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*INTERNATIONAL CENTRE FOR SETTLEMENT
OF INVESTMENT DISPUTES*

RIVERSIDE COFFEE, LLC

Claimant

v.

REPUBLIC OF NICARAGUA

Respondent

ICSID CASE NO. ARB/21/16

HEARING ON JURISDICTION AND MERITS

4 July 2024

Volume 4

Washington, DC

ARBITRAL TRIBUNAL

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09:03:00 1 PRESIDENT: Good morning, all. Good
2 morning, Mr. Gutiérrez.

3 MR. GUTIÉRREZ: Good morning,
4 Mr. President.

09:03:09 5 PRESIDENT: We have a few issues to
6 discuss in the beginning, so you don't need to listen or
7 follow this.

8 Mr. Appleton, we discussed yesterday the
9 deadline for the Claimant to respond to the Respondent's
09:03:29 10 motion to strike. Have you had a chance to consider?

11 MR. APPLETON: So, Mr. President, first
12 let me give an update -- I've already advised counsel
13 for the Republic of Nicaragua -- with respect to the
14 condition of Mrs. Rondón, who is our client
09:03:48 15 representative, because that's been a complicating
16 factor here. Fortunately, Mrs. Rondón was discharged
17 from the hospital last evening and is able to join us
18 here. It's essential that we're able to have
19 instruction from our client, and so we're delighted that
09:04:04 20 she could be here.

21 Unfortunately, we were unable to be able
22 to discuss with her last evening. Our first opportunity
23 to see her was just moments before the session began.
24 I've asked her if she needs any other special
09:04:18 25 accommodations so far with respect to this hearing. She

09:04:22 1 said no, but we will advise you if that changes. So I
2 just wanted the first -- I've extended the best wishes
3 from the Republic of Nicaragua and the Tribunal, and
4 again, I want to make sure that she knows that if
09:04:34 5 there's an issue, we don't want to force matters. If we
6 need to take a break or do something, we want to address
7 it before we have to send you back to the hospital.
8 She's nodding to say that she acknowledges that. That's
9 the first piece.

09:04:52 10 With respect to the timing, I am going to
11 need to have an opportunity to discuss matters in some
12 detail with Mrs. Rondón, so we're going to suggest that
13 we present our position on Tuesday. I would like to
14 have done it even earlier, but I'm going to need some
09:05:08 15 time. There's cases -- there are many different issues,
16 but there are some issues I would like to address
17 immediately because I think they will assist the
18 Tribunal on matters that go to the issue of conduct of
19 counsel.

09:05:23 20 And when we go to some of these, I'm going
21 to want to put as much of this on the record as I can
22 but it will require something that's going to be
23 confidential. So I want you to be advised of how I
24 intend to proceed very briefly this morning because
09:05:38 25 there's some very serious allegations that we believe

09:05:41 1 are completely non-meritorious and we want the Tribunal
2 to be immediately aware of them. Because I think it is
3 relevant -- very relevant. And when conduct becomes an
4 issue and there's going to be for sure issues of conduct
09:05:57 5 that are going to be before you in this case for your
6 consideration on issues of good faith, treaty
7 observation and the conduct of counsel, that we want to
8 make sure that you are very clearly understanding of the
9 issues because there are very serious matters that are
09:06:16 10 going to come before you.

11 So since this has been raised, we think
12 it's very important. What I want to go through with you
13 is, in particular, two matters that have been raised by
14 the Republic of Nicaragua, I would say in a most
09:06:35 15 irresponsible manner, but I'm going to raise them
16 specifically so you can see.

17 PRESIDENT: Mr. Appleton --

18 MR. APPLETON: I'm going to ask that this
19 part goes into confidential because I want to discuss
09:06:48 20 protected information.

21 PRESIDENT: Mr. Appleton, the only issue
22 we wanted to discuss this morning with you is when would
23 you like to respond to the application.

24 MR. APPLETON: I'm saying there's one part
09:06:58 25 I'd like to respond to right now. That's why I'm --

09:07:01 1 PRESIDENT: We want to have a response in
2 writing because the submission was made in writing.
3 What we should discuss is now the deadline when you will
4 be prepared to respond. We don't want to waste the
09:07:12 5 Tribunal's or the hearing time now for discussing
6 something preliminarily.

7 MR. APPLETON: Mr. President, I'm sorry,
8 it's impossible for us to respond until we can deal with
9 some immediate procedural matters with you and it's
09:07:25 10 because of the nature of some of your orders of the
11 Tribunal. So I would ask -- I don't want to make the
12 Tribunal upset, but you need to give me a moment to be
13 able to discuss what is troubling us so we can respond
14 to you.

09:07:45 15 PRESIDENT: If there is a procedural
16 motion you would like to make, that is fine, we can
17 discuss procedural issues, but what we don't want to
18 discuss now is the substance of the application. That
19 is not timely. What we need from you is the deadline
09:07:56 20 when you are prepared to submit the response. But if
21 you have procedural issues to raise, those we can
22 discuss now, certainly.

23 MR. APPLETON: Yes, that is exactly it. I
24 was going to suggest that perhaps --

09:08:10 25 PRESIDENT: And if we have that

09:08:11 1 discussion, then we shouldn't have the witness here.

2 MR. APPLETON: That is exactly -- and I
3 was going to suggest that perhaps we go to closed
4 session to deal with that, but I leave it to you. If
09:08:22 5 you want to have -- I can try to deal -- I'll deal with
6 the procedural issue without the protected information,
7 but I was going to ask that we exclude the witness.
8 That was the issue I wanted to get to first.

9 PRESIDENT: So we will exclude the
09:08:36 10 witness.

11 Mr. Gutiérrez, there will be a procedural
12 discussion between the Tribunal and the parties which
13 you don't need to be involved in, so you'll be taken
14 back to your breakout room.

09:09:35 15 Mr. Appleton, as to whether we go to a
16 closed session or not, if you want to discuss -- if you
17 will discuss or need to discuss any protected
18 information, we should go to a closed session. Also, if
19 you are going to discuss personal information that
09:09:50 20 should be kept confidential, the same conclusion.

21 So if you are going to raise any of these
22 issues, we should go to a closed session now.

23 MR. APPLETON: I think it's safest for
24 perhaps five minutes we go to closed session just to
09:10:10 25 ensure that doesn't happen, though I'll try to keep it

09:10:15 1 as minimal or not have to deal with it. How does that
2 sound? All right. So I don't need to wave the card.

3 So, Mr. President, the first issue is that
4 in order to respond to the materials raised by the
09:10:30 5 Respondent, we need to have an opportunity to be able to
6 file some exhibits, and we're unable to file exhibits
7 normally because the record's been closed, and so we're
8 going to need the Tribunal's permission. So let me give
9 you some examples of the types of things that we're
09:10:48 10 talking about.

11 We're going to talk about specific
12 evidence of the visa application made by Mr. Enriquez,
13 who we call Jaime Vivas, to the embassy for his visa to
14 come to the United States, because that issue was raised
09:11:07 15 expressly by the Respondent and, of course, not only was
16 there a visa appointment made, but we reported it to the
17 Tribunal. So this goes to the conduct of counsel and we
18 made specific assurances to the Tribunal about the
19 process. We want to be able to show it.

09:11:22 20 Now, I can show you right now on the
21 protected screen, if you would like to see that, that
22 document, for example, or you could have us admit it.
23 But it's full of personal privacy information. So
24 that's why it's sensitive of the type of data. So it
09:11:39 25 has all types of personal data. So if you like, I can

09:11:42 1 put it on the screen now and you can see, or -- and then
2 you can decide if you're satisfied on that and you would
3 want it into the record or not.

4 PRESIDENT: Mr. Appleton, you referred to
09:11:53 5 Jaime Vivas? Didn't you mean Mr. Ferrufino?

6 MR. APPLETON: No. I am going to deal
7 with Mr. Ferrufino. The motion from the Respondent
8 deals with Mr. Ferrufino and deals with Mr. Vivas.
9 They've made a variety of requests. That's why I'm
09:12:06 10 saying the reason we need time is there are four or five
11 different requests for relief in here.

12 MS. GONZÁLEZ: I'm sorry, Mr. President.
13 Apologies. Our motion was to strike the testimony of
14 Mr. Ferrufino. We did not make allegations as to the
09:12:23 15 visa application of Mr. Vivas.

16 MR. APPLETON: I'm sorry. We'll pull up
17 the application. It says specifically we question
18 whether or not Mr. Vivas had this. We question the role
19 of counsel, how it was done. We want to be able to
09:12:37 20 prove that and then be in the position to be able to
21 deal with that. That is exactly in this application.

22 MS. GREENWOOD: Could you give us the
23 reference to that, please?

24 MR. APPLETON: Well, that's not in the
09:12:47 25 application either, but perhaps we could ask Mr. Ricky,

09:12:51 1 who's beside the Respondent or their team, to put it up
2 on the screen, the letter that was just sent, and then
3 we can look at that together. Because I don't have the
4 printout with me.

09:13:01 5 MS. GREENWOOD: I'm sorry, Mr. Appleton.
6 I'm not with you. What are you referring to when you
7 say the letter that was just sent? Do you mean --

8 MR. APPLETON: The application.

9 MS. GREENWOOD: The Respondent's
09:13:10 10 application, thank you.

11 MR. APPLETON: If we could put it on the
12 screen, we can talk about that.

13 PRESIDENT: Again, Mr. Appleton, the
14 purpose of this discussion is not to go to the substance
09:13:20 15 of the application; it's if you have procedural
16 concerns, procedural issues that you want to raise
17 now --

18 MR. APPLETON: Yes.

19 PRESIDENT: -- those, you can raise.

09:13:27 20 MR. APPLETON: So the question is -- and
21 then I'm going to talk about the issue specifically
22 about Mr. Ferrufino. Same thing.

23 So for Mr. Ferrufino, for example, we have
24 the document confirming his appointment for the meeting
09:13:39 25 at the embassy in Managua and also the letter of

09:13:42 1 rejection that he received after he did his -- after he
2 had his meeting.

3 And if you remember, previously we showed
4 you on the screen, to the witness, he confirmed that the
09:13:55 5 passport from the Republic of Nicaragua with his picture
6 on it was his.

7 So Mr. Ferrufino has -- you know, not
8 being able to read is, in essence, like a disability.
9 He is not able to read, and so he can see pictures and
09:14:13 10 images. He confirmed those. He also confirmed to this
11 Tribunal in his testimony that the witness statement had
12 been read to him and that it was read to him --

13 MS. GONZÁLEZ: I'm sorry to interrupt,
14 Mr. President. But he's already going into the merits
09:14:26 15 of the motion.

16 MR. APPLETON: No, I'm describing --

17 MS. GONZÁLEZ: Yes, you are.

18 MR. APPLETON: I'm describing exactly the
19 types of documents I am asking permission to be able to
09:14:31 20 file, Ms González.

21 PRESIDENT: Mr. Appleton, you will be able
22 to submit evidence in response to your application just
23 as the Respondent has submitted evidence in support of
24 its application. So that is not an issue.

09:14:44 25 MR. APPLETON: That's the first thing

09:14:46 1 because they didn't ask leave. That part of the record
2 was closed. We want to make sure that we are going to
3 have that opportunity to be able to do that. I don't
4 want there to be yet another objection because now
09:14:58 5 they're going to say that you're not allowed to file new
6 evidence that's responsive to our material. So that's
7 the first procedural matter we wanted to clear up.

8 PRESIDENT: You will be able to respond or
9 produce evidence in support of your response but not
09:15:13 10 evidence in support of the merits of the case.

11 MR. APPLETON: That's fine. We're not
12 asking to add new materials that way. We're asking
13 specifically with respect to the materials that are
14 raised in their application.

09:15:25 15 So if we're clear on that, then the
16 question is going to be how do you want us to treat
17 protected personal data, because we're going to have
18 some highly protected personal data, and so the question
19 really is going to be is it necessary for the Tribunal
09:15:44 20 to have that information before, the individual ID
21 number, the passport number, the birth date, or could
22 that be redacted when we provide it to you? Otherwise,
23 I have personal privacy data minimization.

24 Or do you want a process -- because also
09:16:04 25 the materials go into official records elsewhere in the

09:16:07 1 CAFTA zone, and there's a purpose for that. If it isn't
2 covered as protected information it goes to a variety of
3 governments automatically, and they have a variety of
4 ways of dealing with protected information, depending on
09:16:17 5 how it's designated.

6 So we've taken the position of trying to
7 designate it correctly under the terms of the CAFTA and
8 that process to be able to maximize the protection
9 across the board.

09:16:30 10 PRESIDENT: There are rules already in PO1
11 and in the CAFTA itself as to how to deal with protected
12 information. It is for you to apply those rules. The
13 Tribunal cannot advise you on how to deal with any
14 particular document.

09:16:45 15 If you want to go beyond the mechanism or
16 the rules for how to deal with protected information,
17 you may then choose to redact certain information if
18 it's so sensitive that it cannot be disclosed even to
19 the other side or to the Tribunal, that is your
09:17:04 20 decision, but the Tribunal cannot advise you on how to
21 apply these rules.

22 MR. APPLETON: That's not my question.
23 You have two potentially conflicting rules already in
24 your order is what I'm trying to get direction on. One
09:17:16 25 of your rules says please minimize personal privacy

09:17:19 1 information. The other one talks about the process for
2 protected information.

3 So I'm merely asking the Tribunal to
4 explain to me what is it that you want? I already have
09:17:28 5 the documents with all of their personal privacy
6 information, but if I provide it to you, I'm not meeting
7 your other instruction already in your rules about
8 minimizing it.

9 So all I'm asking you is how do you want
09:17:42 10 me -- I'm going to protect whatever I provide in any
11 event -- how do you want me -- in other words, if you're
12 interested in that full unredacted version, I'll provide
13 it.

14 If you want me to meet your provision that
09:17:57 15 says please minimize personal privacy information, also
16 in your procedural orders, then I will redact it.
17 That's why I'm asking for procedural guidance from you.
18 What do you need here?

19 And you could tell me later. You could
09:18:11 20 think about this and tell us so that we know when we
21 file this what it is now that you've given us permission
22 to file it. That's all. That's all I'm looking for is
23 procedural guidance.

24 PRESIDENT: As I said, the Tribunal cannot
09:18:25 25 advise the party how to prepare its submissions. The

09:18:28 1 rules are there. It's for you to apply those rules to
2 the best of your ability. If your application of the
3 rules is contested by the Respondent, the Tribunal will
4 rule in that situation. But we cannot provide advice in
09:18:44 5 the abstract.

6 What you may want to do is to consult the
7 other side and see whether you reach an agreement on the
8 information that needs to be produced in order for you
9 to be able to respond to the application that has been
09:19:03 10 made, but the Tribunal cannot provide advice in the
11 abstract.

12 MR. APPLETON: Okay. So then I'm going to
13 tell you what I'm proposing to do in particular. We are
14 going to follow your rule about the minimization of
09:19:15 15 personal privacy information because I'm telling you I
16 believe there's a conflict.

17 What we'll do, we will have -- if the
18 Tribunal orders the production of the original documents
19 after that, we were just going to let you know we have
09:19:28 20 that if that needs to be filed. But we will meet your
21 rule -- I'm just saying your existing rules conflict.
22 We will meet your rule about the protection of personal
23 privacy information first, but we're also advising and
24 we'll also put in writing that we also will retain the
09:19:47 25 original and, if ordered, we'll make that available as

09:19:50 1 well.

2 PRESIDENT: You can certainly explain that
3 in your submission, but it is, in the first place, the
4 Claimant's call to decide what information is necessary
09:19:58 5 for you to be able to respond to the application. That
6 is a call you have to make, and then you have to explain
7 which redactions you have made and why, if there are any
8 redactions.

9 If there is any protected information, you
09:20:14 10 simply need to designate that information as protected,
11 and then it will be treated accordingly in the
12 proceedings. That would be the way to go.

13 But we cannot advise you on which
14 information, which evidence is necessary for you to be
09:20:28 15 able to respond to the application.

16 MR. APPLETON: Okay. So we understand --
17 we just want to make sure everybody understands because
18 of the nature of this type of data, I just want to make
19 sure that we're handling it appropriately as we go
09:20:41 20 forward so that we don't make a mistake.

21 I think we can go off the confidential
22 side of this, and I simply want to -- can we go public
23 again?

24 MS. GONZÁLEZ: I'm sorry. Before you do
09:20:56 25 that, Mr. President, I just wanted to clarify. With

09:21:00 1 respect to Mr. Vivas, the only concern that we expressed
2 in our motion is about his ability to read. Since
3 Claimant did not disclose Mr. Ferrufino's ability to
4 read, we have concerns about Mr. Vivas and the process
09:21:16 5 of how his witness statement was created because we
6 don't know right now, since we did not call him for
7 cross-examination, how was the process of preparing his
8 witness statement and whether he can read or cannot
9 read.

09:21:29 10 We did not call him for cross-examination,
11 and, therefore, we are not contesting whether a visa
12 application for Mr. Vivas was submitted or not. That is
13 not the issue here. We are, however, concerned about
14 the process of obtaining a visa for Mr. Ferrufino since
09:21:46 15 he testified that he did not go for an interview, a
16 mandatory step for obtaining a visa, and Mr. Appleton
17 confirmed to us that his visa was rejected.

18 So that is the type of evidence that we
19 would like to see.

09:22:06 20 PRESIDENT: On this point, there was a
21 request in a footnote at page 7 of your application
22 stating that the Tribunal should also demand that
23 Riverside provide accurate and fulsome information
24 regarding the witness statement of Jaime Enriquez Cruz,
09:22:30 25 Jaime Vivas, I understand?

09:22:31 1 MS. GONZÁLEZ: Yes, correct.

2 PRESIDENT: Is that request maintained?

3 MS. GONZÁLEZ: It is because we don't know
4 exactly whether this person could read or not. We did

09:22:40 5 not call him for cross-examination, and therefore,

6 perhaps we'll be in the same situation as with

7 Mr. Ferrufino, where he could not exactly know even to

8 what witness statement -- statement we were referring to

9 when we were asking questions to him. He didn't seem to

09:22:59 10 understand the questions.

11 So we don't know how was the process of

12 preparing the witness statement of Mr. Vivas. We don't

13 know if he signed something that Claimant put in front

14 of him, and maybe he didn't even understand what he was

09:23:10 15 signing. We don't know if he can read or not.

16 PRESIDENT: Okay, understood. But let's

17 keep it procedural now. So you are making two requests:

18 motion to strike the evidence of Mr. Ferrufino, plus a

19 request that the Tribunal demands Riverside to provide

09:23:27 20 information about the preparation of the witness

21 statement of Mr. Enriquez Cruz.

22 MS. GONZÁLEZ: Yes. Thank you,

23 Mr. President.

24 PRESIDENT: This is one of the issues

09:23:40 25 raised earlier, Mr. Appleton. So those are the

09:23:43 1 applications you need to respond to.

2 Anything else you want to raise,
3 Mr. Appleton, in terms of procedure?

4 MR. APPLETON: Now that we have some
09:23:50 5 clarification, I think that makes it a little bit
6 easier. So we'll come back to you on that. We might
7 require, now that we've received this understanding now
8 from the Respondent, we may need to come back in
9 housekeeping.

09:24:05 10 I will need to consult on something
11 because the form and the approach done for Mr. Vivas'
12 statement was different. If you look at the statement,
13 you'll see that it was done before a lawyer or a notary,
14 and there's another whole process. So it may be that --
09:24:20 15 I'll come back to you. This adds a new wrinkle to this,
16 and all the issues are a little bit tricky because in
17 this part of the world it's still early, we can't reach
18 people, and so I will get back to you if I need
19 something further on that procedurally.

09:24:39 20 PRESIDENT: Okay.

21 MR. APPLETON: We still have time
22 because --

23 PRESIDENT: Thank you, Mr. Appleton. We
24 understand the hearing is underway. We have already
09:24:46 25 heard Mr. Ferrufino. His evidence is on record. So

09:24:48 1 this is not immediately urgent. But what we would
2 expect from you is your position on when you can submit
3 your response.

4 MR. APPLETON: But we gave that. I'm
09:24:58 5 sorry, you understand the date we gave you for the
6 response?

7 PRESIDENT: No, I don't think we have a
8 date for the response.

9 MR. APPLETON: Yes, Mr. President, I said
09:25:07 10 Tuesday.

11 PRESIDENT: I understood that on Tuesday
12 you would tell us when you can file. But you are
13 prepared to file already on Tuesday?

14 MR. APPLETON: Our position is that we
09:25:16 15 anticipate being in a position to file on Tuesday,
16 unless we would otherwise tell you something. Now this
17 may be a slight complication to that now that we
18 understand exactly what it is that the Respondent seeks
19 with respect to the application or the witness statement
09:25:34 20 of Mr. Vivas.

21 Again, we note that it's entirely
22 available to the Republic of Nicaragua to call
23 Mr. Vivas, and they chose not to. But I also take note
24 of their position here, and so we'll have an opportunity
09:25:50 25 to discuss that in the application.

09:25:52 1 PRESIDENT: Okay. Very good. So then a
2 deadline of next Tuesday, whatever the date is, fixed
3 for the Claimant to respond to the Respondent's motion.
4 Okay.

09:26:07 5 Anything else either party would like to
6 raise in terms of housekeeping before we continue with
7 Mr. Gutiérrez?

8 MR. APPLETON: I do, but it may be that
9 Ms. González has something. Since she gave us a big
09:26:20 10 surprise yesterday, I'd like to hear from her first.

11 MS. GONZÁLEZ: I don't have another
12 housekeeping matter. Thank you, Mr. President.

13 MR. APPLETON: Certainly if the parties
14 think that they're going to bring a motion or something,
09:26:30 15 it would be good, even if it isn't ready, to note it in
16 the housekeeping session at the beginning. I just think
17 that that would be fair for everybody so we can deal
18 with our time.

19 The parties were able to come to some
09:26:42 20 agreement about the starting time for the remote session
21 of Police Commissioner Castro, and so last evening I was
22 able to get confirmation from Ms. González of when the
23 facility could be available. I then transmitted that
24 information, but it was after business hours in Managua.
09:27:02 25 I have not heard back a confirmation because it's still

09:27:06 1 before business hours in Managua, but I'm hoping that
2 we'll be able to have everything confirmed for a much
3 earlier start with the parties being able to be there.

4 And I believe that the agreement was that
09:27:21 5 they would be getting things set up as of 8, which would
6 be 10:00 our time. I think the goal was perhaps to have
7 8:30 for transmission. Is that what it is, or do you
8 want transmission for 8?

9 MS. GONZÁLEZ: Mr. President, the Ministry
09:27:36 10 of Foreign Affairs opens at 8 a.m. in the morning. So
11 Mr. Castro will arrive there at 8 a.m., which is 10 a.m.
12 here. We suggested also that the observer for Claimant
13 can also arrive as early as 8 a.m. to go through
14 security, which is actually five, ten minutes. I
09:28:00 15 initially mentioned 20 just to have some room, but it's
16 very fast since the person is already in the system
17 because Mr. Appleton has provided the name of this
18 person.

19 But in case there are any complications or
09:28:15 20 any technical issues, we suggest that as early as 8:30
21 the cross-examination of Mr. Castro can start, if
22 needed, as early as 8:30.

23 PRESIDENT: Thank you, Ms. González. Yes,
24 that was the Tribunal's request, to have the time frame
09:28:35 25 when he would be available for examination so we could

09:28:38 1 start at the earliest at 10 a.m. our time.

2 MR. APPLETON: No, no. Let's go back.

3 They can't start, Mr. President, at 10 a.m. They can

4 only open the doors to start security. So the earliest

09:28:51 5 start we could have would be 10:30. That's exactly what

6 I'm trying to get through. They will open the building

7 at one time, but they have to get through security, get

8 to the room, do those things. So under no circumstance

9 should we start before the participants can get through

09:29:07 10 the security process, just like in this building. We

11 need to give them time to go from one side to the other.

12 PRESIDENT: Okay. So Mr. Castro will be

13 available as of 10:30 EST until the scheduled time,

14 which would be 12:45 p.m., and we can start at any time

09:29:28 15 during that time period, and that is what the Tribunal

16 wanted to hear.

17 MR. APPLETON: And then, again, I just

18 need to identify that we have not received confirmation

19 from our own person that they are available at that time

09:29:43 20 because of the late period of time that we received this

21 yesterday, but we are trying very much -- but it's still

22 too early in the morning in Managua to be able to do

23 that. But we will use our best efforts to do what we

24 can to make that, but we can't confirm that yet because

09:30:00 25 it's earlier than what we had done -- what we had

09:30:02 1 committed to. But we're trying.
2 PRESIDENT: Okay.
3 MR. APPLETON: And I don't see why that
4 wouldn't be possible right now, but I am not -- I'm just
09:30:10 5 not familiar with the situation. Thank you.
6 PRESIDENT: Understood. So please let us
7 know when that is confirmed.
8 MR. APPLETON: Very good.
9 PRESIDENT: Okay. Anything else,
09:30:20 10 Mr. Appleton?
11 MR. APPLETON: No, we have nothing.
12 MS. GONZÁLEZ: Same thing.
13 PRESIDENT: And there is nothing else from
14 the Respondent. So we continue with Mr. Gutiérrez. Can
09:30:31 15 you please bring him to the witness stand?
16 Luis Gutiérrez (continued)
17 PRESIDENT: Good morning, Mr. Gutiérrez.
18 MR. GUTIÉRREZ: Good morning,
19 Mr. President.
09:31:55 20 PRESIDENT: Your examination will now
21 continue from where we stopped last night, and it will
22 be the Respondent will be continuing to conduct that
23 examination. It will be for the Respondent to go on,
24 please.
09:32:23 25 MR. ZUNIGA: Thank you, Mr. President.

09:32:24

1

CONTINUED CROSS-EXAMINATION

2

BY MR. ZUNIGA:

3

Q. Good morning, Mr. Gutiérrez.

4

A. Good morning, sir.

09:32:36

5

Q. Do you recall that yesterday, before the end of the session, we were discussing the report, the 2016 report by engineer Jiménez?

6

7

8

A. Yes.

9

Q. And this is the document we were discussing yesterday, correct?

09:33:00

10

11

A. Yes.

12

MR. ZUNIGA: Please go to page 789 in the document. You only have the English version. I need the Spanish version for him and the English version for the Tribunal, please.

13

14

09:33:19

15

16

Q. Then we are going to continue discussing this report by engineer Jiménez.

17

18

You can see in the third paragraph on page 789 that engineer Jiménez refers to the fact that the desired root development is not there for the avocado plant, correct?

09:34:01

20

21

22

A. Yes.

23

Q. And, once again, in the last line it refers to the trees that were grafted and the saplings, correct?

24

09:34:23

25

A. Yes.

09:34:25 1 Q. Confirming what we discussed yesterday, that on
2 the field there were some trees that were not grafted,
3 correct?

4 A. Yes.

09:34:38 5 MR. ZUNIGA: Can we please go to the next
6 page, Ricky? And I'm going to focus on the third
7 paragraph.

8 Q. This is the next page of the same report. I am
9 going to ask Mr. Dyer to zoom in the third paragraph.
09:35:08 10 You can see here that engineer Jiménez refers to the
11 coffee plants in the field where the avocado was
12 planted?

13 A. No, it does not say there, sir -- it doesn't
14 refer to the avocado plant. It is -- or it does not
09:35:42 15 refer to the coffee plant. It is just referring there
16 to the guideline, sir, to the guideline where we see
17 there that there is no more coffee, not specifically the
18 44.75 hectares of avocado.

19 Q. Correct, but on the first line you can see that
09:36:07 20 engineer Jiménez is saying that avocado is slow.

21 A. Yes, and it also says based on a guideline -- a
22 no coffee guideline. It is referring to the expansion
23 of avocado where it was going to be developed.

24 Q. The reference to the slow nature of avocado in
09:36:35 25 this report by Mr. Jiménez means that the avocado is not

09:36:39 1 growing as expected.

2 A. It is indicating that avocado production takes
3 three years.

4 Q. Where is the reference to three years in this
09:36:53 5 paragraph?

6 A. It is not there, but since you know this is a
7 reference or a -- this is something that another
8 engineer is reading. So it was written by an engineer
9 and an engineer is reading it, so I understand it well.

09:37:10 10 Q. Just to confirm, in this paragraph engineer
11 Jiménez is saying, word for word, "avocado is slow,"
12 correct?

13 A. Yes, and I told you already why.

14 Q. It is slow to grow?

09:37:27 15 A. It is slow to grow until it reaches production
16 stage. That takes three years from the time it is
17 planted to production.

18 Q. It starts to produce after three years,
19 correct?

09:37:43 20 A. Exactly.

21 MR. ZUNIGA: Can we go to the fourth
22 paragraph now?

23 Q. Now we are looking at the fourth paragraph on
24 page 790, the same page.

09:38:10 25 This was on avocado project, correct?

09:38:12

1

A. Yes.

2

Q. And you, as well as all of the parties, were learning on the avocado crops, correct?

3

4

A. We knew quite a bit by then, sir.

09:38:27

5

Q. But you did not have any previous experience with avocado crops, correct?

6

7

A. No, but we did handle very well the agricultural part.

8

9

Q. I am going to read to you what we see in the first section of this paragraph.

09:38:45

10

11

"It should be remembered that the high densities in Peru and Chile occur in parcels in deserts with water management and, mostly, considerable pruning work. Since we are at a learning stage and seeking funding, we suggest not making a closed sow of avocado."

12

13

14

09:39:09

15

16

Engineer Jiménez is confirming that this is the learning stage, correct?

17

18

A. At a stage where we already knew a lot, and if you look at this, he's referring to deserts, fields and deserts, but let me remind you we have no deserts in Nicaragua.

19

09:39:37

20

21

22

Q. Mr. Gutiérrez, my question is about the assertion by engineer Jiménez that you were in a learning stage, correct?

23

24

09:39:52

25

A. I have already explained to you. You have

09:39:55 1 already asked me about learning four times. I already
2 explained to you that we have agriculture experience,
3 and as I mentioned before at the beginning, we are
4 always learning in life.

09:40:09 5 Q. And you started to learn about avocado in 2015,
6 correct?

7 A. With a great deal of agricultural experience.

8 Q. And you started to learn about avocado in 2015,
9 correct?

09:40:21 10 A. With a great deal of experience, sir.

11 MR. ZUNIGA: We'll go to page 791, the
12 next page, second paragraph.

13 Q. Now we are moving on to the next page of this
14 document, page 790 -- rather, 791, third paragraph.

09:41:18 15 Can you see, Mr. Jiménez that -- rather,
16 Mr. Gutiérrez, I apologize -- that engineer Jiménez is
17 referring to the ant problem, correct?

18 A. Yes, sir.

19 Q. The plantation, as it could be expected, had
09:41:37 20 some pest problems, correct?

21 A. No.

22 Q. There was no problem with the ants?

23 A. Ants belong to species known as sompopo, but
24 they were not causing any damage to the plantation
09:41:56 25 because ants are one thing and sompopo are a different

09:42:03

1 thing.

2 Q. I apologize. Just a second.

3 Engineer Jiménez is saying, and here I am
4 reading word for word, to "fight the ant problem,"

09:42:17

5 correct?

6 A. Correct.

7 Q. There it says "ant." If the ants were not a
8 problem, why did you need to fight them?

9 A. Let me ask you, are you familiar with ants?

09:42:30

10 Q. Mr. Gutiérrez, let me ask you questions.

11 A. I am answering you.

12 MR. ZUNIGA: Can we go to the second
13 paragraph, please.

09:43:00

14 Q. This is the second paragraph at 791 and you can
15 see that engineer Jiménez is including in upper case,
16 "In general, it is necessary to water a little more
17 often."

18 A. That's right.

09:43:17

19 Q. That means that the plantation didn't have
20 enough irrigation, correct?21 A. We did have irrigation, but he suggested doing
22 it more often.

23 Q. Because the avocado plants were lacking water?

09:43:32

24 A. They were not lacking any water. He just
25 suggested doing it more often. We had water all over

09:43:36 1 the field.

2 Q. But the avocado plants were not receiving
3 sufficient water, correct?

4 A. That's why he suggested doing it more often.

09:43:49 5 PRESIDENT: Please wait for --

6 Mr. Gutiérrez, please wait for a second before you start
7 answering the question. Otherwise, it will be very
8 difficult for the interpreter to follow, as we discussed
9 yesterday.

09:44:05 10 MR. MULLINS: Mr. President. I hate to
11 object, I do feel there's a little bit of badgering
12 here. The witness was asked the question multiple
13 times, and it seems like counsel doesn't like the
14 answer. I do feel that if he gets an answer to the
09:44:18 15 question, he ought to move on. He's simply badgering
16 the witness at this point.

17 PRESIDENT: The witness should still have
18 the patience to wait. Are you making a motion? To what
19 effect?

09:44:33 20 MR. MULLINS: I'm sorry, Mr. President.
21 It was a separate point to your point. Your point is
22 very well taken that there ought to be a pause. Again,
23 I think it's the same issue of the language. I was
24 simply asking the Chair to please ask the counsel to not
09:44:46 25 badger the witness. I feel like he's repeatedly asking

09:44:50 1 the questions and not appreciating the answer. That was
2 my objection. Thank you, Mr. President.

3 PRESIDENT: That is fair enough. To the
4 extent that, Mr. Zuniga, you only need to ask the
09:45:04 5 question once, except that if you don't get an answer,
6 then you can repeat the question, but if there is an
7 answer, please move on.

8 MR. ZUNIGA: Understood, Mr. President.
9 Thank you.

09:45:23 10 Q. Mr. Gutiérrez, Claimant has also introduced a
11 copy of a report drafted by Mr. Edwin Gutiérrez,
12 correct?

13 A. That is correct.

14 Q. You can see on the screen the report by
09:46:01 15 Mr. Edwin Gutiérrez?

16 A. Yes, sir.

17 Q. You mentioned this report in your second
18 statement, correct?

19 A. Yes.

09:46:22 20 Q. But you minimized the importance of this report
21 alleging that Mr. Edwin Gutiérrez is an accountant?

22 A. That is correct.

23 Q. And that he has no previous experience in
24 avocado crops?

09:46:39 25 A. Correct.

09:46:41 1 Q. And that he visited the plantation during his
2 free time. Is that right?

3 A. Yes, it is.

4 Q. Have you read this document in full?

09:47:00 5 A. Yes, correct.

6 MR. MULLINS: Can we put the document -- I
7 don't think on the record it shows the exhibit number.

8 MR. ZUNIGA: This is Exhibit C-434.

9 MR. MULLINS: Thank you.

09:47:27 10 MR. ZUNIGA: Next page, please. Next.

11 There we go. Second paragraph, please, Ricky.

12 Q. As you mentioned a couple of minutes ago, the
13 project was at a learning stage, correct?

14 A. It wasn't learning, sir. It was a project that
09:48:00 15 was already underway.

16 Q. Mr. Edwin Gutiérrez, in this paragraph that we
17 see on line -- the second paragraph of C-0434, page 6396
18 in Spanish, states the following:

19 "Mr. Carlos ..." -- and he is Mr. Rondón,
09:48:36 20 correct?

21 A. Yes.

22 Q. "... the head of the field engineer, Marlon
23 Gutiérrez, suggests the importance of a training in
24 management and cultivation of the Hass avocado ..."

09:48:57 25 A. Correct.

09:49:01 1 Q. "... in view of the fact that it only has
2 general knowledge and not specifically in avocado."

3 A. Correct.

09:49:14 4 Q. In other words, according to Mr. Gutiérrez, the
5 person in charge of the avocado field recognizes not
6 having specific knowledge on the handling of avocado,
7 correct?

8 A. Correct.

9 MR. ZUNIGA: Can you go to the conclusion?
09:49:39 10 I think it's the next page, Ricky.

11 Q. This is page 6597 of the same C-0434. Can you
12 see that this is the page with the conclusions by
13 engineer Gutiérrez?

14 A. Correct. And if you allow me, I can tell you
09:50:06 15 why that report is not valid.

16 Q. Let me ask you --

17 A. I am answering. I'm answering a previous
18 question that you asked me.

19 Q. Here again, Mr. Gutiérrez is referring at No.1
09:50:25 20 to the fact that training of the person in charge of the
21 field is required for the Hass project, correct?

22 A. Yes, it is correct. This is a report drafted
23 by Mr. Edwin, not myself.

24 Q. At conclusion No.2, it refers to the demise of
09:50:53 25 the nursery grafts, correct?

09:50:58

1 A. Yes.

2 Q. And this means that the grafts that the nursery
3 had were drying out, correct?

09:51:11

4 A. Well, let me explain what a graft is. A graft
5 is whenever you have a sapling and a graft stick. The
6 part of the graft stick died, that is to say, and the
7 part that had the root is still alive.

8 Q. And if the plant is not grafted with Hass
9 material, it will not yield Hass avocado?

09:51:37

10 A. Of course. This is just a delay in the
11 production process. There may be -- there will be a
12 delay in production, but you will always have a Hass
13 avocado. The graft is to have prompt production of
14 higher volume. That is the reason why you graft a
15 plant.

09:51:57

16 Q. At conclusion No.3, there is a reference to the
17 low development experienced by the Hass avocado,
18 correct?

19 A. Correct.

09:52:14

20 Q. And let us recall that when we were talking
21 about engineer Jiménez's report, he also referred to the
22 slow development of avocado, correct?

23 A. Correct.

09:52:34

24 Q. In the last section of the third conclusion,
25 Mr. Edwin Gutiérrez is referring to the Phytophthora

09:52:38 1 fungus that could be the reason why this is impacting on
2 the grafts, correct?

3 A. Let me tell you why this conclusion is not
4 right.

09:53:00 5 The Phytophthora affectation has to do
6 with high water accumulation. If you read what it says
7 there, that conclusion by Mr. Edwin, he is saying that
8 that might be due to the -- previous to the drought, the
9 three-month drought. So the Phytophthora affectation is
09:53:22 10 a result of the water adaptation. If you read what it
11 says there, he's saying that the development of avocado
12 Hass at Hacienda Santa Fé is due to the lack of water.
13 It means it was dry.

