

EXHIBIT C

1 CONFIDENTIAL - WILLIAM DUKER

2 C O N F I D E N T I A L

3 UNITED STATES DISTRICT COURT

4 SOUTHERN DISTRICT OF FLORIDA

5 MIAMI DIVISION

6 CASE NO: 1:18-CV-20818-DPG

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8 PDVSA US LITIGATION TRUST,

9 Plaintiff,

10 v.

11 LUKOIL PAN AMERICAS LLC, et al,

12 Defendants.
13 -----

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16 Videotaped 30(b)(6) Deposition of Algamex, by and through
17 its agent, WILLIAM DUKER, taken by AILSA WILLIAMS, Certified
18 Court Reporter, held at the offices of Regus, Via Properzio,
19 5, Rome, Italy, on 5 July, 2018 at 3:00 p.m

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25 Job No. 144246

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2 representative for the topics listed on the notice
3 marked as Exhibit 12, is that correct?

4 A. Yes.

5 Q. And when we refer to Algamex Limited,
6 are you referring to Algamex Limited Company
7 organized under the laws of Cyprus?

8 A. Algamex was originally created under
9 the laws of Cyprus, but it is transitioning to the
10 Isle of Man, and I am not sure where we are in the
11 transition period.

12 Q. Can you please state for the record
13 the full name for Algamex?

14 A. Algamex Limited.

15 Q. And is it your understanding that
16 there are documents of incorporation for Algamex
17 Limited in Cyprus and then there are also documents
18 of incorporation for an Algamex Limited in the Isle
19 of Man?

20 A. That is correct.

21 Q. And is it correct that it is your
22 intention that those two companies be one company,
23 or am I misstating that?

24 A. The company that was created on the
25 island of Cyprus probably a decade ago is a company

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2 I read this document, was that he was --

3 MR. BOIES: Wait a minute, Bill. Does
4 your understanding of who "the Source" is come from
5 an attorney/client communication? Does it come from
6 a communication from a lawyer?

7 A. No.

8 MR. BOIES: Then you may answer.

9 A. My sense at the time I read this was
10 he was referring to Wilmer Ruperti.

11 Q. And were you having conversations with
12 Wilmer Ruperti about what became the litigation?

13 A. I met Wilmer Ruperti late April
14 or May, in connection with due diligence that I was
15 doing with regard to the litigation, to see whether
16 or not it was a matter that I was prepared to be
17 involved in as an investor, and to help organize
18 a team to prosecute any civil claims that might be
19 revealed. So in the course of my due diligence
20 I did meet Wilmer Ruperti.

21 Q. Is Mr. Ruperti the one who first
22 brought the issues that led the litigation to your
23 attention?

24 A. No.

25 Q. Who first brought the issues that led

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2 up to this litigation to your attention?

3 A. John Brennan.

4 Q. Do you have an understanding of
5 whether John Brennan first discussed the issues that
6 became this litigation with Wilmer Rupert?

7 A. Before John raised this issue with me,
8 which would have been probably in March, I don't
9 know what his contacts were with other people.
10 I know that he dealt directly with -- both he and
11 Alex Pencu would have dealt directly with
12 Vanessa Freedman, from whom they obtained a good
13 deal of evidence that I got a chance to see. I have
14 some understanding now, or subsequent to that, that
15 Wilmer and Vanessa have known each other for some
16 time, but I can't tell you how John got involved in
17 this.

18 Q. So you first heard of the issues that
19 led up to this litigation from John Brennan?

20 A. Correct.

21 Q. And then you understood that John
22 Brennan had -- was it your understanding -- strike
23 that previous question.

24 Is it your understanding that John
25 Brennan's first conversation with anyone about what

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2 A. That someone in Venezuela had been
3 hired? I am sorry, I am not sure I understand the
4 question.

5 Q. Was it your understanding that
6 somebody in Venezuela had hired Mr. Brennan to
7 undertake the investigation he described to you?

8 A. I don't know that anybody hired him.

9 Q. Was it your understanding that he had
10 undertaken the investigation on his own?

11 A. I don't know what that means either.
12 No, he was not doing it on his own. Alex Pencu was
13 involved in it.

14 Q. What was the reason for the
15 investigation, or who asked Mr. Brennan, if anybody,
16 to undertake the investigation, to your
17 understanding?

