

[REDACTED]

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**From:** Jed Margolin [REDACTED]  
**Sent:** Tuesday, August 05, 2008 1:56 PM  
**To:** McNutt, Jan (HQ-MC000)  
**Subject:** NASA Case I-222  
**Attachments:** jm\_scs\_report.zip

b(6)

Dear Mr. McNutt.

I have attached the documents we discussed.

Regards,

Jed Margolin

02434

\\Documents and Settings\cgraham3\Local Settings\Temporary Internet Files\Content.Outlook\928XGK4M\jm\_scs\_repo

Name	Type	Modified	Size	Ratio	Packed	Path
jm_sc_sheriff.pdf	Adobe Acrobat Doc...	2/6/2008 10:26 PM	283,095	22%	219,944	
jm_scs_ap_A.pdf	Adobe Acrobat Doc...	12/22/2007 9:26 AM	217,549	50%	109,113	
jm_scs_ap_B.pdf	Adobe Acrobat Doc...	12/18/2007 11:14 AM	282,713	7%	262,627	
jm_scs_ap_C.pdf	Adobe Acrobat Doc...	12/22/2007 10:11 AM	446,495	5%	426,046	
jm_scs_ap_D.pdf	Adobe Acrobat Doc...	2/3/2008 7:28 AM	49,464	46%	26,763	
jm_scs_ap_E.pdf	Adobe Acrobat Doc...	2/3/2008 7:30 AM	2,045,793	10%	1,833,276	
jm_scs_ap_F.pdf	Adobe Acrobat Doc...	2/4/2008 8:47 AM	278,327	6%	260,805	
jm_scs_ap_G.pdf	Adobe Acrobat Doc...	2/1/2008 10:17 AM	326,624	56%	143,876	
jm_scs_ap_H.pdf	Adobe Acrobat Doc...	2/1/2008 10:38 AM	120,353	49%	61,379	
<b>9 file(s)</b>			<b>4,050,413</b>	<b>17%</b>	<b>3,343,829</b>	

# VOLUNTARY STATEMENT

Page 1 of 4 Pages.

NAME: Margolin Jed

DOB: [REDACTED]

ADDRESS: Last [REDACTED] First [REDACTED] Middle [REDACTED]

SOC: [REDACTED]

[REDACTED]

PHONE: [REDACTED]

DATE 2/6/2008 PLACE [REDACTED]

TIME STARTED 12/12/2007 M

Please see attached statement and accompanying documents.

[Lined area for statement content]

This statement was completed at \_\_\_\_\_ M. on the 6<sup>th</sup> day of February, 2008

WITNESS: [Signature: Monique Cruise]

[Signature: Jed Margolin]  
Signature of person giving voluntary statement

WITNESS: \_\_\_\_\_

Attachment to Voluntary Statement  
Storey County Sheriff Report, Case #07-1668

Jed Margolin

b(6) [REDACTED] (Virginia City Highlands)

On Wednesday morning, December 12, 2007 I was checking the status of one of my patent applications pending at the U.S. Patent and Trademark Office (USPTO) when I discovered that assignment papers had been filed for four patents that had already been issued:

**U.S. Patent 5,566,073 Pilot Aid Using A Synthetic Environment**

**U.S. Patent 5,904,724 Method and Apparatus For Remotely Piloting an Aircraft**

**U. S. Patent 5,978,488 Simulated AM Radio**

**U.S. Patent 6,377,436 Microwave Transmission Using a Laser-Generated Plasma Beam Waveguide**

See *Appendix A* for the USPTO's record of the assignments. I am also attaching copies of the patents.

What caught my attention was that the company named is Optima Technology Corporation (NV).

I have an agreement with Optima Technology Group Inc. (DE) giving them ownership of these patents in return for a percentage of the money received by licensing or selling them, so I have a real interest in who is listed as the Assignee for the patents.

Later in the day during a conversation with Robert Adams, CEO of Optima Technology Group, I mentioned these recently filed assignments. He became concerned because he had not instructed the company's attorneys to file the assignments.

While he called the company's attorneys I called the USPTO Assignment Division to get further information because the assignments say "See Document For Detail" but the documents themselves are not available on the USPTO's web site.

The Assignment Division clerk very kindly agreed to read me the information on the documents instead of making me order them and wait to receive them in the mail. I asked her who filed the assignments. She said, "Reza Zandian." I asked her if the documents had my signature on them. She said that some did not but that at least one did. I informed her that I had not signed any such documents and that this appeared to be an attempt to steal the patents. Her response was that I should order the documents and contact Mr. Zandian and ask him to give the patents back.

Optima Technology Group's attorneys were able to get copies of the documents the next day. See *Appendix B*.

They also found some information on Mr. Zandian.

According to the article by the Wisconsin Project on Nuclear Weapons Control "Iran: Shopping for Missile Technology - *The Risk Report* - Volume 3 Number 1 (January-February 1997)"

In 1993, U.S. federal agents arrested an Iranian citizen, Reza Zandian, and an American, Charles Reeger, for attempting to illegally export one of IBM's most powerful computers, the ES-9000, to Iran. The pair

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apparently operated through two small companies in southern California: Lucach Corporation/Computerworld and Iran Business Machines. Commerce Department officials were quoted by the press as saying that the ES-9000 would have been used for Iranian weapon development.

I have attached a copy of the article as *Appendix C*.

The patent assignment documents filed by Mr. Zandian claim the rights to the patents from the Power of Attorney that I gave to Robert Adams in 2004. The Power of Attorney plainly states in section 2.1:

**2.1 Signature of Attorney in Fact: *Optima Technology Inc. – Robert Adams, CEO, when acting as my attorney in fact shall use the following form when signing on my behalf pursuant to this Power: “Jed Margolin by Optima Technology, Inc. c/o Robert Adams, CEO his attorney in fact.”***

The assignment documents filed do not contain this statement. They are bogus.

b6(c) I have no association with Mr. Zandian or his attorney (listed in the documents as John Peter Lee, Ltd., [REDACTED]).

As Optima Technology Group’s attorney, M. Lawrence Oliverio of the law firm of Rissman Jobse Hendricks & Oliverio) puts it:

In summary, one of the documents attached is a copy of a document filed recently (December 5, 2007) with the United U.S. Patent Office bearing a “forged” signature, forged by a Mr. Reza Zandian for purposes of defrauding the Patent Office into believing that Mr. Zandian owns or controls certain patents issued to a Mr. Jed Margolin. Other of the attached documents signed and filed by Mr. Zandian himself also state fraudulently that Mr. Margolin’s patents have been assigned to a scam California (or Nevada) corporate entity created by Mr. Zandian. In fact, neither Mr. Zandian nor his scam corporation(s), has any legitimate claim to ownership of any United States patent. Mr. Zandian filed these attached documents in a larger scheme to fraudulently demand money from the legitimate owner of the patents in issue (a legitimate Delaware corporation to which Mr. Margolin assigned the patents).

Because of the serious nature of Mr. Zandian’s fraud Optima Technology Group’s attorneys have been in contact with FBI. (See *Appendix D* and *Appendix E*). This is not the first time Mr. Zandian has committed fraud. In the case mentioned in the email Optima Technology Group’s attorneys document that Mr. Zandian committed “check fraud” by outright and knowingly misrepresenting to Lazo Trucking Company that he had sent them a certified check for \$9,000 and that Lazo had accepted the certified check. In fact Mr. Zandian had deposited the very check for \$9,000 in his own bank account. Mr. Zandian’s purpose was to attempt to defraud Lazo Trucking into picking up 12 containers of scrap metal and delivering it to a location in Las Vegas, Nevada. As Optima Technology Group’s attorneys explain, “This ‘is’ check fraud, a felony, a crime.” They also document that in Mr. Zandian’s dealings with Lazo Trucking he attempted to commit insurance fraud and to coax a third party to commit insurance fraud on his behalf. This is based on the deposition taken of Lazo Trucking’s attorney Susan Salisbury and the following testimony at page 74 of Ms. Salisbury’s deposition (a full copy of Ms. Salisbury’s deposition is attached as *Appendix F*).

- 19 Q Did you believe that if your client  
20 submitted such a claim that it might rise to the  
21 level of fraud?  
22 A Yes. Not on the part of my client but that  
23 it was a fraudulent claim, yes.

Ms. Salisbury's deposition tells the complicated (but riveting) story of how Mr. Zandian tried to defraud her client (Lazo Trucking) and how he, to some extent, succeeded. At some point FBI and Homeland Security became involved because "FBI and Homeland Security believed that Mr. Zandian might be using these containers to disguise other forbidden cargo." (Appendix F, Page 76, line 12.)

Mr. Zandian's attempt to fraudulently get ownership of the patents previously described has also been reported to the San Diego Sheriff Department.

James F. Blanco, Sergeant  
San Diego Sheriff Department  
CATCH Team (Computer And Technology Crime Hi-tech response team)

b(6)

[Redacted] 101

[Redacted] 57  
[Redacted] 56

[Redacted]

It should be noted that at least one of the patents (U.S. Patent 6,377,436 **Microwave Transmission Using a Laser-Generated Plasma Beam Waveguide**) has military applications. The attempted theft of this patent in particular is of especially grave concern to me.

In addition, according to the public record Mr. Zandian is associated with a number of Nevada companies, including (from *Appendix G*):

- Gold Canyon Development LLC - Managing Member
- Lyon Park Development LLC - Managing Member
- Dayton Plaza LLC - Manager
- Stagecoach Valley LLC - Resident Agent

Gold Canyon Development owns 680 acres in Storey County (See *Appendix H*) which he persuaded the County to upzone to Light Industrial for a project that never happened.

I am concerned that Mr. Zandian may be up to some mischief in our County.

Jed Margolin 2-G-2008

Jed Margolin  
VC Highlands, NV

08/513,298 PILOT AID USING SYNTHETIC REALITY

12-12-  
2007::11:06:48**Patent Assignment Abstract of Title****Total Assignments: 3****Application #:** 08513298**Filing Dt:** 08/09/1995**Patent #:** 5566073**Issue Dt:** 10/15/1996**PCT #:** NONE**Publication #:** NONE**Pub Dt:****Inventor:** JED MARGOLIN**Title:** PILOT AID USING SYNTHETIC REALITY**Assignment: 1****Reel/Frame:** 020218 / 0085**Received:** 12/05/2007**Recorded:** 12/05/2007**Mailed:** 12/10/2007**Pages:** 4**Conveyance:** ASSIGNMENT OF ASSIGNORS INTEREST (SEE DOCUMENT FOR DETAILS).**Assignor:** MARGOLIN, JED**Exec Dt:** 12/05/2007**Assignee:** OPTIMA TECHNOLOGY CORPORATION (NV)  
830 LAS VEGAS BOULEVARD SOUTH  
C/O JOHN PETER LEE LIMITED  
LAS VEGAS, NEVADA 89101**Correspondent:** OPTIMA TECHNOLOGY CORPORATION (NV)C/O JOHN PETER LEE LIMITED  
830 LAS VEGAS BPULEVARD SOUTH  
LAS VEGAS, NEVADA 89101**Assignment: 2****Reel/Frame:** 020218 / 0089**Received:** 12/05/2007**Recorded:** 12/05/2007**Mailed:** 12/10/2007**Pages:** 5**Conveyance:** ASSIGNMENT OF ASSIGNORS INTEREST (SEE DOCUMENT FOR DETAILS).**Assignor:** MARGOLIN, JED BASED ON POWER OF ATTORNEY DATED JULY 20,2004  
TO: OPTIMA TECHNOLOGY CORPORATION (CA)**Exec Dt:** 12/05/2007**Assignee:** OPTIMA TECHNOLOGY CORPORATION (NV)  
830 LAS VEGAS BOULEVARD SOUTH  
C/O JOHN PETER LEE LIMITED  
LAS VEGAS, NEVADA 89101**Correspondent:** OPTIMA TECHNOLOGY COPORATION (NV)C/O JOHN PETER LEE LIMITED  
830 LAS VEGAS BPULEVARD SOUTH  
LAS VEGAS, NEVADA 89101**Assignment: 3****Reel/Frame:** 020227 / 0287**Received:** 12/07/2007**Recorded:** 12/07/2007**Mailed:** 12/11/2007**Pages:** 2**Conveyance:** ASSIGNMENT OF ASSIGNORS INTEREST (SEE DOCUMENT FOR DETAILS).**Assignor:** MARGOLIN, JED**Exec Dt:** 12/05/2007**Assignee:** OPTIMA TECHNOLOGY CORPORATION (NV)  
830 LAS VEGAS BOULEVARD SOUTH  
C/O JOHN PETER LEE LIMITED  
LAS VEGAS, NEVADA 89101**Correspondent:** OPTIMA TECHNOLOGY CORPORATION (NV)C/O JOHN PETER LEE LIMITED  
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Search Results as of: 12/12/2007 11:06:42 AM

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08/587,731    METHOD AND APPARATUS FOR REMOTELY PILOTING AN AIRCRAFT    12-12-2007::11:08:11

**Patent Assignment Abstract of Title**

**Total Assignments: 3**

Application #: 08587731    Filing Dt: 01/19/1996    Patent #: 5904724    Issue Dt: 05/18/1999  
PCT #: NONE    Publication #: NONE    Pub Dt:  
Inventor: JED MARGOLIN  
Title: METHOD AND APPARATUS FOR REMOTELY PILOTING AN AIRCRAFT

**Assignment: 1**

Reel/Frame: 020218 / 0085    Received: 12/05/2007    Recorded: 12/05/2007    Mailed: 12/10/2007    Pages: 4

Conveyance: ASSIGNMENT OF ASSIGNORS INTEREST (SEE DOCUMENT FOR DETAILS).

Assignor: MARGOLIN, JED

Exec Dt: 12/05/2007

Assignee: OPTIMA TECHNOLOGY CORPORATION (NV)  
830 LAS VEGAS BOULEVARD SOUTH  
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Correspondent: OPTIMA TECHNOLOGY CORPORATION (NV)  
C/O JOHN PETER LEE LIMITED  
830 LAS VEGAS BPULEVARD SOUTH  
LAS VEGAS, NEVADA 89101

**Assignment: 2**

Reel/Frame: 020218 / 0089    Received: 12/05/2007    Recorded: 12/05/2007    Mailed: 12/10/2007    Pages: 5

Conveyance: ASSIGNMENT OF ASSIGNORS INTEREST (SEE DOCUMENT FOR DETAILS).

Assignor: MARGOLIN, JED BASED ON POWER OF ATTORNEY DATED JULY 20,2004  
TO: OPTIMA TECHNOLOGY CORPORATION (CA)

Exec Dt: 12/05/2007

Assignee: OPTIMA TECHNOLOGY CORPORATION (NV)  
830 LAS VEGAS BOULEVARD SOUTH  
C/O JOHN PETER LEE LIMITED  
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Correspondent: OPTIMA TECHNOLOGY COPORATION (NV)  
C/O JOHN PETER LEE LIMITED  
830 LAS VEGAS BPULEVARD SOUTH  
LAS VEGAS, NEVADA 89101

**Assignment: 3**

Reel/Frame: 020227 / 0287    Received: 12/07/2007    Recorded: 12/07/2007    Mailed: 12/11/2007    Pages: 2

Conveyance: ASSIGNMENT OF ASSIGNORS INTEREST (SEE DOCUMENT FOR DETAILS).

Assignor: MARGOLIN, JED

Exec Dt: 12/05/2007

Assignee: OPTIMA TECHNOLOGY CORPORATION (NV)  
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Correspondent: OPTIMA TECHNOLOGY CORPORATION (NV)  
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09/148,045 SIMULATED AM RADIO

12-12-  
2007::11:04:39**Patent Assignment Abstract of Title****Total Assignments: 3****Application #:** 09148045**Filing Dt:** 09/03/1998**Patent #:** 5978488**Issue Dt:** 11/02/1999**PCT #:** NONE**Publication #:** NONE**Pub Dt:****Inventor:** JED MARGOLIN**Title:** SIMULATED AM RADIO**Assignment: 1****Reel/Frame:** 020218 / 0085    **Received:** 12/05/2007    **Recorded:** 12/05/2007    **Mailed:** 12/10/2007    **Pages:** 4**Conveyance:** ASSIGNMENT OF ASSIGNORS INTEREST (SEE DOCUMENT FOR DETAILS).**Assignor:** MARGOLIN, JED**Exec Dt:** 12/05/2007**Assignee:** OPTIMA TECHNOLOGY CORPORATION (NV)  
830 LAS VEGAS BOULEVARD SOUTH  
C/O JOHN PETER LEE LIMITED  
LAS VEGAS, NEVADA 89101**Correspondent:** OPTIMA TECHNOLOGY CORPORATION (NV)C/O JOHN PETER LEE LIMITED  
830 LAS VEGAS BPULEVARD SOUTH  
LAS VEGAS, NEVADA 89101**Assignment: 2****Reel/Frame:** 020218 / 0089    **Received:** 12/05/2007    **Recorded:** 12/05/2007    **Mailed:** 12/10/2007    **Pages:** 5**Conveyance:** ASSIGNMENT OF ASSIGNORS INTEREST (SEE DOCUMENT FOR DETAILS).**Assignor:** MARGOLIN, JED BASED ON POWER OF ATTORNEY DATED JULY 20,2004  
TO: OPTIMA TECHNOLOGY CORPORATION (CA)**Exec Dt:** 12/05/2007**Assignee:** OPTIMA TECHNOLOGY CORPORATION (NV)  
830 LAS VEGAS BOULEVARD SOUTH  
C/O JOHN PETER LEE LIMITED  
LAS VEGAS, NEVADA 89101**Correspondent:** OPTIMA TECHNOLOGY COPORATION (NV)C/O JOHN PETER LEE LIMITED  
830 LAS VEGAS BPULEVARD SOUTH  
LAS VEGAS, NEVADA 89101**Assignment: 3****Reel/Frame:** 020227 / 0287    **Received:** 12/07/2007    **Recorded:** 12/07/2007    **Mailed:** 12/11/2007    **Pages:** 2**Conveyance:** ASSIGNMENT OF ASSIGNORS INTEREST (SEE DOCUMENT FOR DETAILS).**Assignor:** MARGOLIN, JED**Exec Dt:** 12/05/2007**Assignee:** OPTIMA TECHNOLOGY CORPORATION (NV)  
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09/543,252	MICROWAVE TRANSMISSION USING A LASER-GENERATED PLASMA BEAM WAVEGUIDE	12-12-2007::11:10:31
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### Patent Assignment Abstract of Title

**Total Assignments: 3**

<b>Application #:</b> 09543252	<b>Filing Dt:</b> 04/05/2000	<b>Patent #:</b> 6377436	<b>Issue Dt:</b> 04/23/2002
<b>PCT #:</b> NONE		<b>Publication #:</b> NONE	<b>Pub Dt:</b>
<b>Inventor:</b> Jed Margolin			
<b>Title:</b> MICROWAVE TRANSMISSION USING A LASER-GENERATED PLASMA BEAM WAVEGUIDE			

**Assignment: 1**

<b>Reel/Frame:</b> 020218 / 0085	<b>Received:</b> 12/05/2007	<b>Recorded:</b> 12/05/2007	<b>Mailed:</b> 12/10/2007	<b>Pages:</b> 4
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**Conveyance:** ASSIGNMENT OF ASSIGNORS INTEREST (SEE DOCUMENT FOR DETAILS).**Assignor:** MARGOLIN, JED**Exec Dt:** 12/05/2007

**Assignee:** OPTIMA TECHNOLOGY CORPORATION (NV)  
830 LAS VEGAS BOULEVARD SOUTH  
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**Correspondent:** OPTIMA TECHNOLOGY CORPORATION (NV)  
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**Assignment: 2**

<b>Reel/Frame:</b> 020218 / 0089	<b>Received:</b> 12/05/2007	<b>Recorded:</b> 12/05/2007	<b>Mailed:</b> 12/10/2007	<b>Pages:</b> 5
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**Conveyance:** ASSIGNMENT OF ASSIGNORS INTEREST (SEE DOCUMENT FOR DETAILS).**Assignor:** MARGOLIN, JED BASED ON POWER OF ATTORNEY DATED JULY 20, 2004 TO: OPTIMA TECHNOLOGY CORPORATION (CA)**Exec Dt:** 12/05/2007

**Assignee:** OPTIMA TECHNOLOGY CORPORATION (NV)  
830 LAS VEGAS BOULEVARD SOUTH  
C/O JOHN PETER LEE LIMITED  
LAS VEGAS, NEVADA 89101

**Correspondent:** OPTIMA TECHNOLOGY COPORATION (NV)  
C/O JOHN PETER LEE LIMITED  
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LAS VEGAS, NEVADA 89101

**Assignment: 3**

<b>Reel/Frame:</b> 020227 / 0287	<b>Received:</b> 12/07/2007	<b>Recorded:</b> 12/07/2007	<b>Mailed:</b> 12/11/2007	<b>Pages:</b> 2
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**Conveyance:** ASSIGNMENT OF ASSIGNORS INTEREST (SEE DOCUMENT FOR DETAILS).**Assignor:** MARGOLIN, JED**Exec Dt:** 12/05/2007

**Assignee:** OPTIMA TECHNOLOGY CORPORATION (NV)  
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**Correspondent:** OPTIMA TECHNOLOGY CORPORATION (NV)  
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 DIRECTOR OF THE UNITED STATES PATENT AND TRADEMARK OFFICE

**\*700352576A\***  
 \*700352576A\*

DECEMBER 10, 2007

PTAS

 OPTIMA TECHNOLOGY CORPORATION (NV)  
 C/O JOHN PETER LEE LIMITED  
 830 LAS VEGAS BOULEVARD SOUTH  
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RECORDATION DATE: 12/05/2007

 REEL/FRAME: 020218/0085  
 NUMBER OF PAGES: 4

BRIEF: ASSIGNMENT OF ASSIGNOR'S INTEREST (SEE DOCUMENT FOR DETAILS).

 ASSIGNOR:  
 MARGOLIN, JED

DOC DATE: 12/05/2007

 ASSIGNEE:  
 OPTIMA TECHNOLOGY CORPORATION (NV)  
 830 LAS VEGAS BOULEVARD SOUTH  
 C/O JOHN PETER LEE LIMITED  
 LAS VEGAS, NEVADA 89101

 SERIAL NUMBER: 08513298  
 PATENT NUMBER: 5566073  
 TITLE: PILOT AID USING SYNTHETIC REALITY

 FILING DATE: 08/09/1995  
 ISSUE DATE: 10/15/1996

 SERIAL NUMBER: 08587731  
 PATENT NUMBER: 5904724  
 TITLE: METHOD AND APPARATUS FOR REMOTELY PILOTING AN AIRCRAFT

 FILING DATE: 01/19/1996  
 ISSUE DATE: 05/18/1999

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020218/0085 PAGE 2

SERIAL NUMBER: 09543252  
PATENT NUMBER: 6377436

FILING DATE: 04/05/2000  
ISSUE DATE: 04/23/2002

TITLE: MICROWAVE TRANSMISSION USING A LASER-GENERATED PLASMA BEAM WAVEGUIDE

SERIAL NUMBER: 09148045  
PATENT NUMBER: 5978488  
TITLE: SIMULATED AM RADIO

FILING DATE: 09/03/1998  
ISSUE DATE: 11/02/1999

THERESA FREDERICK, EXAMINER  
ASSIGNMENT SERVICES BRANCH  
PUBLIC RECORDS DIVISION

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12/05/2007  
700352576

858-625-2460

p. 2

Form PTO-1595 (Rev. 07/05)  
OMB No. 0851-0027 (exp. 8/30/2008)

U.S. DEPARTMENT OF COMMERCE  
United States Patent and Trademark Office

### RECORDATION FORM COVER SHEET PATENTS ONLY

To the Director of the U.S. Patent and Trademark Office: Please record the attached documents or the new address(es) below.

#### 1. Name of conveying party(ies)

Jed Margolin  
based on Power of Attorney dated July 20, 2004  
to: Optima Technology Corporation (CA)

Additional name(s) of conveying party(ies) attached?  Yes  No

#### 3. Nature of conveyance/Execution Date(s):

Execution Date(s) December 5, 2007

- Assignment  Merger
- Security Agreement  Change of Name
- Joint Research Agreement
- Government Interest Assignment
- Executive Order 9424, Confirmatory License
- Other

#### 2. Name and address of receiving party(ies)

Name: Optima Technology Corporation (NV)

Internal Address: c/o John Peter Lee Limited

Street Address: 830 Las Vegas Boulevard South

City: Las Vegas

State: Nevada

Country: U.S.A. Zip: 89101

Additional name(s) & address(es) attached?  Yes  No

#### 4. Application or patent number(s):

A. Patent Application No.(s)

This document is being filed together with a new application.

B. Patent No.(s)

6,568,073  
5,904,724  
6,377,436  
5,978,488

Additional numbers attached?  Yes  No

#### 5. Name and address to whom correspondence concerning document should be mailed:

Name: Optima Technology Corporation (NV)

Internal Address: c/o John Peter Lee Limited

Street Address: 830 Las Vegas Boulevard South

City: Las Vegas

State: Nevada Zip: 89101

Phone Number: 702-392-4044

Fax Number: 702-383-9950

Email Address: info@johnpeterlee.com

#### 6. Total number of applications and patents Involved: 4

7. Total fee (37 CFR 1.21(h) & 3.41) \$ 160.00

- Authorized to be charged by credit card
- Authorized to be charged to deposit account
- Enclosed
- None required (government interest not affecting title)

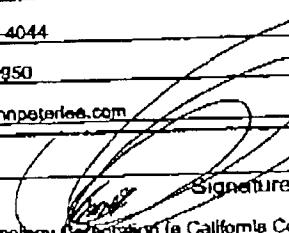
#### 8. Payment Information

a. Credit Card Last 4 Numbers 1004  
Expiration Date 01/09

b. Deposit Account Number \_\_\_\_\_

Authorized User Name \_\_\_\_\_

#### 9. Signature:

  
Signature

12/5/2007  
Date

Optima Technology Corporation (a California Corporation)  
Name of Person Signing

Total number of pages including cover sheet, attachments, and documents: 7

Documents to be recorded (including cover sheet) should be faxed to (571) 273-0140, or mailed to: Mail Stop Assignment Recordation Services, Director of the USPTO, P.O. Box 1450, Alexandria, V.A. 22313-1450

OP \$160.00 \$566073

Dec 05 07 02:31P nikan  
NISSAN-SALES PROMOTION Fax:310-771-2073

858-625-2460  
Feb 16 2006 7:38 P.01

**Optima Technology**  
**Proprietary & Confidential**  
**Information**

RECORDING REQUESTED BY  
AND WHEN RECORDED MAIL TO:  
Optima Technology Inc.  
Robert Adams - CEO  
2222 Michelson, Suite 1830  
Irvine, California 92612

**MARGOLIN DURABLE POWER OF ATTORNEY  
FOR MANAGEMENT OF PROPERTY AND PERSONAL AFFAIRS  
RELATED ONLY TO THE SALE AND/OR LICENSING OF RELATED PATENTS  
AND TO PERSON EXECUTING THIS DOCUMENT**

DURABLE GENERAL POWER OF ATTORNEY AND A DURABLE POWER OF  
ATTORNEY IS AN IMPORTANT LEGAL DOCUMENT. BY SIGNING THE  
DURABLE POWER OF ATTORNEY, YOU ARE AUTHORIZING ANOTHER PERSON  
TO ACT FOR YOU, THE PRINCIPAL. BEFORE YOU SIGN THIS DURABLE POWER  
OF ATTORNEY, YOU SHOULD KNOW THESE IMPORTANT FACTS:

YOUR AGENT (ATTORNEY IN FACT) HAS NO DUTY TO ACT UNLESS YOU AND  
YOUR AGENT AGREE OTHERWISE IN WRITING.