14 So if it was dry, there could not be a
09:53:42 15 Phytophthora impairment. Whenever there is Phytophthora
16 in the soil and high temperature, the Phytophthora dies.
17 The Phytophthora in the soil may live many years with
18 humidity. But he is saying that it is because of the
19 lack of water. That means that the soil was dry.

09:54:06 20 So how am I going to accept that
21 conclusion that it was due to lack of water that the
22 Phytophthora was impacting the crop when the
23 Phytophthora lives in the ground whenever there is high
24 water accumulation and that is when there is a problem
09:54:25 25 for the plants.

09:54:28 1 Q. Thank you. You just mentioned that there was
2 lack of water with a crop?

3 A. I did not mention that. I am telling you what
4 Mr. Edwin Gutiérrez, who is an accountant, wrote in that
09:54:45 5 report. And that's the reason why it lacks any
6 validity, and that is the reason why I did not accept
7 that report and I didn't put any mind to it. As an
8 attorney, would you follow what an accountant is telling
9 you?

09:55:08 10 Q. Conclusion No.3 reads:
11 "The low development experienced by the
12 Hass avocado, in Hacienda Santa Fé, is due to the lack
13 of water that occurred in the first three months of
14 2016." Correct?

09:55:23 15 A. Correct.

16 Q. Now let me ask you a question before you
17 respond --

18 MS. CONOVER: Could you please make a
19 pause between question and answer? We cannot have
09:55:33 20 overlaps because it affects the transcript and the
21 translation, please.

22 MR. ZUNIGA: Thank you.

23 Can we go to the next page, Ricky, please,
24 and blow up conclusions 14 and 15.

09:56:16 25 Q. Now we are on the next page of this report,

09:56:20 1 page 6598. And just for clarification for the record, I
2 am referring to the page numbers in the original Spanish
3 version. The translation into English has the wrong
4 numbering.

09:56:46 5 At conclusion No. 14, we see that engineer
6 Marlon Gutiérrez is mentioning that nurseries should be
7 indoors, correct?

8 A. Correct.

9 Q. They were not sufficiently protected, correct?

09:57:10 10 A. That is what Mr. Edwin Gutiérrez is stating in
11 his report.

12 Q. Conclusion 15 refers to the fact that there was
13 no certificate proving compliance with the phytosanitary
14 standards, correct?

09:57:30 15 A. That is what accountant Edwin is stating in his
16 report.

17 Q. You do not agree with his conclusions, do you?

18 A. No, I do not.

19 Q. Did you answer to this report?

09:57:48 20 A. Yes.

21 Q. How?

22 A. By reading the document of Mr. Edwin Gutiérrez.

23 Q. Did you send an email to Mr. Rondón indicating
24 that this was wrong?

09:58:07 25 A. I do not recall whether I sent the email, but I

09:58:13 1 am just going to ask you to read at the beginning where
2 he says that he assessed the plants that had been
3 planted starting at 2.5 years onwards, and then he is
4 also referring to La Frijolera. That is a lot that was
09:58:35 5 planted in 2016. This is for you to better understand
6 and assess when he's saying that he is analyzing the
7 lots that were planted starting at 2.5 years onwards.
8 And then this is the information coming from
9 La Frijolera.

09:58:54 10 Then to go back to my chart, to my table
11 where I presented the years for lot 8, El Mango,
12 La Frijolera in new areas and when they were planted --

13 Q. Thank you, Mr. Gutiérrez.

14 So you're saying in your second witness
09:59:14 15 statement that you did not follow the recommendations in
16 this report, correct?

17 A. No, sir. As I just explained to you.

18 Q. Mr. Gutiérrez, have you reviewed the expert
19 report by Mr. Odilo Duarte?

09:59:32 20 A. Yes, sir.

21 Q. And Mr. Duarte, in his report, includes
22 conclusions indicating that the avocado plantation had
23 some issues, correct?

24 A. Without knowledge because he was never in
09:59:52 25 Hacienda Santa Fé. He is not familiar with the

09:59:55

1 Hacienda.

2 Q. And Claimant in this arbitration has not
3 presented an expert report rebutting Dr. Duarte's
4 conclusions. Isn't that so?

10:00:13

5 A. Sir, I am an agricultural engineer.

6 Q. The Claimant has not even submitted a witness
7 statement from Rodrigo Jiménez, correct?

10:00:35

8 A. Yes, sir. But I am the agronomist for the farm
9 and the one who was at the head of that project on a
10 day-to-day basis and the one who analyzed it and who
11 oversaw it on a day-to-day basis.

12 Q. I understand, Mr. Gutiérrez, but my question
13 was otherwise. The Claimant has not submitted a witness
14 statement from Mr. Rodrigo Jiménez, correct?

10:00:51

15 A. That, I don't know. You can ask the lawyers.
16 I answer based on my statement as an agronomist.

17 MR. MULLINS: This is another example, and
18 I object, of the counsel just simply not liking the
19 answer that he's getting from the witness. He's asked
20 the question multiple times.

10:01:03

21 PRESIDENT: I don't think it was exactly
22 the same question, but please go on, Mr. Zuniga.

23 MR. ZUNIGA: Thank you, Mr. President.

10:01:23

24 Q. In your second expert -- in his second expert
25 report, Mr. Duarte refers to the question of the

10:01:28 1 selection of seed, correct?

2 A. That is right.

3 Q. And you recognize that the adequate selection
4 of seed is very important, correct?

10:01:40 5 A. Yes, that's right.

6 Q. And he also makes reference to the fact that
7 Mr. Rondón was going to obtain seed from Mexico,
8 correct?

9 A. I am aware of that.

10:02:03 10 Q. Nonetheless, INAGROSA then decided to use its
11 own Hass avocado seeds, correct?

12 A. Yes, correct.

13 Q. You know that using Hass avocado seeds is a
14 risk on the plantation?

10:02:23 15 A. It depends on where you're going to plant it.
16 In Peru, they plant avocados in sandy areas. We have
17 rich soils such that it was feasible to use our own
18 seeds.

19 Q. And you know that Hass avocado is not a variety
10:02:50 20 of avocado that is resistant to Phytophthora, correct?

21 A. No, sir.

22 Q. He also makes reference to the fact that
23 apparently --

24 PRESIDENT: Excuse me. Can you just
10:03:10 25 clarify your answer? The question was:

10:03:13 1 "You know that Hass avocado is not a
2 variety of avocado that is resistant to Phytophthora,"
3 whatever that is.

4 MR. ZUNIGA: Phytophthora.

10:03:24 5 PRESIDENT: Okay. And the question was:
6 "Is that correct?"

7 You said no. Are you saying that it's not
8 correct, or is it correct?

9 MR. GUTIÉRREZ: The Hass variety is not
10 resistant to Phytophthora, but that is when it is
11 planted in flat areas. You can use the seed,
12 Mr. President, but it is not recommended to use it on
13 flat lands or flat lots.

14 MR. ZUNIGA: Thank you, Mr. President.

10:04:10 15 Q. As the reports by ingeniero Rodrigo Jiménez
16 indicate and also by Edwin Gutiérrez, which we've
17 reviewed, there was an issue -- a water issue at the
18 Hacienda Santa Fé, correct?

19 A. With respect to what? That there was water?
10:04:28 20 Yes, there were water sources that would emerge right on
21 the very property's springs.

22 Q. The avocado plantation wasn't receiving enough
23 water, correct?

24 A. It was receiving enough water.

10:04:53 25 Q. Did INAGROSA at some point order a hydro study,

10:04:58 1 correct?

2 A. Yes, that's right.

3 Q. From an engineer by the name of Federico
4 Sanabria, right?

10:05:06 5 A. Yes, he's from Costa Rica. He's a very good
6 engineer.

7 MR. ZUNIGA: Please put up C-87. I'm
8 afraid this doesn't have a translation, so we'll only
9 see the original Spanish version.

10:05:23 10 PRESIDENT: Okay. You need to then quote
11 for the record the relevant part that you are asking
12 questions to.

13 MR. ZUNIGA: Okay.

14 Q. This is the report drawn up by engineer
10:05:41 15 Sanabria. Is that right?

16 A. Yes, it is.

17 Q. And as you can see up above, it is marked as
18 Exhibit C-0087, correct?

19 A. That's right.

10:05:57 20 Q. Do you see any date on this cover page of this
21 document?

22 A. I don't.

23 Q. Do you see any date showing when this report
24 was drawn up?

10:06:14 25 A. It says there that it was done in 2015.

10:06:25 1 Q. Do you see any date on this page?

2 A. No, not on this page.

3 Q. And on this one?

4 A. No, one cannot see a date.

10:06:51 5 Q. The same question, do you see any date on this
6 page?

7 A. No.

8 Q. And this is the last page of the report,
9 Mr. Gutiérrez. Do you see any date on this page?

10:07:10 10 A. No.

11 MR. ZUNIGA: Let's go to the second page
12 of the document, please, Ricky.

13 Q. We're going to go back to the second page of
14 the document. As you've indicated in the first
15 paragraph, it says in 2015, correct?

10:07:24 15

16 A. That's right.

17 Q. It doesn't make any reference to the specific
18 month of the year 2015 in which this report was
19 prepared, correct?

10:07:40 20 A. No, sir. It says 2015.

21 Q. And just for the benefit of the Tribunal, could
22 you confirm for me that in Nicaragua, there is what is
23 known as a dry season and a rainy season? Is that
24 correct?

10:07:57 25 A. That's right, and it varies depending on the

10:07:59 1 specific location. There are some places where the dry
2 season is shorter and others where it's longer. At
3 Santa Fé, there was only a 90-day dry season.

4 Q. And nowhere in this document can one determine
10:08:23 5 whether the study was done during the rainy season or
6 during the dry season, correct?

7 A. But I do understand that it was in the dry
8 season, in March.

9 Q. Where does it say it was in March?

10:08:40 10 A. It doesn't say so in the document, but I know
11 so.

12 MR. ZUNIGA: Ricky, can we please go to
13 RER-01? That's Dr. Odilo Duarte's first expert report.

14 Q. Mr. Gutiérrez, as you can see up on the screen,
10:09:11 15 this is the first page of the first expert report by
16 Odilo Duarte. Do you see that?

17 A. Yes, I see it quite clearly.

18 Q. And you have confirmed that you've reviewed
19 this document, correct?

10:09:23 20 A. That's right, just as I did the report by
21 Edwin Gutiérrez.

22 MR. ZUNIGA: Can we go to paragraph 8.5.4,
23 please. 8.5.4. Ricky, I think you only have the
24 English versions up. Those are duplicates. Can you
10:10:11 25 please pull the Spanish version up for the benefit of

10:10:15 1 Mr. Gutiérrez?

2 Q. We're looking at paragraph 8.5.4 of the first
3 expert report by Mr. Duarte, correct?

4 A. Correct.

10:10:47 5 Q. And in this paragraph, Mr. Duarte states the
6 following:

7 "One problem of the study drawn up by
8 Mr. Sanabria ..."

9 You understand that's what he refers to in
10:11:05 10 this paragraph?

11 A. Exactly.

12 Q. "One problem would be that, during the dry
13 season (the months featuring the lowest rainfall
14 levels), one would be consuming all of the water
10:11:20 15 available from the water sources identified by
16 Mr. Sanabria to irrigate the avocado plants, which could
17 cause problems with neighboring farms if they depend on
18 the same water sources to irrigate their own crops."

19 Did I read that correctly, Mr. Gutiérrez?

10:11:41 20 A. Yes, that is what Mr. Odilo says.

21 Q. And just to confirm, were there neighboring
22 farms alongside the Santa Fé farm?

23 A. I'm going to answer. Mr. Odilo Duarte mentions
24 the months without knowing how long the period lasts and
10:12:02 25 where the Santa Fé farm is situated. There were other

10:12:09 1 farms that do not use that water because these are
2 waters where the springs are on the farm and we've
3 reinforced in order to protect it.

4 Q. There wasn't a technified (sic) irrigation,
10:12:27 5 right?

6 A. A river goes by, so there was no need for us to
7 use it. That river was used to generate electricity at
8 a plant called Antioquia.

9 Q. You've recognized that the Rio El Diamante,
10:12:54 10 which goes through the farm, is an intermittent river,
11 correct?

12 A. Yes, sir, because the river that goes through
13 the Santa Fé farm, it's been known by the grandparents,
14 great grandparents and so forth as the Rio Grande de la
10:13:12 15 Paz.

16 Q. And this river known as Rio El Diamante, which
17 you recognize is an intermittent river, in your own
18 words, is a river that is only active during the rainy
19 season. Is that right?

10:13:22 20 A. Yes, that is right. There's a map that
21 reflects where the community known as El Diamante is
22 where that river goes by and that is why it's called the
23 El Diamante River. It's intermittent, and this can be
24 noted in the maps.

10:13:41 25 Q. Was it your understanding when you read this

10:13:43 1 report that Odilo Duarte identified a serious problem
2 that could occur with respect to the use of water at the
3 Hacienda Santa Fé? Is that correct?

4 A. Yes, it is correct. He gave his references
10:13:59 5 without knowing the farm.

6 Q. And your response to the serious environmental
7 problem identified by Mr. Duarte was that it wasn't
8 important because the neighboring farms were not large
9 and did not require large amounts of water, correct?

10:14:22 10 A. As I told you, sir, the closest farm to
11 Santa Fé farm is a 200-hectare farm called
12 San Francisco.

13 MR. ZUNIGA: Ricky, can we please go to
14 CWS-10, paragraph 263.

10:14:55 15 Q. This is your second witness statement, correct?

16 A. Yes, it is.

17 Q. We're going to go to paragraph 263 for just a
18 moment. Here in this paragraph 263 of your second
19 witness statement, you recognize, first, that you've
10:15:55 20 read the section of Dr. Duarte's report that refers to
21 water, correct?

22 A. Yes.

23 Q. And as we've mentioned, your response to
24 Duarte's conclusion regarding the potential
10:16:17 25 environmental threat that could occur due to the

10:16:23 1 scarcity of water is that if all of the water were used
2 to irrigate the Hass avocado plantation during the dry
3 season, which is when there's the least water, correct?

4 A. That's right, but we didn't have that problem
10:16:50 5 of water scarcity at Santa Fé.

6 Q. It would cause problems with the neighboring
7 farms if they depended on the same water, correct?

8 A. That is what Mr. Duarte said in his paragraph.

9 Q. And your response is that the neighboring farms
10:17:14 10 were not large-scale agricultural producers?

11 A. Yes, that's right. I'm referring to a variety
12 of products.

13 Q. Animals also need water, right?

14 A. But that is not a livestock area, sir.

10:17:29 15 Q. Do you recall that yesterday we were talking
16 about or we made reference to Mr. Rondón having
17 presented two applications to have Hacienda Santa Fé
18 declared as a private wildlife area, correct?

19 A. He presented or submitted a form for an
10:17:51 20 evaluation to be done.

21 Q. And in a private wildlife area, well, there are
22 animals, right?

23 A. It was not a reserve, but yes, we did keep it
24 protected. The animals -- well, it's prohibited -- it
10:18:09 25 was prohibited. Those invaders destroyed everything.

10:18:12 1 It was prohibited to cut the trees in the forested areas
2 and also hunting animals was strictly prohibited before
3 when we had it.

4 Q. Another aspect mentioned by Dr. Duarte in his
10:18:33 5 reports is the lack of managerial supervisory personnel
6 with the necessary experience for managing an industrial
7 avocado plantation. Do you recall that?

8 A. Yes, sir. We had the personnel because we had
9 just established 44.75 hectares and the personnel we
10:18:54 10 had, well, we were trained to handle that. As we were
11 going to expand, we were going to take on more
12 personnel.

13 Q. And just to confirm something you've told us,
14 you were the agronomist in charge of the farm, correct?

10:19:08 15 A. Yes, that's right. That's why Mr. Edwin
16 Gutiérrez's report is not valid because I am the
17 agronomist who was in charge of the project, sir.

18 Q. And we've already seen how Mr. Edwin Gutiérrez
19 makes reference to the person in charge of the field,
10:19:34 20 Marlon Gutiérrez, asked for training because he does not
21 have specific knowledge of avocados, correct?

22 A. That is correct. I can explain to you what it
23 means to say he was the one responsible in the field.
24 Let me explain.

10:19:54 25 He was responsible for supervising the

10:19:56 1 workers to make sure that they would do what I would
2 instruct them to do. He was not the person in charge at
3 the plantation. He was the one responsible for making
4 sure that the workers would do what I would instruct, me
10:20:13 5 being the agronomist.

6 Q. Mr. Gutiérrez, you've also confirmed that
7 Mr. Rodrigo Jiménez, the Costa Rican consultant, only
8 visited Hacienda Santa Fé four times in five years,
9 correct?

10:20:31 10 A. Yes, he's seen it four times, but we were
11 always in constant contact by phone.

12 MR. ZUNIGA: Ricky, we can take this down,
13 please. Could you pull up CWS-02, paragraph 174,
14 please?

10:21:00 15 Q. Mr. Gutiérrez, we now have up on the screen
16 your first witness statement. Do you see it?

17 A. Oh, yes, I do.

18 Q. And I'm going to ask Mr. Dyer to take us to
19 paragraph 174.

10:21:29 20 Mr. Gutiérrez, you have stated in your two
21 witness statements that in 2017, there was a successful
22 avocado harvest, correct?

23 A. Correct.

24 Q. But you have not presented any evidence of that
10:21:48 25 supposed successful harvest, right?

10:21:50 1 A. We did not present it, sir, because, well, you
2 know, the farm was invaded and all of our records,
3 documentation and computers where we had the information
4 were stolen by the paramilitary invaders.

10:22:10 5 MR. ZUNIGA: Can we go to paragraph 150,
6 please, Ricky.

7 Q. And it is your statement that -- or testimony
8 that they expected yields of 20 kilograms per tree for
9 two-year-old trees and more than 50 kilos per tree as of
10:22:34 10 the third year, correct?

11 A. Correct. I'm referring to the second year of
12 production, and the first year production and so second
13 year was second production.

14 Q. The second year production is not the second
10:22:57 15 year counted from when the tree was planted?

16 A. No, it's not from the time it was planted.
17 It's from the first to the second harvest.

18 Q. Bearing in mind the year the tree was planted,
19 when would the first harvest be?

10:23:18 20 A. Approximately two and a half to three years is
21 the first harvest, and the second harvest will be in the
22 fourth year. From three and a half to four years from
23 the time it was planted. That is when we expected those
24 estimates to materialize -- or that estimate.

10:23:42 25 Q. And in your second statement -- in your second

10:23:49 1 statement you state that in 2017, the trees yielded more
2 than 60,000 avocados?

3 A. That's right, on its first harvest, sir.

4 Q. So just to confirm what you said, the first
10:24:13 5 harvest would be two and a half to three years from when
6 it was planted?

7 A. The first harvest.

8 Q. And the second harvest is as from the fourth
9 year?

10:24:23 10 A. After the first harvest, the flowering process
11 begins.

12 MR. ZUNIGA: Can we move to paragraph 284,
13 please, Ricky?

14 Q. This is your second witness statement, correct?

10:24:42 15 A. Yes.

16 Q. And as we've mentioned, at paragraph 284 you
17 mention that in 2017, the trees produced more than
18 60,000 fruits of avocado, correct?

19 A. Correct.

10:25:13 20 MR. ZUNIGA: Can we go to paragraph 215,
21 please, Ricky?

22 Q. And in this second statement, Mr. Gutiérrez,
23 you included a timeline for planting, correct?

24 A. Correct.

10:25:27 25 Q. We're going to wait for Mr. Dyer to put --

10:25:36 1 bring this up.

2 PRESIDENT: Mr. Zuniga, we can break in
3 the next five minutes unless you can finish in the next
4 ten, 15 minutes.

10:25:49 5 MR. ZUNIGA: No, I'm going to need a
6 little bit more than that, Mr. President. But I also
7 wanted to ask for permission to use the white board. I
8 want to make some brief calculations making specific
9 references to data provided by Mr. Gutiérrez. Is that
10 okay? And we've consulted with the technicians.

10:26:01 11 They've ensured us that the camera will be able to look
12 at the white board.

13 PRESIDENT: That's fine. And we can then
14 take photographs if necessary for the record. You want
10:26:14 15 to do that now or after the break?

16 MR. ZUNIGA: I can do that now, and then
17 after I'm done, we can take the break.

18 PRESIDENT: That's fine.

19 Q. Mr. Gutiérrez, do you see the Spanish language
10:26:31 20 version of this table which, as you have admitted, you
21 yourself prepared? Correct?

22 A. Correct.

23 MR. ZUNIGA: Ricky, can we please go just
24 on the Spanish version to the next page because the
10:26:43 25 table is split. I want to see the numbers -- there we

10:26:46 1 go. Thank you.

2 This is page 43 of the Spanish version.
3 In the translation the full chart can be seen on
4 page 39.

10:27:04 5 Q. I'm now going to step up to the board. Let's
6 see if the court reporter can hear me okay.

7 PRESIDENT: If you speak, you need the
8 microphone, but if you just make calculations and then
9 go back and speak from there, that's also fine.

10:27:36 10 MR. ZUNIGA: Okay.

11 (Testing microphones)

12 Q. Mr. Gutiérrez, you prepared this table and,
13 according to it, this is the Hass avocado plantation
14 program for 2014 to 2018 --

10:29:59 15 PRESIDENT: Which table are you referring
16 to?

17 MR. ZUNIGA: This is table A on page 36 of
18 the Spanish -- I'm sorry -- 43 of the Spanish original
19 of Mr. Gutiérrez's second witness statement.

10:30:17 20 PRESIDENT: And the English?

21 MS. GREENWOOD: Paragraph 215 of the
22 English witness statement.

23 Q. Mr. Gutiérrez, if I can please ask you to
24 confirm that the number of trees that are included here
10:31:34 25 on the flip chart match the numbers that you included in

10:31:40 1 your chart A or table A of your statement?

2 A. That's right, sir.

3 Q. You say that in 2014, 5,948 trees were planted?

4 A. That's right.

10:31:53 5 Q. In 2015, 1,404?

6 A. That's right.

7 Q. In 2016, 4,792, correct?

8 A. That's correct.

9 Q. And in 2017, 5,756, correct?

10:32:14 10 A. That's correct.

11 Q. You said in 2017, INAGROSA had a very

12 successful crop of Hass avocado. Is that right?

13 A. Yes.

14 Q. You also said that the first crop happens when

10:32:32 15 the trees are between two and a half years old and

16 three years old counted from the year the tree is

17 planted, correct?

18 A. Correct.

19 Q. If we would like to calculate how many trees

10:32:46 20 were yielding fruit in 2017, you'd agree with me that we

21 cannot count the trees that were planted in 2017?

22 A. No, we can't.

23 Q. We can only have into account those planted in

24 2014 and 2015, correct?

10:33:02 25 A. Please ask the question again.

10:33:11 1 Q. For the 2017 harvest, the trees planted in 2014
2 were yielding fruit, correct?

3 A. Yes, it was one of the ones that bore fruit.

4 Q. For the 2017 harvest, the trees planted in 2015
10:33:30 5 were also yielding fruit, right?

6 A. Yes. Well, the 2015 ones were not producing in
7 2017.

8 Q. They were not producing fruit?

9 A. No. They were going to start yielding fruit
10:33:46 10 when they were planted, so in 2017, well, the first
11 harvest was from the trees from 2014.

12 Q. So it would be correct to assume that the trees
13 planted in 2016 were not going to yield fruit in the
14 2017 harvest?

10:34:04 15 A. Not in 2017, but by the time all that was
16 producing.

17 Q. So in 2017, only the trees planted in 2014 were
18 yielding fruit?

19 A. That's right. And in 2014 we were going to add
10:34:25 20 the lot of the 2015 trees.

21 Q. And you have stated that in 2017, the trees
22 yielded more than 60,000 avocados, correct?

23 A. Yes, this was part of the year 2014.

24 Q. So we're going to divide the number of fruit of
10:34:51 25 the 2017 harvest by the number of trees that were

10:34:55 1 yielding fruit during that year?

2 A. Okay, sir.

3 Q. And that's going to give us the number of fruit

4 produced by each tree, right?

10:35:05 5 A. Okay, sir.

6 Q. I studied law and not agronomy, so I'm going to

7 use a calculator to do the calculation.

8 A. Yes, you can do that, sir.

9 Q. If the members would like to verify if my math

10:35:34 10 is right, you can do the same.

11 About, I would say, 10.08. That's the

12 exact number. So if we're talking about fruits, I'm

13 going to say ten avocados per tree. Is that correct?

14 We will round it up. And you have said in one of the

10:36:12 15 other reports you have prepared, and I am referring to

16 exhibit C-0653. Let's go to exhibit C-0653.

17 MR. ZUNIGA: Ricky, 0635 for the benefit

18 of the Tribunal.

19 Q. While the document is being placed on the

10:36:32 20 screen, I'm going to make reference to that fact that in

21 that reference that was prepared by you, you indicate

22 that the average weight of each fruit is 250 grams per

23 avocado. Is that right?

24 A. That's correct.

10:36:45 25 MR. ZUNIGA: It's an Excel spreadsheet so

10:36:47 1 I'm going to the text and it says -- it says average
2 weight 250 grams per avocado.

3 Q. Very well then. 10 fruits per 250 grams.

4 MS. GONZÁLEZ: Excuse me. Could you
10:37:12 5 please say the exhibit number again?

6 MR. ZUNIGA: (Inaudible)

7 As we can see on the screen -- sorry, this
8 is in Spanish --

9 Q. Sir, this is exhibit C-0365 that you prepared,
10:38:01 10 right?

11 A. Right.

12 Q. There is a note here, and we can see it, and
13 the note says that 40,000 avocados were sent to the
14 present plant and 20,000 avocados were used for seed in
10:38:17 15 the Hacienda's nursery, correct?

16 A. Yes.

17 Q. And then it says the average weight is per
18 unit. All of the fruit was weighted, and the average
19 weight was in accordance with the collected amount?

10:38:34 20 A. Sir, these 4,000 fruit for the processing plant
21 for Santa Fé was 10 hectares. I'm not making reference
22 to the 14.74 hectares that were planted in 2014. I can
23 explain why if you ask me.

24 Q. Correct. I'm talking about the weight. The
10:38:55 25 weight that you're indicating on this chart. If we look

10:38:59 1 at the second entry here, you talk about average grams
2 per fruit, 250, correct?

3 A. That's right.

4 Q. Using this information, the information you
10:39:12 5 have provided to us, we multiply this per the 10 avocado
6 fruits per tree that we have obtained. This means that
7 each tree has produced 2.5 kilograms of fruit in 2017,
8 correct?

9 A. That's right. On this chart you're making
10:39:38 10 reference to the 5,000 odd trees, right.

11 Q. That's right. The trees that bore fruit in
12 2017. That is the only thing I'm making reference to.

13 A. Okay. 10 hectares. Each hectare has 400
14 trees, right?

10:40:03 15 Q. I understand that, and your lawyer will allow
16 you to expand on that. But out of this chart, the only
17 thing that I need from you is what you stated, that is
18 to say, the average weight of each fruit. That's the
19 only information I'm interested in on this chart that
10:40:21 20 you have provided to us, correct?

21 A. Correct.

22 Q. In 2017, each tree produced 2.5 kilos, so we're
23 multiplying 10 avocados per tree by the 250 grams that
24 you declared was the average weight of each fruit,
10:40:37 25 correct?

10:40:37

1

A. That's right. Well, sir, this is your analysis, Mr. Lawyer.

2

3

Q. According to the numbers, right, Mr. Gutiérrez?

4

A. Where are you getting those numbers from?

10:40:51

5

Q. We have conducted a very easy calculation on the basis of your information, and we see that in 2017, each tree produced 2.5 kilograms of fruit, correct?

6

7

8

A. Yes.

9

10:41:12

10

Q. You have told us that you started planting lettuce and also cabbage in your family lands and then you sold those in the Jinotega market?

11

12

A. That's right.

13

Q. So you have an idea of what it is to sell fruit to obtain profits and what a good business is?

14

10:41:28

15

A. That's right.

16

Q. And, as you've said, you expected between 20 and 50 kilograms. That would be the yield for the avocado trees?

17

18

19

A. Yes, as of the second year of harvest.

10:41:44

20

Q. Okay. The second year.

21

A. But this is the first year, Counselor.

22

Q. 2.5 kilograms per tree, that's the fruit yield for 2017, correct?

23

24

10:42:10

25

A. That's right. Well, that's what you're writing there.

10:42:12 1 Q. Is that a successful harvest?

2 A. It was the first production cycle, sir. That's
3 your calculation, and then I'm going to explain my part.

4 MR. ZUNIGA: I can go back to my seat now.

10:42:34 5 PRESIDENT: I think we should break now
6 for 15 minutes, unless you have immediate follow up
7 questions?

8 MR. ZUNIGA: No, I think the numbers speak
9 for themselves. Thank you.

10:42:42 10 PRESIDENT: So we are going to break now?

11 MR. ZUNIGA: Yes.

12 PRESIDENT: Let's break now for 15 minutes
13 until 11:00.

14 *(Brief Recess)*

11:04:30 15 PRESIDENT: Okay. We will resume. Please
16 proceed, Counselor.

17 MR. ZUNIGA: Thank you, Mr. President.

18 BY MR. ZUNIGA:

19 Q. Mr. Gutiérrez, you have stated that you were
11:05:03 20 expecting to have another successful harvest in 2018,
21 correct?

22 A. Correct.

23 Q. Mr. Gutiérrez, INAGROSA was not able to sell or
24 export not a single avocado, correct?

11:05:32 25 A. Correct, sir.

11:05:37 1 Q. They did not sell or export one single avocado
2 from the successful harvest in 2017?

3 A. No, because we used a plant to produce oil.

4 Q. They did not sell or export a single avocado
11:05:58 5 from the harvest of 2018?

6 A. No, sir, because that harvest was stolen.

7 Q. You even state that the 2018 harvest, or
8 whatever was collected in 2018, had to be given away and
9 distributed among friends, neighbors and relatives,
11:06:28 10 correct?

11 A. Yes, because the country was going through a
12 civil strife, and there was no access to Managua.

13 MR. ZUNIGA: Ricky, could you please put
14 up Exhibit C-431, please? I believe we don't have an
11:07:04 15 English translation of this. Or do we? I don't
16 remember.

17 Q. Mr. Gutiérrez, this is an email that you sent
18 to Mr. Rondón on July 29, 2018, correct?

19 A. Yes.

11:07:24 20 Q. And this is the email that is at the bottom of
21 the screen, correct?

22 A. What do you want me to confirm, the date?

23 Q. Yes, the date, please?

24 A. There it says that it is July 29, 2018.

11:07:47 25 Q. In this email you are referring to the 2018

11:07:51 1 harvest, correct?

2 A. Whatever we could barely collect.

3 Q. And in connection with that fruit that you were
4 able to harvest, you informed Mr. Rondón that you have
11:08:09 5 the fruit on the ground in a warehouse, correct?

6 A. Yes, because the Santa Fé facilities had
7 already been taken away by the invaders.

8 Q. There is no reference to that warehouse being a
9 refrigerated warehouse?

11:08:35 10 A. No, sir, because this was not in Santa Fé.
11 This was a warehouse in my own home, at home.

12 Q. Was there a refrigerated warehouse in Hacienda
13 Santa Fé?

14 A. Yes, and it had already been taken, it had
11:08:53 15 already been invaded in Santa Fé.

16 Q. In the last line of this email, you reminded
17 Mr. Rondón -- and let me read -- I do not have a way to
18 send -- that is, I don't have plastic or cardboard
19 boxes?

11:09:20 20 A. Yes, sir. As you know, by then, the Hacienda
21 was completely invaded by the paramilitary invaders. We
22 had no access to our supplies.

23 Q. Mr. Gutiérrez, you have stated that you
24 maintain constant contact with Mr. Rondón?

11:09:57 25 A. Yes, sometimes by phone calls or email.

11:09:59 1 Whenever I couldn't reach him, I would send him an
2 email.

3 Q. And in your first statement you referred
4 several times to the fact that you called Mr. Rondón to
11:10:15 5 keep him abreast of the situation?

6 A. As I mentioned before, I made phone calls
7 whenever we could because by then, the signal was quite
8 poor. So sometimes I sent emails whenever I couldn't
9 communicate with him over the phone.

11:10:33 10 Q. However, in your first witness statement
11 there's not a single reference to email communications,
12 correct?

13 A. That's why whenever we had calls, there was no
14 need for me to email him because I had already had the
11:10:54 15 direct conversation over the phone.

16 Q. And in your first witness statement you did not
17 attach a single email, correct?

18 A. Yes.

19 Q. You did attach emails to your first witness
11:11:14 20 statement?

21 A. Are you saying the first one? No. I don't
22 think so.

23 Q. Mr. Gutiérrez, you stated that the first
24 invasion was on June 16, 2018, correct?

11:11:32 25 A. Precisely. That's when it was.

11:11:35 1 Q. And in that first invasion, the invaders
2 occupied the upper part of Santa Fé, correct?

3 A. Correct.

4 Q. Later on there was a second invasion in 2016 --
11:11:54 5 2018, but this was June 16, correct?

6 A. Yes.

7 Q. And in this second invasion, the invaders
8 entered the lower part of Hacienda Santa Fé?

9 A. Correct.

11:12:10 10 Q. Basically, 30 days apart between the first and
11 the second invasion, correct?

12 A. Precisely.

13 Q. You also stated that your office and the
14 corporate offices INAGROSA had were in Casa Hacienda,
11:12:30 15 correct?

16 A. Yes.

17 Q. And Casa Hacienda is located in the lower part
18 of Hacienda Santa Fé, correct?

19 A. Yes.

11:12:41 20 Q. However, neither you nor any of the other
21 INAGROSA employees did anything to protect the records
22 and the corporate documents of INAGROSA?

23 A. No, sir, because when the invaders entered a
24 second time, I told them I was going to remove something
11:13:01 25 and they said no, that they were going to give that to

11:13:04

1 the police.

2 Q. You just said when the invaders went in the
3 second time.

4 A. Yes, the second time.

11:13:13

5 Q. But between the first and the second invasion,
6 there were 30 days -- there were 30 days, correct?

7 A. Yes.

8 Q. And there were laptop computers, correct?

9 A. In the lower part that was not invaded.

11:13:29

10 Q. And you did not take anything away?

11 A. No, we did not.

12 MR. ZUNIGA: I have no further questions
13 for you, Mr. Gutiérrez. Thank you very much.

14 MR. GUTIÉRREZ: I thank you, Attorney.

11:13:46

15 PRESIDENT: Thank you. Over to the
16 Claimant for redirect. Mr. Mullins?

17 MR. MULLINS: Thank you.

18 **REDIRECT EXAMINATION**

19 BY MR. MULLINS:

11:14:13

20 Q. Good morning, Mr. Gutiérrez. How are you?

21 A. Good morning. I'm a little bit better today.

22 Q. Do you need to take a break, or are you okay to
23 proceed?

24 A. I'm okay.

11:14:32

25 Q. Great. I'm going to ask you some follow-up

11:14:35 1 questions and, again, same rules -- please let the
2 translation -- although, I'll be honest with you, I
3 don't understand Spanish, so I don't think we're going
4 to have the same problem we had before.

11:14:50 5 A. Okay.

6 Q. The pause is going to work better here, I
7 think.

8 PRESIDENT: We hope so.

9 Q. You have been asked by counsel for Nicaragua if
11:15:04 10 you had prepared for your testimony. Did you meet with
11 lawyers in preparation for your testimony?

12 A. To take my statement? Yes.

13 Q. Right. And then -- and that's a fair point. I
14 want to make sure there's no confusion between preparing
11:15:27 15 for your witness statement and preparing for your
16 testimony today.

17 Did you meet with counsel for Riverside in
18 preparation for your testimony in the last couple of
19 days?

11:15:43 20 A. No, sir.

21 Q. When I say counsel, that includes myself,
22 Mr. Gutiérrez. Did you meet with me and Mr. Bart?

23 A. No, sir.

24 Q. I'm not sure you understand my question,
11:16:02 25 Mr. Gutiérrez.

11:16:03 1 You were in Washington the last couple of
2 days and meeting with counsel, correct? Including
3 myself and Mr. Bart? It's okay to --

4 A. I understood -- I was understanding that that
11:16:20 5 was with my previous -- when I provided my statement
6 before.

7 Q. I'm talking -- that's -- again, I want to make
8 sure we're clear. In terms of the preparation of your
9 statement and your testimony in the last couple of days,
11:16:40 10 you came and met with counsel before you testified,
11 including with me and Mr. Bart, correct?

12 A. That is right, sir.

13 Q. And I'm sorry if I caused you any confusion
14 because when we talk about testimony, I know sometimes
11:16:53 15 you're referring to your statement, and sometimes you
16 were talking about your testimony. So you did meet with
17 counsel, including myself and Mr. Bart and other lawyers
18 in preparation for your testimony, correct?

19 A. That is correct, sir.

11:17:12 20 Q. And you talk about your witness statements --
21 and just so we're clear, do you stand by the accuracy of
22 your statements with the additions that you've made?

23 A. That's right, sir.

24 Q. Let's go to your second witness statement,
11:17:41 25 paragraph 6. It's on page 1, but I think it's probably

11:18:19 1 the third page of the pdf. There you go.

2 If you read paragraph 6, it says:

3 "In preparing for this Reply witness
4 statement, I have read a working translation of
11:18:30 5 Nicaragua's Counter-Memorial, the expert statement of
6 Dr. Duarte and various witness statements filed by
7 Nicaragua. I also reviewed a Spanish language working
8 translations of the Memorial, the witness statements of
9 Carlos Rondón and the original Spanish witness
11:18:44 10 statements of Jaime Francisco Enriquez Cruz."

11 Do you see that, sir?

12 A. That is correct.

13 Q. And does this refresh your recollection of some
14 of the documents that you reviewed in preparation of
11:18:56 15 your witness statement? In other words, this is a true
16 statement, correct, that you reviewed those documents?

17 A. Perfectly, yes.

18 Q. Thank you, sir.

19 You testified that you started working at
11:19:24 20 Hacienda Santa Fé INAGROSA in 2014. Is that true?

21 A. That is right.

22 Q. But the Hass avocado project had already
23 started by then, correct?

24 A. That is true.

11:19:44 25 Q. And you've talked about your experience as an

11:19:49 1 agronomist and agricultural engineer. Can you tell the
2 Tribunal with more detail about what it is that you had
3 to study to get your degree?

