said that these invaders
21 intended to form a cooperative called El Pavón?

22 A. Yes, that was their dilemma.

23 Q. And they formed a cooperative, correct?

24 A. No.

04:17:07 25 Q. They did not form a cooperative?

04:17:10 1 A. If you're talking to me about that year, the
2 answer is no.

3 Q. And what's the basis of your answer?

4 A. The 2018 invasion.

04:17:24 5 Q. So what you're saying is that these people
6 invaded the Hacienda in 2018 because they were not a
7 cooperative?

8 A. You're telling me did they form a cooperative
9 in that 2018 invasion. My answer is no.

04:17:39 10 Q. The cooperative was already formed, correct?

11 A. No, sir. I have no knowledge of that.

12 Q. You included a correction in your second
13 witness statement on this point, and in that correction
14 you say that the El Pavón cooperative was constituted,
04:18:06 15 correct?

16 MR. MULLINS: Could counsel please refer
17 the witness to the paragraph that was corrected?

18 MR. ZUNIGA: Certainly. Ricky, could you
19 please put up CWS-10, paragraph 9(s)? And the version
04:18:39 20 in English as well, please.

21 Q. Mr. Gutiérrez, do you see paragraph (s)?

22 A. Yes, sir.

23 Q. And just for the record, I'd like to indicate
24 that this is paragraph 9(s) of your second witness
04:19:13 25 statement. The paragraph says:

04:19:21 1 "When I prepared my first witness
2 statement, I was unaware that El Pavón Cooperative was
3 incorporated. I understand from reading the materials
4 in this arbitration that El Pavón Cooperative was
04:19:35 5 incorporated."

6 Does this help refresh your memory?

7 A. Yes, sir.

8 To clarify, there were board of directors
9 documents of the supposed cooperative, but I did not
04:19:58 10 inquire whether it was so, and this cooperative -- well,
11 I have a brother who works in the cooperative movement,
12 and we reviewed it, and that cooperative was actually
13 not constituted. There is a Ministry of Family Economy
14 in Nicaragua which follows up on cooperatives and which
04:20:27 15 has records going back to 2001. And I've reviewed them,
16 and that cooperative does not appear there. There is an
17 El Pavón cooperative that appears, but it is a transport
18 cooperative, and it's based in a different department.

19 Q. Mr. Gutiérrez, none of what you just clarified
04:20:46 20 is in either of your two witness statements. Is that
21 right?

22 A. Yes, sir.

23 Q. It's not in either of your statements, correct?

24 A. Yes. I'm just clarifying that there was a
04:20:58 25 cooperative for I referred to a letter that the supposed

04:21:07 1 directors of the cooperative had.

2 Q. We're going to change topic.

3 A. That's fine.

4 Q. According to your second statement, when you
04:21:27 5 called Captain Herrera in the days prior to the first
6 invasion, there were no indicia that the Hacienda
7 Santa Fé was going to be targeted by an occupation,
8 correct?

9 A. Could you please restate your question?

04:21:40 10 Q. Of course. But first --

11 MR. ZUNIGA: Ricky, could you please put
12 up CWS-10, paragraph 64? The same document.

13 Q. The question was, according to your second
14 statement, which is the document we have up on the
04:21:58 15 screen, when you called Captain Herrera in the days
16 leading up to the invasion, there were no indicia that
17 the Hacienda Santa Fé was going to be targeted by an
18 occupation?

19 A. In the days prior -- well, one day before,
04:22:22 20 June 15th, they met. That's when I sent Jaime, and that
21 is where we saw that it was evident that they were going
22 to occupy the Santa Fé farm.

23 Q. So it was evident that they were going to
24 occupy the Santa Fé farm, right?

04:22:38 25 A. Yes, that's right.

04:22:41 1 Q. So what you said at paragraph 64 of your second
2 statement is false, correct? And you refer specifically
3 in the second to last sentence in that same paragraph
4 where it says:

04:23:12 5 "At that time, there was no indication
6 that Hacienda Santa Fé would be a target for
7 occupation."

8 A. Sir, if you read at the beginning, it says in
9 the days prior to the invasion I called the captain, and
04:23:26 10 this is a reference to the day before, when they
11 gathered to invade on June 16th.

12 Q. And you indicate that you already had
13 information that these people were going to go onto the
14 Hacienda, correct?

04:23:43 15 A. Well, at that time -- when I say there was no
16 indication, I am referring to days prior to June 15.
17 For example, 10th and 11th of June, at that time we did
18 not have any indicia.

19 Q. I'm referring to the first line in this
04:24:01 20 paragraph where you say "in the days prior to the
21 invasion on June 16, 2018 ..." It doesn't say June 10th
22 or June 9th. It says June 16, correct?

23 A. Yes, sir. But it says "in the days prior to."
24 The thing is I put it in terms, but it was actually the
04:24:30 25 day before the invasion.

04:24:31 1 Q. So what you have said in this paragraph 64 is
2 not exact. Is that right?

3 A. That is right, sir.

04:24:52 4 Q. In your second statement, you indicate that, on
5 June 18, 2018, you met with Commander Gorgojo and
6 another leader known as El Pistolero, correct?

7 A. That is right. Efren Zeledón Orozco and
8 Ciro Montenegro, Avispa, were also there.

04:25:33 9 PRESIDENT: Mr. Zuniga, if we can break in
10 the next few minutes when there is a convenient time in
11 your examination.

12 MR. ZUNIGA: Just a couple more minutes,
13 and then we can take a break, Mr President.

04:25:41 14 PRESIDENT: That's fine. I'm simply
15 flagging that it would be good to have a break at around
16 4:30.

17 MR. ZUNIGA: Thank you.

04:25:58 18 Q. Mr. Gutiérrez, we have up on the screen
19 paragraphs 84 and 85 of your second statement. Do you
20 see it?

21 A. Yes, sir.

22 Q. And there, as mentioned, you spoke of the
23 meeting that you had with Commander Gorgojo and
24 El Pistolero, right?

04:26:15 25 A. Yes, that's right.

04:26:17 1 Q. Nonetheless, you don't make any reference to
2 this meeting in your first statement, correct?

3 A. Yes. Yes, I think so, sir.

04:26:42 4 Q. And, actually, the reason you changed the
5 narrative and speak of this direct meeting that you had
6 with Gorgojo and El Pistolero was in response to the
7 Counter-Memorial by Nicaragua where we put into evidence
8 that most of your statement is based on hearsay
9 testimony, correct?

04:27:13 10 A. Hearsay testimony of whom? What do you mean to
11 say about that, sir?

12 Q. What I'm referring to is that what you narrate
13 in your first witness statement is not something that
14 you personally experienced or witnessed but, rather,
04:27:27 15 something that happened that was recounted to you, that
16 someone told you, right?

17 A. Yes.

18 MR. ZUNIGA: Mr. President, this would be
19 a good time to take a break.

04:27:46 20 PRESIDENT: Very good. Let's break for 15
21 minutes. Mr. Gutiérrez, if you could listen, I should
22 remind you that you cannot speak with anybody about your
23 testimony during the break in the next 15 minutes. You
24 can leave the room. You can have a cup of coffee, but
04:28:02 25 please don't speak about your evidence.

04:28:08 1 MR. GUTIERREZ: Understood, Mr. President.
2 (Brief Recess)
3 PRESIDENT: Let's go on. Mr. Zuniga.
4 MR. ZUNIGA: Thank you, Mr. President.

04:47:32 5 BY MR. ZUNIGA:
6 Q. Mr. Gutiérrez, let us talk about the second
7 invasion. Is that okay?
8 A. That's okay.
9 Q. The second invasion took place on 16 July 2018,
04:47:42 10 correct?
11 A. Correct.
12 Q. 30 days after the first one, right?
13 A. That's exactly right.
14 Q. And you maintain in your first statement that
04:47:56 15 on that date, 60 armed invaders occupied lower Santa Fé,
16 correct?
17 A. That's correct.
18 Q. Just for the record to be clear, up until that
19 time the invaders were only found in the upper Santa Fé
04:48:16 20 area?
21 A. Before 16 July in the second invasion, they
22 were in the upper Santa Fé area.
23 Q. Where were you when the second invasion took
24 place?
04:48:31 25 A. I was at home in Jinotega.

04:48:36 1 Q. The head of security, Raymundo Palacios, where
2 was he during the second invasion?

3 A. He was off, actually. He had a two-day off
4 period.

04:48:52 5 Q. Again, did you receive the information by
6 telephone?

7 A. That's exactly right.

8 Q. And you decided to go to the Hacienda?

9 A. That's right.

04:49:07 10 Q. You indicated that you feared for your life?

11 A. That's right.

12 Q. However, you went to the Hacienda?

13 A. That's exactly right.

14 Q. What made it so that you have changed your
04:49:26 15 mind?

16 A. The fact that I was afraid. It's not that I
17 couldn't get to the Hacienda. I was at the Hacienda but
18 always taking care of things and being careful, and I
19 was afraid.

04:49:39 20 Q. During your visit, were you threatened to be
21 killed?