THIS DOCUMENT GIVES YOUR AGENT THE POWERS TO MANAGE, DISPOSE  
OF, SELL AND CONVEY YOUR PERSONAL PROPERTY, PATENTS ONLY, LISTED  
AS:

Issued Patents:

- 5,422,998 ✓
- 5,553,229 ✓
- 5,933,156 ✓
- 5,566,073
- 5,984,714
- 5,974,423 ✓
- 6,023,278 ✓
- 6,377,436
- 6,177,943 ✓
- 5,978,488

Pending patents:

09/947,801

Non-Provisional Application for patent:

11/130,939

Dec 05 07 02:31p nikan

858-625-2460

p. 5

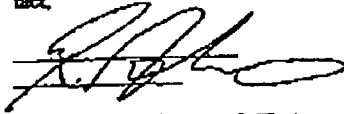
NISSAN-SALES PROMOTION Fax:310-771-2073

Feb 16 2006 7:40

P.04

**Optima Technology**  
**Proprietary & Confidential**  
**Information**

2.1. Signature of Attorney in Fact. Optima Technology Inc. - Robert Adams, CEO, when acting as my attorney in fact shall use the following form when signing on my behalf pursuant to this Power: " Jed Margolin by Optima Technology, Inc., c/o Robert Adams, CEO his attorney in fact."



Acceptance by Attorney in Fact

Robert Adams

Date: 20 July 2004

Optima Technology  
ACKNOWLEDGMENT

2.2. Photostatic Copies. Persons dealing with my attorney fact may rely fully on a photostatic copy of this Power.

2.3. Severability. If any of the provisions of this Power are found to be invalid for any reason, such invalidity shall not affect any of the other provisions of this Power, and all invalid provisions shall be wholly disregarded.

2.4. Governing Law. All questions pertaining to validity, interpretation, and administration of this Power shall be determined in accordance with the laws of California.

2.5. Explanation of Durable Power for Property Management. I understand that this Power is an important legal document. Before executing this document, my lawyer explained to me the following: (1) this document provides my attorney in fact with broad powers to dispose of, sell, convey, and encumber my related and listed patents both pending, issued and future; (2) the powers granted in this Power will exist for a period of Five (5) years time the powers granted in this Power will become effective upon my signature and the appointment of an attorney-in-fact pursuant to this Power will continue to exist for an indefinite period of time unless I limit the duration by the terms of this Power and/or revoke this Power, and they will continue to exist notwithstanding my subsequent Termination of the Power; and (3) I have the right to revoke or terminate this Power at any time.

2.6 Termination on Death. On my death, this Power shall terminate and my assets shall be distributed to the duly appointed personal representative of my estate; or, if no estate is being administered, to the persons who lawfully take the assets without the necessity of administration when they have supplied my attorney in fact with satisfactory documents as provided by law. This Durable Power of Attorney is executed by me on July 20, 2004, at San Jose, California.

STATEMENT OF \_\_\_\_\_

I, Jed Margolin, am the principal under a Margolin Durable Power of Attorney for Management

Dec 05 07 02:31p nikan

058-625-2460

p.6






---

**UNITED STATES PATENT AND TRADEMARK OFFICE**


---

UNDER SECRETARY OF COMMERCE FOR INTELLECTUAL PROPERTY AND  
DIRECTOR OF THE UNITED STATES PATENT AND TRADEMARK OFFICE

**\*700352578A\***

\*700352578A\*

DECEMBER 10, 2007

PTAS

OPTIMA TECHNOLOGY COPORATION (NV)  
C/O JOHN PETER LEE LIMITED  
830 LAS VEGAS BPULEVARD SOUTH  
LAS VEGAS, NEVADA 89101

UNITED STATES PATENT AND TRADEMARK OFFICE  
NOTICE OF RECORDATION OF ASSIGNMENT DOCUMENT

THE ENCLOSED DOCUMENT HAS BEEN RECORDED BY THE ASSIGNMENT DIVISION OF THE U.S. PATENT AND TRADEMARK OFFICE. A COMPLETE MICROFILM COPY IS AVAILABLE AT THE ASSIGNMENT SEARCH ROOM ON THE REEL AND FRAME NUMBER REFERENCED BELOW.

PLEASE REVIEW ALL INFORMATION CONTAINED ON THIS NOTICE. THE INFORMATION CONTAINED ON THIS RECORDATION NOTICE REFLECTS THE DATA PRESENT IN THE PATENT AND TRADEMARK ASSIGNMENT SYSTEM. IF YOU SHOULD FIND ANY ERRORS OR HAVE QUESTIONS CONCERNING THIS NOTICE, YOU MAY CONTACT THE EMPLOYEE WHOSE NAME APPEARS ON THIS NOTICE AT 571-272-3350. PLEASE SEND REQUEST FOR CORRECTION TO: U.S. PATENT AND TRADEMARK OFFICE, MAIL STOP: ASSIGNMENT SERVICES BRANCH, P.O. BOX 1450, ALEXANDRIA, VA 22313.

RECORDATION DATE: 12/05/2007

REEL/FRAME: 020218/0089  
NUMBER OF PAGES: 5

BRIEF: ASSIGNMENT OF ASSIGNOR'S INTEREST (SEE DOCUMENT FOR DETAILS).

ASSIGNOR:

MARGOLIN, JED BASED ON POWER OF  
ATTORNEY DATED JULY 20, 2004 TO:  
OPTIMA TECHNOLOGY CORPORATION  
(CA)

DOC DATE: 12/05/2007

ASSIGNEE:

OPTIMA TECHNOLOGY CORPORATION (NV)  
830 LAS VEGAS BOULEVARD SOUTH  
C/O JOHN PETER LEE LIMITED  
LAS VEGAS, NEVADA 89101

SERIAL NUMBER: 08513298

FILING DATE: 08/09/1995

PATENT NUMBER: 5566073

ISSUE DATE: 10/15/1996

TITLE: PILOT AID USING SYNTHETIC REALITY

020218/0089 PAGE 2

SERIAL NUMBER: 08587731 FILING DATE: 01/19/1996  
PATENT NUMBER: 5904724 ISSUE DATE: 05/18/1999  
TITLE: METHOD AND APPARATUS FOR REMOTELY PILOTING AN AIRCRAFT

SERIAL NUMBER: 09543252 FILING DATE: 04/05/2000  
PATENT NUMBER: 6377436 ISSUE DATE: 04/23/2002  
TITLE: MICROWAVE TRANSMISSION USING A LASER-GENERATED PLASMA BEAM WAVEGUIDE

SERIAL NUMBER: 09148045 FILING DATE: 09/03/1998  
PATENT NUMBER: 5978488 ISSUE DATE: 11/02/1999  
TITLE: SIMULATED AM RADIO

THERESA FREDERICK, EXAMINER  
ASSIGNMENT SERVICES BRANCH  
PUBLIC RECORDS DIVISION

02451

Dec 05 07 02:33p

nikan

12/05/2007  
700352578

858-625-2460

P. 1

Form PTO-1595 (Rev. 07/05)  
OMB No. 0951-0027 (exp. 6/30/2008)

U.S. DEPARTMENT OF COMMERCE  
United States Patent and Trademark Office

### RECORDATION FORM COVER SHEET PATENTS ONLY

To the Director of the U.S. Patent and Trademark Office: Please record the attached documents of the new address(es) below.

**1. Name of conveying party(ies)**  
Jed Margolin  
based on Power of Attorney dated July 20, 2004  
to: Optima Technology Corporation (CA)

**2. Name and address of receiving party(ies)**  
Name: Optima Technology Corporation (NV)  
Internal Address: c/o John Peter Lee Limited

Additional name(s) of conveying party(ies) attached?  Yes  No

**3. Nature of conveyance/Execution Date(s):**  
Execution Date(s) December 5, 2007  
 Assignment  Merger  
 Security Agreement  Change of Name  
 Joint Research Agreement  
 Government Interest Assignment  
 Executive Order 9424, Confirmatory License  
 Other

Street Address: 830 Las Vegas Boulevard South  
City: Las Vegas  
State: Nevada  
Country: U.S.A. Zip: 89101

Additional name(s) & address(es) attached?  Yes  No

**4. Application or patent number(s):**  
A. Patent Application No.(s)

This document is being filed together with a new application.

B. Patent No.(s)  
5,586,073  
5,904,724  
6,377,438  
5,978,488

Additional numbers attached?  Yes  No

**5. Name and address to whom correspondence concerning document should be mailed:**

Name: Optima Technology Corporation (NV)  
Internal Address: c/o John Peter Lee Limited  
Street Address: 830 Las Vegas Boulevard South

**6. Total number of applications and patents involved:** 4

**7. Total fee (37 CFR 1.21(h) & 3.41) \$180.00**

- Authorized to be charged by credit card
- Authorized to be charged to deposit account
- Enclosed
- None required (government interest not affecting title)

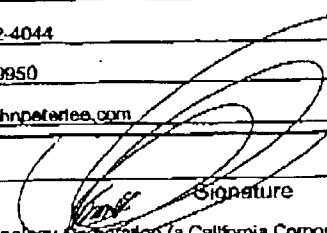
City: Las Vegas  
State: Nevada Zip: 89101  
Phone Number: 702-382-4044  
Fax Number: 702-383-9950  
Email Address: info@johnpeterlee.com

**8. Payment Information**

a. Credit Card Last 4 Numbers 1004  
Expiration Date 01/09

b. Deposit Account Number  
Authorized User Name

**9. Signature:**



12/5/2007  
Date

Optima Technology Corporation (a California Corporation)  
Name of Person Signing

Total number of pages including cover sheet, attachments, and documents: 7

Documents to be recorded (including cover sheet) should be faxed to (871) 273-0140, or mailed to:  
Mail Stop Assignment Recordation Services, Director of the USPTO, P.O. Box 1450, Alexandria, V.A. 22313-1450

OP \$160.00 5566073

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Dec 05 07 02:34p nikan  
NISSAN-SALES PROMOTION Fax:310-771-2073

858-625-2460  
Feb 16 2006 7:38 P.02

**Optima Technology**  
**Proprietary & Confidential**  
**Information**

THE POWERS YOU GIVE YOUR AGENT IN THIS DURABLE POWER OF ATTORNEY SHALL BECOME EFFECTIVE UPON THE DATE NOTED NEXT TO YOUR SIGNATURE AND WILL REMAIN IN EFFECT TO EXIST FOR FIVE (5) YEARS, UNLESS YOU STATE THAT THE DURABLE POWER OF ATTORNEY WILL LAST FOR A SHORTER PERIOD OF TIME OR UNLESS YOU OTHERWISE TERMINATE THE DURABLE POWER OF ATTORNEY.

YOU CAN AMEND OR CHANGE THIS DURABLE POWER OF ATTORNEY ONLY BY EXECUTING A NEW DURABLE POWER OF ATTORNEY OR BY EXECUTING AN AMENDMENT THROUGH THE SAME FORMALITIES AS AN ORIGINAL.

J.M.  
Initials

I, Jed Margolin, a resident located at 3570 Pleasant Echo, San Jose California, appoint Optima Technology Inc. - Robert Adams, CEO, residing at 2222 Michelson, Suite 1830, Irvine CA 92612, whose telephone number is 949-476-0515, as my attorney in fact, hereinafter referred to as "my attorney in fact". All references herein to "my attorney in fact" refer to the attorney in fact acting at the pertinent time. Optima Technology Inc. - Robert Adams, CEO, shall have full power and authority to act on my behalf under the terms of this power of attorney. This person shall act on their own direction and shall sign whenever execution by my attorney in fact is required.

I give my attorney in fact the powers specified in this Power with the understanding that they will be used for my benefit and on my behalf and will be exercised only in a fiduciary capacity.

ARTICLE ONE  
POWERS

1.1. Real and Personal Property. I give my attorney in fact the power to take any actions my attorney in fact believes necessary or desirable for the management or maintenance of my Patents, both issued and pending as well as future patents that I may develop which I own an interest when this Power is executed, or in which I later acquire an interest, including the power to acquire, sell, and convey ownership of property; control the manner in which property is managed, maintained, and used; change the form of title in which property is held; satisfy and grant security interests and other encumbrances on property; obtain and make claims on insurance policies covering risks of loss or damage to property; collect proceeds generated by property; except those acts that conflict with or are limited by a more specific provision in this Power.

1.2. Patent Securities. I give my attorney in fact the power to take any actions my attorney in fact believes necessary or desirable with respect to my patent securities that I own when this Power becomes effective, or that are required thereafter, including the power to purchase and sell patent securities; collect licensing fees, related royalties, and any other proceeds generated by patent securities; transfer title of patents and patent securities, except those acts that conflict with

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p. 5

NISSAN-SALES PROMOTION Fax:310-771-2073

Feb 16 2006 7:39

P.03

**Optima Technology**  
**Proprietary & Confidential**  
**Information**

or are limited by a more specific provision in this Power. For the purposes of this paragraph, the term "patent securities" includes only listed patents, both pending and issued to me personally.

**1.3. Claims and Litigation.** I give my attorney in fact the power to take any actions my attorney in fact believes necessary or desirable with respect to any claim that I may have or that has been asserted against me as it relates to said Patents and with respect to any legal proceeding in which I have an interest when this Power is executed, or in which I later acquire an interest, including the power to institute, prosecute, and defend legal proceedings and claims on my behalf; file actions to determine adverse claims, intervene in litigation, and act as amicus curiae in any proceedings affecting my interests; seek preliminary, provisional, or intermediate relief on my behalf; apply for the enforcement or satisfaction of judgments that have been rendered in my favor; participate fully in the development of claims and proceedings; submit any dispute in which I have an interest to arbitration; submit and accept settlement offers and participate in settlement negotiations; handle all procedural aspects, such as service of process, filing of appeals, stipulations, verifications, waivers, and all other matters in any way affecting the process of any claim or litigation; fully participate in any voluntary or involuntary bankruptcy proceeding involving me or in which I am a claimant; satisfy judgments that have been rendered against me; and perform any other acts.

**1.4 Enforce authority.** To seek appropriate court orders mandating acts that my attorney-in-fact deems appropriate if a third party refuses to comply with actions taken by my attorney-in-fact that are authorized by this instrument or enjoining acts by third parties that my attorney-in-fact has not authorized. In addition, my attorney-in-fact may sue a third party who fails to comply with actions I have authorized my attorney-in-fact to take and may demand damages, including punitive damages, on my behalf for such noncompliance. My attorney-in-fact is authorized to commence enforcement proceedings, at my expense, against any bank, financial institution, or other person or entity that fails or refuses to honor this durable power of attorney.

**1.5. Incidental Powers.** In connection with the exercise of any of the powers described in the preceding paragraphs, I give my attorney in fact full authority, to the extent that a principal can act through an agent, to take all actions that my attorney in fact believes necessary, proper, or convenient, to the extent that I could take such actions myself, including the power to prepare, execute, and file all documents and maintain records; enter into contracts; hire, discharge, and pay reasonable compensation to attorneys, accountants, expert witnesses, or other assistants; engage in litigation regarding a claim in favor of or against me; execute, acknowledge, seal, and deliver any instrument; and perform any other acts described as it relates to aid listed patents

**ARTICLE TWO**  
**GENERAL PROVISION**

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P.6

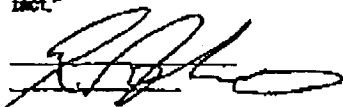
NISSAN-SALES PROMOTION Fax:310-771-2073

Feb 16 2006 7:40

P.04

**Optima Technology**  
**Proprietary & Confidential**  
**Information**

2.1. Signature of Attorney in Fact. Optima Technology Inc. - Robert Adams, CEO, when acting as my attorney in fact shall use the following form when signing on my behalf pursuant to this Power: " Jed Margolin by Optima Technology, Inc., c/o Robert Adams, CEO his attorney in fact."



Acceptance by Attorney in Fact

*Robert F. Adams*  
*Optima Technology*

Dated: *20 July 2004*

ACKNOWLEDGMENT

2.2. Photostatic Copies. Persons dealing with my attorney in fact may rely fully on a photostatic copy of this Power.

2.3. Severability. If any of the provisions of this Power are found to be invalid for any reason, such invalidity shall not affect any of the other provisions of this Power, and all invalid provisions shall be wholly disregarded.

2.4. Governing Law. All questions pertaining to validity, interpretation, and administration of this Power shall be determined in accordance with the laws of California.

2.5. Explanation of Durable Power for Property Management. I understood that this Power is an important legal document. Before executing this document, my lawyer explained to me the following: (1) this document provides my attorney in fact with broad powers to dispose of, sell, convey, and encumber my related and listed patents both pending, issued and future; (2) the powers granted in this Power will exist for a period of Five (5) years time the powers granted in this Power will become effective upon my signature and the appointment of an attorney-in-fact pursuant to this Power will continue to exist for an indefinite period of time unless I limit the duration by the terms of this Power and/or revoke this Power, and they will continue to exist notwithstanding my subsequent Termination of the Power; and (3) I have the right to revoke or terminate this Power at any time.

2.6 Termination on Death. On my death, this Power shall terminate and my assets shall be distributed to the duly appointed personal representative of my estate; or, if no estate is being administered, to the persons who lawfully take the assets without the necessity of administration when they have supplied my attorney in fact with satisfactory documents as provided by law. This Durable Power of Attorney is executed by me on July 20, 2004, at San Jose, California.

STATEMENT OF

I, Jed Margolin, am the principal under a Margolin Durable Power of Attorney for Management

Dec 05 07 02:35p nikan

858-625-2460

P.7

NISSAN-SALES PROMOTION Fax:310-771-2073

Feb 16 2006 7:40 P.05

**Optima Technology**  
**Proprietary & Confidential**  
**Information**

of Property and related Personal Affairs to said patents, which I am executing at the same time that I am executing this statement. I hereby acknowledge that I am fully aware of my rights in connection with this Margolin Durable Power of Attorney for Management of Property and related Personal Affairs to said patents and understand the applicable law and the consequences of signing or not signing this Margolin Durable Power of Attorney for Management of Property and related Personal Affairs to said patents, which have been substantively reproduced on Page 1 of this Margolin Durable Power of Attorney for Management of Patents also known as real Property and related Personal Affairs to said patents and which I have initialed. Executed on July 20, 2004, at San Jose, California.

Dated: 20 July 2004

Jed Margolin




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**UNITED STATES PATENT AND TRADEMARK OFFICE**


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UNDER SECRETARY OF COMMERCE FOR INTELLECTUAL PROPERTY AND  
DIRECTOR OF THE UNITED STATES PATENT AND TRADEMARK OFFICE

\*700352860A\*

\*700352860A\*

DECEMBER 11, 2007

PTAS

OPTIMA TECHNOLOGY CORPORATION (NV)  
C/O JOHN PETER LEE LIMITED  
830 LAS VEGAS BOULEVARD SOUTH  
LAS VEGAS, NV 89101

UNITED STATES PATENT AND TRADEMARK OFFICE  
NOTICE OF RECORDATION OF ASSIGNMENT DOCUMENT

THE ENCLOSED DOCUMENT HAS BEEN RECORDED BY THE ASSIGNMENT DIVISION OF THE U.S. PATENT AND TRADEMARK OFFICE. A COMPLETE MICROFILM COPY IS AVAILABLE AT THE ASSIGNMENT SEARCH ROOM ON THE REEL AND FRAME NUMBER REFERENCED BELOW.

PLEASE REVIEW ALL INFORMATION CONTAINED ON THIS NOTICE. THE INFORMATION CONTAINED ON THIS RECORDATION NOTICE REFLECTS THE DATA PRESENT IN THE PATENT AND TRADEMARK ASSIGNMENT SYSTEM. IF YOU SHOULD FIND ANY ERRORS OR HAVE QUESTIONS CONCERNING THIS NOTICE, YOU MAY CONTACT THE EMPLOYEE WHOSE NAME APPEARS ON THIS NOTICE AT 571-272-3350. PLEASE SEND REQUEST FOR CORRECTION TO: U.S. PATENT AND TRADEMARK OFFICE, MAIL STOP: ASSIGNMENT SERVICES BRANCH, P.O. BOX 1450, ALEXANDRIA, VA 22313.

RECORDATION DATE: 12/07/2007

REEL/FRAME: 020227/0287  
NUMBER OF PAGES: 2

BRIEF: ASSIGNMENT OF ASSIGNOR'S INTEREST (SEE DOCUMENT FOR DETAILS).

ASSIGNOR:

MARGOLIN, JED

DOC DATE: 12/05/2007

ASSIGNEE:

OPTIMA TECHNOLOGY CORPORATION (NV)  
830 LAS VEGAS BOULEVARD SOUTH  
C/O JOHN PETER LEE LIMITED  
LAS VEGAS, NEVADA 89101

SERIAL NUMBER: 08513298

FILING DATE: 08/09/1995

PATENT NUMBER: 5566073

ISSUE DATE: 10/15/1996

TITLE: PILOT AID USING SYNTHETIC REALITY

SERIAL NUMBER: 08587731

FILING DATE: 01/19/1996

PATENT NUMBER: 5904724

ISSUE DATE: 05/18/1999

TITLE: METHOD AND APPARATUS FOR REMOTELY PILOTING AN AIRCRAFT



020227/0287 PAGE 2

SERIAL NUMBER: 09543252

FILING DATE: 04/05/2000

PATENT NUMBER: 6377436

ISSUE DATE: 04/23/2002

TITLE: MICROWAVE TRANSMISSION USING A LASER-GENERATED PLASMA BEAM WAVEGUIDE

SERIAL NUMBER: 09148045

FILING DATE: 09/03/1998

PATENT NUMBER: 5978488

ISSUE DATE: 11/02/1999

TITLE: SIMULATED AM RADIO

MARCUS KIRK, EXAMINER  
ASSIGNMENT SERVICES BRANCH  
PUBLIC RECORDS DIVISION

02458

Form PTO-1595 (Rev. 07/05)  
OMB No. 0651-0027 (exp. 6/30/2008)

U.S. DEPARTMENT OF COMMERCE  
United States Patent and Trademark Office

### RECORDATION FORM COVER SHEET PATENTS ONLY

To the Director of the U.S. Patent and Trademark Office: Please record the attached documents or the new address(es) below.

<b>1. Name of conveying party(ies)</b> Jed Margolin based on Power of Attorney dated July 20, 2004 to: Optima Technology Corporation (CA)  Additional name(s) of conveying party(ies) attached? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<b>2. Name and address of receiving party(ies)</b> Name: <u>Optima Technology Corporation (NV)</u> Internal Address: <u>c/o John Peter Lee Limited</u>  Street Address: <u>830 Las Vegas Boulevard South</u>  City: <u>Las Vegas</u> State: <u>Nevada</u> Country: <u>U.S.A.</u> Zip: <u>89101</u>  Additional name(s) & address(es) attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>3. Nature of conveyance/Execution Date(s):</b> Execution Date(s) <u>December 5, 2007</u> <input checked="" type="checkbox"/> Assignment <input type="checkbox"/> Merger <input type="checkbox"/> Security Agreement <input type="checkbox"/> Change of Name <input type="checkbox"/> Joint Research Agreement <input type="checkbox"/> Government Interest Assignment <input type="checkbox"/> Executive Order 9424, Confirmatory License <input type="checkbox"/> Other		<b>4. Application or patent number(s):</b> <input type="checkbox"/> This document is being filed together with a new application. A. Patent Application No.(s)  B. Patent No.(s) <u>5,588,073</u> <u>5,904,724</u> <u>6,377,436</u> <u>5,978,488</u>  Additional numbers attached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<b>5. Name and address to whom correspondence concerning document should be mailed:</b> Name: <u>Optima Technology Corporation (NV)</u> Internal Address: <u>c/o John Peter Lee Limited</u>  Street Address: <u>830 Las Vegas Boulevard South</u>  City: <u>Las Vegas</u> State: <u>Nevada</u> Zip: <u>89101</u>  Phone Number: <u>702-392-4044</u> Fax Number: <u>702-383-8850</u> Email Address: <u>info@johnpetelee.com</u>		<b>6. Total number of applications and patents involved:</b> <u>4</u>  <b>7. Total fee (37 CFR 1.21(h) &amp; 3.41) \$</b> <u>160.00</u> <input checked="" type="checkbox"/> Authorized to be charged by credit card <input type="checkbox"/> Authorized to be charged to deposit account <input type="checkbox"/> Enclosed <input type="checkbox"/> None required (government interest not affecting title)	
<b>8. Payment Information</b> a. Credit Card Last 4 Numbers <u>1004</u> Expiration Date <u>01/09</u>  b. Deposit Account Number _____ Authorized User Name _____		<b>9. Signature:</b> <u>Jed Margolin by [Signature]</u> Signature <u>his Attorney in fact</u> Date <u>12/5/2007</u> Optima Technology Corporation (a California Corporation) Name of Person Signing	
		Total number of pages including cover sheet, attachments, and documents: <span style="border: 1px solid black; padding: 2px;">7</span>	

OP \$160.00 5566073

Documents to be recorded (including cover sheet) should be boxed to (571) 273-0140, or mailed to:  
Mail Stop Assignment Recordation Services, Director of the USPTO, P.O. Box 1450, Alexandria, V.A. 22313-1450

Dec 05 07 01:52p nikan

858-625-2460

P. 4

**Optima Technology Corporation**

8775 Costa Verde Blvd.  
Suite 501, San Diego CA 92122  
Phone: 775-450-6833  
Fax: 858-625-2460

December 5, 2007

United States Patent Office  
Patent Assignment Department

Fax: 571-273-0140

Subject: Assignment of Patents

Dear Sir,

Reference to our telephone conversation of today with Mr. Maurice please find herewith the information cover sheet and credit card payment form and the power of attorney from Mr. Jed Margolin to Optima Technology Corporation for four patents Numbers:

5,566,073  
5,904,724  
6,377,436  
5,978,488

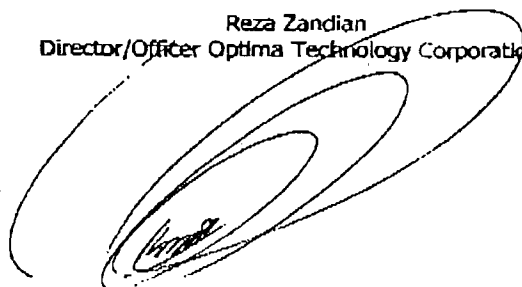
to be assigned to Optima Technology Corporation a Nevada Corporation with the Address:

Mr. John Peter Lee Esq.  
830 Las Vegas Boulevard South,  
Las Vegas NV 89101

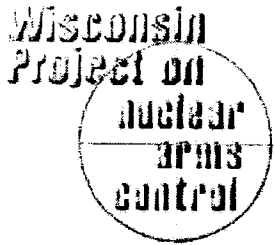
Thank you in advance for your co-operation, please call 775-450-6833 if you have any question.

