

EXHIBIT 18

REDACTED

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

BROIDY CAPITAL MANAGEMENT LLC and ELLIOTT
BROIDY,

Plaintiff,

Case No.: 18-cv-02421

v.

STATE OF QATAR, STONINGTON STRATEGIES LLC,
NICOLAS D. MUZIN, GLOBAL RISK ADVISORS LLC,
KEVIN CHALKER, DAVID MARK POWELL, MOHAMMED
BIN HAMAD BIN KHALIFA AL THANI, AHMED
AL-RUMAIHI, and DOES 1-10,

Defendants.

CONFIDENTIAL ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF
JOSEPH ALLAHAM
TUESDAY, JUNE 19, 2018
9:00 a.m.

MAGNA LEGAL SERVICES
320 West 37th Street, 12th Floor
New York, New York 10018
(866)624-6221

Reported by: Adrienne M. Mignano, RPR

Job Number: 411069

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June 19, 2018
9:00 a.m.
New York, New York

CONFIDENTIAL ATTORNEYS' EYES ONLY
Videotaped Deposition of JOSEPH ALLAHAM,
held at the offices of Boies Schiller &
Flexner, 575 Lexington Avenue, New York, New
York, pursuant to Notice, before Adrienne M.
Mignano, a Notary Public of the State of New
York.

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2 A P P E A R A N C E S:

3

4 BOIES SCHILLER & FLEXNER LLP

5 Attorneys for Plaintiffs

6 575 Lexington Avenue

7 New York, New York 10022

8 BY: LEE WOLOSKY, ESQ.

SAMUEL KLEINER, ESQ.

9 SCOTT GLASS, ESQ.

ROBERT J. DWYER, ESQ.

10

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ARENTE FOX LLP

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Attorneys for Joseph Allaham

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New York, New York 10019

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BY: TEMITOPE K. YUSUF, ESQ.

16 MOHAMMED FAROOQUI, ESQ.

17

18 COVINGTON & BURLING LLP

19 Attorneys for Defendant - State of Qatar

20 620 Eighth Avenue

21 New York, New York 10018

22 BY: MARK P. GIMBEL, ESQ.

23 KATHERINE PULLEY ONYSHKO, ESQ.

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APPEARANCES (Continued)

WILMER CUTLER PICKERING HALE AND DOOR LLP

Attorneys for Defendants - Global Risk
Advisors and Kevin Chalker

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Attorneys for Defendants - Stonington and
Nick Muzin

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BY: STEPHEN OBERMEIER, ESQ.

A L S O P R E S E N T :

RUDOLFO DURAN
Legal Video Specialist

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THE VIDEOGRAPHER: This is the start of media labeled number one of the video recorded deposition of Joseph Allaham in the matter, Broidy Capital Management LLC, et al versus State of Qatar, et al, in the United States District Court for the central district of California.

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This deposition is being held at Boies Schiller & Flexner, LLP, located at 575 Lexington Avenue, New York, New York on June 19, 2018 at approximately 9:08 a.m..

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19

My name is Rudolfo Duran. I'm the legal video specialist. The court reporter is Adrienne Mignano, and we're both in association with Magna Legal Services.

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21

Will counsel please introduce themselves.

22

23

24

MR. WOLOSKY: Lee Wolosky, Boies Schiller and Flexner for Elliott Broidy and Broidy Capital Management.

25

MR. KLEINER: Samuel Kleiner,

1

2 Boies Schiller & Flexner.

3 MR. GLASS: Scott Glass, Boies
4 Schiller & Flexner.

5 MR. DWYER: Robert J. Dwyer,
6 Boies Schiller & Flexner.

7 MR. OBERMEIER: Stephen
8 Obermeier, Wiley Rein on behalf of
9 Stonington and Nick Muzin.

10 MR. MCGUIRE: Brendan McGuire
11 from Wilmer Hale for Global Risk
12 Advisors and Kevin Chalker.

13 MR. GIMBEL: Mark Gimbel of
14 Covington & Burling for the State of
15 Qatar.

16 MS. ONYSHKO: Katherine Pulley
17 Onyshko, Covington & Burling.

18 MR. FAROOQUI: Mohammed Farooqui
19 from Arent Fox on behalf of Joseph
20 Allaham.

21 MS. YUSUF: Temitope Yusuf from
22 Arent Fox, LLP for Joey Allaham.

23 MR. ALLAHAM: Joey Allaham.

24

25

1 Allaham - ATTORNEYS' EYES ONLY
2 J O S E P H A L L A H A M, called as a
3 witness, having been duly sworn
4 by a Notary Public, was examined and
5 testified as follows:

6 EXAMINATION BY

7 MR. WOLOSKY:

8 Q Good morning, Mr. Allaham.

9 MR. GIMBEL: I think to start
10 out, Counsel wanted to put some
11 statements on the record. I know
12 Mr. Obermeier did, and I would like to
13 do so for my client.

14 So on behalf of the State of
15 Qatar, I would like to say that the
16 State of Qatar objects to this
17 deposition as an intrusion on its
18 sovereign immunity.

19 Qatar will be filing a motion to
20 dismiss, asking that all claims
21 against it be dismissed. The court
22 lacks subject matter jurisdiction
23 against Qatar in the Foreign Sovereign
24 Immunities Act.

25 For the reasons that are set

1 Allaham - ATTORNEYS' EYES ONLY
2 forth in Qatar's pending motion to
3 stay discovery, Qatar objects to any
4 further discovery, including this
5 deposition, until such time as the
6 District Court has ruled on the
7 forthcoming motion to dismiss and the
8 threshold issue of sovereign immunity.

9 The State of Qatar objects to
10 any examination of Mr. Allaham or any
11 use of documents, to the extent it
12 involves materials that are protected
13 by the Vienna Conventions Consular and
14 Diplomatic Relations, as stated by Mr.
15 Allaham in his Foreign Agent
16 Registration Act filings. He
17 conducted work on behalf of the State
18 of Qatar, and in conjunction and as a
19 consultant to the State of Qatar,
20 documents and testimony relating to
21 his work fall within the Act and
22 protections of the Vienna Conventions.

23 The last point I would like to
24 make on the record, simply because I'm
25 not sure I saw it on the transcript at

1 Allaham - ATTORNEYS' EYES ONLY
2 the outset is, this entire transcript
3 should be designated "Attorneys' Eyes
4 Only" provisionally. And I believe
5 that there is an agreement by the
6 parties on that point.

7 MR. OBERMEIER: The Stonington
8 defendants also object to the
9 deposition taking place at this time.
10 It is premature for all of the reasons
11 stated in our stay motion, including
12 the Court lacks personal jurisdiction
13 over the Stonington defendants.

14 Stonington defendants are immune
15 from suit, and Mr. Broidy has failed
16 to state a claim. We will be moving
17 to dismiss on all of those grounds.
18 The Court, as I said, lacks personal
19 jurisdiction over the Stonington
20 defendants.

21 By appearing here today, I am
22 not waiving personal
23 jurisdiction objections on behalf of
24 Stonington defendants. I'm here only
25 to protect my clients' right, to the

1 Allaham - ATTORNEYS' EYES ONLY
2 extent they become an issue.

3 Stonington defendants reserve
4 all rights and defenses, including the
5 right to call Mr. Allaham again, if
6 the case proceeds, if necessary.

7 MS. YUSUF: I would just add
8 that as agreed to prior to getting on
9 the record, all parties agree that
10 this will be provisionally designated
11 as "Attorneys' Eyes Only". And if I
12 can just get confirmation from
13 plaintiff's counsel that that is the
14 case?

15 MR. WOLOSKY: Yes, we agree.

16 MR. GIMBEL: For the State of
17 Qatar, hearing Mr. Obermeier's
18 statement, I feel the need to add, we
19 also do not waive any of our
20 objections and immunities and reserve
21 all rights.

22 MR. MCGUIRE: Global Risk
23 Advisors and Kevin Chalker join in
24 those objections. We also object that
25 the deposition is premature at this

1 Allaham - ATTORNEYS' EYES ONLY
2 time, and that similarly as with what
3 Mr. Obermeier stated, the Global Risk
4 Advisors and Kevin Chalker are
5 similarly going to move to dismiss the
6 case on the grounds articulated by Mr.
7 Obermeier.

8 We are not waving our personal
9 jurisdiction or other arguments by
10 appearing here. We're merely here to
11 ensure that our clients' rights are
12 noticed, and we will -- obviously, we
13 will reserve those rights and move
14 accordingly pursuant to the Court's
15 schedule.

16 EXAMINATION BY

17 MR. WOLOSKY:

18 Q Good morning, Mr. Allaham.

19 A Call me Joey. My grandfather
20 was Mister.

21 Q State your name and address.

22 A Joseph Allaham, 114 East 71st
23 Street, New York, New York 10021.

24 Q Is that a residential or
25 business address?

1 Allaham - ATTORNEYS' EYES ONLY

2 A Residential.

3 Q And do you have a business
4 address that you currently use?

5 A No.

6 Q Did you at one point use 550
7 Madison Avenue as a business address?

8 A Yes.

9 Q And for what businesses did you
10 use that as your business address?

11 A Hospitality.

12 Q What are some of the businesses
13 that you ran from that address?

14 A Prime Grill.

15 Q I should start by saying or
16 asking you to make sure that you
17 understand that you are under oath today
18 and that you must testify truthfully?

19 A Okay.

20 Q Are you aware of any reason why
21 the State of Qatar would not want you to
22 testify truthfully today?

23 A Say that again.

24 Q The State of Qatar made remarks
25 at the outset of this deposition.

1 Allaham - ATTORNEYS' EYES ONLY

2 Are you aware of any reason why
3 the State of Qatar would not want you to
4 testify today?

5 MR. GIMBEL: I'm going to
6 object. There is no good faith basis
7 for that question and it's
8 argumentative.

9 BY MR. WOLOSKY:

10 Q You can answer the question.

11 A I'm not aware.

12 Q Are you aware of any reason why
13 Stonington Strategies would not want you
14 to testify today?

15 A I'm not aware, no.

16 Q Are you aware of any reasons why
17 Global Risk Advisors would not want you to
18 testify today?

19 A No.

20 Q Okay.

21 During the course of this
22 deposition, I'll ask you questions and you
23 can answer them. Please make your answers
24 clear so the court reporter can take them
25 down.

1 Allaham - ATTORNEYS' EYES ONLY

2 If I ask you a question that you
3 believe is unclear, please ask me to
4 clarify it and I'll try to do so; and
5 please wait until I finish my question so
6 that the court reporter can take down your
7 answer.

8 If you need a break at any time
9 just let us know, but please answer the
10 pending question and we can take a break.

11 A Sure.

12 Q Have you ever met Elliott
13 Broidy?

14 A Just now, a second ago.

15 Q In 2017 is there any reason for
16 you to have felt ill will towards
17 Mr. Broidy?

18 MS. YUSUF: Object to the form.
19 What is ill will?

20 Q You can answer the question.

21 A I don't understand. What do you
22 mean by ill will?

23 Q 2017, is there any reason for
24 you to have had a grudge towards
25 Mr. Broidy?

1 Allaham - ATTORNEYS' EYES ONLY

2 A No.

3 Q Where were you born,

4 Mr. Allaham?

5 A In Damascus.

6 Q Damascus is the capital of

7 Syria, correct?

8 A Syria.

9 Q When did you move to the United
10 States?

11 A Around early '90s.

12 Q And what countries are you
13 currently a citizen of?

14 A United States.

15 Q Do you maintain Syrian
16 citizenship at this point in time?

17 A No.

18 Q Did you attend any university?

19 A No.

20 Q Do you have formal training in
21 the hospitality business?

22 A No.

23 Q How about in real estate?

24 A No.

25 Q In accounting?

1 Allaham - ATTORNEYS' EYES ONLY

2 A No.

3 Q In international affairs?

4 A Say that again. Meaning in
5 terms of --

6 Q Do you have formal training in
7 international affairs?

8 A How do you define training?

9 Q At a university.

10 A No.

11 Q What languages do you speak
12 fluently?

13 A Arabic, English and managing
14 Hebrew.

15 Q I'd like to show you an exhibit
16 that -- a document that has been marked
17 for identification as Allaham Exhibit 3.

18 It is an article published by
19 Politico on June 7, 2018.

20 (Whereupon, Article published in
21 Politico, was marked as Allaham
22 Exhibit 3 for identification, as of
23 this date.)

24 BY MR. WOLOSKY:

25 Q Have you seen that article

1 Allaham - ATTORNEYS' EYES ONLY

2 before?

3 A Yes.

4 Q You see in the second paragraph
5 the article states that you had "Recently
6 cut ties with the country," which is a
7 reference to Qatar.

8 Do you see that, Mr. Allaham?

9 A Yes.

10 Q Then the article quotes you as
11 saying, "Qatar enjoys portraying
12 themselves as the purveyor of peace in the
13 region, but this could not be further from
14 the truth."

15 Do you see that?

16 A Yes.

17 Q Did you make that statement?

18 A I did not personally make that
19 statement, no.

20 Q But is that a statement that you
21 agreed would be attributed to you?

22 A I think it was prepared by an
23 assistant of mine and she submitted it.

24 Q And do you agree with that
25 statement?

1 Allaham - ATTORNEYS' EYES ONLY

2 A I mean, what do you mean by
3 agreeing with that statement?

4 Q This is a statement that the
5 article attributes to you. Either you
6 agree with it or you do not agree with it.

7 A I think at that moment I was
8 not -- how do I say -- reading the full
9 statement that it was done on my behalf,
10 so I happen to say I have -- it was a
11 statement that was made on my behalf.

12 Q So you wouldn't disassociate
13 yourself from that statement?

14 A No.

15 Q You didn't call or have someone
16 call Politico to say, I never said that?

17 A No.

18 Q So what did you mean by saying,
19 "Nothing could be further from the truth?"

20 MS. YUSUF: Objection.

21 Mr. Allaham just said that it wasn't
22 him, it was his assistant.

23 MR. GIMBEL: I join in that
24 objection.

25 BY MR. WOLOSKY:

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Do you believe that Qatar is a
3 purveyor of peace in the region?

4 A I don't think I can speak for
5 Qatar. It is not my position.

6 Q I'm only asking you to speak to
7 a statement that was given to Politico on
8 your behalf, to which you did not make any
9 objection to Politico after it was
10 attributed to you.

11 A So say your question again.

12 Q Do you believe that Qatar is a
13 purveyor of peace in the region?

14 A I think Qatar is -- it's hard
15 for me to answer that question. It's --
16 that day or the day before an event
17 happened that I was unhappy about, and was
18 translated my dissatisfaction with that
19 event.

20 Q And what was the event that made
21 you unhappy around the time of this
22 article?

23 A The meeting of Emir with
24 al-Qaradawi was something that we were
25 against.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Can you explain that further?

3 A The -- how would you like me to
4 explain it; in what terms?

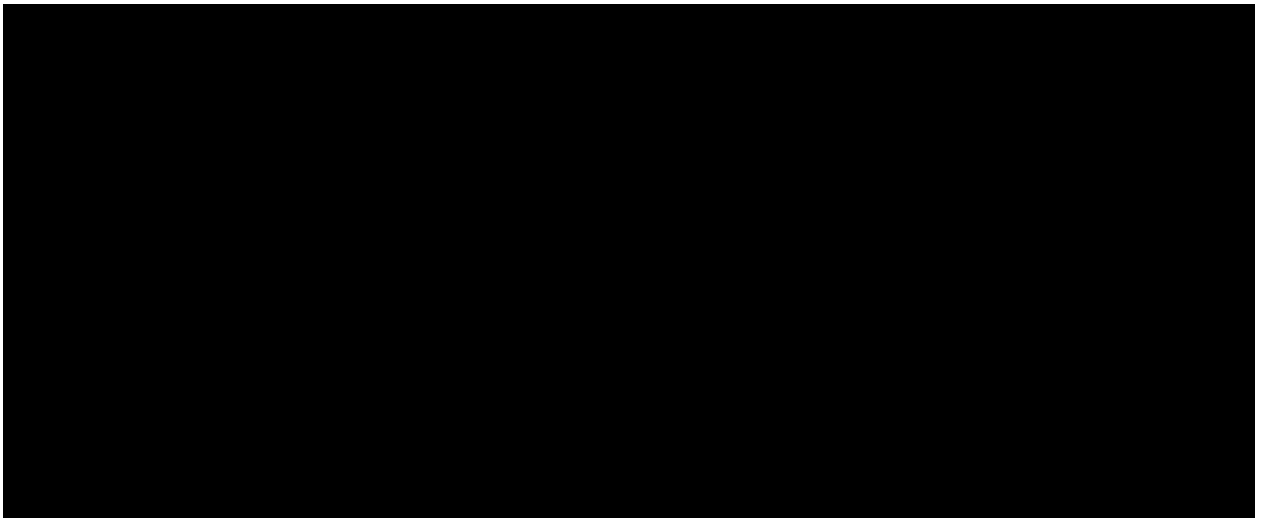
5 Q Could you say who Qaradawi is?

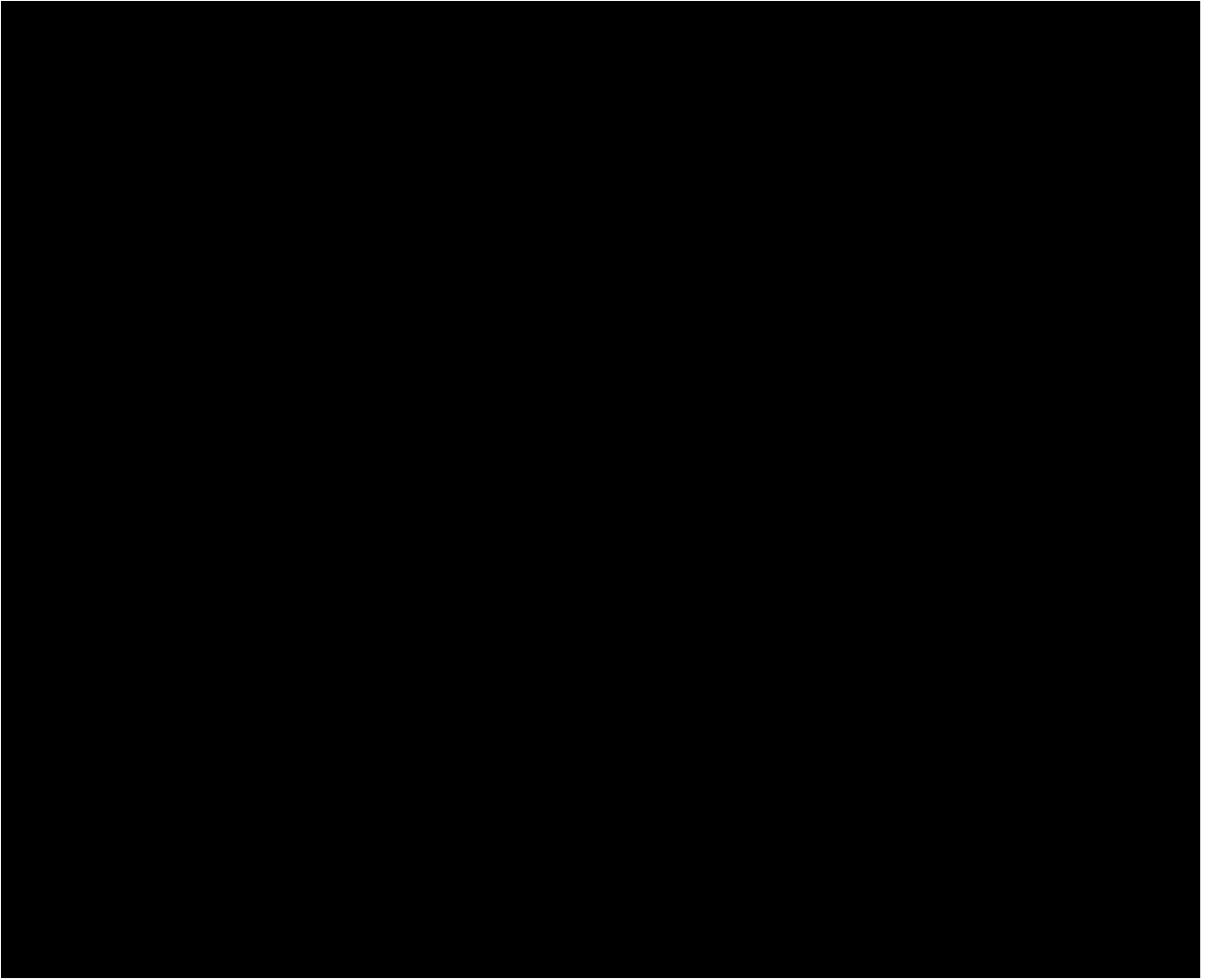
6 A I mean, all of the Jewish
7 leaders who I brought to Qatar raised that
8 issue with that person that's -- and to
9 make sure that that's -- I'm not
10 associated with that person and the people
11 I brought in are not associated with.

12 So that's really the
13 dissatisfaction of that.

14 Q And as of the date of that
15 article, June 7th, did you have any other
16 reasons to be angry at Qatar?

17 A No.





16 Q I'd like to show you a document
17 that has been marked for identification as
18 Allaham 5. Exhibit 5.

19 (Whereupon, Document Bates
20 stamped PROOD00000024 through 60, was
21 marked as Allaham Exhibit 5 for
22 identification, as of this date.)

23 BY MR. WOLOSKY:

24 Q These documents are series of
25 WhatsApp messages involving you. They are

1 Allaham - ATTORNEYS' EYES ONLY
2 Bates stamped PROD00000024 to 60, and we
3 obtained these documents from your
4 counsel.

5 Now, you'll see that these
6 WhatsApp messages involve phone number
7 917-570-6132.

8 That is your phone number,
9 correct?

10 A Correct.

11 Q Now, you also see that these
12 messages involve someone named Jamal.

13 Would that be Jamal Benomar?

14 MS. YUSUF: Counsel, can you
15 point to where you're referring to
16 when you say these messages?

17 Q The second message, January 19,
18 2018 at 5:01 a.m. refers to Jamal. The
19 second message, February 7, 2018, 6 a.m.
20 refers to Jamal.

21 MR. GIMBEL: I'm going to state
22 on the record that this is obviously
23 30 pages or so of text messages. I'm
24 not intimately familiar with the
25 content of them, but to the extent

1 Allaham - ATTORNEYS' EYES ONLY
2 that they contain any kind of
3 communication that would be subject to
4 the Vienna Conventions, we object to
5 the use of this document.

6 BY MR. WOLOSKY:

7 Q Do you see, Mr. Allaham, the
8 references to Jamal?

9 A Yes.

10 Q Is that Jamal Benomar?

11 A Yes.

12 Q And who is Jamal Benomar?

13 A He is an ally. He is a friend
14 of the trusted man for the Qatar, I would
15 say.

16 Q Who is the trusted man that
17 you're referring to?

18 A Jamal. You just asked.

19 Q He is a trusted friend to which
20 Qataris? The Qatar leadership you're
21 referring to?

22 A Yes.

23 Q And how do you know him, Jamal?

24 A I've known him for many years.

25 Q Did you know him when he was an

1 Allaham - ATTORNEYS' EYES ONLY

2 official at the United Nations?