22 A. Back then, no.

23 Q. What did you do during that visit?

24 A. I went to the Hacienda that day. When I
04:50:02 25 arrived, I spoke to them. I told them that I was the

04:50:08 1 agronomist and we met on the street, the public area,
2 right across from the Casa Hacienda and all the invaders
3 were around me. They were all armed, and Benicio Garcia
4 was there, Efren Zeledon Orozco was there, Ciro Manuel
04:50:37 5 Montenegro was there, Cristobal Luque was there, amongst
6 the other invaders.

7 On that date --

8 Q. Sir, excuse me. I don't want to be mean to
9 you, but I'm going to ask you another question.

04:50:55 10 A. Well, you asked me whether I met with them.

11 Q. I just wanted to confirm something you said.
12 You said you met with them in the public area, that is
13 to say on the roadway?

14 A. Sir, the Casa Hacienda is here, and the roadway
04:51:16 15 is right in front of where the desk is. They were
16 looking for an open space to address me and the security
17 guards.

18 Q. I understand. Just to confirm, and just to be
19 clear, you were saying that right across from the Casa
04:51:32 20 Hacienda there's a public road, right?

21 A. Yes.

22 Q. Thank you. In your first statement you say
23 that Jaime Vivas told you that Benicio Garcia,
24 Comandante Gorgojo, told him that you and Mr. Rondón
04:51:56 25 were dead men?

04:51:59 1 A. That's right.

2 Q. You stated that when you were there at the
3 Hacienda, nobody threatened you, correct?

4 A. That's right.

04:52:16 5 Q. There was a third invasion. Is that not right?

6 A. That's exactly right.

7 Q. During this third invasion -- well, it happened
8 on 24 July 2018. Is that right?

9 A. That's exactly right.

04:52:30 10 Q. According to your first statement, on
11 25 July -- on 24 July 2018, Toño Loco entered the
12 Hacienda with three cars and 40 heavily armed men,
13 correct?

14 A. Correct.

04:52:51 15 Q. And you maintain that you called Mr. Rondón to
16 let him know what was going on and that Mr. Rondón told
17 you to leave the Hacienda because he was concerned about
18 your personal security. Is that right?

19 A. That's right.

04:53:10 20 Q. Did anyone tell you personally that they were
21 occupying the Hacienda on the orders of the government
22 of Nicaragua?

23 A. Yes, sir.

24 Q. Would you be surprised if I tell you that there
04:53:30 25 is no reference in your first statement where you say

04:53:33 1 that you held a conversation with a paramilitary or with
2 an occupant and that that individual told you that he
3 was occupying the Hacienda on orders of the government
4 of Nicaragua?

04:53:43 5 A. I wouldn't be surprised.

6 Q. Why not?

7 A. Because they said that the government was the
8 one who sent them and who gave those lands to them.

9 Q. I don't think you understood my question. Let
04:53:58 10 me rephrase it.

11 A. Okay.

12 Q. In your first witness statement, you do not
13 make any reference whatsoever to the fact that one of
14 these invaders or paramilitaries, as you call them, told
04:54:14 15 you personally, and not through another person, that
16 they were invading the Hacienda on the orders of the
17 government of Nicaragua?

18 A. I told you this before. On 18 July, during the
19 first invasion, they told me that when they were in
04:54:35 20 upper Santa Fé.

21 Q. You have recognized that on 11 August 2018, the
22 police evicted the invaders, right?

23 A. The police gave the order, but they didn't go
24 to the Hacienda. Toño Loco went to the Hacienda.

04:55:05 25 MR. ZUNIGA: Ricky, could we put up

04:55:08 1 CWS-02, paragraph 106, please?

2 Q. Mr. Gutiérrez, I'm going to show you a
3 paragraph of your first witness statement. It is
4 paragraph 106.

04:55:30 5 You see on the left the document in one
6 language and on the right the document in another
7 language. I'm going to read it.

8 "On August 11, 2018, Jaime Vivas called me
9 and told me that Leónidas Centeno, the Mayor, and the
04:55:54 10 Police Commissioner ordered Luis Antonio Rizo, 'Toño
11 Loco', to tell the invaders to leave the Hacienda
12 Santa Fé."

13 Did I read that correctly?

14 A. You read it correctly.

04:56:05 15 Q. Again, just to confirm, this is paragraph 106
16 of your first witness statement, correct?

17 A. That is correct.

18 Q. The police ordered the invaders to leave the
19 Hacienda, correct?

04:56:26 20 A. Well, the order was given directly to Toño Loco
21 for him to obey that order.

22 Q. After the invaders left Hacienda Santa Fé, the
23 police told the security team at the Hacienda that the
24 managers of the Hacienda could come back to it, correct?

04:56:59 25 A. Yes.

04:56:59 1 MR. ZUNIGA: Ricky, if you could please go
2 to paragraph 109 of the same document.

3 Q. We're going to show you the corresponding
4 paragraph, paragraph 109 of your first statement.

04:57:20 5 Paragraph 109 says:

6 "Raymundo Palacios told me that he
7 received a call from Police Captain William Herrera, who
8 informed him that the management team could return to
9 the Hacienda Santa Fé because the invaders and
04:57:35 10 paramilitaries had left."

11 Did I read that correctly?

12 A. You did, sir.

13 Q. Mr. Gutiérrez, you went back to the Hacienda
14 Santa Fé on 14 August to take possession of the Hacienda
04:57:53 15 and to do an inventory of the damage and the objects
16 that had been taken, right?

17 A. I only went back to do an inventory of the
18 things taken, not to take possession of the Hacienda.

19 MR. ZUNIGA: Ricky, could you please put
04:58:08 20 up Exhibit C-58, please? Ricky, could you also split
21 the screen and put up R-148?

22 Q. Mr. Gutiérrez, do you recognize this document?
23 I am making reference to the one on the left in Spanish.

24 A. I do, sir. This is a notarized document by
04:59:01 25 Mr. Rivera Monzón.

04:59:03 1 Q. It's a notarial document. Is that right?

2 A. Yes, that's right.

3 Q. Just to be clear on the record, I'm going to
4 explain to you that the copy on the right is a

04:59:13 5 translation of this notarial document. Please focus on
6 the document on the left.

7 A. Okay.

8 Q. You said that you went back to the Hacienda to
9 prepare this document, which is an inventory of the

04:59:37 10 things that were taken from the Hacienda?

11 A. Yes, that's right, on the orders of Mr. Carlos
12 Rondón.

13 Q. And we can look here that Mr. William Herrera
14 was present there as well, correct?

05:00:09 15 A. Correct.

16 Q. And -- well, rather halfway on this page -- I
17 am going to read starting at line 13 of this document.
18 This is the document that was prepared by the notary
19 public, correct?

05:00:41 20 Line 13 reads:

21 "I appeared at Hacienda Santa Fé in order
22 to take an inventory of damaged, missing and stolen
23 assets as a result of the actions of a group of people
24 from various locations who, from Saturday, June 16 to
05:01:03 25 Monday, August 13th of this year, a group of 550 people

05:01:12 1 violently invaded and trespassed on Hacienda Santa Fé,
2 which they later vacated as a result of the pressure
3 exerted by the Jinotega Department of National Police."

4 A. Where does it refer to the pressure of the
05:01:35 5 police?

6 Q. That is line 18, after the first comma, which
7 was -- "which they later vacated as a result of the
8 pressure exerted by the Jinotega Department of National
9 Police."

05:01:55 10 You signed this document, didn't you?

11 A. Yes, I did.

12 Q. Now we move on to the last page.

13 MR. ZUNIGA: Just go up. The last
14 paragraph before the signature block, please. Line 11.

05:02:09 15 There we go. Thank you.

16 Q. Line 11, last paragraph of that document reads:

17 "Therefore, we concluded the operations as
18 practiced at 4 p.m. on Tuesday, the 14th, 2018. Having
19 read this document, we signed it and also attached the
05:02:44 20 administrator's report."

21 I am asking you whether you recognize the
22 signature you see to the right of the page?

23 A. Yes, sir. To the right is my signature. Then
24 you have the signature of Captain William, and then on
05:03:05 25 top of that you have the signature of Mr. Rivera Monzón.

05:03:20

1 Q. So the police did evict the invaders?

2

A. Well, they met with Toño Loco, and it was
3 Toño Loco the one that actually evicted the individuals.

4

05:03:42

Q. Mr. Gutiérrez, since you have recognized in
5 this document the Hacienda was free of invaders, didn't
6 you think it was a good moment to strengthen security
7 and avoid the return of the invaders?

8

A. We were awaiting inspection by the police
9 forces for them to verify and support us to make sure
10 whether there were no other invaders.

05:04:00

11

Q. Is Captain William Herrera a captain with the
12 police forces?

13

A. Yes.

14

05:04:13

Q. And he signed this document together with you,
15 correct?

16

A. Yes.

17

Q. So he was recognizing that the Hacienda was
18 free of invaders?

19

05:04:25

A. But he only provided support as to the lower
20 part where the inventory of the damages was taken. He
21 did not go to the upper part or to the forest to verify
22 if there were any additional invaders.