Truly Yours

Reza Zandian  
Director/Officer Optima Technology Corporation



02460



## Iran: Shopping for Missile Technology

*The Risk Report*

Volume 3 Number 1 (January-February 1997)

About Us

Publications

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Although Iran has launched an aggressive effort to build long-range missiles, its success will depend almost entirely upon imports. According to a 1996 Pentagon study that ranks countries' military capabilities, Iran is unable to produce essential items such as radar, sensors, computers and specialized electronics on its own. Iran also lacks the ability to make solid fuel rocket propellant, guidance components, and design and testing equipment.

To make up for this lack of wherewithal at home, Iran has also launched an aggressive shopping campaign. "Iran doesn't like being dependent on outsiders for weapon supplies," says a U.S. official. To improve the navigation and guidance of its Scud missiles, which have poor accuracy, Iran is looking to buy inertial navigational systems and their components, which include gyroscopes, accelerometers, and radar systems. Iran now gets much of this equipment from China. In late 1996, Tehran and Beijing were negotiating a \$4.5 billion arms deal, which reportedly included the supply of Chinese multiple rocket launchers, missiles and missile launchers.

U.S. officials tell the Risk Report that Iranians are also shopping for missile components in the former Soviet Union. "We have no sense at the moment that a significant contribution is being made to Iran," says one official, "but Iranians are in Russia looking for missile technology, that much is true."

When unable to buy things legally, Tehran has been willing to smuggle sensitive products out of the United States and Europe. In 1988, Iran tried to import 286,000 pounds of ammonium perchlorate, an oxidizer used in solid-rocket fuel, from the United States. The American seller first shipped the cargo to Western Europe, where it was seized by Dutch police on its way to Iran.

In 1991, two businessmen who owned and managed a California company called Ray Amiri Computer Consultants were arrested for exporting to Iran restricted American equipment without a license. One of the men, a U.S. citizen of Iranian descent, was sentenced to a year in prison. The other, an Iranian citizen and permanent resident of the United States, fled to Iran while on bail. Their exports included oscilloscopes, logic analyzers and pulse generators, which were exported to the Iranian Ministry of Defense, the Iran Telecommunications Research Center and the Iran Telecommunications Manufacturing Company. The equipment was useful for developing missile guidance systems and monitoring nuclear weapons tests.

In 1993, U.S. federal agents arrested an Iranian citizen, Reza Zandian, and an

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American, Charles Reeger, for attempting to illegally export one of IBM's most powerful computers, the ES-9000, to Iran. The pair apparently operated through two small companies in southern California: Lucach Corporation/Computerworld and Iran Business Machines. Commerce Department officials were quoted by the press as saying that the ES-9000 would have been used for Iranian weapon development.

Because of the U.S. embargo against Iran, it is now illegal for U.S. persons to export most goods to Iran or to conduct business with Iranian companies. U.S. exports to Iran have fallen drastically during the past eighteen months. Nonetheless, Iranians continue to shop for American products. "Like most proliferators, Iran is opportunistic," a U.S. official says. "It will get as much stuff as possible and then see where the pieces fit best."

U.S. and European customs officials warn that the United Arab Emirates, and Dubai in particular, has become a favorite diversion point for hot cargoes to Iran. The German Ministry of Economics has warned German companies that Iran is increasingly using Dubai to obtain high technology, particularly electronic equipment. They say Iranians operating in Dubai have created a number of front companies which exist only as mailing addresses. [See related article: "Dubai is a Growing Diversion Risk, German Officials Say," Volume 2, Number 4 (July-August 1996).] When selling sensitive goods to the United Arab Emirates, exporters must pay close attention to the nationalities of the buyers. They may have an UAE address, but most of them are not UAE companies. And most shipments to Dubai, and to the Emirate's Jebel Ali Free Zone, are re-exported. If an American company knows its product will end up in Iran, the export is illegal.

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**Jed Margolin**

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**From:** "M. Lawrence Oliverio" [REDACTED] b(6)  
**To:** [REDACTED]  
**Sent:** Thursday, January 31, 2008 2:39 PM  
**Attach:** Bank Of America Deposition exhibits.pdf; Bank Of America Deposition.pdf  
**Subject:** Reza Zandian a/k/a G. Reza Jazi

Hi Brian,

We deposed the attorney whose client Mr. Zandian attempted to defraud by giving her/her client (Lazo trucking) a "copy" of a certified check for \$9,000 as alleged proof of Mr. Zandian's payment for trucking services. His purpose was to induce the trucking company to pick up 12 containers of equipment from the U.S. Customs service docks and truck the goods from Los Angeles to Nevada – without paying them. But rather, sending them a "copy" of a certified check that he never in fact sent to them.

In fact, Mr. Zandian took the check and deposited it into his own bank account while at the same time he was telling Lazo and their attorney that he had sent the check to them. The only way that Lazo could prove that Mr. Zandian was lying to them was to independently subpoena Bank of America who produced the actual deposit slips and the copy of the certified check that Mr. Zandian was purposely misrepresenting that he had sent to Lazo trucking.

This is "check fraud." Which in California is a felony.

Copies of the checks and the deposit slips and Bank of America's deposition is attached. We also have Lazo's attorney's sworn testimony at a deposition in support and verification of all of this and more including attempted insurance fraud by Mr. Zandian.

P.S. any word from the U.S. attorney's office?

**m lawrence oliverio** | rissman jobse hendricks & oliverio | 100 cambridge street, suite 2101 | boston, ma 02114  
direct [REDACTED] in: [REDACTED] | [REDACTED]

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2/3/08

CALIFORNIA  
DEPOSITION REPORTERS

When Every Word Counts...

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES

REZA ZANDIAN,	)	
	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CASE NO.: BC325137
	)	
LZAO TRUCKING EXPRESS, LTE	)	
FREIGHT SYSTEMS, AND DOES 1-100	)	
	)	
	)	
Defendants.	)	
	)	

DEPOSITION OF:	DAVID ROJAS
TAKEN BY :	SUSAN SALISBURY, ESQUIRE
Commencing :	10:30 A.M.
Location :	700 S. Flower Street
	Suite 1100
	Los Angeles, California
Day, Date :	Wednesday, September 7, 2005
Reported by :	NATALIE RODRIGUEZ, C.S.R. NO. 12851
Pursuant to :	Notice
Original to :	WITNESS

Pages 1 - 17

Job No. 95412

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ORIGINAL

APPEARANCES OF COUNSEL

FOR THE PLAINTIFF(S): GORDON & REES, LLP  
4675 MacArthur Court  
Suite 800  
Newport Beach, California  
(949) 255-6950  
BY: TARA L. MARTIN, ESQ.

FOR THE DEFENDANT(S): LAW OFFICES OF SUSAN SALISBURY  
8461 Drayer Lane  
Rosemead, California 91770  
(626) 307-1779  
BY: SUSAN D. SALISBURY, ESQ.

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I N D E X

WITNESS	PAGE
DAVID ROJAS	
Examination by Ms. Salisbury	4

EXHIBITS

DEFENDANT'S EXHIBIT NO.	DESCRIPTION	MARKED FOR IDENTIFICATION
1	Cashier's check dated 1/23/04	5
2	Personal check dated 1/23/04	5
3	Deposit ticket dated 10/1/04	5
4	Cashier's check dated 1/23/04	5

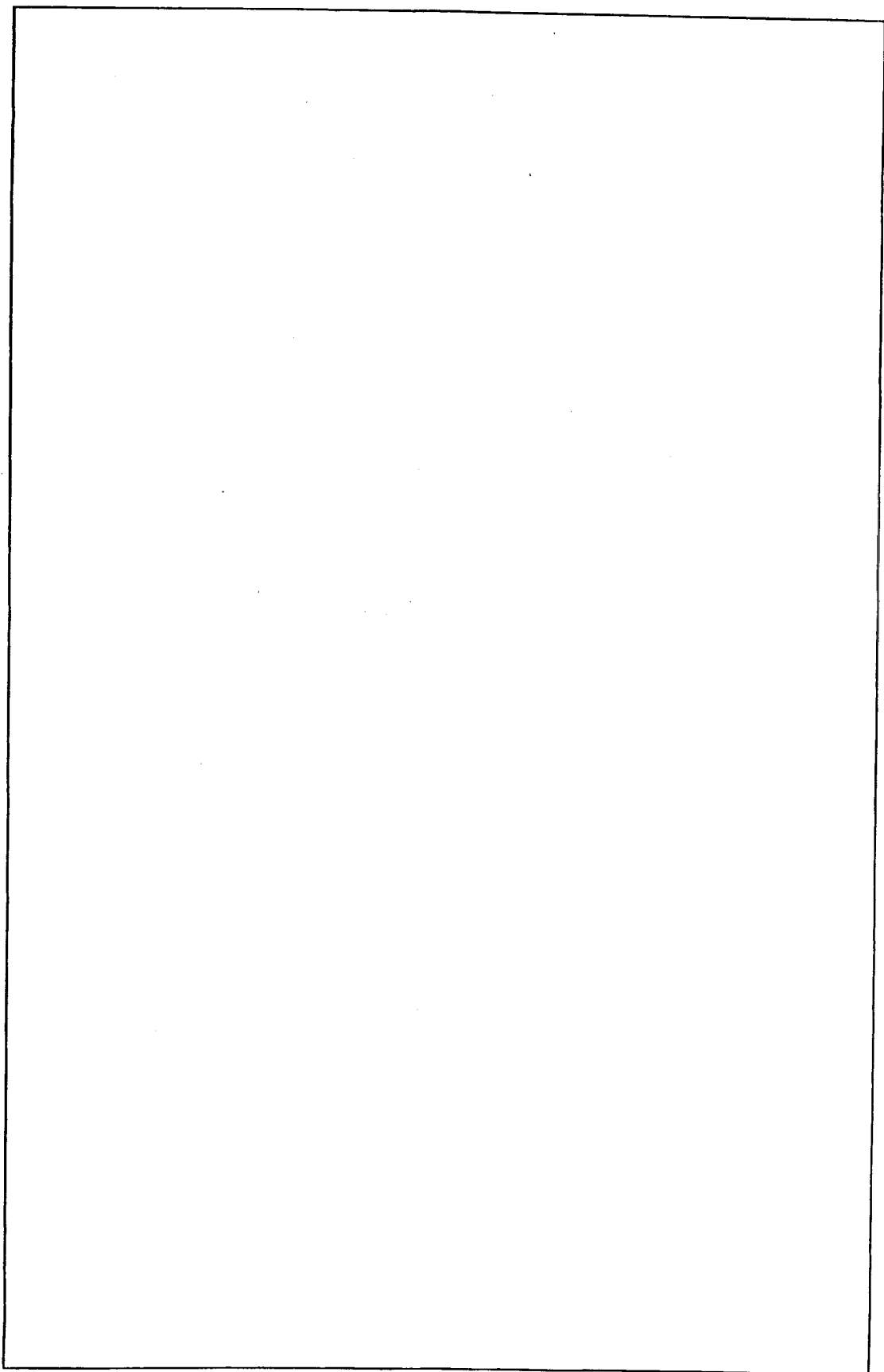
INFORMATION REQUESTED

(None)

QUESTIONS NOT ANSWERED

(None)

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1 LOS ANGELES, CALIFORNIA, WEDNESDAY, SEPTEMBER 7, 2005

2 10:30 A.M.

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6

DAVID ROJAS,

7

the witness herein, after having been duly sworn, was

8

deposed and testified as follows:

9

10

EXAMINATION

11

BY MS. SALISBURY:

12

Q Would you state your name and spell it for the

13

record.

14

A Sure. David Rojas, D-a-v-i-d, last name is

15

R-o-j-a-s.

16

Q And Mr. Rojas, my name is Susan Salisbury. I'm

17

an attorney, and you've been called as a witness in this

18

case called Zandian versus Lazo Trucking Express. And

19

we've asked you to come and testify concerning the

20

meaning of certain records that are in the possession of

21

Bank of America. So could you tell us what your job

22

title is?

23

A Yes. I actually -- vice president in charge of

24

our subpoena and levy department for Bank of America and

25

actually vice president in group operations manager as

1 well.

2 Q And you're employed by Bank of America,  
3 Mr. Rojas?

4 A Yes, I am.

5 Q And you brought with you certain documents.  
6 I'd like to -- they appear to be copies of a cashier's  
7 check. Could we mark those as one, two, three, and four,  
8 Exhibits 1, 2, 3, and 4. Now looking at page 1 and it  
9 says up at the top amount 9,000, sequence No. 2150982328.  
10 Would you tell us what this is?

11 A Yes. This is a cashier's check. Actually,  
12 it's the credit portion of the cashier's check for \$9,000  
13 made payable to the order of Lazo Trucking Services, and  
14 it was purchased by a -- looks like -- I can't make out  
15 the first letter, but a Reza, R-e-z-a, last name Jazi,  
16 J-a-z-i. It was purchased at the Fort Apache Sahara  
17 banking center in Phoenix -- correction.

18 (Defendant's Exhibit 1-4 were marked  
19 for identification by the court  
20 reporter and are attached hereto.)

21 Q Is that Las Vegas?

22 A I can't tell by the name if it's Phoenix,  
23 Arizona, but that's our standard name for cashier's  
24 checks that are processed out of the southwest. So I  
25 can't really tell if it was Las Vegas or not.

1           Q       Can you tell us what the capture date is? It  
2 says sequence number and capture date. What's the  
3 capture date?

4           A       Sure. The capture date is January 23, 2004.

5           Q       And what does that mean?

6           A       That was the date that this credit portion was  
7 processed by Bank of America.

8           Q       The credit portion is what the part where -- is  
9 that the part that you cash if you're the person who  
10 receives it?

11          A       No. Actually this is the portion -- this is  
12 the bank's copy. This is the copy that's processed by  
13 the bank, and that's denoted by -- in the lower  
14 right-corner there's a five preceding by -- actually have  
15 the zeroes and then the nine and the zeroes for \$9,000.  
16 This is the bank's copy.

17          Q       Okay. And can you tell us what the  
18 notations -- there's also a kind of gray area and it has  
19 some notations. Can you tell us what those notations  
20 are? Start with Bank of America something. There's some  
21 stamps or something on the back of the check.

22          A       This location here?

23          Q       Yes.

24          A       These would be Bank of America endorsements.  
25 These are actually put on the document when the credit

1 portion is processed by Bank of America, and these are  
2 actually obtained off of the computer sorters that  
3 actually physically process the document at the bank.

4 Q What does -- that just means that you now have  
5 a record that the check is outstanding; is that right?

6 A This is just the credit portion. It doesn't  
7 really reference the original check that was purchased.  
8 This just applies to the bank's credit portion.

9 Q So they just know they got \$9,000?

10 A Exactly.

11 Q Okay. Page 2, could you tell us what this is?  
12 It says -- looks like a personal check from G. Reza  
13 J-a-z-i?

14 A Right. This is a check that G. Reza Jazi used  
15 to basically purchase the cashier's check.

16 Q Okay. And can you tell us what the gray  
17 portion is on that page?

18 A I'm sorry?

19 Q The gray portion, can you tell us what that is?

20 A Yes. This is basically the information that  
21 the customer would have filled out when they purchased  
22 the check or deposit the check, excuse me. Bank of  
23 America is the one that deposited the check.

24 Q And where it says, for example, account 00497  
25 -- something, something, is that his account or what is

1 that? Do you see on page 2 on the back? Is that the  
2 back of the check?

3 A That's the back of the check, correct.

4 Q Okay. Do you see where a machine stamped  
5 something, official check sale? Do you know what that  
6 is?

7 MS. MARTIN: What are you referring to?

8 MS. SALISBURY: It's upside down. On the back  
9 of the check. It's upside down. And it says Tran 00109.  
10 What is that?

11 THE WITNESS: That's just the audit information  
12 that the bank prints on the check to denote what account  
13 number this was processed against.

14 Q BY MS. SALISBURY: Okay. Thank you. Now going  
15 to page 3, could you tell us what page 3 is?

16 A Page 3 is a deposit in the amount of \$9,000  
17 that was made by a G. Reza Jazi.

18 Q Yes.

19 A Located Las Vegas, Nevada. And the deposit was  
20 made on October 1 of 2004, like I mentioned in the amount  
21 of \$9,000.

22 Q And what is the gray piece on the bottom?

23 A There's several endorsements on the back of the  
24 deposit slip and those would denote that this deposit  
25 slip was processed by Bank of America.

1 Q And could you then look at page 4 and could you  
2 tell us what that is?

3 A Yes. This is the photocopy of a cashier's  
4 check for \$9,000 that G. Reza Jazi purchased, and this is  
5 the copy of the original check that was purchased at the  
6 Fort Apache Sahara banking center, and this check is  
7 payable to Lazo Trucking Services.

8 Q Can you tell who cashed the check?

9 A It just says not used for purpose intended, and  
10 I can't really make out that signature. So I have no  
11 idea.

12 Q Was -- can you tell if it was cashed by Lazo  
13 Trucking Services?

14 A Yes, it would have been.

15 Q How can you tell? Whose account was this  
16 deposited to?

17 A You know, I can't tell really. It has not used  
18 for purpose intended, so I have no idea why.

19 Q Could that be that Mr. Jazi deposited it --  
20 cashed it himself?

21 A Possibly.

22 Q Is that possible under your rules and  
23 regulations that if you get a cashier's check and you  
24 don't use it, that you can take it back and have it --

25 A I'm not familiar with the banking center



1 procedures so -- actually, my background is with the  
2 check processing, so I'm not familiar with that. I  
3 couldn't accurately tell you.

4 Q Okay. Up here on the left-hand side where it  
5 says account 252563581, is that the account to which it  
6 was deposited?

7 A Where are you referring to?

8 Q On page 4.

9 A Okay. You know, I don't know.

10 Q Okay. Who in your organization would know?

11 A This would be somebody from our banking center.

12 Q In Las Vegas?

13 A Or any Bank of America that works at a banking  
14 center.

15 Q Okay. But the signature on the back would have  
16 to be the signature of the person who cashed it?

17 A Absolutely, yes.

18 Q And do you know -- and it was not cashed until  
19 October 4, 2004. Can you tell from this where it was  
20 cashed?

21 A No, I cannot. No. It was cashed at a Bank of  
22 America, however, based on the endorsements on the gray  
23 shallow area of page 4. It was processed on October 1 of  
24 2004 by Bank of America.

25 Q Are there any notations on the back that show

1 what account it was deposited into?

2 A I can make out some numbers, but to be honest  
3 with you they're not very clear. So I can't really  
4 accurately tell you.

5 Q Calling your attention to page 3, and that's  
6 the deposit ticket; is that correct?

7 A That's correct.

8 Q For \$9,000.

9 A Right.

10 Q And does the deposit ticket normally show which  
11 checks are being deposited?

12 A Yes, it does.

13 Q Okay. And is there anything on that deposit  
14 ticket that tells you what check was being deposited?

15 A No, it does not. Let's see. Let me just  
16 review this for a second. Yes.

17 Q What account was it deposited to?

18 A Like I said, it was account number  
19 004967297981.

20 Q And from the deposit ticket it shows you that  
21 it's --

22 A How I determined that was by looking at page 3  
23 the upper endorsements, which is -- begins with 122000661  
24 below that third line down 10/01/04 and then it has below  
25 that -- it has a series of sequence numbers, 6960097453.

1 If you look at the cashier's check, you'll also notice  
2 that the sequence number endorsement on the back of the  
3 cashier's check in the gray area has the following  
4 number. In other words, it has the 6960097454. So that  
5 check would have been deposited into the account number  
6 that I mentioned earlier.

7 Q Along with the 9,000?

8 A Along with the 9,000.

9 Q It was the 9,000?

10 A Yes, it was.

11 Q So this would show that it was deposited into  
12 an account held in the name of G. Reza Jazi?

13 A That's correct.

14 Q Okay. No further questions. Ms. Martin?

15 MS. MARTIN: Nope. Nothing.

16 MS. SALISBURY: Okay. Thank you. We're done.

17 Let's stipulate that the -- let's go off the record for a  
18 second.

19 (A discussion was held off the record.)

20 MS. SALISBURY: Let's go back on the record.

21 It's stipulated that the court reporter will mail the  
22 original of the transcript to Mr. Rojas at his address,  
23 which is --

24 THE WITNESS: 1000 West Temple Street, Los  
25 Angeles, California 90012. And if you also include our

1 mail code which is CA9-705-05-07, and that will ensure  
2 that it gets to me.

3 MS. SALISBURY: Okay. And then if the -- the  
4 court reporter will include in that an envelope addressed  
5 to me. What you should do is read through your  
6 deposition if you see anything that was a mistake, make a  
7 note of it. She'll include a page for you to make notes  
8 by page and line number.

9 THE WITNESS: Okay.

10 MS. SALISBURY: You don't actually cross it out  
11 or anything like that. Just say if should have been when  
12 or what have you. Sign your deposition under penalty --  
13 there will be a place for you to sign under penalty of  
14 perjury, sign it, put it in the envelope, mail it to me.  
15 I will keep custody -- maintain custody of the deposition  
16 until such time as we need to use it at trial. And the  
17 court reporter is relieved of her statutory duties which  
18 conflict with the foregoing stipulation.

19 MS. MARTIN: The only thing I would add is that  
20 you advise me of any changes within 14 days.

21 MS. SALISBURY: And I will advise opposing  
22 counsel of any changes within 14 days.

23 MS. MARTIN: And in the event that the original  
24 is unavailable --

25 MS. SALISBURY: We can use a copy in place

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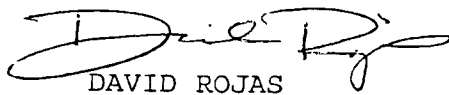
(The deposition proceedings  
were concluded at 10:49 a.m.)

PENALTY OF PERJURY CERTIFICATE

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I, the undersigned, declare under penalty of perjury that I have read the foregoing transcript, and I have made any corrections, additions or deletions that I was desirous of making; that the foregoing is a true and correct transcript of my testimony contained therein.

EXECUTED this 23<sup>rd</sup> day of September, 2005,  
at BANK OF AMERICA, 1000 W. Temple ST. LOS ANGELES, CA.  
90012

  
DAVID ROJAS

REPORTER'S CERTIFICATE

STATE OF CALIFORNIA )  
COUNTY OF LOS ANGELES ) ss.

I, NATALIE RODRIGUEZ, CSR No. 12851, a Certified Shorthand Reporter, certify;

That the foregoing proceedings were taken before me at the time and place therein set forth, at which time the witness was put under oath by me;

That the testimony of the witness, the questions propounded, and all objections and statements made at the time of the examination were recorded stenographically by me and were thereafter transcribed;

That the foregoing is a true and correct transcript of my shorthand notes so taken.

I further certify that I am not a relative or employee of any attorney of the parties, nor financially interested in the action.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct.

Dated this 21 day of September, 2005.



NATALIE RODRIGUEZ, CSR No. 12851

Witness  
name \_\_\_\_\_

Job #: \_\_\_\_\_ Job Date: \_\_\_\_\_

### TRANSCRIPT ERRATA SHEET

The reasons for making changes are as follows:

- (1) To clarify the record;
- (2) To conform to the facts;
- (3) To correct major transcription errors.

Page/Line	Change from	Change to	Reason

\_\_\_\_\_  
Signature of Deponent

Dated 0248 i





<b>A</b>	17:2,20 18:8,13 18:15 called 5:17,18 Calling 12:5 capture 7:1,2,3,4 case 1:7 5:18 cash 7:9 cashed 10:8,12,20 11:16,18,20,21 cashier's 3:15,17 6:6,11,12,23 8:15 10:3,23 13:1,3 CA9-705-05-07 14:1 center 6:17 10:6,25 11:11,14 certain 5:20 6:5 CERTIFICATE 16:1 17:1 18:1 Certified 17:5 18:1 18:7 certify 17:6,16 18:8 changes 14:20,22 charge 5:23 check 3:15,16,17 6:7,11,12 7:21 8:5 8:7,12,14,15,22 8:22,23 9:2,3,5,9 9:12 10:4,5,6,8,23 11:2 12:14 13:1,3 13:5 checks 6:24 12:11 clear 12:3 code 14:1 come 5:19 Commencing 1:15 computer 8:2 concerning 5:19 concluded 15:3 conflict 14:18 constitutes 18:9 contained 16:11 copies 6:6 copy 7:12,12,16 10:5 14:25 18:1 18:10 correct 9:3 12:6,7 13:13 16:11 17:14 17:20 18:10,13 correction 6:17 corrections 16:9 counsel 2:3 14:22 COUNTY 1:2 17:3 court 1:1 2:10 6:19 13:21 14:4,17 Covina 18:15 credit 6:12 7:6,8,25 8:6,8 cross 14:10 CSR 17:5,25 18:7	18:20 custody 14:15,15 customer 8:21 C.S.R 1:18	<b>D</b>	D 2:25 3:4 date 1:17 7:1,2,3,4 7:6 dated 3:15,16,16,17 17:22 David 1:14 3:7 5:6 5:14 16:20 18:10 day 1:17 16:13 17:22 18:15 days 14:20,22 declare 16:7 17:19 18:12 Defendants 1:10 Defendant's 3:14 6:18 DEFENDANT(S) 2:21 deletions 16:9 denote 9:12,24 denoted 7:13 department 5:24 deposed 5:8 deposit 3:16 8:22 9:16,19,24,24 12:6,10,13,20 deposited 8:23 10:16,19 11:6 12:1,11,14,17 13:5,11 deposition 1:14 14:6,12,15 15:2 18:9,10 DESCRIPTION 3:14 desirous 16:10 determined 12:22 discussion 13:19 document 7:25 8:3 documents 6:5 Drayer 2:22 duly 5:7 duties 14:17 D-a-v-i-d 5:14	<b>E</b>	E 3:4 earlier 13:6 employed 6:2 employee 17:17 endorsement 13:2 endorsements 7:24 9:23 11:22 12:23 ensure 14:1 envelope 14:4,14	ESQ 2:14,25 ESQUIRE 1:15 event 14:23 Exactly 8:10 examination 3:8 5:10 17:12 example 8:24 excuse 8:22 Executed 16:13 18:15 Exhibit 3:14 6:18 Exhibits 3:12 6:8 Express 1:8 5:18	<b>F</b>	familiar 10:25 11:2 filled 8:21 financially 17:17 first 6:15 five 7:14 Flower 1:16 following 13:3 follows 5:8 foregoing 14:18 16:8,10 17:7,14 17:20 18:9,13 Fort 6:16 10:6 forth 17:8 four 6:7 FREIGHT 1:8 further 13:14 17:16	<b>G</b>	G 8:12,14 9:17 10:4 13:12 go 13:17,20 going 9:14 GORDON 2:9 gray 7:18 8:16,19 9:22 11:22 13:3 group 5:25	<b>H</b>	held 13:12,19 hereto 6:20 honest 12:2	<b>I</b>	idea 10:11,18 identification 3:14 6:19 include 13:25 14:4 14:7 information 3:19 8:20 9:11 intended 10:9,18 interested 17:18	<b>J</b>	January 7:4	Jazi 6:15 8:14 9:17 10:4,19 13:12 job 1:25 5:21 J-a-z-i 6:16 8:13	<b>K</b>	keep 14:15 kind 7:18 know 8:9 9:5 10:17 11:9,9,10,18	<b>L</b>	L 2:14 Lane 2:22 Las 6:21,25 9:19 11:12 LAW 2:21 laws 17:19 18:12 Lazo 5:18 6:13 10:7 10:12 left-hand 11:4 letter 6:15 let's 12:15 13:17,17 13:20 levy 5:24 line 12:24 14:8 LLP 2:9 Located 9:19 location 1:16 7:22 look 10:1 13:1 looking 6:8 12:22 looks 6:14 8:12 Los 1:2,17 5:1 13:24 17:3 lower 7:13 LTE 1:8 LZAO 1:8	<b>M</b>	MacArthur 2:10 machine 9:4 mail 13:21 14:1,14 maintain 14:15 making 16:10 manager 5:25 mark 6:7 marked 3:14 6:18 Martin 2:14 9:7 13:14,15 14:19,23 mean 7:5 meaning 5:20 means 8:4 mentioned 9:20 13:6 mistake 14:6	<b>N</b>	N 3:4 name 5:12,14,16 6:15,22,23 13:12
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Amount: \$9,000.00  
Account: [REDACTED]  
Bank Number: [REDACTED]

Sequence Number: 2150982328  
Capture Date: 01/23/2004  
Check Number: 1237379

# CREDIT-CASHIER'S CHECK OUTSTANDING

No. 001237379

Notice to Purchaser - In the event this check is lost, misplaced or stolen, a sworn statement and 90-day waiting period will be required prior to replacement.