3 A Yes.

4 Q Is he currently an official at
5 the United Nations?

6 A I don't know. You would have to
7 ask him.

8 Q Do you know if he was an
9 official at the United Nations in 2017?

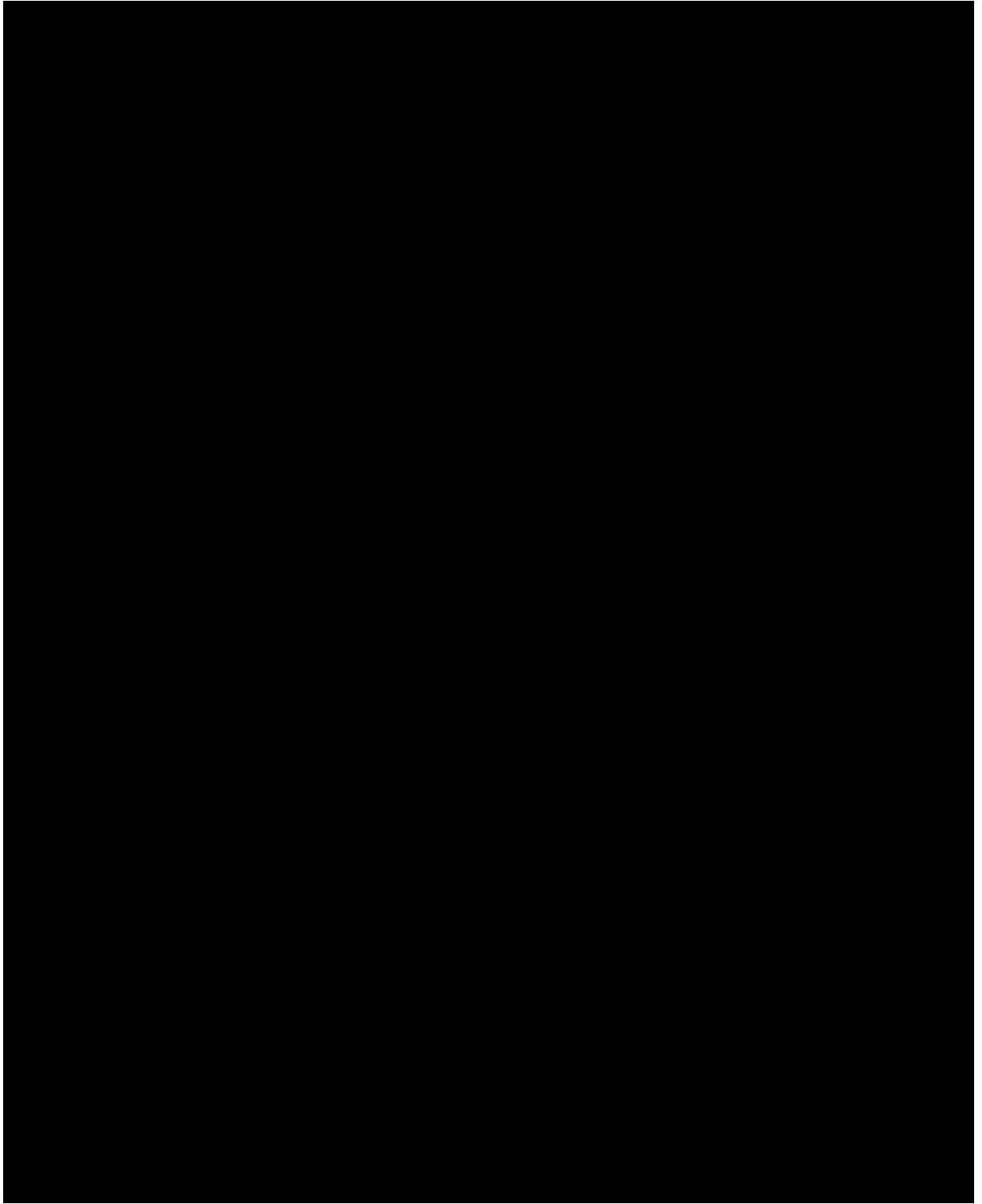
10 A I don't know, no.

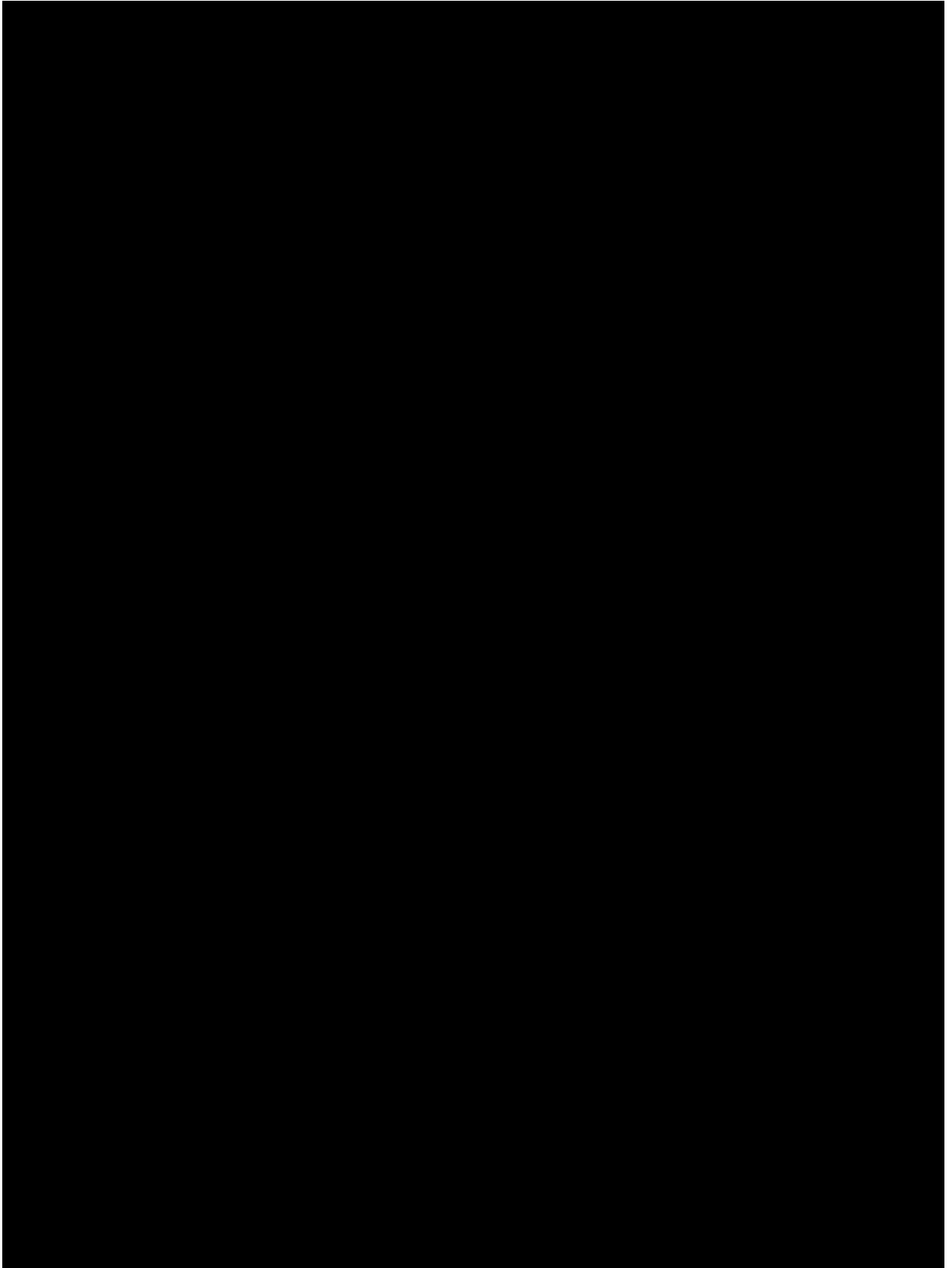
11 Q Please take a moment to review
12 these e-mail -- or excuse me, these
13 WhatsApp messages, which appear to reflect
14 a dispute that you were having with Jamal.

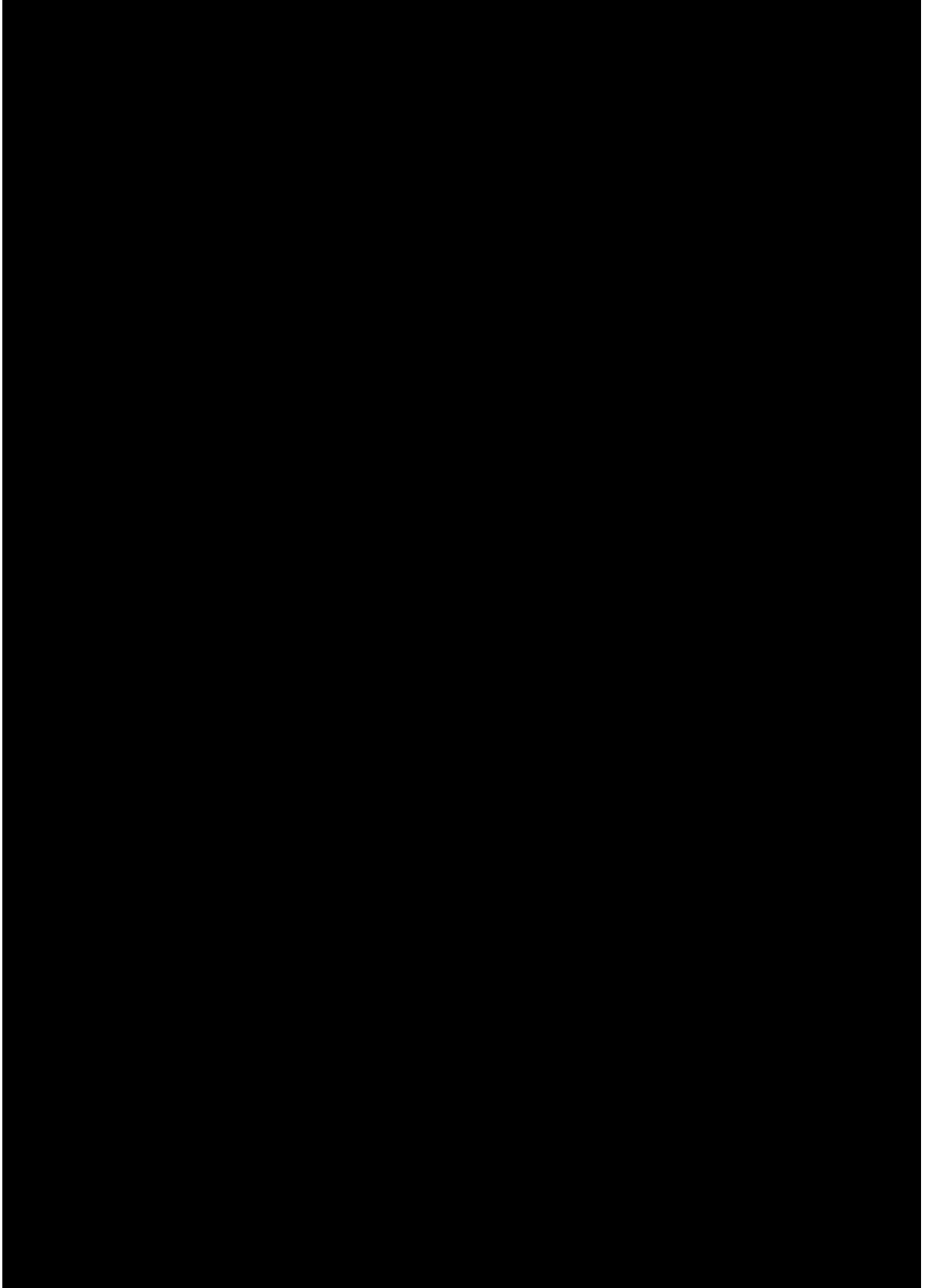
15 MS. YUSUF: Again, Counsel, you
16 handed him 30 pages or so. Which
17 messages specifically? Do you want
18 him to review the whole packet or are
19 there specific messages you want him
20 to look at?

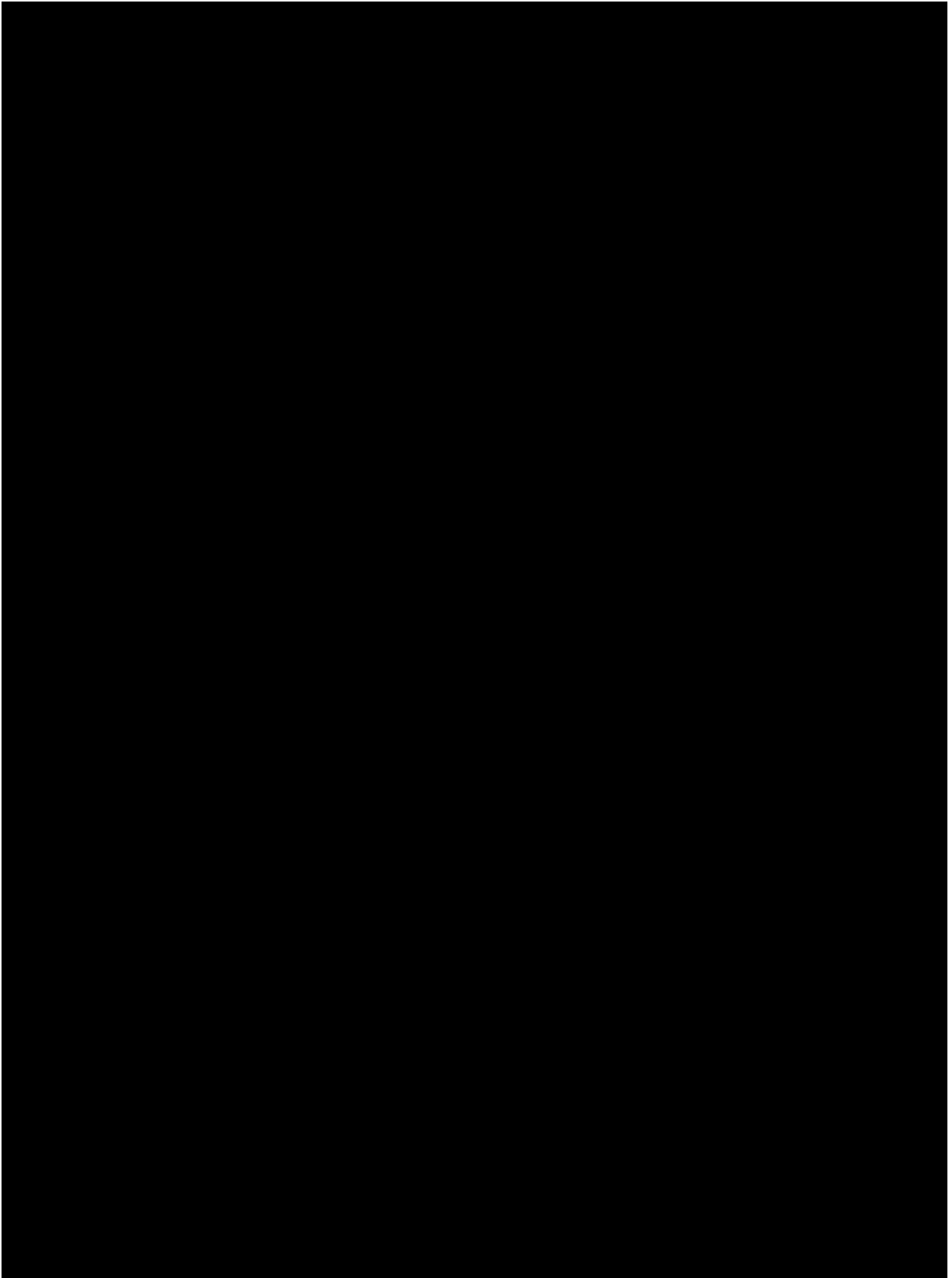
21 MR. WOLOSKY: I would like for
22 him to take a look at the first page,
23 PROD00000024, and I have already
24 indicated the messages on the record
25 that contain the name Jamal.

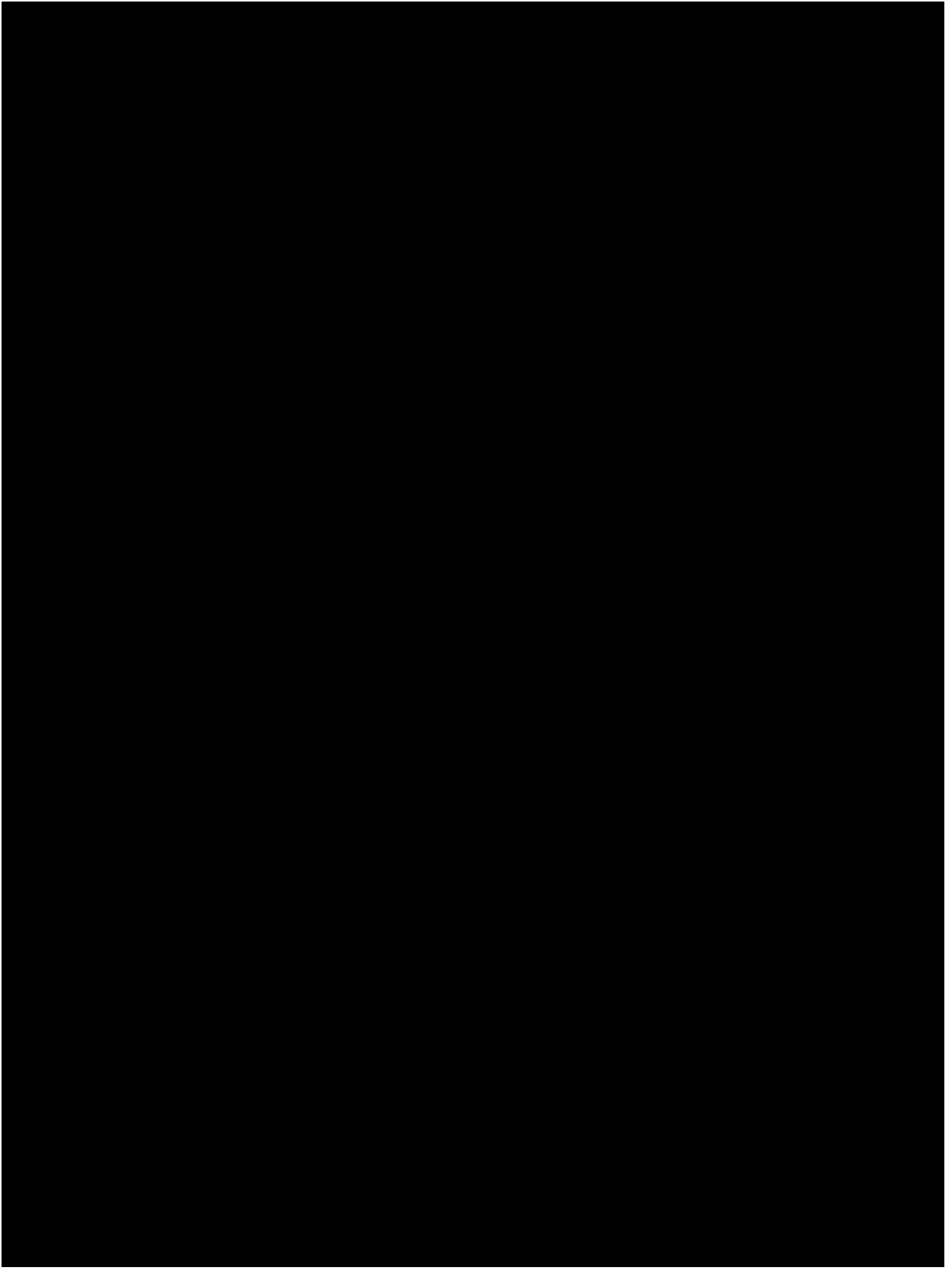
1 Allaham - ATTORNEYS' EYES ONLY
2 BY MR. WOLOSKY:

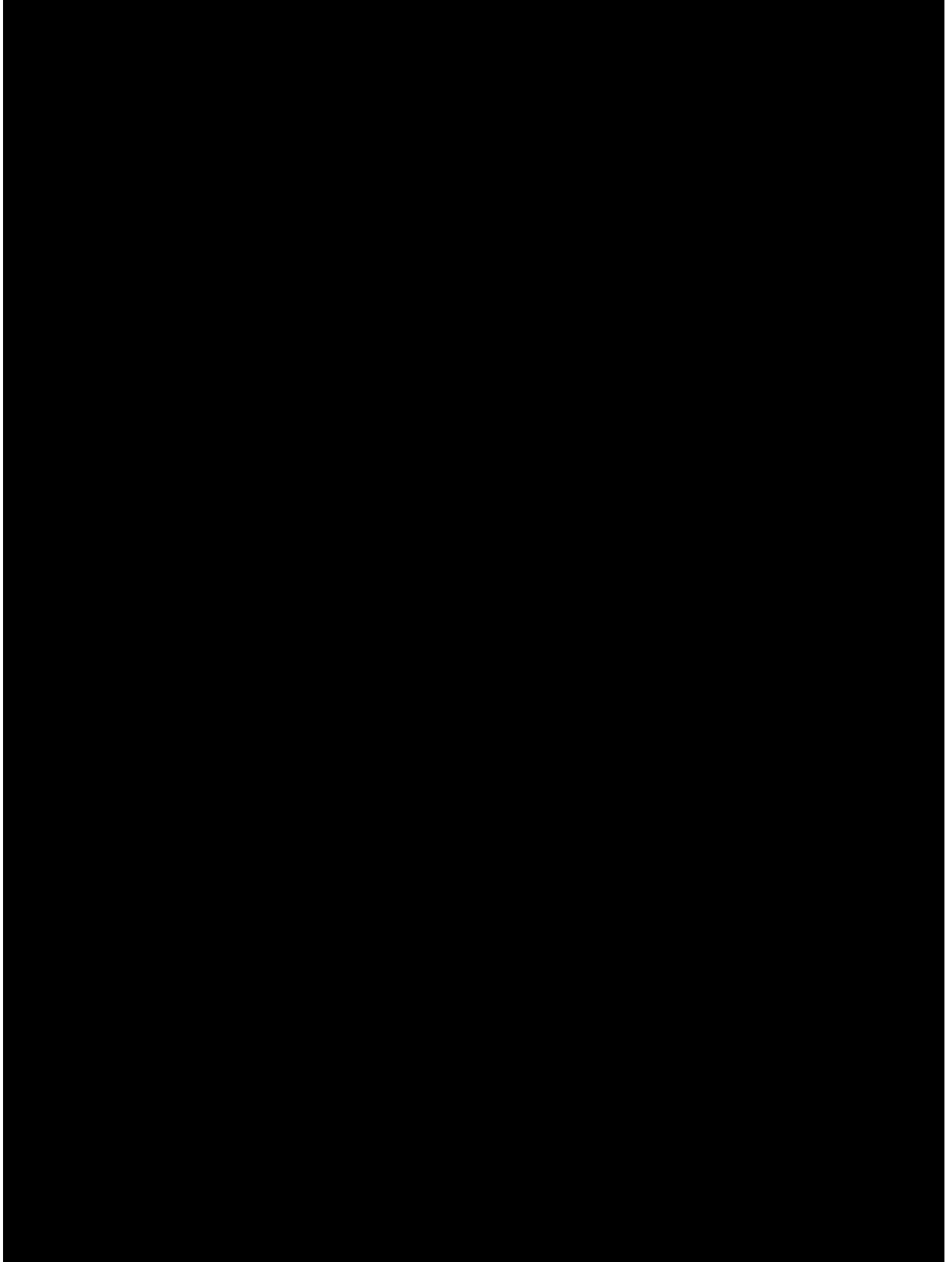


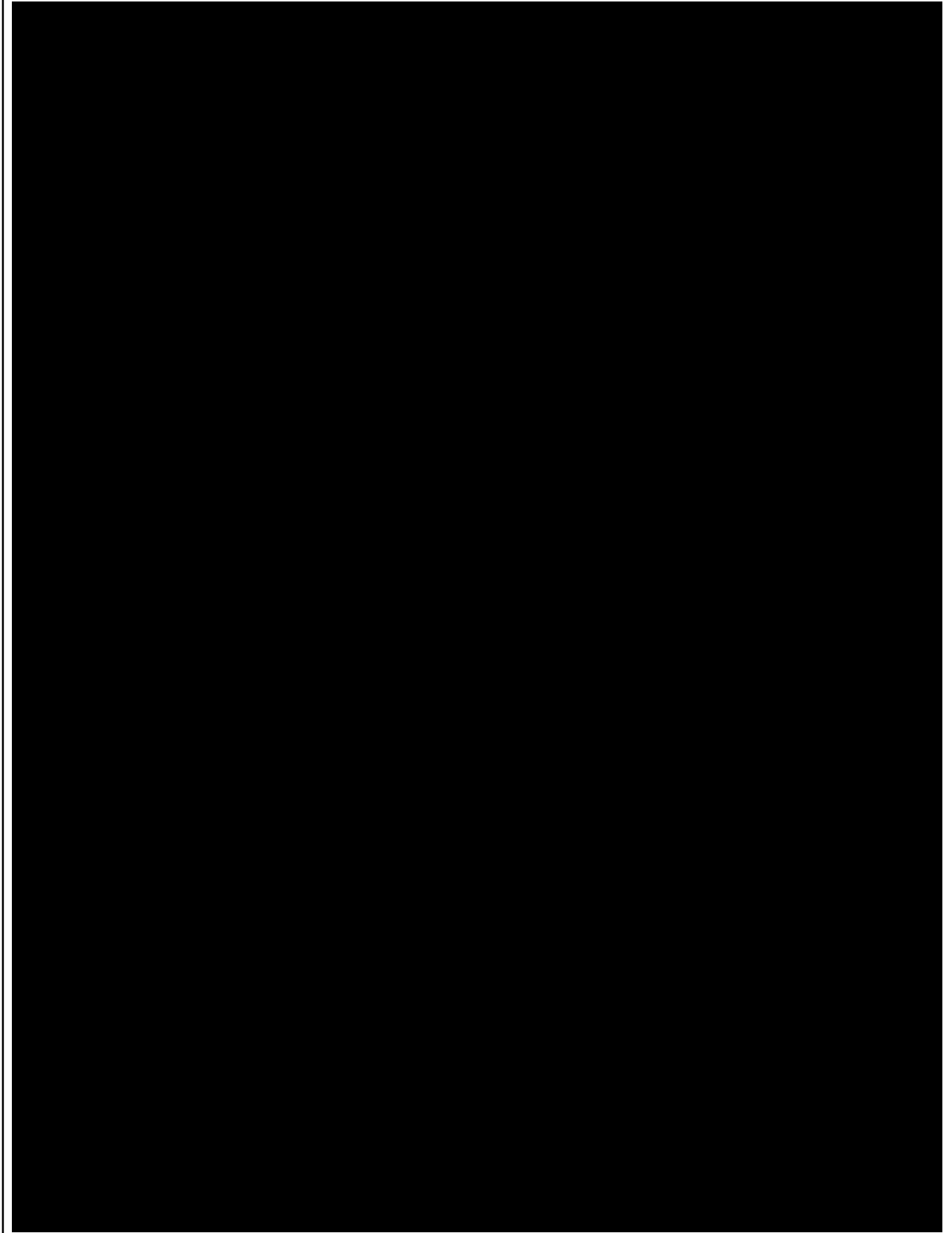


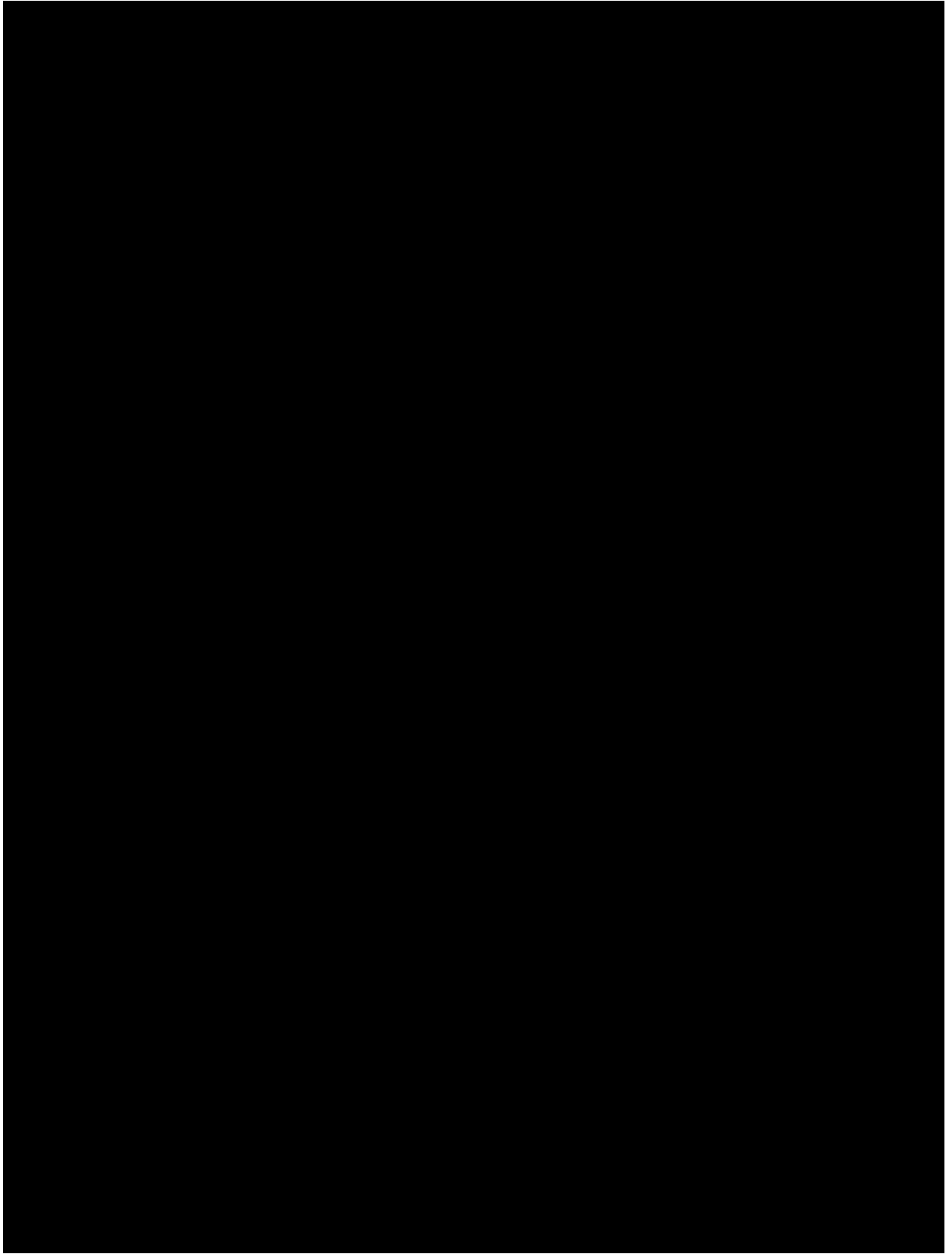


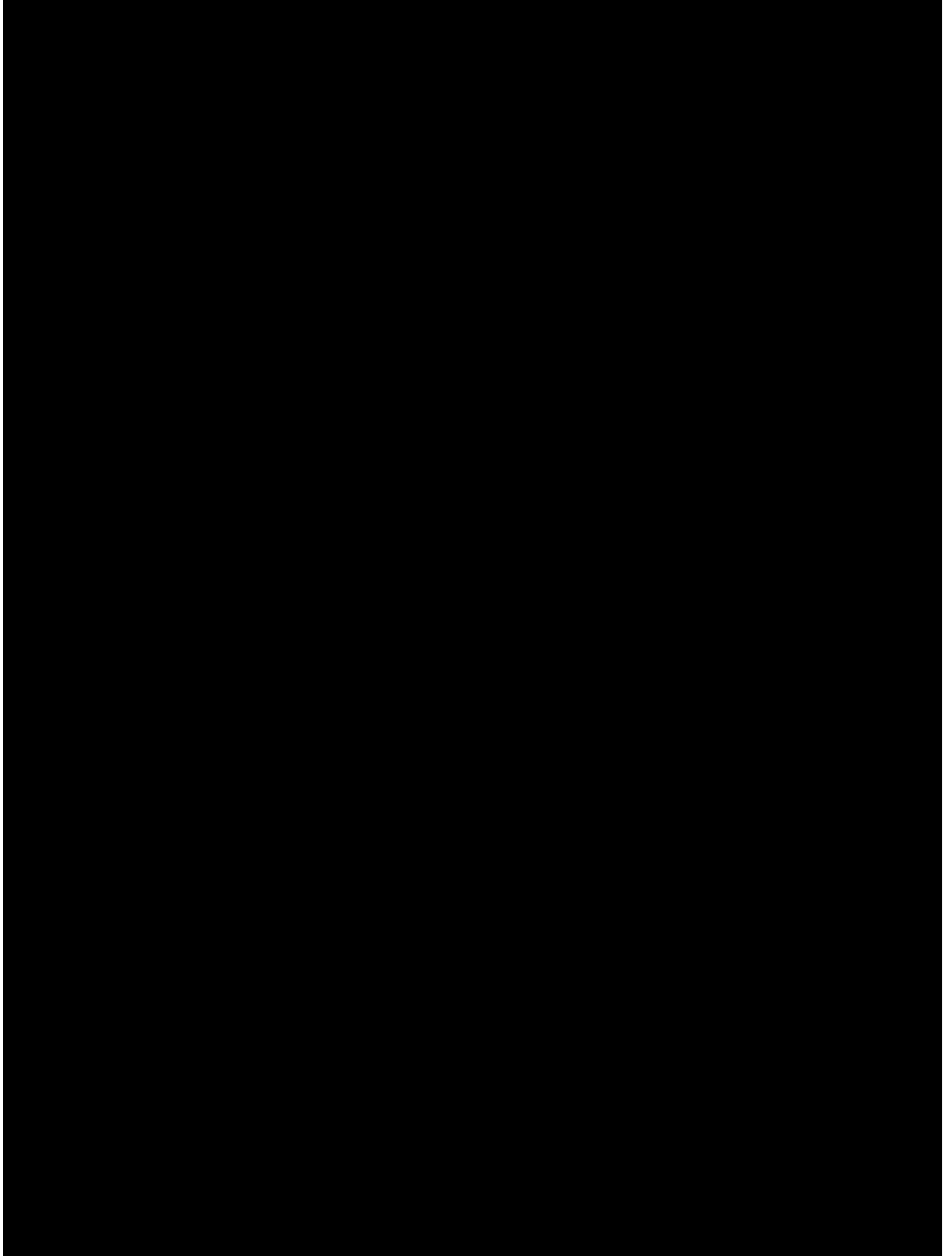


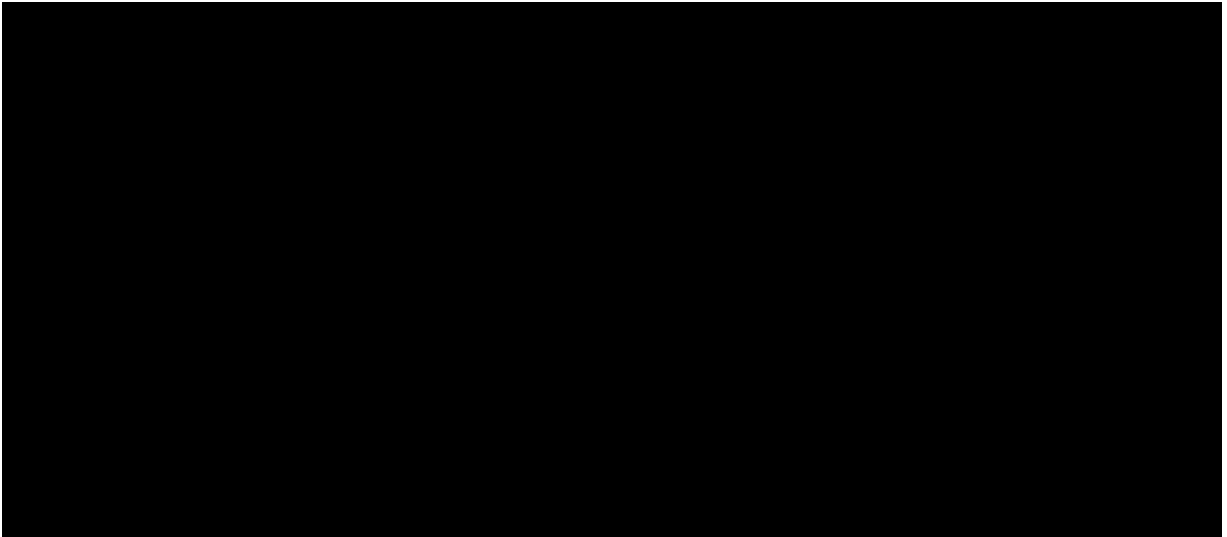












9 Do you see you sent a text
10 message, WhatsApp message on March 26,
11 2018. It says, "My lawyers is not a
12 litigator who he met with me five month
13 ago and still can't resolve it, getting
14 the run around, and I have Dershowitz and
15 Huckabee contracts ongoing."

16 What are the Dershowitz and
17 Huckabee contracts that you had ongoing?

18 A I mean, I work with them. I'm a
19 business person.

20 Q Was that in relation to the work
21 you were doing with Qatar?

22 A No, not Qatar. Abroad. I mean,
23 I was --

24 Q What was the nature of the work
25 you were doing with Dershowitz and

1 Allaham - ATTORNEYS' EYES ONLY

2 Huckabee?

3 MS. YUSUF: Objection. Compound
4 question.

5 Q You can answer it.

6 A I mean, I work with them in many
7 matters that involved Middle East,
8 especially Israel. Many places. Advisory
9 and consulting.

10 Q And are these -- do you have a
11 written contract with Alan Dershowitz?

12 A Yes.

13 Q And what are the terms of that
14 contract?

15 A I cannot recall that right off
16 the top of my head.

17 Q Do you know how much you paid
18 Alan Dershowitz?

19 MS. YUSUF: Objection. Assumes
20 facts not in evidence.

21 A I mean, I will not answer that
22 question. He is my lawyer and it is
23 something -- it is client.

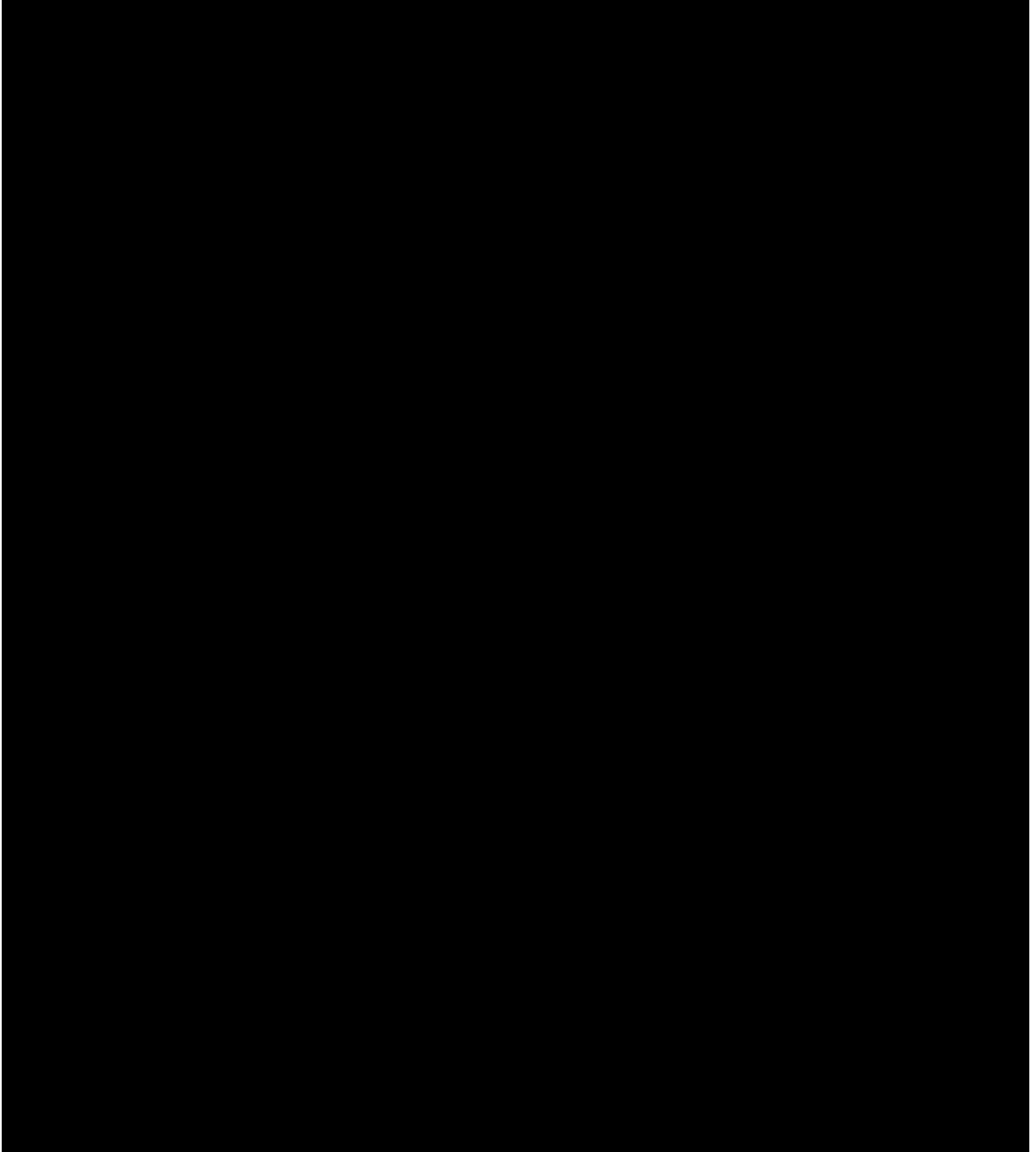
24 Q So your contract with Alan
25 Dershowitz is one for legal services that

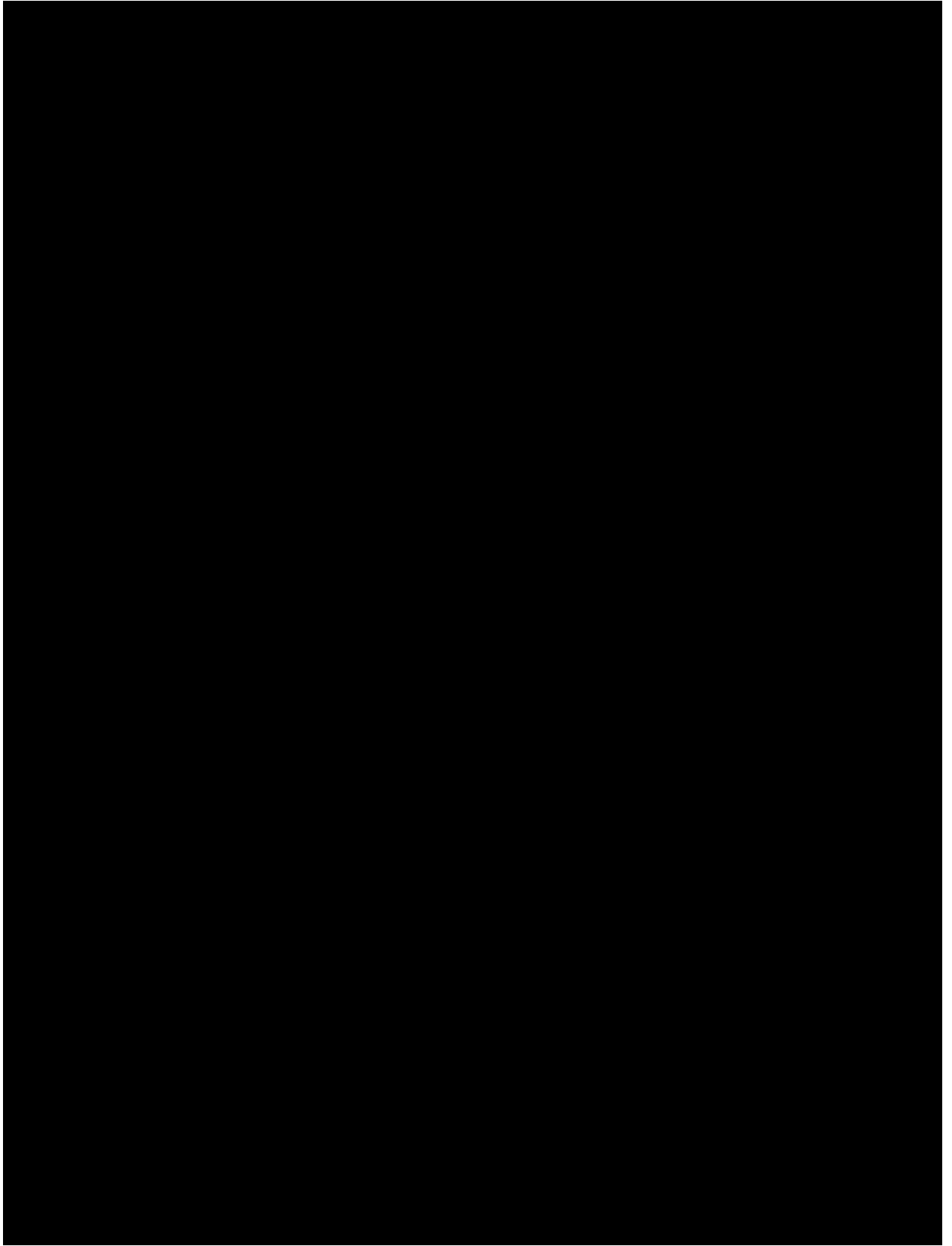
1 Allaham - ATTORNEYS' EYES ONLY

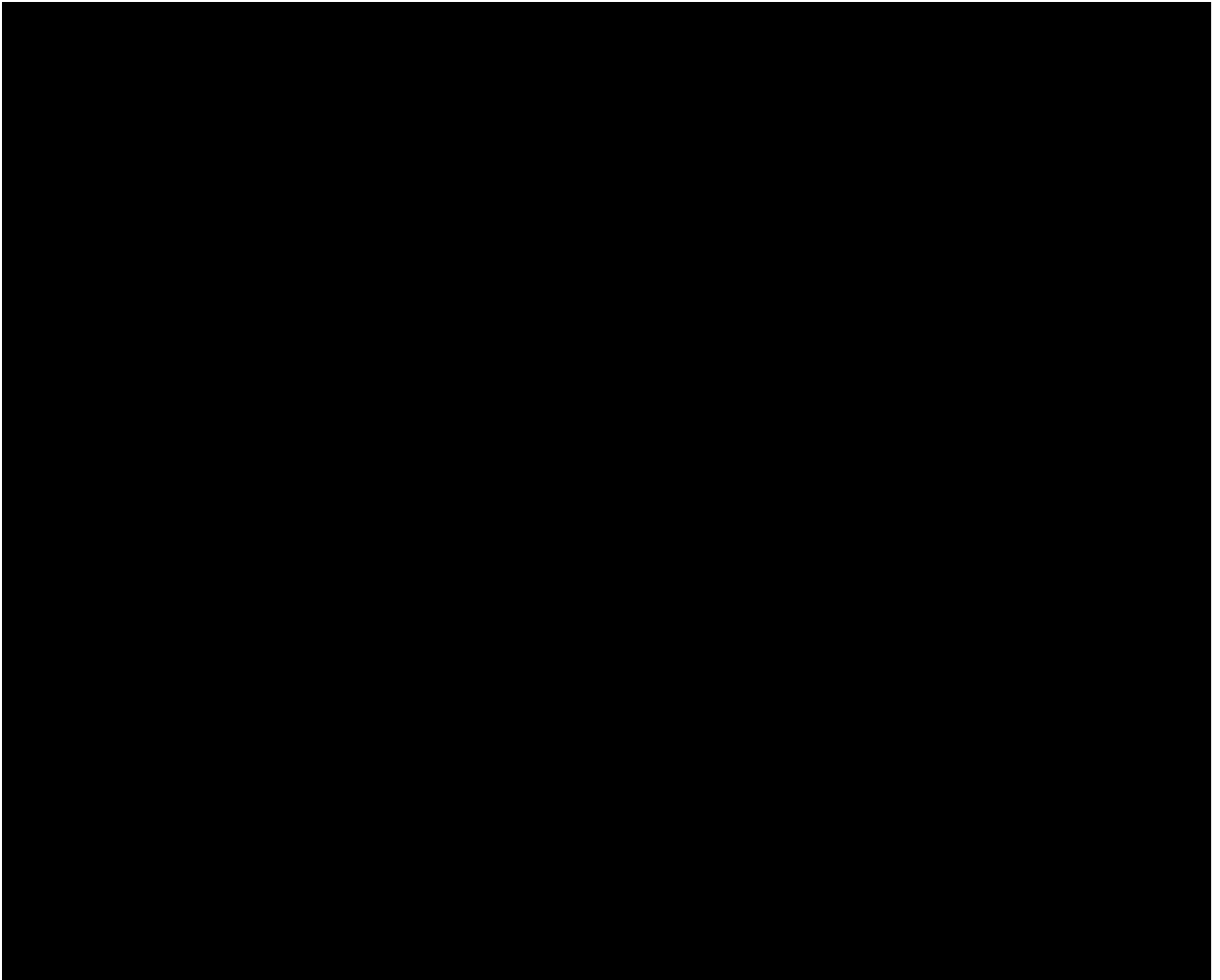
2 he provides to you?