23

Q. What you just said cannot be found anywhere in
24 this document, correct?

05:04:48

25

A. Correct. It's not there because I am referring

05:04:52 1 to the Hacienda Santa Fé house, and that is in the lower
2 part.

3 Q. And according to your statement, on August 17,
4 2018, about 50 invaders recovered Hacienda Santa Fé,
05:05:18 5 correct?

6 A. Yes.

7 Q. And another 100 individuals entered on
8 August 18th?

9 A. Correct.

05:05:31 10 Q. Where were you when those invasions took place?

11 A. On August 17th I was at the Hacienda, and I
12 left at about 3 p.m. and I told Domingo and Raymundo to
13 stay there and if there was any situation, they could
14 give me a call.

05:05:50 15 So the invaders arrived at about 5 p.m.
16 They couldn't let me know on that day because we had
17 interference of the signal. So this was a mountain
18 area, and we had poor signal.

19 Q. Just to confirm that I properly understood, so
05:06:08 20 only two guards were protecting the Hacienda, correct?

21 A. Yes. Two in the lower part and two in the
22 upper part. I am referring to the lower part right now.

23 Q. So if there were guards in the upper part, it
24 was because it was vacated?

05:06:31 25 A. Sir, they remained there. They were guarding

05:06:35 1 the area because it was not -- they were not going to be
2 able to stop them if the invaders went back. They were
3 just there to relay information to us.

4 Q. Were you -- did you or anyone ask the invaders
05:06:56 5 if the Mayor Centeno supported them?

6 A. Invaders said that they had been promised those
7 lands in exchange for support of the demonstrations
8 against the government. So they were told that Santa Fé
9 was going to be theirs.

05:07:18 10 Q. That was not my question. My question was
11 whether you personally asked any of the invaders at any
12 time whether Mayor Leónidas Centeno supported them?

13 A. Clearly, I was not going to ask them directly,
14 but they did mention him.

05:07:42 15 Q. But they never mentioned that to you?

16 A. Raymundo Palacios overheard that. So as well
17 as -- as well as Jaime, he also overheard that. Jaime
18 Vivas.

19 Q. So we can say here that this is just hearsay
05:08:10 20 and reports from the employees of Hacienda Santa Fé.
21 That is the main and only source of your information?

22 A. Yes, it's the information from the guards that
23 are people that we hired to take proper care and also
24 because we hired them because we trusted them and also
05:08:27 25 my own person when I was there. These are their --

05:08:30 1 these are two statements.

2 Q. As you have just stated, or you stated before,
3 you never endeavored to ratify that information by
4 asking the invaders directly?

05:08:46 5 A. Had I asked them directly, they would have shot
6 me.

7 Q. And that is basically the reason, that is that
8 you did not confirm the validity of the alleged
9 information -- sir, let me finish, please. Let me

05:09:09 10 restart.

11 That lack of information, firsthand
12 information, led you to include some fake assertions in
13 your witness statements before the Tribunal?

14 A. They are not false information.

05:09:28 15 MR. ZUNIGA: Ricky, could we please go to
16 CWS-02, paragraph 128?

17 Q. I will show you paragraph 128, rather, of your
18 first witness statement.

19 As you have stated, this first witness
05:10:12 20 statement is dated October 5, 2022, correct?

21 A. Correct.

22 Q. At paragraph 128, you state:

23 "Since I left Nicaragua, I have remained
24 in communication with people who worked with me at
05:10:29 25 Hacienda Santa Fé. They keep me informed on

05:10:33 1 developments. I understand from them that:

2 (a) The armed invaders are still in
3 possession of Hacienda Santa Fé."

4 Mr. Gutiérrez, you have asserted that the
05:11:00 5 police evicted the invaders in August 2021, correct?

6 A. Toño Loco was ordered to leave.

7 Q. And invaders were no longer at the Hacienda,
8 correct?

9 A. We did not reach out to the mountain area, but
05:11:17 10 we only contacted the part that had to do with
11 facilities, with infrastructure.

12 Q. Are you referring to the first eviction in
13 August 2018?

14 A. Let me correct. Here I am referring to the
05:11:42 15 moment I left Nicaragua. Yes, yes. That's the way it
16 is.

17 Q. Earlier today, when Claimant's counsel asked
18 you some questions, you mentioned that in August 2021,
19 all of the invaders had left. Do you recall that?

05:12:11 20 A. August?

21 Q. Yes, August 2021. What was your answer?

22 A. This narrative --

23 Q. Mr. Gutiérrez, for the clarity of the record,
24 you stated today when Claimant's attorney was asking you
05:12:35 25 questions, that in August 2021, the invaders had left?

05:12:41 1 A. That's correct.

2 Q. Thank you.

3 So this information that you included at
4 paragraph 128 is false?

05:12:52 5 A. Why?

6 Q. Why is it false?

7 A. Yes. Why are you telling me it is false?

8 Q. Because, as you indicated, this statement is of
9 October 2022, almost 14 months after August 2021, and

05:13:11 10 you stated -- let me conclude -- you stated in your
11 direct examination that by August 2021, everyone had
12 left. Is that correct?

13 A. August 2021, yes, that is correct.

14 Q. Did you ever inspect the upper part of the
05:13:42 15 Hacienda?

16 A. Yes.

17 MR. ZUNIGA: Ricky, in the Spanish
18 version, can you go to the next page, please? I want to
19 see letter (d), please.

05:13:58 20 Q. This same paragraph of your first statement,
21 letter or subparagraph (d) states:

22 "There has been widespread destruction of
23 the forests by cutting down the best woods, extracting
24 them for the benefit of the invaders and being organized
05:14:30 25 by the Nicaraguan government."

05:14:35 1 A. That is correct.

2 Q. What objective evidence did you have that the
3 Nicaraguan government was encouraging the exploitation
4 of the forestry resources?

05:14:54 5 A. They were never controlled by the agencies in
6 Nicaragua such as MARENA and INAFOR.

7 MR. ZUNIGA: Ricky, could you please go
8 back to the page? Would you please go up to letter (f)?

9 Q. We continue with the same paragraph,
05:15:17 10 subparagraph (f) says:

11 "Lands at Hacienda Santa Fé have been
12 redistributed to the invaders."

13 But that is impossible, isn't it?

14 A. Why?

05:15:31 15 Q. Because the invaders had already left, as you
16 already recognized today.

17 A. The Santa Fé lands were redistributed, and this
18 is referring to the time when they were taken again on
19 August 17th.

05:15:54 20 Q. This is a statement of October 2022?

21 A. Correct.

22 Q. And here you're not indicating or including any
23 information indicating that after the invasion of
24 August 2018, the lands were redistributed?

05:16:10 25 A. Correct, because this is narrating the first

05:16:13 1 invasion.

2 Q. The subparagraph that I just read to you does
3 not include any specific observation as to the moment
4 you are referring to when you're saying that the lands
05:16:28 5 were redistributed, correct?

6 A. Yes, sir.

7 Q. It is a general statement?

8 A. It is a general statement of the narrative
9 until the moment they were evicted.

05:16:59 10 MR. ZUNIGA: Ricky, can we please go back
11 to C-58 and R-148?

12 Q. Mr. Gutiérrez, I will now take you back to the
13 notary public's document inventorying the damages caused
14 to the Hacienda Santa Fé.

05:17:43 15 If you look at this, at the bottom of the
16 document it says: 1. The objects that were taken. And
17 there we see a list of the objects: four tires, seven
18 batteries, one quadricycle. Do you see all that?

19 A. Yes, I do see that.

05:18:16 20 Q. And if we continue with this, No.2, two
21 laptops. Do you see that?

22 A. Yes.

23 Q. Those are the computers where all of the
24 corporate information for INAGROSA was stored, correct?

05:18:36 25 A. Correct.

05:18:40 1 Q. Now we are going to look at the subparagraph
2 halfway down the paragraph, and this is the inventory
3 for machinery and materials, line 21. And this is a
4 record of the stuff left behind by the invaders?

05:19:14 5 A. No. The stuff that they took away with them.

6 Q. No. This is what they left behind.

7 A. Yes, that was still there at that point in
8 time.

9 Q. For the clarity of the record, we would agree
05:19:28 10 that this is a list showing whatever was in the
11 Hacienda?

12 A. That is correct.

13 Q. And here it refers to a Kodiak truck, a blue
14 motorcycle, chemicals.

05:19:52 15 MR. ZUNIGA: Can we go to the next page,
16 Ricky, please?

17 Q. At line 5, you will see other items. And if we
18 look at line 8 --

19 A. Would you allow me?

05:20:17 20 Q. Yes.

21 A. There I am referring to other items. These are
22 items at the Hacienda. It doesn't mean that they were
23 there. They took them with them.

24 Q. And if they took them, why isn't that in the
05:20:37 25 portion of the document referring to the items that they

05:20:40 1 took?