Date: JANUARY 23, 2004

91-170/1221

Banking Center: FORT APACHE SANARA

0008471 00010 1237379

G. REZA JAZI  
Remitter (Purchased By)

23-14-3774B 5-1999

Pay TO THE ORDER OF NINE THOUSAND DOLLARS AND 00 CENTS\*\*

To The Order Of SOLAZO TRUCKING SERVICES\*\*  
0000

\$ 9000.00\*\*

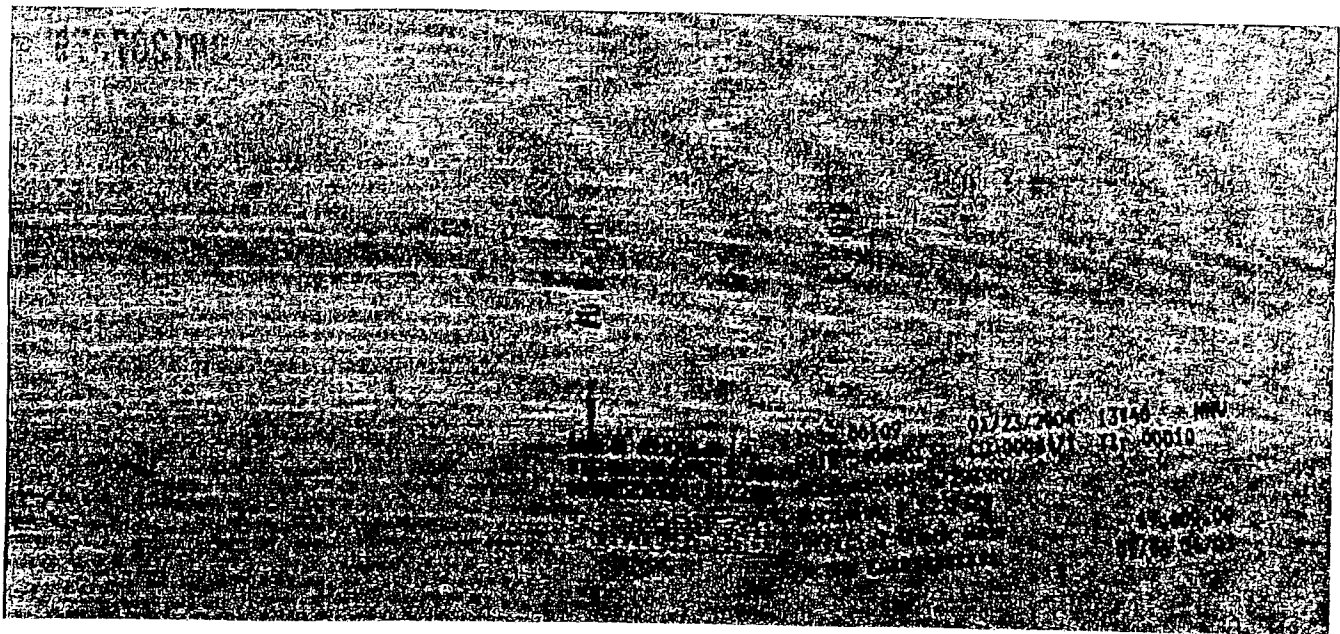
*[Handwritten Signature]*  
**NON-NEGOTIABLE**  
Authorized Signature  
Credit Copy

Bank of America, N.A.  
Phoenix, AZ

b(6)

[REDACTED] [REDACTED] [REDACTED]

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0248

EXHIBIT 1  
Deponent: RAVAS  
Date: 09/07 Rptr. NR  
WWW.DEPOBOOK.COM



Amount: \$9,000.00  
Account: [REDACTED]  
Bank Number: [REDACTED]

Sequence Number: 2150982329  
Capture Date: 01/23/2004  
Check Number: 345

G. REZA JAZI 07-03

345

[REDACTED] 2148

Date 1/23/04

94-72/1224 NY 6471

Pay to the order of

Bank of America

\$9000<sup>00</sup>

Nine Thousand

Dollars

Bank of America

ACH R/T 122400724

For

[REDACTED] 241: [REDACTED] 8 211 [REDACTED] 5 180000900000

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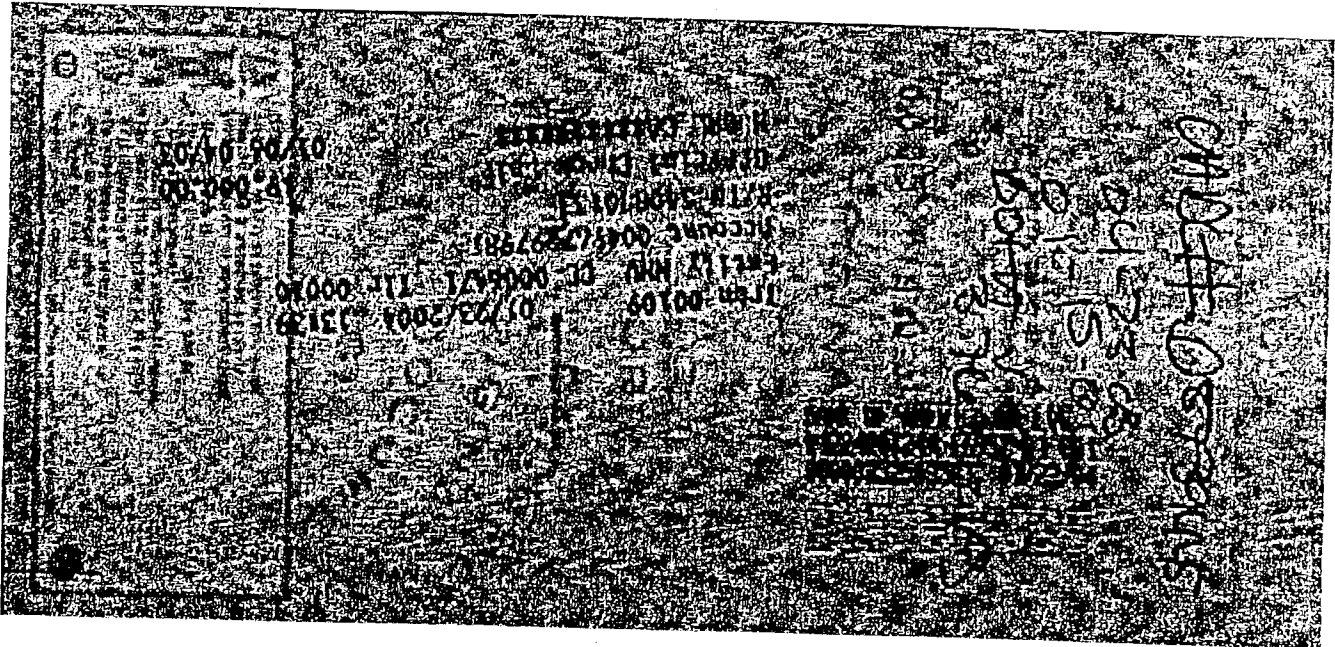


EXHIBIT 2  
Deponent: ROJAS  
Date: 9/7/05 Rptr. NY  
WWW.DEPOBOOK.COM

02489



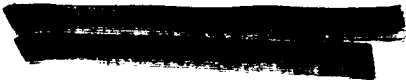
02490

Amount: \$9,000.00

Sequence Number: 6960097453

Capture Date: 10/01/2004

Check Number: 0



DEPOSIT TICKET

G. REZA JAZI 07-03

APT. 2148

DATE 10-1-04

DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

SIGN HERE IF CASH RECEIVED FROM DEPOSIT

Bank of America



ACH R/T 122400724

CASH  
94-72/1224 NW  
6471

TOTAL ITEMS  
SUBTOTAL  
LESS CASH

NET DEPOSIT

\$

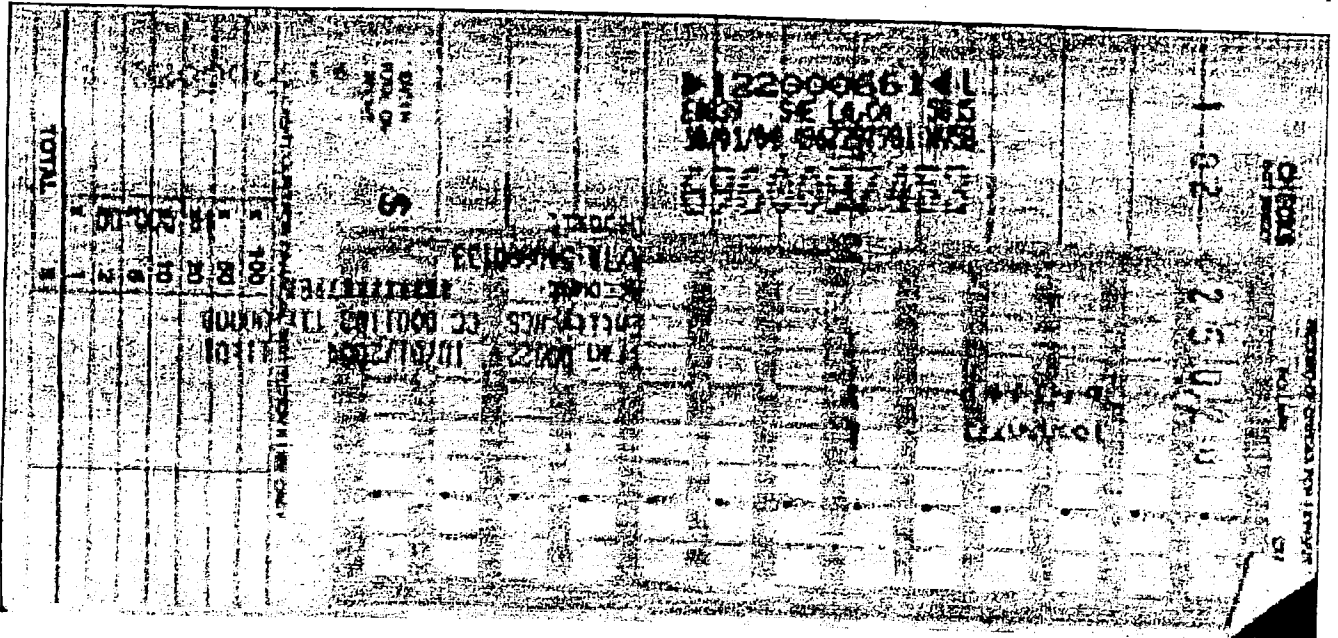
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02491

EXHIBIT 3  
 Deponent: ROJAS  
 Date: 9/7/05 Rptr. MR  
 WWW.DEPOBOOK.COM



Amount: \$9,000.00  
Account: [REDACTED] 1  
Bank Number: [REDACTED]

Sequence Number: 3250969502  
Capture Date: 10/04/2004  
Check Number: 1237379

**Bank of America.**

Cashier's Check

No. 001237379

Payable in Proportion - In the event this check is not cashed or cashed  
without endorsement and 90-day waiting period will be reduced prior to  
reference.

Banking Center: FORT APACHE SQUARE  
0006471 00010 1237379

Date: FEBRUARY 23, 2004

G. REZA JAZI  
Remitter (Purchased By)

8-1999  
Pay **\*\*NINE THOUSAND DOLLARS AND 00 CENTS\*\***  
To The Order Of **\*\*LAZO TRUCKING SERVICES\*\***  
0000

**\*\*9000.00\*\***  
*[Handwritten Signature]*  
Authorized Signature

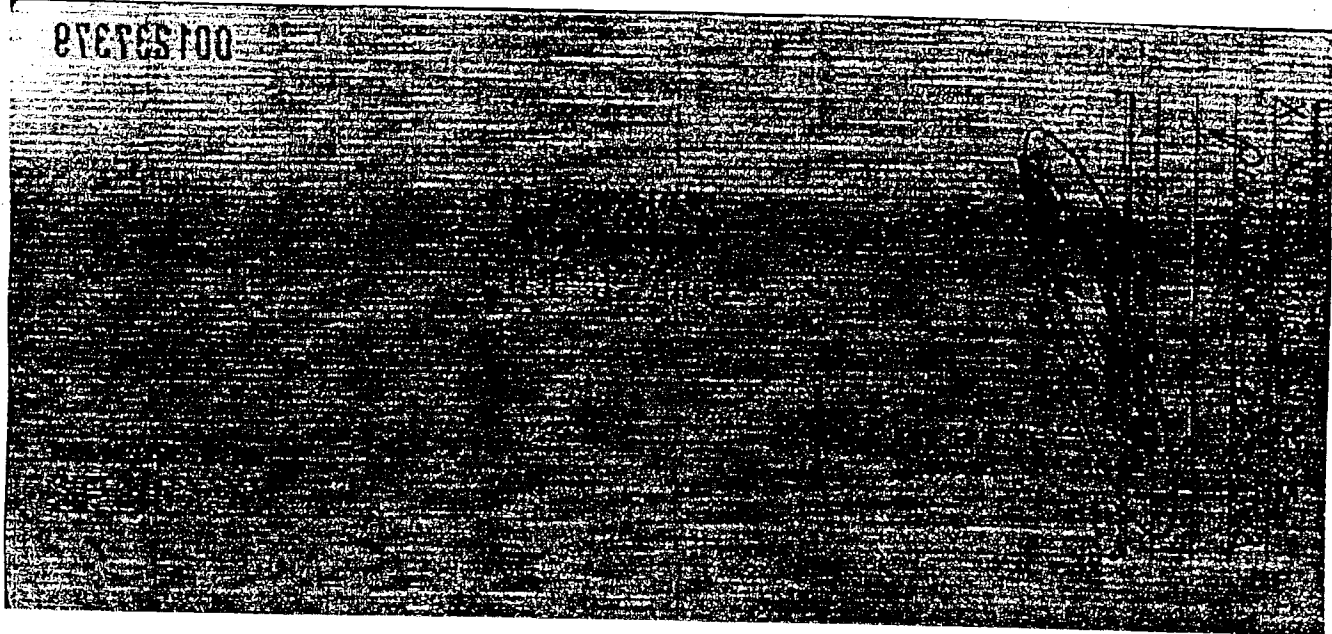
Bank of America, N.A.  
Phoenix, AZ

#0000900000#

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THE ORIGINAL DOCUMENT HAS REFLECTIVE WATERMARK ON THE BACK

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0249  
EXHIBIT 4  
Deponent: RONS  
Date: 9/7/05 Rptr: NR  
WWW.DEPOBOOK.COM

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UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

-----X

UNIVERSAL AVIONICS SYSTEMS	)	
CORPORATION,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	NO. CV-00588-RC
	)	
OPTIMA TECHNOLOGY GROUP, INC.,	)	
OPTIMA TECHNOLOGY CORPORATION,	)	
ROBERT ADAMS and JED MARGOLIN,	)	
	)	
Defendant.	)	

-----X

VIDEOTAPED TESTIMONY UNDER OATH OF  
SUSAN D. SALISBURY, ESQ.  
Santa Monica, California  
Friday, January 25, 2008

Reported by:  
SUSAN A. SULLIVAN, CSR #3522, California,  
JOB NO. 15108

Page 2

1  
2           January 25, 2008  
3           10:49 p.m.  
4  
5       VIDEOTAPED TESTIMONY UNDER OATH of SUSAN D  
6       SALISBURY, ESQ. taken by Defendants, at the  
7       offices of Hicks, Mims, Kaplan & Burns,  
8       2800 28th Street, Santa Monica, California,  
9       before Susan A. Sullivan, CSR, RPR, CRR,  
10       State of California.  
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Page 4

1           SUSAN D. SALISBURY, ESQ.  
2       THE VIDEOGRAPHER: This is the start of tape  
3       labeled Number 1 of the videotaped testimony of Susan  
4       Salisbury in the matter of Universal Avionics Systems  
5       Corporation v. Optima Technology Group, et al., in  
6       the United States District Court, District of  
7       Arizona, Case Number CV-0058-RC. This testimony is  
8       being taken at the offices of Hicks, Mims, Kaplan &  
9       Burns, located at 2800 28th Street, Suite 300, Santa  
10       Monica, California, on January 25th, 2008, at  
11       approximately 10:49 a.m. My name is Matthew Smith  
12       from TSG Reporting, Inc., and I'm the legal video  
13       specialist. The court reporter is Susan Sullivan in  
14       association with TSG Reporting.  
15       Will counsel please introduce yourself.  
16       MS. BURNS: Cara Burns of the firm Hicks, Mims,  
17       Kaplan & Burns on behalf of the defendants.  
18       THE VIDEOGRAPHER: Will the court reporter  
19       please swear in the witness.  
20  
21       SUSAN D. SALISBURY, ESQ.,  
22       called as a witness, having been duly sworn by  
23       the court reporter, was examined and testified as  
24       follows:  
25

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Page 3

1  
2           A P P E A R A N C E S:  
3  
4       HICKS, MIMS, KAPLAN & BURNS  
5       Attorneys for the Defendants  
6       2800 28th Street, Suite 300  
7       Santa Monica, California 90405  
8       BY: CARA R. BURNS, ESQ.  
9  
10  
11       Videographer:  
12       Matthew Smith  
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Page 5

1           SUSAN D. SALISBURY, ESQ.  
2       EXAMINATION BY  
3       MS. BURNS:  
4       Q Good morning, Ms. Salisbury. My name is  
5       Cara Burns and I'm here on behalf of the defendant,  
6       Optima Technology Group, in a matter that is pending  
7       in the District of Arizona, Federal District Court,  
8       Universal Avionics Systems Corporation versus Optima  
9       Technology Group, Inc., et al.  
10       Although you are an attorney, I would like  
11       to begin by stating that you are about to give sworn  
12       testimony and the testimony that you are about to  
13       give must be truthful. If you don't understand a  
14       question please ask me to rephrase it, otherwise  
15       anyone reading the transcript will assume that you  
16       understood the question. If you have any change to  
17       any answer, I — to the transcript or if you change  
18       your answer at trial I would have the right to read  
19       back your sworn testimony and comment or otherwise  
20       introduce it into evidence. Do you understand those  
21       admonitions?  
22       A I certainly do.  
23       Q Thank you. Let's just do a little bit about  
24       your background.  
25       Ms. Salisbury, what law school did you

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1 **SUSAN D. SALISBURY, ESQ.**

2 **graduate from?**

3 A University of Southern California.

4 **Q And what year did you graduate?**

5 A 1972.

6 **Q And do you specialize in any type of law?**

7 A I specialize in employment law. I represent  
8 a lot of community care residential facilities.

9 These are facilities that provide residential  
10 services for developmentally disabled adults. I also  
11 do business law, breach of contract, business torts  
12 such as trade, libel, that kind of thing, unfair  
13 business practices, and I do personal injury cases  
14 and a little bit of family law.

15 **Q Okay. And are you primarily a litigator?**

16 A Primarily.

17 **Q And where is your office?**

18 A My office is in Palmdale, California at  
19 38434 Ninth Street East.

20 **Q Thank you.**

21 **And are you admitted to practice law in  
22 California?**

23 A Yes, I am.

24 **Q Are you admitted anywhere else?**

25 A I am not admitted in any other state court,  
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1 **SUSAN D. SALISBURY, ESQ.**

2 I'm admitted in a large number of federal courts. Do  
3 you want me to go through the whole list?

4 **Q If you can.**

5 A United States Supreme Court, although I've  
6 never appeared there except as a tourist, the  
7 Northern, Central and Southern and Eastern Districts  
8 of California, the Third, Fifth, Sixth and Ninth  
9 Circuit Courts of Appeal, the District of  
10 Connecticut, Eastern District of Pennsylvania,  
11 Eastern District of Michigan, as I recall. I don't  
12 remember if that was pro hoc vici or if I was  
13 actually admitted, but I think I was admitted.

14 The -- I said Connecticut, I have been admitted, and  
15 then I've made appearances in a number of other  
16 courts --

17 **Q Thank you.**

18 A -- all over the country.

19 **Q Have you ever been suspended or disciplined?**

20 A Never.

21 **Q And when were you admitted to practice in  
22 the State of California?**

23 A December 14th, 1972.

24 **Q And over the course of your career**

25 **approximately how many depositions have you taken or**  
TSG Reporting - Worldwide 877-702-9580

1 **SUSAN D. SALISBURY, ESQ.**

2 **defended?**

3 A Probably five or 600.

4 **Q And are there any career highlights or legal  
5 highlights that you would like to mention?**

6 A Well, I worked for the EEOC. I started out  
7 as a labor lawyer working for Levy & Vanbourg which  
8 was at that time a big Los Angeles labor firm, went  
9 to work for EEOC, I was a special assistant to Tony  
10 Gallegos for a year and a half and actually  
11 personally know Clarence Thomas, not well, haven't  
12 seen him since. And then I worked for CIGNA  
13 Corporation doing, initially doing employment defense  
14 for nine years, came back to my California roots and  
15 did insurance defense for INA which was at that time  
16 a subsidiary of CIGNA. And then I took an early  
17 retirement and opened my own office which I have been  
18 doing ever since.

19 **Q When did you open your own office?**

20 A 1998.

21 **Q And what is your current hourly rate?**

22 A \$250 an hour.

23 **Q Ms. Salisbury, are you familiar with Reza  
24 Zandian, also known as Gholam Reza Zandian?**

25 A Yes.

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1 **SUSAN D. SALISBURY, ESQ.**

2 **Q And is he also known as Reza Jazi or J. Reza  
3 Jazi?**

4 A Apparently, yes.

5 **Q Okay. And how are you familiar with him?**

6 A He was involved with my client, Lazo  
7 Trucking.

8 **Q And when you say with your client, what do  
9 you mean? Did they do business together?**

10 A They, yes, unfortunately for them. Mr.  
11 Zandian -- well, this of course all hearsay but as  
12 related to me by my client, none of which is  
13 confidential because, of course, we presented it in a  
14 lawsuit that eventually happened, but basically their  
15 biggest customer is Evergreen which is a Chinese-  
16 owned shipping company.

17 **Q And let's just to make it clear, you are not  
18 waiving attorney-client privilege --**

19 A No.

20 **Q -- you were simply stating facts and issues  
21 that came up in a lawsuit and let me actually cut you  
22 off there and I apologize but when you say a lawsuit,  
23 what lawsuit are you referring to?**

24 A Zandian versus Lazo Trucking.

25 **Q Okay. And where was that case pending?**

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1           **SUSAN D. SALISBURY, ESQ.**  
 2     **A** In Los Angeles Superior Court.  
 3     **Q** **And approximately when was it pending?**  
 4     **A** 2004.  
 5           And what happened was that they were asked  
 6 to pick up some containers for somebody who was  
 7 supposedly having difficulty getting shipping done.  
 8     **Q** **By they you mean --**  
 9     **A** They, Lazo.  
 10          So Lazo is a small company and they did --  
 11 they agreed to get in touch with Mr. Zandian as a  
 12 favor to Evergreen.  
 13     **Q** **And Evergreen is, I apologize?**  
 14     **A** And Evergreen is a big -- they had these  
 15 containers in the port and they wanted to get the  
 16 cargo out of the containers and get their containers  
 17 back.  
 18     **Q** **Evergreen wanted to --**  
 19     **A** Evergreen.  
 20     **Q** **-- get their containers back.**  
 21     **A** And so in any event, so Lazo agreed to pick  
 22 up the containers. Originally it was supposed to be  
 23 13, one of the containers was so defective they  
 24 couldn't so it was 12. And they sent their rates,  
 25 they had first sent their rates to Mr. Zandian and he

1           **SUSAN D. SALISBURY, ESQ.**  
 2 said yes, your rates are fine.  
 3     **Q** **And, again, they being --**  
 4     **A** Being Lazo.  
 5     **Q** **Sent their rates to Mr. Zandian.**  
 6     **A** Correct. He said your rates are fine.  
 7           They went and picked up the containers and  
 8 had them in their yard, which is in Long Beach close  
 9 to the port. And then ensued what really was a  
 10 terrible nightmare for my clients which is that  
 11 they're trying to get, and to understand why it is  
 12 such a terrible nightmare you need to know something  
 13 about the trucking business, there's something called  
 14 demurrage and I just was looking at these documents,  
 15 forgotten that the rate of demurrage was \$44 a day.  
 16     **Q** **And by these documents, I apologize, let me**  
 17 **interrupt here and kind of break this down, these**  
 18 **documents you are referring to, you brought your**  
 19 **file?**  
 20     **A** I brought part of the file.  
 21     **Q** **Part of the file, excuse me.**  
 22     **A** Right.  
 23           And in that industry if you -- the person  
 24 who is responsible for demurrage is the trucker and  
 25 what that means is that the trucker has five days

1           **SUSAN D. SALISBURY, ESQ.**  
 2 usually from the date they pick up the container from  
 3 the port to return it empty to the port. After that  
 4 demurrage charges apply and in this case it was \$44 a  
 5 day per container, so there's a huge incentive for  
 6 everybody to get that container empty and to get it  
 7 back to the port. Now my client tells all of their  
 8 customers you are going to pay the demurrage if it is  
 9 your fault, we don't get the container back in time,  
 10 because demurrage charges, as you can see, add up  
 11 very, very quickly. So they got, they went and  
 12 picked up the containers and Mr. -- they said, "Where  
 13 do you want this stuff delivered to?"  
 14     **Q** **They being your client asked Mr. Zandian.**  
 15     **A** Right, right.  
 16           I asked Mr. Zandian, "Where do you want  
 17 these containers delivered to?" And he said,  
 18 "Las Vegas."  
 19           And Toni Baca of Lazo Trucking, and it is a  
 20 very small company, basically told Mr. Zandian we  
 21 needed an address and because they had looked at what  
 22 the cargo was it was obviously very heavy and they,  
 23 Lazo understood that it would require a crane to  
 24 remove the contents of the containers, get them off  
 25 the containers so that they could return them.