3 A Legal services, advisory and

4 consulting.







16 MS. YUSUF: Attorney. Calls for
17 attorney-client privilege information.

18 Don't answer it.

19 MR. DWYER: Are you following
20 your counsel's instruction not to
21 answer that question?

22 THE WITNESS: Yes. She would
23 fire me.

24 BY MR. WOLOSKY:

25 Q Can you go to the next page.

1 Allaham - ATTORNEYS' EYES ONLY

2 I'm going to shorten the reference and
3 just say Bates marked page 25.

4 Do you see you sent a text
5 message to Mr. Benomar on March 4, 2018
6 that concerns Mueller's Focus on Adviser
7 to UAE.

8 Do you see that?

9 A Yes.

10 Q Now, if you turn to the next
11 page, you'll see additional messages that
12 you sent to Mr. Benomar on March 4th,
13 March 5th.

14 Now, why were you sending
15 messages to Mr. Benomar after you gave him
16 notice in February?

17 A I mean, what happened, if I
18 recall, since we were trying to resolve
19 our dispute between us was an ongoing
20 conversation.

21 Q Did Mr. Benomar respond to your
22 WhatsApp messages?

23 A I don't --

24 Q In the normal course?

25 MS. YUSUF: Objection.

1 Allaham - ATTORNEYS' EYES ONLY

2 Are you referring to these
3 specific messages or just in life?

4 MR. WOLOSKY: I'm referring to
5 these specific messages, March 4th and
6 March 5th that are reflected on the
7 documents Bates stamped 25 and 26.

8 A I see whatever I'm looking at.
9 I don't see any response from him.

10 Q I see if you skip to page Bates
11 stamped 27.

12 A Yes.

13 Q I see one response from
14 Mr. Benomar on March 5, 2018 at 6:51 p.m.
15 it says, "just now."

16 Do you see that?

17 MS. YUSUF: Objection to the
18 characterization that this is a
19 response from Mr. Benomar. The
20 document speaks for itself and it says
21 "Joey" next to it, and so it appears
22 to be a message sent by Mr. Allaham.

23 MR. GIMBEL: Join in that
24 objection.

25 BY MR. WOLOSKY:

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Please skip to the document
3 Bates stamped number 38.

4 Please direct your attention to
5 the second, third and fourth messages --
6 excuse me, second, third and fifth
7 messages on that page, dated March 13th.

8 Can you take a moment to read
9 those?

10 A Yes, go ahead.

11 Q Now, this is a series of
12 messages that you and Mr. Muzin exchanged
13 regarding the theft of Mr. Broidy's
14 e-mails?

15 MS. YUSUF: Objection to the
16 characterization. The messages speak
17 for themselves.

18 MR. GIMBEL: Join in that
19 objection.

20 BY MR. WOLOSKY:

21 Q You wrote, "Tried to get the
22 e-mails. That what I think he was doing
23 there. Reviewing. He had it right before
24 MBS comes." Then --

25 MS. YUSUF: Objection. It says,

1 Allaham - ATTORNEYS' EYES ONLY

2 "he did it" not "he had it."

3 BY MR. WOLOSKY:

4 Q Now, then Mr. Muzin responds,
5 "Why would they need Jamal to review
6 e-mails?"

7 Do you know who the they -- I'm
8 sorry, first, who is the "he"? Is the
9 "he" referring to Jamal Benomar?

10 A I'm not sure. I mean, I don't
11 know with who the conversation was going.

12 Q Okay.

13 To your knowledge, was
14 Mr. Benomar -- did you believe that
15 Mr. Benomar was in Qatar reviewing
16 Mr. Broidy's e-mails as these messages
17 seem to suggest?

18 MS. YUSUF: Objection to the
19 characterization. That's what you
20 believe they suggest. I don't think
21 Mr. Allaham has said they suggest
22 that.

23 MR. GIMBEL: I join in that
24 objection.

25 MR. WOLOSKY: Can you re-read

1 Allaham - ATTORNEYS' EYES ONLY

2 the question, please.

3 (Record read)

4 A I think -- I don't really
5 remember if he was there or not, but based
6 on the time. But the e-mails were coming
7 out publicly, so everyone was reading
8 those e-mails.

9 Q But you believe it is plausible
10 that that's what he was doing in Mr. --
11 that's what Mr. Benomar was doing in Qatar
12 "reviewing" them?

13 MS. YUSUF: Objection. Calls
14 for speculation.

15 MR. GIMBEL: Join in that
16 objection. Misstates his testimony.

17 A I can't speak for what he was
18 doing.

19 Q You think it is possible?

20 MS. YUSUF: Objection. Calls
21 for speculation. Anything is
22 possible.

23 MR. GIMBEL: I join in that
24 objection.

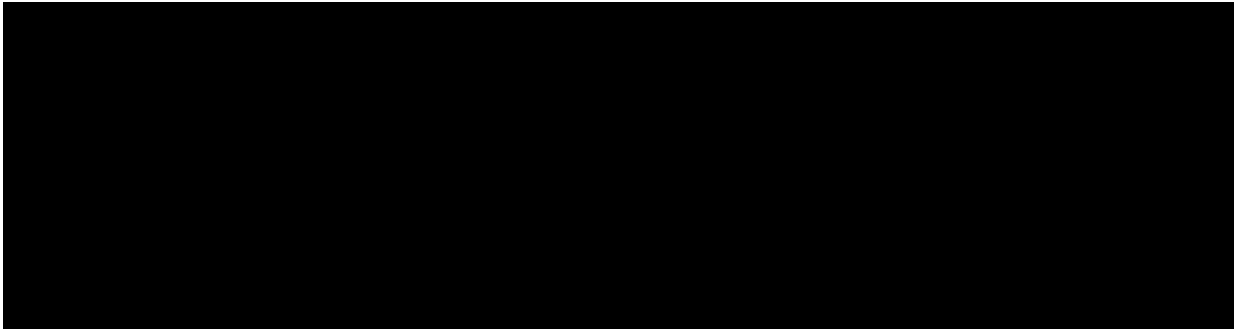
25 A Everyone was reading those

1 Allaham - ATTORNEYS' EYES ONLY
2 e-mails. They were hot.

3 Q Why do you think it's possible
4 that Mr. Benomar would be in Qatar
5 reviewing Mr. Broidy's e-mails?

6 MS. YUSUF: Objection.

7 Misstates his testimony.



13 Q Did you read the e-mails?

14 A Some. The ones I was able to --
15 whatever was in articles.

16 Q Did you read e-mails that were
17 not in the articles?

18 A Never.

19 Q Did Mr. Muzin, to your
20 knowledge, read e-mails that were not in
21 the articles?

22 A I can't speak for Nick.

23 Q Did you ever discuss with
24 Mr. Muzin his review of e-mails that were
25 not in articles?

1 Allaham - ATTORNEYS' EYES ONLY

2 MR. GIMBEL: Objection. Assumes
3 facts not in evidence.

4 A I think for the credit of Nick,
5 which is I will only state that my opinion
6 not -- he was bombarded from reporters
7 that wanted to speak with him. And all of
8 these reporters had all claimed had leaked
9 e-mails, and they all wanted to speak with
10 Nick to just comment on the e-mails.



16 Q Now, can I direct your attention
17 to WhatsApp message that Mr. Muzin sent to
18 you on March 13th at 5:31 p.m.?

19 A Yes.

20 Q It says, "It's cool that in
21 e-mails Broidy references Royce."

22 I'm assuming -- which I'm
23 assuming is a reference to the Chairman of
24 the House of Foreign Affairs Committee, Ed
25 Royce?

1 Allaham - ATTORNEYS' EYES ONLY

2 A Yes.

3 Q Do you know how Mr. Muzin knew
4 what was in those e-mails?

5 MS. YUSUF: Objection. Can you
6 restate your question?

7 MR. WOLOSKY: Can you read back
8 the question.

9 (Record read)

10 A Again, what I stated, whatever
11 reporters were sending him.

12 Q Do you know that reporters sent
13 to him e-mails concerning Mr. Royce?

14 A I'm not sure. But I mean, it
15 states here some of the e-mails
16 referencing Royce.

17 Q Now, the message immediately
18 above that is a message from you to Muzin
19 that reads, "I'm sure he" -- referring to
20 Jamal -- "took the credit."

21 What is that you believe Jamal
22 took the credit for?

23 A I have to --

24 Q Did Jamal take the credit for
25 the hack of Mr. Broidy's e-mails?

1 Allaham - ATTORNEYS' EYES ONLY

2 A No.

3 Q Did you ever discuss with Jamal
4 the hack of Mr. Broidy's e-mails?

5 A Never.

6 Q Can you flip to the next page.

7 This is the document that's
8 Bates stamped number 39. There is a text
9 message that you send to Nick Muzin on
10 March 18, 2018. It says, "I keep on
11 thinking to use Ben Brafman for Jamal."

12 Do you see that?

13 A Yes.

14 Q Why was it that you believed
15 that Jamal needed a criminal lawyer?

16 MS. YUSUF: Objection. Assumes
17 facts not in evidence. I don't think
18 that this says that Jamal needs a
19 criminal lawyer.

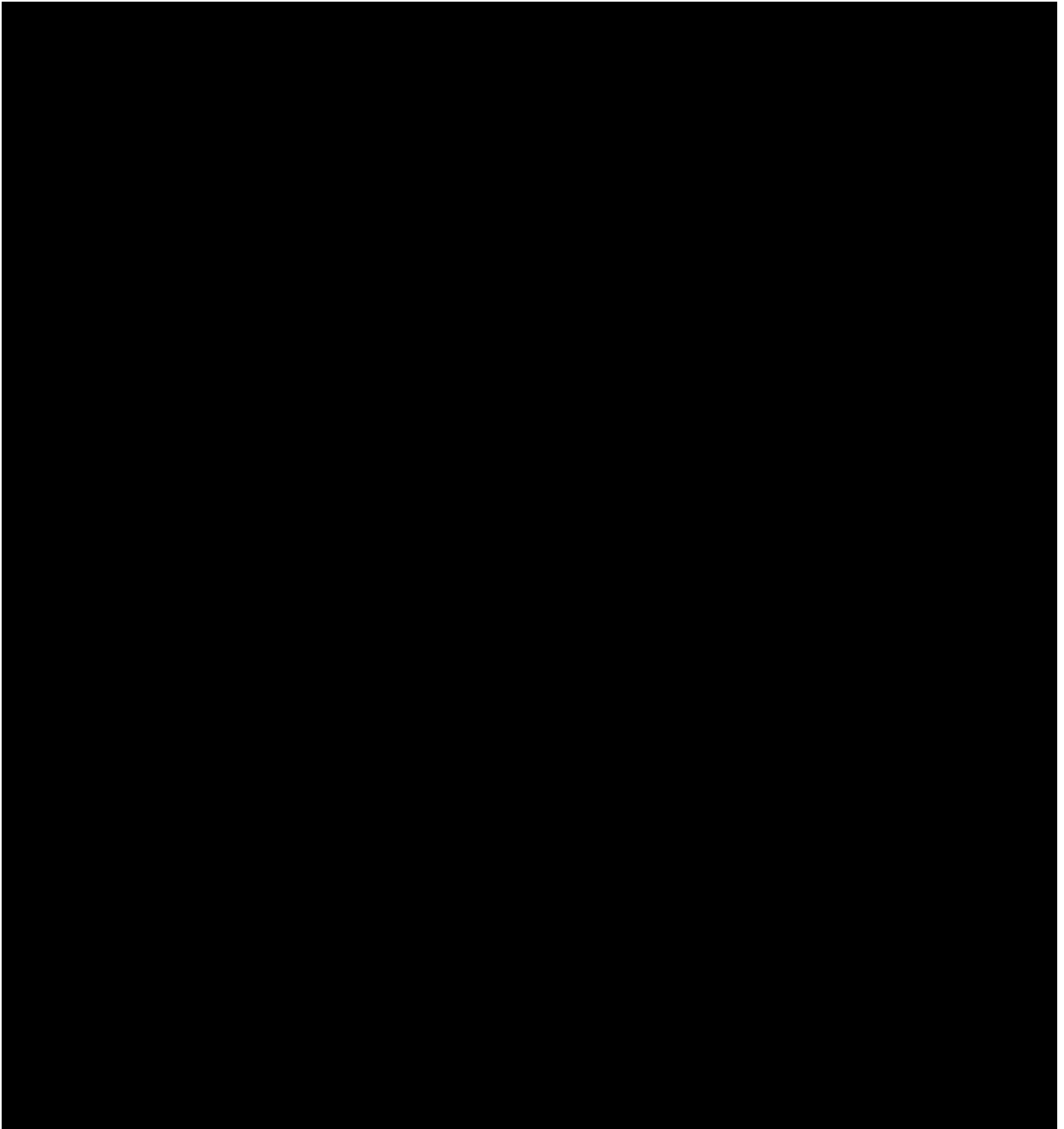
20 MR. GIMBEL: I'm going to join
21 in that objection.

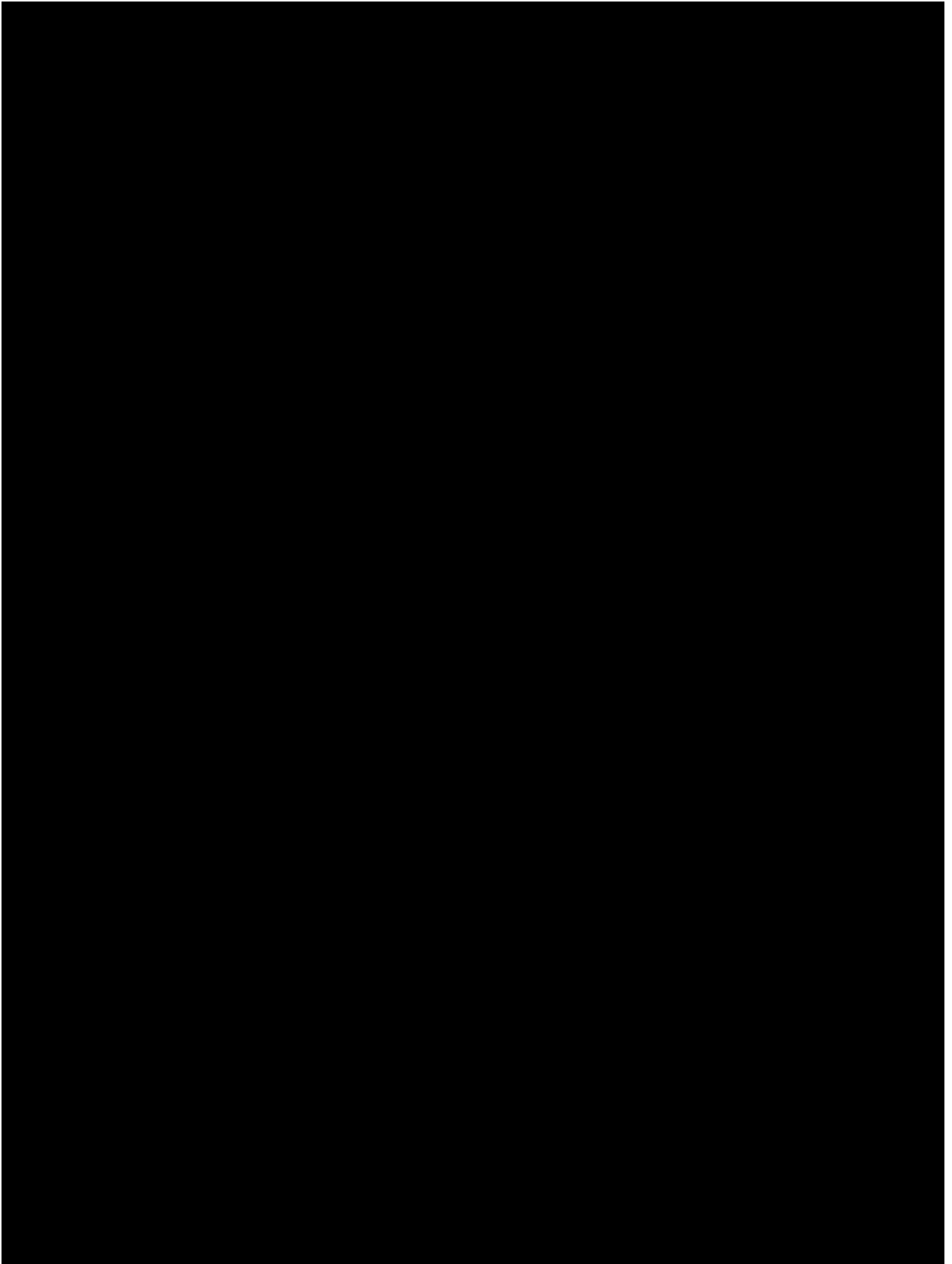
22 BY MR. WOLOSKY:

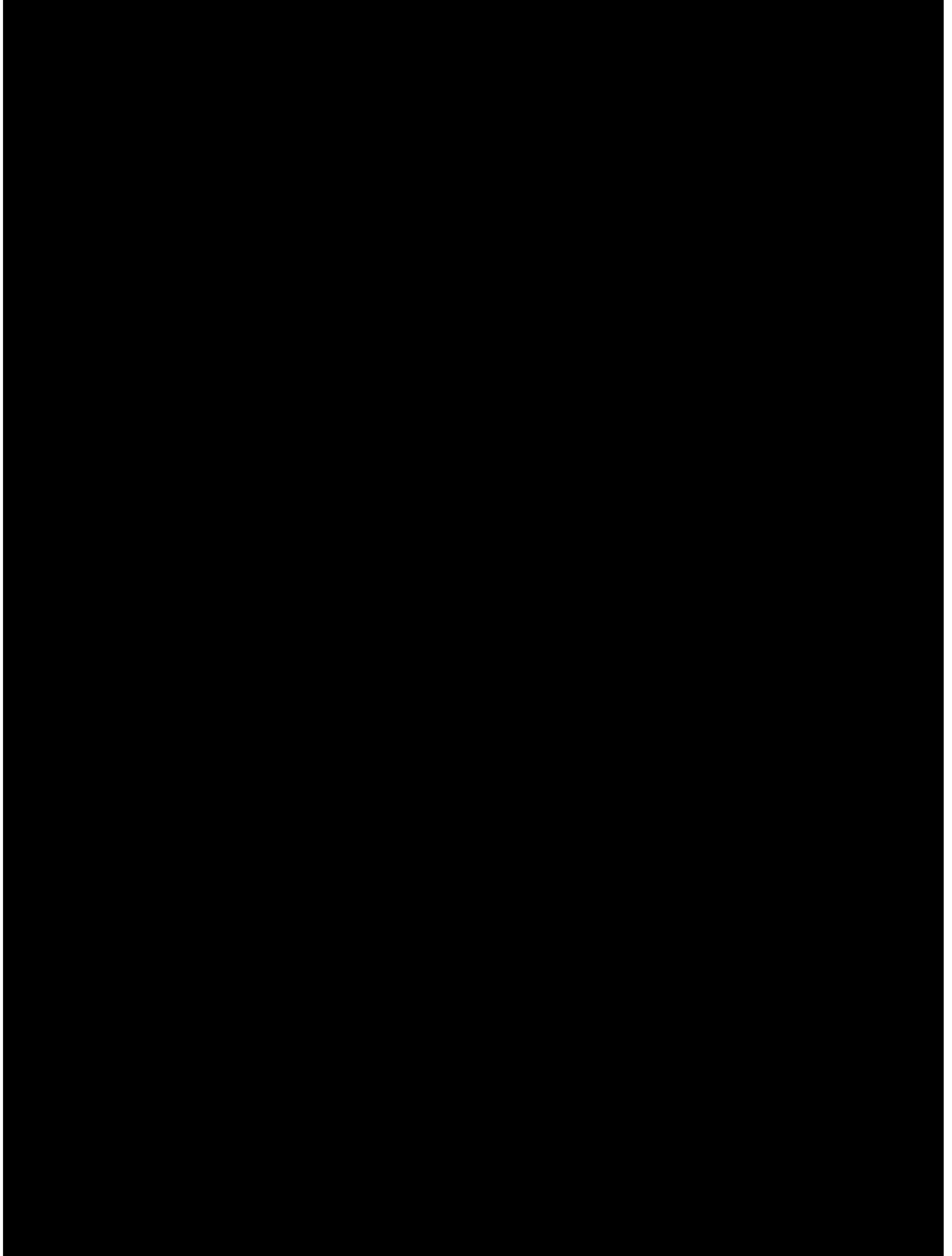
23 Q You can answer the question.