4 A. Yes, sir. First, I studied for two years at
11:20:20 5 INATEC. That is an institute that is government run.
6 After that I graduated as a technician. This is a
7 government-run institution, and I worked and I continued
8 to study and I continued to study to obtain my degree in
9 agrarian sciences and I concluded my studies at the
11:20:51 10 university.

11 Q. And what university was that? Sorry. What
12 university was that?

13 A. UPONIC. That is the Popular Autonomous
14 University of Nicaragua but no longer like that because
11:21:09 15 it has been seized by the government.

16 Q. And in terms of your degree at the university,
17 what did you have to do to obtain that?

18 A. I went through a lot of sacrifice. I worked --

19 Q. I meant specifically about the studies you had
11:21:35 20 to do to obtain your degree.

21 A. I studied for several years. I had different
22 subject matters until I got to my thesis, and then I
23 finally received my diploma with a degree.

24 Q. And you talked about that you had done your
11:22:01 25 thesis beforehand. Can you tell us about that?

11:22:12 1 A. I completed my thesis, but because of the
2 financial situation...

3 Q. Correct. But can you tell us about the thesis
4 itself and how that related to your studies? Subject
11:22:33 5 matters?

6 A. Yes. The thesis is a final exam that we take
7 at the university to validate all of the three years'
8 studies at UPONIC. At the end, that thesis is the
9 evaluation of a project that includes all of the subject
11:23:04 10 matters and classes that I took at the university.

11 Q. Understood. And was it a specific area, or was
12 it various areas, the thesis?

13 THE INTERPRETER: Can you repeat that
14 question, sir?

11:23:18 15 Q. You said it was a final exam to validate your
16 three years of studies. Was it a number of areas that
17 was included, or was it a specific concentration?

18 A. It is a project, so everything that we learned
19 through the study period. And there we need to defend
11:23:46 20 the project, and that project is based on everything we
21 learned through our courses of studies at the
22 university.

23 Q. And you also had experience in just your
24 lifetime dealing with agriculture. Can you explain that
11:24:04 25 with more detail?

11:24:08 1 A. Yes, sir. At ten years of age, I started to
2 work. I am a person who grew up surrounded by
3 vegetables and animals. I learned to work with the
4 cows, to extract the milk at ten. And that's how I
11:24:40 5 developed this love to become an agricultural engineer.

6 Q. And can you tell us specifically your
7 experience in agriculture prior to working at INAGROSA?

8 A. As to the field, I had quite a bit because I
9 was studying -- not only studying behind a desk and on
11:25:12 10 paper, but as I studied, I put what I learned into
11 practice because from a very early age I had this love
12 for the fields.

13 Q. And what was specifically your experience in
14 the fields in terms of other crops?

11:25:30 15 A. Well, in the field one works directly with
16 plants. Plants are living beings, and one learns to
17 understand the plants. The plants express themselves.
18 As an agronomist, I know when a plant has a problem
19 because the plants have a way to express themselves.
11:25:53 20 They have a behavior, growth. They do not speak, but I
21 had the ability. I learned through my experience to
22 understand Mother Nature.

23 Q. Can you tell us how you feel your experience --
24 well, scratch that. Let me rephrase the question.

11:26:16 25 Counsel was asking about your specific

11:26:20 1 experience in avocados. Can you explain to us how your
2 education and your experience informed your ability to
3 as the agronomist -- the chief agronomist -- at
4 INAGROSA?

11:26:38 5 A. Yes. Mr. Carlos Rondón took a look at my CV,
6 my experience in the field, so I started -- I continued
7 to develop. When I arrived in Santa Fé, they saw how I
8 mastered the work in the field, in particular with
9 coffee, and they did realize that I had -- I was
11:27:09 10 mastering the situation, so I was promoted in 2015 to
11 the avocado project. And since I had an early
12 experience since very young, I didn't have any problems
13 in relating and starting to work with the avocado crop.

14 They gave me the opportunity to work on
11:27:32 15 such an important project which was highly profitable
16 and productive for the company.

17 Q. We've talked about some of the people that
18 worked at INAGROSA and some of the reports. Why do you
19 feel, of the people working there, you were the most
11:27:52 20 qualified person to opine as to the Hass avocado project
21 and its success?

22 A. Yes, sir. From the moment I was given that
23 responsibility, I was in charge of directing the
24 project. And Don Carlos -- Mr. Carlos trusted me
11:28:17 25 directly.

11:28:17 1 Q. And why do you feel that you're -- other than
2 Mr. Rondón's own opinion, what about yourself do you
3 feel that you were most qualified amongst all the
4 people?

11:28:42 5 A. Because back then Mr. Francisco Rivera was
6 there, and Francisco Rivera was one of the advocates for
7 me to get promoted because they saw how I solved the
8 issues at Hacienda and also how I offered the solutions.

11:29:11 9 Q. Mr. Gutiérrez, you were asked about INAGROSA'S
10 application for a private wildlife reserve. Did the
11 government ever formally register Hacienda Santa Fé as a
12 private wildlife reserve?

13 A. No, sir. That is I understand because I saw
14 the document that that was an evaluation, an assessment
11:29:37 15 of FINCA Santa Fé. It was not a reserve that was
16 approved. Approved meaning that once they're approved,
17 once these reserves are approved, the government
18 publishes them in the Official Gazette, indicating that
19 the wildlife reserve X has been approved and later on
11:29:58 20 that Hacienda would be labeled as such. And to that
21 end, there are a lot of procedures that need to be
22 completed. The FINCA has to be labeled as such once it
23 is approved by the government and it is recorded in the
24 Official Gazette.

11:30:22 25 Q. Were those completed?

11:30:25 1 A. No, sir. That was just left as an evaluation
2 of the farm. Don Carlos requested it so that they could
3 contact or look into the viability of the farm and to
4 see its condition in terms of the forest, the soils, the
11:30:40 5 climate, the water, the qualities of trees, animals and
6 so forth. All of that was reflected in that report by
7 Ms. Diana Hernandez.

8 Q. I'm going to be jumping around because there's
9 a lot of areas that counsel went through, so bear with
11:30:59 10 me. And I may go back and forth.

11 Now I want to ask you about -- counsel had
12 asked you about some of the regulations. Just so we're
13 clear, did the Nicaraguan government ever claim that
14 INAGROSA was in violation of any regulation or permit
11:31:22 15 violations?

16 A. No, sir, never. And we had constant visits
17 from INTA, from the Ministry of Agriculture and
18 Forestry. They would visit every two years, and they
19 told me that it was an excellent project, the project
11:31:47 20 being carried out, because the volumes of coffee were
21 going down and that was going to lift up the economy and
22 also serve as an incentive for producers to move into
23 that area.

24 Q. What area are you talking about?

11:32:03 25 A. I'm talking about avocado, because there was

11:32:08 1 interest on the part of many producers. They found the
2 project interesting, and so they wanted to set up a
3 similar project.

4 Q. The government wanted to set up a similar
11:32:19 5 project for Hass avocados?

6 A. Yes. On one occasion four people came from the
7 INTA to the Hacienda Santa Fé, and they asked me whether
8 it would be possible to speak with Mr. Carlos Rondón in
9 order to set up a field school for the other producers
11:32:42 10 that would make reference to the avocado project that
11 was being carried out on the Hacienda Santa Fé. The
12 idea was to convey this to the other producers to
13 encourage them to get into other lines of product, not
14 just depend on coffee.

11:33:04 15 Q. And given your experience in Nicaragua, has in
16 fact the government started to encourage the production
17 of avocados in the country?

18 MR. ZUNIGA: Excuse me, Mr. President. I
19 didn't ask any questions about the government ever
11:33:19 20 setting a school. The witness didn't say absolutely
21 anything about visits from the government or being
22 approached by representatives of the government to set
23 up a school or a project -- a government-sponsored
24 avocado project.

11:33:36 25 PRESIDENT: I don't recall either. Unless

11:33:37 1 you can point to the transcript, Mr. Mullins, you need
2 to move to another topic.

3 MR. MULLINS: Sure. I was following up on
4 the witness' testimony -- the reason I was following up
11:33:51 5 is there had been questions about permitting. I just
6 was trying to follow up on the witness' questions. But
7 let me simply ask him, because it's important to our
8 case.

9 Q. You mentioned that there's been no -- how many
11:34:06 10 visits did the government have where it had the
11 opportunity to cite INAGROSA for violations of any
12 permits?

13 MR. ZUNIGA: Excuse me, Mr. President. I
14 didn't ask anything about permitting either.

11:34:19 15 MR. MULLINS: In fact, you did ask about
16 regulations and so --

17 MR. ZUNIGA: Knowledge of regulations, not
18 permitting themselves.

19 Q. Let me just rephrase my question.
11:34:28 20 You mentioned that Nicaragua had visited
21 the farm. So how many opportunities did the Nicaraguan
22 government have to say that there were any violations of
23 any regulations?

24 MR. ZUNIGA: Excuse me, Mr. President.
11:34:39 25 This is more of the same. I asked nothing about visits

11:34:44 1 of the government or permits.

2 PRESIDENT: I don't think there were any
3 questions. I don't recall any questions relating to
4 violations of regulations or permits. Unless you can
11:34:55 5 point to a specific part in the transcript, please move
6 on to another topic.

7 MR. MULLINS: I think -- if we have a
8 break, I'll have the chance to look at the transcript.
9 I thought there was more there. I'll move on.

11:35:21 10 Q. Now, you were asked about reports from
11 Domingo Ferrufino and Raymundo Palacios at the time of
12 the invasion. Do you remember those questions? The
13 first invasion in June of 2018?

14 A. Yes, sir. Yes, sir.

11:35:48 15 Q. Just for the Tribunal's edification, can you
16 tell me what the relationship between yourself and the
17 security teams in terms of reporting?

18 A. Yes, sir, the security guards are the most
19 trustworthy persons, being security guards. Any issue
11:36:17 20 that might come up, well they would communicate it. And
21 they kept a table with notes. Well, that was damaged
22 when the invaders came.

23 Q. Right. But I was more talking about,
24 Mr. Gutiérrez, regarding the seniority in terms of
11:36:42 25 talking to you about what's going on and any security

11:36:46 1 issues. Can you explain that to the Tribunal?

2 A. Well, referring to the moments of the invasion,
3 they immediately would advise me. I would get fluid,
4 reliable and exact information.

11:37:14 5 Q. But why would they be talking to you
6 personally?

7 A. Because I am the administrative agronomist at
8 the Santa Fé farm, so they had to pass the information
9 directly on to me.

11:37:32 10 Q. Is this something they would do on a regular
11 basis?

12 A. All of the time. The security guards were
13 always passing on information when they would make a --
14 undertake patrols throughout the farm. They would make
11:37:51 15 a note of any visit, any person who would arrive at the
16 farm. They kept tabs on all of that as well as security
17 guards, who would come in, who would leave, numbers of
18 vehicles, which vehicles, number of persons.

19 Q. And in terms of -- well, let me rephrase that.
11:38:15 20 Counsel has asked you at one point, you know, sometimes
21 people lie and you said yes.

22 Do you remember that question and answer?

23 A. There are some persons, yes. But in this case
24 it was different because these were security guards.

11:38:32 25 They weren't just any person who was there.

11:38:36 1 Q. And you kind of jumped the gun on me,
2 Mr. Gutiérrez. I was going to ask you, would you put
3 Mr. Ferrufino and Mr. Palacios as somebody that you
4 thought were untrustworthy or you couldn't rely on them?

11:38:58 5 A. They are the persons who I trusted most and who
6 had the most affection for that farm because they have
7 been there ever since Don Carlos has had that farm.
8 Their people have earned those positions of trust as
9 security guards because of the way in which they've
11:39:18 10 worked on the farm over so many years.

11 Q. And going back to that day on June 17, 2018,
12 just so we're clear, can you just tell us the chronology
13 of who you spoke to, whom, and when on these security
14 issues so we're clear on the record exactly what
11:39:41 15 happened? I'm sorry, June 16.

16 A. On June 16, yes. Well, on that June 16th in
17 the morning, the group of invaders took the upper part
18 of the farm where there were two security guards. Then
19 when those persons arrived, those persons advised the
11:40:15 20 person who was in charge down below, Raymundo Palacios,
21 to contact -- Efren up above and it was Domingo down
22 below. So they always maintained that order among the
23 guards. That is to say, anything was to be reported to
24 Domingo because he was the chief of the security guards.
11:40:38 25 And then Raymundo Palacios would communicate with me.

11:40:48 1 Q. You've talked a little bit about what
2 Mr. Palacios told you. So he was relaying information
3 from Mr. Ferrufino, correct?

4 A. That is correct.

11:41:04 5 Q. And just to put us in the time frame, will you
6 just remind us what that information was?

7 A. Yes. That day Raymundo Palacios called me and
8 he said "The people got in." And I said "Where?" And
9 he said, "In the upper part. They invaded." "Who
11:41:28 10 called you?" "I was called by Domingo and Domingo was
11 called by Efren." "What did they say?" "Domingo told
12 me that they said that they had been sent by the
13 government of Nicaragua to take possession of the land."
14 That is to say, the Santa Fé farm. "Well, just a
11:41:50 15 second. I'm going to call Domingo to confirm what
16 you're telling me." So then I called Domingo.

17 Domingo sounded very nervous. He told me,
18 "Yes, engineer, the group is here and they want to speak
19 with you." And I said, "They're not going to speak at
11:42:05 20 all with me. I'm going to do something. I'm going to
21 call Raymundo to have him to go find out what it is that
22 they want."

23 Q. So did you have a chance to talk to both
24 Mr. Ferrufino and Mr. Palacios?

11:42:25 25 A. That's right. First, Raymundo called me and

11:42:29 1 advised me, and to ratify the information I called
2 Domingo, who verified the information and gave me all
3 the information.

4 Q. Since that time frame, have you been -- let me
11:42:42 5 rephrase the question.

6 The information that you had been provided
7 by Mr. Domingo and Mr. Palacios, in your own personal
8 observation, did you see any information that showed
9 that the information they were giving you was false?

11:43:07 10 I could rephrase the question. That
11 was -- let me try again.

12 In your personal observations of what
13 happened from June 2018 through August 2018, when all
14 these invasions were happening, did anything that
11:43:25 15 Mr. Palacios or Mr. Domingo tell you turn out to be
16 untrue?

17 A. No, sir. It was all positive and certain.

18 Q. You were asked about your pre-knowledge of this
19 invasion that started in June of 2018. Did you have
11:43:59 20 definitive proof that there was going to be an actual
21 invasion before it happened?

22 A. On the 15th of June, which is when they came
23 together to make the group of persons, they met outside
24 the farm, and then the next day they took possession at
11:44:23 25 the place where they invaded.

11:44:27 1 Q. And did you talk to the police before they
2 actually invaded the farm?

3 A. On the 15th, yes, all of that. I would always
4 communicate with the police. On the 15th, I called the
11:44:46 5 captain. I said, "There are a group of people who have
6 gathered outside the farm, and we understand that they
7 are going to invade." And he said, "Yes, yes, we
8 already know. We're following up on it." But it didn't
9 go beyond that.

11:44:59 10 Q. So did the police arrive at the Hacienda
11 Santa Fé to protect the property?

12 A. No, sir, at no time.

13 Q. Did the police tell you to hire a bunch of
14 security guards to protect the property?

11:45:18 15 A. No, sir.

16 Q. Did the police provide you a bunch of weapons
17 so you could protect the property on your own?

18 A. No, sir. Rather, they came to take them away
19 on the 17th of June.

11:45:34 20 Q. Tell us about how the police took away your
21 weapons to protect your own property.

22 A. Yes. On June 17th, Captain Calixto Vargas
23 came, accompanied by three other officers.

24 On that day, the 17th, I had not yet gone
11:46:02 25 to the farm. Raymundo called me. He said, "Engineer,

11:46:11 1 Inspector Calixto is here." So I said, "Mundo, what's
2 going on?" I called him Mundo. "They've come to take
3 the weapons." "What's that all about?" "I don't know,"
4 he said. "There are orders from Commissioner Marvin
11:46:25 5 Castro and William Herrera." "Let me speak with him," I
6 said. So he let me speak with him and I said, "Hello,
7 how are you, Calixto?" And he then said, "engineer,
8 I've come to take the weapons." "Why", I said? "On
9 orders of Commissioner Marvin Castro and William
11:46:50 10 Herrera." "And why?" "Well, the thing is we have
11 learned that they're going to burn this farm, and
12 they're going to take it over as well. They're going to
13 take the lower part as well." And I said, "Well, but
14 you're going to leave me with a document saying you've
11:47:08 15 got the weapons?" "No, they simply gave me orders to
16 take them away." "Well, then I can't turn them over to
17 you because how am I going to answer to Mr. Carlos?"
18 And he said, "Well, hold on a second, I'm going to call
19 Captain William and see where all that stands."
11:47:25 20 And then I called Captain William. I
21 called him, I greeted him, and I said, "Captain, what's
22 this all about that you've sent them to take away the
23 weapons from the Santa Fé farm?" And he said, "Yes,
24 that's on orders of Commissioner Marvin Castro." And I
11:47:43 25 said, "But you have to give me a document showing that

11:47:46 1 you've got the weapons, they're taking them." And he
2 said, "No, this is an order. What do you want? You
3 want me to take you as well? Order that you be brought
4 in as well?"

11:47:55 5 And so I became angry and he said -- I
6 said, "We're not going to work this out here. I'm going
7 to call Carlos Rondón or give you his number."

8 So he called Don Carlos. I don't know
9 exactly what their conversation was, and then Don Carlos
11:48:15 10 called me. He was angry. I couldn't figure out what to
11 do at that time, so I called Raymundo at the farm once
12 again, "Let me speak with the captain." And so
13 inspector Calixto said, "Engineer, let's do something.

14 So that I don't get involved in any problems, give me a
11:48:34 15 written communication -- or give us just some." So
16 there were three shotguns that we gave them. So we gave
17 them those. I said, "How are you going to leave me
18 without any, given that all these people are here?"

19 Q. Thank you. Before I hear from the Tribunal, we
11:48:52 20 have to keep our answers somewhat short, but I
21 appreciate the detail.

22 Just so we're clear, Mr. Gutiérrez, at any
23 time during this period did the police ever tell you
24 that INAGROSA needed to hire more security guards or get
11:49:18 25 more weapons?

11:49:22 1 A. No, sir. Rather, they told us best not to go
2 to the farm. In other words, that we should simply
3 abandon it.

4 Q. Now, let's finish this chronology about --
11:49:42 5 sorry.

6 Mr. Gutiérrez, so given that the police
7 were not telling you to protect the property yourself,
8 what was the expectation that you and INAGROSA had as to
9 what was going to do -- who was going to protect the
11:50:13 10 property?

11 A. Well, that is why -- well, we were carrying out
12 an avocado project, and they had invaded the lower part,
13 and that's why I ignored what they told us, which is
14 that we should abandon the lower part. Because up until
11:50:34 15 that time, their intention was just to take the upper
16 part. So I spoke with Don Carlos, and he told me,
17 "Luis, we've got to continue with the project. Let's
18 see what happens. Let me see what -- let me see."

19 So we continued with working on the
11:50:52 20 project until the second invasion on 16 July 2018.

21 Q. Thank you. I think actually that's the
22 question I was about to ask you, which is the chronology
23 of the invasions, the continuous invasion, but let me go
24 back because I don't think you understood my question.

11:51:12 25 Just during this whole time period of

11:51:19 1 these escalating invasions where the police were not
2 telling you to arm yourself, in fact taking weapons
3 away, what was the expectation that you had as to who
4 was going to protect Hacienda Santa Fé from these
11:51:30 5 invaders?

6 A. Well, we were in the lower part, but my
7 expectation was that it was true. This led me to
8 understand that the police were supporting the invaders
9 because he came to take the weapons from us, so why not
11:51:55 10 go to where the invaders are?

11 Q. So there was talk about, again, this hearsay,
12 but did you have the opportunity to actually talk to the
13 invaders themselves during these escalating invasions?

14 A. Yes. On 18 June, the first invasion, I went to
11:52:26 15 the upper part in one of the four-wheel drive vehicles
16 that we had. I was accompanied by Raymundo. So I said,
17 "Come with me, let's see what these people want," and
18 let's see more or less how many there are and who they
19 were.

11:52:45 20 So I went to the upper part and there I
21 met with Benicio Garcia. They called him Gorgojo. And
22 Cristobal Luque and there were any other number of
23 persons there in the infrastructure of the upper part.
24 And I introduced myself as the engineer who was the
11:53:05 25 administrator of the farm, and they told me, "Well, yes,

11:53:09 1 we are here," they said, "because the government of
2 Nicaragua is giving us this farm and we're going to take
3 possession of it."

4 So I said, "Okay", well -- and so I went
11:53:27 5 with Raymundo. That was the first time I met with them
6 there.

7 Q. So this is something you heard directly,
8 correct?

9 A. That's right, the first time.

11:53:46 10 Q. And during this time period, was there, in your
11 mind, any reason the police could not have come to the
12 protection of Hacienda Santa Fé if it wanted to?

13 A. No, I don't think there was any motive that
14 would stand in the way of that.

11:54:15 15 Q. What about physically, roadblocks? I mean
16 why -- there has been questions about roadblocks, and
17 you mentioned one in your statement. Why would that not
18 have prevented the police from protecting Hacienda
19 Santa Fé?

11:54:33 20 MR. ZUNIGA: Excuse me, Mr. President.
21 This was no subject of the cross-examination of
22 Mr. Gutiérrez.

23 MR. MULLINS: You specifically asked
24 questions about roadblocks and you asked a definition of
11:54:42 25 that in your questioning of the witness. I can give you

11:54:46 1 that cite if you need.

2 MR. ZUNIGA: When referring to the alleged
3 meeting between the witness and engineer Fabio Dario
4 Enriquez.

11:54:55 5 MR. MULLINS: Right. And there was always
6 questions regarding the expectations as to what Hacienda
7 Santa Fé was doing to protect itself, and I think the
8 witness should be allowed to answer as to whether or not
9 the police had the ability to protect the property,

11:55:09 10 given your questions about roadblocks and your questions
11 about the protection of the Hacienda, that the INAGROSA
12 was supposed to do on its own.

13 PRESIDENT: Please go ahead and ask your
14 question, but keep it only on the narrow ground because
11:55:23 15 the questions by counsel for the Respondent about the
16 roadblocks was really limited to the meeting.

17 MR. MULLINS: Understood.

18 Q. Just so we're clear, were there roadblocks in
19 the area?

11:55:47 20 A. No, sir. In the municipality of San Rafael
21 del Norte, there were not.

22 Q. Just so we're clear, were there roadblocks that
23 prevented all the police from going to the Hacienda
24 Santa Fé?

11:56:04 25 A. No, sir. Had there been roadblocks, that would

11:56:09 1 have kept me from traveling from Jinotega, from my
2 house.

3 Q. Now, you also talked about -- that you also had
4 other conversations with the invaders. Did any of them
11:56:27 5 make any death threats to you personally?

6 A. Personally, no. After 16 July, when I met with
7 them on the occasion of the second invasion, they had
8 not evicted us. The threats came from when they were
9 evicted for a week and then came back.

11:57:00 10 Q. And what were those threats?

11 A. Well, on August 14th of 2018, when they had
12 supposedly been evicted, we went to take inventory of
13 the damage with Captain William Herrera and Attorney
14 Monzón.

11:57:25 15 That day, Jaime Vivas, when we were taking
16 inventory, found a note on a sheet of paper that said
17 "we're going to come back, and we're going to cut off
18 your head for being a snitch -- you, the administrator
19 and the owner."

11:57:44 20 Q. And this was -- now, this is August 14, 2018,
21 and --

22 A. That's right.

23 Q. This is at the same time you're doing this
24 inventory, correct?

11:58:05 25 A. That is correct.

11:58:10 1 Q. This other wave of invasions happens how soon
2 after this letter that you find -- that Mr. Vivas had
3 found?

4 A. That was the 14th, the letter, and the 17th of
11:58:31 5 that same month they came back in the afternoon.

6 Q. So, really, nearly within mere days of this
7 inventory there's yet another continuation of this
8 invasion, correct?

9 A. Exactly. That's when they invaded the farm
11:58:56 10 once again up till 2021 they were there.

11 Q. And you talk about death threats. Can you tell
12 us about any threats you may have gotten from -- you
13 mentioned in your statement from Mr. Ortega Kuan known
14 as El Chino and Haniel Rizo. Can you talk to us about
11:59:23 15 that?

16 MR. ZUNIGA: Mr. President, I didn't ask
17 any questions about death threats by El Chino or anyone
18 else.

19 PRESIDENT: Again, the same comment. I
11:59:33 20 don't recall that either. Unless you can point to a
21 particular passage in the transcript, let's move on to
22 another topic.

23 MR. MULLINS: Mr. President, I appreciate
24 that. One -- Nicaragua has asked questions about what
11:59:52 25 INAGROSA did to protect itself and I do think it is fair

12:00:02 1 to ask the witness why it is that he personally left the
2 Hacienda Santa Fé in August 2018. Can I just simply ask
3 him that?

4 PRESIDENT: Yes. Please go ahead with
12:00:09 5 that.

6 MR. MULLINS: I appreciate the
7 accommodation, Mr. President.

8 Q. Can you tell us in your own words,
9 Mr. Gutiérrez, why it is at this time when you have this
12:00:21 10 next wave of these invasions that you personally left
11 the Hacienda Santa Fé?

12 A. Well, because they came back and invaded. They
13 realized that I was being provided information, and
14 after they came back, after they invaded again, this guy
12:01:00 15 Toño Loco came back, right? He was a paramilitary and
16 he told Jaime, "Well, I'm going to riddle the little
17 agronomist's chest with bullets from Santa Fé," and then
18 he was killed in December 2018. The paramilitaries
19 killed him.

12:01:33 20 But then we had this Chino Kuan and then
21 also Toño Loco's son. And four times or even more, when
22 they found me, they threatened me. I recall that, in
23 2019 -- by June 2019, the government celebrates the 19th
24 of July, and I found him in Jinotega and he said, "Oh,
12:02:13 25 Luisito, Luisito, we have so many problems and we

12:02:18 1 want -- we wouldn't want to involve you in our problems.
2 We realize that you are being fed information from the
3 farm. Well, you know that there's no more rabies if the
4 dog is killed." So you know that I was being
12:02:35 5 threatened, right?

6 THE INTERPRETER: Mr. Hill, this is the
7 interpreter. If you shuffle papers in front of an open
8 mic, I cannot hear the witness clearly.

9 MR. MULLINS: Apparently it's so bad that
12:03:20 10 you confused me with my colleague, Mr. Hill. I am
11 Mr Mullins.

12 Q. Mr. Gutiérrez, you were asked questions about
13 the laptop and a desktop. Actually, if we can pull up
14 C-58, and I think the Spanish is R-148. Maybe we could
12:03:35 15 put those up. 148. R-148.

16 You were asked a number of questions
17 regarding this inventory. Do you remember those
18 questions?

19 A. I do, yes, sir.

12:04:26 20 Q. And specifically, if you go to the Bates
21 No. 1036, which is the last page, you see there it
22 mentions that there was a desktop computer.

23 Just so we're clear, can you tell us again
24 what these other items are? What this was intended to
12:05:18 25 reflect?

12:05:28 1 A. The other items, well, I was making reference
2 to a Rhino. A Rhino is a small cart, and I say that
3 those were items that we had before they were stolen on
4 that day when we went there and we took inventory of
12:05:54 5 things.

6 Q. And that included the desktop computer that's
7 listed there, correct?

8 A. That's right, sir.

9 Q. And you mentioned there were laptop computers.
12:06:08 10 Sitting here today, do you remember exactly where the
11 financial information that was retained for INAGROSA,
12 where that was kept?

13 A. On that laptop which was in my office, on my
14 desk.

12:06:35 15 Q. When you say laptop in your office on your
16 desk, I think there's been some confusion, maybe you can
17 help us, between what one considers a laptop computer
18 and a desktop computer.

19 Just so we're clear, the computer that was
12:06:52 20 on your desk, was it missing at the time you did this
21 inventory?

22 A. Yes. It was no longer there. All of the
23 administrative documents and office materials, all of
24 those things were no longer there, and it was inspected
12:07:20 25 in my presence by Mr. Herrera and the lawyer,

12:07:23 1 Mr. Monzón.

2 Q. And it was pointed out to us that this was
3 signed by both yourself and Captain Herrera, correct?

4 A. That's right, sir.

12:07:43 5 Q. And was this document intended to be a
6 100 percent -- let me rephrase the question.

7 Just tell us what area of the plantation
8 that this was supposed to inventory.

9 A. The plantation there -- well, of the area of
12:08:19 10 the Casa Hacienda, 1.5 kilometers away, we weren't able
11 to go there because the lawyer said that he didn't want
12 to be there for a long time. He didn't feel safe. And
13 that is why we were able to conduct the inventory only
14 in the Casa Hacienda section.

12:08:40 15 Q. When counsel went through this document with
16 you, he didn't talk about paragraph 3, damage to
17 plantations. Let's go to that section?

18 MS. GREENWOOD: Counsel, before you move
19 on to that, if I may.

12:08:57 20 MR. MULLINS: Sure.

21 MS. GREENWOOD: Just, Mr. Gutiérrez, so
22 that the Tribunal understands your evidence today, in
23 reference to the category that states "Other Items" --
24 and I don't know if you could be directed to that in the
12:09:14 25 Spanish on the screen -- it lists a Rhino cart and then

12:09:20 1 it goes on. And you have helpfully explained what the
2 Rhino cart is.

3 Is it your testimony today that those
4 items listed after a Rhino cart were all taken by the
12:09:40 5 invaders?

6 MR. GUTIÉRREZ: That is right, madam.
7 They were stolen. They took them also.

8 MS. GREENWOOD: Thank you.

9 Q. Going back to paragraph No.3 or section 3, it
12:10:06 10 says "Damage to Plantations," you were not asked about
11 this section. Just so the record -- it talks about,
12 "damage to a total of 7,000 plants of land Hass and Hass
13 grafted avocado."

14 What is that referring to?

12:10:31 15 A. They make reference to the nursery that was
16 there very close to the Hacienda Santa Fé. That was
17 inspected at the time. That nursery is behind the
18 kitchen of Hacienda Santa Fé, and it was visible that
19 they had destroyed the whole thing.

12:10:49 20 Q. It talks about damage to the fruit, 130,000
21 pieces. What's that refer to?

22 A. Yes, certainly it makes reference to the
23 harvest that was expected for 2018. Domingo Ferrufino
24 verified that damage. In order to get to the Hacienda
12:11:17 25 and get to his house, he has to go through the whole

12:11:21 1 avocado plantation.

2 Q. And then -- and did the police dispute any of
3 those references to the damage to the plantation?

4 A. I didn't understand your question.

12:11:39 5 Q. Sure. Did Captain Herrera dispute any of these
6 listing of damage to the plantation?

7 A. No.

8 Q. It talks about "damage to settled trees planted
9 in 40 hectares totaling 16,000 plants with broken
10 branches." What does that refer to.

11 A. It makes reference to the damage that they had
12 done in the avocado orchard. This was verified by the
13 security guard, Mr. Domingo Ferrufino.

14 Q. Did you see -- it also talks about "damage to
12:12:31 15 protected green areas and extraction of selected walnut,
16 guayabo and ocotillo timber." What does that refer to?

17 A. Yes. It makes reference to the fact that in
18 order for you to enter the Hacienda and you're in the
19 land of the Hacienda and you're on your vehicle, from
12:12:54 20 the very beginning until you get to the Hacienda, you
21 have to go for about 1.5 kilometers, and you could see
22 on the road the damage that was done to a section of the
23 forest known as El Caimito.

24 Q. What kind of damage was done?

12:13:19 25 A. Yes, you could see that they had cleared the

12:13:23 1 forest. From the very beginning these people started to
2 clear the land to extract the wood to construct their
3 homes.

4 Q. It talks about "damage to the environment,
12:13:37 5 flora and fauna." What is that about?

6 A. Yes, sir, that's true. Where we're talking
7 about flora, that is to say all the vegetation and
8 fauna, that means everything that has to do about
9 animals. There was damage to the forest and this, in
12:13:59 10 turn, damages animals because when you have land
11 clearing, the birds have no place to find refuge or to
12 set their nests. That's what I'm talking about when I
13 talk about damage to the environment flora and fauna.

14 MR. MULLINS: Mr. President. I have some
12:14:20 15 more questions but I think we're on schedule for lunch.
16 I don't know if you want us to continue. I don't know
17 if I'll be able to finish in the next 15 minutes or so.
18 I think I've got more.

19 PRESIDENT: You need more than 15 minutes?

12:14:31 20 MR. MULLINS: Yeah, I think I do, sir.

21 PRESIDENT: Let's then break for lunch
22 now, if you think that this is a convenient time.
23 Otherwise, we can go on until 12:30.

24 MR. MULLINS: I really don't think I'll be
12:14:56 25 able to finish in 15 minutes.

12:14:58 1 PRESIDENT: No, that's not what I'm
2 saying. You can use another 15 minutes and we can go to
3 lunch at 12:30.

4 MR. MULLINS: I think actually now is a
12:15:08 5 good time to break.

6 PRESIDENT: Let's break now for lunch
7 until quarter past 1.

8 But before we leave, just to see where we
9 are, we have Mr. Welty in the afternoon, and as we
12:15:24 10 discussed yesterday, if we complete with Mr. Welty well
11 before 6:00, we could start with Ms. Gutiérrez. And I
12 understand she's available.

13 MS. GONZÁLEZ: Yes, she is.

14 PRESIDENT: Let's keep that in mind, and
12:15:43 15 we break for lunch now.

16 Mr. Gutiérrez, the same reminder. Please
17 don't speak with anybody about your testimony during the
18 lunch break.

19 MR. GUTIÉRREZ: I understood,
12:15:55 20 Mr. President. Thank you.

21 *(Lunch Recess)*

22 PRESIDENT: Okay. Let's resume. The
23 Tribunal has discussed during the break, and we wanted
24 to remind the parties, also applies to the Respondent
01:18:01 25 although you will start redirect, or examination of your

01:18:05 1 witnesses only perhaps as of today -- but really, the
2 purpose -- to remind the parties of the purpose of
3 redirect examination. It's not a substitute for direct
4 examination and shouldn't be used to rehash evidence
01:18:21 5 that is already on the record. The purpose is to
6 clarify evidence that has come out on cross-examination
7 and make sure that there is clarity on that evidence.
8 What was not really helpful or useful use
9 of the Tribunal's time is to go through the evidence
01:18:45 10 that is already on the record in the witness statements.
11 This is simply for purposes of providing guidance and
12 make sure that we are conducting an efficient hearing
13 that is helpful for the Tribunal.
14 MR. MULLINS: Thank you for that guidance,
01:19:06 15 Mr. President. Some of the times we do this because we
16 want to make sure things are put in context and so the
17 whole thing can be understood. But we appreciate the
18 guidance and if there's any time you feel that we need
19 to move on, you have been not been shy in telling me to
01:19:23 20 do so and I think we are all appreciative of the
21 guidance. We're here to help you and not just make
22 ourselves heard.
23 PRESIDENT: What I just said applies
24 across the board. So it's a guidance that applies to
01:19:35 25 every single question. So please keep that in mind when

01:19:39 1 you proceed.

2 MR. MULLINS: Thank you.

3 PRESIDENT: On that basis, we will go on.

4 Proceed, please.

01:19:58 5 BY MR. MULLINS:

6 Q. Thank you. We're back, Mr. Gutiérrez. If we
7 could pull up some testimony from yesterday's cross, and
8 there was a reference to the direct examination.

9 You see there you were asked -- if you
01:20:36 10 look in the right corner, it's the question from

11 lines --

12 MS. GREENWOOD: Sorry, Mr. Mullins, can
13 you give the reference, just for the transcript?

14 MR. MULLINS: Sure. So we're on day 3,
01:20:48 15 starting at line 5. I want to make sure it matches. I
16 think it's line 4 in the Spanish. In English, this is
17 from yesterday's beginning their cross -- at the cross.
18 Counsel for Nicaragua, Mr. Zuniga, said:

19 "Earlier today, when Claimant's counsel
01:21:19 20 asked you some questions, you mentioned that in
21 August 2021, all of the invaders had left. Do you
22 recall that?"

23 Answer: August?

24 Question: Yes, August 2021. What was
01:21:30 25 your answer?"

01:21:31 1 Then it goes on:

2 "Mr. Gutiérrez, for the clarity of the
3 record, you stated when Claimant's attorney was asking
4 you questions that, in August 2021, the invaders had
01:21:39 5 left?"

6 Answer: "That's correct."

7 Q. Do you see that in the Spanish language? Let
8 me make sure he reads the whole thing.

9 MR. ZUNIGA: Excuse me. Could you give us
01:21:50 10 a page reference, please? What page is this?

11 MR. MULLINS: I'm sorry, It is page 738.
12 And the Spanish is 898.

13 Q. Do you see that, Mr. Gutiérrez?

14 A. Yes, sir.

01:22:17 15 Q. So if you actually go back to what I asked you
16 in the direct, it was the following, and -- there it is.
17 What page is that? Yeah, 691, lines 12 through 17, the
18 question actually was:

19 "And, finally, Mr. Gutiérrez, as the
01:22:54 20 administrator of Hacienda Santa Fé INAGROSA in August of
21 2018, did Nicaragua ever issue a handover certificate or
22 any formal document that formally turned the property
23 over to INAGROSA in August 2018?"

24 You answered: "No, sir."

01:23:13 25 Do you see that?

01:23:13 1 A. That's right.

2 Q. So what you actually were asked had nothing to
3 do with invaders leaving during direct. You were only
4 asked about the handover certificate. My question to
01:23:25 5 you is are you still verifying your testimony from your
6 direct that there was no handover certificate in
7 August 2018?