1           **SUSAN D. SALISBURY, ESQ.**  
 2           In any event, among the things that happened  
 3 was that Mr. Zandian gave Lazo the name of a  
 4 warehouse and crane company in Las Vegas. Toni  
 5 called that company, it was called Jake's Crane, and  
 6 was told that Jake's Crane had no agreement with Mr.  
 7 Zandian to accept any cargo. And I did end up, by  
 8 the way, taking the deposition of Harvey Matthis at  
 9 Jake's Crane and although Jake's Crane did sign a  
 10 contract with Mr. Zandian, Mr. Zandian never paid  
 11 them.  
 12           Now at this point demurrage changes are  
 13 beginning to apply because it has been more than five  
 14 days to just get an address in Las Vegas and  
 15 initially, according to my clients, Mr. Zandian told  
 16 Lazo just take these containers out into the desert  
 17 and I will tell you while they're on their way to  
 18 Las Vegas.  
 19           And my client replied to them that we don't  
 20 send 12 drivers with containers out into the desert  
 21 without an address and, in fact, we are not going to  
 22 send them all at once because we're not going to pay  
 23 waiting charges.  
 24           By that time they had accrued considerable  
 25 demurrage charges and they wanted to be paid up



1 SUSAN D. SALISBURY, ESQ.  
2 front. By this time Lazo was beginning to be very  
3 suspicious of Mr. Zandian and they wanted to be paid  
4 in advance. So Mr. Zandian negotiates, and by this  
5 time the standard initial price which he had agreed  
6 to up front would have come to something like I  
7 believe \$14,000. He negotiated a price of 10,000  
8 with Gracy.

9 Q And Gracy being?

10 A Gracy Lazo, who was the person who made  
11 those decisions for the company.

12 And then sent a fax copy of a check,  
13 cashier's check for \$9,000, even though the price he  
14 had negotiated with Gracy was 10,000. And then sent  
15 a letter or had someone on his behalf send a letter  
16 saying he is driving across the desert to deliver  
17 this check. Now you and I might think, well, golly,  
18 wouldn't it be a lot cheaper to just send it FedEx  
19 but this is the way Mr. Zandian operates.

20 So that check never arrived ever. And at  
21 this point Toni Baca and Gracy Lazo who are, by the  
22 way, sisters are telling Mr. Zandian that these  
23 containers are going nowhere so we're sending no  
24 drivers out into the desert until we have a check.  
25 The check never arrived and then Mr. Zandian's

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1 SUSAN D. SALISBURY, ESQ.  
2 telephone was disconnected and when Lazo tried to  
3 contact him at the address that he had given him in  
4 Las Vegas which was care of Image Line Graphics, the  
5 letter came back as undeliverable. So they are  
6 still; they, Lazo, are still incurring demurrage  
7 charges at \$44 per container per day which is six or  
8 \$700 per day and can't reach Mr. Zandian. They're  
9 trying to E-mail him and the E-mails are bouncing  
10 back, they're calling Evergreen and asking Evergreen  
11 do you know where Mr. Zandian is because we've got  
12 all this stuff and we can't get rid of it and the  
13 demurrage charges are piling up.

14 I believe that they waited almost a month  
15 without being able, without hearing from Mr. Zandian,  
16 without being able to locate Mr. Zandian, and at that  
17 point Gracy and Toni decided they had to get rid of  
18 this cargo so they could get the containers back to  
19 the port. And so they, Gracy and Toni, called in.  
20 First they had been told that it was a printing press  
21 of sorts so they tried to -- they called some people  
22 in who knew something about printing presses and were  
23 told it was useless equipment. They even called in  
24 someone who specializes in taking out-of-date  
25 equipment from the United States to Mexico and

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1 SUSAN D. SALISBURY, ESQ.  
2 selling it there. She told them that it was  
3 hopeless; that that printing press was so old and in  
4 such bad condition that there was no point to it, it  
5 was just junk.

6 And so Gracy and Toni found some basically  
7 scrap metal yards who unloaded the containers and  
8 paid them money and so that -- and that actually is a  
9 savings because they didn't have to pay anybody to  
10 unload them and then paid them I think it was around  
11 total between the two scrap metal yards around  
12 \$8,000 for the cargo. And I did -- they did take  
13 photographs and I gave you copies of those  
14 photographs and it is just basically junk.

15 In the meantime, Lazo had been contacted by  
16 something from the FBI, the Federal Bureau of  
17 Investigation, and interestingly when I took Mr.  
18 Matthis' deposition in Las Vegas he told me he also  
19 had been contacted by the agent from the Federal  
20 Bureau of Investigation and at that point Lazo  
21 learned that Mr. Zandian had been in trouble with  
22 Customs and Immigration because he had tried to  
23 export items to Iran which were -- he was forbidden  
24 to export, some kind of computers. And then Gracy  
25 and Toni had been questioned by the Federal Bureau of

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1 SUSAN D. SALISBURY, ESQ.  
2 Investigation in regard to the cargo because the FBI  
3 had some suspicion of Mr. Zandian as to whether he  
4 was using the cargos of what were basically junk  
5 metal to hide something more valuable that was not  
6 allowed to be imported and, of course, Gracy said we  
7 don't open the containers, we just ship them. We  
8 knew what was in there but we don't, other than that,  
9 we don't really get into it, we're not in the  
10 business of inspecting cargo.

11 So they -- as soon as they, within weeks, I  
12 mean, less than a month after they had disposed, Lazo  
13 had disposed of the cargo at a junkyard, two  
14 junkyards, Mr. Zandian got in touch with them all of  
15 a sudden, resurfaced, and wanted his cargo and  
16 claimed it was very valuable and that Lazo had  
17 destroyed his income and cost him all sorts of  
18 losses.

19 And then in September of 2004 apparently, I  
20 looked at some documents, I think it was in September  
21 of 2004 that my client first heard from Mr. Zandian's  
22 lawyer claiming that the cargo was for \$700,000 and  
23 then thereafter the lawsuit was filed. And he was  
24 initially represented by Marc Bresler, and I remember  
25 Mr. Bresler at one point saying to me that his client

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1 SUSAN D. SALISBURY, ESQ.  
 2 had paid for the cargo to be shipped and he said to  
 3 me, "As proof of that fact," he says, "I have a Xerox  
 4 copy of a cashier's check." And I responded to him  
 5 that my clients also had a certified copy of a, a  
 6 Xerox copy of a certified check but, unfortunately,  
 7 the bank requires the original if you want the funds  
 8 deposited to your account and they never received the  
 9 original. They kept getting these phone calls that  
 10 Mr. Zandian is coming across the desert with a \$9,000  
 11 check, but the \$9,000 check never arrived. And Mr.  
 12 Bresler insisted to me that my clients had received  
 13 the check.  
 14 I, after the lawsuit started I commenced  
 15 discovery with, written discovery with form  
 16 interrogatories and responses and requests for  
 17 production of documents and then Mr. Bresler withdrew  
 18 from the case and Mr. Zandian was not able to find  
 19 new counsel for another -- again, this happened a  
 20 while ago and I litigated a lot of cases so I don't  
 21 remember all the details but I think it was like four  
 22 or five months, enough to lull an experienced  
 23 litigator like me to think that the case was not  
 24 going to go to trial because Mr. Zandian didn't have  
 25 an attorney.

1 SUSAN D. SALISBURY, ESQ.  
 2 And then Mr. Zandian obtained an attorney  
 3 and so I took the deposition of Bank of America  
 4 because Mr. Zandian would not admit that he had not  
 5 delivered the check and Bank of America verified that  
 6 the check had been deposited to Mr. Zandian's  
 7 account, although it is under the other name you  
 8 mentioned. I think it is Reza Jazi instead of Reza  
 9 Zandian.  
 10 And I did some research during this time and  
 11 found out that Mr. Zandian uses a large, to me a  
 12 large number of different names. Apparently Reza is  
 13 short for Gholam Reza, and then I think that Jazi is  
 14 an extra name also and he uses different variations  
 15 of that name. And I also took Mr. Zandian's  
 16 deposition and he -- there were several things that  
 17 came out in that process. One was that I had asked  
 18 Mr. Zandian to produce documents showing that the  
 19 value of the equipment, because my clients insisted  
 20 that the equipment was really nothing but junk metal  
 21 which makes one wonder why you would pay to have  
 22 this, you know, 12 containers full of junk metal  
 23 transported across the Atlantic and the Pacific. It  
 24 is coming through the port of Long Beach and  
 25 supposedly was purchased in France.

1 SUSAN D. SALISBURY, ESQ.  
 2 And he produced a document which is appended  
 3 to his deposition which is a contract between a  
 4 company called EMFACO, E-M-F-A-C-O, and Reza Zandian.  
 5 Now I noticed the anomaly that Mr. Zandian's E-mail  
 6 address that he used for communicating with my  
 7 clients was emfaco@hotmail.com, did a little  
 8 research, found out it was a Swiss company. I don't  
 9 recall if I was able to determine if he was the  
 10 principal in that company from the Swiss corporate  
 11 website. They do have a website that's available  
 12 which can be accessed in English, I know I looked it  
 13 up, but I know at his deposition he admitted, I think  
 14 he claimed he was a 49 percent shareholder in EMFACO.  
 15 So basically -- so then I said, "Well, where  
 16 did EMFACO then, since you are a 49 percent  
 17 shareholder surely you know where they acquired it,"  
 18 and he said oh, yes, he knew where it was but he  
 19 couldn't remember and he couldn't remember who he  
 20 bought it from and he couldn't remember what he paid  
 21 for it.  
 22 I asked him about the customs documents and  
 23 one of those things that you have to do in order to  
 24 get anything imported into this country and even if  
 25 you are just bringing it in as a passenger on an

1 SUSAN D. SALISBURY, ESQ.  
 2 airplane, you have to fill out a statement as to what  
 3 the value of it is. And he had never produced that  
 4 document and it has to be produced or else the  
 5 equipment, whatever it is, doesn't come into the  
 6 country. And he couldn't remember who his freight  
 7 expediter was, he couldn't remember who filled out  
 8 the documents for bringing the equipment into the  
 9 country, he couldn't remember anything.  
 10 I did find out some of that information  
 11 through other means and we were getting ready to take  
 12 some depositions on that when we finally ended up  
 13 settling the case. But basically everything that Mr.  
 14 Zandian said, I came to the conclusion that if he  
 15 told the truth it was only if it was to his  
 16 advantage. He told pieces of the truth about  
 17 different things. And there was an immediate demand  
 18 early in the case that Lazo turn this over to their  
 19 cargo insurance carrier. And for a number of reasons  
 20 Lazo didn't want to do that and one of them was that  
 21 they had intentionally got rid of, they didn't  
 22 accidentally lose this cargo, they intentionally got  
 23 rid of it so that they could return it to -- they  
 24 could return the containers to Evergreen. And the  
 25 other reason was because their cargo insurance was --

1 SUSAN D. SALISBURY, ESQ.  
2 they already had several claims and their cargo  
3 insurance was already very high. And they felt that  
4 this was a completely cooked up claim and I had to  
5 say that I agreed with them.

6 The case was eventually settled for an  
7 amount that was less than it would have cost my  
8 clients to try the case, considerably less than the  
9 \$700,000 that Mr. Zandian claimed that the property  
10 was worth in the beginning. But the technique that  
11 Mr. Zandian uses here; for example, he claimed that  
12 he had a contract with Stratosphere, which is a  
13 casino in Las Vegas, to do their printing and through  
14 a company called Image Line Graphics.

15 Well, we tried to take the deposition of the  
16 owners of Image Line Graphics but they wouldn't --  
17 there was an office and an address and a name on the  
18 door but we couldn't get service on Image Line  
19 Graphics. The Stratosphere did indeed have a  
20 contract, but the cost of litigating a case like that  
21 simply gets beyond control when you look at -- if  
22 they're willing to settle for what they settled for,  
23 it is just cheaper to pay than the settlement.

24 Because at this point you are having to go, it is an  
25 out-of-state deposition which adds a lot to the cost,

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1 SUSAN D. SALISBURY, ESQ.  
2 they're paying for my travel cost and I don't charge  
3 a lot, but I don't really like Las Vegas, I don't  
4 know if that's an admission against interests, but I  
5 don't like to stay there overnight so I go in and go  
6 out. But still it gets to be expensive to -- and he  
7 seems to know how to make the claim such that he is  
8 going to run up the litigation cost. Because  
9 Stratosphere turns over, and I didn't go through all  
10 of those documents in reviewing, they turn over  
11 roughly, judging just from measuring the height of  
12 the documents, a thousand pages of contracts and  
13 correspondence with Image Line Graphics. But the tie  
14 between Image Line Graphics and Reza Zandian, if you  
15 try to look it up on the web, is just not there.

16 And then when I asked Mr., and I just had  
17 looked at his deposition again, I asked Mr. Zandian.  
18 He had claimed he was going to set this printing  
19 press up in Las Vegas and do major huge printing, you  
20 know, on a very large level, it was supposed to be a  
21 Lithoman or Heidelberg printing press, the kind of  
22 thing that you put out the kind of fliers that you  
23 would get from Ralphs or somebody like that, you  
24 know, hundreds of thousands of pages.

25 And I asked him where it was and he said it  
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1 SUSAN D. SALISBURY, ESQ.  
2 was on Wadsworth Avenue and what was the address, and  
3 he said it didn't have an address because it was  
4 empty land. Now, again, why are you bringing in an  
5 old machine, at best an old machine that you are  
6 supposedly going to set up in a building that you  
7 haven't even built yet? It just doesn't make any  
8 sense. And so I was certain that there was, that the  
9 whole thing was a put up job and there were repeated  
10 inquiries about insurance, sending the case to an  
11 insurance carrier, and I got the sense that Mr.  
12 Zandian had done this before, although I couldn't be  
13 sure about that because he uses so many different  
14 names.

15 And I did confirm, by the way, when my  
16 clients -- first when your client tells you this guy  
17 is being investigated by the FBI and Homeland  
18 Security you are skeptical and you think maybe your  
19 client is imagining things. So I went and looked it  
20 up on the web and lo and behold, he was at that point  
21 in time, I believe, or at least he was still on a  
22 list of people who were banned from exporting  
23 products. And the reason -- and there was a  
24 newspaper story that I was able to track down that  
25 because of his attempting to send computers to Iran.

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1 SUSAN D. SALISBURY, ESQ.  
2 And there was a development website that listed his  
3 name as a banned exporter along with I don't know how  
4 many other people. So he did seem to be kind of a --  
5 well, my clients -- my clients were not being  
6 paranoid and they were not imagining things.

7 So my experience with Mr. Zandian was  
8 extremely negative and I don't say that -- in fact, I  
9 still shake my head when I think about it. And the  
10 thing that was most incredible to me about all of  
11 this after my client basically settled, because they  
12 can't afford to fight, if they had been a big  
13 corporation like Evergreen and could afford to fight  
14 they probably would have. But Mr. Zandian called me  
15 and told me that he wanted to do, he thought we could  
16 do some business together. I don't remember exactly  
17 when that was. My client was making payments on this  
18 settlement and beyond my personal distaste for people  
19 who use the kind of tactics that Mr. Zandian had  
20 used, I thought that I also had a huge raging  
21 conflict of interest and I called and wrote to his  
22 attorney saying please instruct your client never,  
23 ever to contact me again ever. But it was incredible  
24 that he would think that that was an okay thing to  
25 do. To me that was incredible.

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1 SUSAN D. SALISBURY, ESQ.  
 2 So, of course, there are many, many more  
 3 details, and I don't know what more you might be  
 4 interested in.  
 5 **Q Okay. Well, you covered quite a bit and let**  
 6 **me right now kind of focus you on a few things.**  
 7 **First just to refresh your recollection and**  
 8 **just some cleanup detail, the lawsuit that you are**  
 9 **talking about is Zandian versus Lazo Trucking**  
 10 **Express, LTE Freight Systems, and Does 1 through a**  
 11 **hundred. What is the case number?**  
 12 A BC 325137.  
 13 And by the way, Lazo Trucking Express and  
 14 LTE Freight Systems were just two dbas at that point  
 15 in time for the same company.  
 16 **Q That's what I was going to ask.**  
 17 A They're the same company.  
 18 **Q And you represented, in essence, both.**  
 19 A Right.  
 20 **Q And what was the action actually about, if**  
 21 **you recall the causes of action?**  
 22 A It was, and I didn't bring the complaint  
 23 with me, but my recollection, it was for conversion  
 24 and for breach of contract.  
 25 **Q And was there a written contract?**  
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1 SUSAN D. SALISBURY, ESQ.  
 2 A At the plant that he hadn't built yet in the  
 3 desert.  
 4 **Q Did he ever produce a contract between his**  
 5 **company and the Stratosphere or between him**  
 6 **individually and the Stratosphere?**  
 7 A No.  
 8 **Q Did you ever send out a request for**  
 9 **production of documents where you asked for a**  
 10 **contract such as that?**  
 11 A I asked for all documents, yes, I did. I  
 12 asked for all documents that substantiate your  
 13 damages claim.  
 14 **Q But in response you did not receive any**  
 15 **document that reflected a contract between Mr.**  
 16 **Zandian or any dba or any company and the**  
 17 **Stratosphere?**  
 18 A Correct. I did get -- I got it from the  
 19 Stratosphere, I got a contract with Image Line  
 20 Graphics with the Stratosphere.  
 21 **Q Can you clarify that? When you say a**  
 22 **contract with Image Line Graphics, do you mean**  
 23 **between Zandian and Image Line, Stratosphere and**  
 24 **Image Line?**  
 25 A No, between the Stratosphere and Image Line.  
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1 SUSAN D. SALISBURY, ESQ.  
 2 A There was not, not in the sense that you  
 3 would conventionally think, but certainly, yes, there  
 4 was correspondence back and forth that would  
 5 constitute a written contract. There was an inquiry  
 6 from Mr. Zandian, there was faxing from Lazo to Mr.  
 7 Zandian here are our rates and then a return fax  
 8 saying your rates are acceptable to me, and in my  
 9 opinion that's a written contract.  
 10 **Q And the claim was for money damages. Do you**  
 11 **recall how much he was claiming?**  
 12 A My recollection is that he was claiming --  
 13 **Q I think you said before seven --**  
 14 A -- 700,000 is my recollection, yes.  
 15 **Q Some high number?**  
 16 A Very large number, yes. Approximately a  
 17 hundred times what it sold for at the junkyard.  
 18 **Q And damages besides the value of the**  
 19 **printing presses that he said were in the container,**  
 20 **were there any other damages that he said comprised**  
 21 **the several hundred thousand dollars worth of**  
 22 **damages?**  
 23 A He claimed that he had lost a contract with  
 24 the Stratosphere to print, to do printing for them.  
 25 **Q Did he --**  
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1 SUSAN D. SALISBURY, ESQ.  
 2 **Q Okay. But Stratosphere did not produce any**  
 3 **contract between Mr. Zandian?**  
 4 A I -- no, they did not. And I think I did  
 5 have a conversation with somebody at the Stratosphere  
 6 and they didn't know who he was. Again, my memory is  
 7 not really clear about that, but I do remember trying  
 8 to find out more information without having to impose  
 9 the cost of a deposition, another deposition on my  
 10 client. And I think that they really, if they knew  
 11 who he was, he was not the person that they were  
 12 doing business with.  
 13 **Q Okay. Ms. Salisbury, I would like to show**  
 14 **you a document.**  
 15 A Yes. Form interrogatories.  
 16 **Q Before I introduce this, Ms. Salisbury, do**  
 17 **you recognize this document?**  
 18 A Yes.  
 19 **Q And what is this document?**  
 20 A As you know, in California we have form  
 21 interrogatories that are produced by the judicial  
 22 council and you can just check boxes and you can  
 23 serve them on the other side.  
 24 **Q And do you recall checking the boxes and**  
 25 **having these served on the other side in the Zandian**  
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1 SUSAN D. SALISBURY, ESQ.  
 2 **versus Lazo matter?**  
 3 A Yes, I do.  
 4 MS. BURNS: I would like to introduce this as  
 5 Exhibit 1.  
 6 (Exhibit 1, a document, marked for  
 7 identification, as of this date.)  
 8 **Q BY MS. BURNS: Next I would like to**  
 9 **introduce or show you first a document labeled**  
 10 **"Response To Form Interrogatories." The caption has**  
 11 **Marc Bresler as the attorney serving you, and, Ms.**  
 12 **Salisbury, can you take a moment to review this**  
 13 **document.**  
 14 A Yes, uh-huh.  
 15 **Q And do you recognize this document?**  
 16 A Yes.  
 17 **Q And what is it?**  
 18 A It was Mr. Bresler's responses to the form  
 19 interrogatories.  
 20 MS. BURNS: Okay. I would like to introduce  
 21 this as Exhibit 2.  
 22 (Exhibit 2, a document, marked for  
 23 identification, as of this date.)  
 24 THE WITNESS: And I would note, I believe, yes,  
 25 the form interrogatories were served at the end of  
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1 SUSAN D. SALISBURY, ESQ.  
 2 attached a signature of Mr. Zandian but I don't see  
 3 that signature on either of these two documents.  
 4 MS. BURNS: Okay. We're going to call that last  
 5 document Exhibit 3.  
 6 (Exhibit 3, a document, marked for  
 7 identification, as of this date.)  
 8 **Q BY MS. BURNS: Actually if you could turn to**  
 9 **Page 4 of Exhibit 3, it has a cross-out of Mr.**  
 10 **Bresler's verification; is that right?**  
 11 A Right.  
 12 **Q Okay. But there is no verification by Mr.**  
 13 **Zandian?**  
 14 A I thought that Mr. Zandian did in fact sign  
 15 the second one. I -- perhaps it didn't get copied.  
 16 Let me see.  
 17 **Q Do you want to take a moment to go off the**  
 18 **record?**  
 19 A Sure.  
 20 THE VIDEOGRAPHER: The time is 11:28 a.m. and we  
 21 are now off the record.  
 22 (Recess)  
 23 THE VIDEOGRAPHER: The time is 11:34 a.m. We  
 24 are now on the record.  
 25 ///

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1 SUSAN D. SALISBURY, ESQ.  
 2 December and these responses so I must have given him  
 3 a one-month continuance. They would normally have  
 4 been due at the end of January and these came in  
 5 March. I think this came in March.  
 6 **Q BY MS. BURNS: Next I would like to show you**  
 7 **another document. Take a moment to review this**  
 8 **document.**  
 9 A Yes.  
 10 **Q It is labeled "Response To Form**  
 11 **Interrogatories" with Marc Bresler in the caption.**  
 12 **Take a moment to review this document.**  
 13 A Yes.  
 14 **Q And do you recognize this document?**  
 15 A Yes.  
 16 **Q And what is this document?**  
 17 A Mr. Bresler attempted to --  
 18 **Q Are these responses that you received in the**  
 19 **litigation?**  
 20 A Yes, these are responses that I received in  
 21 the litigation.  
 22 I think Mr. Bresler -- in California you are  
 23 required to verify the responses or sign under  
 24 penalty of perjury but both of these are signed by  
 25 Mr. Bresler and I thought there was one where he had  
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1 SUSAN D. SALISBURY, ESQ.  
 2 BY MS. BURNS:  
 3 **Q Ms. Salisbury, you took a look through the**  
 4 **files and did you find what you believed to be the**  
 5 **response to the first set of interrogatories**  
 6 **verification by Mr. Zandian?**  
 7 A Yes. And it is executed on March 16th,  
 8 2005.  
 9 **Q Okay.**  
 10 A And what had happened there is --  
 11 **Q Give me a moment here.**  
 12 **We're going to mark that document that you**  
 13 **are looking at as Exhibit 4.**  
 14 **(Exhibit 4, a document, marked for**  
 15 **identification, as of this date.)**  
 16 **Q BY MS. BURNS: I apologize. Please**  
 17 **continue.**  
 18 A What had happened was that Mr. Bresler  
 19 attempted to be the verifying person for these  
 20 interrogatory responses and I had told him that  
 21 attorneys cannot verify discovery responses and we  
 22 had a little conversation about that and he finally  
 23 got Mr. Zandian to sign.  
 24 **Q Now if I can turn you to a couple of points**  
 25 **here, you had mentioned something about Image Line**  
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1 SUSAN D. SALISBURY, ESQ.  
2 Graphics. Form Interrogatory 102.9 says, and this is  
3 on Exhibit 1, "State the name, address and telephone  
4 number of any person for whom you were acting as an  
5 agent or employee at the time of the incident." And  
6 Mr. Zandian wrote that he was actually a principal of  
7 Image Line graphics.

8 A 102.9?

9 Q 102.9.

10 A He says "None" in the answers. That's when  
11 he answered them, yes, right.

12 Q Okay. I'm sorry. I'm looking the, I guess  
13 the amended responses --

14 A Yes.

15 Q -- in Exhibit 3.

16 A Right.

17 Q What was his -- you had mentioned that  
18 Stratosphere claimed they had a contract with Image  
19 Line Graphics?

20 A My recollection is that they did have a  
21 contract with Image Line Graphics and I don't  
22 remember. They had a contract with somebody that  
23 was -- I think it was with Image Line Graphics but he  
24 was not in fact listed as a principal of Image Line  
25 Graphics in their corporate statement for the

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1 SUSAN D. SALISBURY, ESQ.