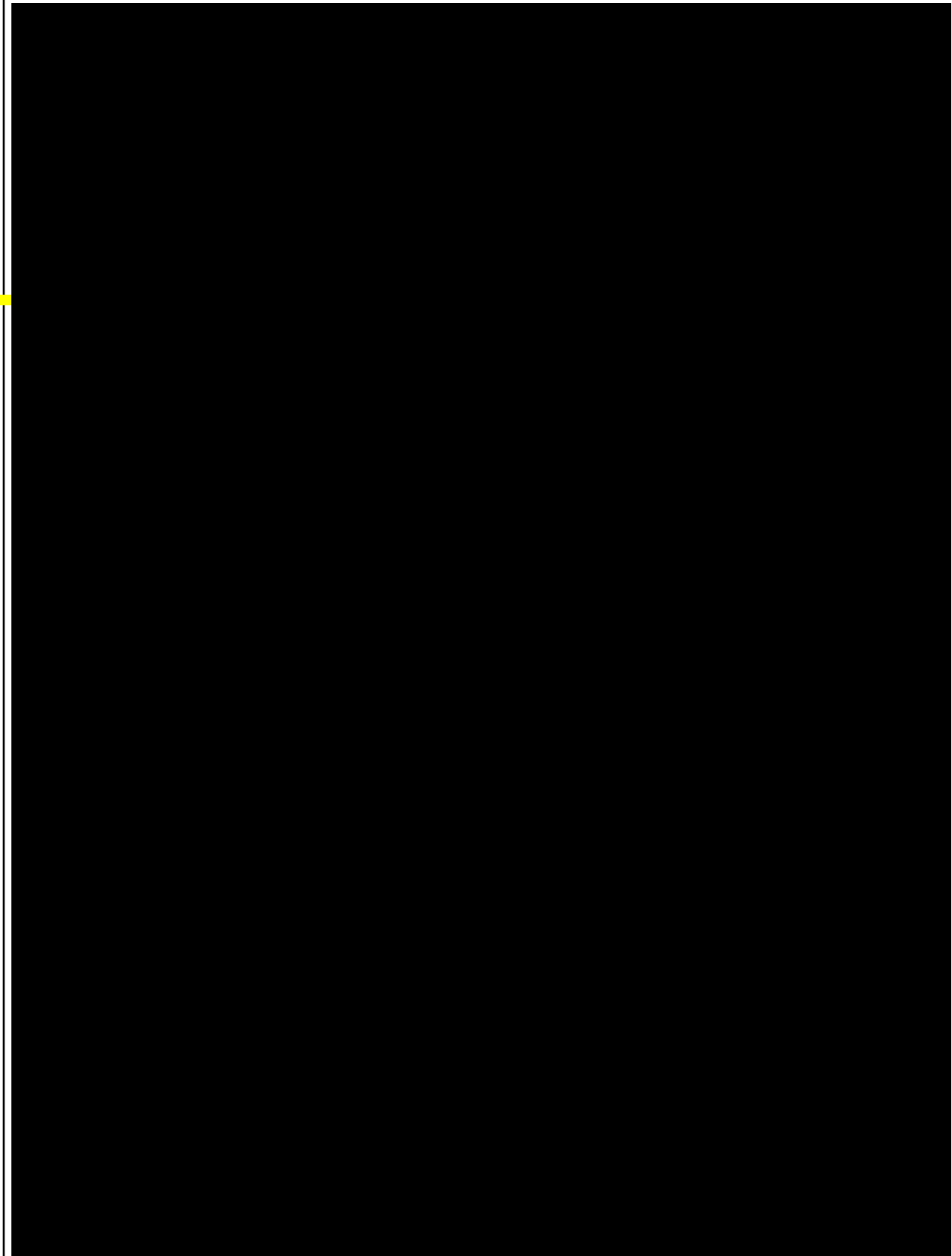
24 A I think my English is a little
25 bit -- I'm not so good in -- I was saying

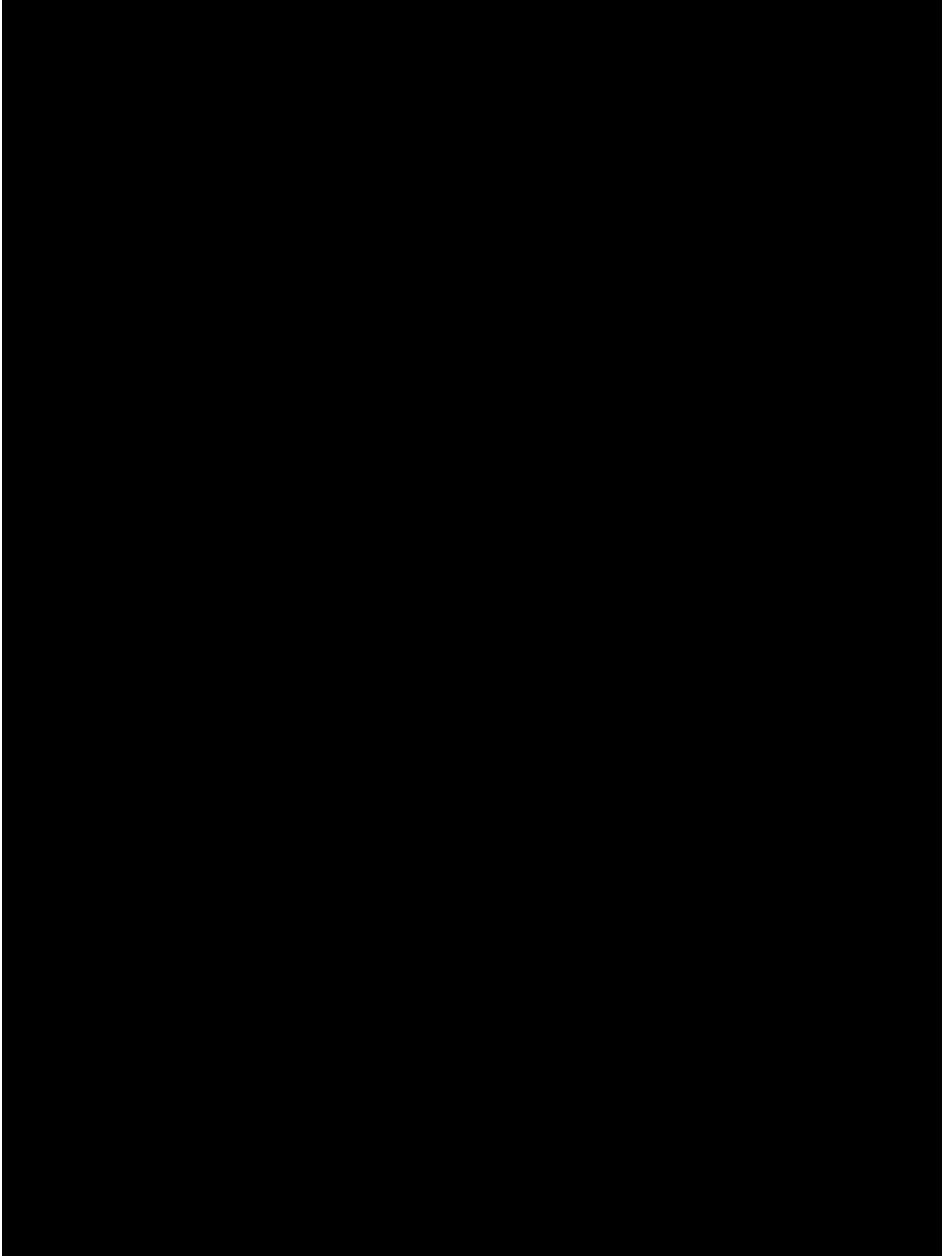
1 Allaham - ATTORNEYS' EYES ONLY
2 for me to use Ben Brafman against Jamal.
3 Meaning I need a lawyer to figure out our
4 dispute. So I was referring to myself to
5 use Ben Brafman.

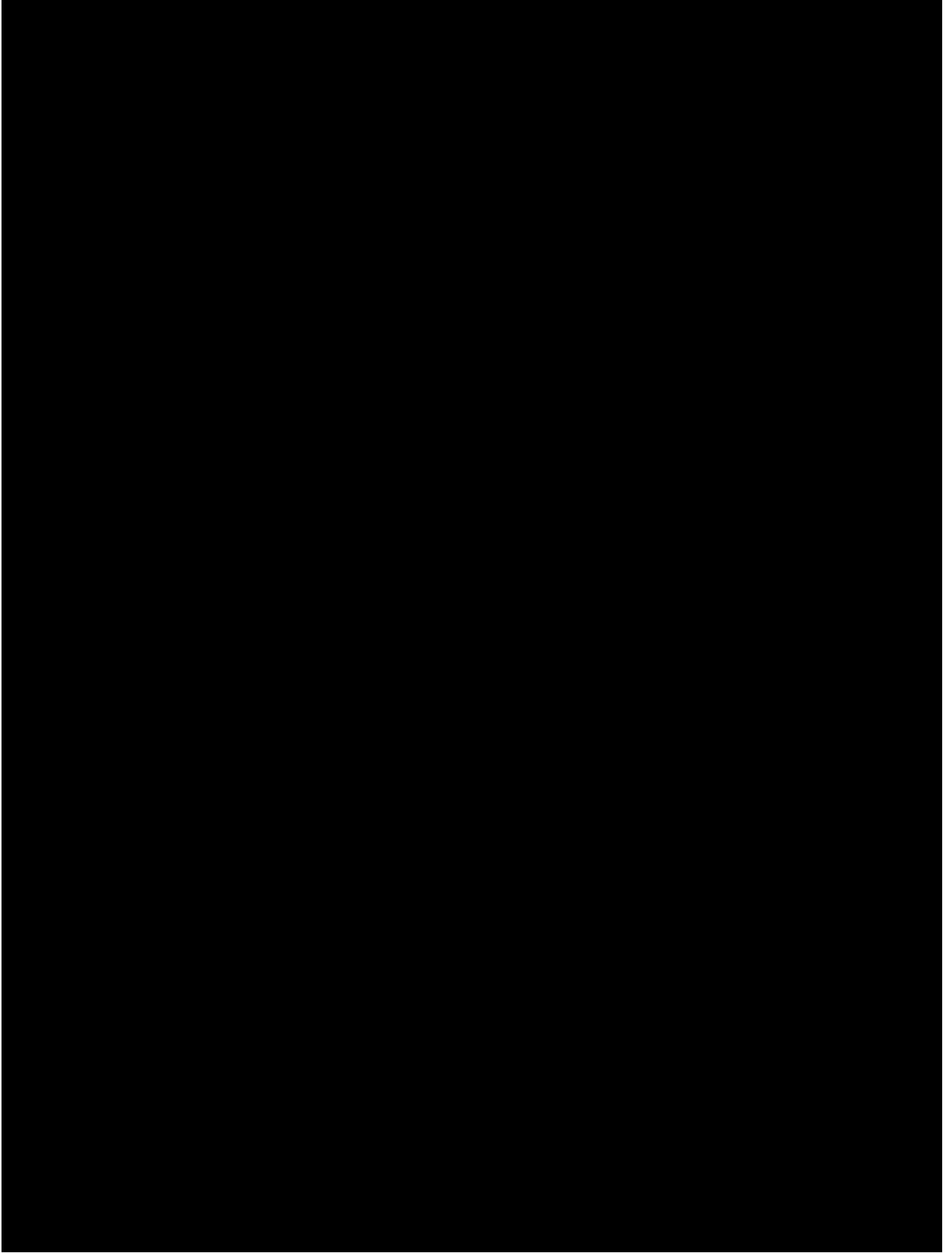


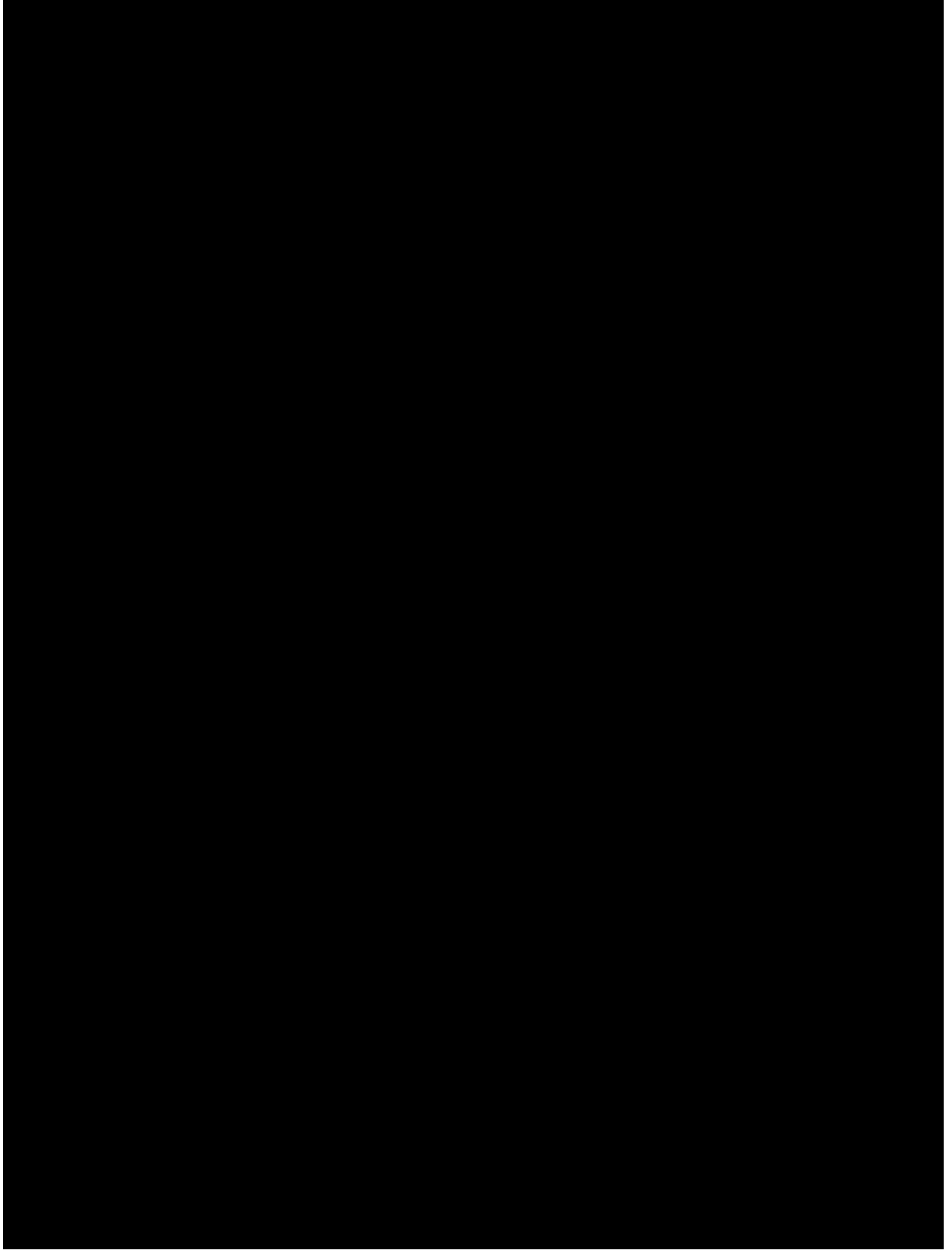


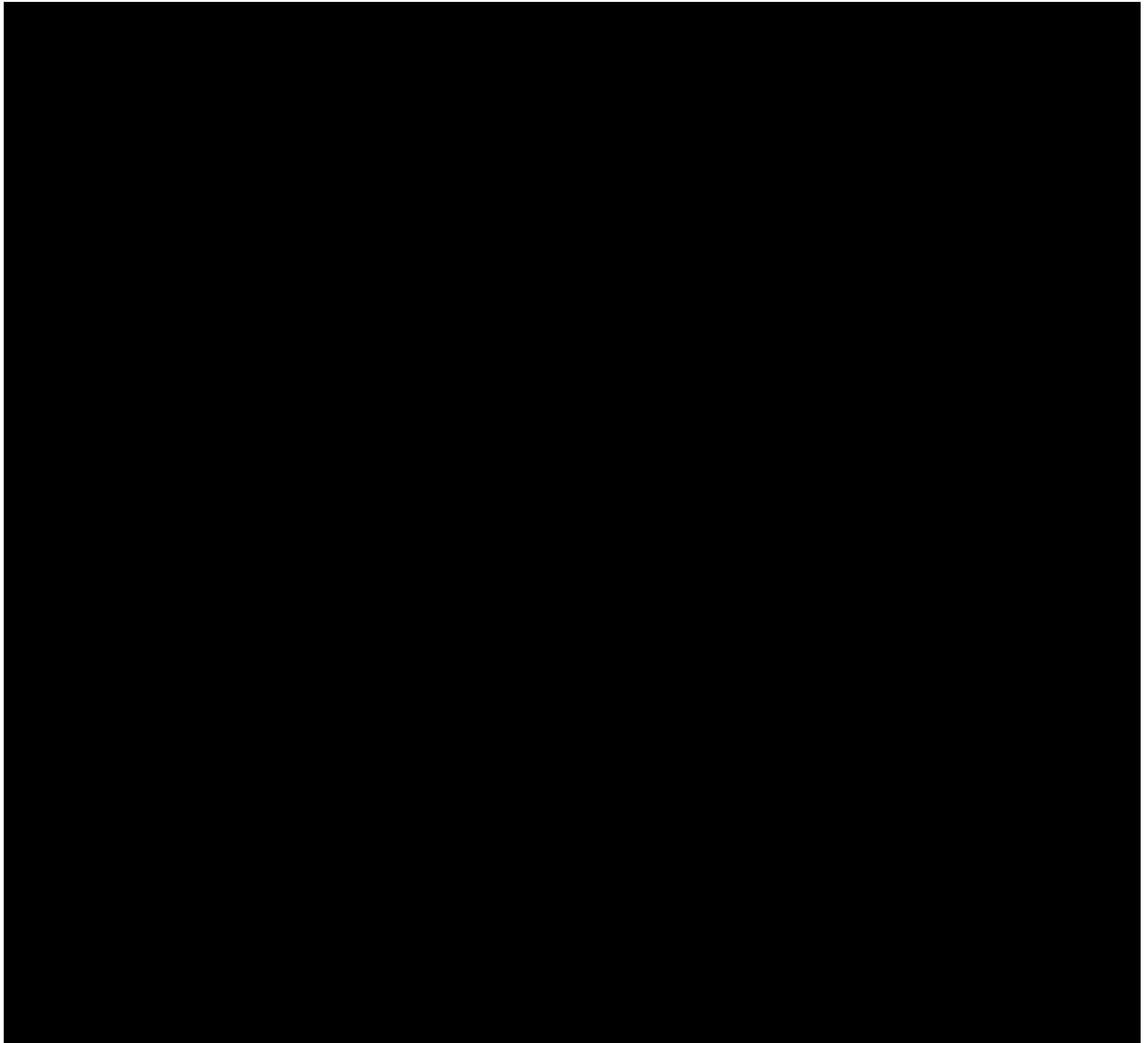












18 MS. YUSUF: Can I just take a
19 quick break?

20 MR. WOLOSKY: Sure.

21 THE VIDEOGRAPHER: The time is
22 10:03 a.m., and we're going off the
23 record.

24 (Thereupon, a recess was taken,
25 and then the proceedings continued as

1 Allaham - ATTORNEYS' EYES ONLY

2 follows:)

3 THE VIDEOGRAPHER: This is the
4 start of media labeled number 2. The
5 time now is 10:17 a.m., and we're back
6 on the record.

7 BY MR. WOLOSKY:

8 Q Mr. Allaham, have you ever been
9 associated with a business called the
10 Prime Hospitality Group?

11 A Yes.

12 Q What was the nature of that
13 business?

14 A Restaurant. Hospitality.

15 Q And Prime Hospitality Group
16 operated out of 550 Madison Avenue in New
17 York, otherwise known as the Sony
18 building, correct?

19 A Yes.

20 Q Did Prime Hospitality Group ever
21 perform work for the State of Qatar
22 directly or indirectly?

23 A No.

24 Q Does Prime Hospitality Group
25 still operate?

1 Allaham - ATTORNEYS' EYES ONLY

2 A No.

3 Q When did it close?

4 A Around the fall of 2017.

5 Q Have you ever been associated
6 with a business called AFH Associates,
7 LLC?

8 A Yes.

9 Q And what was the nature of that
10 business?

11 A It was a lease holder.

12 Q And what lease did it hold?

13 A At the Sony building.

14 Q Did it engage in any other
15 business?

16 A I mean, I was operating the
17 Prime Grill out of -- so that's --

18 Q Has AHF Associates ever
19 performed work for the State of Qatar
20 either directly or indirectly?

21 A No.

22 Q Is AFH still in operation?

23 A Rephrase that again, the
24 corporation?

25 Q Does it still conduct business?

1 Allaham - ATTORNEYS' EYES ONLY

2 A No.

3 Q Does it maintain any bank
4 accounts?

5 A No.

6 Q Did it at any time maintain bank
7 accounts?

8 A I believe so.

9 Q And do you recall at what banks
10 it maintained those accounts?

11 A I don't recall.

12 Q Did AFH have any offshore bank
13 accounts?

14 A No.

15 Q Did Prime Hospitality Group have
16 any offshore bank accounts?

17 A No.

18 Q Does Prime Hospitality Group
19 maintain any bank accounts that are still
20 open?

21 A No.

22 Q Have you been associated with a
23 business called Allaham Consultancy or
24 Allaham Consulting?

25 A Yes.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Do you have an ownership
3 interest in that business?

4 A Yes.

5 Q Do any other persons have an
6 ownership interest in that business?

7 A No.

8 Q What business does Allaham
9 Consultancy or Allaham Consulting conduct?

10 A Real estate consulting.

11 Q Has Allaham Consultancy or
12 Allaham Consulting ever performed work for
13 the State of Qatar either directly or
14 indirectly?

15 A Never.

16 Q Can you describe the manner in
17 which Allaham Consultancy provides real
18 estate consulting services?

19 A It's consulting services for
20 real estate.

21 Q And who does it provide those
22 services to?

23 A Whoever seeks to be a client.

24 Q And is that commercial real
25 estate or residential real estate?

1 Allaham - ATTORNEYS' EYES ONLY

2 A Both.

3 Q And is it -- what regions of the
4 country or world does Allaham Consultancy
5 provide real estate consulting services?

6 MS. YUSUF: Objection.

7 Are you referring to where it
8 operates or are you referring to where
9 the clients come from?

10 BY MR. WOLOSKY:

11 Q What are the geographic markets
12 that it provides consultancy services for?

13 A United States.

14 Q New York City?

15 A New York City.

16 Q Any places outside of New York
17 City?

18 A United States.

19 Q Is it a big company?

20 MS. YUSUF: Objection.

21 What do you mean by big?

22 BY MR. WOLOSKY:

23 Q What would you say the annual
24 revenues of Allaham Consultancy or Allaham
25 Consulting are?

1 Allaham - ATTORNEYS' EYES ONLY

2 A It just started not long ago.

3 Q When did it start?

4 A I'm not sure, but not long.

5 Less than a year.

6 Q How many clients does it have?

7 A Whoever comes. I mean, it is

8 not --

9 Q Does it have any clients?

10 A At this time, no.

11 Q Does Allaham Consultancy

12 maintain bank accounts?

13 A No.

14 Q How does Allaham Consultancy get

15 paid by its clients?

16 A If there is a client, usually

17 depends how the deal is structured. I

18 mean --

19 Q I'm sorry. I'm having a hard

20 time understanding.

21 If it doesn't have bank

22 accounts, how does it get paid?

23 A I mean, when the deal -- when

24 there is a deal, I don't have to get paid.

25 Q Participation in a deal, is that

1 Allaham - ATTORNEYS' EYES ONLY
2 how Allaham Consultancy receives
3 compensation for its work?

4 A That is my aim to be.

5 Q But it is fair to say that
6 Allaham Consultancy has not conducted any
7 deals at this point for which it would
8 receive compensation?

9 MS. YUSUF: Objection. Assumes
10 facts not in evidence.

11 BY MR. WOLOSKY:

12 Q Has Allaham Consultancy
13 participated in any real estate
14 transactions for which it has or will
15 receive compensation?

16 A Not yet.

17 Q Does Allaham Consultancy have
18 any offshore bank accounts?

19 A No.

20 Q Are there any other real estate
21 consultancy firms that you have been
22 associated with other than Allaham
23 Consultancy?

24 MS. YUSUF: Objection.

25 Is there a time period here or

1 Allaham - ATTORNEYS' EYES ONLY

2 do you mean in life?

3 MR. WOLOSKY: In life.

4 A Yes.

5 Q What are the other firms with
6 which you have been associated that have
7 conducted real estate consultancy work?

8 A I don't recall the name. It was
9 around 2010 or '11 we had a small company.

10 Q And did you do any real estate
11 deals when you had that small company?

12 A It was more. Definitely we did
13 a few deals, but, again, the real estate
14 is vague about -- could be raising money
15 for a deal or could be -- yes, the answer
16 is yes.