2 A. Sir, Mr. Rivera Monzón drafted this notarial
3 document and he decided not to organize it that way.

4 Q. But you signed it?

05:20:59 5 A. Yes, I did sign it, and based on my
6 understanding and the specific inventory, everything had
7 already been taken by the invaders.

8 Q. In other words, today, 2024 July, you are
9 correcting this document that you signed in 2018?

05:21:25 10 A. No, sir. That is the way you interpret it.

11 Q. I'm reading the words.

12 A. Yes. It says "Other Items." Other items that
13 used to be there. I guess Mr. Rivera Monzón should have
14 specified. These are belongings that they did not take.

05:21:51 15 It doesn't say that.

16 MR. ZUNIGA: Ricky, could you please
17 highlight line No. 8?

18 Q. We are highlighting line 8 in this document,
19 and you will see that there it reads:

05:22:09 20 "Ten coffee sacks, one desktop computer."

21 A. That is correct.

22 Q. And you assert that those laptop computers that
23 they did take are the computers that had all of the
24 Hacienda information, correct?

05:22:25 25 A. Correct. I am referring to the one that I had

05:22:28 1 in my office.

2 Q. And there you did not have any information?

3 A. There was nothing left because they took
4 everything. Before that they said that those belongings
05:22:41 5 were going to be given to the police and that we were
6 unable to remove anything from there.

7 Q. And you just stated that after the eviction in
8 August 2018, and following Mr. Rondón's orders, you told
9 Raymundo Palacios and Domingo Ferrufino to guard the
05:23:13 10 Hacienda?

11 A. After August 2018?

12 Q. Yes, after August 2018.

13 A. It was not for them to guard but for them to
14 act as if they were occupants, because they told us,
05:23:30 15 okay, either you leave or you stay and we are going to
16 give you something. So why don't you guy -- why don't
17 you go, tell them that that's what you're going to do
18 and see if you can obtain some information.

19 So we have to obtain the information,
05:23:48 20 whether it was the government or not, and we did ratify
21 that it was with the support of the government.

22 Q. You just stated that you didn't tell them to
23 stay. Rather, to infiltrate with the occupants?

24 A. I told them go to the Hacienda, and if you're
05:24:12 25 asked, tell them that I sent you there to remain at the

05:24:16 1 Hacienda. But if they ask you why you are going to
2 remain at the Hacienda, you tell them because, for
3 example, you have not been totally paid. But the idea
4 was for them to infiltrate and to gather information.

05:24:32 5 MR. ZUNIGA: Ricky, could you please go to
6 CWS-02, paragraph 116?

7 Q. Mr. Gutiérrez, I am going to show you
8 paragraph 116 of your first witness statement.

9 Mr. Gutiérrez, can you see paragraph 116
05:25:29 10 of your first witness statement?

11 A. Yes.

12 Q. And that paragraph reads:

13 "Under the orders of Carlos Rondón, I told
14 Raymundo Palacios and Domingo Ferrufino to stay and
05:25:44 15 guard Hacienda Santa Fé. I went to Hacienda Santa Fé
16 during the day but left at night."

17 Correct?

18 A. That is correct. That is before they went back
19 on August 17th.

05:26:18 20 Q. Now we are going to look into the eviction of
21 August 2021. As we have already stated, you also
22 recognize that the government of Nicaragua evicted the
23 Hacienda occupants on August 13, 2021?

24 A. That is correct.

05:26:40 25 Q. And based on your statement, currently six

05:26:45 1 armed guards are guarding Hacienda Santa Fé, correct?

2 A. Yes.

3 MR. ZUNIGA: Could we please put up
4 CWS-02, paragraph 147?

05:27:03 5 Q. So I am going to show you paragraph 147 of your
6 first witness statement.

7 As we have done before, we are going to
8 show you the document in Spanish to the left of the
9 monitor. And based on your statement:

05:28:03 10 "Currently the Hacienda Santa Fé is
11 guarded by 6 armed men. The guards say that they were
12 hired by a contractor company, but I believe that it is
13 the government the one that is paying them."

14 Did I read it right?

05:28:19 15 A. Yes, you read it right.

16 Q. In other words, you do not believe the guards,
17 correct?

18 A. No, sir, because they are not guards of Finca
19 Santa Fé.

05:28:32 20 Q. In other words, you believe that the guards are
21 lying to you, correct?

22 A. Sir, I did not have any communication with
23 those guards.

24 Q. And if you did not have any communication, how
05:28:50 25 do you know that the guards are saying that they were

05:28:52 1 hired by a contractor company?

2 A. There are several workers that live around
3 Hacienda Santa Fé. There is a family by the name
4 González, and they go through that area.

05:29:09 5 Q. In other words, other people, once again, gave
6 you information that you did not verify firsthand?

7 A. If you allow me, I can explain to you why those
8 six guards are there.

9 Q. I want you to answer my question. Let me
05:29:27 10 reiterate it.

11 A. Please do.

12 Q. Once again, you are making a statement based on
13 information given to you by others, correct?

14 A. That is correct, and those are the individuals
05:29:48 15 that are still guarding it.

16 Q. And that information provided to you by third
17 parties, that information is some information that you
18 do not trust?

19 A. I do not think that it is a separate company.

05:30:03 20 Q. In other words, you believe that these people,
21 those guards, are lying when they say that they were
22 hired by a contractor's company, correct?

23 A. Yes.

24 Q. Thank you. You already answered.

05:30:21 25 And that's fine because sometimes people

05:30:23 1 do lie, right?

2 A. On occasion. On serious things like that,
3 though, no.

4 Q. They only lie with respect to things that are
05:30:37 5 not serious?

6 A. Sir --

7 THE REPORTER: Are you hearing the
8 English?

9 MR. ZUNIGA: Yeah, I got carried away.
05:31:00 10 Let me do that again.

11 Q. I asked you if you'd agree with me when I say
12 that people sometimes lie?

13 A. That's right.

14 Q. Thank you.

05:31:14 15 Mr. Gutiérrez, you have said that on
16 16 June 2018, you met with Favio Dario Enriquez?

17 A. On the 16th of July. July.

18 Q. That's a correction you made this morning. Is
19 that right?

05:31:36 20 A. No, sir.

21 MR. ZUNIGA: Ricky, could we please put up
22 CWS-02, paragraph 84?

23 I'm sorry. 82.

24 Q. This is paragraph 82 of your first witness
05:32:27 25 statement.

05:32:29 1 A. That's right.

2 Q. And in this paragraph you say that:

3 "On July 16, 2018, after the invaders and
4 paramilitaries completely occupied the Hacienda

05:32:41 5 Santa Fé, I took my motorcycle and left Hacienda

6 Santa Fé. As I was making my way through the nearby
7 town, I encountered a Nicaraguan government official,

8 Enrique Fabio Dario, at one of the barricades. I

9 stopped to talk with him, and I told him that the

05:33:07 10 Hacienda was completely invaded. He told me that the

11 government of Nicaragua was taking the Hacienda Santa Fé
12 to put pressure on the business sector."

13 Correct?

14 A. That is correct.

05:33:29 15 Q. Just for clarity of the record, when you make

16 reference in this paragraph to the barricades, you are
17 referring to what are also called los tranques?

18 A. Yes, that's right.

05:33:43 19 Q. And your testimony is that during that

20 encounter, Mr. Enriquez told you that Nicaragua was
21 taking the Hacienda to pressure the business sector?

22 A. Exactly.

23 MR. ZUNIGA: Could we go to paragraph to
24 CWS-10, paragraph 109?

05:34:13 25 Q. I'm going to show you paragraph 109 now of your

05:34:16 1 second witness statement.

2 Mr. Gutiérrez, this is paragraph 109 of
3 your second witness statement. In this paragraph you
4 refer once again to that encounter with engineer

05:35:24 5 Enriquez?

6 A. That's right.

7 Q. Nonetheless, now this time you change your
8 story?

9 A. Where do I change it?

05:35:34 10 Q. I'll tell you in just a second.

11 A. Yes, please tell me.

12 Q. In this paragraph you state that, according to
13 Mr. Enrique Fabio Dario -- who is actually engineer
14 Enriquez.

05:35:59 15 A. Yes.

16 Q. That Mr. Enriquez told you that the government
17 intended to adopt a more stringent approach towards
18 business entities that did not show support for the
19 government's policies with a particular emphasis on
20 targeting foreign-owned enterprises. And you add:

21 "Specifically, Mr. Dario mentioned that
22 the government was expropriating Hacienda Santa Fé's
23 lands for redistribution."

24 Correct?

05:36:39 25 A. That is correct. You are saying that I changed

05:36:45 1 the date? What was that?

2 Q. No, I didn't tell you that you changed the
3 date. I just read out what paragraph 109 said.

4 A. But first you said I had changed a date.

05:36:56 5 Q. Mr. Enriquez, did I read paragraph 109 of your
6 second statement correctly?

7 A. Yes, sir.

8 Q. And just for clarity of the record, you made a
9 mistake when you referred to this employee of the
05:37:15 10 Ministry of Agriculture and Forestry, who you called
11 Mr. Enrique Fabio Dario. In actuality, he is engineer
12 Favio Dario Enriquez, correct?