2 Secretary of State of Nevada. I mean, he was not  
3 listed as one of the people that owned it.

4 Q Do you recall -- excuse me. Can we go off  
5 the record for a second.

6 THE VIDEOGRAPHER: The time is 11:37 a.m. We  
7 are now off the record.

8 (Recess)

9 THE VIDEOGRAPHER: The time is 11:38 a.m. We  
10 are now on the record.

11 BY MS. BURNS:

12 Q Ms. Salisbury, you had just before we went  
13 off the record pointed out that in the plaintiff's  
14 response to the first set of form interrogatories  
15 which has been introduced as Exhibit 2 and was  
16 verified by his counsel, the response to 102.9 was  
17 "None" and then it was changed to that Mr. Zandian  
18 was the principal of Image Line Graphics; is that  
19 correct?

20 A Correct.

21 Q Okay. In response to Form Interrogatory  
22 107.1 which is in Exhibit 1, Property Damages, it  
23 says, "Itemize property damage and for each item  
24 state the amount or attach an itemized bill or  
25 estimate."

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1 SUSAN D. SALISBURY, ESQ.

2 In Exhibit 3, which would be response to  
3 form interrogatories which Mr. Zandian verified, can  
4 you please read his response.

5 A "Plaintiff's printing equipment valued in  
6 excess of \$700,000 was destroyed while in Defendant's  
7 custody and care."

8 Q Okay. And during the litigation did you  
9 ever receive any other amended or supplemental  
10 responses to the form interrogatories?

11 A No.

12 Q Were there any counterclaims filed in the  
13 lawsuit?

14 A I think that we may have counterclaimed for  
15 the storage costs. I don't recall at the moment.

16 Q You may have filed a cross-complaint?

17 A I don't recall. It doesn't look from the  
18 documents I looked at as if we did but I'm not sure.  
19 I think at that point Evergreen hadn't tried to  
20 collect any of those charges.

21 Q And you had mentioned before that  
22 depositions were taken during the litigation; is that  
23 correct?

24 A Yes.

25 Q I would like to introduce a document for you

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1 SUSAN D. SALISBURY, ESQ.

2 to take a look at.

3 A And there was a significant fact about Mr.  
4 Zandian's deposition that I had to bring a motion to  
5 compel and he -- I think I had set it twice and he  
6 didn't show up and then he got this other counsel.

7 Q I just gave you document that --

8 A David Rojas deposition from Bank of America.

9 Q Okay. And do you recognize this document?

10 A Yes.

11 Q Okay. And you just described it as the  
12 deposition of David Rojas; is that correct?

13 A Correct.

14 MS. BURNS: Let's mark this as Exhibit 5

15 (Exhibit 5, a document, marked for  
16 identification, as of this date.)

17 Q BY MS. BURNS: Ms. Salisbury, could you take  
18 a moment to review this document.

19 A Sure. Okay. Yes.

20 Q Ms. Salisbury, during the litigation of  
21 Zandian versus Lazo Trucking did you issue a subpoena  
22 for the testimony and records of Bank of America?

23 A Yes, I did.

24 Q And did Bank of America produce records?

25 A Yes, they did.

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1 SUSAN D. SALISBURY, ESQ.  
 2 **Q And did you also take the deposition of Bank**  
 3 **of America?**  
 4 A Yes, I did.  
 5 **Q Is that the deposition of David Rojas?**  
 6 A Yes, it is.  
 7 **Q Why did you issue a subpoena for the**  
 8 **deposition of Bank of America?**  
 9 A Because we were unable to get any admission  
 10 from Mr. Zandian about this \$9,000 check, cashier's  
 11 check, copies of which were being circulated, and the  
 12 claim was being made that he had actually paid to  
 13 have the cargo delivered with that \$9,000 check,  
 14 although he didn't explicitly make it under oath and  
 15 in writing other than to say that he had performed  
 16 all requirements of the contract. His attorneys were  
 17 making that statement that he had made and he makes  
 18 references to the check but he doesn't say I gave --  
 19 he doesn't ever explicitly say I gave them the check,  
 20 he makes it in such a way as to lead one to believe  
 21 that that's what he means.  
 22 For example, in the interrogatory answers he  
 23 said in 150.3 -- 150.2 he says, "Defendant agreed to  
 24 accept \$9,000 to render full performance," et cetera,  
 25 and then in 150.3 which asks for documents  
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1 SUSAN D. SALISBURY, ESQ.  
 2 substantiating that, he says, "A copy of bank check  
 3 made payable to Lazo Trucking." That would lead you  
 4 to believe, that would lead reasonable people to  
 5 conclude that the bank check had been given to  
 6 Defendant. He didn't actually say that and he never  
 7 did.  
 8 **Q Okay. And you are looking at Exhibit 3,**  
 9 **correct?**  
 10 A Yes, uh-huh.  
 11 **Q And those are the responses to the form**  
 12 **interrogatories that were verified by Mr. Zandian?**  
 13 A Yes.  
 14 **Q And the verification being Exhibit 4.**  
 15 A Yes.  
 16 And in responding in the way that he did  
 17 saying that -- where you are asking him to list  
 18 documents that would show he performed the contract,  
 19 and I will look at 150.2 again. 150.2, well, it  
 20 actually says, "Identify all documents," 150.1, "that  
 21 are part of the agreement." And then 150.2 is,  
 22 "State each part of the agreement not in writing,"  
 23 blah, blah, blah. 150.3, "Identify all documents  
 24 that evidence each part of the agreement."  
 25 One, when you get a copy of a check, that  
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1 SUSAN D. SALISBURY, ESQ.  
 2 usually means that you are trying to show that it was  
 3 paid to somebody.  
 4 **Q Okay.**  
 5 A So he is showing the check as evidence of  
 6 what the agreement was and -- but he doesn't ever  
 7 explicitly say, "I handed the check to them." But he  
 8 does it in such a way that reasonable people think  
 9 that that's what he means.  
 10 **Q Okay. Now you had reviewed the files you**  
 11 **brought with you and did not find the subpoena for**  
 12 **Bank of America, correct?**  
 13 A Correct.  
 14 **Q But you recall -- do you recall generally**  
 15 **what the subpoena for Bank of America requested them**  
 16 **to produce?**  
 17 A We asked them, it was very narrow, it had to  
 18 do with that check. We wanted to know what happened  
 19 to it.  
 20 **Q And how did you know what that check was?**  
 21 **Was a copy of that check produced by Mr. Zandian, was**  
 22 **a number produced, was some backup for that check**  
 23 **produced by Mr. Zandian? How did you know what that**  
 24 **check was?**  
 25 A My clients had a copy of it. He had faxed  
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1 SUSAN D. SALISBURY, ESQ.  
 2 it to them.  
 3 **Q Okay. So it was a document from Mr. Zandian**  
 4 **that had been sent to your client?**  
 5 A Correct. And Mr. Zandian had, I believe he  
 6 had somebody else call and say Mr. Zandian was  
 7 driving across the desert and he was going to deliver  
 8 this check and here is a copy of it so send out the  
 9 trucks. And my clients said no, we prefer to have  
 10 the actual check in our possession before we sent  
 11 trucks out across the desert. So they had a copy of  
 12 it but as I told Mr. Zandian's first attorney, the  
 13 bank won't let you cash that.  
 14 **Q Ms. Salisbury, you reviewed Exhibit 5 which**  
 15 **is the deposition of David Rojas?**  
 16 A Correct.  
 17 **Q And do you believe it to be a true and**  
 18 **accurate transcript of the deposition of David Rojas**  
 19 **produced by Bank of America?**  
 20 A Yes.  
 21 **Q Ms. Salisbury, if you could walk us through**  
 22 **generally what Mr. Rojas testified about the check**  
 23 **that Mr. Zandian claimed he had given to your clients**  
 24 **or he had faxed to your clients saying that he had**  
 25 **made the payment and they should take the services**  
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SUSAN D. SALISBURY, ESQ.

1 that they said they would provide.

2 A He produced a deposit ticket and he produced  
3 a copy of the check, front and back, showing where it  
4 had been deposited.

5 Q And he being Mr. Rojas?

6 A Mr. Rojas. And --

7 Q Is that Exhibit 1?

8 A Yes.

9 And basically calling your attention to Page  
10 13, this is where I -- I don't remember all the  
11 little details to get to that, I said to him, "In  
12 other words, so that check would have been deposited  
13 into the account number that I mentioned earlier,"  
14 and he said, "Yes."

15 And so I said, "So this would show it was  
16 deposited into an account held in the name of G. Reza  
17 Jazi," and he answered, "That's correct." And that  
18 was, G was, that was one of the names that Mr.  
19 Zandian used, G. Reza Jazi, and I think Mr. Zandian  
20 may have actually had signed the back, may have  
21 endorsed the back of the check, I don't recall.

22 Q Here is a lighter --

23 A No, he didn't. He did not endorse it. But  
24 there's a deposit slip and -- no, he did. It is

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SUSAN D. SALISBURY, ESQ.

1 Exhibit 2, shows the endorsement. And, no, I take  
2 that back, I'm sorry. Exhibit 2 was the check that  
3 he wrote to Bank of America to get the check. So it  
4 went back into the same account from which the money  
5 had been withdrawn in the first place which was the  
6 account of G. Reza. And Exhibit 2 was the check he  
7 wrote to Bank of America to get the certified check,  
8 certified funds, and then that money was eventually,  
9 that check, that certified check that he received was  
10 then redeposited to that same account and then we had  
11 copies, of course, of the certified check which was  
12 the check that Mr. Zandian faxed a copy of to my  
13 clients to -- and I think that's how we could prove  
14 that G. Reza Jazi and Zandian were the same person;  
15 that G. Reza Zandian purchased the check and got the  
16 money back into that account and the check in the  
17 interim was the check that had been faxed to my  
18 client. You can't fax a check, of course, but a copy  
19 of which had been faxed.

20 Q So Exhibit 2 is the check cut from Mr.  
21 Zandian under his -- under the name of G. Reza Jazi?

22 A Correct. And that was then used to purchase  
23 Exhibit 1 which was the cashier's check which shows  
24 remitter as G. Reza Zandian but which had been sent

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SUSAN D. SALISBURY, ESQ.

1 to my client and it is made payable to Lazo Trucking  
2 Services so that's how you make the connection  
3 between G. Reza Zandian and you have the fact that my  
4 client can identify this cashier's check, that they  
5 had received a copy of it by fax and it is made out  
6 to them. So G. Reza Jazi and Zandian are the same  
7 person.

8 Q And Exhibit 3?

9 A Yes.

10 Q That was a copy produced by Bank of America  
11 at the deposition.

12 A Right.

13 Q And Exhibit 3 to the deposition of Mr.  
14 Rojas.

15 A That's the deposit slip on October 2004  
16 where he is redepositing it back to the same account  
17 from which he originally wrote the check to purchase  
18 it on January 23rd of 2004. He is then redepositing  
19 it back into his account in October of 2004. And  
20 apparently there were numbers on the back of the  
21 check and whatever that confirmed that that's the  
22 account to which it was deposited and that's the  
23 deposit slip to that account. So at that point we  
24 had proved that Mr. Zandian basically, that the check

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SUSAN D. SALISBURY, ESQ.

1 probably never left his possession and that he was  
2 trying to give the impression that he had paid.

3 MS. BURNS: Let's go off the record for a  
4 minute.

5 THE VIDEOGRAPHER: The time is 11:53.m. We are  
6 now off the record.

7 (Recess)

8 THE VIDEOGRAPHER: The time is 12:27 p.m. We  
9 are now on the record.

10 BY MS. BURNS:

11 Q Ms. Salisbury, in the litigation did Mr.  
12 Zandian claim to have sent a cashier's check made  
13 payable to your client, Lazo Trucking Services, in  
14 the amount of \$9,000?

15 A He did not himself personally claim that,  
16 his attorney made representations, said to me that my  
17 client had been paid to deliver the containers and  
18 had kept the money and that's when we had that  
19 conversation. But, of course, I was not in contact  
20 with Mr. Zandian personally.

21 Q Right. Exactly.

22 And when did his attorney make this  
23 representation to you?

24 A I don't remember the dates. It was early in

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1 SUSAN D. SALISBURY, ESQ.  
 2 the litigation is all I recall.  
 3 **Q And this was an oral conversation?**  
 4 A Yes. And then, of course, I had a letter  
 5 from him claiming that the \$9,000 had been tendered.  
 6 **Q I would like for you to review this two-page**  
 7 **document dated September 16, 2004. The letterhead is**  
 8 **Marc Bresler. Take a moment to review that document.**  
 9 A Yes.  
 10 **Q Do you recognize this document?**  
 11 A Yes. It is a copy of a document that my  
 12 clients forwarded to me after Mr. Bresler had been in  
 13 touch with them.  
 14 **Q Okay. And what does Mr. Bresler say in this**  
 15 **document?**  
 16 A He said in the, I think it is the fourth  
 17 paragraph, "My client tendered a cashier's check for  
 18 \$9,000 to cover the contract and any other costs. I  
 19 understand that after you were in possession of the  
 20 containers that my client was pressured to pay extra  
 21 fees."  
 22 MS. BURNS: Okay. And I would like to introduce  
 23 this as Exhibit 6.  
 24 (Exhibit 6, a document, marked for  
 25 identification, as of this date.)  
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1 SUSAN D. SALISBURY, ESQ.  
 2 right now which is the, it says it is the deposition  
 3 of Reza Zandian taken on September 9, 2005, if you  
 4 can take a moment to review that document.  
 5 A Okay. It is a very long document. It is  
 6 125 pages. No, I'm sorry, it is 151 pages.  
 7 **Q And this is from your files in the matter of**  
 8 **Zandian versus Lazo Trucking, correct?**  
 9 A Yes.  
 10 **Q Have you ever reviewed the transcript?**  
 11 A After -- I reviewed portions of it recently  
 12 but not really in depth.  
 13 **Q Okay. When the litigation was going on you**  
 14 **reviewed the transcript, correct?**  
 15 A Yes, I did.  
 16 **Q Okay. And do you believe it to be a true**  
 17 **and accurate transcript of the Bank of America**  
 18 **deposition?**  
 19 A Yes.  
 20 **Q Excuse me, of the deposition of Mr. Zandian.**  
 21 A Yes. It has been in my file that entire  
 22 time.  
 23 **Q Perfect. Thank you.**  
 24 **I would like to introduce this as Exhibit 7.**  
 25 ///

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1 SUSAN D. SALISBURY, ESQ.  
 2 **Q BY MS. BURNS: Besides this letter, Mr.**  
 3 **Bresler also orally represented to you that his**  
 4 **client had paid the \$9,000 to your client.**  
 5 A Correct. And he and I disputed that and he  
 6 said, "I have a Xerox copy of the cashier's check,"  
 7 and that's when I told him my clients also had a  
 8 Xerox copy of a cashier's check, but what they never  
 9 had was the cashier's check.  
 10 **Q Did he ever say that the check had been**  
 11 **cashed by your client?**  
 12 A I don't remember if he used those exact  
 13 words but he said, "Well, why" -- something to that  
 14 effect. "Why would we" -- you know, "Why would they  
 15 have the copy if they hadn't received it?" And I  
 16 then told him the story about Mr. Zandian faxing a  
 17 copy of the check and -- but never actually  
 18 delivering it or bringing it to their office.  
 19 **Q So Mr. Bresler was trying to prove his point**  
 20 **that your client had cashed the \$9,000 check.**  
 21 A Correct. Because he assumed from the fact  
 22 that there was a copy of it, that it had been  
 23 delivered.  
 24 **Q Next I would like for you to review --**  
 25 **actually this deposition that you are looking at**  
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1 SUSAN D. SALISBURY, ESQ.  
 2 (Exhibit 7, a document, marked for  
 3 identification, as of this date.)  
 4 **Q BY MS. BURNS: Ms. Salisbury, you, of**  
 5 **course, conducted that deposition; is that correct?**  
 6 A Yes, I did.  
 7 **Q And Mr. Lazo had counsel at that deposition?**  
 8 A Mr. Zandian.  
 9 **Q Excuse me, Mr. Zandian.**  
 10 A Yes. Tara Martin.  
 11 **Q And is Ms. Martin affiliated with Marc**  
 12 **Bresler?**  
 13 A No. She was new counsel, Gordon Reese was  
 14 the law firm, and they had substituted in in August  
 15 of two thousand, I guess it was 2005. So --  
 16 **Q Is there anything in particular that you**  
 17 **remember about the deposition of Mr. Zandian?**  
 18 A It was one of the most frustrating  
 19 depositions I have ever taken because Mr. Zandian  
 20 made such outlandish claims and, of course, he didn't  
 21 recall things. He didn't want to tell me where he  
 22 lived, he didn't recall things. One of the issues  
 23 that I was trying to establish was what the real  
 24 value of this junk that was in the containers was and  
 25 it seems to me pretty incredible that a man can claim

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1 SUSAN D. SALISBURY, ESQ.  
2 that he spent, I don't remember what that contract  
3 was for, 320,000 or whatever, that you spent \$320,000  
4 for a printing press and you can't remember who you  
5 bought it from or where you bought it except, I mean,  
6 the answer was France. That you have to sign a  
7 declaration of value -- oh, I take that back.

8 He actually said the price was 1,250,000  
9 euros for the printing system.

10 **Q And you are looking right now at a --**

11 A I'm looking at Exhibit A to the deposition  
12 which he had produced as proof of what the value of  
13 the cargo was and it purports to be a purchase and  
14 sale of equipment and services between EMFACO and  
15 Zandian and then you figure out that in fact it is  
16 Zandian, so it is really a sale from himself to  
17 himself.

18 **Q And did Mr. Zandian admit during the  
19 deposition that, I'm sorry, ZAMCO?**

20 A E-M-F-A-C-O.

21 And then he also claimed EMFACO, by the way,  
22 owned Optima Technologies which was interesting in  
23 light of what the Secretary of State thinks but  
24 that's okay.

25 He admitted that he owned 49 shares in  
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1 SUSAN D. SALISBURY, ESQ.  
2 EMFACO and I had established, I guess, that there  
3 were only a hundred shares outstanding in the  
4 corporation and you can do that kind of thing but  
5 then at that point, you know, when you say to  
6 somebody where did you buy this and he says in France  
7 and you say well, where in France and he can't really  
8 answer the question, it is very, very frustrating.

9 And then other things, for example, just  
10 looking through the first few pages, he had claimed  
11 that he was acting, in his Answers to Interrogatories  
12 he claimed that he was acting as an agent of Image  
13 Line Graphics when he bought the equipment so at his  
14 deposition I asked him about -- I asked him about  
15 Image Line Graphics and I said, I asked him:

16 "Image Line Graphics" -- this is on Page  
17 15 -- "is one of your businesses; is that right?"

18 "A It is not one of my businesses, but I  
19 had an association with them."

20 Now he has claimed he was acting on their  
21 behalf.

22 And then I say:

23 "Whose business was it?"

24 "It was Mr. Farahi's business."

25 "And where is he located?"

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1 SUSAN D. SALISBURY, ESQ.

2 "In Las Vegas."

3 "And what's his address in Las Vegas?"

4 "I don't recall."

5 **Q So he was claiming that Image Line Graphics  
6 was Mr. --**

7 A Farahi's business, not his business.

8 **Q But he has no idea about the gentleman?**

9 A But he doesn't know where, yeah, he doesn't  
10 have an address for him.

11 And "Is it a business that's still in  
12 business," I asked him.

13 He says, "I don't know."

14 Now he is claiming millions of dollars in  
15 damages where he was supposedly acting on behalf of  
16 this business and he doesn't know if they're still in  
17 business and he doesn't know what their address is.

18 **Q You mean hundreds of thousands of dollars?**

19 A Well, I don't -- he is saying that -- he may  
20 not be claiming a million dollars. He is saying he  
21 suffered many millions of dollars for the contracts  
22 that he lost that Image Line had with Stratosphere,  
23 and yet he can't give you the address of the  
24 business.

25 **Q Was he also claiming that other -- let me**

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1 SUSAN D. SALISBURY, ESQ.

2 **just finish here.**

3 **Was he also claiming that he would have used  
4 that printing press for other printing jobs and  
5 that's why he was losing millions of dollars?**

6 A I think he was, my impression, as I recall,  
7 at this point was he was saying that the business  
8 with Stratosphere alone was millions of dollars and  
9 they're a big casino, a big hotel.

10 **Q And you are looking at Page 15 of the  
11 deposition?**

12 A Yes.

13 **Q Okay. And that's the deposition of Mr.  
14 Zandian.**

15 A Right.

16 **Q Okay.**

17 A And so he is on the one hand claiming he is  
18 acting on their behalf and then when you ask him  
19 well, if this is not one of your companies -- well, I  
20 have an association, so everything was very, very  
21 vague, you could never get a straight answer out of  
22 him about anything.

23 **Q So you did not believe he was being truthful  
24 during his deposition?**

25 A No, I don't. And I think that -- then I

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1 SUSAN D. SALISBURY, ESQ.  
 2 asked him how to -- okay. I said:  
 3 "You, Reza Zandian, were buying that  
 4 equipment?  
 5 "A Yes."  
 6 Which really contradicts what he said in his  
 7 answers to interrogatories because he was saying he  
 8 was acting on behalf of Image Line Graphics.  
 9 **Q And which page of the deposition --**  
 10 A And that's on Page 21.  
 11 "Were you buying for your own behalf or  
 12 someone else?"  
 13 That's the question.  
 14 "A On my own behalf.  
 15 "Q How did you pay for that equipment?"  
 16 Objection from his attorney:  
 17 "Assumes facts not in evidence."  
 18 So then I said:  
 19 "Did you pay for the equipment?"  
 20 He says, "Yes."  
 21 "Q How did you pay for it?"  
 22 Now this contract claims to be for more than  
 23 a million dol -- a million euros which was roughly a  
 24 million dollars at that point in time.  
 25 "A I paid by cash or bank transfer or  
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1 SUSAN D. SALISBURY, ESQ.  
 2 notation that the cash was received?  
 3 "Regarding this purchase?"  
 4 And he says:  
 5 "A Yes, we paid."  
 6 When I said:  
 7 "Do you recall whether you paid for the  
 8 machinery through a wire transfer from one bank  
 9 to another bank?"  
 10 "A Yes, we paid them.  
 11 "Q What bank did you transfer the money  
 12 from?  
 13 "A A bank in Switzerland.  
 14 "Q And what was the name of the bank?  
 15 "A EFG.  
 16 "Q What bank did you transfer the money  
 17 to?  
 18 "A I don't recall that.  
 19 "Q Was it also a Swiss bank?  
 20 "A I don't know."  
 21 I mean, this was -- trying to take this  
 22 man's deposition and get him to actually come up with  
 23 any documentation was hopeless. First of all, he is  
 24 using Swiss banks which are not going to produce any  
 25 documentation, they're in another country, but he  
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1 SUSAN D. SALISBURY, ESQ.  
 2 other means of payment."  
 3 A million dollars and you can't remember  
 4 whether it was cash or bank transfer or other means  
 5 of payment which is really not an answer at all.  
 6 "Do you have any documentation showing that  
 7 money was transferred from you to EMFACO?  
 8 "A Yeah, we already supplied that to  
 9 before."  
 10 And he had not supplied anything that had  
 11 anything to do with that.  
 12 And then we got into an argument. She is  
 13 not, Ms. Martin is not going to produce any  
 14 documents, Mr. Zandian is not going to further answer  
 15 the question, and there's pages of argument with me  
 16 and Ms. Martin and Ms. Martin basically testifying on  
 17 the record.  
 18 **Q Okay. And the million euros which you just**  
 19 **described, that's what Mr. Zandian claimed he paid**  
 20 **for the equipment; is that correct?**  
 21 A Yes. Well, yes.  
 22 And on Page 26 -- well, 25. And then he  
 23 says, I said to him:  
 24 "Do you have any receipts for cash from  
 25 EMFACO, did you get any kind of receipt or  
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1 SUSAN D. SALISBURY, ESQ.  
 2 knows -- I mean, what my impression was he knows that  
 3 he is making it impossible. He is going to come in  
 4 and he is going to make these claims that he spent  
 5 all this money and I guess he says somewhere else in  
 6 the deposition seven hundred, that the euro to the  
 7 dollar at that point in time is about 750,000.  
 8 **Q Prior to the deposition had you asked for**  
 9 **the documents that you are now discussing?**  
 10 A Yes.  
 11 **Q And did you ask for them pursuant to a**  
 12 **request for production?**  
 13 A Yes, I did.  
 14 **Q And going back as I started to ask about the**  
 15 **million euros that he -- that was the money that he**  
 16 **claimed his company paid for the equipment, correct?**  
 17 A Correct.  
 18 **Q And which company was it that he claimed**  
 19 **paid for the equipment?**  
 20 A No. I'm sorry. He said he, Reza Zandian,  
 21 paid for the equipment and he purchased it from  
 22 EMFACO which he also had an ownership, which he  
 23 admitted he had an ownership share in.  
 24 **Q So he owned both EMFACO or had an ownership**  
 25 **interest in EMFACO?**  
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1           **SUSAN D. SALISBURY, ESQ.**  
2           A And then he is buying it from them.  
3           **Q Right. And from neither company could he**  
4           **produce any documents.**  
5           A Correct.  
6           **Q Let me introduce as Exhibit -- let me ask**  
7           **you, excuse me, to just review these photographs.**  
8           **Do you recognize these photographs?**  
9           A Yes.  
10          **Q And what are these photographs of?**  
11          A These are photographs that were taken by my  
12 client of the contents of the containers when they  
13 sold the contents to -- they sold it to Wilmington  
14 Equipment Sales and to -- let's see. The other  
15 company was U.S. Metals.  
16          **Q So you recognize these documents?**  
17          A Yes.  
18          **Q Are these documents from your files?**  
19          A Yes.  
20          MS. BURNS: I would like to have the court  
21 reporter mark these as Exhibit 7.  
22          THE REPORTER: You identified the transcript as  
23 seven. This will be eight.  
24          MS. BURNS: I'm sorry. Let's make it eight  
25 then.  
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1           **SUSAN D. SALISBURY, ESQ.**  
2           (Exhibit 8, a document, marked for  
3 identification, as of this date.)  
4           **Q BY MS. BURNS: Ms. Salisbury, Exhibit 8**  
5           **represents the, for lack of a better term, items**  
6           **found in the containers that belonged to Mr. Zandian;**  
7           **is that correct?**  
8           A Correct.  
9           **Q And let me clarify. I know the containers**  
10          **themselves belonged to Evergreen but the contents are**  
11          **the contents that Mr. Zandian claimed were his goods.**  
12          A Correct.  
13          **Q And Mr. Zandian claimed in the litigation**  
14          **that he paid a million euros for the contents of**  
15          **these containers.**  
16          A Correct.  
17          **Q As part of this exhibit there are some**  
18          **checks and invoices. What are those checks and**  
19          **invoices for?**  
20          A Those were -- those represent the amount of  
21 money that was paid by Wilmington Equipment Sales and  
22 U.S. Metals for the contents of the containers and  
23 basically they were -- they were received as junk  
24 metal for salvage value.  
25          **Q And if you could elaborate, why were they**  
            TSG Reporting - Worldwide 877-702-9580