17 Q How many deals would you say you
18 have done in real estate?

19 A When I had the company, you
20 mean?

21 Q Yes. And throughout your life.

22 A I would say we did a few deals.

23 Q So less than five, would you
24 say?

25 A I don't remember. It was years

1 Allaham - ATTORNEYS' EYES ONLY
2 ago.

3 Q Was it more than 100?

4 A No.

5 Q So it is somewhere between --

6 MR. WOLOSKY: Sorry. Strike
7 that.

8 Q Can you name any deals that you
9 did in real estate during that period of
10 time?

11 A I mean, I helped sell something
12 in downtown Miami.

13 Q Was that a commercial project or
14 residential project?

15 A Commercial. I'm not sure
16 actually. Could be both.


17 Q Other than the Miami deal, are
18 there any other real estate deals that you
19 can name that you did?

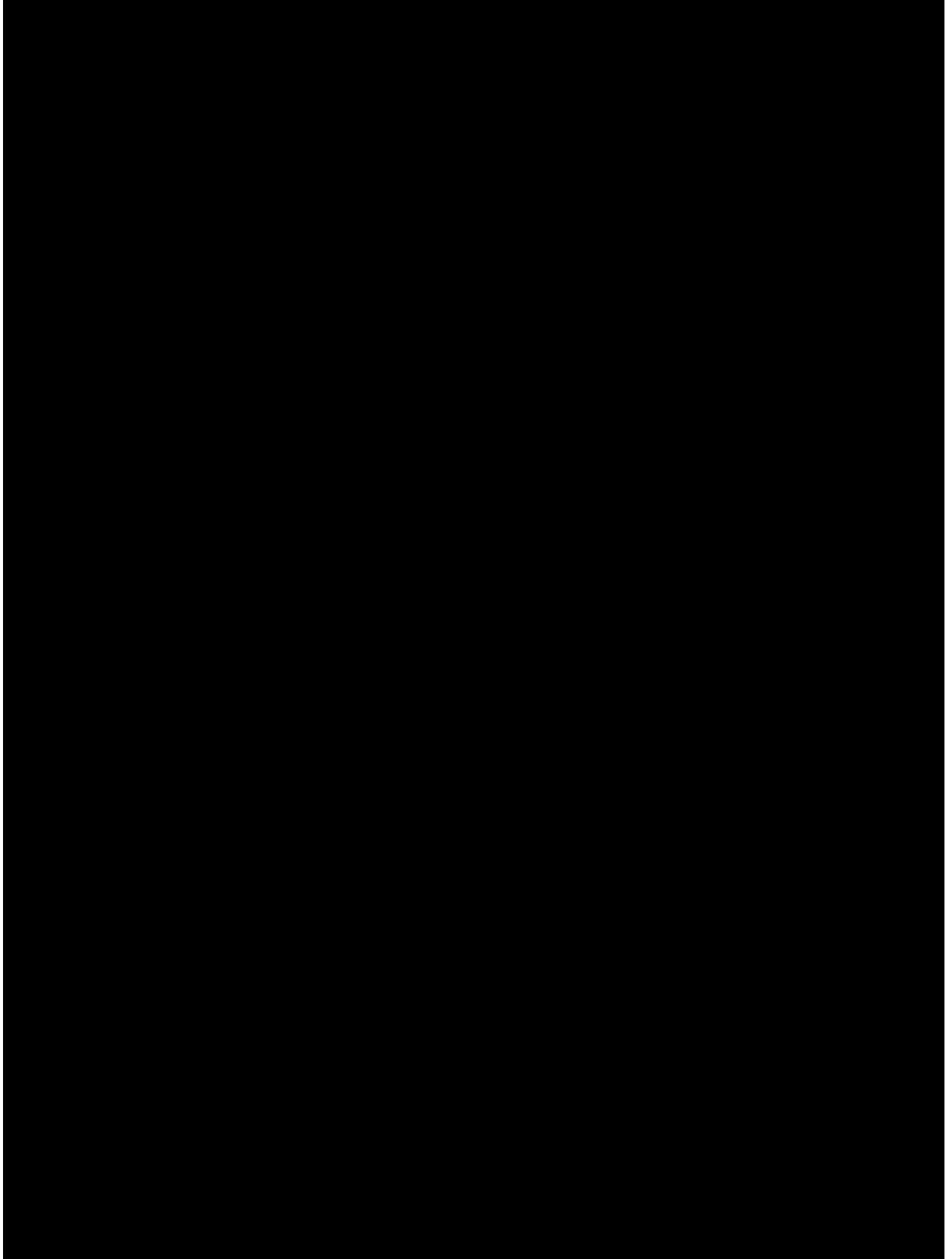
20 A Again, I don't recall but there
21 were a few. I don't recall.

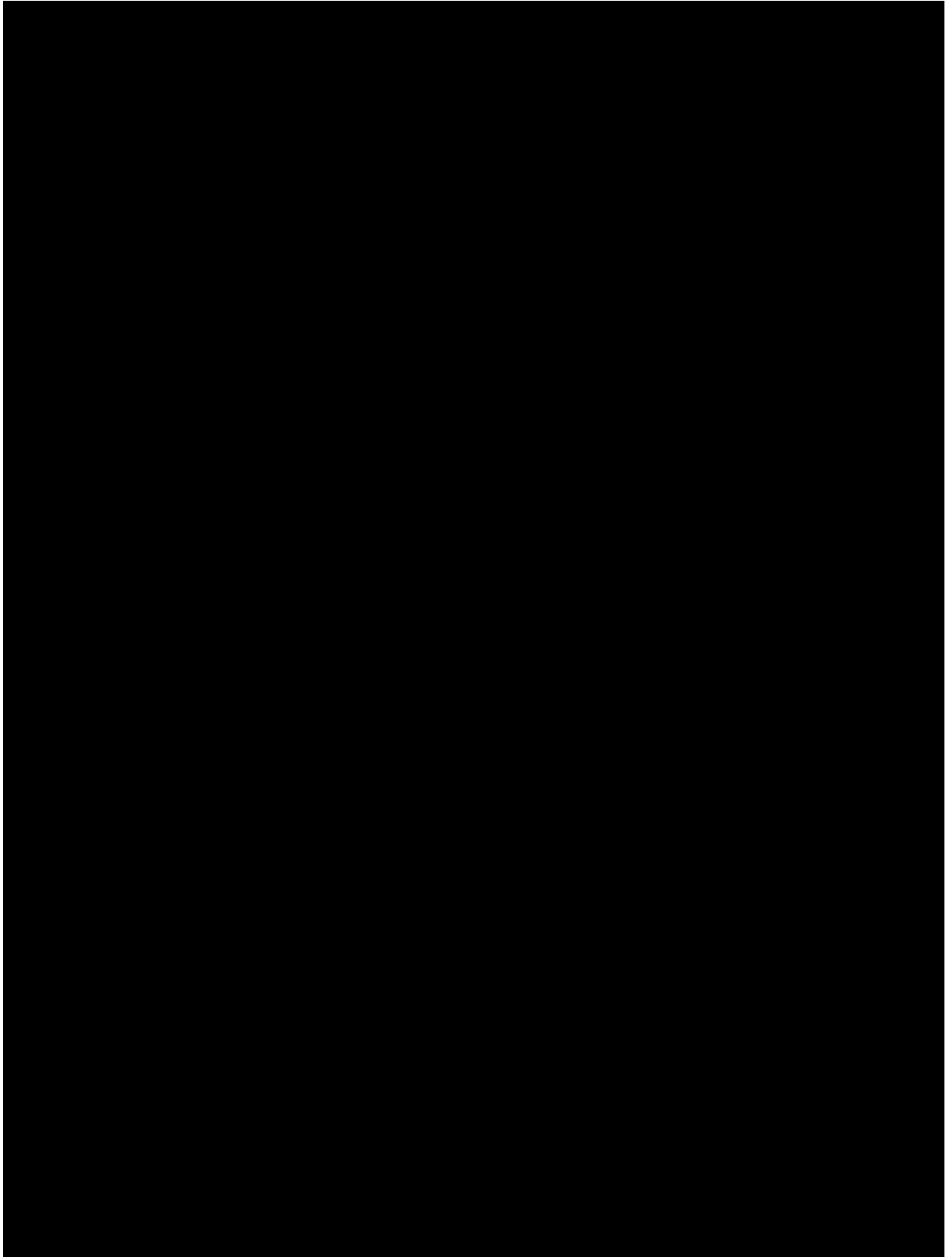
22 Q There were a few.

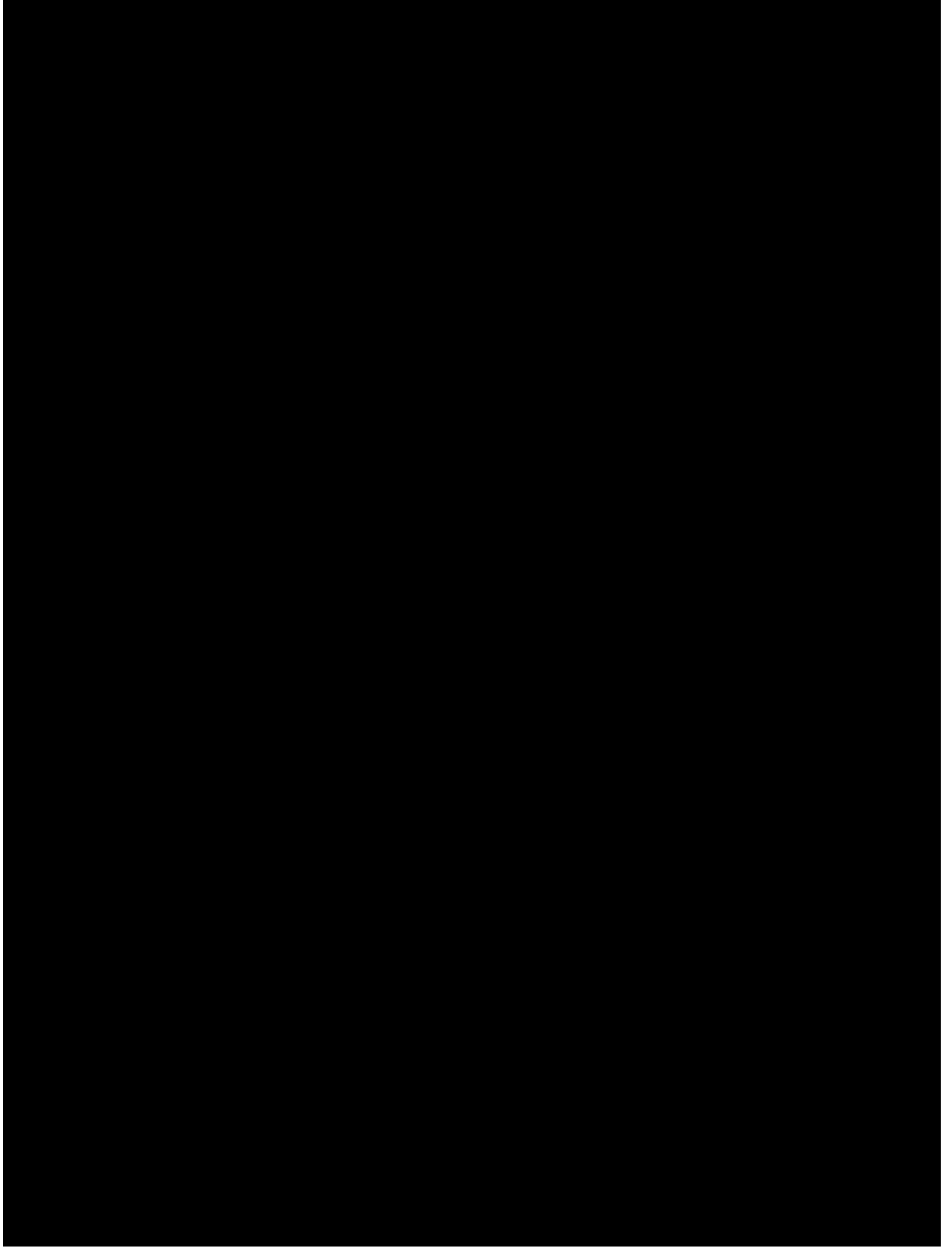
23 Less than ten, would you say?

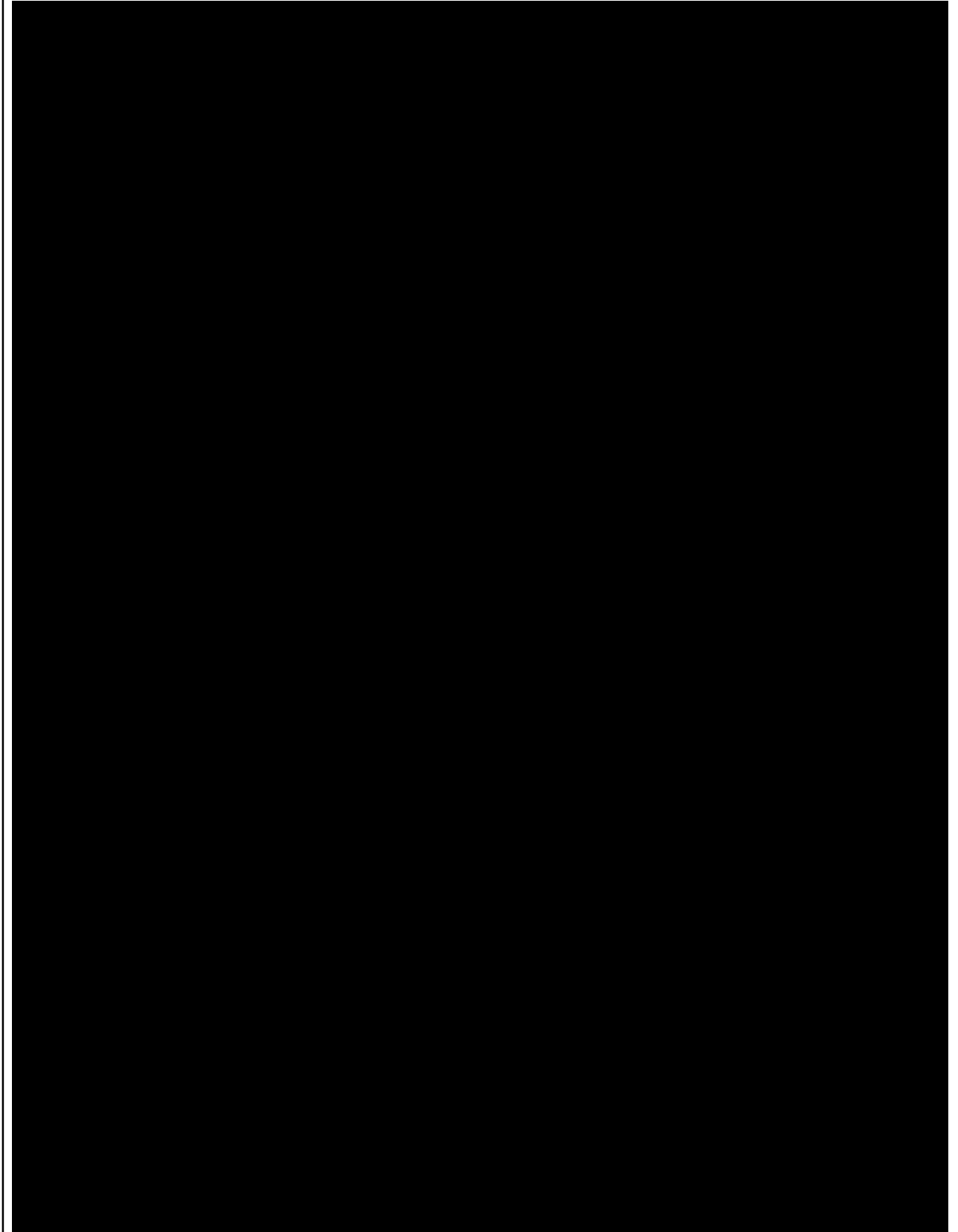
24 A I don't recall.

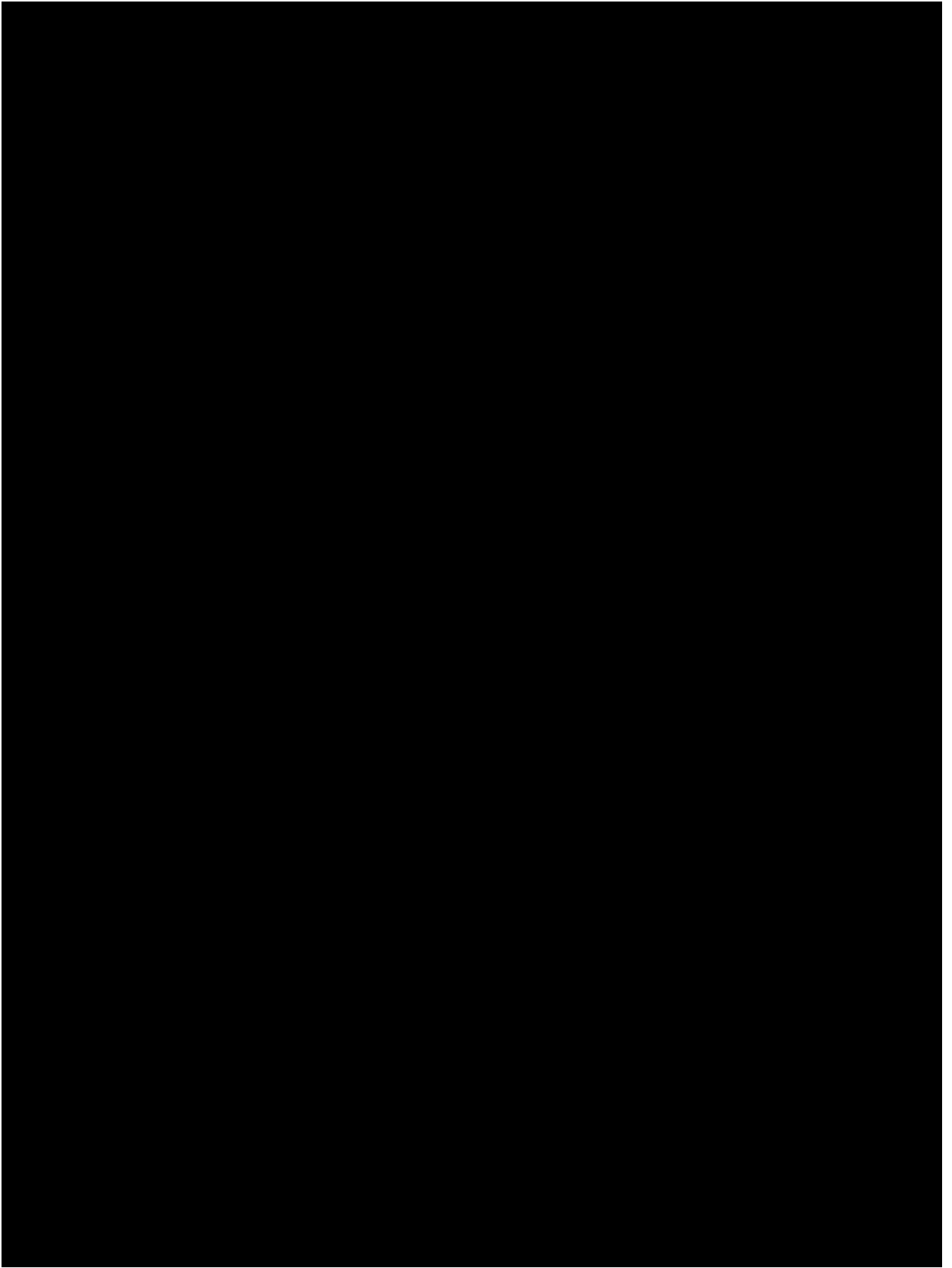


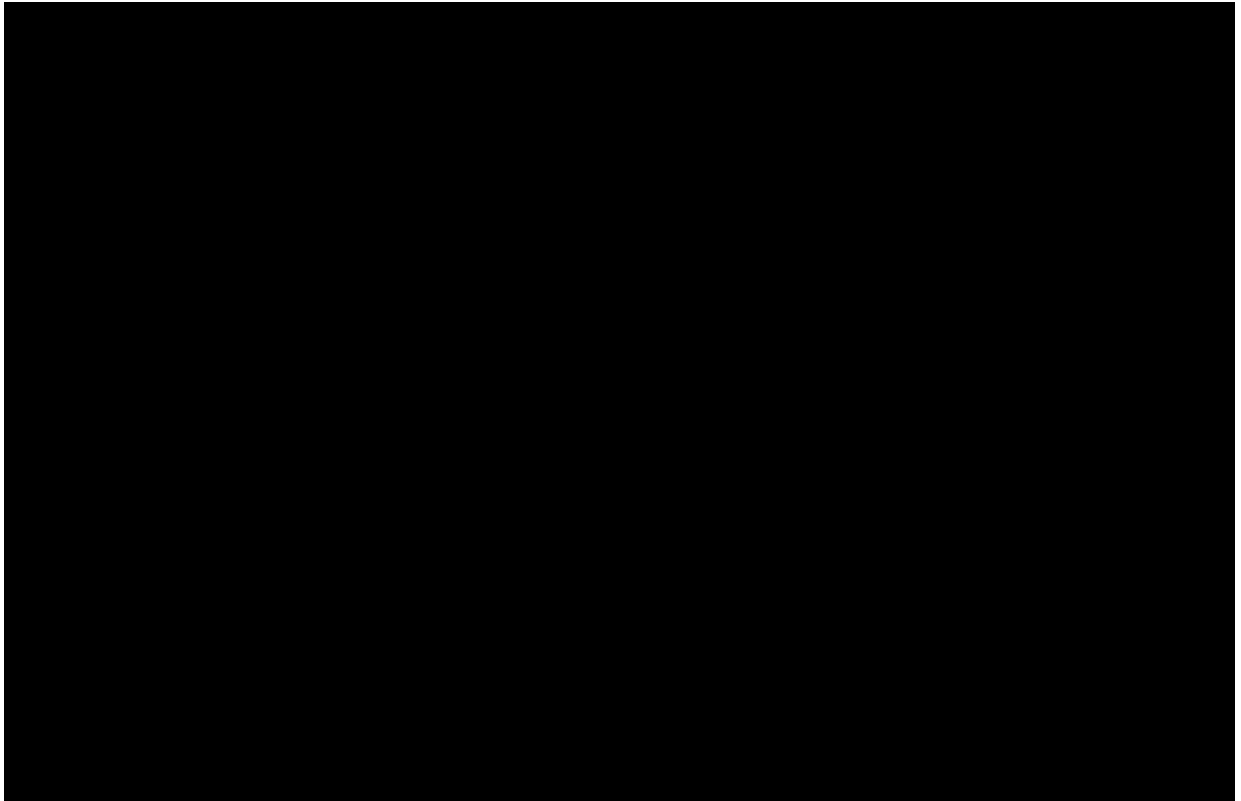












13 Q Have you ever been associated
14 with the business called Coin Funding,
15 LLC?

16 A Coin Funding?

17 Q Coin Funding, LLC.

18 A Is that Rodman's, Dennis
19 Rodman's --

20 Q You've not heard of this
21 company?

22 A No.

23 Q I'd like to show you an exhibit
24 that has been marked for identification as
25 Allaham 30.

1 Allaham - ATTORNEYS' EYES ONLY
2 (Whereupon, Printout of Terms
3 and Conditions of Allaham Consulting
4 website, was marked as Allaham Exhibit
5 30 for identification, as of this
6 date.)

7 BY MR. WOLOSKY:

8 Q This is a printout of the
9 Allaham Consulting website.

10 I'd like to direct your
11 attention to the first page where it says
12 under terms and conditions, "Information
13 about us". It says,
14 "www.AllahamConsulting.com is owned and
15 operated by Coin Funding, LLC".

16 Do you see that?

17 A Yes.

18 Q Can you explain what Coin
19 Funding, LLC is?

20 A I have no idea. Probably the
21 website guy. I have no clue.

22 Q Have you ever seen this document
23 before?

24 A I have to admit, I never in my
25 life read the terms and conditions on

1 Allaham - ATTORNEYS' EYES ONLY

2 anything, so no. I have seen it but I
3 have never read it.

4 Q Who was involved in setting up
5 the www.AllahamConsulting.com web page?

6 A A web master person.

7 Q I'm sorry?

8 A A website person.

9 Q Do you know the name of that
10 person?

11 A Baskhar.

12 Q Were there any other employees
13 or owners of Allaham Consulting involved
14 in setting up the web page?

15 A No.

16 Q Other than Lexington and Allaham
17 Consultancy, are you presently associated
18 with any other business entities?

19 A No.

20 Q Other than Lexington and Allaham
21 Consultancy, were you involved or
22 associated with any other business
23 entities in 2017?

24 A No.

25 Can I add something to that?

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Please.

3 A There is no offshore account
4 that I'm affiliated with in any company or
5 personally.

6 Q Okay.

7 A Okay? For the record.

8 Q Why were you looking into
9 establishing an offshore account in 2017?

10 MS. YUSUF: Objection. The
11 question is about offshore accounts,
12 and I believe you're referring to the
13 WhatsApp message that was asked and
14 answered.