13 A. In the name, yes, I was mistaken because that
14 year, I only knew him as Fabio.

05:37:44 15 Q. But what you say here at paragraph 109 of your
16 second statement is not the same as what you said in
17 your first statement. Isn't that so?

18 A. But it's understood that it's the same thing.
19 Because in both, I say that he told me that the
05:38:07 20 government was confiscating it to distribute it to the
21 invaders for them to provide support at the barricades
22 against civil society.

23 Q. In this second statement, you speak
24 specifically -- or you say specifically that the intent
05:38:29 25 of the government was to adopt a more stringent approach

05:38:35 1 towards business entities that did not show support for
2 the government's policies but, in addition, that were
3 foreign-owned, correct?

4 A. That is correct.

05:38:46 5 Q. This is something you didn't say in your first
6 statement?

7 A. No, sir. But I ratified it in the second one.

8 Q. Mr. Gutiérrez, beyond your own words, do you
9 have any objective contemporaneous evidence that
05:39:06 10 supports this assertion?

11 A. That the government was pressuring private
12 businesses, and mainly foreign ones? No.

13 Q. That Mr. Enriquez told you this, which you
14 state in paragraph 109?

05:39:29 15 A. He didn't give it to me in written form at that
16 barricade. It came from his own mouth.

17 Q. You don't have a text message?

18 A. No, sir, because he told me directly
19 face-to-face.

05:39:46 20 Q. And if I understood well earlier, when
21 Claimant's attorney was putting questions to you, you
22 said that Enriquez and other government employees were
23 arming the barricade, correct?

24 A. That's right.

05:40:21 25 Q. You did not include that information in your

05:40:23 1 first or second statement, correct?

2 A. That's right.

3 MR. ZUNIGA: Mr. President, briefly, how
4 much longer do I have?

05:40:47 5 PRESIDENT: We could go on until 6:00.
6 Around 6:00. We started with Mr. Gutiérrez an hour
7 earlier than planned, if that is a convenient time. I
8 expect you will not be able to finish by 6:00.

9 MR. ZUNIGA: No.

05:41:07 10 PRESIDENT: If we go on until quarter past
11 6, you won't be able to finish?

12 MR. ZUNIGA: I'm afraid not.

13 PRESIDENT: So then we better go on until
14 6:00, unless my colleagues have an issue with that.

05:41:19 15 MR. ZUNIGA: Got it. Thank you.

16 PRESIDENT: We should discuss now, or
17 after you have completed today's examination, the
18 program for tomorrow. But for the time being, would you
19 be able to assess or estimate how long you would still
05:41:47 20 need after 6:00 with Mr. Gutiérrez?

21 MR. ZUNIGA: Probably around an hour and a
22 half.

23 MS. GREENWOOD: An hour and a half from
24 now?

05:42:02 25 MR. ZUNIGA: Yes. I still have an hour

05:42:04 1 and a half to go, roughly.

2 PRESIDENT: From now?

3 MR. ZUNIGA: Yes.

4 PRESIDENT: Or from 6. That's fine.

05:42:12 5 Let's discuss, then, at the end of the day
6 the program for tomorrow. We may want to consider
7 starting with Ms. Gutiérrez already tomorrow, because
8 I'm afraid otherwise Friday may be a busy day with three
9 witnesses, but tomorrow we would have potentially a
05:42:31 10 lighter day. But let's discuss that once you have
11 completed. Please go on.

12 MR. APPLETON: Excuse me, Mr. President.
13 I'm just a little confused. So the suggestion is that
14 we'll take a shorter sitting day today now?

05:42:44 15 PRESIDENT: No, no. We are finishing at
16 6:00. We started with Mr. Gutiérrez an hour earlier
17 than planned, so his examination is taking exactly the
18 planned time. And we start tomorrow morning at 9:00.

19 MR. APPLETON: Of course, this was the
05:43:03 20 late day, so you've decided to not go late today and
21 move it to tomorrow?

22 PRESIDENT: As I just explained, we
23 started with Mr. Gutiérrez an hour earlier, so we are
24 exactly on the clock with his examination.

05:43:17 25 MR. APPLETON: I understand that. I'm

05:43:18 1 just trying to understand the timing on the agreed-upon
2 schedule. I need to make sure I understand this. So
3 we're not going to sit as late as we had scheduled
4 because we had picked up the hour. That's what you're
05:43:31 5 saying?

6 PRESIDENT: Yes, precisely, because we are
7 ahead of the schedule.

8 MR. APPLETON: When we're done, I need to
9 address a small matter that I need to advise the
05:43:40 10 Tribunal about just so --

11 PRESIDENT: There will be a discussion at
12 the end of the day anyway about housekeeping issues, so
13 we can do it then.

14 MR. APPLETON: Thank you.

05:45:17 15 PRESIDENT: Okay. Let's go on.

16 MR. ZUNIGA: Thank you, Mr. President.

17 Q. Mr. Gutiérrez, can you hear me okay?

18 A. Yes.

19 Q. Mr. Gutiérrez, you say in your first witness
05:45:34 20 statement that in January of 2014, 16,000 avocado trees
21 were planted on 40 hectares, an average of 400 per
22 hectare, correct?

23 A. No, that is not correct.

24 Q. That's not what you said in your first witness
05:45:55 25 statement?

05:45:56 1 A. If you can show it to me, I can explain it to
2 you.

3 Q. Of course.

4 MR. ZUNIGA: Ricky, can you please put up
05:46:03 5 CWS-02, paragraph 21?

6 MR. MULLINS: Counsel has repeatedly
7 mischaracterized the testimony. This is a statement
8 that's been corrected. So we can redirect, but I don't
9 think this is an appropriate way to question the
05:46:32 10 witness.

11 PRESIDENT: Yeah, I think you should draw
12 the witness' attention to the correction if there's a
13 correction related to this statement.

14 MR. ZUNIGA: I'm only asking about what he
05:46:45 15 said in his first statement, Mr. President. I know
16 there was a correction. I'll get to that.

17 MR. MULLINS: But it's not fair to have --
18 you've done this all day. You're stating statements as
19 fact, and then you go back and it's not true, including
05:47:00 20 questions from counsel, and this one you just simply
21 asked the witness to verify something that he's already
22 corrected. And I don't think it's appropriate, so I
23 would ask that if you ask a question about testimony
24 that's been corrected, that you note that there's a
05:47:14 25 correction.

05:47:17 1 MR. ZUNIGA: Again, what I've asked the
2 witness is to verify that in his first witness statement
3 he said what is stated in paragraph 21. I'm not
4 referring to the fact that this has been corrected. I'm
05:47:30 5 going to get to that later. I'm just asking him to
6 verify that this is the information he presented in his
7 first witness statement. I'm not saying that
8 information is correct. I'm only asking about the
9 veracity of the information, the fact that this is
05:47:45 10 included in his first witness statement.

11 PRESIDENT: I think we all know that it's
12 included in his witness statement. So what we are
13 interested in is the facts, not what he stated before
14 his correction. So go straight to the corrections.

05:47:58 15 MR. ZUNIGA: Thank you, Mr. President.

16 Q. In your second statement you corrected the
17 figure that you initially presented, and you indicate
18 that it was 44.75 hectares that were planted in January
19 of 2014, correct?

05:48:24 20 A. Correct.

21 Q. And on what did you base your correction,
22 Mr. Gutiérrez?

23 A. I made the correction because all the
24 documentation that we handle at the Santa Fé farm was
05:48:47 25 destroyed at the time of this -- when I gave my first

05:48:52 1 statement, I had not had the support of a study, an
2 AgroSat study that was done at the Santa Fé farm.
3 That's why in my second statement I was able to have
4 before me the satellite study done by AgroSat covering
05:49:11 5 the whole property.

6 Q. From what year is that study?

7 A. That study is from 2016.

8 Q. In other words, when you prepared your first
9 statement, that study had already been done, correct?

05:49:24 10 A. That is correct, sir.

11 Q. But you didn't review it before you prepared
12 your first statement?

13 A. No, because I didn't have it at the farm, and
14 since the farm was taken, all that information that was
05:49:38 15 at the farm was destroyed.

16 Now, in my second statement, I make the
17 correction because I called engineer Harold. That's the
18 name of the person who took the samples. And he had
19 that study. So I contacted him for him to provide to me
05:49:58 20 that AgroSat study.

21 Q. You could have called engineer Harold before
22 you prepared your first statement, correct?

23 A. I have reminded you several times of the
24 situation I was going through, right?

05:50:18 25 Q. Mr. Gutiérrez, you have said that

05:50:22 1 Rodrigo Jiménez was the avocado consultant who advised
2 you for the Hass avocado plantation, right?