1           **SUSAN D. SALISBURY, ESQ.**  
2           **received as junk metal when Mr. Zandian was claiming**  
3           **he had purchased these items for over a million**  
4           **euros?**  
5           A Because Lazo Trucking, Toni Baca and Gracy  
6 Lazo had attempted to sell them to people who bought  
7 equipment and they were basically laughed at.  
8           **Q So your client attempted to sell them to**  
9           **several different entities?**  
10          A Yes. And they -- well, it was obviously in  
11 their interest at this point in time that they were  
12 doing this and the date on this is March 31st and so  
13 at this point in time they've had --  
14          **Q And this being when you say -- we're going**  
15          **to take a break.**  
16          THE VIDEOGRAPHER: The time is 12:46 p.m. We're  
17 now off the record.  
18          (Recess)  
19          THE VIDEOGRAPHER: This concludes Tape Number 1  
20 of the videotaped testimony of Susan Salisbury. The  
21 time is 12:49 p.m. We are now off the record.  
22          (Recess)  
23          THE VIDEOGRAPHER: This is the beginning of Tape  
24 Number 2 of the videotaped testimony of Susan  
25 Salisbury. The time is 1:03 p.m. We are now on the  
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1           **SUSAN D. SALISBURY, ESQ.**  
2           record.  
3           MS. BURNS: Thank you.  
4           **Q While we took a break so that the court**  
5           **reporter didn't have to choke to death you had a**  
6           **moment to review a little more closely the deposition**  
7           **of Mr. Zandian and it appears that the color, the**  
8           **documents that you had been reviewing as Exhibit 8**  
9           **are mostly contained in the deposition of Mr. Zandian**  
10          **as Exhibit D; is that correct?**  
11          A Correct.  
12          **Q And did you ask Mr. Zandian if he recognized**  
13          **Exhibit D which -- to his deposition -- which were**  
14          **the contents of the containers that he had shipped?**  
15          A Yes, I did.  
16          **Q And what was his response?**  
17          A He recognized some of it but not all of it.  
18 Some of it he didn't recognize.  
19          **Q Okay. Did Mr. Zandian ever provide any**  
20          **proof that the contents of the containers were worth**  
21          **a million euros?**  
22          A No, he never did. And I would like to bring  
23 up a particular point about that that I just recalled  
24 from this whole unpleasant episode.  
25          I had contacted someone who was an expert on  
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1 SUSAN D. SALISBURY, ESQ.  
 2 the valuation of printing equipment and the printing  
 3 equipment that he claimed to have lost which was the  
 4 Lithoman and the Heidelberg could have been very  
 5 valuable as he claimed.  
 6 **Q He being Mr. Zandian?**  
 7 A Mr. Zandian claimed.  
 8 However, what I was told by this person who  
 9 I was looking for potential experts told me that  
 10 these printing presses all have serial numbers and  
 11 that I believe it is the Heidelberg, the company that  
 12 produces the Heidelberg press, and, again, these are  
 13 very, very commercial level presses, he said they  
 14 know where every one of their printing presses is so  
 15 it was very significant that none of the  
 16 documentation produced by Mr. Zandian, including the  
 17 contract, including the shipping documents, nothing  
 18 that we were able to obtain anywhere had a machine  
 19 number on there. That would be like selling an  
 20 automobile without the VIN number. It is just -- it  
 21 is just not believable because that is the number  
 22 that you use to identify that automobile throughout  
 23 its life span. The same thing with a Lithoman or a  
 24 Heidelberg press. These are extraordinarily  
 25 expensive pieces of equipment and the shipping  
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1 SUSAN D. SALISBURY, ESQ.  
 2 of the expert?  
 3 A I don't know that I ever made a notation of  
 4 it that went into the file permanently but, yeah, I  
 5 will look at the file and see if I could find it.  
 6 (Information Requested: \_\_\_\_\_)  
 7 **Q Okay.**  
 8 A I am relatively confident that, my  
 9 recollection is you could almost look that up on the  
 10 web and they can tell you what the -- they will ask  
 11 you for a serial number off the machine and these are  
 12 very expensive pieces of equipment when they're new  
 13 but that is kind of like a brand new Rolls-Royce, a  
 14 fender, a beat up fender of an old Rolls-Royce is  
 15 really not the same thing as a complete brand new  
 16 Rolls-Royce.  
 17 **Q Now this expert that you spoke to, do you**  
 18 **recall if you paid him or her any money?**  
 19 A No, I think we didn't. I think at that  
 20 point --  
 21 **Q It was a him?**  
 22 A It was a him and I think we were just having  
 23 conversations and then we settled the case and there  
 24 was no need to go forward with the services.  
 25 **Q Was the expert someone who worked at the**  
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1 SUSAN D. SALISBURY, ESQ.  
 2 document, which was Exhibit C, for the bill of lading  
 3 describes all of these as one unit machinery, it  
 4 doesn't even call them a printing press or part of a  
 5 printing press.  
 6 And when I asked him was the entire Lithoman  
 7 contained in these 12 containers --  
 8 **Q He being Mr. Zandian?**  
 9 A Mr. Zandian. He said a portion of the  
 10 Lithoman was contained in the 12 containers and the  
 11 same with respect to the Heidelberg, so he was very  
 12 evasive. He was claiming parts of it were in other  
 13 containers that were not part of that 12 shipment.  
 14 And, again, it just went -- it fell apart.  
 15 **Q What is a Lithoman?**  
 16 A A Lithoman is a brand name for a commercial  
 17 printing press as is Heidelberg, different printing  
 18 press. And the contracts between EMFACO and Mr.  
 19 Zandian were I believe for a Lithoman and a  
 20 Heidelberg, two separate printing presses.  
 21 **Q What was the name of the expert that you**  
 22 **consulted with?**  
 23 A I don't recall, but I'm sure if you -- I --  
 24 **Q Do you think if you reviewed the rest of the**  
 25 **file and we left a blank you could provide the name**  
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1 SUSAN D. SALISBURY, ESQ.  
 2 company or somebody who worked for let's say some  
 3 type of equipment company or --  
 4 A I probably got his name out of an ad either  
 5 on the internet or in one of the expert directories.  
 6 **Q Okay. And did he inspect the goods?**  
 7 A No, we never went that far, we just had a  
 8 conversation and one of the first things he asked me  
 9 was what was the serial number.  
 10 **Q There were no serial numbers on it?**  
 11 A I don't know if there were any but, of  
 12 course, by that time the equipment had been disposed  
 13 of. Mr. Zandian never provided any serial numbers.  
 14 He didn't have any.  
 15 **Q And as you said, it seemed odd that Mr.**  
 16 **Zandian would not have the serial numbers for these**  
 17 **items?**  
 18 A It seemed very odd that you would have a  
 19 contract for the purchase and sale of items and not  
 20 have the serial number, somewhat like buying a car  
 21 and paying for it and not having the VIN number. By  
 22 the time you actually execute the documents to  
 23 purchase the car, you have the VIN number.  
 24 **Q Is there anything else that you recall that**  
 25 **you thought was not believable in the testimony of**  
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1 SUSAN D. SALISBURY, ESQ.  
 2 **Mr. Zandian during his deposition?**  
 3 A Well, among other things, I mean, he didn't  
 4 know where Image Line Graphics was after he said he  
 5 was acting on their behalf.  
 6 **Q Are there also letters in there from Mr.**  
 7 **Zandian, and in there being in the deposition from**  
 8 **Mr. Zandian, on Image Graphics stationery? You may**  
 9 **want to look at the exhibits.**  
 10 A Yes, there are, absolutely. And, in fact,  
 11 in the beginning that was what all of his  
 12 correspondence said, Image Line Graphics. A lot of  
 13 it did. And --  
 14 **Q If I could turn your attention to Exhibit**  
 15 **K --**  
 16 A Right.  
 17 **Q -- of the deposition of Mr. Zandian, what is**  
 18 **Exhibit K?**  
 19 A This is a letter Mr. Zandian sent to Gracy  
 20 Lazo about the delivery of the 12 containers and it  
 21 says, "Dear Gracy: You accepted \$9,000 for shipping  
 22 charges of 12 containers" and telling her --  
 23 **Q What was the first part?**  
 24 A "You accepted \$9,000 for shipping charges of  
 25 12 containers."  
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1 SUSAN D. SALISBURY, ESQ.  
 2 **Q Thank you.**  
 3 **Is there anything else that occurred during**  
 4 **the deposition of Mr. Zandian in his testimony that**  
 5 **you thought was not believable?**  
 6 A Well, I -- almost everything, really. He,  
 7 among other things, he couldn't remember -- I mean,  
 8 he never paid, he admitted he never paid the charges  
 9 for shipping the cargo to the United States and he  
 10 had run up a bill of \$325,000 or some such thing with  
 11 Evergreen and I guess, I don't -- I guess they just  
 12 wanted to finally let it go because they wanted to  
 13 get the cargo off their dock. I'm not quite sure why  
 14 they got rid of it. You know, they wanted to get rid  
 15 of it. But everything about the whole enterprise was  
 16 insane, that's the only way I could put it.  
 17 And when I, you know, would try to -- as  
 18 soon as you would try to focus in and try to get some  
 19 specific answers out of Mr. Zandian he would change  
 20 his position or change what he was saying and --  
 21 **Q I would like to focus you back to Exhibit K**  
 22 **of his deposition.**  
 23 A Yes.  
 24 **Q On Page 98 there is a reference to your**  
 25 **introducing the Exhibit K. Can you take a moment to**  
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1 SUSAN D. SALISBURY, ESQ.  
 2 **review that.**  
 3 A Yes. Okay.  
 4 **Q And when you -- would you like to read the**  
 5 **testimony of Mr. Zandian, your questioning of Mr.**  
 6 **Zandian.**  
 7 A Yes. The question, at this point we're  
 8 talking about where the cargo is going to be  
 9 delivered.  
 10 **Q No, just does he -- does he -- the testimony**  
 11 **regarding you introducing --**  
 12 A "Q I'd like to show you Exhibit K.  
 13 Did you write that letter to Lazo Trucking?  
 14 "A Yes."  
 15 **Q Thank you.**  
 16 **Before the lawsuit was filed did Mr. Zandian**  
 17 **or his attorney ever discuss with you or your client**  
 18 **submitting his claim to an insurance company?**  
 19 A Yes.  
 20 **Q And is this what you were referring to at**  
 21 **the beginning of the deposition where you stated that**  
 22 **he had talked about turning it over to the, the cargo**  
 23 **over to the insurance carrier and that you felt it**  
 24 **was a, quote, "cooked up claim and I had to say I**  
 25 **agreed with them," end quote?**  
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1 SUSAN D. SALISBURY, ESQ.  
 2 A Yes.  
 3 **Q Okay. Can you elaborate on this?**  
 4 A Well, I -- the fact that they -- and I think  
 5 he and his attorney both brought up the issue of  
 6 turning it over to the insurance carrier.  
 7 **Q And it was the attorney to you and it was**  
 8 **Mr. Zandian to your client.**  
 9 A Yes.  
 10 **Q And Mr. Zandian, did he bring this up to**  
 11 **your client, at least your understanding, prior to**  
 12 **the litigation?**  
 13 A Yes.  
 14 **Q And Mr. Zandian's attorney spoke with you**  
 15 **about turning it over?**  
 16 A Yes.  
 17 **Q And how soon after you had made contact with**  
 18 **Mr. Zandian's attorney did he bring up submitting the**  
 19 **claim to the insurance company?**  
 20 A Relatively soon.  
 21 **Q And what is your understanding that Mr.**  
 22 **Zandian said about submitting the claim to an**  
 23 **insurance company?**  
 24 A Well, he didn't understand why we had not  
 25 done that and he seemed eager for us to do that. I  
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1 SUSAN D. SALISBURY, ESQ.  
2 just formed the impression from his eagerness to have  
3 this case turned over to the insurance carrier that  
4 he had a belief that rather than incur the litigation  
5 costs that were going to be involved with this case,  
6 that an insurance carrier would pay him some money.

7 **Q And what did you form this belief based on?**

8 A Well, partly I worked for an insurance  
9 company doing insurance defense for --

10 **Q How long?**

11 A I did insurance defense for six years and  
12 then of course before that I did employment defense  
13 for nine years. Some of it you would call a gut  
14 instinct, almost, that --

15 **Q What was it that he said that led you to,  
16 and I think you stated before, you, quote, "got the  
17 sense he did this before," end quote?**

18 A Well, he seemed to -- most people other  
19 than, and even in an auto accident, people know you  
20 have insurance in an auto accident because they're  
21 trained to ask for your insurance, but when people  
22 are generally damaged or harmed that's not usually  
23 the first thing that they think about. And that was  
24 one of the things that -- the other thing that just  
25 doesn't hold together, if you have equipment that's

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1 SUSAN D. SALISBURY, ESQ.  
2 really worth anywhere near what he claimed it was  
3 worth you don't disappear and let it go because of  
4 \$9,000. That was the other thing. You pay --

5 **Q When you say disappear and let it go, it was  
6 that your client kept trying to contact --**

7 A Correct.

8 **Q And letters came back.**

9 A Right.

10 **Q And those letters are also attached as  
11 exhibits, letters that came back.**

12 A Correct.

13 **Q Exhibits to this deposition.**

14 A If you really had equipment worth that much  
15 money you are going to come up with the money and get  
16 it delivered and you are going to have things like  
17 serial numbers and I.D. numbers, you are going to be  
18 able to -- you might not have the vehicle  
19 identification number on your car memorized but you  
20 have a record of it and if your car is stolen, you  
21 know where to find it. You have documents that have  
22 these kinds of pieces of information. And so that's  
23 part of what -- and then bringing up the insurance  
24 company, I thought, well, what he -- and then, you  
25 know, comes up with this contract for supposedly a

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1 SUSAN D. SALISBURY, ESQ.  
2 million euros --

3 **Q Did your client have insurance?**

4 A Yes, my client did have insurance. They had  
5 cargo insurance and --

6 **Q Did they tender this to their insurance  
7 company?**

8 A No, they did not.

9 **Q And was Mr. Zandian aware of that?**

10 A Yes. In response to that question I told  
11 him that, Number 1, this was not an accidental loss  
12 so I wasn't sure that there was coverage and, Number  
13 2, they didn't want to have their premiums go up and  
14 there's no requirement, it is not -- the cargo  
15 insurance is not there for Mr. Zandian, the cargo  
16 insurance is very much there for the same reason that  
17 you have liability insurance on your car, to protect  
18 you from a lawsuit.

19 **Q And do you remember any specific statements  
20 that Mr. Zandian's attorney said to you that made you  
21 suspicious about submitting the claim or that this  
22 was, quote, "a put up job," end quote?**

23 A It was the whole flimsiness of the  
24 documentation, the -- first of all, if you have cargo  
25 that's worth half of what he said it was worth you

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1 SUSAN D. SALISBURY, ESQ.  
2 are going to be considerably more concerned about it  
3 and then we had found out by the time that this  
4 litigation started that the cargo had sat on the dock  
5 in Long Beach for a year and a half and that was why  
6 Evergreen was trying to get rid of it, they were  
7 trying to get it off their dock. Again, that, and I  
8 think they had the same problem with Mr. Zandian  
9 where he disappeared for months and they couldn't  
10 find him.

11 **Q Now you had mentioned about not submitting  
12 the claim to the insurance company. You had  
13 mentioned that your client didn't want their premium  
14 to go up. Why would it go up? Did you think it was  
15 not a valid claim?**

16 A Because it still cost the insurance company  
17 money to litigate the claim and in this case probably  
18 more money to litigate it than what they would have  
19 had to pay. And, in addition, the problem that they  
20 may not have all the expertise in terms of the  
21 shipping issues that I was able to get from my  
22 client. And important things like this is not what a  
23 normal, a bill of lading -- I mean, that's just  
24 incredible that you would have a bill of lading that  
25 doesn't tell you the serial number because one of

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1 SUSAN D. SALISBURY, ESQ.  
 2 those things that you are going to be concerned about  
 3 is whether machinery gets stolen in transit and you  
 4 want to be able to hold the shipper liable if they  
 5 don't deliver the machinery that they picked up.  
 6 **Q Okay.**  
 7 A So there was just a whole lot of everything  
 8 we looked at looked more and more like a phony claim.  
 9 **Q So you thought that if you submitted the**  
 10 **claim to Lazo Trucking Express' insurance company**  
 11 **that it would rise to the level of fraud?**  
 12 A I can't say that -- I mean, you can submit a  
 13 fraudulent claim to your insurance carrier. What you  
 14 are concerned about is whether they will understand  
 15 that it is fraudulent. You have every right to  
 16 submit a fraudulent claim. You are not the one  
 17 committing the fraud, it would be the other person  
 18 that's committing it.  
 19 **Q Did you believe that if your client**  
 20 **submitted such a claim that it might rise to the**  
 21 **level of fraud?**  
 22 A Yes. Not on the part of my client but that  
 23 it was a fraudulent claim, yes.  
 24 **Q Thank you.**  
 25 **You mentioned that after the lawsuit settled**  
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1 SUSAN D. SALISBURY, ESQ.  
 2 closed containers, some of them were flatbeds and you  
 3 could see what was on them.  
 4 **Q Had your client received any information**  
 5 **from Immigration and Customs Enforcement or Homeland**  
 6 **Security that they had inspected the containers?**  
 7 A I don't recall that. I think that there was  
 8 some suspicion that Mr. -- they did tell my clients  
 9 that there was some suspicion that Mr. Zandian was  
 10 using these containers as a cover for something else.  
 11 **Q Who is they?**  
 12 A FBI or Homeland Security believed that Mr.  
 13 Zandian might be using these containers to disguise  
 14 other forbidden cargo.  
 15 **Q And which -- when was it that your client**  
 16 **was told by the FBI or Homeland Security?**  
 17 A It was I believe in January, I think they  
 18 still had the cargo there, and they may have come  
 19 out. I don't recall the whole situation.  
 20 **Q So this was before the lawsuit.**  
 21 A Yes, it was before the lawsuit.  
 22 What I remember is that Mr. Matthis at  
 23 Jake's Crane was also contacted by the FBI and he  
 24 volunteered that to me and by Homeland Security.  
 25 **Q Did Mr. Matthis let Homeland Security or the**  
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1 SUSAN D. SALISBURY, ESQ.  
 2 **Mr. Zandian called while you were still representing**  
 3 **your client and you said something to the effect of**  
 4 **suggesting that you two, being you and Mr. Zandian,**  
 5 **do business together.**  
 6 A Correct.  
 7 **Q What type of business was he saying that you**  
 8 **two should do together?**  
 9 A I have no idea because I terminated the  
 10 conversation at that point and told him never to call  
 11 me again and then called his attorney and told her to  
 12 tell him to never call me again.  
 13 **Q Okay. And did his attorney say anything**  
 14 **more specific about the business that you two would**  
 15 **be doing together to try to talk you into it?**  
 16 A No. She took the message.  
 17 **Q Okay.**  
 18 **You had mentioned before contact; that your**  
 19 **client got contacted by the FBI. Strike that.**  
 20 **Going back to the value of the contents of**  
 21 **the containers, did your client receive any**  
 22 **information regarding the contents of the containers**  
 23 **before they were opened?**  
 24 A I think that they were told that it was  
 25 printing press equipment and these were not all  
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1 SUSAN D. SALISBURY, ESQ.  
 2 **FBI investigate or look at the cargo?**  
 3 A The cargo never went to Las Vegas so there  
 4 was nothing to look at at Mr. Matthis' location.  
 5 **Q Okay. So Mr. Matthis was just notified but**  
 6 **he did not have possession of the containers?**  
 7 A Correct. Mr. -- the FBI agent was trying to  
 8 track down all of the containers and apparently there  
 9 were another, I don't know, 15 or 17 containers that  
 10 Mr. Zandian had at a place called Crescent Warehouse.  
 11 **Q How do you have knowledge of this?**  
 12 A This was from the FBI agent who was trying  
 13 to track down what had happened to those containers.  
 14 **Q When did you speak to the FBI agent?**  
 15 A I didn't, Gracy did.  
 16 MS. BURNS: Off the record for a moment.  
 17 THE VIDEOGRAPHER: The time is 1:26 p.m. We are  
 18 now off the record.  
 19 (Recess)  
 20 THE VIDEOGRAPHER: The time is 1:32 p.m. We are  
 21 now on the record.  
 22 BY MS. BURNS:  
 23 **Q Ms. Salisbury, before the backdrop started**  
 24 **to attack you we were talking about the Immigration**  
 25 **and Customs Enforcement, FBI and Homeland Security.**  
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1           **SUSAN D. SALISBURY, ESQ.**  
 2           **Did you ever have any direct conversations**  
 3 **with them about Mr. Zandian or his shipments?**  
 4           A No.  
 5           **Q However, you said your client had**  
 6 **conversations.**  
 7           A Yes. And I have a recollection that the FBI  
 8 came out and actually looked at the containers before  
 9 they left. Well, they were there for quite a long  
 10 time, they were there until March; that they actually  
 11 inspected the containers.  
 12           **Q And did your client tell you what the FBI**  
 13 **said was in the containers or the value of what was**  
 14 **in the containers?**  
 15           A Well, they were just a bunch of worthless  
 16 junk and I think that's one of the things that made  
 17 the FBI suspicious that he was trying to import  
 18 something small and essentially bury it inside the  
 19 junk, something that was not allowed to be imported  
 20 and bury it inside the junk and I think --  
 21           **Q Is this something your client told you that**  
 22 **the FBI had told her?**  
 23           A Yes. And she had given me the name of the  
 24 agent and I don't recall the name as I sit here. I  
 25 think it was McClain or something like that.

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1           **SUSAN D. SALISBURY, ESQ.**  
 2           **Q -- on a government website.**  
 3 **Can you describe that? Do you recall what**  
 4 **the website was?**  
 5           A It had something to do with Customs.  
 6           **Q Okay.**  
 7           A And he was on a list of people, and I don't  
 8 remember the name of the bureau, some bureau that's  
 9 part of Customs, and he was on a list of people who  
 10 were not allowed to have export licenses. And there  
 11 had been some adjudication that he had violated the  
 12 law by trying to export I believe it was computers to  
 13 Iran that were of a sufficient complexity that they  
 14 were not allowed; that it was a national security  
 15 risk.  
 16           **Q Okay.**  
 17           A And I tried to question him about that at  
 18 his deposition and his attorney objected and refused  
 19 to allow him to answer the questions.  
 20           **Q And did you ever do a motion to compel?**  
 21           A I don't -- looking back at the record, I  
 22 don't think I did. I did not. I think what  
 23 happened --  
 24           **Q Was that because the matter settled?**  
 25           A No. What happened is that he finally showed

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1           **SUSAN D. SALISBURY, ESQ.**  
 2           And it was also very curious, the other  
 3 thing that that agent had told Gracy is that there  
 4 were other containers that had been imported and that  
 5 he was trying to track down where they were and  
 6 apparently in those -- the FBI agent communicated to  
 7 Gracy that the other trucker who had had something to  
 8 do with those containers had done what she had  
 9 refused to do which was take the containers, to leave  
 10 for Las Vegas and get the address for delivery of the  
 11 containers while on the road, while en route, and she  
 12 had refused to do that.  
 13           **Q So that seemed suspicious to your client?**  
 14           A Well, because the FBI was not able to locate  
 15 those containers. They wanted to inspect those other  
 16 containers and were asking her if she knew anything  
 17 about them and her response was, "No, of course not,  
 18 we never had anything to do with those containers."  
 19           **Q Is this what you were referring to before**  
 20 **that Mr. Zandian was in trouble with Immigration and**  
 21 **Customs Enforcement?**  
 22           A Right. That was -- yes.  
 23           **Q You also brought up Mr. Zandian was on a**  
 24 **list of banned people --**  
 25           A Yes.

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1           **SUSAN D. SALISBURY, ESQ.**  
 2 up for his deposition. I had been trying to --  
 3           **Q No, a motion to compel further responses to**  
 4 **his deposition, I apologize, my question was unclear.**  
 5           A I'm sorry.  
 6           **Q You said he wouldn't testify about that area**  
 7 **so I asked you did you ever do a motion to compel.**  
 8           A No.  
 9           **Q And why did you not do a motion to compel?**  
 10           A Because we settled the case, we didn't have  
 11 to do that.  
 12           **Q Going back, and I apologize, to Exhibit 8**  
 13 **which is the photographs that you gave me --**  
 14           A Right.  
 15           **Q -- with some invoices, and just to make sure**  
 16 **that I have a clear record, the invoices at the back**  
 17 **of Exhibit 8, if you can take a look at it, please --**  
 18           A Yes.  
 19           **Q Those are receipts or invoices for the sale**  
 20 **of Mr. Zandian's equipment.**  
 21           A Correct.  
 22           **Q And these represent all the moneys received**  
 23 **by your client --**  
 24           A Correct.  
 25           **Q -- for the sale of the equipment.**

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1 SUSAN D. SALISBURY, ESQ.  
 2 A Correct.  
 3 Q However, your client also had to pay storage  
 4 and other fees due to the containers remaining in  
 5 Long Beach; is that correct?  
 6 A Yes. That -- well, yes. That was between  
 7 them and Evergreen but I don't know that they ever  
 8 paid the full amount but that would have been a  
 9 fabulously -- not fabulous but over two months of at  
 10 \$800 a day.  
 11 Q And, again, do you recall if the settlement  
 12 agreement was confidential or not confidential? And  
 13 the settlement agreement being in the matter of Mr.  
 14 Zandian versus Lazo Trucking Company.  
 15 A I don't recall whether it was confidential  
 16 or not. I don't think that it was.  
 17 Q Okay. If it is not confidential -- do you  
 18 think you have a copy of the settlement agreement in  
 19 your office?  
 20 A Yes, I have a copy of it.  
 21 Q If we could leave a space in the deposition  
 22 for what the amount was that the matter was settled  
 23 for.  
 24 A Sure.  
 25 (Information Requested: \_\_\_\_\_)  
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1 SUSAN D. SALISBURY, ESQ.  
 2 Do you know whether Mr. Zandian conducts  
 3 businesses or has represented himself to anyone under  
 4 other names or aliases?  
 5 A Well, obviously the check that he had said  
 6 Reza Jazi and I think that I came across other names  
 7 in Las Vegas when I was looking on the web.  
 8 Q And as far as Reza Jazi, did Mr. Zandian in  
 9 his deposition initially state that he did not use  
 10 that name?  
 11 A Yes, he did. But we had to check. Well, go  
 12 ahead.  
 13 Q Okay. Do you know of any other  
 14 activities -- I apologize. Let me go back to the  
 15 question about the names and aliases.  
 16 You do have the deposition of Mr. Zandian in  
 17 front of you.  
 18 A Right.  
 19 Q I think at the beginning of the deposition  
 20 you asked him about names.  
 21 A Right.  
 22 Q Can you review that testimony.  
 23 A He said his full name is a different name  
 24 which is Ghononreza Zandian Jazi, J-a-z-i. He says,  
 25 "That's my full name," that's on Page 4.  
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1 SUSAN D. SALISBURY, ESQ.  
 2 Q And I think you said generally that the  
 3 amount was settled for what your client considered  
 4 the cost of litigation?  
 5 A It was what I considered the cost of going  
 6 to trial. We were faced with --  
 7 Q Would it have been substantially more?  
 8 A Yes. And it would have meant, and this is a  
 9 small company and Gracy and Toni between them run the  
 10 office, they do all the billing, they do all  
 11 dispatching, and it would have meant Gracy or Toni  
 12 being out of the office for at least two weeks.  
 13 Q Okay. Are you aware if Mr. Zandian ever  
 14 attempted to export equipment to Iran?  
 15 A Well, what I read on the web that he had  
 16 done that, yes.  
 17 Q So your knowledge is based on what you read  
 18 on the web?  
 19 A Yes. Publicly available sources.  
 20 Q And you believe that this was a government  
 21 website as opposed to let's say if I wanted to post  
 22 something?  
 23 A Yes. I, to the extent -- I mean, I think  
 24 that the web address had "gov" in it.  
 25 Q Thank you.  
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1 SUSAN D. SALISBURY, ESQ.  
 2 And I said:  
 3 "And so sometimes have you used the name  
 4 Reza Jazi?"  
 5 And then he says, his answer is:  
 6 "For obligation I use the Reza Zandian."  
 7 "Q Have you ever used Reza Jazi as your  
 8 name?  
 9 "A No."  
 10 Then I asked:  
 11 "Have you ever used J-a-z-i as your last  
 12 name on any bank accounts or any documents?"  
 13 And his answer is:  
 14 "Maybe, yes. Sometimes they use  
 15 themselves."  
 16 So how names use themselves I'm not sure  
 17 but --  
 18 Q Was an interpreter used in the deposition?  
 19 A No.  
 20 Q Do you know of any other activity that you  
 21 would consider fraudulent that had been committed by  
 22 Mr. Zandian?  
 23 A My client had heard that he had been  
 24 involved in some land fraud schemes in Nevada  
 25 involving selling vacant land as being considerably  
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1 SUSAN D. SALISBURY, ESQ.  
 2 more valuable, misrepresented. And I'm not sure. He  
 3 did own a lot of land with other people in Nevada, I  
 4 recall doing a property check, and, of course, when  
 5 you get 30 miles outside of Las Vegas it is not  
 6 really -- I mean, it is just empty desert. But that  
 7 was all that I recalled. We never really -- again,  
 8 we didn't have the resources to try to track down all  
 9 these things. And he used different names for each  
 10 one of the deals that he got into.