15 MR. GIMBEL: I think it also
16 mischaracterizes the record.

17 BY MR. WOLOSKY:

18 Q I'd like to show you an exhibit
19 that's been marked for identification as
20 Exhibit Allaham Exhibit 7.

21 (Whereupon, Two Binders
22 containing phone records, were marked
23 as Allaham Exhibit 7 for
24 identification, as of this date.)

25 BY MR. WOLOSKY:

1 Allaham - ATTORNEYS' EYES ONLY

2 Q These are phone records from
3 Sprint that plaintiff received on May 18th
4 in response to a subpoena plaintiff served
5 on Sprint on May 1st.

6 These materials were produced to
7 us in an Excel spreadsheet, which was
8 printed to create this exhibit.

9 I represent that this exhibit is
10 unchanged from the Excel spreadsheet
11 except for the header containing page
12 numbers and the date of printing, along
13 with some handwritten notations that
14 indicate the identity of the person who
15 was called or who you called.

16 And this document reflects that
17 it is a record of calls placed to or from
18 the phone number 917-570-6132, beginning
19 May 1, 2017 and ending May 1, 2018.

20 Now --

21 MR. GIMBEL: Can I just ask for
22 the record, you have said that there
23 are handwritten notations here. Are
24 those handwritten notations supplied
25 by the business record holder, Sprint,

1 Allaham - ATTORNEYS' EYES ONLY
2 or have they been added by somebody on
3 your team?

4 MR. WOLOSKY: They have been
5 added by our team.

6 MR. GIMBEL: We object to the
7 notations on the ground that they are
8 not a business record.

9 MS. YUSUF: And I similarly want
10 to state for the record that this is
11 the first time that counsel for
12 Mr. Allaham is seeing what looks like
13 almost a thousand pages of paper.

14 Certainly I expect that we will
15 be directed to specific pages, but I
16 just want to be clear that this is not
17 a document that we have reviewed or
18 received previously.

19 BY MR. WOLOSKY:

20 Q Now, is it correct that
21 917-570-6132 is your -- the phone number
22 that you use?

23 MS. YUSUF: Objection. Asked
24 and answered.

25 A Yes.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q And is it correct that you use
3 Sprint as your mobile service provider for
4 that phone number?

5 A Yes.

6 Q Now, I will represent to you,
7 and I'm happy to flag them for you on the
8 pages in this document, they appear on
9 pages 851, 855, 859, 860, 862, 863, 864,
10 866, 867, 873, 874, 878, 839, 880, 883,
11 884, 887, 890, 908, 909, 919, 921 and --
12 that's it.

13 There are 42 phone calls placed
14 to or from the phone number 869-469-0080,
15 which is the phone number for Bank of
16 Nevis International in the Caribbean.

17 Did you make those calls,
18 Mr. Allaham?

19 MS. YUSUF: Objection.

20 I believe counsel just said some
21 were received and some were sent. So
22 which calls are you referring to?

23 BY MR. WOLOSKY:

24 Q Did you participate in those
25 phone calls with Bank of Nevis

1 Allaham - ATTORNEYS' EYES ONLY

2 International?

3 MR. GIMBEL: I want to state an
4 objection to the form of the question
5 because I think counsel is testifying.

6 A Yes.

7 Q What was the subject matter of
8 those calls?

9 MS. YUSUF: Which calls
10 specifically? You just said there are
11 44 different ones, and Mr. Allaham
12 doesn't know which page you're
13 referring to. So how can he answer
14 questions about calls?

15 MR. DWYER: Are you testifying?
16 Objections are as to form. You're
17 really trying to coach the witness.

18 MS. YUSUF: That's a lot coming
19 from you, Bob, but okay.

20 BY MR. WOLOSKY:

21 Q Sir, it is a simple question.

22 Do you deny making or receiving
23 42 phone calls from Bank of Nevis
24 International?

25 A No.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q So what was the subject of those
3 42 phone calls?

4 A I was trying to open an account
5 in Nevis.

6 Q Isn't it true that you have an
7 account at Bank of Nevis International?

8 A No, it is not true, and I do not
9 have an account at Nevis or any offshore
10 period.

11 Q And isn't it true that you were
12 calling on those dates or receiving phone
13 calls on those dates concerning deposits
14 to your account?

15 A I do not have an account.

16 Q And your testimony is that you
17 were trying to open phone calls -- excuse
18 me.

19 You were trying to open a bank
20 account and you needed to call 42 times?

21 A We -- I was trying to open an
22 account and it is the research, more or
23 less, paperwork, and then I decided no
24 need to open the account.

25 Q And have you traveled to Nevis?

1 Allaham - ATTORNEYS' EYES ONLY

2 A Never.

3 Q And why is it that you selected
4 Bank of Nevis as a location to pursue
5 opening up a bank account?

6 A Because that's what my
7 accountant suggested to me, that that is
8 the place to do it.

9 Q Who is your accountant?

10 A Allen Dorkin.

11 Q Did you retain an accountant in
12 Nevis concerning this bank account?

13 MS. YUSUF: Objection.

14 Which bank account are you
15 referring to?

16 BY MR. WOLOSKY:

17 Q Did you retain an accountant or
18 any professional service providers in
19 Nevis concerning your interest in opening
20 up a bank account at Bank of Nevis?

21 A No, I did not.

22 Q Do you know someone named Midge
23 Morton?

24 A I think the name is familiar.

25 That's why I said earlier, I have to look

1 Allaham - ATTORNEYS' EYES ONLY
2 it up.

3 Q Okay.

4 Well, I will represent to you
5 that there are multiple phone calls to or
6 from Midge Morton on the Island of Nevis
7 during the same time period as your phone
8 calls to or from Bank of Nevis.

9 I'll further represent that
10 those phone calls appear on pages 851,
11 852, 853, 855, 858 and 860 at the same
12 time, roughly, as the phone calls to or
13 from Bank of Nevis.

14 Is it your testimony that you
15 have no recollection of 11 phone calls
16 with Midge Morton during February of this
17 year?


18 MS. YUSUF: Objection
19 mischaracterizes the testimony.

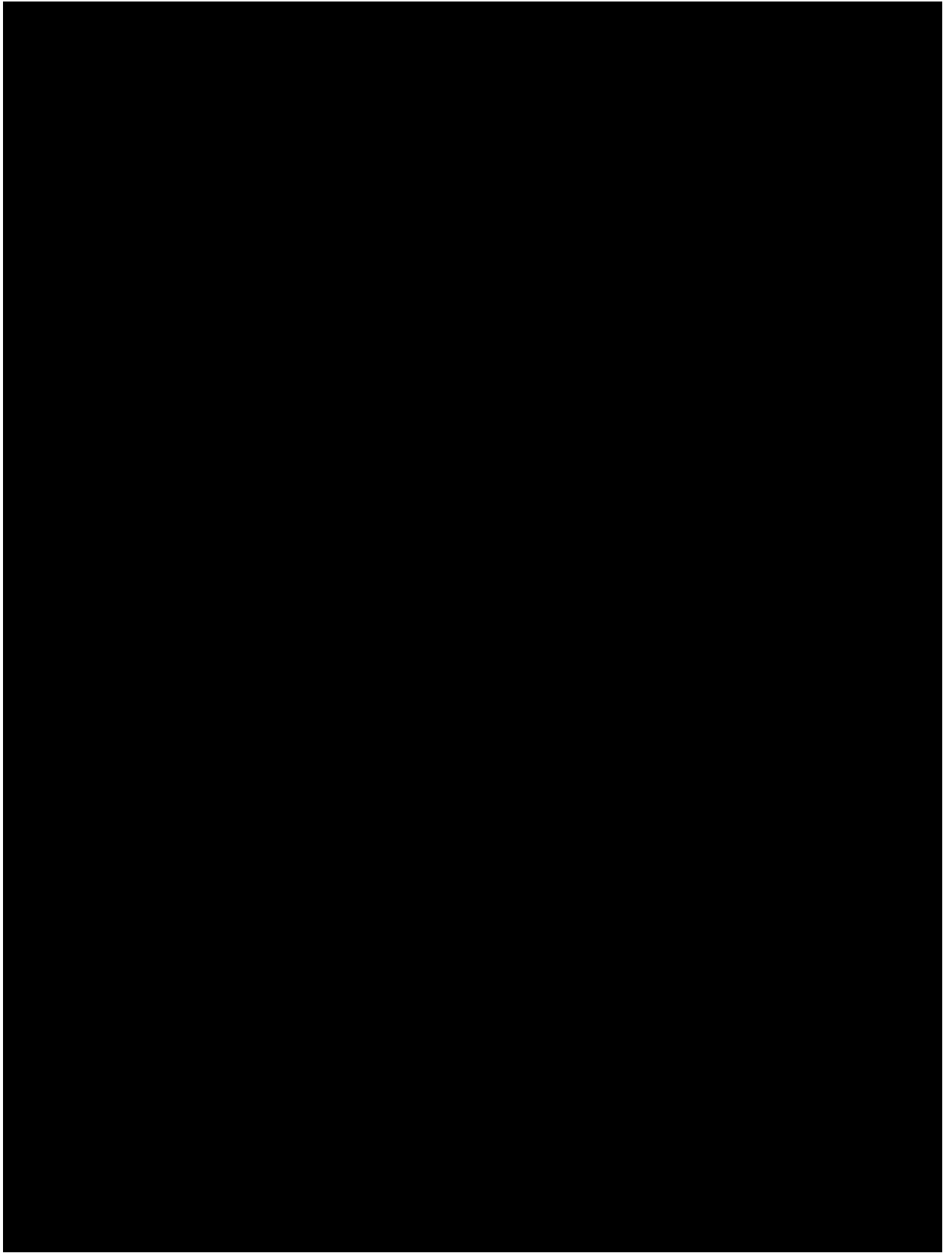
20 MR. GIMBEL: Objection. Form.

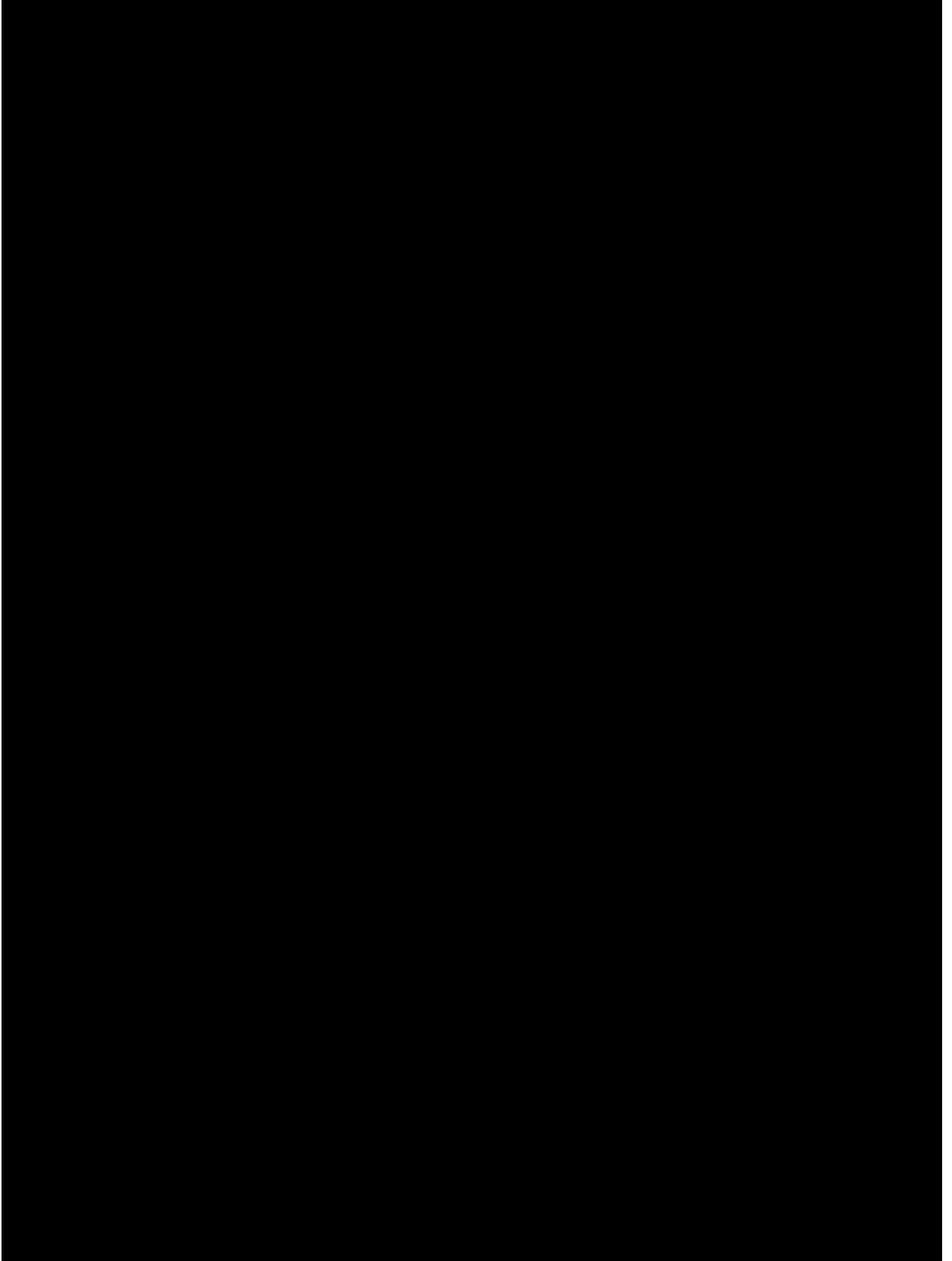
21 A As I stated, I was trying to
22 open an account through my accountants and
23 then we decided it is a hassle, and if the
24 Qataris want to pay me, they should pay me
25 in the United States.

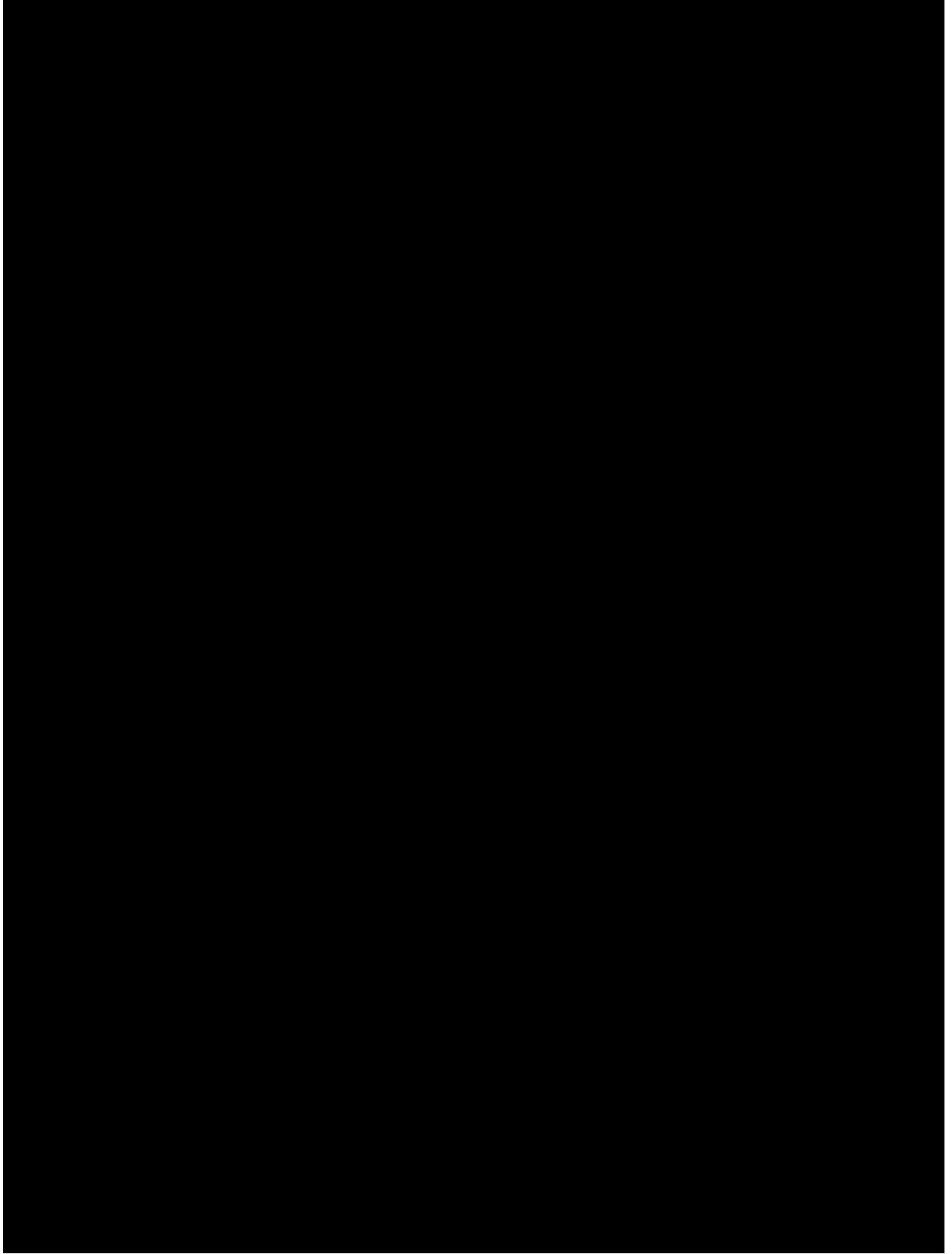
1 Allaham - ATTORNEYS' EYES ONLY

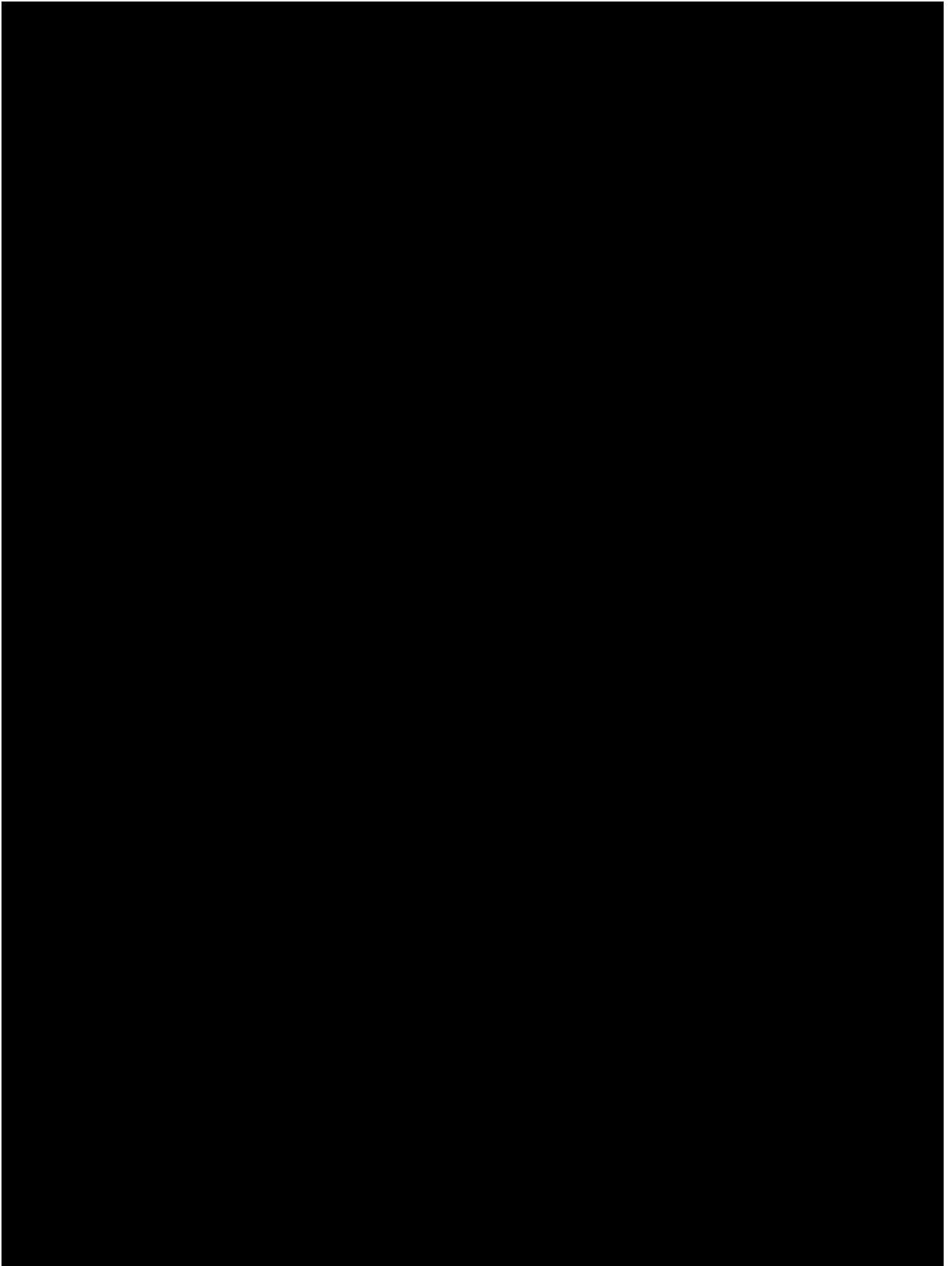
2 The account was never opened and
3 never went through, and there was nothing
4 there. The phone calls were just research
5 for what paperwork is needed. It was too
6 complicated, above my pay rate to open it.
7 I'm not that sophisticated, so it was
8 never opened.

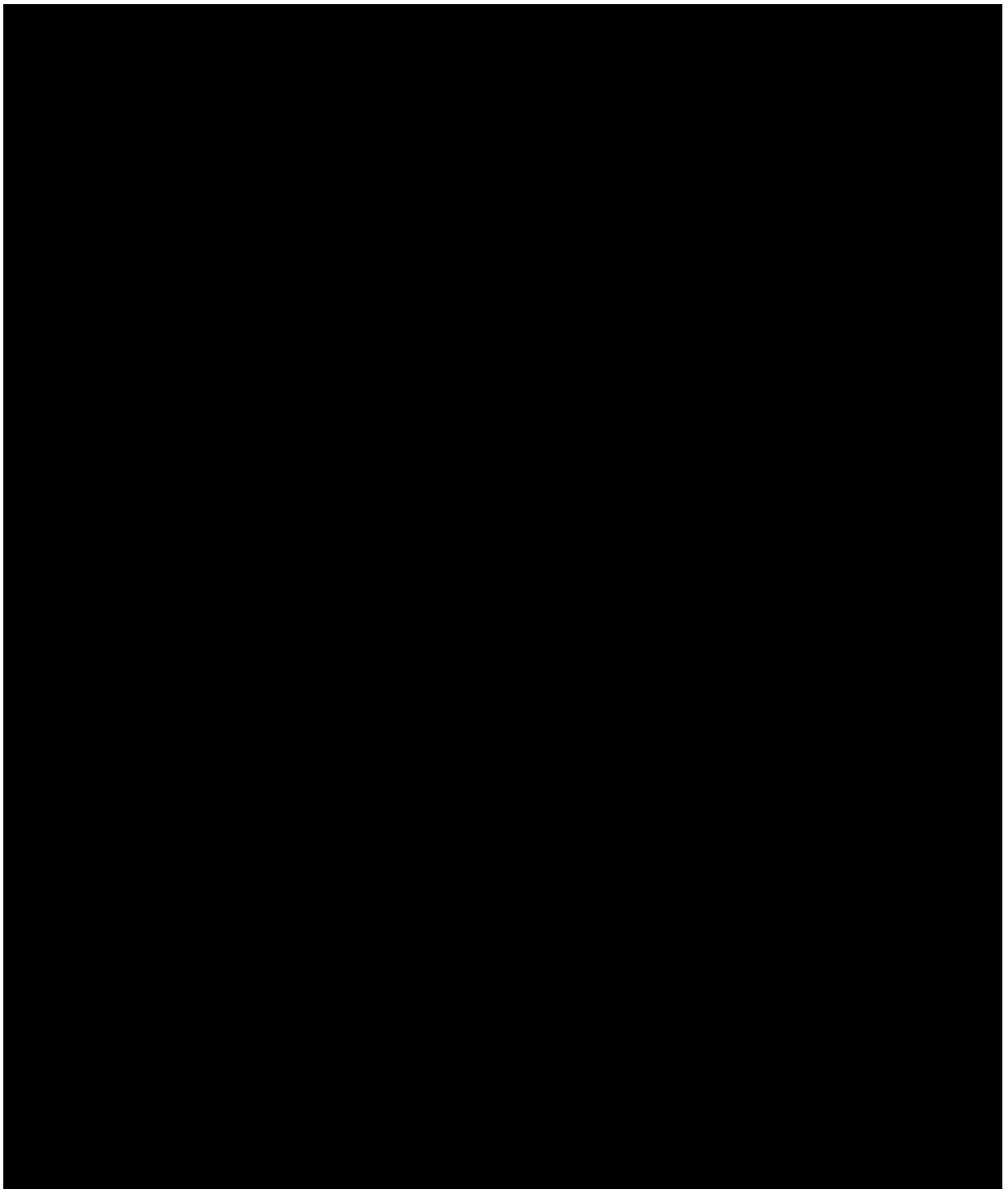












23 Q Well, then, why don't we have
24 you review the document that we have
25 marked for identification as Exhibit

1 Allaham - ATTORNEYS' EYES ONLY

2 number 1.