18 A. You will have to ask him.

19 MR. BOIES: Before answering that
20 question, Mr. Duker, if whatever understanding you
21 have comes from a lawyer --

22 A. I don't have an understanding one way
23 or the other.

24 MR. BOIES: Okay. That makes it easy.

25 Q. When you first discussed -- when you

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2 had the conversation you just described to us with
3 Mr. Brennan, where he described to you this
4 investigation that he had undertaken, did he
5 represent to you that he was calling you on behalf
6 of anyone other than himself?

7 A. No, he did not.

8 Q. Did you understand that he was calling
9 you on behalf of himself, as an individual who had
10 undertaken this investigation?

11 A. My understanding was that he thought
12 he had an opportunity but didn't know what to do
13 with it.

14 Q. When he described to you an
15 opportunity, what type of opportunity are you
16 referring to?

17 A. He had the opportunity to reveal the
18 kind of corrupt behavior that I described to you,
19 and to assist a woman, Vanessa Freedman, who was, at
20 least as he described it, in danger, who wanted to
21 bring a proceeding in the divorce courts of Miami
22 because the documents that she found had revealed to
23 her that her husband had misled her about the size
24 of his estate at the time she signed a pre-nup
25 agreement. She believed that she was not yet

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2 divorced officially, and wanted to challenge
3 a pre-nup agreement because instead of him being
4 worth \$14 million, which is what she was told at the
5 time of the pre-nup and what was disclosed in the
6 pre-nup, it seemed he was worth hundreds of millions
7 of dollars, if not billions.

8 Q. And did you understand that he was
9 talking to you to see if you could help finance one
10 or more of these potential litigations?

11 A. No, that was not the initial purpose
12 of his conversation with me. The initial purpose of
13 his conversation with me was really to get my
14 insight into what, if anything, could be done, and
15 did I have any ideas about a variety of things; what
16 law firms could represent her, what law firms might
17 be interested in the documents more generally,
18 whether or not I had ideas for how to finance such
19 a litigation, because obviously the wealth of the
20 defendants was daunting. He recognized that this
21 would be a very expensive litigation to pursue. So
22 he just initially I think came to me to see if I had
23 any thoughts about how I could help, if I knew
24 others who could be helpful.

25 Q. Did he mention to you, during that

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2 Q. Is there any obligation, other than
3 something that is in the Trust Agreement, that
4 Algamex has to provide funding for the litigation?

5 A. No. Are you asking me whether or not
6 we are funding things away from the litigation, away
7 from the parties doing the litigation?

8 Q. No. The question is -- the original
9 question was what obligations does Algamex have,
10 either to advance funds, costs or expenses related
11 to this case.

12 A. Yes. Yes, we are going to do that.

13 Q. But what obligation does it have?

14 A. What I answered was it has those
15 obligations that are in the Trust Agreement that you
16 have. It has an obligation to support the
17 litigation financially, with respect to the expenses
18 of the litigation.

19 Q. And what I am trying to understand is,
20 is that obligation that you are referring to solely
21 found in the Trust Agreement?

22 A. The only obligation that is not found
23 in the Trust Agreement is the obligation that
24 I accepted and provided to John Brennan's group.
25 That is not in the trust agreement, but it was an

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CERTIFICATE OF COURT REPORTER

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4 I, AILSA WILLIAMS, an Accredited LiveNote Reporter,

5 hereby certify that William Duker was duly sworn,

6 that I took the Stenograph notes of the foregoing

7 deposition and that the transcript thereof is a true

8 and accurate record transcribed to the best of my

9 skill and ability. I further certify that I am

10 neither counsel for, related to, nor employed by any

11 of the parties to the action in which the deposition

12 was taken, and that I am not a relative or employee

13 of any attorney or counsel employed by the parties

14 hereto, nor financially or otherwise interested in

15 the outcome of the action.

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21 Signed:

22 AILSA WILLIAMS

23 Dated: July 6, 2018

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