11 **Q And just one cleanup question. Going back**  
 12 **to Mr. Zandian requesting that the claim be submitted**  
 13 **to insurance, to, excuse me, to Lazo Trucking's**  
 14 **insurance carrier, what would be the amount that Mr.**  
 15 **Zandian or his attorney suggested be submitted?**

16 A My recollection is that it was somewhere  
 17 around 700,000. But, I mean, it is a liability  
 18 policy and so the claim is you've caused me damages  
 19 in the amount of \$700,000 by losing my, getting rid  
 20 of my equipment, junking my equipment. I don't  
 21 recall the exact number, but I think it was 700,000.  
 22 But it is -- basically cargo insurance is liability  
 23 insurance for cargo carriers.

24 MS. BURNS: Okay. We're going to go off the  
 25 record just for one moment.

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1 SUSAN D. SALISBURY, ESQ.  
 2 stood up to him and fought back.

3 **Q And also you did not submit it to an**  
 4 **insurance company.**

5 A And did not submit it and did not roll over.  
 6 And I think he was not -- I think that his perception  
 7 was that an insurance carrier would have made a  
 8 business decision to pay him a nuisance settlement  
 9 just to go away; that by raising facts that would  
 10 have been expensive to investigate, by talking about  
 11 Swiss banks and purchases made in Europe that are  
 12 difficult to verify or to dig up information about,  
 13 that he thought that he was going to be able to come  
 14 in and maybe get 50 or a hundred thousand dollars for  
 15 very little expenditure on his part and that he was  
 16 surprised and in the end the reason he called me and  
 17 wanted to do business with me is because he thought I  
 18 had, you know, fought very hard for Gracy and maybe  
 19 he would fight very hard for him. And not  
 20 understanding that I'm not a completely hired gun;  
 21 that I only take on the causes of people that I think  
 22 are fairly honest and I would never represent Mr.  
 23 Zandian, so -- but I think that was -- but people who  
 24 don't have -- people who have a kind of morality that  
 25 allows them to think that money is the most important

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1 SUSAN D. SALISBURY, ESQ.  
 2 THE VIDEOGRAPHER: The time is 1:43 p.m. We are  
 3 now off the record.

4 (Recess)

5 THE VIDEOGRAPHER: The time is 1:46 p.m. We are  
 6 now on the record.

7 BY MS. BURNS:

8 **Q Ms. Salisbury, I appreciate the time that**  
 9 **you've spent with us making this statement but before**  
 10 **we conclude, is there anything else that you recall**  
 11 **about the lawsuit or about Mr. Zandian and his**  
 12 **actions that we have not covered so far?**

13 A Well, I think that the impression that I  
 14 came away with --

15 **Q You mean from the lawsuit?**

16 A From the lawsuit and from Mr. Zandian  
 17 calling me was that Mr. Zandian was surprised, he  
 18 knew this was a small company and he knew that they  
 19 could ill afford to defend against this kind of a  
 20 lawsuit; that he was surprised that they had not  
 21 turned it over to their insurance carrier; that he  
 22 seemed to have some familiarity with how insurance  
 23 carriers work; that if he threw in some documentation  
 24 that they would pay him rather than incur a lot of  
 25 litigation expense, and that he was surprised that we

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1 SUSAN D. SALISBURY, ESQ.

2 thing in the world thinks everybody else thinks the  
 3 same way. I don't. But that's what he thinks. So  
 4 I -- I was shocked when he called me because it was  
 5 incomprehensible to me that he did not understand  
 6 that I didn't like him and that I did not think he  
 7 was a very honest person, but then he probably didn't  
 8 think those things were very important.

9 **Q Anything else?**

10 A That's it.

11 MS. BURNS: We are concluded.

12 I would like to state that the court  
 13 reporter will send an original to -- should she send  
 14 it directly to you?

15 THE WITNESS: Sure.

16 MS. BURNS: For signature. And then you will  
 17 send it back to me.

18 THE WITNESS: Absolutely.

19 MS. BURNS: And I'm not sure, we don't need any  
 20 stipulations.

21 THE WITNESS: No, we don't. There's nobody to  
 22 stipulate with.

23 MS. BURNS: Okay. So we're concluded.

24 THE VIDEOGRAPHER: This concludes Tape Number 2  
 25 of 2 of the videotaped testimony of Susan Salisbury.

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1 SUSAN D. SALISBURY, ESQ.  
2 The time is 1:50 p.m. We are now off the record.  
3  
4  
5  
6  
7

8 \_\_\_\_\_  
9 SUSAN D. SALISBURY, ESQ.  
10

11 Subscribed and sworn to  
12 Before me this day  
13 of 2008.  
14 \_\_\_\_\_  
15  
16  
17  
18  
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21  
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24  
25

1 SUSAN D. SALISBURY, ESQ.  
2 State of California )  
3 ) ss.

4 County of Los Angeles )  
5 I, SUSAN A. SULLIVAN, CALIFORNIA CSR No.  
6 3522, RPR, CRR, do hereby certify:

7 That prior to being examined SUSAN D.  
8 SALISBURY, ESQ., the witness named in the foregoing  
9 testimony under oath, was, before the commencement of  
10 the testimony under oath, duly administered an oath  
11 in accordance with C.C.P. Section 2094;

12 That the said testimony under oath was taken  
13 before me at the time and place therein set forth,  
14 and was taken down by me in shorthand and thereafter  
15 transcribed into typewriting under my direction and  
16 supervision; that the said testimony under oath is a  
17 true and correct record of the testimony given by the  
18 witness;

19 I further certify that I am neither counsel  
20 for, nor in any way related to any party to said  
21 action, nor in any way interested in the outcome  
22 thereof.

23 IN WITNESS WHEREOF, I have subscribed my  
24 name on this 1st day of February, 2008.

25 \_\_\_\_\_  
CSR

1 SUSAN D. SALISBURY, ESQ.  
2 INDEX  
3  
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5 Examination by Ms. Burns 5  
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8 INFORMATION REQUESTED

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1 SUSAN D. SALISBURY, ESQ.  
2 NAME OF CASE: Universal vs. Optima  
3 DATE OF TESTIMONY UNDER OATH: January 25, 2008  
4 NAME OF WITNESS: SUSAN D. SALISBURY, ESQ.  
5 Reason Codes:

- 6 1. To clarify the record.
- 7 2. To conform to the facts.
- 8 3. To correct transcription errors.

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SUSAN D. SALISBURY, ESQ.

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## GOLD CANYON DEVELOPMENT LLC

Business Entity Information	
Status: Active	File Date: 5/27/2004
Type: Domestic Limited-Liability Company	Corp Number: LLC11545-2004
Qualifying State: NV	List of Officers Due: 5/31/2008
Managed By: Managers	Expiration Date: 5/27/2504

Resident Agent Information	
Name: ELIAS ABRISHAMI	Address 1: 220 SUSSEX PL
Address 2:	City: CARSON CITY
State: NV	Zip Code: 89703
Phone:	Fax:
Email:	Mailing Address 1: PO BOX 2919
Mailing Address 2:	Mailing City: CARSON CITY
Mailing State: NV	Mailing Zip Code: 89702

Financial Information	
No Par Share Count: 0	Capital Amount: \$ 0
No stock records found for this company	

Officers		<input type="checkbox"/> Include Inactive Officers
Managing Member - ELIAS ABRISHAMI		
Address 1: P O BOX 2919	Address 2:	
City: CARSON CITY	State: NV	
Zip Code: 897022919	Country:	
Status: Active	Email:	
Managing Member - RAFI ABRISHAMI		
Address 1: P O BOX 2919	Address 2:	
City: CARSON CITY	State: NV	
Zip Code: 897022919	Country:	
Status: Active	Email:	
Managing Member - REZA ZANDIAN		
Address 1: 8350 W SAHARA AVE STE 150	Address 2:	
City: LAS VEGAS	State: NV	
Zip Code: 89117	Country:	
Status: Active	Email:	

Actions/Amendments	
Action Type: Articles of Organization	# of Pages: 1
Document Number: LLC11545-2004-001	Effective Date:
File Date: 05/27/2004	
(No notes for this action)	
Action Type: Initial List	# of Pages: 1
Document Number: LLC11545-2004-002	Effective Date:
File Date: 07/11/2004	

<b>List of Officers for 2004 to 2005</b>			
<b>Action Type:</b>	Resident Agent Change	<b># of Pages:</b>	1
<b>Document Number:</b>	LLC11545-2004-003	<b>Effective Date:</b>	
<b>File Date:</b>	11/16/2004		
ELIAS ABRISHAMI SUITE #1011			
9550 W. SAHARA AVENUE LAS VEGAS NV 89117 RXS			
ELIAS ABRISHAMI RXS			
RXS			
<b>Action Type:</b>	Annual List	<b># of Pages:</b>	1
<b>Document Number:</b>	20050163958-39	<b>Effective Date:</b>	
<b>File Date:</b>	05/02/2005		
(No notes for this action)			
<b>Action Type:</b>	Annual List	<b># of Pages:</b>	1
<b>Document Number:</b>	20060176567-90	<b>Effective Date:</b>	
<b>File Date:</b>	03/20/2006		
(No notes for this action)			
<b>Action Type:</b>	Annual List	<b># of Pages:</b>	1
<b>Document Number:</b>	20070373918-40	<b>Effective Date:</b>	
<b>File Date:</b>	05/29/2007		
(No notes for this action)			

02533

## LYON PARK DEVELOPMENT LLC

Business Entity Information			
<b>Status:</b>	Dissoived on 4/11/2005	<b>File Date:</b>	9/22/2004
<b>Type:</b>	Domestic Limited-Liability Company	<b>Corp Number:</b>	LLC21824-2004
<b>Qualifying State:</b>	NV	<b>List of Officers Due:</b>	9/30/2005
<b>Managed By:</b>	Managers	<b>Expiration Date:</b>	9/22/2504

Resident Agent Information			
<b>Name:</b>	ELIAS ABRISHAMI	<b>Address 1:</b>	8350 W SAHARA AVE
<b>Address 2:</b>	STE 150	<b>City:</b>	LAS VEGAS
<b>State:</b>	NV	<b>Zip Code:</b>	89117
<b>Phone:</b>		<b>Fax:</b>	
<b>Email:</b>		<b>Mailing Address 1:</b>	
<b>Mailing Address 2:</b>		<b>Mailing City:</b>	
<b>Mailing State:</b>		<b>Mailing Zip Code:</b>	

Financial Information	
<b>No Par Share Count:</b> 0	<b>Capital Amount:</b> \$ 0
<b>No stock records found for this company</b>	

Officers		<input type="checkbox"/> Include Inactive Officers
<b>Managing Member - ELIAS ABRISHAMI</b>		
<b>Address 1:</b> PO BOX 2919	<b>Address 2:</b>	
<b>City:</b> CARSON CITY	<b>State:</b> NV	
<b>Zip Code:</b> 89702	<b>Country:</b>	
<b>Status:</b> Active	<b>Email:</b>	
<b>Managing Member - RAFI ABRISHAMI</b>		
<b>Address 1:</b> PO BOX 2919	<b>Address 2:</b>	
<b>City:</b> CARSON CITY	<b>State:</b> NV	
<b>Zip Code:</b> 89702	<b>Country:</b>	
<b>Status:</b> Active	<b>Email:</b>	
<b>Managing Member - REZA ZANDIAN</b>		
<b>Address 1:</b> 220 SUSSEX PL	<b>Address 2:</b>	
<b>City:</b> CARSON CITY	<b>State:</b> NV	
<b>Zip Code:</b> 89703	<b>Country:</b>	
<b>Status:</b> Active	<b>Email:</b>	

Actions/Amendments			
<b>Action Type:</b>	Articles of Organization	<b># of Pages:</b>	1
<b>Document Number:</b>	LLC21824-2004-001	<b>Effective Date:</b>	
<b>File Date:</b>	09/22/2004		
<b>(No notes for this action)</b>			
<b>Action Type:</b>	Initial List	<b># of Pages:</b>	1
<b>Document Number:</b>	LLC21824-2004-002	<b>Effective Date:</b>	
<b>File Date:</b>	11/01/2004		

02534

<b>List of Officers for 2004 to 2005</b>	
<b>Action Type:</b> Dissolution	
<b>Document Number:</b> 20050090105-72	<b># of Pages:</b> 1
<b>File Date:</b> 03/18/2005	<b>Effective Date:</b>
<b>(No notes for this action)</b>	

## DAYTON PLAZA, L.L.C.

Business Entity Information			
<b>Status:</b>	Active	<b>File Date:</b>	5/18/2005 2:24:07 PM
<b>Type:</b>	Domestic Limited-Liability Company	<b>Corp Number:</b>	E0307202005-3
<b>Qualifying State:</b>	NV	<b>List of Officers Due:</b>	5/31/2008
<b>Managed By:</b>	Managers	<b>Expiration Date:</b>	

Resident Agent Information			
<b>Name:</b>	SEAN S. FAYEGHI	<b>Address 1:</b>	1401 LAS VEGAS BLVD SOUTH
<b>Address 2:</b>		<b>City:</b>	LAS VEGAS
<b>State:</b>	NV	<b>Zip Code:</b>	89104
<b>Phone:</b>		<b>Fax:</b>	
<b>Email:</b>		<b>Mailing Address 1:</b>	
<b>Mailing Address 2:</b>		<b>Mailing City:</b>	
<b>Mailing State:</b>		<b>Mailing Zip Code:</b>	

Financial Information	
<b>No Par Share Count:</b> 0	<b>Capital Amount:</b> \$ 0
No stock records found for this company	

Officers		<input type="checkbox"/> Include Inactive Officers
<b>Manager - SEAN S FAYEGHI</b>		
<b>Address 1:</b> 1401 LAS VEGAS BLVD. SOUTH	<b>Address 2:</b>	
<b>City:</b> LAS VEGAS	<b>State:</b> NV	
<b>Zip Code:</b> 89104	<b>Country:</b>	
<b>Status:</b> Active	<b>Email:</b>	
<b>Manager - SHAHROKH REZAI</b>		
<b>Address 1:</b> 7353 SINGING TREE ST.	<b>Address 2:</b>	
<b>City:</b> LAS VEGAS	<b>State:</b> NV	
<b>Zip Code:</b> 89123	<b>Country:</b>	
<b>Status:</b> Active	<b>Email:</b>	
<b>Manager - REZA ZANDIAN</b>		
<b>Address 1:</b> 8350 W. SAHARA AVE.	<b>Address 2:</b> SUITE 150	
<b>City:</b> LAS VEGAS	<b>State:</b> NV	
<b>Zip Code:</b> 89117	<b>Country:</b>	
<b>Status:</b> Active	<b>Email:</b>	

Actions/Amendments			
<b>Action Type:</b>	Articles of Organization	<b># of Pages:</b>	1
<b>Document Number:</b>	20050184429-75	<b>Effective Date:</b>	
<b>File Date:</b>	05/18/2005	(No notes for this action)	
<b>Action Type:</b>	Initial List	<b># of Pages:</b>	1
<b>Document Number:</b>	20050184430-07	<b>Effective Date:</b>	
<b>File Date:</b>	05/18/2005		

(No notes for this action)	
Action Type: Annual List	
Document Number: 20060282468-48	# of Pages: 1
File Date: 05/03/2006	Effective Date:
(No notes for this action)	
Action Type: Annual List	
Document Number: 20070385782-52	# of Pages: 1
File Date: 05/31/2007	Effective Date:
(No notes for this action)	

02537



# STAGECOACH VALLEY LLC.

Business Entity Information	
Status:	Active
Type:	Domestic Limited-Liability Company
Qualifying State:	NV
Managed By:	Managers
File Date:	4/9/2007 4:23:07 PM
Corp Number:	E0263162007-6
List of Officers Due:	4/30/2008
Expiration Date:	

Resident Agent Information	
Name:	REZA ZANDIAN
Address 1:	8350 W. SAHARA AVENUE
Address 2:	
City:	LAS VEGAS
State:	NV
Zip Code:	89117
Phone:	
Fax:	
Email:	
Mailing Address 1:	8775 COSTA VERDE #501
Mailing Address 2:	
Mailing City:	SAN DIEGO
Mailing State:	CA
Mailing Zip Code:	92122

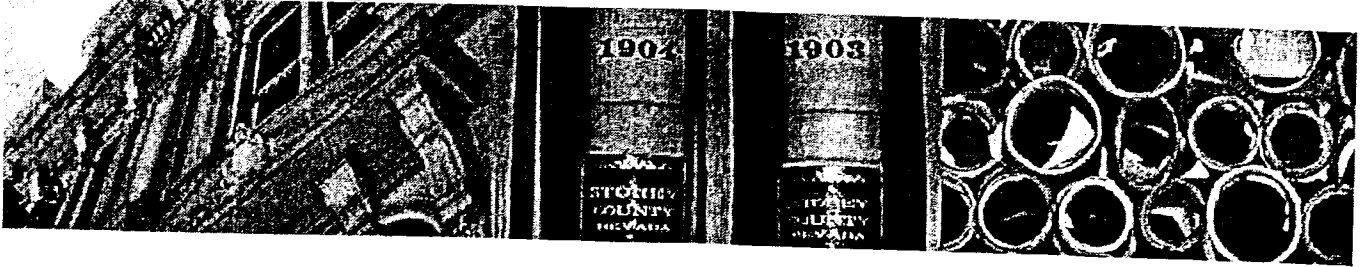
Financial Information	
No Par Share Count:	0
Capital Amount:	\$ 0
No stock records found for this company	

Officers	
<input type="checkbox"/> Include Inactive Officers	
Manager - SASSAN CHAKAMIAN	
Address 1:	7590 FAY AVE. STE 401
Address 2:	
City:	LA JOLLA
State:	CA
Zip Code:	92037
Country:	
Status:	Active
Email:	
Manager - REZA ZANDIAN	
Address 1:	8775 COSTA VERDE #501
Address 2:	
City:	SAN DIEGO
State:	CA
Zip Code:	92122
Country:	
Status:	Active
Email:	

Actions/Amendments	
Action Type:	Articles of Organization
Document Number:	20070248707-47
File Date:	04/09/2007
# of Pages:	2
Effective Date:	
(No notes for this action)	
Action Type:	Initial List
Document Number:	20070248709-69
File Date:	04/09/2007
# of Pages:	1
Effective Date:	
(No notes for this action)	

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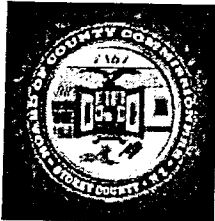
**STOREY COUNTY NEVADA**



**ASSESSOR'S OFFICE MENU**

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- DEPARTMENT LEADERSHIP**
- GENERAL INFORMATION**
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# SERVICES

TYPES OF PROPERTIES ASSESSED | THE ASSESSOR'S OFFICE PROCESS | TAX ROLL EXEMPTION AND PROPERTY TAX REBATE PROGRAMS  
IMPORTANT DATES FOR PROPERTY OWNERS | FORMS  
PROTEST/APPEALS PROCESS INFORMATION | TAX LIEN SALE INFORMATION

[Assessment Information]

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**Parcel No:** 004-181-02  
**Property Location:** 0 ALL IN CO S31 T18N R23E  
**Block:** **Lot:** **District:** 5.2  
**Subdivision:** **Town:** OUTSIDE  
**Parcel Map ID:**

	PRIOR ASSESSMENT VALUE	CURRENT ASSESSMENT VALUE
LAND	11150	55740
BUILDINGS AND IMP	0	0
PERSONAL PROPERTY	0	0
<b>TOTALS</b>	<b>11150</b>	<b>55740</b>

Owner-Occupied/Rental Status:

GOLD CANYON DEVELOPMENT LLC  
 PO BOX 2919  
 CARSON CITY, NV 89702

**Total Acres:** 159.25 **Total Ag Acres:** 0 **Total Square Ft.:** 0  
**Vesting Doc #:** 99313  
**Vesting Doc Year:** 4 **Vesting Doc Book:** 192 **Vesting Doc Page:** 504  
**Map Doc#':** , , , ,

**Improvements**

Sngl- Fam Detached	0	Non-Dwell Unit	0	Sq ft Garage.	0	Att/Det	
Sngl- Fam Attached	0	MH Hookups	0	# Bdrms.	0	# Baths.	0
Multi- Fam Units	0	Wells	0	# of Stories			0
Mobile Homes	0	Septic Tanks	0	Sq Ft Basement			0

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Total Dwell Units: 0 Sq Ft Bldgs 0 Sq Ft Fin Basement 0

**Use/Appraisal Data**

---

Current Land Use Code 100  
Zoning Codes F  
Special Ownership Special Prop Class 0  
Re-Appraisal Group 2 Factoring Group 0 Developer Discount  
Re-appraisal Year 2007 Orig Const. Year 0 Weighted Year 0

**User-defined Fields**

---

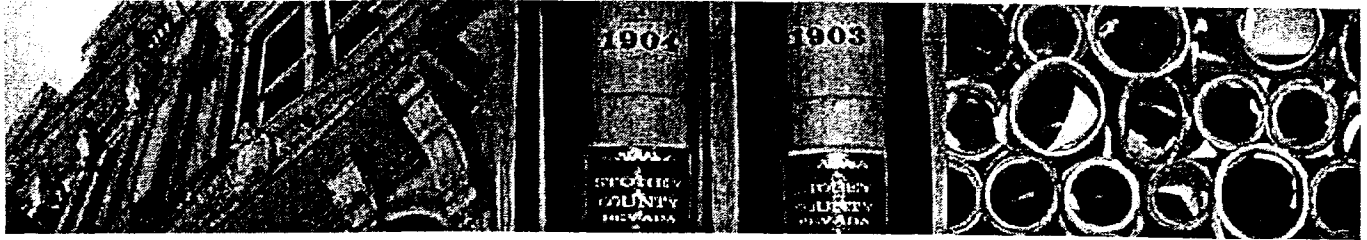
Type & Size of Garage Commercial Sq Ft. 0  
Commercial/Res Sq Ft. (5) Commissioners district 2  
Foundation Type  
Property on Truckee

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# STOREY COUNTY NEVADA



## ASSESSOR'S OFFICE MENU

### ASSESSOR'S OFFICE

### DEPARTMENT LEADERSHIP

### GENERAL INFORMATION

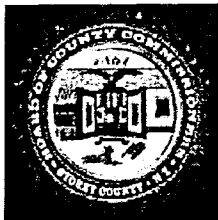
### ASSESSMENT SERVICES

### CURRENT ASSESSMENT AREA

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# SERVICES

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[Assessment Information]

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**Parcel No:** 004-291-02

**Property Location:** 0 ALL IN CO S1 T17N R22E

**Block:** **Lot:** **District:** 5.1

**Subdivision:** **Town:** OUTSIDE

**Parcel Map ID:**

	PRIOR ASSESSMENT VALUE	CURRENT ASSESSMENT VALUE
LAND	173160	182280
BUILDINGS AND IMPS	0	0
PERSONAL PROPERTY	0	0
<b>TOTALS</b>	<b>173160</b>	<b>182280</b>

Owner-Occupied/Rental Status:

GOLD CANYON DEVELOPMENT LLC  
 PO BOX 2919  
 CARSON CITY, NV 89702

**Total Acres:** 520.8 **Total Ag Acres:** 0 **Total Square Ft.:** 0

**Vesting Doc #:** 99313

**Vesting Doc Year:** 4 **Vesting Doc Book:** 192 **Vesting Doc Page:** 504

**Map Doc#'s:** , , , ,

### Improvements

Sngl- Fam Detached      0    Non-Dwell Unit    0    Sq ft Garage.    0    Att/Det

Sngl- Fam Attached    0    MH Hookups        0    # Bdrms.    0    # Baths.    0

Multi- Fam Units      0    Wells                0    # of Stories                    0

Mobile Homes          0    Septic Tanks        0    Sq Ft Basement                0

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Total Dwell Units: **0** Sq Ft Bldgs **0** Sq Ft Fin Basement **0**

**Use/Appraisal Data**

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Current Land Use Code **100**  
Zoning Codes **F**  
Special Ownership Special Prop Class **0**  
Re-Appraisal Group **2** Factoring Group **0** Developer Discount  
Re-appraisal Year **2007** Orig Const. Year **0** Weighted Year **0**

**User-defined Fields**

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Type & Size of Garage Commercial Sq Ft. **0**  
Commercial/Res Sq Ft. (5) Commissioners district **2**  
Foundation Type  
Property on Truckee

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