8 A. That's right.

9 Q. And if we could go to R-108, and I think it's
01:24:06 10 C-86, which is I believe the Jiménez report.

11 So, first, I think your testimony was you
12 don't know exactly when this report was done, correct?

13 A. Yes, sir.

14 Q. But if you look at page 5, it says that we --
01:25:07 15 it goes:

16 "It's also interesting because some of the
17 rootstocks of the previous nursery are in very good
18 condition. Therefore, we need to arrange them and guard
19 them to plant them again in May 2016."

01:25:18 20 Do you see that?

21 A. That's right, sir.

22 Q. So you agree with me that, whenever this was
23 done, we know it was before May 2016, correct?

24 PRESIDENT: These are very leading
01:25:31 25 questions, Mr. Mullins.

01:25:36 1 MR. MULLINS: I'm sorry.

2 Q. Does the reference to May 2016 give you any
3 guidance as to when this was done?

4 A. Yes, sir, before 2016.

01:25:47 5 Q. Thank you. You just don't know when. Is that
6 accurate?

7 A. That's right.

8 Q. Can we go to page 3?

9 Some of the things that counsel showed
01:26:14 10 you, he skipped over some of the other references in
11 this, and I just wanted to go through it so you can
12 explain to the Tribunal what Mr. Jiménez was talking
13 about.

14 For example, he says "the rootstocks are
01:26:25 15 in very good condition." What is he referring to there?

16 A. He was making reference to the rootstock that
17 were in place in 2016. The plantation, the cultivation
18 in 2016.

19 Q. And he says, "the decision to move the
01:26:53 20 rootstocks that were in the nursery to the field, at the
21 time of the pruning, was excellent, since they were in
22 very good condition." What does that refer to?

23 A. That that was going to facilitate and make more
24 expeditious the planting of the plant in the field and
01:27:20 25 the grafting so that the plant could have a better

01:27:24 1 development.

2 Q. He goes on and says, "of course, it's a very
3 large group to graft. I would prioritize grafting
4 rootstocks in the field rather than grafting ..."

01:27:35 5 THE INTERPRETER: Sir, this is the
6 interpreter. You're reading extremely quickly. I don't
7 know where you're reading. If you could please point me
8 to where you're reading?

9 MR. MULLINS: I'm reading below the first
01:27:46 10 picture, first full paragraph. I'll slow down.

11 Q. He goes on to say, "of course, it is a very
12 large group to graft. I would prioritize grafting
13 rootstocks in the field rather than grafting [in the]
14 nursery if the availability of grafts is not enough."

01:28:02 15 What is that referring to?

16 A. It was making reference to the sending of the
17 plants to be grafted, so to go ahead with the rootstock,
18 well, it was a good idea to first plant the rootstock
19 and then to go into the field and graft it.

01:28:35 20 Q. And if you go down to the paragraph that starts
21 "In general," he says, "In general, during the entire
22 visit, it may be seen that the new growth is doing very
23 well, there are very few trees of unsuitable red color,
24 and the two water-diluted fertilizations performed
01:28:51 25 during the past two months have been producing great

01:28:54 1 results."

2 First, what does it mean by "unsuitable
3 red color"?

4 A. Well, it wasn't the red color that we wanted to
01:29:09 5 see on the plant, so he suggested that we should
6 fertilize more often. We should feed the plant more
7 often and give the plant potassium, zinc, magnesium and
8 nitrogen. These are the nutrients that help the plant
9 develop before.

01:29:33 10 Q. When he says "there are very few trees of
11 unsuitable color", what does that refer to? "Very few
12 trees of unsuitable red color."

13 A. Very few. That means that the nutrition we
14 were giving to them was appropriate. We were giving
01:29:58 15 them the nutrients that I mentioned.

16 Q. And what does it mean by the "two water-diluted
17 fertilizations performed during the past two months have
18 been producing great results?" What are the two
19 water-diluted fertilizations he's referring to?

01:30:19 20 A. Yes. It's making reference to this
21 fertilization. It's like, you know, when you give
22 someone a drip, right, a serum when they're not doing
23 well. So we did a mixture of phosphorus, nitrogen and
24 potassium. So we went and fed this to the root of the
01:30:43 25 tree. That's where the plants get their food using the

01:30:47 1 root system. And I told him that we're doing that
2 application, and he said, "Excellent, Luis. Do this.
3 You can see the development you are obtaining."

4 MR. MULLINS: Scroll down to the next
01:31:00 5 page. That's fine. Can you scroll up so we can see the
6 entire page?

7 Q. On the paragraph that says --

8 MR. MULLINS: Can you make it a little bit
9 bigger. Sorry, my eyes are getting ...

01:31:32 10 Q. I'm looking at the paragraph, the third
11 paragraph. It says, "It should be remembered that high
12 densities in Peru and Chile occur in parcels in deserts
13 with water management and, mostly, considerable pruning
14 work."

01:31:45 15 What is the reference there to Peru and
16 Chile, and how does that compare to what's going on at
17 Hacienda Santa Fé?

18 MR. ZUNIGA: Excuse me, Mr. President, I
19 didn't ask any questions about the avocado plantations
01:31:57 20 in either Peru or Chile.

21 MR. MULLINS: He did ask -- well, the
22 testimony came out about deserts, and he asked about
23 this document. I'm allowed to ask questions about this
24 document. He asked numerous questions about this
01:32:10 25 document.

01:32:10 1 PRESIDENT: Now I need to go back to what
2 we just discussed in the beginning of this session.

3 The purpose of redirect examination is to
4 clarify issues that came up during the cross-examination
01:32:26 5 and, in your view, remain unclear.

6 The fact that there were questions on this
7 document is not really here or there. The question is
8 whether there is any point that came up during the
9 cross-examination that remained unclear.

01:32:50 10 That should be all the guidance for the
11 redirect examination. So if you want to assist the
12 Tribunal, that's the way to proceed. But, true, there
13 was a series of questions on this document, so please go
14 ahead, but keep in mind the Tribunal's guidance.

01:33:05 15 MR. MULLINS: And I appreciate that. He
16 specifically asked about this sentence in the
17 cross-examination. That's why I went back to it. So if
18 I could go back, he was specifically asked about this
19 sentence, and I just wanted clarification for the
01:33:19 20 record, how does the Peru and Chil  compare to Hacienda
21 Santa F  in his experience as an agronomist.

22 A. The comparison has to do with the soil. There
23 is a great difference because in Nicaragua we do not
24 have a desert, and more so in the area where we have the
01:33:48 25 parcel. There, there was a reference to Peru and Chil ,

01:33:54 1 meaning that they have the crop in the desert where they
2 need to store water to be able to water the plantation.

3 So they -- for example, when they are --
4 they control the humidity in the soil by means of the
01:34:17 5 number of plants per hectare, and the type of soil is
6 sandy.

7 Q. There was also a question about -- there may be
8 issues with water and flat lands. Was the Hacienda
9 Santa Fé -- well, describe for us the topography of the
01:34:34 10 Hacienda Santa Fé, if you could?

11 A. The topography of the 1.867 blocks that are the
12 equivalent of 1,320 hectares has -- indicates that we
13 have no flat lands. We have great slopes. We never had
14 a problem with water accumulation. But Peru, Chile are
01:35:11 15 flat lands that are desert areas and that's the reason
16 why I am mentioning that we never had a problem with the
17 phytophthora, the fungus I mentioned before. The damage
18 with the phytophthora is in the root system of this crop
19 and the reason is that there is a great accumulation of
01:35:35 20 water, but we did not have that because of our
21 topography in FINCA Santa Fé.

22 MR. MULLINS: Can we go now to -- I
23 believe it's C-434, which is the memo from Edwin
24 Gutiérrez. Can we go to the conclusion section?

01:36:27 25 Q. If you see the conclusions there, just briefly

01:36:29 1 for the Tribunal, did you agree with the conclusions of
2 Mr. Gutiérrez as to the nature of the crops of Hass at
3 Santa Fé at this time period?

4 A. In connection with the conclusions that I see
01:36:52 5 in this document, I do not agree. We never agreed.

6 Q. Specifically, what issues did you have with his
7 report?

8 A. Can we go to the beginning of this document?

9 Q. Sure.

01:37:20 10 A. In this document at the beginning where we see
11 first report based on statistics, first report of
12 statistical base of growth and development of Hass
13 avocado in the first 2.5 years. So these plants were
14 more than 2.5 years old, according to the report. So if
01:37:49 15 we can -- here, if we look at La Frijolera, that parcel,
16 there we have samples of the month of September --

17 MR. ZUNIGA: Excuse me, Mr. President. I
18 didn't ask any questions about the charts in this
19 document. I specifically went to the conclusions and
01:38:07 20 also the reference made to the manager of the field
21 complaining about not having enough training and asking
22 for more.

23 MR. MULLINS: Then I'll go back to my
24 original question. The witness brought me there. I was
01:38:17 25 going to ask him about the conclusions. I'm happy to go

01:38:20 1 right there. That's exactly where I was headed if you
2 remember when I asked the question, so I'm happy to go
3 to the conclusions.

4 Can we go to the conclusion section,
01:38:30 5 please. Again, if I could ask the witness --

6 Q. Mr. Gutiérrez, the Tribunal really wants us to
7 focus on things that were brought up in your
8 cross-examination by Nicaragua's counsel. So if you
9 could just listen to my question so I can -- we can get
01:38:49 10 through this, but I want to make sure that we are
11 responsive to the Tribunal's needs. Okay?

12 A. Yes, but in order to explain the conclusions, I
13 also need to look at the beginning and how that report
14 is drafted because, based on the report at the
01:39:14 15 beginning, the conclusions come up at the end.

16 Q. Understood. But just, as counsel mentioned,
17 you talked about the training -- he asked you about the
18 training. Do you agree with Mr. Gutiérrez that there
19 was inefficient and poor training at the Hacienda
01:39:32 20 Santa Fé facility during this time period?

21 A. No, sir, because the person in charge of the
22 avocado project was myself.

23 Q. And in your experience, as chief agronomist,
24 can you tell us why you think that the training was
01:39:52 25 sufficient?

01:40:02 1 A. Because training -- training for the person in
2 charge of the field, that is Marlon Gutiérrez,
3 Mr. William. It's not referring to myself. And out of
4 lack of knowledge of Mr. Gutiérrez, he didn't know
01:40:18 5 exactly what the specific position of Marlon Gutiérrez
6 was -- Edwin Gutiérrez. Gutiérrez was responsible for
7 supervising the workers. He did not have to offer any
8 specifications on the avocado crop.

9 Q. On paragraph 3 it talks about the lack of water
01:40:47 10 and fungus. Do you believe that was a problem at
11 Hacienda Santa Fé?

12 A. No, sir. As I explained already to the
13 previous lawyer that asked me, because of my
14 agricultural experience, and I don't know what happened
01:41:13 15 with Odilo Duarte, who's supposedly an expert, I don't
16 know whether he endorsed that phytophthora is because of
17 the lack of water. If he said that, he is wrong.

18 Let me reiterate that the phytophthora
19 damage is a result of water accumulation over several
01:41:32 20 days, and Mr. William, since he has no knowledge -- I
21 understand him -- he says it is due to the lack of water
22 that we had -- that we experienced during the early
23 months, and that's the reason why he assumes that it
24 was -- the plants dried out because of phytophthora
01:41:54 25 cinnamomi, and if someone tells me that without any

01:42:01 1 knowledge in agriculture, I say why is he going to say
2 that the phytophthora damage is due to water
3 accumulation?

4 Again, phytophthora lives in the ground,
01:42:15 5 in the soil, and it can go on for several months or a
6 long time as long as there is water. But if there is no
7 water, it cannot spread. So it's usually done through
8 the run-off and the humidity in the soil that allows for
9 this fungus to spread.

01:42:41 10 Q. In paragraph 4, the questions you were asked,
11 do you agree with him about the avocado weight and the
12 development is very slow, what it says there in
13 paragraph 4?

14 A. No, sir.

01:42:59 15 Q. And why not, sir?

16 A. Because, once again, he is referring to a
17 sampling that he allegedly carried out with the
18 plantation that was 2.5 years old and more. So
19 supposedly the plantation -- the plants that were
01:43:23 20 sampled were older -- were 2.5 years old or older.

21 There he's also referring to the
22 La Frijolera lot. La Frijolera lot was first sown in
23 2016, so this report was written in the same year, so
24 how can he be referring to plants that are 2.5 years old
01:43:49 25 when those lots were just established in 2016?

01:43:54 1 Q. Does the avocados -- does a tree have the same
2 yield as it matures over time?

3 A. Clearly, yes, sir. Any type of crops such as
4 mangos, oranges, pears, the first harvest gives you a
01:44:26 5 reduced number, but excellent results are seen in the
6 second year of production usually, or starting with the
7 second year of production.

8 Q. So when does it start stabilizing -- you said
9 the second year you do better. But when does it start
01:44:40 10 stabilizing?

11 A. Let me explain. The first production is after
12 2.5 to three years. That is the very first yield. And
13 the performance is not the very best. But the excellent
14 results starts in the second year of production.

01:45:04 15 Q. And then do you expect that after the second
16 harvest of that tree, then the yield will essentially be
17 the same, or does it alter?

18 A. No, sir. That changes because the tree
19 develops, new branches come up. There is better growth
01:45:30 20 and better development as years go by.

21 So the plant starts to offer better
22 results, and it is not that as the plant grows and
23 develops everything will be the same. It also depends
24 on the type of food that you give to the plant, and
01:45:52 25 that's why you reanalyze the soil to determine

01:45:56 1 deficiencies. For example, if nitrogen is needed in the
2 soil, we need to carry out a physical chemical analysis.
3 We also need to visually inspect the soil so -- or the
4 food that is needed is something that we give to the
01:46:14 5 plant.

6 Q. Just so we're clear, then, then even after the
7 second harvest, you'll see a greater yield from the same
8 tree as long as it's being properly nourished and the
9 conditions are appropriate?

01:46:32 10 A. That's correct, sir.

11 Q. So related to that, if you look behind you, you
12 were given some math today on that white board. Do you
13 remember that testimony? Right behind you there.

14 A. Yes, clearly.

01:46:54 15 Q. And you never -- that's the first time that
16 anyone had -- that counsel had shown you that kind of
17 math, right? On these calculations?

18 A. It's the first time that it is explained in
19 this manner. Yes, there are some mistakes, I
01:47:17 20 understand, because he never visited the crop, the
21 avocado grove. But if you allow me, I can explain to
22 you how it works.

23 Q. Can you explain to us the mistakes you think
24 that were made?

01:47:38 25 A. Could you please put that on the screen?

01:47:45 1 Q. The chart?

2 A. Okay, I will do it without looking at it, I
3 guess, because I know --

4 Q. Are you asking about the chart from your
01:47:57 5 witness statement, or are you talking about the chart
6 behind you?

7 A. It's okay. It's okay. I know -- I drafted my
8 document so I know -- I am going to explain.

9 Q. Just a second. I think I know what you're
01:48:14 10 talking about. Just give me a moment.

11 If you go to your witness statement,
12 paragraph 215, Chart A, in your second witness
13 statement. Is that the chart -- let's get the Spanish
14 first. Scroll up so he can see it. Is that the chart
01:49:06 15 you're referring to, Mr. Gutiérrez?

16 A. That is correct.

17 Q. So going back, then you were going to explain
18 what the issues were in the counsel's calculations?

19 A. Yes, sir. First, the year has 12 months, so
01:49:29 20 there are 12 months in a year. There are 12 months in a
21 year, 48 weeks. In this table it refers to the year
22 when the lot was developed, lot 8 of 14.87 hectares.
23 But only 10 in that year were produced, 10 hectares.
24 Why only 10 hectares? That is based on the yield of the
01:50:05 25 harvest in 2017. Because in early 2014, 10 hectares

01:50:13 1 were established, and towards the end of 2014, between
2 November and December, lot 8 of 14.87 hectares was
3 completed.

4 If you look at February/March there is a
01:50:33 5 difference of five, six or seven months, rather, and
6 that's the reason why 4.87 hectares in that year were
7 not prepared for the harvest. And this chart or table
8 does not refer to the month, the number of hectares in
9 the lot that were developed. It only says analyzed, and
01:50:58 10 that's why it says 2014, 2015, but it does not say that
11 it was in the first week when everything was
12 established.

13 So I understand what he's saying, but
14 that's the reason why, in 2017, only 10 hectares were
01:51:17 15 harvested.

16 The fact that the 14 hectares were
17 established in 2014, it doesn't mean that all of them
18 were ready to produce and only 10 produced something.
19 The rest was ready for production in 2018. And that's
01:51:35 20 when El Mango lot was going to be added.

21 MR. MULLINS: Can we go to C-635?

22 Q. You prepared this spreadsheet, correct?

23 A. That is correct, sir.

24 Q. And as it says there, this is the 10 hectares
01:52:34 25 that you were mentioning earlier?

01:52:40 1 A. Precisely, based on the 2017 production.
2 Clearly, we used for seeding the 10 hectares, the
3 average weight, and this is the chart that I summed up.

4 So only 10 hectares, not the 14 for the
01:53:02 5 harvest. So he used the year of the 14.87 hectares.

6 Q. So to go back into your statement, then, this
7 is calculating based on the 10, but the chart was based
8 on --

9 MR. MULLINS: Go back to his witness
01:53:18 10 statement.

11 Q. The chart was based on 14, correct?

12 A. Yes. Precisely, yes.

13 Q. Were there more or less trees in the 10-hectare
14 area than in the 5,948 trees referenced in Chart A?

01:53:53 15 A. But lot 8 refers to the 14.87 hectares that are
16 5,948. In that year there were only 10 hectares that
17 are equivalent to 4,000 plants, the one that yielded
18 fruit.

19 Q. So in your mind, does that affect the
01:54:19 20 calculation made today?

21 A. Yes, yes. The calculation by the attorney,
22 because he did it based on 14.87, and in my document I
23 showed clearly that it was the 60,000 pieces of fruit
24 were produced in 10 hectares. The only thing here is
01:54:49 25 that this is referring to the year of the lot.

01:54:53 1 Q. Have you ever heard of the phrase "garbage
2 in-garbage out"?

3 PRESIDENT: No, I don't think that
4 question arises out of the cross.

01:55:05 5 MR. MULLINS: Okay. It was just a phrase
6 that counsel liked to use in their opening.

7 I don't have any further questions.

8 PRESIDENT: Thank you very much. Any
9 questions from my colleagues?

01:55:23 10 QUESTIONS BY THE TRIBUNAL

11 MS. GREENWOOD: Just one question,
12 Mr. Gutiérrez. Going back to the anticipated yield on
13 the trees that were being harvested in 2017, help the
14 Tribunal understand your references to 20 kilograms per
01:55:40 15 tree?

16 MR. GUTIÉRREZ: The reference of
17 20 kilograms is not for the harvest, the actual harvest,
18 but it was the expected harvest for the next year. So
19 how did we get there?

01:56:00 20 So when the fruit starts to mature -- so
21 first you have something small that continues to grow,
22 that is your avocado. So at one point we can estimate
23 what our harvest will be.

24 How do we do that? We take in one hectare
01:56:17 25 several random points. In one hectare we had 400 trees.

01:56:22 1 Out of the 400 trees, we took 20 trees randomly. So we
2 counted tree by tree, we added up all the fruit and
3 averaged out per hectare. So that is our expected
4 average for the next year what to expect next year.

01:56:42 5 20 kilograms per hectare -- rather, 20 kilograms per
6 tree.

7 MS. GREENWOOD: And your expectation in
8 that regard was for 2018, and I don't want to put words
9 in your mouth, but if I'm understanding you correctly,
01:56:57 10 you reached that by calculating what you got in 2017?

11 MR. GUTIÉRREZ: In 2017, we already had
12 the harvest that we expected for 2018 when the invaders
13 took our property. So we already had the idea of the
14 2018 harvest, and we had estimated the harvest based on
01:57:30 15 the level of maturity of the fruit.

16 MS. GREENWOOD: I think what I'm
17 struggling with, Mr. Gutiérrez, is that your Excel
18 spreadsheet shows that you were getting a rough yield of
19 3.75 kilograms a tree of the 4,000 trees that were
01:57:47 20 planted in the 10-hectare space.

21 So if you can help the Tribunal understand
22 your evidence regarding going from that number to the
23 20-kilogram per tree number?

24 MR. GUTIÉRREZ: As I mentioned before, in
01:58:08 25 this type of harvest, in this type of crop, the plant is

01:58:13 1 just starting. It is the first production. The second
2 time you're going to have more mature, more ripe fruit
3 because you already had one harvest. That growth is in
4 December or November. We had an invasion in June. We
01:58:34 5 already had the maturity, so when we started to see the
6 maturity in the fruit in the second harvest, we already
7 had the estimate per hectare based on what we had seen
8 get ripe in our second expected harvest.

9 MS. GREENWOOD: One final question. It
01:58:56 10 would be in relation to those 4,000 trees you would be
11 expecting a yield of 20 kilograms per tree because, as
12 you've helpfully explained, you expect the fruit to be
13 larger, there to be more fruit on the tree. Is that
14 correct?

01:59:15 15 MR. GUTIÉRREZ: Yes, indeed.

16 MS. GREENWOOD: Thank you.

17 MR. GUTIÉRREZ: You're welcome.

18 PRESIDENT: I will have a couple of
19 further questions. And if you could look at your first
01:59:30 20 witness statement and paragraph 116, you say there that
21 under the orders of Mr. Rondón, Mr. Palacios and
22 Mr. Ferrufino stayed on the Hacienda and you said that
23 you went to the Hacienda during the day, but left at
24 night.

02:00:12 25 I understand from your evidence during the

02:00:15 1 cross-examination that what you're talking about here is
2 the period August 14 and August 17. Is that the period?

3 MR. GUTIÉRREZ: That is right,
4 Mr. President.

02:00:34 5 PRESIDENT: And then you describe in the
6 next paragraph how the invaders came back on August 17.

7 Now, if we then go to -- if we then go to
8 paragraph -- no, page 28, first, and in paragraph 144
9 you are referring to the removal of the invaders from
10 the property on August 13, 2021.

02:01:49 11 So what I'm interested in is your
12 whereabouts between these two dates -- August 17, 2018
13 and August 13, 2021 -- the three years. Were you still
14 living or visiting Hacienda Santa Fé during day time or
02:02:24 15 at all?

16 MR. GUTIERREZ: I continued visiting in
17 order to monitor the invaders.

18 PRESIDENT: During this particular period?

19 MR. GUTIERREZ: Yes, sir. No. Just in
02:02:51 20 2018.

21 PRESIDENT: My question was about the
22 period from August 17, 2018 until August 13, 2021.
23 During that three-year period, when the invaders had
24 come back, did you still visit the farm or live on the
02:03:12 25 farm?

02:03:22 1 MR. GUTIERREZ: I no longer visited after
2 they returned on 17 August. I didn't go back to visit
3 the farm. We had information because there were some of
4 the workers who were mixed in with those people. But I
02:03:42 5 didn't go back to the farm.

6 PRESIDENT: You don't need to disclose
7 your whereabouts if you don't want to during this
8 three-year period, but you were still in the region or
9 in Nicaragua still?

02:03:59 10 MR. GUTIÉRREZ: Yes, I continued to be in
11 Jinotega, but I did not leave my home. That is to say,
12 I was in the same region. My house is 33 kilometers
13 from the farm.

14 PRESIDENT: I believe you said that some
02:04:12 15 of the workers still remained on the farm, some of the
16 former workers of Hacienda Santa Fé during that
17 three-year period?

18 MR. GUTIÉRREZ: We had Jaime Vivas. He
19 was passing himself off as an invader in order to be
02:04:36 20 able to pass on information of the activities of the
21 invaders and to keep us abreast of the disasters that
22 they would commit.

23 PRESIDENT: After August 2018?

24 MR. GUTIÉRREZ: Yes, sir.

02:05:08 25 PRESIDENT: You were still in touch with

02:05:10 1 these former workers, including Jaime Vivas, during that
2 three-year period?

3 MR. GUTIÉRREZ: Yes, sir.

4 PRESIDENT: In regular contact?

02:05:30 5 MR. GUTIÉRREZ: When he could call me,
6 because the signal on the farm, since it's a very
7 forested area, has a lot of interference and sometimes
8 two or three days go by and it's not possible to
9 connect.

02:05:43 10 PRESIDENT: So what did he tell you about
11 what was going on in the farm, again during that
12 three-year period?

13 MR. GUTIÉRREZ: Yes, that the invaders
14 continued clearing the lands. They would clear and they
02:06:08 15 would burn -- they would set the fields ablaze in order
16 to then grow crops. He had mixed in with them as though
17 he was one more invader because he told them he was
18 going to ally with them and they even offered him land.

19 PRESIDENT: Thank you very much.
02:06:34 20 Mr. Gutiérrez. That concludes your examination. Thank
21 you for your time, and thank you for being available.

22 MR. GUTIÉRREZ: Thank you for
23 understanding what I've had to say.

24 PRESIDENT: Then we continue with the
02:06:57 25 examination of Mr. Welty. He's available?

02:07:02 1 MR. APPLETON: I think he's in the holding
2 room. Shall we fetch him?

3 PRESIDENT: Let's start with his
4 examination so that we still can go on for a while
02:07:13 5 before the next break. So we'll wait for him to be
6 brought to the room.

7 MR. RAMOS-MROSOVSKY: Mr. President, can
8 we request a three-minute pause?

9 PRESIDENT: That's fine. Let's take a
02:07:40 10 five-minute technical break.

11 *(Brief Recess)*

12 PRESIDENT: Okay. We will go on.

13 **RUSSELL WELTY**

14 PRESIDENT: Good afternoon, Mr. Welty, and
02:14:24 15 welcome.

16 MR. WELTY: Good afternoon.

17 PRESIDENT: Can I ask you first to state
18 your full name for the record, please?

19 MR. WELTY: Russell Welty.

02:15:00 20 PRESIDENT: Thank you. You have been
21 called as a witness of fact in this proceeding and, as a
22 witness of fact, you will be required to tell the truth.
23 So for that purpose I would ask you to make the
24 declaration. You should have the text in front of you.
02:15:10 25 Please.

02:15:12 1 MR. WELTY: I solemnly declare upon my
2 honor and conscience that I shall speak the truth, the
3 whole truth, and nothing but the truth.

4 PRESIDENT: Thank you very much.

02:15:23 5 You have submitted one witness statement
6 in this arbitration dated 28 October 2023. You should
7 have a hard copy of that statement in front of you. Do
8 you have it?

9 MR. WELTY: Yes, I do.

02:15:42 10 PRESIDENT: Can you confirm that is your
11 statement?

12 MR. WELTY: Yes, it is.

13 PRESIDENT: **Very good. The way it will**
14 **work now, as you probably know,** there will **first** be a
02:15:51 15 direct examination by counsel for the Claimant, a
16 relatively short one, then a cross-examination by
17 counsel for the Respondent, Republic of Nicaragua, and
18 possibly further questions on redirect by counsel for
19 the Claimant. The three members of the Tribunal may put
02:16:09 20 questions to you at any time. Is that understood?

21 MR. WELTY: Yes, it is.

22 PRESIDENT: Very good. Mr. Appleton, for
23 your team, please go ahead.

24
25

02:16:20

1

DIRECT EXAMINATION

2

BY MR. APPLETON:

3

Q. Good afternoon, Mr. Welty. You can hear me,

4

yes?

02:16:26

5

A. Yes, I can.

6

Q. Thank you very much for being here. I don't

7

know if the President has told you, but a copy -- yes,

8

the copy is there, correct?

9

A. Yes.

02:16:33

10

Q. Just want to make sure you're comfortable.

11

This is the first time, sir, that you've ever testified?

12

A. Yes, it is.

13

Q. In any type of session or hearing?

14

A. Yes.

02:16:43

15

Q. Well, just the whole idea is that, you know, it

16

can be intimidating, so just try to breathe and relax.

17

If you need anything, you can ask the Tribunal, you can

18

ask the secretary, that you have some water or anything

19

else.

02:16:57

20

If you can't understand the question or

21

it's too fast, just let us know. We'll all do our best.

22

It's easiest for all of us if you can understand what's

23

going on. Okay? Because it's not a normal situation,

24

we understand. But we appreciate you coming here today.

02:17:15

25

Okay?

02:17:16 1 A. Okay.

2 Q. All right. So you filed this witness
3 statement. It talks about your expertise and the work
4 that you did with respect to the avocado project at
02:17:27 5 Hacienda Santa Fé. Can you please tell us about your
6 expertise, sir?

7 A. Sure. My expertise is in finance and equity
8 analysis. I have a Master's degree in finance, and I
9 obtained that in 1993, after which I worked in the
02:17:47 10 investment industry as an equity analyst.

11 Early position was with an investment firm
12 where I researched companies, analyzed the companies,
13 researched reports and recommended companies for
14 purchase or sale by our clients, who were institutional
02:18:11 15 equity money managers.

16 Then I worked with an actual money
17 management firm as a senior analyst, where I worked on
18 three separate funds -- a microcap, a mid cap and a
19 small cap fund, where we managed \$1.5 billion in assets.
02:18:33 20 I would note that our microcap fund was one of the top
21 performing funds during my tenure at the firm, where we
22 were in the top 10 percentile of performance.

23 In addition, I have worked with -- doing
24 some financial consulting as well as being the CFO.

02:18:55 25 Q. Okay. Could you describe your role within the

02:18:58 1 avocado operations at Hacienda Santa Fé?

2 A. I joined the activities at Hacienda Santa Fé in
3 2015, at the request of Carlos Rondón, to help him
4 analyze or look at raising capital to expand his Hass
02:19:23 5 avocado operation.

6 And in that process I developed a business
7 plan to speak with potential investors about helping our
8 effort to grow our business. In that process, I
9 analyzed basically all aspects of the business, from

02:19:43 10 putting the avocados into the ground to getting them to
11 our customer. And that entailed working with -- or
12 having some understanding of all the different aspects
13 associated with that, so from the standpoint of agronomy

14 to growing the costs associated with developing the farm
02:20:08 15 as well as once you have the product, then how do you
16 get that product to market from the standpoint of you
17 harvest it, you pack it, you ship it and you need to

18 find the opportunities or the places where you can put
19 those -- that product into the market. So I was
02:20:28 20 involved in looking at accessing different markets
21 around the world and the logistics associated with that.

22 Q. Why don't you just tell us -- just summarize
23 the efforts you took to deal with getting products
24 around the world. So you mentioned this in your report.
02:20:46 25 Can you summarize what you did with respect to export

02:20:51 1 market and market access?

2 A. You know, market access is that obviously you
3 look at -- you've got Asia, Europe -- Asia, Europe and
4 North America are the three main markets that would make
02:21:06 5 sense for us to pursue.

6 I focused or I did research on those
7 markets through various channels, but we looked at
8 understanding that process.

9 Q. And can I ask you, do you have any corrections
02:21:28 10 that you need to make to your witness statement today,
11 sir?

12 A. Yes, I do.

13 Q. All right. Could you just take us through
14 that?

02:21:36 15 A. Okay. Throughout my witness statement we -- I
16 referred to the World Avocado Congress. The reality,
17 the exact name of it was the Latin American Avocado
18 Congress. That happens in seven locations, eight
19 locations. It's paragraph 33.

02:21:52 20 Q. Hold on a second. Where I see World Avocado
21 Congress, for example, in paragraph 33, you're saying
22 that's the Latin American? Is that your testimony?

23 A. That is correct.

24 Q. And you're saying that -- so every time we see
02:22:06 25 that it should have been the Latin American rather than

02:22:13 1 World?

2 A. Yes.

3 Q. And you say that occurs, you said, in eight

4 places?

02:22:17 5 A. Yes.

6 Q. You don't need to take us to each of the eight

7 if you tell us the paragraph numbers, if that's all

8 right. What are the paragraph numbers you want to

9 change it in?

02:22:21 10 A. 33.

11 Q. Yes.

12 A. 34, 46 --

13 Q. Yes. Hold on, just a little slower. Yes?

14 A. 46.

02:22:28 15 Q. Yes.

16 A. 57.

17 Q. Yes.

18 A. 66.

19 Q. Hold on. Yes?

02:22:35 20 A. 94.

21 Q. Yes.

22 A. And 105.

23 Q. So each time we see the reference to the World

24 Avocado Congress, it should be the Latin American

02:22:50 25 Avocado Congress?

02:22:51 1 A. Yes.

2 PRESIDENT: Paragraph 36, presumably, as
3 well?

4 MR. WELTY: I'm sorry?

02:22:58 5 PRESIDENT: Paragraph 36, presumably, as
6 well?

7 A. Yes.

8 Q. You may have missed that because I only counted
9 seven as well.

02:23:04 10 MR. APPLETON: Thank you, Mr. President.
11 Everybody's counting here.

12 Q. Okay. Do you have additional changes, sir?

13 A. Yes. In paragraph 44, Chart A --

14 Q. Hold on. 44 and Chart A. Yes?

02:23:19 15 A. Line 8 referred to Mike Donnelly at MDB
16 Capital. That should read "GVC Capital."

17 Q. Okay. Got that. Yes?

18 A. And then in paragraph 52, we put the wrong name
19 in there. It says Luisa Mayorga. It was actually
02:23:50 20 Monica Navarrete.

21 Q. As it is in the chart?

22 A. Correct.

23 Q. I see. Okay. And then do you have another
24 one, sir?

02:24:00 25 A. Yes. In paragraph 59 there's two corrections

02:24:03 1 here. The first one is a name that I referred to in
2 this -- I say "Tom Brokaw." The man's name is actually
3 Rob Brokaw.

4 Q. The President understands the joke. If you've
02:24:23 5 been in America, you understand the joke. Yes?

6 A. And the other is I referenced that the patent
7 holder of the Hass avocado patent is Brokaw Nurseries.
8 That is incorrect. The original patent was issued to,
9 obviously, Dr. Hass in 1935. And the Brokaw Nurseries
02:24:46 10 actually worked very closely with Dr. Hass, but they did
11 not technically own the patent.

12 Q. Okay. So we appreciate you clarifying this.
13 Other than that, so those are all your corrections, yes?

14 A. No, I've got two more.

02:25:01 15 Q. Oh, okay. Tell us about it.

16 A. They're both basically the same, but in
17 paragraph 91 and paragraph 93.

18 Q. Hold on. Yes. So take us to 91. What's the
19 change, sir?

02:25:16 20 A. In the second to last, or third last line, I
21 say, "The Canadian market price was on a par with the
22 US." That is not accurate. It should say, "The market
23 price was usually at a discount to the US."

24 Q. So you wanted to change "on a par" with
02:25:32 25 "usually at a discount"?

02:25:35 1 A. Or actually "a discount."

2 Q. Usually at a --

3 A. No, just "a discount".

4 Q. Oh. Okay. I understand.

02:25:43 5 A. And then in paragraph 93, it's basically the
6 same, but it's "The pricing of the Hass avocado in
7 Canada mirrored," and it should just say "was also
8 discounted to that of the United States."

9 Q. All right. Now, that's it, sir?

02:26:04 10 A. Yes, it is.

11 Q. All right.

12 MR. APPLETON: We have nothing further.

13 Thank you very much. I'm going to turn you over to

14 counsel for the Republic of Nicaragua. They'll have

02:26:12 15 questions for you, and they'll be over on that side of
16 the floor, and then perhaps later we may have some
17 questions arising. Then it comes back here. Thank you
18 very much.

19 PRESIDENT: Thank you, Mr. Appleton.

02:26:28 20 MS. GONZÁLEZ: Thank you, Mr. President.

21 Mr. Ramos-Mrosovsky will conduct his cross-examination.

22 PRESIDENT: Please proceed.

23 **CROSS-EXAMINATION**

24 BY MR. RAMOS-MROSOVSKY:

02:26:35 25 Q. Good afternoon, Mr. Welty. My name is Carlos

02:26:37 1 Ramos-Mrosovsky. I represent the Republic of Nicaragua.
2 Thank you for sharing this rather unusual 4th of July
3 with us.

4 I'll be asking you some questions about
02:26:44 5 your evidence. Before we begin, let me just touch on a
6 few practical points that my friend, Mr. Appleton, did,
7 but just before we get started on my questioning for
8 you, please keep in mind that we are being interpreted
9 simultaneously into two languages. This is advice for
02:27:04 10 myself as well, but please wait for me to complete my
11 question before answering. Otherwise, it can get a bit
12 confusing for those who may be following along in
13 Spanish.

14 A. Okay.

02:27:18 15 Q. Secondly, I'd just remind you that as we're
16 being transcribed, only verbal answers register. So
17 nodding or shaking one's head and so on doesn't get
18 picked up in the transcript.

19 A. Okay.

02:27:31 20 Q. As a procedural matter, Mr. Appleton alluded to
21 this, Riverside's lawyers will have a chance to ask you
22 questions as well, so please try to answer my questions
23 only and be assured that you will be able to answer
24 questions from the Claimant's lawyers in due course.

02:27:49 25 A. Okay.

02:27:50 1 Q. Of course, if there's a question I ask you that
2 doesn't make sense, you get confused, please ask me to
3 repeat it, and I will. You've already authenticated
4 your witness statement. I think it's in front of you,
02:28:03 5 correct?

6 A. Yes.

7 Q. And on page 19, I believe you signed it. I'll
8 just confirm that for the record?

9 A. Yes, that's my signature.

02:28:14 10 Q. And you did so on the 28th of October 2023. Is
11 that right?

12 A. Yes.

13 Q. And you affirmed that "all of the above is true
14 and correct and corresponds to my understanding of the
02:28:26 15 facts."

16 A. Yes.

17 Q. Did you have assistance from Riverside's
18 attorneys in preparing your witness statement?

19 A. Yes. I put the information in there, and
02:28:43 20 they -- so the information is my information.

21 Q. And they packaged it, and you approved it.
22 Would that be a fair summary?

23 A. That would be a fair assessment.

24 Q. Did they instruct you to provide all the
02:28:58 25 relevant supporting documents that you had?

02:29:00 1 A. Yes, they did.

2 Q. And I take it they suggested the matters upon
3 which you should offer evidence that are reflected in
4 your statement?

02:29:09 5 A. Yes.

6 Q. Have you communicated with Mr. Kotecha about
7 your evidence?

8 A. I have not.

9 Q. Do you know who Mr. Kotecha is?

02:29:18 10 A. Yes, I do.