3 A. Yes, that is correct.

4 Q. And according to your testimony, Mr. Jiménez
05:50:39 5 visited Hacienda Santa Fé on four occasions?

6 A. That's right.

7 Q. And only on four occasions?

8 A. Exactly.

9 Q. And, according to your testimony, after each
05:50:56 10 visit Mr. Jiménez would prepare a report, correct?

11 A. Yes, that's right.

12 Q. How would Mr. Jiménez convey his observations
13 and his report to INAGROSA?

14 A. First, he visited in 2016. That's the first
05:51:23 15 time that I interacted directly with him. We went
16 through all of the avocado plantation.

17 Q. But that wasn't my question.

18 What I asked you was after the visit, he
19 would draw up a report, correct?

05:51:38 20 A. Yes.

21 Q. And that report, he would send it to you or
22 share it with you. Is that right?

23 A. Yes, in 2016, in October, that's right.

24 Q. How would he send it to you?

05:51:53 25 A. He would send it by mail, and then he would go

05:51:56 1 back to his country, Costa Rica. He would take the
2 notes of what was to be corrected, and he would say:
3 "Luis, I'm going to send you the corrections and I
4 congratulate you because this project is shaping up to
05:52:11 5 be a total success."

6 Q. By email?

7 A. First, he would tell me face-to-face because we
8 would go through the whole plantation because he's an
9 advisor. So he would come onto the farm, he would look
05:52:23 10 at the corrections that would have to be made.

11 Q. Mr. Gutiérrez, I'm sorry for interrupting you
12 once again, but you're not answering the question.

13 What I asked you was how would he get the
14 report to you? You said by mail?

05:52:41 15 A. That's right. First, he would give me an oral
16 report in the field, and then he would ratify it by
17 mail.

18 Q. By email?

19 A. Yes, yes.

05:52:59 20 Q. Do you know that the Claimant has presented
21 only one of the supposed reports that Mr. Jiménez
22 prepared after his four visits?

23 A. Yes, sir.

24 MR. ZUNIGA: Ricky, could we please put up
05:53:15 25 annex C-86?

05:53:24 1 Q. Mr. Gutiérrez, I'm going to show you a copy of
2 the only report that the Claimant has presented that
3 contains Mr. Jiménez's recommendations.

4 A. Okay.

05:53:39 5 Q. Can you see the document on the screen?

6 A. Yes, I see it. I've read it.

7 Q. So you recognize the document?

8 A. Yes, I do.

9 Q. And this is one of the reports prepared by
05:53:50 10 Mr. Jiménez. Is that right?

11 A. Yes, it is, sir.

12 Q. Mr. Gutiérrez, this document doesn't have a
13 date, correct?

14 A. That's right.

05:54:05 15 Q. This document does not indicate anywhere that
16 the author of the document is engineer Jiménez. Is that
17 right?

18 A. Yes.

19 Q. Mr. Gutiérrez, our operator has put the cursor
05:54:35 20 on the photo, the first photo in this report. Can you
21 read -- can you see what is in the yellow?

22 A. Rodrigo Jiménez, that's right.

23 Q. It says: "Users/RJiménez/desktop/bionic/
24 Feb-Marzo 2016/photos of Santa Fé" and then a number and
05:55:15 25 what appears to be a date. Do you see that?

05:55:17 1 A. Uh-huh, yes.

2 Q. And this document is a document that's been
3 drafted on a computer, correct?

4 A. Yes.

05:55:25 5 Q. It's not done by hand?

6 A. No.

7 MR. ZUNIGA: Can we go to the next page,
8 Ricky, please, second paragraph? And we have an English
9 version of this as well, right? Yes. It's 150? The
05:56:02 10 second page of this document but then the English
11 version which we prepared. It's an R document. I don't
12 have it in my notes. R-108 and C-86.

13 Q. And for the record, the Spanish language
14 version, which is to the left, is the original presented
05:57:08 15 by the Claimant, and the English language version, which
16 is on the right-hand side, is the translation presented
17 by the Respondent.

18 MR. ZUNIGA: I need to go to the second
19 page, Ricky, please. And could you please highlight the
05:57:35 20 second paragraph?

21 Q. As you can see in that document, Mr. Jiménez
22 says the following:

23 "I reiterate that wind is one of our
24 limiting factors."

05:58:07 25 Correct?

05:58:07 1 A. Yes.

2 MR. ZUNIGA: Could you please highlight
3 the paragraph at the bottom of this page?

4 Q. The last paragraph of this page, Mr. Jiménez
05:58:42 5 says:

6 "One observes the origins that have been
7 gauged and their volume is considerable, it is high.
8 From the first cultivated plot, we moved to the
9 Los Mangos plot where there are beans alternated with
05:59:02 10 the avocado rootstock. It is a little covered by weeds,
11 but it is in process."

12 Did I read that correctly?

13 A. Yes, sir.

14 Q. You have said that one of the reasons why the
05:59:31 15 Hacienda Santa Fé has been damaged is because the
16 invaders planted beans, cabbage and other products, and
17 this altered the soil's pH. Is that correct?

18 A. Yes, sir, but beans directly don't have a
19 negative impact on the soil. Beans fix nitrogen to the
05:59:57 20 soil. The other products are the ones that have that
21 negative impact.

22 MR. ZUNIGA: Can we go to paragraph 151,
23 please, CWS-02?

24 Q. At 151 of your first statement -- and I'm going
06:00:16 25 to show this to you.

06:01:08 1 MR. ZUNIGA: Mr. President, I just noticed
2 it's 6:01. I just have a couple of minutes, if that's
3 okay.

4 PRESIDENT: That is entirely fine. Please
06:01:17 5 go on and finish this line of questioning.

6 MR. ZUNIGA: Thank you.

7 Q. Mr. Gutiérrez, do you see the language of
8 paragraph 151 of your first witness statement?

9 A. I do.

06:01:33 10 Q. Here you state the following:

11 "Rodrigo Jiménez advised INAGROSA's
12 management that the field had to be used exclusively for
13 the planting of avocado trees. Due to the pH level in
14 the soil, no other crop could be planted such as
06:01:53 15 potatoes or beans (or other legumes)."

16 Did I read that correctly?

17 A. You did, sir.

18 Q. So on the one hand, you said that there was no
19 impact when other things would be planted in the avocado
06:02:12 20 field, but here you say that Mr. Jiménez, the
21 consultant, had prohibited the planting of other crops?

22 A. Yes, sir, but he is making reference directly
23 to the crops that affect the soil, potatoes and beans.

24 Q. Well, but beans are just that, beans.

06:02:42 25 A. No, sir. What are beans?

06:02:46 1 Q. Well, let me rephrase the question, sir. A
2 bean is a grain, right?

3 A. Yes.

4 Q. And what about beans?

06:02:55 5 A. But there's a difference between beans
6 (habichuela) and beans (frijol).

7 MR. ZUNIGA: Let's go back to C-86, Ricky,
8 please. Can we go to the third page of the document?
9 Could you please highlight that first paragraph?

06:03:56 10 Q. Again, sir, this is the report by Mr. Jiménez,
11 correct?

12 A. Correct.

13 Q. On the first paragraph here on this page,
14 Mr. Jiménez says the following:

06:04:14 15 "It is excellent, this decision to go from
16 the rootstocks that were in the nursery to the field.
17 That decision was excellent because they're in very good
18 condition. Of course, it's a very large group to
19 graft."

06:04:28 20 Is that correct?

21 A. That's right.

22 Q. Mr. Jiménez is recognizing that, in the
23 plantation, ungrafted avocado trees were planted?

24 A. Yeah, they were in -- they were grafted that
06:04:46 25 same year.

06:04:48 1 Q. But that's not what the report says, right?

2 A. Yes, because that is at the time when he
3 visited the site, and that is his recommendation.

4 Q. That is the only report submitted by Claimant,
06:05:03 5 by Mr. Jiménez, correct?

6 A. Correct, because the other ones were stolen at
7 the Hacienda.

8 MR. ZUNIGA: Mr. President, we can stop
9 here, if that's okay with you.

06:05:18 10 PRESIDENT: Okay. Very good. Let's break
11 now and, Mr. Gutiérrez -- you hear me?

12 MR. GUTIERREZ: I can hear you,
13 Mr. President.

14 PRESIDENT: You are still under
06:05:34 15 examination until tomorrow, so tonight and tomorrow
16 morning, you cannot speak with anybody about your
17 testimony. You are still sequestered. So your
18 examination will continue tomorrow morning at 9:00, but
19 you are free to go now.

06:05:53 20 MR. GUTIERREZ: I will do as instructed,
21 Mr. President, with your permission.

22 PRESIDENT: Thank you, Mr. Gutiérrez. And
23 then we have a housekeeping issue, I understand.

24 MR. APPLETON: Yes, Mr. President. Please
06:06:11 25 keep the witness here with the translation on because I

06:06:14 1 can't speak to him. A, I can't speak to him and, B, I
2 can't speak Spanish to speak to him and he needs to hear
3 this as well.

4 PRESIDENT: So you want to speak with the
06:06:25 5 witness?

6 MR. APPLETON: And the Tribunal at the
7 same time. It affects -- you'll understand. You'll
8 understand. It's quite extraordinary.