11 Q. Have you reviewed his expert report submitted
12 by the Claimants at any time?

13 A. I have.

14 Q. You have. Have you reviewed both of his
02:29:27 15 reports?

16 A. Both of them, yes.

17 Q. Now, I see that you reference various exhibits
18 in your witness statement. These are the supporting
19 exhibits for your testimony, correct?

02:29:45 20 A. Yes.

21 Q. Would it be fair to say that you attached all
22 of the documents you had that you considered relevant to
23 your testimony?

24 A. Yes.

02:29:51 25 Q. And so, just for the record, are you receiving

02:29:54 1 any kind of compensation for your testimony today?

2 A. No, I am not.

3 Q. Now, how long have you known Mr. Rondón?

4 A. I met Mr. Rondón early -- in the early 2000s.

02:30:09 5 Our daughters were at the same school in kindergarten we

6 started, and they were in school together for 13 years.

7 So I've had a relationship with the Rondón family since

8 that time. 2001, 2002, 2003.

9 Q. Would it be fair to say you're friends?

02:30:30 10 A. Yes.

11 Q. And over the course of this friendship, I

12 understand you discussed business matters as well, in

13 particular his, at that time, coffee business at

14 INAGROSA. Is that right?

02:30:41 15 A. Yes, we did.

16 Q. You mentioned in your witness statement

17 visiting Mr. Rondón at INAGROSA'S Denver, Colorado

18 office. Do you remember saying that in your witness

19 statement?

02:30:56 20 A. I don't remember specifically.

21 Q. Why don't you have a look at paragraph 11?

22 A. Paragraph 11?

23 MR. RAMOS-MROSOVSKY: Can we pull it up,

24 Mr. Ricky?

02:31:09 25 Q. Is it on your screen?

02:31:11 1 A. Yes, it is.

2 Q. And, Mr. Welty, just to be clear, when we say
3 there was a Denver, Colorado office, would that have
4 been located within the Rondón's residence in Littleton,
02:31:23 5 or was it a separate office?

6 A. No, it was a separate office in a warehouse.

7 Q. That's fine. Thank you.

8 Now, over the course of your conversations
9 with Mr. Rondón, you learned about the opportunities and
02:31:38 10 challenges of running an agricultural business, right?

11 A. Running a coffee business, yes.

12 Q. It was a coffee business at the time. It
13 wasn't yet an avocado business, was it?

14 A. Correct.

02:31:49 15 Q. And Mr. Rondón was running this business,
16 mostly remotely from Denver, with the coffee being in
17 Nicaragua, right?

18 A. Well, yes. He did spend quite a bit time in
19 Nicaragua.

02:32:02 20 Q. And at that time you were working in the
21 financial world, right?

22 A. Yes, I was.

23 Q. Now, if I understand your evidence correctly,
24 you went into -- you became self-employed as a
02:32:17 25 consultant starting in, is it 2004, 2005?

02:32:20 1 A. Yeah.

2 Q. And then maybe a decade or so later, 2015, your
3 professional involvement with INAGROSA began. Is that
4 right?

02:32:31 5 A. Yes, that's correct.

6 Q. That was after the Roya fungus had destroyed
7 the coffee business, right?

8 A. Yeah, the Roya had shown up in the 2012, 2013
9 time frame, I believe.

02:32:52 10 Q. So at the period you became involved with
11 INAGROSA, they were looking for a new crop, right?

12 A. They weren't looking. They had actually
13 already commenced their avocado operation at that point.

14 Q. They were transitioning from coffee to avocado
02:33:03 15 I believe is your testimony. Is that right?

16 A. Yes. In late 2015 when I was engaged.

17 Q. Please answer your question. I'm sorry, I
18 didn't mean to cut you off.

19 A. I was engaged in late 2015.

02:33:13 20 Q. Now, when you say you were engaged, I
21 understand you were the external CFO, CFO meaning chief
22 financial officer?

23 A. That's correct.

24 Q. Now, you were not formally employed by INAGROSA
02:33:28 25 at that time, were you?

02:33:29 1 A. No, I was not.

2 Q. Did you receive any compensation from INAGROSA?

3 A. No, I did not.

4 Q. Now, you were excited about the opportunity

02:33:39 5 that you believed this transition to avocados

6 represented, right?

7 A. Yes. I was very interested in it.

8 Q. You had learned about this business from

9 Mr. Rondón?

02:33:51 10 A. Early on, yes.

11 Q. So when you became this external CFO to

12 INAGROSA, would it be fair to say that part of your role

13 was business planning?

14 A. Yes, it was to develop a business plan with the

02:34:15 15 intent of raising capital to accelerate the growth of

16 the business.

17 Q. So you would be pitching this business plan to

18 potential institutional investors?

19 A. We were using that business plan as a

02:34:26 20 discussion piece to look for investors, correct.

21 Q. Now, I think you said you had intensive daily

22 involvement with INAGROSA in your witness statement. Is

23 that a fair characterization?

24 A. The characterization, when I put that in there,

02:34:42 25 the intensive daily involvement was Carlos and I

02:34:46 1 communicated pretty much on a daily basis.

2 Q. Were you working on other projects at the same
3 time, or was this a full-time project? How much of your
4 day, would you say?

02:34:56 5 A. It would vary throughout the time. When he was
6 in Nicaragua, it would be less. When he wasn't, we
7 would communicate. Some days I'd spend, you know, a
8 full day with him, some days a half day with him. I was
9 doing some other work on the side.

02:35:16 10 But it was intensive in the sense that I
11 was working with him pretty much on a daily basis. We'd
12 have a phone conversation or in person conversation, and
13 have for years, so -- during that time frame.

14 Q. Let me ask you, Mr. Welty, you've explained to
02:35:36 15 us that you weren't receiving any compensation from
16 INAGROSA for this work you were doing. Did you have any
17 other business relationships with Mr. Rondón?

18 A. No.

19 Q. With the Winger family?

02:35:51 20 A. No.

21 Q. Now, you prepared all of the business plans
22 that I think are listed in your witness statement,
23 correct?

24 A. Yes.

02:36:02 25 Q. You would have had input from Mr. Rondón

02:36:04 1 obviously, right?

2 A. Oh, yes.

3 Q. Did you have any other team or staff assisting
4 you with them, or were they your work?

02:36:11 5 A. This was my work.

6 Q. It was your work.

7 Now, when you were in the financial world,
8 if I understand your work correctly as an analyst, were
9 you making recommendations about whether your employer's
02:36:32 10 clients should make investments in particular companies?

11 A. I would make recommendations, and it was their
12 choice whether or not they would listen to those
13 recommendations or act on those recommendations.

14 Q. Would it be fair to say that you would identify
02:36:51 15 the factors that they should consider in making those
16 decisions?

17 A. Correct. Well --

18 Q. In your opinion.

19 A. Yeah. To clarify, I would make -- when I was
02:37:04 20 on the sell side of the business, as they call it, I
21 would make those recommendations. When I was on the buy
22 side of the business where we managed the money, I would
23 make the recommendations and we would, with the
24 portfolio manager, make the decision whether to purchase
02:37:17 25 or buy it.

02:37:18 1 So I wanted to clarify those two -- it
2 wasn't just one. It was both.

3 Q. You were on both sides?

4 A. Where I had -- I had definite input or impact
02:37:28 5 on making those decisions.

6 Q. I understand. No, that's helpful. Thank you.

7 So in making these decisions or these
8 analyses, I take it you would have studied the financial
9 statements of some of the businesses involved?

02:37:44 10 A. Yes.

11 Q. And you might have looked at the structure of
12 the available markets for their product or of services
13 they were selling?

14 A. Yeah, there was -- yeah, there was a whole -- I
02:37:57 15 don't want to say checklist, but there was a whole list
16 of things that you would look at in those companies to
17 help formulate your decision.

18 Q. Would you have looked at their historical
19 returns, for example?

02:38:09 20 A. That would be one input, yes.

21 Q. Would you have looked at regulatory
22 considerations for a new line of business, potentially?

23 A. Yes.

24 Q. What other factors would you have looked at,
02:38:22 25 Mr. Welty?

02:38:23 1 A. Well --

2 Q. You said there was a checklist. I'm curious
3 what else was on it.

4 A. You would look at competitive situations,
02:38:31 5 product -- new product introductions, life cycles of
6 products. You would look at managements. I mean, you
7 could go on and -- you know, those are several of the
8 things that you would look at.

9 Q. You've given me a helpful flavor, so thank you
02:38:48 10 for that answer.

11 Now, when you were working with INAGROSA,
12 I take it you drew upon your experience in the finance
13 world to prepare the pitches we discussed?

14 A. Yes.

02:39:05 15 Q. And there was a list in your witness statement.
16 We can pop it up. I know there have been some
17 corrections to this list, and we aren't able to reflect
18 those corrections on the screen, Mr. Welty, but I assure
19 you we heard them.

02:39:21 20 A. Okay.

21 MR. RAMOS-MROSOVSKY: Can we have -- I
22 think it's CWS-11, page 7, Mr. Ricky. There we go.

23 Q. So when you were sending these pitches out to
24 these various external investors listed there,
02:39:34 25 Mr. Welty, were you at least in part drawing on

02:39:38 1 professional contacts from your time in the finance
2 world?

3 A. Yes.

4 Q. And you told me earlier you prepared all of
02:39:46 5 these yourself. INAGROSA, it would be fair to say, was
6 your first project working in the agricultural sector?

7 A. To this capacity, yes, but I had looked at
8 companies over my career that had some association with
9 agricultural -- the agricultural industry.

02:40:17 10 Q. I think you said "to this capacity." You mean
11 to this extent, the depth of your involvement was new?

12 A. Correct.

13 Q. That's why, in preparing these pitches to the
14 external investors, you conducted, I think you said,
02:40:30 15 firsthand research into the successful Mexican Hass
16 avocado industry. Is that right?

17 A. Yes.

18 Q. And among other things, you researched
19 international markets for avocados, marketing
02:40:44 20 participants and logistics for sales into international
21 markets. Is that right?

22 A. Yes.

23 Q. And you started that research in 2015 when you
24 came onboard as a voluntary external CFO for INAGROSA,
02:40:57 25 right?

02:40:58 1 A. Yes, that would have been when I started doing
2 some research on that, which continued throughout the
3 time I was with them.

4 Q. Did there come a time in November of 2015 when
02:41:11 5 you visited Hacienda Santa Fé?

6 A. Yes, I did.

7 Q. And how long were you there?

8 A. We were in Nicaragua for a week. I don't
9 recall the exact number of days.

02:41:30 10 Q. A number of days?

11 A. Yes.

12 Q. I don't need a more specific answer than that.
13 I appreciate it.

14 How long do you think you were on Hacienda
02:41:39 15 Santa Fé? Most of the time? Half of the time?

16 A. No, less than -- less than all of the time.

17 Q. So maybe half of a trip. Time for arriving,
18 leaving and driving? I'm just trying to get a picture.

19 A. It was a full day at the Hacienda.

02:41:59 20 Q. A full day at the Hacienda?

21 A. Yes.

22 Q. And you visited with Mr. Rondón?

23 A. I -- yeah.

24 Q. He took you there?

02:42:06 25 A. Yeah. He was my host, yeah.

02:42:07 1 Q. You don't speak Spanish, do you, Mr. Welty?
2 A. No, I do not. I wish I did.
3 Q. So was Mr. Rondón interpreting for you?
4 A. Yes.

02:42:18 5 Q. So you would have relied on him for a lot of
6 the information you were receiving in practical terms,
7 right?
8 A. For the conversations that we had, yes.

02:42:31 9 Q. Now, when you were at Hacienda Santa Fé in
10 2015, do you recall whether there was any electricity on
11 the premises?
12 A. I don't recall specifically seeing that. I'm
13 trying to recollect. I don't recall.

02:43:02 14 Q. Do you recall if you saw a large refrigerated
15 warehouse at Hacienda Santa Fé in November of 2015?
16 A. I did not see one, no.

17 Q. Incidentally, I know you were working in a
18 voluntary capacity, but did INAGROSA pay for your travel
19 to Nicaragua?
02:43:17 20 A. Yes, they did.

21 Q. Now, I understand you made a second trip to
22 Nicaragua. I believe it would have been 2017?
23 A. Yes.

02:43:37 24 Q. If we could pull up Mr. Welty's second witness
25 statement, paragraph 32. You should have a hard copy as

02:43:42 1 well, but just so that everyone can see.

2 This, Mr. Welty, I think is just a
3 ministerial question but, you know, I see here on the
4 screen we have November and September. Do you recall
02:43:51 5 which it was?

6 A. It was September.

7 Q. It was September, okay.

8 A. That's a good catch. That was -- I missed that
9 one.

02:44:00 10 Q. That's all right. Thank you.

11 A. It was November 2015, September 2017.

12 Q. I'm sure that's how the error came in.

13 Now, on that trip, I understand you made
14 two stops, right? You went to the Latin American
02:44:20 15 Avocado Congress first?

16 A. Yes, we had a trip to Mexico first and then
17 went there.

18 Q. Was that your first Latin American Avocado
19 Congress?

02:44:31 20 A. Yes, it was.

21 Q. Have you attended avocado congresses since?

22 A. No, I have not.

23 Q. And you attended that with Mr. Rondón?

24 A. Yes.

02:44:45 25 Q. And while you were there, you were learning

02:44:47 1 more about the industry, right?

2 A. Yes, it was a great source of information.

3 Q. I think, among other things, I think you put
4 this in your witness statement, you said you learned
02:44:58 5 that high density planning was key to excellent yields.
6 Does that sound correct?

7 A. Yes.

8 Q. Now, after attending the Latin American Avocado
9 Congress, you went to Hacienda Santa Fé, right?

02:45:11 10 A. Yes.

11 Q. How long would you say you were there on this
12 trip?

13 A. We were in Nicaragua for -- or I was in
14 Nicaragua for four days probably. Four or five days
02:45:27 15 again.

16 Q. And of those four or five days you were in
17 Nicaragua, how many would you say you were at Hacienda
18 Santa Fé?

19 A. I was there for another day.

02:45:36 20 Q. Another day. These are the only -- just so
21 we're clear for the record, these are the only two trips
22 you've made to Hacienda Santa Fé?

23 A. Yes.

24 Q. So in total, we'd agree you've spent two days
02:45:48 25 at Hacienda Santa Fé?

02:45:50 1 A. Yes.

2 Q. Have you visited any other avocado plantations?

3 A. Yes, I have.

4 Q. When did you do that, Mr. Welty?

02:45:57 5 A. Before this trip, in Mexico. September 2017.

6 Q. Did you mention them in your witness statement?

7 A. I don't recall mentioning that in my witness

8 statement that I visited.

9 Q. Which were these other avocado plantations that

02:46:13 10 you visited?

11 A. So at the Latin American Avocado Congress, they

12 had several opportunities for visiting different types

13 of facilities associated with the avocado trade. So one

14 of the trips was a trip to a very large -- it was

02:46:37 15 Zapotitlán was the name of the company and it was up on

16 the hills outside of Ciudad Guzman and it was a pretty

17 extensive -- it was a very large avocado plantation.

18 Q. Did they bus you there from the conference or

19 something like that?

02:46:55 20 A. Yes, they did.

21 Q. Now, taking you back to November 2015, after

22 your day at Hacienda Santa Fé, you started preparing the

23 business plans that you were going to pitch to potential

24 investors, correct?

02:47:11 25 A. Yes.

02:47:14 1 Q. I assume you tried to make these as persuasive
2 as you could with the information you had?

3 A. I put the information that I had available at
4 the time.

02:47:27 5 Q. And you believed the information in them to be
6 correct?

7 A. Yes.

8 Q. Now, I think you've acknowledged making some --
9 the term you used was "simplifying some details." You
02:47:44 10 used some assumptions in preparing these plans. Is that
11 right?

12 A. Yes. Yes.

13 Q. And one of these -- I'll just direct you so
14 that we know what we're talking about, to paragraph 42
02:47:56 15 of your witness statement.

16 Maybe, Ricky, you could put this up.

17 One of these simplifications you made --
18 have you had a chance to look at it, Mr. Welty? One of
19 these simplifications was rounding down the number of
02:48:21 20 hectares of planted avocado trees, right?

21 A. Yes, from 44.75 to 40.

22 Q. And another simplification you identify in your
23 witness statement was that you -- and I'm just going to
24 read this here -- "noted that we had 16,000 producing
02:48:39 25 Hass avocado trees in 2014, while in fact we had 17,900

02:48:48 1 planted avocado trees by 2017, but in 2014 we did not
2 have production." Do you see that?

3 Ricky is highlighting it for you. You can
4 probably see the yellow, but I can't see your screen.

02:49:10 5 A. Okay, so --

6 Q. That was your testimony, that you identified
7 this as being another simplification that you flagged in
8 your witness statement, correct?

9 A. Yes.

02:49:27 10 Q. This was something in your business plans that
11 you had simplified, that you've pointed out in your
12 witness statement that you simplified. I want to be
13 sure you can see it.

14 A. Can you repeat the statement again? I think
02:49:36 15 I'm a little bit confused here.

16 Q. I'll back up a little bit. I think we've been
17 a little bit unkind to the court reporter.

18 In your witness statement, Mr. Welty, you
19 acknowledged that you used some simplifications in the
02:49:53 20 business plans that you were preparing to pitch to
21 institutional investors, right?

22 A. Yes.

23 Q. One of those was rounding down the number of
24 hectares under cultivation from 44.75 to 40, right?

02:50:08 25 A. Yes.

02:50:12 1 Q. Another simplification, you acknowledge in your
2 witness statement that you had made in pitches, was that
3 while you had said that there were 16,000 producing Hass
4 avocado trees at Hacienda Santa Fé in 2014, in fact, in
02:50:29 5 2014 you did not have production?

6 A. We did not have production in 2014.

7 Q. Now, you described this simplification that
8 you've identified in your witness statement as
9 immaterial, correct?

02:50:46 10 A. Yes, in the evaluation that in the long term it
11 would not have any impact on the prospect of the
12 development.

13 Q. And you noted that there would have been some
14 clarifications once a final commitment was formed
02:51:05 15 through due diligence. Is that a fair characterization
16 of what you said?

17 A. Well, I -- yeah, what I would repeat here that
18 the business plans are always subject to due diligence.
19 That, if you look at the job of an investor, especially
02:51:20 20 a sophisticated investor, is they look at data and they
21 do their own due diligence to make their own decision.
22 They do not rely on other people's due diligence. They
23 do that themselves.

24 Q. And these differences, I think you describe as
02:51:38 25 being only in relation to the early development of the

02:51:41 1 project, right?

2 A. Correct.

3 Q. So just to be clear about what the actual facts
4 were -- and tell me if you disagree -- I think we can
02:51:52 5 agree that, in reality, this was an early development
6 project at the time you were describing, and not a
7 producing avocado farm in 2014, right?

8 A. Correct. That was not a great description on
9 the 2014 status.

02:52:19 10 Q. Let me ask you a question, Mr. Welty. And I
11 appreciate you've made this clarification in your
12 witness statement. Were you advised to make this
13 clarification, or was it your own thought to include
14 this?

02:52:29 15 A. Which --

16 MR. APPLETON: Excuse me. We have an
17 objection about attorney-client privilege. Perhaps you
18 might want to rephrase or deal with your question, but
19 to the extent you're asking what type of legal advice
02:52:40 20 was obtained, I'm not sure that's quite correct. There
21 are many ways you can phrase this. So you can ask a
22 question that will avoid that, and then we don't have to
23 have any objection. Could that be possible and we don't
24 have to worry about this?

02:52:54 25 MR. RAMOS-MROSOVSKY: If I may,

02:52:56 1 Mr. President --

2 PRESIDENT: As long as you are asking
3 about privileged communication between counsel and the
4 witness --

02:53:11 5 MR. RAMOS-MROSOVSKY: Mr. President, if I
6 may, I'm not asking for the content of those
7 communications, and I don't understand the witness to be
8 the client here. We have issues of the origin of
9 testimony here, and I'm just trying to clarify where
02:53:25 10 this clarification came from.

11 PRESIDENT: Please go ahead.

12 Q. Mr. Welty, did you include this clarification
13 at the instruction of counsel, or was it something you
14 felt personally was important to include?

02:53:41 15 MR. APPLETON: I'm sorry, we have to
16 object again, but Mr. Welty is the external CFO to
17 Riverside. Riverside is the client that's here.

18 There are ways that Mr. Ramos-Mrosofsky
19 can get to the issue that he wanted to without dealing
02:53:58 20 with the extent of privileged information that would go
21 on that, and so I would -- I don't know why he keeps
22 continuing that same way on where there would be
23 privilege. Because there are so many ways he could do
24 this in other ways that would get to the same spot. But
02:54:14 25 he continues to go exactly down that one route, and so

02:54:18 1 we have to continue to object on that basis until he
2 either modifies his question or finds another way to
3 deal with that, which I'm sure he's capable of doing
4 because he's an exceptionally capable lawyer.

02:54:30 5 MR. RAMOS-MROSOVSKY: Mr. President, I
6 understood that the Chair had already ruled on the
7 objection which has just been repeated.

8 PRESIDENT: You can ask whether he
9 discovered the issue or the error himself, or whether it
02:54:41 10 was pointed out to him.

11 Q. Mr. Welty, did you identify these errors
12 yourself, or were they pointed out to you?

13 A. They were pointed out to me.

14 Q. Who pointed them out to you, Mr. Welty?

02:54:57 15 A. I don't recall.

16 Q. If you don't recall, maybe there's no need for
17 an objection.

18 MR. APPLETON: I think that would
19 be correct.

02:55:06 20 MR. RAMOS-MROSOVSKY: We'll move on.

21 MS. GREENWOOD: Counsel, before you move
22 on, it would assist if you could give the reference to
23 the business plan in question and the paragraph in the
24 business plan that this paragraph 42 clarifies. They're
02:55:23 25 not all identical, the business plans.

02:55:26 1 MR. RAMOS-MROSOVSKY: No, they aren't.

2 MS. GREENWOOD: And I'm struggling to find
3 the reference that the witness is alluding to.

4 MR. RAMOS-MROSOVSKY: I'm glad you asked
02:55:34 5 that question, Arbitrator Greenwood, because, in fact,
6 we struggled with the same question. But the
7 clarification is in the witness statement. I'll ask the
8 witness, and maybe he can tell us.

9 MS. GREENWOOD: Yes, thank you. My
02:55:47 10 question may well have been more appropriately directed
11 to the witness. My apologies, Mr. Welty.

12 Are you able to point the Tribunal to the
13 part in the business plans that you're clarifying there?

14 A. I don't have access to the business plan.

02:56:06 15 MS. GREENWOOD: All right. I don't want
16 to detain you now. Do proceed, Counsel.

17 MR. RAMOS-MROSOVSKY: Thank you.

18 Q. Now, I would like to take you to -- I'm going
19 in the wrong direction. There's too many notes, I
02:56:30 20 apologize.

21 I would like to take you to CWS-11, your
22 witness statement. The chart again briefly.

23 A. Okay.

24 Q. There were 15 pitches you sent out over a
02:56:45 25 two-year period, correct?

02:56:48

1 A. Yes.

2 Q. And my understanding is that all of these were
3 iterations of the original pitch that you refined over
4 time. Is that fair?

02:56:59

5 A. Yes.

6 Q. And the earliest of these was a proposal you
7 sent to the Inter-American Development Bank, correct?

8 A. Yes.

02:57:14

9 Q. The latest, or the most recent, was the one you
10 sent to Glidepath Partners. Is that right?

11 A. Yes.

12 Q. I'd like to take a look at the proposal you
13 sent to the Inter-American Development Bank -- with
14 apologies, I may call the IADB from time to time.

02:57:31

15 MR. RAMOS-MROSOVSKY: That appears at
16 C-419, Mr. Ricky, if you could pull that up. We might
17 be having a technical moment.

18 Q. Please be patient, Mr. Welty. Here we are.
19 This document is familiar to you, Mr. Welty?

02:57:57

20 A. Yes, it is.

21 MR. RAMOS-MROSOVSKY: And, Ricky, can we
22 just show him the second page for a moment to make sure
23 it's all there?

02:58:06

24 Q. This is the entire document, these two pages.
25 Is that right?

02:58:06

1

A. Yes.

2

Q. Let's go back to the first page. It's titled

3

Rio Verde Hass Avocado Business Overview, correct?

4

A. Yes.

02:58:17

5

Q. Now, the Rio Verde was to be a trade name,

6

right?

7

A. Yes, it was a name we had identified to call

8

this project.

9

Q. Was there a Rio Verde on the property?

02:58:29

10

A. It was just a name.

11

Q. Now, in this first paragraph of this pitch to

12

the IADB you say INAGROSA is seeking \$16 million,

13

correct?

14

A. Yes.

02:58:46

15

Q. It's seeking those \$16 million to plant 160,000

16

avocado trees on 400 hectares of land. Is that right?

17

A. Yes.

18

Q. You also note in this paragraph to the IADB

19

that avocado trees are native to the farm, right?

02:59:04

20

A. Avocado trees are, yes.

21

Q. I appreciate that this was early on in your

22

involvement at INAGROSA, but just so that we're clear,

23

you were not referring specifically to Hass avocados,

24

were you?

02:59:15

25

A. That is correct.

02:59:16 1 Q. Because Hass avocados are a patented technology
2 which you would have had to bring in, correct?

3 A. Yes. And I do note that there was a comment in
4 one of the documents that said Hass avocado trees are
02:59:30 5 not native to Hacienda Santa Fé, and that's correct.

6 Q. Mr. Welty, I promise you, you'll have redirect,
7 and I'm sure that Riverside's counsel will take you
8 there.

9 I'd like to direct you to the second page
02:59:51 10 of this document which you wrote. I believe you say
11 here that the region in which the Hacienda Santa Fé is
12 located suffered the brunt of a decade-long civil war in
13 the 1980s? Maybe we can highlight that for him.

14 A. Yes.

03:00:13 15 Q. Now, was that based on your evaluation of the
16 history, or is that something you learned while you were
17 there?

18 A. That was something that I learned while I was
19 there.

03:00:21 20 Q. Would you have learned that from Mr. Rondón or
21 from others?

22 A. Mr. Rondón and others.

23 Q. Now, this was the first pitch you sent out,
24 we've established. Let's look at the next one, which I
03:00:37 25 believe was also to the IADB?

03:00:40

1

A. Yes.

2

Q. This should be document C-405. This one you sent in November of 2016, right?

3

4

A. If this was --

03:01:02

5

Q. We can go to the chart, if it helps. I don't know what the date is on this.

6

7

A. Yeah, that makes sense. I've got the chart right in front of me.

8

9

Q. Great. If you could keep it open, otherwise we'll be jumping around an awful lot.

03:01:12

10

11

Now, this pitch was -- it was a little over two months after the first. Let's take a look at the first paragraph of your second communication to the IADB.

12

13

14

03:01:26

15

Here, you say that INAGROSA is looking to borrow \$5 million, correct?

16

17

A. Yes.

18

Q. And it's looking to borrow those \$5 million to plant 280,000 avocado trees on 700 hectares of land, right?

19

03:01:43

20

21

A. Yes.

22

Q. And so we would agree that that is less money and more trees on more land --

23

24

A. Yes.

03:01:50

25

Q. -- two months later.

03:01:56 1 Now, Mr. Welty, the Inter-American
2 Development Bank did not invest in INAGROSA, did it?

3 A. No, it did not.

4 Q. You sent out a pitch to an entity called the
03:02:10 5 Invictus Initiative in December of 2016. Do you
6 remember that?

7 A. Yes, to Michael Kmita.

8 Q. What is the Invictus Initiative, Mr. Welty?

9 A. Well, this was sent to Michael Kmita at his
03:02:28 10 location at Invictus. Invictus was -- I'm not really
11 sure on the exact work that they did -- but Invictus was
12 not an investor but Michael Kmita was.

13 Q. Tell me who Michael Kmita was then.

14 A. He was a contact that had been given from
03:02:47 15 Carlos Rondón.

16 Q. And did either Mr. Kmita or the Invictus
17 initiative invest in INAGROSA?

18 A. No, they did not.

19 PRESIDENT: I'm sorry. We have been going
03:03:02 20 on for a couple of hours with a very short break. So we
21 can break any time in the next 10 or 15 minutes when
22 it's convenient.

23 MR. RAMOS-MROSOVSKY: It would be
24 perfectly convenient now, Mr. President.

03:03:16 25 PRESIDENT: Let's break now for 15 minutes

03:03:18 1 until 20 past 3. Mr. Welty, I'd ask you not to speak
2 with anybody about your testimony during the break.
3 Otherwise, you are free to go and take a cup of coffee.
4 But you cannot speak about your testimony.

03:04:25 5 *(Brief Recess)*
6 PRESIDENT: Okay. We go on.
7 Mr. Ramos-Mrosofsky.

8 MR. RAMOS-MROSOFSKY: Yes, thank you,
9 Mr. President.

03:23:01 10 We were just looking at -- I think we had
11 discussed the pitch to the Invictus -- the gentleman at
12 the Invictus Initiative. If there's no objection, I'm
13 going to ask Mr. Ricky to leave the chart from
14 Mr. Welty's witness statement up on the screen just as a
03:23:20 15 sort of map for us.
16 BY MR. RAMOS-MROSOFSKY:
17 Q. Mr. Welty, do you recall sending a pitch to the
18 Amherst College Endowment Fund?
19 A. Yes, I do.

03:23:35 20 Q. And that would have been in January of 2017,
21 correct?
22 A. Yes.

23 Q. Why Amherst, Mr. Welty? It's the only
24 university on this list.

03:23:47 25 A. Carlos had visited his daughter, who was

03:23:50 1 attending the college, and on that visit he met with her
2 and explained to her what she -- what he was doing in
3 Nicaragua.

4 She was I think very interested in the
03:24:09 5 project because it covered many different things and I
6 believe she asked Carlos to send her some more
7 information on it and that's how it got sent to her.

8 Q. I take it, then, that's the only university
9 endowment you pitched the INAGROSA investment to? It's
03:24:35 10 the only one on the list.

11 A. I believe so, yeah.

12 Q. And Amherst ultimately didn't invest in
13 INAGROSA, did it?

14 A. No, it did not.

03:24:44 15 Q. And on June 26th, 2017, I see that you sent a
16 pitch for INAGROSA to a firm called -- I'll try to
17 pronounce this -- Aether Investment Partners?

18 A. Yes.

19 Q. Can you tell me what Aether Investment is?

03:25:05 20 A. It was an investment company that I had been
21 introduced to through a friend who was also in the
22 investment business. And they invested in several
23 different industries, I believe, but I think they did
24 some work in the commodity, agricultural type
03:25:34 25 businesses. That was one of their areas of focus.

03:25:42 1 Q. Would it be fair to say, Mr. Welty, that your
2 thinking at the time was that Aether's investment focus
3 might make them particularly interested in the INAGROSA
4 project?

03:25:53 5 A. Yes. In fact, that's why it was referred to me
6 through the friend who said these guys might be a
7 potential investor, based on what he knew at that time.

8 Q. Let's take a look at the Aether pitch.

9 MR. RAMOS-MROSOVSKY: I believe it's
03:26:05 10 C-416, Ricky, if you can put it up. Let's just wait for
11 it to be on the screen. There it is.

12 Q. This is the pitch you sent to Aether,
13 Mr. Welty?

14 A. 416 --

03:26:21 15 MR. RAMOS-MROSOVSKY: Maybe we can go
16 through the pages so Mr. Welty can see the whole
17 document. Let's go to the next page so that he can see
18 to the end.

19 A. Okay.

03:26:32 20 Q. Thank you. Let's go back to the first page.

21 And I understand in this pitch you tell
22 Aether Investments that you are looking to raise 5 to
23 7 million to accelerate the development of 490,000 Hass
24 avocado trees on 700 hectares of land in Santa Fé,

03:26:57 25 Jinotega?

03:26:58

1 A. Yes.

2 Q. Now, I notice here that it says "Rio Verde Hass
3 Avocado S.A., a Nicaraguan corporation." Was that
4 corporation actually incorporated?

03:27:10

5 A. No, it was not.

6 Q. You were planning to incorporate it, correct?

7 A. Yes.

8 Q. As a vehicle for accepting investments into
9 INAGROSA?

03:27:19

10 A. Correct.

11 Q. Now, if we can turn to -- sorry, I'm just
12 trying to find my place, Mr. Welty. Do bear with me.

13 MR. RAMOS-MROSOVSKY: Page 2. Let's go to
14 page 2, Ricky.

03:27:43

15 Q. You advised Aether Investments as part of this
16 pitch that INAGROSA, or Rio Verde, would need to upgrade
17 its electricity supply. Is that correct?

18 A. Yes.

19 Q. And that that would cost about \$240,000?

03:27:56

20 A. Yes.

21 Q. You also say INAGROSA will need to install a
22 drip system for \$1.4 million. Is that right?

23 A. Yes.

24 Q. And you mention that you will need 10 to

03:28:15

25 12 million to build a processing plant, right?

03:28:18 1 A. Where is that located?

2 Q. Let's find it. I think it's on page 3. That's
3 why you don't see it. It's on page 3.

4 MR. RAMOS-MROSOVSKY: Let's go to page 3
03:28:28 5 so Mr. Welty can confirm he sees it. There we go.

6 Q. Let's just tidy up the record, Mr. Welty. You
7 were also asking for -- you were projecting that you
8 would need 10 to 12 million to build a processing plant,
9 correct?

03:28:48 10 A. Yes, that's the number that we have in that.

11 Q. And that processing plant would be built in the
12 City of Jinotega?

13 A. That's what that says, yes.

14 Q. Now, at this time -- let's go back to page 2.
03:29:08 15 At this time there were 16,000 trees
16 planted at Hacienda Santa Fé. Is that correct?

17 A. That's what we state in this business plan,
18 yes.

19 Q. Avocado trees, obviously?

03:29:19 20 A. Yes.

21 Q. And those had begun being planted in -- well,
22 here it says 2015. Is that right?

23 A. That's what it says. However, I would -- that
24 number --

03:29:35 25 Q. Should it be 2014, in your view?

03:29:37 1 A. It probably should be 2014.

2 Q. Now, you sent this pitch in June of 2017,
3 correct?

4 A. Is it 2017 or 2016?

03:29:44 5 Q. Let's just look at the -- let's just look at
6 the chart.

7 MR. RAMOS-MROSOVSKY: Ricky, can you take
8 the pull-out down so we can see the list? Yes.

9 Q. So Aether Investments, 2017.

03:29:57 10 A. Oh, okay. Yes, that's when it was sent.

11 Q. And so we could infer, then, that from 2014,
12 like you said, through 2017, INAGROSA planted 16,000
13 avocado trees?

14 A. That's what it says, yes.

03:30:19 15 Q. If we go to page 2 -- there's a lot of
16 pullouts, and I apologize for that. Too much
17 technology.

18 You're projecting that INAGROSA can plant
19 between 490,000 to 560,000 trees within a year, correct?

03:30:40 20 I think the sentence begins:

21 "For conservative financial modeling
22 purposes, we are using 490,000 total trees..."

23 A. Okay.

24 Q. Is that correct, Mr. Welty, that's what you
03:30:55 25 told them?

03:30:56 1 A. That's what we wrote there, yes.

2 Q. Did Aether invest in INAGROSA?

3 A. No.

4 MR. RAMOS-MROSOVSKY: Let's take the
03:31:01 5 Aether documents down and leave up the list.

6 Q. In June of 2017, a few days later, it looks
7 like, you also sent the INAGROSA pitch to a gentleman
8 named Fred Duboc. Is that correct?

9 A. Yes.

03:31:19 10 Q. Who is Fred Duboc, Mr. Welty?

11 A. He was a person that I had worked with earlier
12 in my career, a very successful gentleman, one of the
13 managing partners of a firm I was involved with. A very
14 high net worth individual.

03:31:34 15 Q. And did Mr. Duboc invest in INAGROSA?

16 A. He was very interested in the project, but at
17 that point he was -- which I was unaware of when I sent
18 him that -- he was only investing in securities that had
19 immediate income. So he was looking more for immediate,
03:31:54 20 consistent income rather than something that did not
21 provide that.

22 Q. So he didn't invest in INAGROSA?

23 A. Yes.

24 Q. Now, I see that you then sent the INAGROSA
03:32:06 25 pitch to a gentleman named Francisco Del Valle in

03:32:12 1 September of 2017. Is that correct?

2 A. Yes.

3 Q. Who is Mr. Del Valle?

4 A. We refer to him as Paco. He was a gentleman
03:32:23 5 that we visited in Uruapan, Michoacan when we were at
6 the Latin American Avocado Congress. We took a side
7 trip to visit the heart of the avocado growing region.
8 Paco was an avocado farmer. He had had a farm for many
9 years. He was an adjunct professor, and earlier in his
03:32:52 10 career he was vice president of a major bank in Mexico
11 City.

12 Q. So Mr. Del Valle was an avocado grower and an
13 investor?

14 A. Yes.

03:33:05 15 Q. So this gentleman obviously had significant
16 experience in the industry, correct?

17 A. Yes.

18 Q. And he did not invest in INAGROSA, did he?

19 A. He did not.

03:33:17 20 Q. Now, you attended -- we covered this -- it
21 wasn't the World Avocado Congress, it was the Latin
22 American Avocado Congress in 2017 in September. I'm
23 just mentioning that so we can keep the chronology
24 straight in our heads.

03:33:30 25 After that, in November of 2017, you sent

03:33:34 1 a pitch out to -- forgive me, Mr. Welty, I know you made
2 a correction here. What was it called? It wasn't MDB.
3 It was --

4 A. It was GVC Capital.

03:33:49 5 Q. GVC. I'm sorry, my notes say MDB, so please be
6 patient with me. So you sent a pitch to GVC Capital in
7 November of 2017, correct?

8 A. Correct.

9 Q. And who are they?

03:33:57 10 A. GVC Capital was an investment banking firm and
11 Mike Donnelly was one of their senior people and we had
12 sent him the business plan because he was interested in
13 it. And we were looking at raising capital, and he
14 offered to help us with introductions.

03:34:22 15 Q. But he didn't invest?

16 A. Well, he was never going to be an investor, but
17 he was hopefully going to introduce us to investors.

18 Q. I'm sorry, Mr. Welty. I think I understand
19 you, but I want to be clear for everything being
03:34:37 20 transcribed. I should have asked you a better question.

21 I didn't mean Mr. Donnelly personally. I
22 meant GVC Capital did not invest, correct?

23 A. Well, GVC was the firm that Mike Donnelly
24 worked for, and they were an investment banking firm.

03:34:58 25 Q. Right.

03:34:59 1 A. So it was a conduit to utilize their network of
2 people to find potential investors.

3 Q. So in a sense, you were hoping they would
4 recommend the investment to other business contacts that
03:35:13 5 they had?

6 A. Correct.

7 Q. And nothing came of that?

8 A. Well, not -- no. We -- there was a gentleman
9 that they had introduced us to, a guy named Christopher
03:35:30 10 Marlett, who was an investor, who had an affiliation
11 with Nicaragua.

12 Q. Okay. And Mr. Marlett doesn't appear in the
13 list in your witness statement, does he?

14 A. No.

03:35:47 15 Q. And did Mr. Marlett ultimately make an
16 investment in INAGROSA?

17 A. Mr. Marlett -- actually we had an ongoing
18 discussion with him for many months. He actually
19 visited the farm in 2018, and he had not made any
03:36:08 20 decision up to that point until we had the invasion in
21 2018.

22 Q. And you didn't include that in your witness
23 statement, Mr. Welty?

24 A. It was an oversight on my part.

03:36:25 25 Q. Well, let's focus on what's in your witness

03:36:27 1 statement for now.

2 A. Okay.

3 Q. I see that, in October of 2017, you sent the
4 INAGROSA pitch to Edgard Cuadra. Who's Edgard Cuadra?

03:36:47 5 A. He was a person that Carlos Rondón knew in
6 Nicaragua, and he had requested that I send him a copy
7 of it because he had -- Carlos had mentioned to him
8 about the project and he was very -- he was interested
9 in it.

03:37:00 10 Q. Was he another -- I think the phrase you used
11 was a high worth individual who had money to invest?

12 A. I believe he was. I did not know him, and I
13 wasn't involved in any communications with him. That
14 was handled through Carlos.

03:37:14 15 Q. But ultimately Mr. Cuadra did not invest in
16 INAGROSA, did he?

17 A. Correct.

18 Q. I'm just working down this list. I'm sorry
19 it's a little bit tedious, Mr. Welty. What about

03:37:28 20 Margaret Scaddon? Who was that?

21 A. That was another one of Carlos' contacts I
22 forwarded a copy of the business plan.

23 Q. Was that somebody in Nicaragua or in the United
24 States or elsewhere?

03:37:40 25 A. I don't believe it was in the United States,

03:37:41 1 but I'm not sure exactly where she lived.

2 Q. Fair enough. But Ms. Scaddon didn't invest in
3 INAGROSA, did she?

4 A. No.

03:37:48 5 Q. And what about Thomas Wolf, Mr. Welty?

6 A. Thomas Wolf was another high net worth
7 individual that I had known for 15, 20 years, and in a
8 discussion I had with him he was interested in learning
9 more about the project.

03:38:03 10 Q. But he didn't invest in INAGROSA, did he?

11 A. No, he did not.

12 Q. Now, I see that in February of 2018, you sent
13 the INAGROSA pitch to the overseas private investment
14 corporation, right?

03:38:16 15 A. Yes.

16 Q. And that's a US government entity, isn't it?

17 A. Yes.

18 Q. Did OPIC invest in INAGROSA?

19 A. No.

03:38:28 20 Q. And then I see in March of 2018, you sent the
21 INAGROSA pitch to Merrill Lynch? Is that right?

22 A. Yes.

23 Q. And they didn't invest either, did they?

24 A. No.

03:38:39 25 Q. Now, the last pitch you sent, in May of 2018,

03:38:42 1 was to a firm called Glidepath Partners?

2 A. Yes.

3 Q. Can you tell me a little bit about Glidepath
4 Partners?

03:38:51 5 A. Yeah, Glidepath Partners was an investment firm
6 run by a friend of mine named Mark Soane. Mark and I
7 have been long-time friends. We play tennis together.

8 He has had a very successful career,

9 Stanford MBA, he's worked for several venture capital
03:39:17 10 type firms, and he had a lot of experience. And I had
11 talked to him over the last year or two associated --
12 you know, about the plan. So when we kind of

13 reconnected during the summer, he was asking me how the
14 project was going and he wanted to learn more about it.

03:39:33 15 And he said, "Well, if you need help" -- I
16 said, "Well, we don't need help right now", because we
17 had had the commitment from Riverside for the

18 \$16 million. I sent him over a business plan and, as
19 anything, if you want somebody to review it, it's always

03:39:52 20 good to get added information. So I sent it to him and
21 he returned it talking about that he thought it was well

22 written. It answered all of his questions surrounding
23 the opportunity and that basically if we needed to

24 pursue funding in the future, that he knew some people

03:40:09 25 that we could talk to.

03:40:13 1 Q. So would it be fair to say as this is -- first,
2 to be clear, he didn't actually make an investment in
3 INAGROSA at the time, did he?

4 A. No, he did not.

03:40:21 5 Q. And this is the last pitch listed here. You
6 told me earlier that you had iteratively revised the
7 pitch. Would it be fair to say this was the most
8 developed version of the INAGROSA pitch that you sent
9 out?

03:40:37 10 A. Actually the best explanation would be is that
11 the second version that I sent to OPIC, 0414, was the
12 best version and when I sent that version to Mark Soane,
13 it was actually the identical file.

14 Q. So when we are looking --

03:41:04 15 A. I apologize --

16 Q. Those two files, they're the same. I
17 apologize, we spoke over each other. It's my fault, not
18 yours, Mr. Welty.

03:41:14 19 Let's take a look at the Glidepath, and I
20 appreciate you're clarifying it's the same as the OPIC
21 file, but I'm going to pull up the Glidepath one or else
22 I'm going to confuse poor Mr. Ricky.

23 MR. RAMOS-MROSOVSKY: This is C-404.

03:41:37 24 Let's just flip through the pages so Mr. Welty can see
25 each of them. Let's go to the last page.

03:41:47 1 Q. Mr. Welty, have you had a chance to make sure
2 this is the correct document that we're talking about?

3 A. Yes, it looks like it's the correct one.

4 Q. Now, in this pitch, you advised that Rio Verde,
03:42:04 5 INAGROSA effectively, was looking for a \$10 million
6 investment, correct?

7 A. Correct.

8 Q. And that would accelerate the development of
9 600,000 avocado trees on 700 hectares, right?

03:42:21 10 A. Correct.

11 Q. And you projected revenue of well over
12 60 million, correct?

13 A. Yes.

14 Q. And you projected operating margins above
03:42:35 15 85 percent?

16 A. Yes.

17 Q. Now, is it your view, Mr. Welty, that that
18 would be a typical margin for the avocado industry?

19 A. Well, I calculated that number. I mean, it's
03:42:50 20 pretty basic math of looking at the costs and the
21 revenue that I -- you know, the input. And those are
22 the numbers that I came up with.

23 And if you look at it from the standpoint
24 of what we were doing at this problem, it was a number
03:43:11 25 that I was comfortable with. However, it's -- to answer

03:43:14 1 your question specifically is that is not, shall we say,
2 typical.

3 Q. And I think -- I appreciate your answer,
4 Mr. Welty, and I take it you're telling me it's not
03:43:26 5 typical because typical margins are considerably lower
6 in the avocado industry, correct?

7 A. Well, it depends on what you're looking at. I
8 would -- it depends on the structure of what the
9 business is and -- there -- well -- yeah -- it's -- I
03:44:08 10 don't know, it's not typical in the sense of a
11 pure avocado -- I mean from a pure avocado growing
12 operation. And I can explain to you how we get to those
13 numbers.

14 Q. I just -- Mr. Welty, as I said -- and I
03:44:25 15 appreciate your answer -- I'm sure Mr. Appleton will
16 have questions for you, and I am mindful of time, so I
17 don't mean to cut you off. I want to get through my
18 questions and I'm sure -- I'm sure my friend will bring
19 you back.

03:44:41 20 A. Okay.

21 Q. Now, if we get to the second page of this
22 document, it says that Mr. Rondón attended the World
23 Avocado Congress, is that right, in 2015? I believe
24 it's the top of the page.

03:44:56 25 A. Yes, in Peru. I see that.

03:44:58 1 Q. In Peru. So that's the -- so to speak, the
2 real World Avocado Congress, isn't it, as opposed to the
3 Latin American one?

4 A. Yeah, the World Avocado Congress would happen
03:45:10 5 every so -- every several years, and opposite that you
6 would get the Latin American Congress interspersed in
7 between.

8 Q. In the gap years?

9 A. Yes. They kind of alternated.

03:45:19 10 Q. And this pitch says that Mr. Rondón attended
11 the World Avocado Congress in Peru and, as a result,
12 decided to move forward with converting the coffee farm
13 to avocado, right?

14 A. Yes.

03:45:40 15 Q. I recall in your witness statement you said the
16 transition from coffee to Hass avocado cultivation began
17 in 2014. I can take you there if you want. It should
18 be paragraph 18. We can pull it up, or you can have a
19 look if it would be helpful.

03:45:55 20 A. No, I remember that.

21 Q. So would it be fair to say that Mr. Rondón was
22 considering avocado among other lines of business in
23 2014 and this document is correct, or is it the other
24 way around?

03:46:12 25 A. I would believe that's -- this is probably a

03:46:20 1 not completely accurate statement of what transpired
2 during that time frame.

3 MR. APPLETON: Excuse me. I have to
4 object. I've been watching very carefully and giving
03:46:28 5 you a lot of leeway, but you've asked the witness to
6 comment on what Mr. Rondón's thinking is. You've had
7 Mr. Rondón here. You had the opportunity to ask him
8 what his thinking was.

9 I think wouldn't the question be do you
03:46:41 10 know what his thinking is and then, if so, you could
11 ask. Otherwise, if you're asking him to speculate or to
12 be able to engage in telepathic evidence, I find that
13 objectionable and beyond his capability as far as I'm
14 aware. So --

03:47:00 15 MR. RAMOS-MROSOVSKY: Mr. President, if I
16 may, the witness wrote both documents, and they don't
17 match and I'm simply asking the witness to clarify what
18 he meant. And I think the witness answered completely
19 honestly. I'm perfectly happy with his answer.

03:47:13 20 MR. APPLETON: Then you can pose that
21 question, but you can't ask him somebody else's
22 thinking.

23 MR. RAMOS-MROSOVSKY: The witness
24 testified that he spoke -- forgive me, Mr. President.

03:47:22 25 PRESIDENT: He was not asking about

03:47:23 1 thinking. He was asking about what Mr. Rondón was
2 considering. They were working together. It's a
3 perfectly legitimate question. Please go on.

4 MR. RAMOS-MROSOVSKY: Thank you,
03:47:32 5 Mr. President.

6 Q. So, Mr. Welty, I'm sorry. In 2014 -- I'm
7 sorry, I've lost my place.

8 We were talking about how Mr. Rondón may
9 have been considering various lines of business. Let me
03:47:43 10 ask you this. Were you ever asked to advise on an
11 ecotourism business at INAGROSA?

12 A. No.

13 Q. What about ferns? Did you ever give any advice
14 on ferns?

03:47:55 15 A. No advice on ferns.

16 Q. Are you familiar with what I'm talking about at
17 all?

18 A. I'm familiar with the -- yeah, the leather --
19 the fern opportunity that he had several years before.

03:48:07 20 Q. Okay. I just wanted to clarify the scope of
21 your testimony while we're on the subject.

22 A. But I did not advise on it.

23 Q. Now, if we go to page 4 -- I apologize for
24 jumping around because I'm thinking more by subjects
03:48:25 25 than page order, which I apologize for. But on page 4,

03:48:29 1 this document says that there were three or -- where are
2 we? I'm sorry, I've lost my spot. I'm going to -- yes.

3 Second paragraph. Forgive me.

03:48:56 4 According to this document, which is the
5 Glidepath OPIC pitch, there were 3 million coffee plants
6 on 700 hectares at its peak. Is that right?

7 A. That's what the document says, yes.

8 Q. And would you have gotten that information from
9 Mr. Rondón?

03:49:09 10 A. Yes.

11 Q. Now, at the bottom of the page, you talk about
12 project sector and target market, correct?

13 A. Yes.

14 Q. And you have a discussion of US demand, right?

03:49:28 15 A. Yeah.

16 Q. In fact, you say that US per capita avocado
17 consumption has doubled to 7 pounds per person in the
18 last 10 years?

19 A. Correct.

03:49:40 20 Q. Now, you understood, though, that exporting
21 Nicaraguan avocados to the United States would require
22 various regulatory approvals, correct?

23 A. Yes, I was aware of that.

03:49:59 24 Q. Now, if we go to page 6 of the Glidepath/OPIC,
25 I know you said they were the same. So if we go to

03:50:02 1 page 6, do you see a second paragraph with the header
2 "Legal/economic/political environment and government
3 participation?"

4 A. Yes.

03:50:17 5 Q. And in this pitch, which you sent to OPIC and
6 Glidepath, you said that, "We believe the legal,
7 economic and political environments are very supportive
8 of our business plan."

9 Do you see that?

03:50:34 10 A. Yes, I see that.

11 Q. And you would have sent this in May of 2018,
12 correct?

13 A. Yes. I had written it previous to that, in the
14 February time frame.

03:50:52 15 Q. But we could agree this was weeks before the
16 incursion at Hacienda Santa Fé in June, correct?

17 A. Yes.

18 Q. And if we turn to page -- the next -- is it on
19 the next page? No, sorry. Let's go back. You also
03:51:16 20 stated, I believe, that "INAGROSA had great
21 relationships with the local population and businesses,
22 local and national civic leaders and organizations."

23 Do you remember saying that? Is that what
24 you wrote?

03:51:31 25 A. That's what I wrote, yes.

03:51:34 1 Q. Now, Mr. Welty, were you aware, when you wrote
2 this, of the longstanding dispute between the Rondón
3 family and the El Pavón cooperative?

4 A. I was not.

03:51:48 5 Q. Now let's turn to page 7. You see a discussion
6 here in the final paragraph of political risk?

7 A. Yes.

8 Q. Would you be kind enough to just read that
9 paragraph for us?

03:52:01 10 A. "Other risks would be associated with political
11 risk. We do not believe this is a risk that should be
12 of concern as we have operated a high quality,
13 successful coffee plantation for about 20 years and have
14 had no issues with operating within the political/legal
03:52:19 15 framework of Nicaragua. Recent discussions with
16 political entities have shown a great deal of interest
17 and support for our project ."

18 Q. Did you get that information from Mr. Rondón?

19 A. Some of it, and some of it was my experience
03:52:40 20 when I was in Nicaragua.

21 Q. And when you were an investment analyst, you
22 would have understood the importance of the degree of
23 political risk for any foreign investment, wouldn't you?

24 A. Yes. I clearly understated -- or understated
03:52:56 25 the political risk based on what happened a month later.

03:53:00 1 Q. What you wrote here was based on the best
2 information you had, wasn't it?

3 A. Well, it was information that I had that -- it
4 was information -- or it was experience meeting with
03:53:12 5 PRONicaragua, a meeting with the avocado growers co-op,
6 the association that INAGROSA had with the local Chamber
7 of Commerce, and we had from all of those discussions,
8 there was a very strong degree of interest in our
9 project and support.

03:53:35 10 Q. I want to just jump back, forgive me, briefly
11 to the OPIC presentation, since you said they were
12 identical and pointed that out.

13 Let's look at the first of those. This
14 will be the one you sent in February of 2018 --
03:53:50 15 February 5th. Forgive me, they're both in February.
16 February 5, 2018.

17 I believe it's C-655, Ricky, if you can
18 pull that up. I take this down, this is the wrong
19 document. Take this down. It's a confidential document
03:54:23 20 that was supposed to be the proposal. I don't want the
21 email, I want the proposal, the pitch. I'm sorry,
22 Mr. President, we have the wrong exhibit number. I
23 don't want to leave anything confidential up.

24 MR. APPLETON: Do you want us to go to a
03:54:38 25 protected --

03:54:39 1 MR. RAMOS-MROSOVSKY: No, there's no need.
2 MR. APPLETON: We don't want this to
3 happen again. This is a live transmitted session, so we
4 really want to be exceptionally careful about protecting
03:54:50 5 the information.
6 PRESIDENT: That is noted.
7 MR. RAMOS-MROSOVSKY: It's C-418. I do
8 apologize.
9 PRESIDENT: Can you repeat the number,
03:54:57 10 please?
11 MR. RAMOS-MROSOVSKY: C-418.
12 Q. And in this -- this is the first document you
13 sent to OPIC, isn't it, Mr. Welty?
14 MR. RAMOS-MROSOVSKY: Ricky, can we go
03:55:10 15 through C-418 just so Mr. Welty can see all the pages.
16 I think it's these three pages. Let's go up to the top
17 again.
18 Q. Is this the first pitch you sent to OPIC,
19 Mr. Welty?
03:55:26 20 A. I believe so.
21 Q. And we can see in the top paragraph that
22 Rio Verde INAGROSA is looking to raise \$7 million to
23 develop 500,000 avocado trees on 700 hectares, correct?
24 A. Correct.
03:55:54 25 Q. And you're projecting 25 million kilograms of

03:55:56 1 avocados. Now, I want to be sure we have the right
2 exhibit number for the second before we put anything up.
3 Yes, 414. Let's look at C-414. Can we maybe have the
4 chart up on the left so it's a little easier to follow,
03:56:09 5 because there are a lot of these pitches, we keep
6 switching between them.

7 All right. C-414. This should be the
8 second pitch you made to OPIC, correct, Mr. Welty?
9 Let's get it up.

03:56:32 10 A. Correct.

11 Q. Here it is, C-414.

12 And you're asking now for \$10 million to
13 develop 600,000 Hass avocado trees, correct?

14 A. Yeah, that 600,000 number should be 500,000, I
03:56:49 15 believe. I was looking at these -- I don't know where
16 that 600 came from, but --

17 Q. So that's a typo?

18 A. I believe that's a typo, yes.

19 Q. Okay. But the ask certainly went up, didn't
03:57:05 20 it?

21 A. Yes, and that was at the request of OPIC when
22 we sent them the first business plan. They told us that
23 they had a \$10 million minimum for their investment, and
24 they requested that we increase our ask from the
03:57:21 25 7 million to 10 million.

03:57:23 1 Q. But they didn't invest, did they?

2 A. No, they did not.

3 Q. Now, all of these plans -- we can take down the
4 specific pitch -- let's leave up the chart for now.

03:57:39 5 It's convenient.

6 All of these plans, Mr. Welty, were for
7 what was fundamentally an export-based business, right?

8 A. Yes.

9 Q. And I think we agreed, but to confirm, you were
03:57:51 10 aware that INAGROSA would face various regulatory
11 requirements to carry out that proposed export project,
12 right?

13 A. Yes, various countries have various procedures
14 for importing or exporting.

03:58:06 15 Q. And did you understand at the time, Mr. Welty,
16 that INAGROSA would also need export licensing from
17 Nicaragua?

18 A. To get the fruit out of Nicaragua --

19 Q. Yes.

03:58:19 20 A. -- yeah, you'd have to get the certificate to
21 export out of Nicaragua, yes.

22 Q. I appreciate that -- correct me if I'm wrong --
23 INAGROSA historically had an export permit for coffee.
24 Is that right?

03:58:33 25 A. Yes, it did.

03:58:34 1 Q. But it didn't have an export permit for
2 avocados, did it?

3 A. At that time, no.

4 Q. Did it at any time have an export permit for
03:58:43 5 avocados, Mr. Welty?

6 A. Not at that -- but that was going to be a piece
7 of the puzzle that we would put together when we needed
8 to.

9 Q. When you needed to, but you didn't have it, did
03:58:56 10 you?

11 A. No.

12 Q. Now, that's for leaving Nicaragua. There were
13 also regulatory requirements to enter the foreign
14 market, aren't there?

03:59:04 15 A. Yeah, various countries have various regulatory
16 requirements.

17 Q. Now, the United States was the primary foreign
18 target market you were thinking about, isn't it?

19 A. Well, we were targeting the entire world. We
03:59:16 20 would go to the markets that would provide the best
21 return, and the United States has typically been one of
22 the higher import markets. It's the largest import
23 market in the world.

24 Q. The largest import market in the world --

03:59:31 25 A. For avocado.

03:59:32 1 Q. For avocados. I know you mentioned Europe and
2 Asia previously, but the United States is a lot closer,
3 isn't it?

4 A. Yes, US and Canada.

03:59:42 5 Q. A lot more avocado -- a lot more people to eat
6 avocados in the United States, right, Mr. Welty?

7 A. It's the largest market, yes.

8 Q. So are you familiar with an insect by the name
9 of ceratitis capitata, Mr. Welty?

03:59:58 10 A. I believe that's the Med fly, if I'm not
11 mistaken.

12 Q. The Med fly, exactly. You know about this fly,
13 don't you?

14 A. Yes, I do.

04:00:04 15 Q. And this is a serious pest that infests fruit
16 in Nicaragua, isn't it?

17 A. It infests fruit in Nicaragua and several
18 countries in the area.

19 Q. You were also aware, then, that exporting
04:00:22 20 Nicaraguan avocados to the United States would require
21 the US Department of Agriculture to permit their entry
22 into the United States, right?

23 A. To -- yes, you would need approval from --
24 through the APHIS system under the USDA, as well as in
04:00:43 25 the United States it would be required to change the

04:00:50 1 regulation to Hass avocados from Nicaragua to come into
2 the market.

3 Q. You'd have to change the regulation because at
4 the time, and to this day, Nicaraguan avocados are
04:01:00 5 banned in the United States, aren't they?

6 A. Yes, they are under the regulation, yes.

7 Q. Because of the Med fly, right?

8 A. Because of the Med fly.

9 Q. And Mr. Rondón -- would it surprise you,
04:01:14 10 Mr. Welty, if Mr. Rondón had described you as the point
11 person on export authorization to the United States?

12 A. Yes -- I mean, no, it would not surprise me.
13 I'm sorry. I was the point person on that, yes. Well,
14 we were working together, but it was my activity.

04:01:36 15 Q. Do you recall having communications with the
16 office of the United States senator from Colorado? I
17 believe it was Senator Bennet on this issue?

18 A. Yes, I do. I initiated that.

19 Q. And you reached out to Senator Bennet
04:01:51 20 presumably because you were based in Colorado when not
21 in Nicaragua? The company, forgive me.

22 A. Well, actually I'd known Senator Bennet and he
23 was the chief of staff of Senator -- our current
24 Senator, John Hickenlooper, and John Hickenlooper and I
04:02:09 25 were very good friends and so we spoke and he -- so yes,

04:02:14 1 I know them.

2 Q. And Laura Sherman would have been Senator
3 Bennet's agricultural aide. Is that fair?

4 A. I'm not sure if she was specifically
04:02:26 5 agricultural but she was a key person within his --
6 within his office.

7 Q. She was, at any rate, the person you dealt with
8 directly on this -- on this licensing issue?

9 A. Yes.

04:02:38 10 Q. Let's look at an email. The file is C-466. If
11 we can pop that up. Do you recognize this
12 correspondence, Mr. Welty?

13 MR. RAMOS-MROSOVSKY: Let's just scroll
14 through it so he can see the whole document.

04:03:03 15 A. Yeah.

16 Q. This is your email exchange with Laura Bennet
17 at Senator -- excuse me. With Laura Sherman at Senator
18 Bennet's office?

19 A. Yes, it is.

04:03:12 20 Q. It's an email, so we'll start from the bottom
21 on page 2.

22 You wrote to Ms. Sherman on September 22,
23 2016, right?

24 A. Yes, I did.

04:03:25 25 Q. And you told her that as a result of the impact

04:03:29 1 of a changing climate, Mr. Rondón was transitioning his
2 farm from coffee to Hass avocados, correct?

3 A. Yes.

4 Q. You didn't mention the Roya fungus here?

04:03:41 5 A. No, I did not.

6 Q. And I see that you also asked in this paragraph
7 whether the USDA -- the United States Department of
8 Agriculture, for the record -- might have programs that
9 could help with financing the drip irrigation system for
10 the avocado trees, right?

11 A. Yes.

12 Q. Did you ever -- just by-the-by -- did you ever
13 receive any financing from the US Department of
14 Agriculture?

04:04:11 15 A. No.

16 Q. For the irrigation system?

17 I'm sorry, we spoke over each other. It's
18 my fault. Did you ever receive any USDA financing?

19 A. No, I did not -- no, we did not.

04:04:23 20 Q. If we go up the email chain, there's an email
21 from October 18, 2016. Do you see that email?

22 A. Yes.

23 Q. We're still in C-0466. There's just multiple
24 emails in the document.

04:04:38 25 This is Ms. Sherman's response to you and

04:04:40 1 Carlos Rondón, correct?

2 A. Yes.

3 Q. And she told you that you would need to get
4 import authorization from APHIS because of the ban that
04:04:58 5 we've discussed, right?

6 A. Correct.

7 Q. She also told you in her email that INAGROSA
8 couldn't directly request that authorization, right?

9 A. That's what this statement says, yes.

04:05:09 10 Q. She said this was a government -- she
11 characterized this as a government-to-government matter,
12 right?

13 A. Where would --

14 Q. Let's go -- you see there's a -- there's her
04:05:23 15 signature and then there's a message she's forwarding
16 from the -- from FSA.

17 A. Okay.

18 Q. And do you see it says, "According to APHIS,
19 the Nicaraguan industry would need to go to the
04:05:39 20 Nicaraguan National Plant Protection Organization and
21 the NPPO would need to request access to the US market."

22 Do you see that?

23 A. Yes.

24 Q. The NPPO, Mr. Welty, are you aware that that
04:05:52 25 would be a regulatory body in Nicaragua?

04:05:55 1 A. I believe that's your IPSA body.

2 Q. Yes, IPSA, exactly. So we're on the same page.
3 So she told you that the Nicaraguan --

4 MR. APPLETON: I'm sorry. I just want to
04:06:06 5 make sure when I read the transcript, you said that this
6 was a government-to-government entity. Just to confirm,
7 you've just said here that it's the industry, and I just
8 want to give you the opportunity to clarify the matter
9 because that's not exactly what it says, so you've
04:06:22 10 mischaracterized it. But I'm sure it was inadvertent,
11 so I'd like to give you the opportunity to clean up the
12 misstatements of the record.

13 MR. RAMOS-MROSOVSKY: I don't have a
14 mistake to clean up, Mr. Appleton. Thank you for the
04:06:33 15 opportunity.

16 MR. APPLETON: You say the Nicaraguan
17 industry is government-to-government?

18 MR. RAMOS-MROSOVSKY: Mr. Appleton, you
19 have a redirect exam. You may use that opportunity as
04:06:43 20 best you wish.

21 MR. APPLETON: No problem. We'll go
22 there.

23 PRESIDENT: Go on.

24 MR. RAMOS-MROSOVSKY: Thank you,
04:06:46 25 Mr. President.

04:06:47 1 Q. Mr. Welty, do you see here in this email that
2 Ms. Sherman is forwarding a communication from the
3 USDA's FSA, explaining that the Nicaraguan NPPO would
4 need to request access to the US market from APHIS?

04:07:07 5 A. I see that comment, yes.

6 Q. She also recommended, did she not, that you
7 meet with the USDA's attaché in Costa Rica, a
8 Mr. Hansen. Do you see that?

9 A. Yes.

04:07:25 10 Q. Now, there's no correspondence with the USDA
11 attaché attached to your witness statement, is there?

12 A. No, but we did have a telephone conversation.

13 Q. But you didn't attach anything in writing to
14 your witness statement?

04:07:40 15 A. No.

16 Q. You mentioned in your witness statement that
17 you had a government relations and PR budget to obtain
18 support in the United States, right?

19 A. Yes.

04:07:56 20 Q. Because you understood that admitting
21 Nicaraguan imports into the United States would have
22 required a regulation -- a regulatory change, right?

23 A. Yes, and we had a plan to address that.

24 Q. You would have been lobbying effectively for a
04:08:09 25 change in the regulation, right?

04:08:16 1 A. Yes, as a matter of fact, we had --

2 Q. I'm sorry, Mr. Welty. I'll ask you again so we
3 can get it clear.

4 You would have had to lobby for a
04:08:22 5 regulatory change, right?

6 A. Yes, we understood that to change a regulation
7 in the US -- in the United States like that, you would
8 need to lobby to get that regulation changed. And we
9 were in the process in that we had a relationship with a
04:08:41 10 lobbying firm in the United States, Squire Patton Boggs,
11 to proceed on that.

12 Q. So you didn't identify them in your witness
13 statement, did you?

14 A. I did not.

04:08:56 15 Q. I take it that -- you can correct me, but
16 Squire Patton Boggs would have approached regulators and
17 elected officials and made the case for why this
18 regulation should be changed, right?

19 A. Well, they're a lobbying firm so ...

04:09:11 20 Q. I'm just trying to understand, that's what you
21 would have been paying them to do, right?

22 A. And we had the support of our local Senate
23 office as well that would help in that lobbying process.

24 Q. It would be fair to say that you were at this
04:09:24 25 point -- and I don't mean any aspersion by this,

04:09:27 1 Mr. Welty -- you were lobbying Senator Bennet's office
2 in relation to a regulatory change you hoped would
3 happen?

4 A. Well, we -- yes, we -- that would need to be
04:09:39 5 done, and we had a plan and a budget to move forward on
6 that.

7 Q. The US government hasn't issued such a
8 regulation, has it -- or change in regulations, has it?

9 A. Well, we didn't pursue that because of the
04:09:53 10 confiscation -- or the June 17 events that happened.

11 Q. So the law remains what it was at the time,
12 that Nicaraguan avocados are banned, correct?

13 A. As far as I know, yes.

14 Q. And just so that we're clear, this document
04:10:09 15 here, this is the only correspondence that you've
16 attached with Ms. Sherman, correct?

17 A. This would have been the email chain with
18 Ms. Sherman, correct.

19 Q. And you mentioned some phone calls with the
04:10:24 20 attaché, the agricultural attaché. You don't mention
21 those in your witness statement, do you -- let's pause
22 for a second. Everything okay? I don't know what that
23 alarm is.

24 *(Discussion off the record)*

04:10:53 25 Q. I'm so sorry. Just to back up, Mr. Welty, you

04:10:56 1 don't mention those phone calls with Mr. Hansen in your
2 witness statement, do you?

3 A. I don't believe so.

4 Q. Do you include -- you don't include any
04:11:06 5 correspondence with IPSA either, do you?

6 A. In my witness statement I don't, no.

7 Q. I'd like to jump back very briefly to C-405.
8 This would have been the second pitch you sent to the
9 Inter-American Development Bank.

04:11:33 10 MR. RAMOS-MROSOVSKY: Ricky, can we pull
11 that up, we can take this down. You can leave this up.
12 Put up C-405.

13 Q. So this, Mr. Welty, is the second pitch to the
14 IADB, and that would have been sent in November of 2016.
04:11:51 15 Is that right? You can look at the list in your witness
16 statement if you want to confirm it.

17 A. November 19th, yes.

18 Q. So this pitch to the IADB was sent about a
19 month after the email communication with Ms. Sherman
04:12:07 20 about intergovernmental regulatory issues, right?

21 A. I think I -- well, I think if you look at the
22 email, we sent the email, her response was -- I want to
23 say it's November or October emails. I don't remember.

24 Q. If you look --

04:12:34 25 A. This email on the left says it's October 18.

04:12:36 1 Q. Yes. And if you look at the list in your
2 witness statement of pitches that you sent, C-405 is
3 dated November 19, 2016, correct?

4 A. Okay. That would be after.

04:12:51 5 Q. About a month after, right?

6 A. Okay.

7 Q. Now, in this document you talk about increasing
8 consumption of avocados in the United States, right?
9 For example, second and third paragraphs, right?

04:13:09 10 A. Are you referring here --

11 Q. Well, "California saw an 11 percent decline in
12 avocado-producing acreage."

13 "Consumption in the US is growing about
14 20 percent annually."

04:13:20 15 Do you see those?

16 A. Yes.

17 Q. But nowhere in this document did you advise the
18 Inter-American Development Bank that you would need to
19 lobby for a change in US federal regulations so that
04:13:34 20 INAGROSA's avocados could enter the United States,
21 right?

22 A. I would have to read through it, but I don't
23 recall it.

24 Q. Take a moment. It's a short document,
04:13:47 25 Mr. Welty.

04:14:00 1 A. Okay.

2 Q. So we can agree, I think, that we -- there's no
3 discussion of this regulatory ban in your pitch to the
4 IADB, right?

04:14:08 5 A. There is not.

6 Q. Now, if we turn to the Glidepath pitch from May
7 of 2018, 404. C-404. We've got that back up.

8 We see the language:

9 "During 2018 to 2019, the regulatory
04:14:36 10 approvals and logistical process will be qualified and
11 put into place. These tasks will include getting USDA
12 approval to allow the sale of Nicaragua Hass avocados
13 into the US."

14 You would have written that to Glidepath
04:14:58 15 and OPIC in May of 2018, correct?

16 A. Yes, that's when I would have sent it.

17 Q. And that's all you say about US regulatory
18 issues in this pitch, isn't it?

19 A. In this pitch, in this document, that's what
04:15:14 20 was said, yes. But we were involved in moving forward
21 that process.

22 Q. I understand, Mr. Welty, but in this document
23 you don't actually say there was a ban, do you?

24 A. I do not.

04:15:28 25 Q. And you anticipate that these regulatory

04:15:31 1 hurdles will be cleared up over the course of a year,
2 right?

3 A. They will be qualified and put into place is
4 what I say.

04:15:43 5 Q. Does "qualified and put into place" mean
6 getting approvals to import the avocados?

7 A. It's not necessarily clear. The regulatory
8 approvals and logistical processes will be qualified and
9 put into place. It's not specific to me that it
04:16:12 10 includes both regulatory approvals and logistical
11 processes.

12 Q. Okay.

13 A. So you're qualified to find out what the
14 processes are, and then you put them into place as you
04:16:26 15 can.

16 Q. Let's just jump to page 6 of 404. Second
17 paragraph. Do you see the reference to "Our trial has
18 received positive local and national press"?

19 A. I do not see that.

04:16:45 20 Q. Ricky will highlight it for you. Do you see it
21 now, Mr. Welty?

22 A. Yes.

23 Q. And you wrote -- this is something you wrote
24 into the plan as well, right?

04:16:55 25 A. Yes.

04:16:58

1 Q. Now --

2

MR. RAMOS-MROSOVSKY: We can take this
3 down.

4

04:17:05

5 Q. You're not a -- you said you weren't a Spanish
6 speaker, so that would have been information you
7 received from Mr. Rondón, a positive local press?

8

9 A. Yes.

10

04:17:22

11 Q. Now, you mention in your witness statement that
12 Mr. Rondón was active in various avocado professional
13 associations in Nicaragua, right?

14

15 A. Yes.

16

17 Q. Are you familiar with a company called MECA
18 Consulting?

19

04:17:37

20 A. I read about it in this article -- or in this
21 case.

22

23 Q. In this case. So would it surprise you to
24 learn that MECA Consulting applied to the institute of
25 agriculture -- to ask IPSA to seek permission for its
Hass avocados to reach the United States?

04:17:56

26 A. I did see that in the comment and -- yes.

27

28 Q. So you would -- you've learned through this
29 case that that happened six years ago?

30

31 A. Yes. I did not know it at the time.

32

04:18:24

33 Q. Now let's just have a look at a document R-194.
34 Let's pull it up.

04:18:35 1 Have you seen this document before,
2 Mr. Welty?

3 A. I reviewed it while reviewing the comments,
4 yes.

04:18:48 5 Q. Okay. This is a letter from the US Department
6 of Agriculture, APHIS, dated May 25, 2018 to engineer
7 Ricardo Somarriba Reyes, executive director of IPSA. Is
8 that right?

9 A. Yes.

04:19:08 10 Q. IPSA, we'd agreed earlier, was the Nicaraguan
11 phytosanitary body, right?

12 A. Uh-huh.

13 Q. So this is, I think we can agree, a
14 communication from the US phytosanitary agency to the
04:19:18 15 Nicaraguan one, correct?

16 A. That -- yes.

17 Q. And, again, I just want to characterize this to
18 be sure we're on the same page. That would be a
19 government-to-government communication, wouldn't it?

04:19:33 20 A. Correct.

21 Q. And in this letter -- the letter is signed by
22 Andrea Simao, assistant deputy administrator for
23 phytosanitary issues management. Do you see that?

24 A. Yes.

04:19:48 25 Q. And it says:

04:19:48 1 "We are writing in response to your letter
2 dated May 8, 2018, in which you expressed interest in
3 importing to the United States fresh Hass avocado fruit
4 from the company, MECA Consulting."

04:20:02 5 Do you see that?

6 A. Yes.

7 Q. And MECA Consulting was also located in the
8 municipality of Jinotega, right?

9 A. I'm not sure where it was located.

04:20:11 10 Q. Well, that's what the letter says at any rate.

11 A. Yes.

12 Q. Fair enough. I'm not asking for you to vouch
13 for it, but you see it on the page.

14 A. Yes.

04:20:24 15 MR. RAMOS-MROSOVSKY: My apologies to the
16 interpreters.

17 Q. I'll just ask it again. I'll try to be slower.

18 Do you see, Mr. Welty, where APHIS
19 describes MECA Consulting as being located in the
04:20:49 20 municipality of Jinotega?

21 A. Yes, I do.

22 Q. Of course, Hacienda Santa Fé was also located
23 in Jinotega, wasn't it?

24 A. Yes, it was.

04:21:00 25 Q. And we see in the next paragraph of this letter

04:21:04 1 that the APHIS official asks IPISA to provide the
2 prerequisite information listed in the enclosed
3 document, right?

4 A. Yes.

04:21:19 5 Q. And in the next paragraph the APHIS official
6 advises that:

7 "Once APHIS receives this information, we
8 will proceed to developing the pest risk assessment
9 (PRA) for this commodity from Nicaragua into the United
04:21:32 10 States."

11 Do you see that?

12 A. Yes.

13 Q. And at the bottom of the page, do you see where
14 it says "enclosure"?

04:21:44 15 A. Uh-huh.