9 MS. CONOVER: Does he need the microphone
06:06:38 10 on?

11 MR. APPLETON: No, but he needs to listen.
12 We're good. I may continue?

13 PRESIDENT: Yes.

14 MR. APPLETON: About an hour and a quarter
06:06:49 15 ago, Mrs. Rondón has been rushed to emergency to the
16 George Washington Hospital on the advice of her doctor.
17 The events that have been going on here have been
18 triggering events in any event to her, but -- and as she
19 mentioned, she's been having some significant issues
06:07:05 20 with the condition of her mother, who has not been very
21 good the last few days in any event.

22 But it's something quite urgent, and it's
23 quite serious. Mr. Rondón has gone with her. As a
24 result, we no longer have someone to give us
06:07:20 25 instruction. We were hoping that this would have been

06:07:24 1 just something that would have been ruled out. She's
2 still at the hospital and hasn't been treated yet. And
3 so I need to advise you of that, first of all.

4 It also affects, though, an issue with
06:07:37 5 respect to Mr. Gutiérrez, because Mr. Gutiérrez is
6 staying in the same facility, and they may have the keys
7 and we don't know how we're going to be able to deal
8 with this.

9 So besides the issue -- we do have at
06:07:52 10 least one person who will be able to speak to him in
11 Spanish -- but we're going to need to be able to deal
12 with some logistics with him that we normally would not
13 do at all to be able to facilitate to actually get him
14 back and forth and the other issues that go with it. We
06:08:07 15 obviously will not be discussing the matters of this
16 case.

17 PRESIDENT: I can tell you now that you
18 can certainly discuss with him -- and I understand there
19 is at least one Spanish speaker on your team. You can
06:08:17 20 discuss these kind of logistical issues with the witness
21 as long as you don't discuss his testimony. So that is
22 not a problem.

23 MR. APPLETON: And the condition, of
24 course, of Mrs. Rondón, what's going on, we just want to
06:08:30 25 identify that we have a series of unexpected events.

06:08:37 1 She passed me and I went and saw her and I immediately
2 got her out to the closest hospital, which is quite a
3 good one, and that's where she is right now.

4 So that also may have some impact on our
06:08:49 5 ability to be able to report on some issues tomorrow,
6 but we're doing the best we can. But it's difficult to
7 do things without having your clients and taking
8 instructions.

9 So I simply want to flag this because we
06:09:06 10 wanted to disclose it as early as we can. We did not
11 want to interrupt what was going on. We had hoped by
12 then to be able to have an answer. We don't have an
13 answer yet, and I just needed the Tribunal to be aware
14 of this.

06:09:19 15 PRESIDENT: Thank you very much. We are
16 very sorry to hear, of course, and the Tribunal's wishes
17 to Mrs. Rondón for a speedy recovery, obviously. Please
18 keep us posted. Please keep the Respondent posted and,
19 if necessary, revert to us before tomorrow morning, but
06:09:40 20 at the latest, we can see where we are at 9:00 tomorrow
21 morning.

22 MR. APPLETON: We will certainly tell you
23 what we know by 9, but it may mean that we may not have
24 a decision on other things in any event because we won't
06:09:56 25 have the opportunity to discuss matters or anything

06:09:57 1 else. Plus, there's information, quite frankly, I need
2 to be able to get, particularly from Mr. Rondón, and I
3 can't reach him at this point. So I'm simply conveying
4 the information that I know. I will continue to update
06:10:11 5 the Tribunal as I know things. We are all hopeful for a
6 recovery for Mrs. Rondón, but I certainly wanted to pass
7 this along.

8 PRESIDENT: Understood.

9 MS. GONZÁLEZ: Mr. President, sorry, if I
06:10:25 10 may. I am sorry -- I am really sorry about Ms. Rondón.

11 As you know, several members of our team
12 are locals. We live here in DC. I personally live two
13 blocks from the hospital, so if there is anything I can
14 do, to go pick up a key, anything, we would be really
06:10:43 15 happy to bring the key to where Mr. Gutiérrez is staying
16 or someone from my family. Just saying that we have
17 people that could help. We have our offices two blocks
18 from here also. So if there is anything that we can do
19 to help, please let us know.

06:10:59 20 MR. APPLETON: I thank the Respondent for
21 the very kind offer. At this point she's in the
22 emerge -- and in the intense part of the emerge -- so we
23 can't get in or out. We will certainly do the best we
24 can. We obviously would like to deal with the
06:11:13 25 logistics. For example, I don't believe that -- the

06:11:15 1 witness for tomorrow, if he can't get in, will have to
2 find a hotel but he won't have his clothes, or I don't
3 know what clothes he has, and he may not have his pass
4 card, which is yet another issue I need to pass along to
06:11:30 5 the secretary. He might need an emergency pass for
6 tomorrow, just a regular one for the day to get him in,
7 because if he can't get in, they have a hard key -- it's
8 not a number, it's a hard key for a house.

9 So the issues are -- we're working them
06:11:43 10 all through. The most important one is her health.
11 Then we'll worry about these other issues. But they've
12 all come up while we're in here. I will do my best to
13 try to work them out as we've done along this hearing
14 for every other logistical issue. It just was another
06:11:59 15 unanticipated event. And we thank for the offer, but
16 your office can't necessarily help us and she's at a
17 very good facility. It was good enough for our
18 president who was shot; it should be very good for her.
19 Those of us -- I used to have an office here. Those of
06:12:15 20 us who know Washington know exactly where that is. So
21 it's underway, and their daughter is at med school and
22 has actually worked at that hospital so...

23 PRESIDENT: But you'll be able to
24 communicate with Mr. Rondón so --

06:12:30 25 MR. APPLETON: We hope so. At this point

06:12:32 1 we can't. We've tried.

2 PRESIDENT: So you need to think about
3 what your position is tomorrow morning, depending on
4 where you are with the situation of Mrs. Rondón and
06:12:40 5 Mr. Rondón.

6 So keep us posted, keep the Respondent
7 posted and we will revert tomorrow morning to the topic.

8 Very good. Is there anything else on the
9 Respondent's side?

06:12:55 10 MS. GONZÁLEZ: Not for us, Mr. President.

11 PRESIDENT: Okay. Very good.

12 There is another issue that the Tribunal
13 wanted to raise. We are well on schedule. We have
14 reserved one hour -- actually two hours -- one hour and
06:13:12 15 15 minutes for the continuing cross-examination of
16 Mr. Gutiérrez. We understand that is within the
17 ballpark of what you need.

18 MR. ZUNIGA: Correct. Yes, sir.

19 PRESIDENT: So we are on schedule, plus
06:13:28 20 the redirect. And then we have Mr. Welty in the
21 afternoon. It would be good if Ms. Gutiérrez were
22 ready, if we can start a bit earlier or finish a bit
23 earlier tomorrow.

24 MS. GONZÁLEZ: Sure. No problem.

06:13:49 25 PRESIDENT: Very good. So that is the way

06:13:51 1 of making sure we have a full day tomorrow and we don't
2 need to overrun on Friday.

3 MS. GONZÁLEZ: Of course, it's possible
4 that, depending on what's happening, Mr. Castro, who is
06:14:01 5 remote, could also go earlier, right? We just -- the
6 parties need to be ready. I'm sorry, for July 5th.

7 MR. APPLETON: That could be a problem.
8 Let me just deal with each issue.

9 The person who will be examining
06:14:15 10 Ms. Gutiérrez is not here yet. We've contacted her and
11 had put her on an earlier flight, and so she is arriving
12 tonight close to midnight to be available for tomorrow.
13 So we've already proactively taken steps to try to deal
14 with that.

06:14:32 15 But just looking at the schedule, to the
16 extent that we can just get an idea of what's going on,
17 is it possible for us to get some idea with respect to
18 does counsel for the Republic of Nicaragua still believe
19 that roughly they're looking at that amount of
06:14:50 20 cross-examination time that they've reserved for
21 Mr. Welty, so we can decide about whether or not
22 Attorney General Gutiérrez will be on?

23 MS. GONZÁLEZ: We had already scheduled
24 two hours. We are now thinking on one hour and a half.

06:15:06 25 MR. APPLETON: I see. So it is possible

06:15:08 1 that we could get half an hour more in there. I see.

2 All right. Well, then I'd say that's quite likely.

3 With respect to, though, Commissioner

4 Castro, I am going to suggest that we try to fix that

06:15:25 5 time to be able to get people in as much as we can and

6 see what we can do around that. So perhaps counsel for

7 Nicaragua could assist us. How early could we move

8 Commissioner Castro in that day from their perspective

9 and then we'd have to see if we can get people there as

06:15:49 10 well early because we don't know. That's another step.

11 MS. GONZÁLEZ: Okay. As early as needed.

12 The facility -- this is a different ministry and their

13 room will be ready the whole morning for these

14 cross-examinations. So perhaps it could also help if we

06:16:08 15 can know whether the time that you have for

16 Diana Gutiérrez here that you indicated is one hour and

17 15 minutes, if you are still considering that it will

18 last for one hour and 15 minutes.

19 MR. APPLETON: I can't tell you that

06:16:23 20 because the person is on a plane who is dealing with it.