16 Q. Now, we're fortunate that we have the
17 enclosure, so let's go to the next page and just to be
18 clear, Mr. Welty, have you seen these documents as well
19 in the course of reviewing this case?

04:22:00 20 A. I've seen the previous document. And this one,
21 I'm not certain if I have read it or not. I would have
22 to read through it and recall my memory to see.

23 Q. Why don't you take a moment, Mr. Welty?

24 A. The document does seem familiar, that I have
04:22:55 25 read it, but I do not recall when I read it.

04:22:58 1 Q. I'm only going to ask you what it says,
2 Mr. Welty. If you feel uncomfortable, tell me.
3 Do you see at the top of the page it lists
4 the prerequisite requirements for commodity risk
04:23:10 5 assessments?
6 A. Yes.
7 Q. And let's just touch on the headings. It will
8 be tedious to read every line.
9 Do you see the first thing APHIS wants is
04:23:21 10 information about the commodity proposed for importation
11 into the United States?
12 A. Yes.
13 Q. Do you then see shipping information?
14 A. Yes.
04:23:33 15 Q. And I think -- let's call it sub-point 2 there:
16 "Method of shipping in international
17 commerce and under what conditions, including type of
18 conveyance and type, size and capacity of packing boxes
19 and/or shipping containers?"
04:23:48 20 A. Yes, I see that.
21 Q. So would it be fair to infer from this, that
22 you would need to have an answer to (2) before APHIS
23 would take action to potentially approve the proposed
24 import of the product at issue?
04:24:12 25 A. Well, yeah, if you're importing, they're going

04:24:14 1 to have a list of steps that are required to take in
2 order to move forward and this is APHIS' version.

3 Q. And then the next header here:

4 "Description of all pests and diseases
04:24:27 5 associated with the commodity proposed for exportation
6 to the United States."

7 A. Yes.

8 Q. Then we have:

9 "Current strategies for risk mitigation or
04:24:36 10 management."

11 A. Okay.

12 Q. I take it that that and the one above would
13 both be relevant to the Med fly, wouldn't they?

14 A. Yeah, the entire document would need to
04:24:49 15 preclude the Med fly from entering the US.

16 Q. Right. Then let's just go to the next page
17 briefly. You see information about post-harvest transit
18 and processing?

19 A. Okay. The last heading, okay.

04:25:23 20 Q. Now, this letter is from 2018, I think as we
21 established, Mr. Welty?

22 A. Uh-huh.

23 Q. Would it surprise you that MECA are still
24 waiting to be allowed to export their avocados to the
04:25:34 25 United States?

04:25:34 1 A. Well, I don't know much about MECA's Hass
2 avocado operations or where they stand, so I cannot
3 answer that question.

4 Q. Fair enough, Mr. Welty.

04:25:47 5 Now, I believe you testified that INAGROSA
6 also planned to export avocados to Costa Rica in 2018
7 and 2019. Is that right?

8 A. That is correct.

9 Q. Are you aware that to obtain export
04:26:03 10 authorization to Costa Rica, INAGROSA would have
11 required a Nicaraguan phytosanitary certificate?

12 A. Yes, I'm aware of that, and there are people
13 that are aware of that in our operations in Hacienda
14 Santa Fé.

04:26:19 15 Q. And I think we actually discussed this earlier.
16 I think you agreed with me that INAGROSA never obtained
17 an avocado export phytosanitary certificate from
18 Nicaragua, did it?

19 A. As -- prior to the June 18th event, I'm not
04:26:34 20 aware of it.

21 Q. In fact, INAGROSA never applied for one, did
22 it?

23 A. I would not have been involved with that
24 process.

04:26:46 25 Q. You mentioned Canada earlier, Mr. Welty. I

04:26:50 1 believe your testimony was that until the avocados could
2 enter the United States, INAGROSA would export to
3 Canada. Do you remember saying that in your witness
4 statement?

04:26:58 5 A. Yes, I do.

6 Q. Are you aware, Mr. Welty, that Nicaragua has
7 never exported fruit to Canada, on a commercial scale, I
8 should say?

9 A. On your document, I've seen that -- that
04:27:14 10 statement.

11 Q. You've seen that document?

12 A. Yeah, I've seen that document, and I understand
13 what you're saying. I do know that they do export to
14 Canada other food products such as coffee.

04:27:27 15 Q. But certainly not avocados or fruit?

16 A. Not avocados, correct.

17 Q. And you'd agree with me, I think, that INAGROSA
18 would still need to get export certification -- export
19 approval from Nicaragua to send those avocados to
04:27:46 20 Canada, correct? It didn't do it?

21 A. No, the Canadian import restrictions -- as I'm
22 aware, there's no restriction to import Hass avocado
23 from Nicaragua to Canada.

24 Q. Mr. Welty, I didn't ask you if there was a ban,
04:28:07 25 but are you aware that Canada would still need to

04:28:09 1 conduct a risk assessment?

2 A. The Canadian process was such that the
3 inspection of the product would be done at their ports.

4 Q. So there was a process?

04:28:22 5 A. In Canada.

6 Q. In Canada. Well, that's not in your witness
7 statement, is it, Mr. Welty?

8 A. I don't believe so.

9 Q. Now, Mr. Welty, I'd like to direct you to a
04:28:43 10 document called -- labeled C-55. Have you seen this
11 document before, Mr. Welty?

12 A. Yes, I have.

13 Q. Now, if we scroll to the last page, we see that
14 it is signed by Mr. Carlos Rondón, dated September 12,
04:29:08 15 2022.

16 Did you have any hand in preparing this
17 document, Mr. Welty?

18 A. I did not.

19 Q. You did not. Okay. Well, let me show you a
04:29:18 20 few things in this document, if I may, and you tell me
21 how you react to it.

22 Let's just look at the third page first.
23 Do you see your name at letter 8(h)?

24 A. Yes, I do.

04:29:39 25 Q. And this letter describes you as the US-based

04:29:45 1 chief financial officer, correct?

2 A. Yes, during the time frame between 2015 and the
3 time of June 2018.

4 Q. And then at No.9 -- or 9(a), I should say --
04:30:02 5 there's a list of US-based staff salaries, right?

6 A. Correct.

7 Q. And then there's a listing of your name with
8 \$150,000 salary next to it, right?

9 A. Yes, that was -- my understanding was that that
04:30:18 10 was going to begin in the fall of 2018 as we had
11 obtained funding earlier in the year, and we were going
12 to start aggressively on the expansion and my time would
13 be dedicated 100 percent to INAGROSA.

14 Q. But that's not what this says, is it?

04:30:40 15 A. It says you're entitled to the following
16 compensation, but it doesn't -- at what point, I'm not
17 sure.

18 Q. Fair enough. Did you have a written agreement
19 with INAGROSA, Mr. Rondón?

04:30:54 20 A. I did not.

21 Q. Now, I'd like to just direct you to page 6.
22 You see paragraph 25, Mr. Welty?

23 A. Yes.

24 Q. It says:

04:31:15 25 "INAGROSA sought 'third-party' funds from

04:31:18 1 outside of the Riverside corporate group for its
2 expansion."

3 Do you see that?

4 A. Yes.

04:31:26 5 Q. And I appreciate that you didn't write this
6 document, but obviously, as you've told me, you were
7 working closely with Mr. Rondón.

8 By "third-party funds," that means funds
9 not related to Mr. Rondón's in-laws, doesn't it?

04:31:43 10 A. Yes. Well, I -- well, outside the Riverside
11 group, yes.

12 Q. And if we turn to the next page, page 7,
13 paragraph 28:

04:32:04 14 "INAGROSA management was prepared to
15 pledge the Hacienda Santa Fé farm land as collateral for
16 outside investment."

17 Do you see that?

18 A. Yes.

19 Q. Now I'd like to take you to page 8.

04:32:30 20 Here, in paragraph 34, it states that:

21 "INAGROSA had commenced a process to
22 obtain US Department of Agriculture approval of the Hass
23 avocado crop."

24 Do you see that?

04:32:51 25 A. Yes.

04:32:54 1 Q. It "planned to sell avocados into the US market
2 after the 2018 harvest once it obtained USDA approvals."

3 Do you see that?

4 A. I see that.

04:33:07 5 Q. This letter indicates that INAGROSA anticipated
6 that approval to occur no later than 2019?

7 A. That was written in the statement, yes.

8 Q. I understand you didn't write that.

9 Now, there's no mention here of a
04:33:18 10 regulatory ban, is there?

11 A. No.

12 Q. Now, this letter was sent to -- if we can go
13 back to the first page -- Mr. Kotecha, correct?

14 A. Yes.

04:33:31 15 Q. And if we see in the first paragraph, it tells
16 us that this letter was written for the purpose of
17 Mr. Kotecha relying upon it in his expert report. Do
18 you see that?

19 A. Yes.

04:33:56 20 Q. Now, I just have a couple more questions for
21 you, Mr. Welty. Let's go to the last page of this.
22 This is page 9.

23 It says in paragraph 41:

24 "Management had preliminary contacts about
04:34:13 25 the business plan in the United States. At that time,

04:34:18 1 management found a limited appetite for new investment
2 in foreign agricultural commodities."

3 Is that a reference -- do you understand
4 that to be a reference to your efforts to pitch INAGROSA
04:34:29 5 to institutional investors?

6 A. Yes.

7 Q. And, ultimately, no outside capital was
8 obtained, correct?

9 A. No outside capital outside of Riverside,
04:34:41 10 correct.

11 Q. Mr. Welty, that's all I have for now. Thank
12 you very much for your attention to my questions.

13 PRESIDENT: Thank you. Redirect? Would
14 you like to have a break?

04:34:53 15 MR. APPLETON: I think, Mr. President,
16 it's probably appropriate to take our break now.
17 Probably the interpreters and translators -- the
18 translators and the transcript team, I'm sure, would
19 probably like a little break. It's been scheduled
04:35:07 20 shortly anyway.

21 PRESIDENT: Yeah, we would have to take a
22 break in ten minutes in any event, unless your redirect
23 lasts less than ten minutes.

24 MR. APPLETON: I'm afraid that's not very
04:35:18 25 likely.

04:35:19 1 PRESIDENT: Let's break for 15 minutes
2 until 16:50. And, sir, I should remind you again you
3 cannot speak with anybody about your testimony. You are
4 still under examination.

04:35:35 5 MR. WELTY: Okay.

6 *(Brief Recess)*

7 PRESIDENT: Please go on.

8 MR. APPLETON: Excellent. Thank you very
9 much, Mr. President.

04:54:11 10 **DIRECT EXAMINATION**

11 BY MR. APPLETON:

12 Q. So, Mr. Welty, I have a number of questions
13 that are going to arise from the discussion that you had
14 earlier today, and what I'm going to try to do, wherever
04:54:21 15 I can, is try to provide some reference to the record as
16 best as I can and try to take us through it, and the
17 whole idea is to make it easier for the record that we
18 have here so that we can all understand what's going on.

19 A. Okay.

04:54:36 20 Q. And if I'm unclear, let me know, and take your
21 time, please, to make it easier for the interpretation
22 and for the transcription. Okay. So we're all going to
23 just breathe and make it nice and simple for everybody.
24 Okay?

04:54:51 25 A. Okay.

04:54:54 1 Q. It will just make it easier.

2 A. All right.

3 Q. And then when I'm done, it may very well be
4 that the members of the Tribunal may have some questions
04:55:02 5 as well. And you have your witness statement as well
6 and, again, we'll try to do our best to be able to
7 project items up on the screen.

8 First of all, I'm going to take you to
9 something that doesn't require anything up on the
04:55:14 10 screen. Around minute 14:40 today, Mr. Ramos-Mrosovsky
11 asked you about translation during your visits to
12 Hacienda Santa Fé. Do you remember that question?

13 A. Yes, I do.

14 Q. Did you only have one person translating for
04:55:26 15 you during your visits?

16 A. There was another gentleman, Francisco Rivera,
17 who spoke a little English, and I spoke with him.

18 Q. And that was in addition?

19 A. In addition to Carlos, yes.

04:55:37 20 Q. I see. And on your trip to Hacienda Santa Fé
21 in November 2015, you remember that we had a discussion
22 about that. It's at minute 14:43 today. Do you
23 remember a discussion about that?

24 A. Yes, about the visit.

04:55:54 25 Q. Yes. And during that visit,

04:55:56 1 Mr. Ramos-Mrosovsky asked you if you saw a refrigerated
2 area. Do you recall that?

3 A. Yes, I do.

4 Q. Okay. During your visit he mentioned as well,
04:56:08 5 later on, that you had been there and he totaled the
6 days and he suggested that you were there for two days
7 or so.

8 During your visits, plural, did you see
9 the entirety of the 1224 hectares of Hacienda Santa Fé?

04:56:21 10 A. I saw a good portion of it, but no, not the
11 entirety.

12 Q. So there could be things you didn't see?

13 A. Oh yeah, quite a bit.

14 Q. But you did see some things.

04:56:38 15 A. Yes, we drove from site from end to end.

16 MR. APPLETON: You're right. I have lots
17 of time. I'll do my best to slow down as well.

18 Q. Mr. Ramos-Mrosovsky took you to talk about some
19 operations at Hacienda Santa Fé in 2014. Remember he
04:56:54 20 asked you about the status of operations back then?

21 A. Yes.

22 Q. And he asked you a question about the entirety
23 of the Hass avocado operations, but I'm not sure it was
24 clear. When I read the transcript it certainly wasn't
04:57:15 25 clear that he limited it -- but he asked you to recall

04:57:18 1 and termed it as an early development project. And you
2 agreed with that?

3 A. In 2014 are we referencing?

4 Q. Well, the problem is he first took you to 2014,
04:57:29 5 but it looks like his question was for the entirety of
6 everything that was underway.

7 A. No, I mean, in 2014 it was the beginning.
8 2013, 2014. But by the time of the invasion, we had
9 over 16,000 or 17,900 trees, I believe. That's a pretty
04:57:48 10 sizable Hass avocado operation.

11 Q. Now, do you recall that Arbitrator Greenwood
12 asked you a question --

13 MS. CONOVER: Mr. Appleton, I'm sorry to
14 interrupt, but the translator hasn't finished
04:58:04 15 translating the question when you are jumping to the
16 next --

17 MR. APPLETON: What I'm going to do is I'm
18 going to put the Spanish translation on. I won't know
19 what they're saying, but I will be able to hear when
04:58:14 20 they're finished. Except it is causing a problem with
21 the wireless.

22 PRESIDENT: Keep in mind that there is not
23 only somebody interpreting, but there is also somebody
24 writing down what you say.

04:58:52 25 MR. WELTY: Thank you.

04:58:55 1 MR. APPLETON: We are very thankful for
2 the exceptional work that they're doing. I will do my
3 best to try to be as mindful as I can.

4 Q. So I'm going to ask that we look at
04:59:08 5 Exhibit C-404 on page 2 for a moment. And while they're
6 bringing that up on the screen, I'm going to just go
7 back to the question that Arbitrator Greenwood had
8 asked.

9 If you recall, there was a clarification
04:59:25 10 that you had made in paragraph 42 of your witness
11 statement. You have the witness statement there.
12 Remember there was a clarification that you made, sir?

13 A. Okay.

14 Q. Okay? And -- so that's on page 6 of your
04:59:40 15 witness statement. Do you see that?

16 A. Yes, I have that paragraph up.

17 Q. And then the question that Arbitrator Greenwood
18 asked was: "Are you able to identify which business
19 plan you were referring to that had the 16,000?"

04:59:56 20 Do you remember that question?

21 A. I don't.

22 Q. So I'll just help with everyone. Originally
23 she asked the question to counsel for the Republic of
24 Nicaragua, and then she said I should ask the question
05:00:09 25 to you as a witness.

05:00:10 1 A. Oh, okay.

2 Q. Does that refresh your memory?

3 A. It refreshes my memory, but the detail or the
4 contents I'm a bit fuzzy on.

05:00:17 5 Q. Don't worry. I'm going to help solve this
6 problem for everybody.

7 Can I bring to your attention, please --
8 let's look at page 2 of Exhibit C-404. This is one of
9 your business plans.

05:00:28 10 And can we just focus in on where the
11 number that we had about -- 60,000 trees is the number
12 that we're talking about? Yes, can you just highlight
13 that? Can we blow that up with that marquee thing?
14 Excellent.

05:00:55 15 Okay. So this business plan, C-404, is it
16 possible that that is the business plan that you were
17 clarifying?

18 A. It is possible, yes.

05:01:07 19 Q. Could we go to the first page of that just for
20 a moment so you can see which one that is, if that will
21 help you? I guess it doesn't because it doesn't say.
22 We can go back to the chart, if we want, to identify.
23 So let's go look at the chart to see which one C-404 is.

05:01:31 24 And that is the May 24, 2018 business plan
25 to Mr. Mark Soane at Glidepath.

05:01:36

1 A. Yes.

2 Q. So, you have to look at it. I'm not giving the
3 evidence, sir. You are. Can you look at this and tell
4 me does that make sense for your clarification?

05:01:47

5 A. Yes, C-404 was the one to Mark Soane on May 24,
6 2018.

7 Q. Is it possible that's the clarification that
8 you were referring to -- the question was which business
9 plan were you referring to in your clarification in
10 paragraph 42?

05:02:02

11 A. In 42.

12 Q. You were just there.

13 A. Yes, that would be. Okay. Yes.

05:02:18

14 Q. So that's good. We're just trying to make sure
15 that we can answer all the pieces that are here. As I
16 say it nice and slowly to assist everybody along here.

17 Now, Mr. Ramos-Mrosovsky asked you about
18 some patents at minute 14:59. He said because Hass
19 avocados are a patented technology and you would have to
20 bring it in. Do you recall that conversation?

05:02:38

21 A. Yes.

22 Q. So, first of all, you don't have any patent law
23 training, correct?

24 A. No, I don't.

05:02:52

25 Q. And as a legal matter, are you aware that

05:02:54 1 patents have a limited lifespan?

2 A. Yes, I am aware of that. I'm not sure how
3 long --

4 MS. CONOVER: Mr. Appleton, excuse me.
05:03:02 5 We're losing interpretation because you're going too
6 fast, and you are not making pauses.

7 MR. APPLETON: Let's go back. Do I need
8 to repeat what I said?

9 MS. CONOVER: It may be useful if you
05:03:11 10 could repeat your last question.

11 Q. Okay. So just a moment ago, Mr. Welty, you
12 said that you're aware that there's a limited lifespan
13 of patents; you're just not aware of what the length of
14 time is?

05:03:26 15 A. Yes.

16 Q. Do you know when the Hass avocado patent was
17 issued?

18 A. 1935.

19 Q. All right. Would it surprise you, sir, that
05:03:35 20 maybe the patent is expired?

21 A. It would not surprise me.

22 Q. Okay. So when you made that comment to
23 Mr. Ramos-Mrosovsky, were you -- in light of this, do
24 you still stand by your position that the Hass avocado
05:03:50 25 is under patent?

05:03:58 1 A. That's -- since I did not -- I do not know the
2 length of the patent in this situation. I am not
3 certain about the length and, thus, who owns that patent
4 as of today.

05:04:11 5 Q. So when you made the comment affirmatively that
6 it was under patent, you were not aware of whether that
7 was correct?

8 A. Yes.

9 Q. Okay. Got it. Next. And just to confirm,
05:04:27 10 when you discussed your job duties here, is there any
11 place in your witness statement that you described your
12 job duties as dealing with the import or export of the
13 Hass avocado plants?

14 A. Hass avocado plants? No, we were not exporting
05:04:43 15 Hass avocado plants.

16 Q. And you weren't involved in the import?

17 A. Nor the import of the plants, no.

18 Q. All right. Now, I want to talk about --
19 Mr. Ramos-Mrosovsky took you through many, many business
05:04:59 20 plans over the course of the afternoon. I'm not even
21 going to give you the specifics because he did it so
22 many times and so many places, right?

23 A. Yes.

24 Q. Can you tell us why you didn't get outside
05:05:12 25 investment?

05:05:16 1 A. Well, we explored the option of bringing in
2 outside investment, believing that bringing in an
3 outside investor could add value to the project, but as
4 we went through the process, we were pursuing it, but in
05:05:36 5 March of 2018, Riverside decided that they wanted the
6 project to continue -- not continue but to accelerate.
7 And so they made the commitment so we did not have to
8 worry about getting outside capital, making the business
9 plan process no longer necessary.

05:06:03 10 Q. Mr. Welty, that wasn't my question, but that's
11 okay.

12 A. Okay.

13 Q. I asked you was there a reason that somebody
14 gave you why they didn't give you -- as Mr. --

05:06:18 15 A. Okay.

16 Q. -- Ramos-Mrosovsky asked you these questions,
17 he suggested you made these various proposals at
18 numerous times. But can you just tell us the reasons
19 that they didn't?

05:06:30 20 A. The reasons largely were that it did not fit
21 into their investment criteria. They were maybe not
22 necessarily into the agricultural business, or they did
23 not want to invest in the international business.

24 Q. Okay. Now, after the coffee break that we
05:06:51 25 had -- not this one, the previous one --

05:06:54 1 Mr. Ramos-Mrosovsky asked you about a document,
2 Exhibit C-404, the one that we actually have up here,
3 and he took you through and discussed in this a variety
4 of investments that you were prepared to make in the
05:07:10 5 future in electricity and a packing plant. I believe he
6 took you to page 2.

7 Do you recall that conversation?

8 A. Yes.

9 Q. I just want to identify that -- I believe it's
05:07:26 10 here on the bottom -- there's a paragraph that was on
11 the page, but I'm not sure that you had an opportunity
12 to read. I just want to put it up here for a minute.

13 You see the second line here where you
14 talk about the specific issues that he asked you about?

05:07:46 15 A. Yes.

16 Q. So were you going to make all those investments
17 at one time, or is it as you've identified in this
18 document? I want to make sure that we understand what
19 you were saying.

05:07:59 20 A. Well, we were -- I guess to be specific on this
21 is we were going to make investments as we could. We
22 now had the funding for it, and these projects were
23 going to be done as we could, but specifically, if you
24 look at the three-phase electricity, that is something
05:08:19 25 we wanted to get in as quickly as possible. And the

05:08:23 1 drip irrigation was -- the intent was to get that in,
2 but the actual timing of that would be dependent on
3 several factors. Considering that the Hacienda Santa Fé
4 had an abundance of rainfall, we did not need water, but
05:08:43 5 we wanted to use drip irrigation as a way to enhance the
6 growth and the control of the business as well as just
7 having some more control over the water. So we were
8 going to phase that in at the appropriate time.

9 Q. Are you aware of what the period of time would
05:08:58 10 be for that phase-in generally?

11 A. It would have been probably sometime, you
12 know -- this is 2018. So 2019, '20, '21 kind of time
13 frame.

14 Q. Generally it's years?

05:09:16 15 A. Yeah.

16 Q. And it was in the future?

17 A. Yeah.

18 Q. I just want to understand this generally.

19 Okay.

05:09:22 20 A. It was not required for us to have it to have
21 the operation go forward.

22 Q. Now, around 15:43 -- this time more precise --
23 Mr. Ramos-Mrosovsky discussed the projected operating
24 margins with you. Do you remember that discussion?

05:09:43 25 A. Yes, he did.

05:09:45 1 Q. He invited you to explain, on our time, how you
2 got to the numbers in your proposal. Are you able to
3 explain that for us?

4 A. The operating margins --

05:09:57 5 Q. I'm going to sit down because it may take a
6 minute or two, if you don't mind.

7 A. Okay. Looking at the operating margins of our
8 operations was -- the beauty of it was is that we were
9 selling our commodity on a world market, getting US
05:10:14 10 dollar pricing or equivalent, yet we were running the
11 operation using Nicaraguan currency, which has been a
12 very weak currency over the past many years.

13 So when you look at the numbers, and being
14 a finance guy like I am, a numbers guy, is that you
05:10:32 15 start looking at the margin opportunity. It's very
16 compelling.

17 To walk you through hopefully a very
18 simple explanation -- I'll try to make it, you know,
19 make sense -- is if you look at the cost of operating a
05:10:59 20 Hass avocado farm at maturity, I believe in Duarte's
21 expert report he talks about in Michoacan, Mexico they
22 average about \$3700 per hectare of land on an annual
23 basis for the operations to maintain that avocado on one
24 hectare. So your cost is very, very low.

05:11:28 25 If you then look at how much can one

05:11:32 1 hectare of land produce on that land and you say, okay,
2 so we have one hectare of land -- and I'll use Duarte's
3 report again where he said there's 667 trees in a high
4 density plantation that you can plant on one hectare.

05:11:53 5 To make our math simple, let's say it's 600 trees per
6 hectare.

7 So if you take 600 trees on the land and
8 you generate, at maturity, 50 kilograms of production on
9 that land, that's 30,000 kilograms of fruit on one
05:12:16 10 hectare of land. And if you're able to get the world
11 prices, which we would be able to -- or we believe we'd
12 be able to -- and say you got a \$3 price on that, a
13 hectare of land could generate \$90,000 in income, in
14 revenue, with a cost of \$3,700 to maintain that.

05:12:42 15 So on a gross margin basis, you look at
16 this business, you're generating \$90,000 in revenue off
17 a \$3,700 a year annual cost, which is a tremendous
18 margin, well over 90 percent gross margin on it.

19 PRESIDENT: Would not other producers of
05:13:06 20 avocado have the same possibility of -- and some of them
21 are producing in low cost countries, no, benefiting at
22 the same time from the global market prices?

23 MR. WELTY: Yes, if they were getting
24 world prices for their avocados, yeah, they would have
05:13:28 25 that same opportunity if they had the ability to export.

05:13:32 1 PRESIDENT: Would you know where the
2 avocados that are sold in the US market are produced
3 mainly?

05:13:44 4 MR. WELTY: In the US market, the vast
5 majority come from Mexico. I believe -- I want to say
6 it's 80 percent. I shouldn't say that, but it's a very
7 high percentage of the consumption or the imports come
8 from Mexico in the US. However, they do get from --
9 actually, they get it from Peru, they get it from
05:14:03 10 Colombia. Guatemala is about ready to -- they're in the
11 Federal Register right now, very close to getting
12 approval to import into this country.

13 Interesting, they also have the Med fly
14 problem, as does Colombia, as does Peru, so the Med fly
05:14:22 15 is not an insurmountable hurdle. I think the Dominican
16 Republic also comes into the US. California is a
17 producer but they've had water troubles, climate issues,
18 which their production has declined over the long term.

19 PRESIDENT: Would the cost of production,
05:14:41 20 say in Mexico or Peru or Dominican Republic, be roughly
21 similar to Nicaragua?

22 MR. WELTY: I believe it would be less,
23 just because I think -- you know, if you look at the
24 value of the currency over the last several years, the
05:14:55 25 value of Nicaraguan currency has steadily declined

05:14:59 1 relative to the US dollar, and the cost of labor is, you
2 know, very low.

3 PRESIDENT: Sorry for the interruption,
4 Mr. Appleton.

05:15:09 5 MR. APPLETON: Mr. President, first of
6 all, we're here so that the Tribunal understands.

7 Second of all, I was going to ask the
8 witness to basically help us to understand how
9 Nicaragua's terms of trade fit in to, for example,

05:15:22 10 Mexico. But I think he's just answered that.

11 Q. Did you have something that you want to add
12 with respect to -- for example, since Mexico is the
13 largest supplier to the United States, whatever the
14 number is, the largest? Do you have something to add in
05:15:36 15 terms of the comparative benefits of Nicaragua versus
16 Mexico on that?

17 A. A lot of it would be -- I should slow down.

18 A lot of it would be with the currency
19 issue. I'm not sure there's -- why don't we leave it at
05:16:01 20 that at this point.

21 Q. Mr. Welty, do you know if Nicaragua is
22 exporting other avocados besides Hass avocados?

23 A. Yes, they export avocados of a green skin
24 variety to Costa Rica right now. And we actually
05:16:16 25 visited those plantations on our second visit to

05:16:22 1 Nicaragua in November -- in September 2017. So they
2 sell their product into Costa Rica, so they have export
3 permits to get there.

4 While we visited them, we actually
05:16:38 5 described our experience at the Hass Avocado Congress to
6 the other avocado growers, and there was a lot of
7 excitement surrounding that. Actually there was an IPSA
8 person there that we had some conversations with as
9 well.

05:16:50 10 So we had a very, you know, productive
11 part, and we would have been the major Hass avocado
12 producer in Nicaragua if it hadn't been for the events
13 that happened in June. So the fact that we're -- that
14 they're not exporting Hass avocado, to me, is irrelevant
05:17:12 15 because we -- we were there. We had it going. We had
16 16,000 trees and we had a very viable growing operation.

17 MR. APPLETON: If the Tribunal is finished
18 with its questions, I can proceed.

19 Q. All right. I'd like to turn to a slightly
05:17:31 20 different topic.

21 At 16:10 in the transcript,
22 Mr. Ramos-Mrosovsky asked you questions about your
23 contact with Erik Hansen. If you recall, he took you to
24 a letter. It is an email you had with Laura Sherman
05:17:44 25 from Senator Bennet's office, and that letter identified

05:17:48 1 Mr. Hansen as the agricultural attaché for the USDA in
2 Costa Rica. Do you remember that discussion?

3 A. Yes.

4 Q. He asked you a question, and you told him
05:18:00 5 that -- he told you that you did not address this topic
6 in your witness statement, and he asked you if you
7 agreed with that and you said yes. But I'd like you to
8 look at paragraph 83 of CWS-11.

9 MR. APPLETON: Can you put it up on the
05:18:17 10 screen? It will make it easier so everyone can see it.
11 Can you put just paragraph 83 up so everyone can read
12 it?

13 Q. I just want to make sure because this says, in
14 83:

05:18:36 15 "We had contacts with the USDA team at the
16 US embassy in Costa Rica."

17 It doesn't say any names, but would that
18 have been the email from Ms. Sherman to discuss with
19 Mr. Hansen and his colleagues at the USDA based in
05:18:55 20 Costa Rica? Does this talk about that issue?

21 A. Yes, that does.

22 Q. Take a minute to read it, just to make sure.

23 A. I read it here while you were talking, and yes,
24 we had had discussions with Erik Hansen and his
05:19:09 25 colleagues at the US embassy. The fact that I did not

05:19:13 1 recall putting it in my witness statement was an error
2 on my part.

3 Q. Okay. So can you describe your communications
4 with the USDA reps, please?

05:19:23 5 A. Yeah, we spoke to them about the steps we
6 needed to take to get the inspection of our Hass
7 avocados ready to come into the United States, and we
8 talked about earlier that we were working on a separate
9 path of lobbying to get that Med fly restriction removed
05:19:48 10 from the regulation.

11 Relative to Mr. Hansen and his colleagues,
12 we talked about we would appreciate his help and
13 insights to move this process along with the USD and the
14 APHIS group which is in charge of it to discuss -- or to
05:20:07 15 plan out how we could export our product into the United
16 States.

17 So we arranged for him to actually come to
18 our farm in the fall of 2018. In conjunction is that he
19 was concerned about the -- he had very low confidence in
05:20:29 20 the ability of the Nicaraguan government at that point
21 on the inspection process. So he wanted to come to our
22 farm to discuss a pre-inspection process for Hacienda
23 Santa Fé Hass avocados as well as understand the -- at
24 the same time he would explore the requirements or the
05:20:50 25 inspection process for the Nicaraguan authorities.

05:20:55 1 Q. So, Mr. Welty, I'm going to now take us back to
2 the email that was put before you earlier, the email
3 with Laura Sherman. I believe it is -- I believe it's
4 C-366.

05:21:09 5 MR. APPLETON: Just put it up, and I'll
6 get the number, I promise. We've all seen it a lot
7 today. The number is C-0466.

8 Q. And if we could go to the section from FSA that
9 we were looking at earlier, you recall this discussion?

05:21:28 10 MR. APPLETON: Can you just go to this
11 part where it talks about -- let's start with -- stop
12 for a second.

13 Q. You see the part that says, "I reached out to
14 my colleagues in legal affairs" and then we talked about
05:21:43 15 that entity NPPO?

16 A. Yes.

17 Q. Do you recall that discussion? All right.
18 Here it talks about Mr. Hansen. Do you see that
19 discussion?

05:21:53 20 A. Yes.

21 Q. Okay. Can you just explain the relationship
22 between your conversations with Mr. Hansen and the
23 general information that was provided in the paragraph
24 before? Because I just want to make sure that that's
05:22:08 25 very clear for everybody about the content of those

05:22:11 1 conversations with that team.

2 A. I'm not sure I completely -- can you --

3 Q. Just help us to understand.

4 You said that you were involved in a
05:22:27 5 regulatory process here?

6 A. Correct.

7 Q. This is part of your discussions on that
8 process, correct?

9 A. Yes.

05:22:35 10 Q. How many steps are there in that process? Is
11 it just one issue about APHIS on a list that's a
12 prohibition, or is it more than one? I'm just trying to
13 understand.

14 A. There --

05:22:46 15 Q. I am just trying to understand what you were
16 doing, Mr. Welty.

17 A. There's the issue of understanding the
18 inspection process that is required for produce to enter
19 the US. And so you have -- what's relevant there is
05:23:03 20 that it's up to the United States to determine what the
21 inspection requirements are to bring avocados in to the
22 country. It's not up to Nicaragua telling us that.

23 It's what the US wanted to -- needed to feel safe that
24 the product that's come into the product -- into the
05:23:30 25 country was -- passed their standards. And as he

05:23:34 1 showed, there's a complete list of what you have to go
2 through to get to that process.

3 But with Erik Hansen, we were there -- he
4 was coming to understand more about the Nicaraguan
05:23:46 5 process as well as our process, and he would facilitate
6 our discussions going forward with the USD and APHIS to
7 approve the importation of the avocados into the US.
8 And that would take time.

9 Q. So, Mr. Welty, just to understand, Mr. Hansen
05:24:09 10 or his team's suggestion would be that then you might
11 not have to go to that NPPO process, that they had their
12 own -- I'm trying to understand the relationship.

13 A. Yes, it was that they -- the US would not
14 require any certification from Nicaragua to import the
05:24:33 15 products.

16 MR. RAMOS-MROSOVSKY: Mr. President, if I
17 may, I think I need to object here. We're having either
18 new testimony from counsel or speculation about what --
19 about how regulations could have been bypassed. This is
05:24:48 20 a completely new argument on which there's been no
21 evidence whatsoever, and counsel is testifying about it
22 for the witness. My objection isn't really to the
23 testimony from the witness, but the question is
24 suggesting a legal argument that should have been made
05:25:03 25 some time ago.

05:25:04 1 MR. APPLETON: Mr. President,
2 Mr. Ramos-Mrosovsky had invited the witness to comment
3 on before the process with -- and he actually put in
4 specifically the answer that was incorrect into the
05:25:19 5 witness' mouth that he agreed with and it was in his
6 witness statement. If we look at the witness statement,
7 it said he had his contacts. We now look at the
8 statement that generated it, and we're asking can you
9 please explain the nature of what's there.

05:25:33 10 The witness has explained that process.
11 He's not a lawyer. He has tried to explain it. It was
12 a little confusing. I'm trying to understand just to
13 clarify what the nature of that evidence is. And that's
14 all that was the purpose of that question.

05:25:46 15 I'd also point out, Mr. President, that --
16 well, we'll leave it there for now because there's a
17 follow-up that will come.

05:25:58 18 PRESIDENT: It does go beyond the scope of
19 the cross-examination because the only issue that needed
20 to be clarified is whether this issue was mentioned in
21 the witness' witness statement. And you have clarified
22 that. No need to go beyond that.

05:26:18 23 MR. APPLETON: Then I'll turn to the next
24 piece, which is the point that Mr. Welty had been asked
25 questions, and he gave comments about the process

05:26:21 1 involving Canada. And so with respect to that process,
2 he explains that the Canadians had a different process
3 as well. I just wonder if he could -- I found that a
4 little confusing -- I wonder if he can just explain what
05:26:40 5 that was because it seems to be similar in some respects
6 to what was going on here.

7 Q. That's the question. Can you explain the
8 Canadian process? That's all. And your knowledge of
9 it. Your direct knowledge.

05:27:03 10 A. So the Canadian process is a different process
11 in the US. In Canada there is no restriction on Hass
12 avocado from Nicaragua, and there's no restriction or no
13 concern about the Med fly.

14 To get the product into Canada, there is
05:27:24 15 an inspection process that happens at the border and
16 with that, you're going to obviously need certificates,
17 phytosanitary certificates and stuff to get through the
18 border, and we would make sure that any product shipped
19 to Canada would have the appropriate inspection and
05:27:47 20 regulatory issues addressed in those shipments.

21 However, it was the importer who would
22 interact with the border where the inspected avocados
23 come in. So the avocados would come in, the importer in
24 Canada would be the ones that transfer that. They pay
05:28:09 25 the inspection fees to make sure that the avocados are

05:28:12 1 not coming in -- for pests and all that kind of stuff.

2 And, if approved, then the product is
3 available to be brought into the economy.

4 Q. Mr. Welty, can you just clarify, whose border
05:28:28 5 are you talking about?

6 A. This is the Canadian border. So it would be
7 the ports of entry into Canada.

8 Q. So they do the inspection, right? It's their
9 border you were talking about, not the Nicaraguan
05:28:39 10 border?

11 A. That is correct.

12 Q. That's the only question I had.

13 A. Okay.

14 Q. Okay. Now -- okay, you answered that.

05:28:52 15 On your visits, did you ever meet with
16 Nicaraguan government investment officials to talk about
17 exports?

18 A. We met with PRONicaragua, which is --

19 Q. Well, who are they?

05:29:08 20 A. They're -- they were a government agency which
21 would promote business development in Nicaragua.

22 Q. And could you just describe that contact? What
23 discussion did you have?

24 A. We went in to visit PRONicaragua in our 2017
05:29:24 25 visit. We went through, in detail, our project plan,

05:29:30 1 our estimates, our projections of what we were doing.
2 We talked about our farm. You know, the beauty of the
3 farm. But we really were there to help them understand
4 the world of Hass avocado and how Nicaragua, we
05:29:46 5 believed, was an ideal place for that, especially in the
6 Jinotega region, because it had great soils, it had
7 proper elevation, it had lots and lots of water. This
8 is a commodity that has been -- water is very important,
9 and there is -- the farm would receive anywhere from 80
05:30:09 10 to 120 inches of rainfall a year.