21 So I'm incommunicado there, so I can't tell you. But

22 let's assume that for the sake of this, that that is

23 roughly correct. So assuming that's roughly correct,

24 then the question would be how early -- because we know

06:16:43 25 there's a two-hour time difference there to Managua

06:16:46 1 between here because we'd have to see what we can
2 arrange.

3 Right now we had already arranged for our
4 person to be there at 10:30 local time. 10:30 local
06:16:58 5 time is 12:30. So we would then have to move that up
6 for sure if we thought that was there, but I'm just
7 trying to understand.

8 We do not have counsel of our own there.
9 We have to have other counsel that we have to retain,
06:17:13 10 and then we have to contact them to deal with that. So
11 it's always several steps.

12 PRESIDENT: I think what we discussed
13 already earlier this week is that both parties should be
14 prepared, their witnesses, so they are available earlier
06:17:29 15 than planned if we make progress the day before or a day
16 after if we fall behind. So I think for Mr. Castro, if
17 both parties are ready to start with him a couple of
18 hours earlier than what we have on the schedule, then we
19 should be good to go.

06:17:47 20 MR. APPLETON: Another option is simply to
21 move the order slightly and have Captain Herrera go
22 earlier because he's also on that day. That's another
23 option. We don't have to make that decision yet. I'm
24 just saying that there are a variety of options that are
06:18:02 25 available to be able to deal with the issues. It's the

06:18:05 1 remote issues that are always tricky.

2 PRESIDENT: We are in the parties' hands
3 with this. All we are saying is that if we finish with
4 Ms. Gutiérrez earlier in the morning than planned, then
06:18:18 5 we shouldn't unnecessarily have lengthy breaks, we
6 should be able to continue with the next witness, either
7 Mr. Castro or Mr. Herrera. We leave it to the parties
8 to liaise and make sure there are no gaps.

9 MS. GONZÁLEZ: Yes. Mr. President, our
06:18:33 10 client, Mr. Chamorro, that is with us here today,
11 mentioned -- yes, I would like to introduce him.

12 He mentioned that -- well, we have to keep
13 in mind that Managua is two hours behind. If needed, we
14 can start as early as around 8:30 Managua time, which
06:18:53 15 could be 10:30 here for Mr. Castro.

16 PRESIDENT: I don't think we need to start
17 earlier, so that will be certainly good enough.

18 MS. GONZÁLEZ: Okay. Thank you.

19 PRESIDENT: Very good. We would just ask
06:19:09 20 the parties to keep an eye on this and make sure we have
21 a good flow.

22 Okay. So let's call it a day.

23 MR. APPLETON: Can I just confirm, then,
24 is that a specific time that we can look to, 8:30, and I
06:19:58 25 can start making arrangements for 8:30 that morning? Is

06:20:02 1 that the proposal? Or is the proposal to go earlier
2 than 8:30 Managua time?

3 MS. GONZÁLEZ: The proposal is going
4 according to the schedule that we have right now.

06:20:12 5 MR. APPLETON: But we need -- but the
6 schedule now is much later. If we're going to organize
7 people, I need to be able to organize it.

8 PRESIDENT: Let's leave this for the
9 parties to sort this out. The Tribunal is not going to
06:20:24 10 be able to help you. All we are saying is that if we
11 can start with the witness earlier, we start with him
12 earlier so that there is no break. That's all that the
13 Tribunal expects. We leave it for the parties to sort
14 out when you can start.

06:20:42 15 MR. APPLETON: But, Mr. President, the
16 Republic of Nicaragua's client representative said,
17 through counsel, that they didn't want to start before
18 8:30 local time, which is 10:30 our time. So that's why
19 I'm seeking to confirm. So that's exactly the point.

06:20:55 20 Under your process, we would start earlier potentially
21 and so -- but what he has intimated to us is that we
22 could not start before 10:30 and that might leave a
23 hole -- that's the information I'm trying to
24 understand -- and then again, I have to have our person
06:21:12 25 there at least 20 minutes before that to clear security.

06:21:17 1 PRESIDENT: Yes, and it's highly unlikely
2 that we will start before 10:30.

3 MR. APPLETON: Okay. So we're going to
4 work on the basis of 10:30 now our time?

06:21:27 5 MS. GONZÁLEZ: Again, the person that --
6 your observer can be at the Ministry of Foreign Affairs
7 as early as that person wants to be there starting at
8 8:30 a.m. Managua time.

9 MR. APPLETON: Fine. So what that means
06:21:42 10 is -- that means if my person shows up at 8:30, we can't
11 start because it takes 20 minutes, according to you, to
12 get through the security. So that would mean that we
13 couldn't start until later. That's why I'm asking.

14 Please tell us so I can tell them. I will
06:21:57 15 have them sit and wait. I simply need to know what's
16 available to them because they're in your building with
17 your security and your rules. But I need to know this
18 as early as possible, and as you can see, I have a full
19 agenda of other items to deal with as well, so I really
06:22:11 20 need to know what the facility and the rules are now if
21 that's possible. What is it that you're proposing to
22 us?

23 MS. GONZÁLEZ: I'm proposing that starting
24 at 8:30, the person can be there. That's my proposal.

06:22:26 25 MR. APPLETON: That means, as you've told

06:22:27 1 me, that means we can't start until as early as 10:50
2 because you told us it takes 20 minutes to go through
3 security. So that's why I'm asking. These are your
4 rules, not mine. What is it that you can facilitate?

06:22:41 5 Can you have them be there earlier? If they can be
6 there at 8:10 then we could start that --

7 PRESIDENT: Let's not have this discussion
8 before the Tribunal. The Tribunal will not be able to
9 contribute to your discussion. If you can be ready to
06:22:54 10 start at 10:30 local time, DC time, that is good. And
11 there is a time range from 10:30 until 12:45, so you
12 should be ready and available to start during that time
13 period whenever we finish witness Gutiérrez. That's
14 what the Tribunal is interested in.

06:23:12 15 MR. APPLETON: We look forward to getting
16 that logistical information as early as possible from
17 the Respondent and then --

18 PRESIDENT: You need to speak between
19 counsel directly.

06:23:23 20 MR. APPLETON: I'm going to deal with the
21 hospital issue first.

22 PRESIDENT: That is always the preferred
23 way of dealing with issues directly between counsel.
24 But if you need Tribunal assistance, the Tribunal is
06:23:33 25 available if you cannot agree.

06:23:37 1 MS. GONZÁLEZ: I'm happy to send you an
2 email with the information, and I am happy to copy
3 Ms. Conover so she can know what is the availability of
4 the Republic of Nicaragua. Thank you.

06:24:00 5 PRESIDENT: This is going into a bazaar.
6 Let's finish now. Counsel can speak directly. All the
7 Tribunal is saying is that the parties should be
8 prepared to start with Mr. Herrera as of 10:30 DC time.
9 At the same time you should be prepared to start later
06:24:20 10 if the examination of Ms. Gutiérrez continues beyond
11 lunch and we will be actually on the program. That's
12 all we are saying.

13 MR. APPLETON: Excuse me, Mr. President.
14 You asked now for Mr. Herrera. Do you mean Mr. Castro?

06:24:35 15 PRESIDENT: Mr. Castro. Apologies, yes.

16 MS. GONZÁLEZ: Thank you, Mr. President.

17 PRESIDENT: Thank you very much. We'll
18 see you tomorrow morning at 9:00.

19 (Hearing adjourned at 6:24 p.m.)
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<p>MR. APPLETON: [48] 530/6 530/9 530/11 530/25 531/18 532/4 623/21 624/8 624/11 624/17 625/3 634/2 643/3 643/22 644/7 645/1 645/6 646/12 659/4 659/22 660/11 660/15 756/12 756/19 756/25 757/8 757/14 768/24 769/6 769/11 769/14 770/23 771/22 772/20 773/25 775/7 775/25 776/19 777/20 778/23 779/5 779/15 780/3 780/9 780/25 781/15 781/20 782/13</p> <p>MR. GUTIERREZ: [7] 688/11 689/11 689/15 695/16 727/1 768/12 768/20</p> <p>MR. GUTIÉRREZ: [5] 681/20 682/5 682/13 682/16 683/5</p> <p>MR. HILL: [46] 595/4 616/13 625/12 633/13 633/22 634/3 634/8 635/16 635/23 638/22 641/4 642/9 645/12 647/8 649/9 652/8 653/20 654/1 654/6 654/25 657/22 657/25 658/11 658/22 659/2 660/25 661/4 663/6 663/8 664/6 664/10 664/13 665/24 666/15 673/13 674/13 674/20 675/19 676/6 677/5 678/1 679/6 679/13 680/5 680/8 680/15</p> <p>MR. 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CONOVER: [2] 600/9 769/9</p> <p>MS. GONZÁLEZ: [18] 651/11 666/6 666/10 693/5 694/11 772/9 774/10 774/24 775/3 775/23 776/11 778/9 778/18 779/3 780/5 780/23 782/1 782/16</p> <p>MS. 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