11 So they were very interested in what we
12 were doing, and we were going to continue on talking
13 with them over time as the project progressed.

14 Q. So just to be clear, that was in 2017?

05:30:27 15 A. 2017, correct.

16 Q. So they were aware of your avocado?

17 A. Oh, yes.

18 Q. And your plans to export?

05:30:40 19 A. Yes, that our target market was, you know,
20 world markets.

21 Q. All right. Now at 14:09 of the transcript,
22 Mr. Ramos-Mrosovsky asked you specifically if you were
23 lobbying Senator Bennet's office, and to that, you said
24 yes, you were.

05:30:54 25 Were you using that term colloquially, or

05:30:57 1 were you aware of the meaning and the definition of
2 "lobbying" under US federal law when you made that
3 statement?

4 A. It was more colloquial. It was we were talking
05:31:07 5 with them, and they were willing to help us as we needed
6 to help, if they could help appropriately.

7 Q. So you wouldn't know if that meets the
8 definition -- or if your answer was meeting the
9 definition of US federal law?

05:31:20 10 A. No, I do not know the federal US law on that.

11 Q. But you had people who you were intending to
12 get -- who would know that, yes?

13 A. As we started having those serious discussions,
14 absolutely.

05:31:34 15 Q. Okay. I just wanted to make sure that we're
16 very clear on that.

17 Now, Mr. Ramos-Mrosovsky at the beginning
18 asked you about the impact of the Roya fungus. Do you
19 recall that conversation?

05:31:47 20 A. Yes.

21 Q. Were you involved in the coffee business at
22 all?

23 A. At that point -- I mean, I never was.

24 Q. So are you aware of the technical or the
05:32:00 25 phytosanitary impact of Roya fungus upon the coffee

05:32:05 1 plants and their yield?

2 A. I'm not an agronomist on that. I did actually
3 see the Roya on my first visit, which was pretty
4 interesting. But I was not aware -- I was not an expert
05:32:23 5 on Roya or coffee at the time.

6 Q. But you did look at financial statements, yes?

7 A. The general statements, I'd seen a couple of
8 them, but I didn't look at them in detail because I was
9 focused on the avocado operation going forward.

05:32:41 10 Q. You said, sir, that the Roya fungus destroyed
11 the coffee business, but you didn't tell us about a
12 specific time, and I want to understand that. I mean, I
13 want to understand was that a general conclusion or was
14 it a one-time event, and if it was, what year you're
05:32:55 15 talking about, so that we're very clear about the nature
16 of your statements here.

17 A. The Roya attack, it came -- it didn't come
18 overnight. What the Roya would do is it would reduce
19 your production over a period of time to where it's no
05:33:15 20 longer economically viable. So I would have to confer
21 with our agronomist to tell you exactly what it was, but
22 I was there in 2015 and actually saw a coffee harvest
23 going on at the operations. Obviously not to the level
24 that it had been at its peak, but there was some coffee.
05:33:36 25 We saw workers picking and they processed them using

05:33:42 1 their wet mill. So it didn't end abruptly. It ended
2 over a period of time and it faded and I don't really
3 have an exact sense of the real numbers.

4 Q. Okay. I'm getting near the end of my questions
05:33:59 5 to you. I would like us to have you look at
6 paragraph 18 of your witness statement.

7 MR. APPLETON: Could you put it up on the
8 screen? It's not particularly long, if I remember. 18.
9 I don't know the page, I'm sorry.

05:34:34 10 Q. And you have it in front of you, Mr. Welty?

11 A. Yes, I see it.

12 Q. Can you just give me the first line -- first
13 two lines, please?

14 A. Carlos shared with me --

05:34:45 15 MR. APPLETON: Not you. I was asking
16 Mr. Garvey, who's been doing a fabulous job assisting
17 here.

18 Q. So if I could just have you just read, you can
19 read it to yourself, the second sentence. Do you see
05:34:58 20 the date there? Do you see that date?

21 A. 2014.

22 Q. Okay. Yeah. Mr. Ramos-Mrosovsky took you to
23 the Glidepath statement. I believe it was 404. It was
24 at minute 15:45.

05:35:18 25 MR. APPLETON: Why don't we pull up C-404?

05:35:33 1 Q. I'm just remembering this. Can you pull up
2 C-404, please. Because that statement -- can you just
3 search for me the year of 2015, please? I'm just going
4 to point out to you something. There's something in
05:35:34 5 here you agreed with that I need to understand in light
6 of our conversation. You see here --
7 MR. APPLETON: Just stop.
8 Q. You see this second sentence?
9 A. Second sentence of the second paragraph?
05:35:58 10 Q. Yes, it's the first full paragraph with -- it's
11 the second paragraph here.
12 You see there's a date here. It starts
13 "As a trial".
14 A. Yes.
05:36:07 15 Q. So that was taken through -- do you remember
16 Mr. Ramos-Mrosovsky took you through this?
17 A. I --
18 Q. There's been a lot today.
19 A. Yeah.
05:36:18 20 Q. Trust me, that was at around 15:45.
21 And so, here, you see the date that says
22 when it started?
23 A. Started in 2015.
24 Q. And you see your witness statement, that
05:36:31 25 paragraph of your witness statement. Can you tell us

05:36:34 1 which of these is correct? They have two different
2 start dates. I just want to understand.

3 A. 2014 is when they were growing Hass avocado
4 trees, so that is a -- that should have been 2014.

05:36:49 5 Q. So when it says the trial, that's 2014, not
6 2015?

7 A. Right.

8 Q. Okay. I think I just have one more.

9 PRESIDENT: This was corrected already
05:36:59 10 during the cross-examination.

11 MR. APPLETON: I don't believe so. I
12 believe he corrected -- this is a correction to actually
13 his business plan. His witness statement was what he
14 corrected. This is to understand an error in the
05:37:12 15 business plan. We don't get to -- he doesn't get to
16 correct that. That's a document. There was an error in
17 that document. That's what I'm trying to identify. All
18 right. Excuse me a second.

19 So what's the time on that?

05:37:41 20 Q. At 14:01 in the transcript, you were asked a
21 question about whether or not you would have to change
22 the regulation with respect to the importation of Hass
23 avocados in the United States -- Sorry. Sorry.

24 The statement was:

05:37:59 25 "Nicaraguan avocados are banned in the

05:38:02 1 United States, aren't they?"

2 The answer was:

3 "Yes, they are under the regulation."

4 Question: "Because of the Med fly,

05:38:10 5 right?"

6 Answer: "Because of the Med fly."

7 I just want to go back, based on what
8 you've testified today.

9 A. Okay.

05:38:19 10 Q. Are Nicaraguan avocados banned -- is that the
11 right word to use?

12 A. They're not eligible for --

13 MR. RAMOS-MROSOVSKY: I guess I renew my
14 objection to these regulatory questions which we
05:38:33 15 addressed, and Mr. Appleton is again trying to make a
16 regulatory argument he could have made sometime ago
17 through this witness.

18 MR. APPLETON: It's quoted in his
19 statement and he's given testimony and, with all due
05:38:46 20 respect, you've asked that question, and we believe that
21 what you've said is somewhat misleading because you gave
22 the answer, which he's not a lawyer and he gave a legal
23 answer to.

24 MR. RAMOS-MROSOVSKY: It was
05:38:57 25 cross-examination, Mr. Appleton. I asked him if they

05:39:01 1 were banned; he said they were. You are asking what the
2 meaning of "ban" is --

3 MR. APPLETON: I was asking his
4 understanding of the meaning of "banned."

05:39:03 5 MR. RAMOS-MROSOVSKY: And the solution
6 would have been to have had a regulatory expert, which
7 you could have put in.

8 PRESIDENT: Okay. Put your question now,
9 and we see where we are heading with this.

05:39:19 10 Q. First of all, with respect to the record, are
11 avocados in general from Nicaragua banned to the United
12 States?

13 A. Hass avocados, I know, are not -- cannot be
14 imported into the United States. Are they banned?

05:39:38 15 Based on this, I'm not sure of the legal definition of
16 it.

17 Q. So that's different from what you said earlier.

18 And do you know about avocados generally?

19 A. Avocados generally, I am not aware. The Hass
05:39:58 20 avocado is what I'm referring to.

21 Q. Okay. So now we understand your evidence on
22 that.

23 If you give me one moment --

24 MR. RAMOS-MROSOVSKY: I'm not sure I do,
05:40:11 25 but I renew my objection.

05:40:13 1 MR. APPLETON: I believe we're probably
2 done. Just give me 30 seconds.

3 Mr. Welty, I want to thank you for your
4 patience, and I'm going to turn you back over to the
05:40:31 5 Tribunal, who may very well have some questions for you.

6 PRESIDENT: Thank you very much,
7 Mr. Appleton. Any questions?

8 There are no questions from the Tribunal,
9 Mr. Welty. Thank you very much for your time.

05:40:48 10 Appreciate it. You're released.

11 MR. WELTY: Thank you.

12 PRESIDENT: We have 20 valuable minutes
13 left, but it may be too late to start with
14 Ms. Gutiérrez, although that was the hope.

05:41:08 15 This means that tomorrow will be a busy
16 day with three witnesses, so please keep that in mind.

17 MR. APPLETON: Mr. President, do you
18 want -- there's enough time to start the direct, and
19 then you would at least get that process underway while
05:41:25 20 we have everybody here. But the direct is only
21 ten minutes.

22 MS. GONZÁLEZ: Mr. President, our
23 preference would be to start tomorrow, not have
24 Ms. Gutiérrez sequestered tonight just for a very short
05:41:45 25 direct examination.

05:41:49

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MR. APPLETON: We've already had two witnesses sequestered overnight.

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PRESIDENT: Ms. Greenwood reminded all of us of an important point that we completely omitted to mention in the beginning of the hearing today.

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05:42:12

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Happy 4th of July.

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So I think given that we are working on a holiday, I don't think we should insist on the supporting staff to stay longer than necessary. So we'll call it a day and start tomorrow at 9:00.

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05:42:31

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But just to repeat what I started saying, tomorrow will be a busy day. We have three witnesses to examine, and keeping in mind the logistics between switching witnesses, so let's all try to be as efficient as we can tomorrow so that we can complete it and we don't need to sequester any of the witnesses for the weekend. That would not be reasonable.

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05:42:55

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So on that note, thank you very much for your time and enjoy the evening.

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05:43:28

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(Hearing adjourned at 5:43 p.m.)

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<p>MR. APPLETON: [70] 788/11 790/18 790/24 791/7 791/23 792/2 792/23 794/6 794/16 794/24 795/8 795/11 795/18 795/20 796/16 796/18 796/25 797/11 798/22 800/12 801/16 804/4 804/21 805/4 805/9 805/14 806/8 806/13 808/2 808/17 809/3 809/8 809/11 911/1 918/10 920/12 941/16 942/15 943/18 967/3 967/20 972/24 973/2 982/4 982/16 982/21 1002/15 1002/24 1003/8 1005/16 1006/17 1007/1 1010/7 1018/5 1019/17 1020/9 1022/5 1022/10 1025/1 1025/23 1031/7 1031/15 1031/25 1032/7 1033/11 1034/18 1035/3 1036/1 1036/17 1037/1</p> <p>MR. GUTIERREZ: [3] 908/16 908/19 909/1</p> <p>MR. GUTIÉRREZ: [19] 788/3 809/18 827/9 852/14 882/6 885/19 905/16 906/11 906/24 907/15 907/17 908/3 909/10 909/18 909/24 910/3 910/5 910/13 910/22</p> <p>MR. MULLINS: [35] 816/10 816/20 818/6 818/9 825/17 852/17 863/3 863/15 864/7 874/23 875/5 875/17 877/23 878/6 879/9 881/20 884/14 884/20 884/24 885/4 886/14 887/2 887/14 888/11 890/1 891/9 893/4 893/8 893/21 894/15 895/22 896/23 903/21 904/9 905/5</p> <p>MR. RAMOS-MROSOVSKY: [40] 911/7 924/23 931/21 941/25 942/5 943/5 943/20 944/1 944/4 944/17 945/15 945/21 949/23 950/8 952/9 952/15 953/13 954/4 955/7 956/4</p>	<p>963/23 967/15 967/23 968/4 973/1 973/7 973/11 973/14 979/13 982/13 982/18 982/24 986/10 990/2 992/15 1024/16 1034/13 1034/24 1035/5 1035/24</p> <p>MR. WELTY: [13] 911/16 911/19 912/1 912/9 912/12 912/21 918/4 1003/5 1006/25 1016/23 1017/4 1017/22 1036/11</p> <p>MR. ZUNIGA: [48] 809/25 810/12 811/5 812/21 814/11 815/12 817/8 818/8 818/10 819/9 822/22 825/23 827/4 827/14 828/7 828/13 829/11 830/12 830/22 833/13 836/12 837/5 838/12 838/20 839/5 839/16 839/23 840/10 840/17 843/17 843/25 844/6 847/4 847/8 847/11 847/17 848/13 852/12 862/18 863/13 863/17 863/24 874/20 875/2 877/16 888/9 893/18 896/17</p> <p>MS. CONOVER: [4] 822/18 1006/13 1010/4 1010/9</p> <p>MS. GONZÁLEZ: [14] 794/12 796/13 796/17 801/24 803/1 803/3 803/22 806/11 807/9 809/12 844/4 885/13 920/20 1036/22</p> <p>MS. GREENWOOD: [17] 794/22 795/5 795/9 840/21 881/18 881/21 882/8 887/12 905/11 906/7 906/16 907/9 907/16 943/21 944/2 944/9 944/15</p> <p>PRESIDENT: [120] 787/15 788/5 790/17 790/21 791/1 791/15 791/25 792/9 794/4 795/13 795/19 796/21 797/8 798/10 799/24 801/2 802/20 803/2 803/16 803/24 804/20 804/23 805/7 805/11 806/1 807/23 808/12 809/2 809/6 809/9 809/13 809/17 809/20 816/5 816/17 817/3 825/21 826/24 827/5 828/10 839/2 839/13</p>	<p>839/18 840/7 840/15 840/20 847/5 847/10 847/12 847/15 852/15 853/8 862/25 864/2 875/13 877/19 878/4 884/19 884/21 885/1 885/6 885/14 885/22 886/23 887/3 889/24 894/1 905/3 905/8 907/18 908/5 908/18 908/21 909/6 909/14 909/23 909/25 910/4 910/10 910/19 910/24 911/3 911/9 911/12 911/14 911/17 911/20 912/4 912/10 912/13 912/22 918/2 918/5 920/19 920/22 942/2 942/11 943/8 949/19 949/25 950/6 967/25 973/6 973/9 982/23 1002/13 1002/21 1003/1 1003/7 1006/22 1016/19 1017/1 1017/19 1018/3 1025/18 1033/9 1035/8 1036/6 1036/12 1037/3</p> <p>THE INTERPRETER: [3] 857/13 879/6 891/5</p> <p>\$</p> <p>\$1.4 [1] 953/22 \$1.4 million [1] 953/22 \$1.5 [1] 914/19 \$1.5 billion [1] 914/19 \$10 [3] 964/5 974/12 974/23 \$10 million [3] 964/5 974/12 974/23 \$150,000 [1] 999/8 \$16 [3] 946/12 946/15 962/18 \$16 million [3] 946/12 946/15 962/18 \$240,000 [1] 953/19 \$3 [1] 1016/12 \$3,700 [2] 1016/14 1016/17 \$3700 [1] 1015/22 \$5 [2] 948/16 948/18 \$5 million [2] 948/16 948/18 \$7 [1] 973/22 \$7 million [1] 973/22 \$90,000 [2] 1016/13 1016/16</p>	<p>' '20 [1] 1014/12 '21 [1] 1014/12 'third [1] 999/25 'third-party' [1] 999/25</p> <p>0</p> <p>0087 [1] 828/18 01 [1] 830/13 02 [1] 836/13 0365 [1] 844/9 0414 [1] 963/11 0434 [2] 818/17 819/11 0466 [2] 980/23 1022/7 0635 [1] 843/17 0653 [2] 843/16 843/16</p> <p>1</p> <p>1,320 hectares [1] 895/12 1,404 [1] 841/5 1.5 kilometers [2] 881/10 883/21 1.867 [1] 895/11 10 [12] 833/14 844/3 845/5 845/23 902/23 903/18 904/7 914/22 949/21 953/24 954/8 969/18 10 a.m [3] 807/11 808/1 808/3 10 hectares [11] 844/21 845/13 902/23 902/24 902/25 903/14 903/24 904/2 904/4 904/16 904/24 10 million [1] 974/25 10-hectare [2] 904/13 906/20 10.08 [1] 843/11 100 percent [2] 881/6 999/13 1036 [1] 879/21 105 [1] 917/22 108 [1] 889/9 10:00 [1] 807/6 10:30 [2] 808/5 808/13 11 [5] 924/21 924/22 931/22 944/21 1020/8 11 percent [1] 987/11 116 [1] 907/20 11:00 [1] 847/13 12 [5] 888/17 902/19 902/20 902/20 998/14 12 million [2] 953/25 954/8</p>	<p>120 inches [1] 1028/10 1224 hectares [1] 1005/9 12:30 [2] 884/23 885/3 12:45 p.m [1] 808/14 13 [4] 908/10 908/13 908/22 924/6 130,000 [1] 882/20 14 [6] 822/24 823/5 876/20 904/4 904/11 908/2 14 hectares [1] 903/16 14.74 hectares [1] 844/22 14.87 [1] 904/22 14.87 hectares [4] 902/22 903/2 904/5 904/15 144 [1] 908/8 148 [3] 879/14 879/15 879/15 14:01 [1] 1033/20 14:09 [1] 1028/21 14:40 [1] 1004/10 14:43 [1] 1004/22 14:59 [1] 1009/18 14th [2] 876/11 877/4 15 [14] 822/24 823/12 839/4 847/6 847/12 884/17 884/19 884/25 885/2 944/24 949/21 949/25 961/7 1003/1 150 [1] 837/5 15:43 [1] 1014/22 15:45 [2] 1031/24 1032/20 15th [3] 868/22 869/3 869/4 16 [7] 783/11 850/24 851/5 866/15 866/16 872/20 876/6 16,000 [8] 883/9 938/24 940/3 954/15 955/12 1006/9 1007/19 1019/16 160,000 [1] 946/15 16:10 [1] 1019/21 16:50 [1] 1003/2 16th [1] 866/16 17 [8] 866/11 888/17 908/2 908/6 908/12 908/22 909/2 985/10 17,900 [2] 938/25 1006/9 174 [2] 836/13 836/19 17th [4] 869/19</p>
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1	842/20 859/10 903/10 915/3 926/2 926/16 926/19 932/23 933/4 934/10 934/15 935/11 937/21 954/22 965/23 999/2 1004/21 1030/22 1032/3 1032/23 1033/6 2016 [21] 810/6 822/14 824/5 841/7 842/13 851/4 889/19 889/23 890/2 890/4 890/17 890/18 899/23 899/25 948/3 949/5 955/4 979/23 980/21 986/14 987/3 2017 [48] 836/21 838/1 838/17 841/9 841/11 841/20 841/21 842/1 842/4 842/7 842/10 842/14 842/15 842/17 842/21 842/25 845/7 845/12 845/22 846/6 846/23 848/2 902/25 903/14 904/1 905/13 906/10 906/11 934/22 935/11 937/5 939/1 950/20 951/15 955/2 955/4 955/9 955/12 956/6 957/1 957/22 957/25 958/7 960/3 1019/1 1027/24 1028/14 1028/15 2018 [55] 840/14 847/20 848/5 848/7 848/8 848/18 848/24 848/25 850/24 851/5 864/13 866/11 868/13 868/13 868/19 872/20 876/11 876/20 878/2 878/18 882/23 888/21 888/23 889/7 903/19 906/8 906/12 906/14 908/12 908/20 908/22 909/23 959/19 959/21 961/12 961/20 961/25 970/11 972/14 972/16 988/7 988/9 988/15 991/6 992/2 995/20 996/6 999/3 999/10 1001/2 1008/24 1009/6 1012/5 1014/12 1021/18 2019 [6] 878/23 878/23 988/9 996/7 1001/6 1014/12 2021 [7] 877/10 887/21 887/24 888/4 908/10 908/13 908/22 2022 [1] 998/15 2023 [2] 912/6 922/10 2024 [2] 783/15	787/1 215 [3] 838/20 840/21 902/12 22 [1] 979/22 24 [2] 1008/24 1009/5 25 [3] 973/25 991/6 999/22 250 [1] 845/2 250 grams [4] 843/22 844/2 844/3 845/23 263 [3] 833/14 833/17 833/18 26th [1] 951/15 28 [3] 908/8 912/6 1000/13 280,000 [1] 948/19 284 [2] 838/12 838/16 28th [1] 922/10 29 [2] 848/18 848/24	1031/23 1031/25 1032/2 405 [4] 948/2 986/7 986/12 987/2 41 [1] 1001/23 414 [4] 974/3 974/3 974/7 974/11 416 [2] 952/10 952/14 418 [3] 973/7 973/11 973/15 419 [1] 945/16 42 [5] 938/14 943/24 1007/10 1009/10 1009/11 43 [2] 840/2 840/18 431 [1] 848/14 434 [2] 818/8 895/23 44 [2] 918/13 918/14 44.75 [2] 938/21 939/24 44.75 hectares [2] 811/18 835/9 46 [2] 917/12 917/14 466 [1] 979/10 48 [1] 902/21 490,000 [3] 952/23 955/19 955/22 4th [2] 921/2 1037/6	6598 [1] 823/1 66 [1] 917/18 667 [1] 1016/3 691 [1] 888/17 6:00 [1] 885/11
2	2.5 [9] 824/3 824/7 845/22 896/13 896/14 899/18 899/20 899/24 900/12 2.5 kilograms [3] 845/7 846/7 846/22 20 [5] 807/15 846/16 906/1 950/1 1036/12 20 kilograms [6] 837/8 905/14 905/17 906/5 906/5 907/11 20 percent [1] 987/14 20 years [2] 961/7 971/13 20,000 [1] 844/14 20-kilogram [1] 906/23 200-hectare [1] 833/11 2000s [1] 924/4 2001 [1] 924/8 2002 [1] 924/8 2003 [1] 924/8 2004 [1] 925/25 2005 [1] 925/25 2012 [1] 926/8 2013 [2] 926/8 1006/8 2014 [36] 840/14 841/3 841/24 842/1 842/11 842/17 842/19 842/23 844/22 855/20 902/25 903/1 903/10 903/17 938/25 939/1 940/4 940/5 940/6 941/7 941/9 954/25 955/1 955/11 966/17 966/23 968/6 1005/19 1006/3 1006/4 1006/7 1006/8 1031/21 1033/3 1033/4 1033/5 2015 [31] 814/5 814/8 828/25 829/15 829/18 829/20 841/5 841/24 842/4 842/6	3 3 million [1] 969/5 3.75 kilograms [1] 906/19 30 [1] 1036/2 30 days [3] 851/10 852/6 852/6 30,000 kilograms [1] 1016/9 32 [1] 934/25 33 [3] 916/19 916/21 917/10 33 kilometers [1] 909/12 34 [2] 917/12 1000/20 36 [3] 840/17 918/2 918/5 366 [1] 1022/4 39 [1] 840/4	5 5,000 [1] 845/10 5,756 [1] 841/9 5,948 [3] 841/3 904/14 904/16 50 [1] 837/9 50 kilograms [2] 846/17 1016/8 500,000 [2] 973/23 974/14 52 [1] 918/18 55 [1] 998/10 560,000 [1] 955/19 57 [1] 917/16 58 [1] 879/14 59 [1] 918/25 5:43 [1] 1037/20 5th [1] 972/15	7 7 million [2] 952/23 974/25 7 pounds [1] 969/17 7,000 [1] 882/12 700 hectares [5] 948/19 952/24 964/9 969/6 973/23 738 [1] 888/11 789 [2] 810/12 810/19 790 [2] 812/24 814/14 791 [3] 814/11 814/14 815/14
	4 4,000 [4] 844/20 904/17 906/19 907/10 4,792 [1] 841/7 4.87 hectares [1] 903/6 40 [2] 938/21 939/24 40 hectares [1] 883/9 40,000 [1] 844/13 400 [3] 845/13 905/25 906/1 400 hectares [1] 946/16 404 [13] 963/23 988/7 988/7 989/16 1007/5 1008/8 1008/15 1008/23 1009/5 1013/2	6 60 million [1] 964/12 60,000 [5] 838/2 838/18 842/22 904/23 1008/11 600 [3] 974/16 1016/5 1016/7 600,000 [3] 964/9 974/13 974/14 635 [1] 903/21 6396 [1] 818/17 655 [1] 972/17 6597 [1] 819/11	8 8 a.m [3] 807/10 807/11 807/13 8.5.4 [3] 830/22 830/23 831/2 80 [1] 1028/9 80 percent [1] 1017/6 83 [3] 1020/8 1020/11 1020/14 85 percent [1] 964/15 86 [1] 889/10 87 [1] 828/7 898 [1] 888/12 8:30 [3] 807/7 807/20 807/22	
			9 90 percent [1] 1016/18 90-day [1] 830/3 91 [2] 919/17 919/18 93 [2] 919/17 920/5 94 [1] 917/20 9:00 [1] 1037/10	
			A a.m [6] 807/10 807/11 807/11 807/13 808/1 808/3 abandon [2] 872/3 872/14 ability [8] 800/2 802/2 802/3 858/21 859/2 875/9 1016/25 1021/20 ablaze [1] 910/15 able [43] 788/17 788/18 788/21 791/13 793/5 793/19 794/19 794/20 796/8 796/9	

<p>A</p> <p>able... [33] 796/19 796/21 797/3 797/8 798/8 800/9 801/5 801/15 806/19 806/22 807/2 807/3 808/22 839/11 847/23 849/4 881/10 881/13 884/17 884/25 895/2 909/20 921/23 931/17 944/12 967/12 1004/6 1006/19 1007/18 1015/2 1016/10 1016/11 1016/12</p> <p>about [206] 793/10 793/11 793/18 795/12 795/21 795/22 799/1 799/7 799/20 800/14 800/22 802/2 802/4 802/13 803/20 806/20 813/22 814/1 814/5 814/8 820/21 834/16 843/11 843/12 844/24 845/1 854/14 854/16 854/20 855/25 856/2 856/19 856/24 856/25 857/3 858/25 859/17 860/2 860/9 861/11 861/12 861/24 861/25 862/19 862/21 863/5 863/14 863/15 863/25 864/10 864/23 864/25 867/1 868/18 869/20 870/3 870/22 872/4 872/22 873/11 874/15 874/16 874/24 875/10 875/11 875/15 876/3 877/11 877/12 877/14 877/17 877/24 879/12 881/16 882/10 882/11 882/20 883/8 883/14 883/21 884/4 884/5 884/7 884/8 884/12 884/13 885/17 889/4 890/13 893/19 893/22 893/22 893/23 893/24 894/16 894/18 895/7 896/18 896/21 896/25 897/17 897/17 898/9 899/11 902/4 902/5 902/10 908/1 908/21 910/10 914/3 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[17] 1007/14 1009/7 1009/14 1011/1 1012/10 1016/9 1022/24 1023/11 1023/24 1025/13 1026/7 1026/8 1027/12 1033/5 1033/16 1033/17 1035/17</p> <p>their [35] 795/1 797/14 799/5 805/24 831/18 866/8 871/9 872/15 884/2 884/12 887/17 892/25 905/6 926/13 929/11 930/12 930/18 940/21 940/21 951/25 958/11 959/1 974/23 977/21 995/24 998/3 1012/21 1016/24 1017/18 1019/2 1023/25 1024/11 1027/8 1030/1 1031/1</p> <p>them [55] 790/2 790/15 808/11 815/8 836/2 851/24 860/18 862/13 866/4 869/18 870/16 870/16 870/22 871/1 871/16 871/17 874/5 876/4 876/7 882/7 889/18 889/19 889/19 892/14 892/15 903/17 910/16 910/17 910/18 915/10 923/16 929/4 931/19 933/3 937/6 938/5 943/14 952/3 955/25 963/25 974/6 974/22 979/1 984/12 984/21 989/14 1016/20 1019/4 1021/5 1028/3 1028/13 1029/5 1030/8 1030/8 1030/25</p> <p>themselves [6] 847/9 858/17 858/19 863/18 873/13 940/23</p> <p>then [101] 792/1 794/1 794/20 795/2 795/21 797/15 798/17 799/16 800/12 801/6 801/11 806/1 806/23 808/17 810/16 813/4 817/6 824/3 824/8 824/10 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852/6 852/8 855/1 857/19 859/19 860/6 860/21 861/25 863/5 863/22 864/2 864/9 864/9 865/23 865/25 866/7 866/18 868/20 869/5 870/4 871/16 873/11 873/18 873/20 873/22 873/23 874/6 874/10 874/13 874/16 875/5 875/18 875/21 875/22 875/25 877/10 879/21 879/22 880/4 880/7 880/9 880/22 880/24 881/9 881/11 881/12 882/16 884/9 886/7 887/8 887/9 888/16 889/6 890/15 891/23 892/10 893/15</p>	894/6 894/7 894/8 894/12 894/22 894/25 894/25 895/7 895/7 895/19 895/25 896/16 896/24 897/1 897/18 899/6 899/6 899/12 899/21 900/19 901/13 901/19 902/20 902/20 903/4 903/24 904/13 904/16 905/19 907/13 907/20 909/3 912/14 913/8 918/19 922/19 925/3 927/24 930/14 930/14 930/15 931/2 931/15 931/16 931/22 931/24 933/4 933/7 933/24 934/10 935/17 935/25 936/11 936/19 937/18 940/3 940/13 941/20 942/18 942/22 942/23 944/13 944/24 945/23 946/9 947/3 947/8 947/17 947/19 952/11 954/5 954/15 956/1 959/8 965/9 966/17 969/1 969/5 972/8 974/5 976/12 976/14 982/22 983/11 988/5 988/23 994/15 996/12 997/24 998/4 1001/10 1004/16 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[3] 998/20 1005/12 1005/14</p> <p>think [92] 789/17 790/2 790/11 792/23 799/20 801/21 804/5 805/7 806/14 806/16 807/6 816/23 818/7 819/10 825/21 830/23 847/5 847/8 850/22 853/3 853/7 854/25 864/2 864/7 872/21 872/24 874/13 875/7 877/25 879/14 880/16 884/15 884/18 884/20 884/22 884/24 885/4 886/20 887/16 889/9 889/11 897/24 901/23 902/9 905/3 906/16 911/1 922/4 927/21 928/22 931/22 932/10 932/14 933/14 935/2 936/3 936/3 938/8 939/14 939/16 940/24 941/4 943/18 950/10 951/4 951/23 954/2 955/20 958/18 960/10 965/3 967/9 967/18 973/16 975/9 986/21 986/21 988/2 991/13 994/15 995/20 996/15 996/16 997/17 1002/15 1017/15 1017/23 1018/10 1024/17 1033/8 1037/7 1037/8</p> <p>thinking [8] 952/2 967/6 967/8 967/10 967/22 968/1 968/24 976/18</p> <p>third [12] 810/18 811/6 811/9 814/14 820/24 837/10 855/1 893/10 919/20 987/9 998/22 1000/8</p> <p>third-party [1] 1000/8</p> <p>this [406]</p> <p>this session [1] 894/2</p> <p>Thomas [2] 961/5 961/6</p> <p>those [63] 791/21 795/19 796/10 798/12 800/1 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962/9</p> <p>workers [8] 836/1 836/4 898/7 909/4 909/15 909/16 910/1 1030/25</p> <p>working [19] 855/4 855/7 855/19 858/7 859/19 872/19 915/11 925/20 928/2 928/11 931/11 932/6 934/17 960/18 968/2 978/14 1000/7 1021/8 1037/7</p> <p>works [2] 858/15 901/22</p> <p>world [24] 804/17 915/21 915/24 916/16 916/20 917/1 917/23 925/21 929/7 931/13 932/2 957/21 965/22 966/2 966/4 966/11 976/19 976/23 976/24 1015/9 1016/10 1016/24 1028/4 1028/20</p> <p>worry [3] 941/24 1008/5 1012/8</p> <p>worth [3] 956/14 960/11 961/6</p> <p>would [241] 789/13 789/16 790/14 790/22 791/11 791/16 793/21 794/2 801/12 802/19 805/1 805/12 805/16 806/5 806/15 806/17 807/5 807/5 807/25 808/5 808/14 822/8 827/20 831/12 831/14 834/6 836/1 836/1 836/4 836/4 837/19 838/5 841/19 842/12 843/9 843/11 846/17 850/1 860/20 861/18</p>	<p>862/8 862/10 864/20 865/3 865/3 865/5 865/10 865/13 865/14 865/15 865/17 865/17 866/2 866/25 869/3 874/14 874/17 875/25 891/3 891/12 907/10 907/10 909/22 910/14 910/15 910/15 911/23 914/20 916/4 922/22 922/23 923/21 924/9 925/3 927/12 927/17 928/4 928/5 928/6 928/7 928/25 929/11 929/12 929/14 929/14 929/19 929/21 929/22 929/23 930/8 930/16 930/18 930/20 930/21 930/24 931/4 931/6 931/8 932/5 933/1 934/5 934/22 936/11 936/17 940/11 940/13 940/17 942/20 942/21 942/22 942/24 943/18 943/22 944/18 944/21 947/2 947/20 948/22 949/23 950/20 952/1 953/16 953/19 954/8 954/11 954/23 959/3 963/1 963/7 963/10 964/8 964/18 965/8 966/4 966/6 966/19 966/21 966/25 969/8 969/21 970/11 971/8 971/10 971/22 975/10 975/16 976/7 976/20 976/20 977/20 977/23 977/25 978/9 978/12 979/2 981/3 981/13 981/19 981/21 981/25 983/3 983/21 983/24 984/4 984/7 984/16 984/21 984/23 984/24 985/2 985/4 985/17 986/8 986/14 987/4 987/18 987/22 988/14 988/16 990/5 990/16 990/21 991/18 993/21 994/21 994/22 994/23 995/12 995/14 995/23 996/10 996/23 997/2 997/18 997/25 998/3 999/12 1002/13 1002/18 1002/21 1009/13 1009/19 1010/19 1010/21 1014/2 1014/9 1014/11 1016/11 1016/19 1016/24 1017/1 1017/19 1017/22 1018/17 1018/18 1019/11 1020/17 1021/12</p>
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<p>W</p> <p>would... [23] 1021/24 1024/5 1024/8 1024/10 1024/13 1026/18 1026/19 1026/21 1026/23 1026/24 1027/6 1027/21 1028/9 1029/12 1030/18 1030/18 1030/20 1031/5 1033/21 1035/6 1036/19 1036/23 1037/17</p> <p>wouldn't [7] 809/4 879/1 967/9 971/23 991/19 995/13 1029/7</p> <p>wrinkle [1] 804/15</p> <p>write [2] 1000/5 1001/8</p> <p>writing [7] 791/2 791/2 800/24 846/24 983/13 992/1 1006/24</p> <p>written [9] 812/8 871/15 899/23 962/22 970/13 988/14 999/18 1001/7 1001/16</p> <p>wrong [8] 823/3 823/24 898/17 918/18 944/19 972/18 972/22 975/22</p> <p>wrote [11] 822/4 947/10 956/1 967/16 970/24 970/25 971/1 972/1 979/22 989/23 989/23</p>	<p>908/23 909/8 909/17 910/2 910/12 944/25 955/19 962/11 989/1 999/11 1016/17 1028/10 1030/14 1032/3</p> <p>years [41] 812/3 812/4 812/16 812/18 821/17 824/3 824/7 824/11 836/8 837/20 837/22 838/5 841/15 841/16 856/4 856/21 857/16 858/1 861/18 866/10 896/13 896/14 899/18 899/20 899/24 900/12 900/20 908/13 924/6 928/13 957/9 961/7 966/5 966/8 968/19 969/18 971/13 990/22 1014/14 1015/12 1017/24</p> <p>years' [1] 857/7</p> <p>yellow [1] 939/4</p> <p>yes [392]</p> <p>yesterday [9] 788/8 806/10 808/21 810/5 810/10 811/1 816/9 834/15 885/10</p> <p>yesterday's [2] 887/7 887/17</p> <p>yet [6] 797/4 808/24 869/24 877/7 925/13 1015/10</p> <p>yield [13] 820/9 842/13 846/17 846/22 900/2 900/12 900/16 901/7 902/24 905/12 906/18 907/11 1030/1</p> <p>yielded [3] 838/1 842/22 904/17</p> <p>yielding [6] 841/20 842/2 842/5 842/9 842/18 843/1</p> <p>yields [2] 837/8 936/5</p> <p>you [1346]</p> <p>you'd [4] 841/20 975/20 978/3 997/17</p> <p>you'll [4] 792/13 804/13 901/7 947/6</p> <p>you're [50] 794/2 797/5 799/11 824/14 826/15 844/25 845/9 846/24 854/15 860/1 867/16 870/14 876/23 883/18 883/19 891/6 891/7 891/8 902/9 902/15 907/2 907/17 908/1 913/10 916/21 916/24 924/9 941/19 944/13 955/18 963/20 965/4 965/7 967/11 973/25 974/12 989/13</p>	<p>990/4 994/25 997/13 999/15 1005/16 1010/5 1010/12 1010/13 1016/10 1016/16 1026/16 1030/14 1036/10</p> <p>you've [39] 799/21 829/14 830/18 832/9 833/19 835/13 836/6 846/16 854/22 855/25 867/1 870/14 870/22 871/1 907/12 913/11 916/3 919/4 922/3 928/14 931/9 936/22 936/24 938/8 939/11 940/8 941/11 967/5 967/6 982/7 982/9 985/15 990/21 997/11 1000/6 1013/17 1034/8 1034/20 1034/21</p> <p>young [1] 859/12</p> <p>your [275]</p> <p>yours [1] 963/18</p> <p>yourself [9] 839/21 860/2 864/16 872/7 873/2 881/3 932/5 943/12 1031/19</p>		
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