3 (Whereupon, Short Form
4 Registration Statement Pursuant to the
5 Foreign Agents Registration Act of
6 1938, was marked as Allaham Exhibit 1
7 for identification, as of this date.)

8 A I'm sorry --

9 MS. YUSUF: There is no
10 question.

11 A There is something I just
12 remembered, and I would like to put it
13 back on the record, which is important.

14 I got paid for a real estate
15 deal that I had done years ago at the end
16 of 2017. I was owed the money and the
17 person paid me the money.

18 Q Who was the person?

19 A It is a New York company
20 unrelated to Qatar or any -- it is a --
21 just to show you that I was involved in
22 the real estate business.

23 Q Sure.

24 A Not related at all. It goes
25 back to a 2007 or 2008 deal that I had

1 Allaham - ATTORNEYS' EYES ONLY

2 done.

3 Q Okay.

4 Let's start with this document,
5 which is your short form registration
6 statement, pursuant to the Foreign Agents
7 Registration Act of 1938 as amended.

8 It was filed with the National
9 Security Division of the Department of
10 Justice on June 15, 2018.

11 Do you see that?

12 A Yes.

13 Q Okay.

14 Did you review this document
15 before it was filed?

16 A Yes.

17 Q And are you aware that you
18 signed it under penalty of perjury?

19 A What does that mean?

20 Q I mean, if you look at page 2,
21 two thirds of the way down, the page right
22 above your signature it says, "The
23 undersigned swears or affirms that under
24 penalty of perjury, that he or she has
25 read the information set forth in this

1 Allaham - ATTORNEYS' EYES ONLY
2 registration statement, and that he/she is
3 familiar with the contents thereof, and
4 that such contents are in their entirety
5 true and accurate to the best of his or
6 her knowledge and belief."

7 MR. WOLOSKY: Can you re-read
8 the pending question.

9 (Record read)

10 A Yes.

11 Q Did you review it before you
12 signed it?

13 A Yes.

14 Q And when you signed it, did you
15 believe it to be true?

16 A Yes.

17 Q And do you anticipate that
18 Lexington will file any additional
19 documents pursuant to this statement?

20 MS. YUSUF: Objection.

21 MR. GIMBEL: Objection to form.

22 Q You can answer.

23 A I'm not going to anticipate
24 anything.

25 Q Okay.

1 Allaham - ATTORNEYS' EYES ONLY

2 Now, on the front page of this
3 document, first page of the document, item
4 number 10, list every foreign principal to
5 whom you will render services in support
6 of the primary registrant. And it says,
7 State of Qatar, Emir, Tamim bin Hamad Al
8 Thani and Qatar Supreme Committee for
9 Delivery and Legacy Sheikh Mohammed bin
10 Hamad Al Thani."

11 Do you see that?

12 A Yes.

13 Q And then beneath that in box
14 number 11, it says, "The registrant began
15 working to promote the 2022 World Cup in
16 Qatar, and then expanded its activities to
17 include fostering better international
18 relations within the Gulf region with the
19 leadership in the Jewish community in the
20 United States."

21 Do you see that?

22 A Yes.

23 Q So my question to you was
24 whether the additional payments from
25 Qatar, that you have declined to identify,

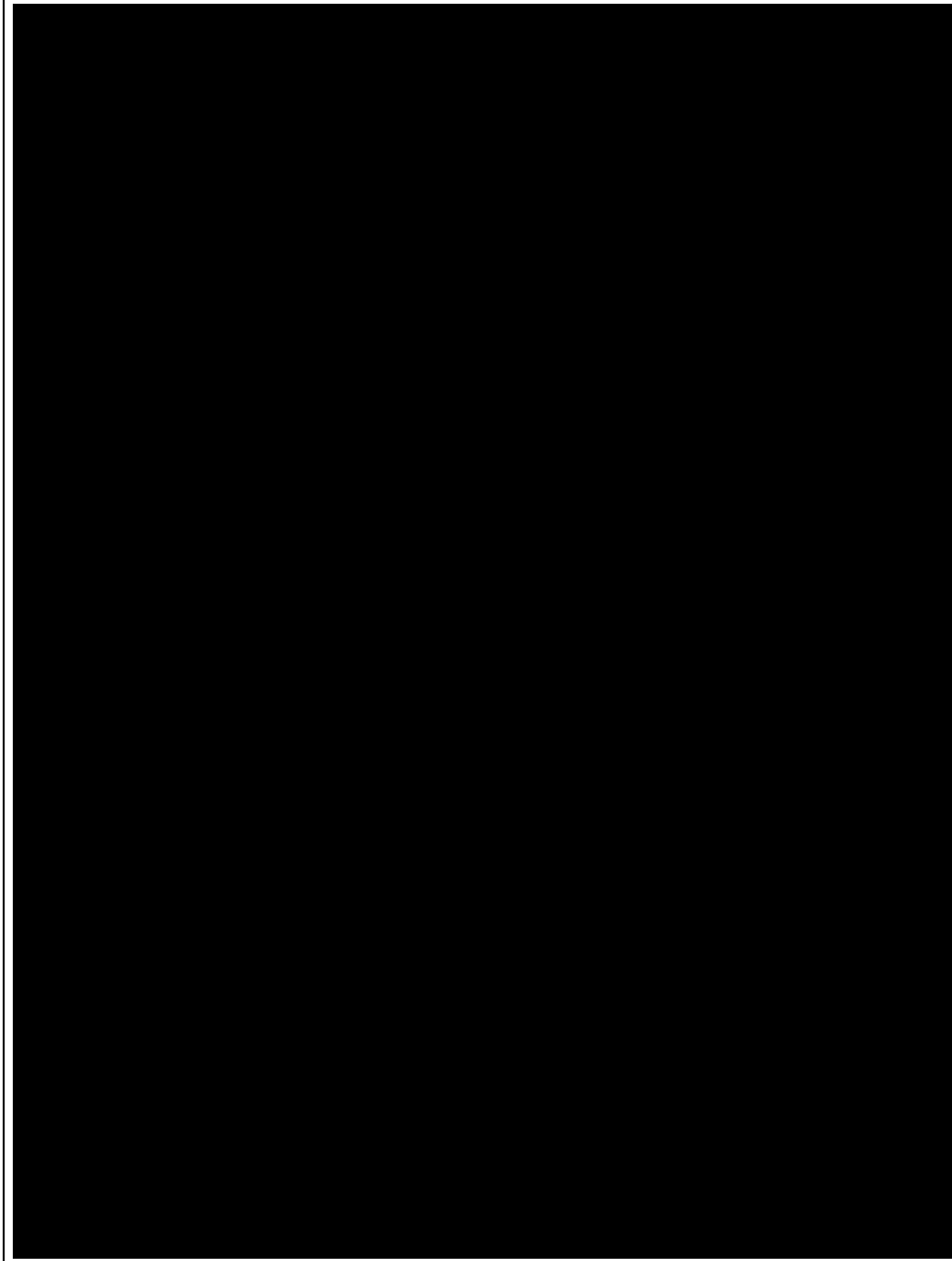
1 Allaham - ATTORNEYS' EYES ONLY
2 relate to activity that is disclosed in
3 this statement?

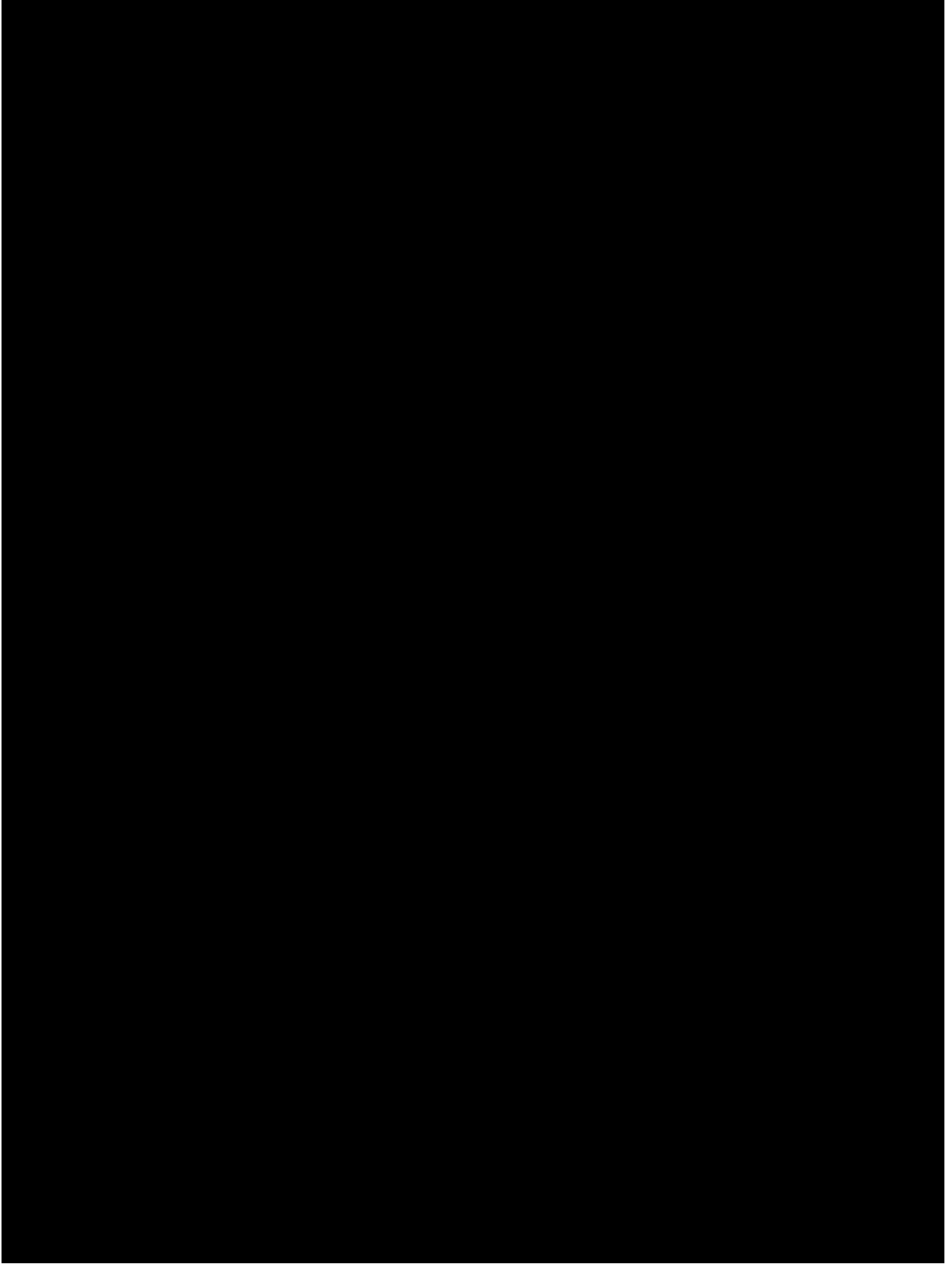
4 MS. YUSUF: Objection to form.
5 Counsel, I think you meant something
6 else but --

7 MR. GIMBEL: I join in that
8 objection.

9 BY MR. WOLOSKY:



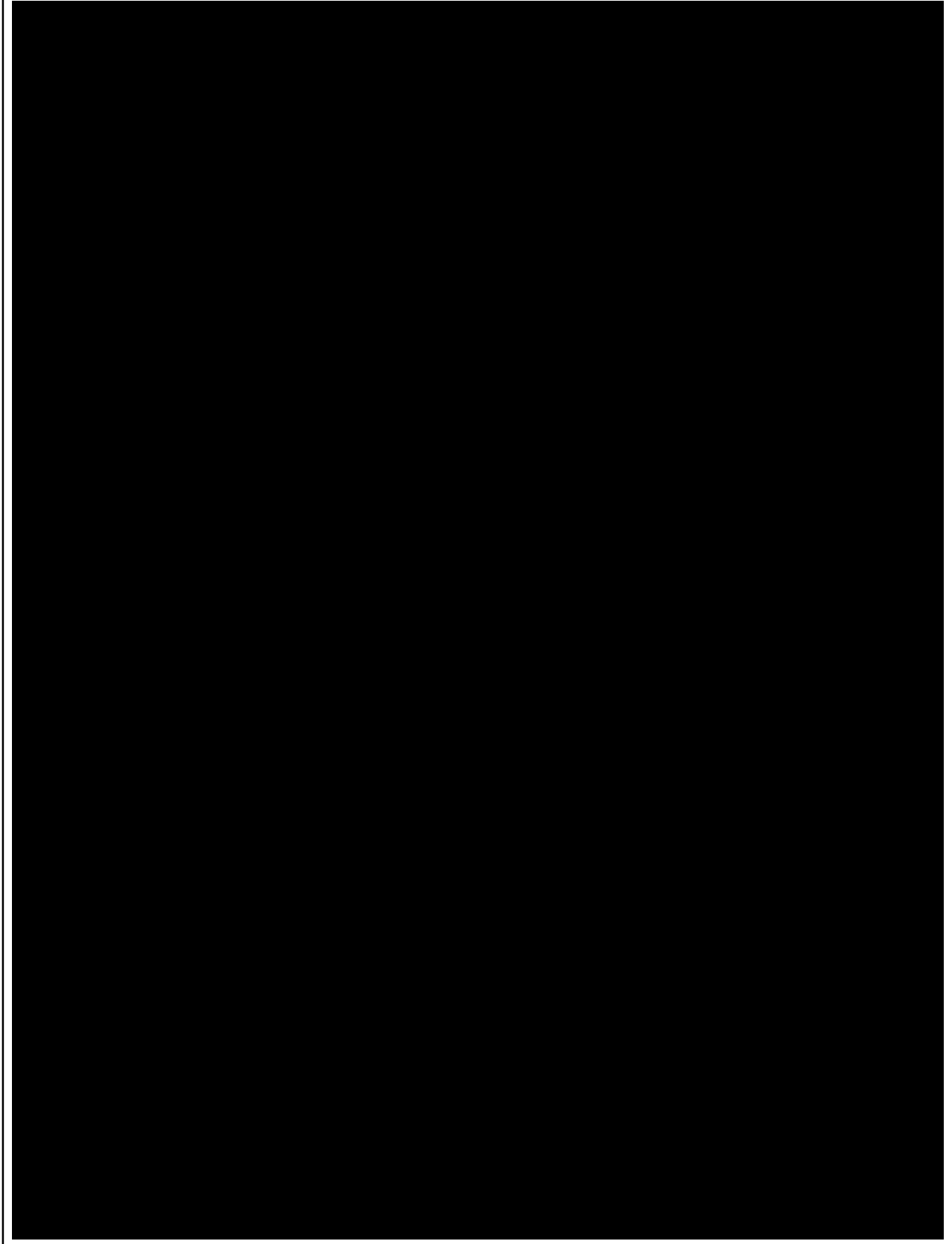


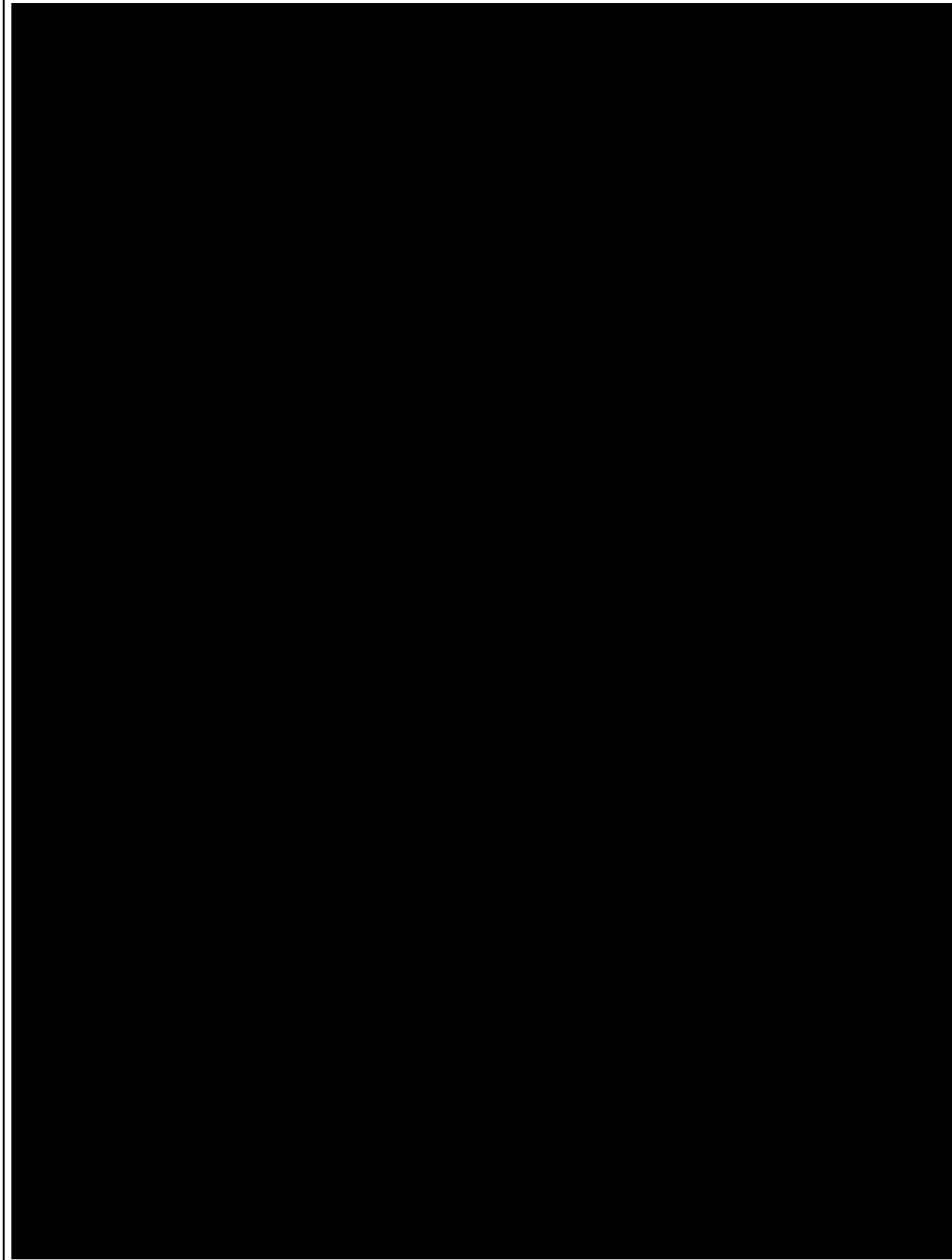


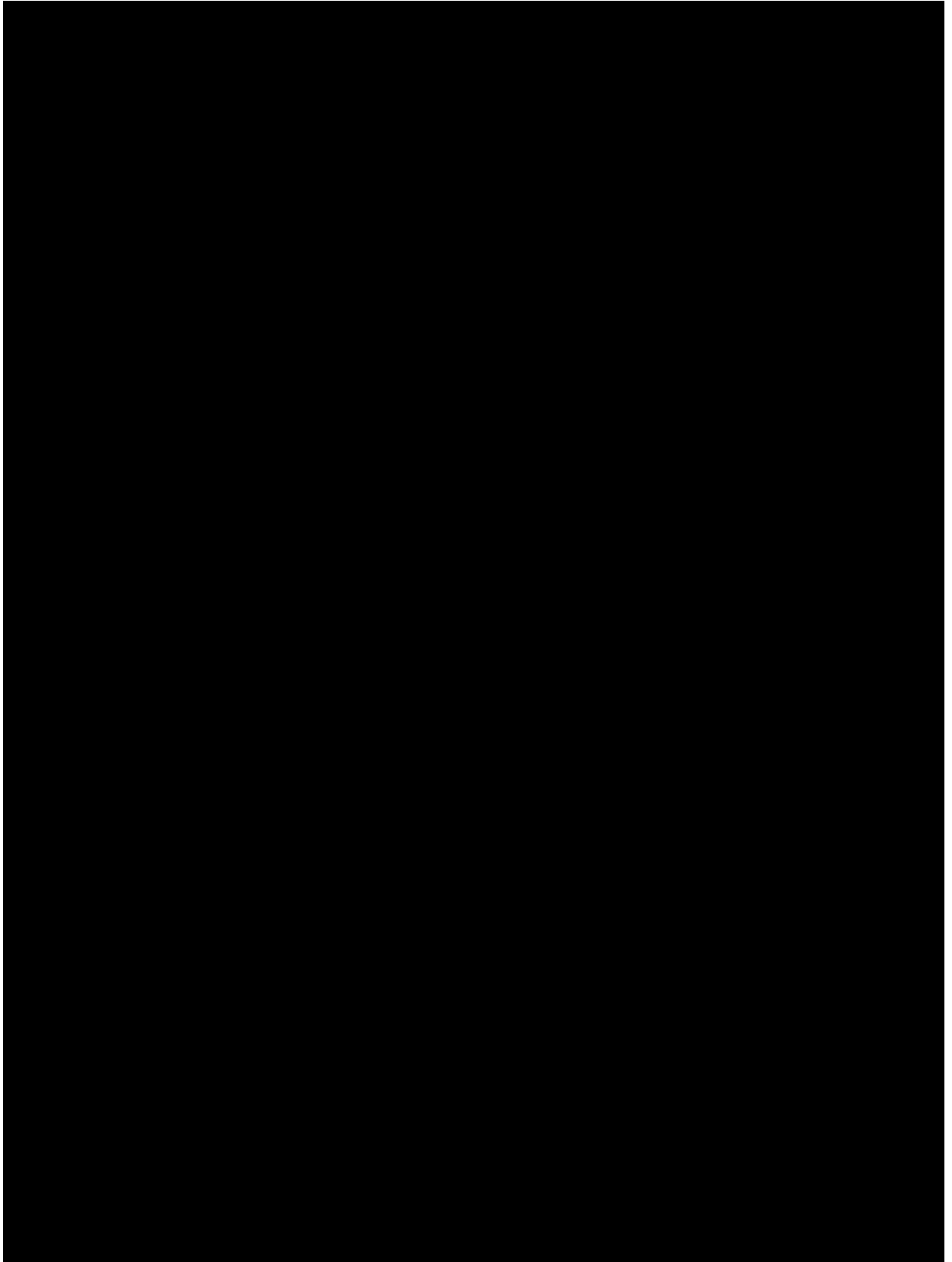
15 Now, in Box 10 it says, it
16 references the Emir Tamim bin Hamad Al
17 Thani.

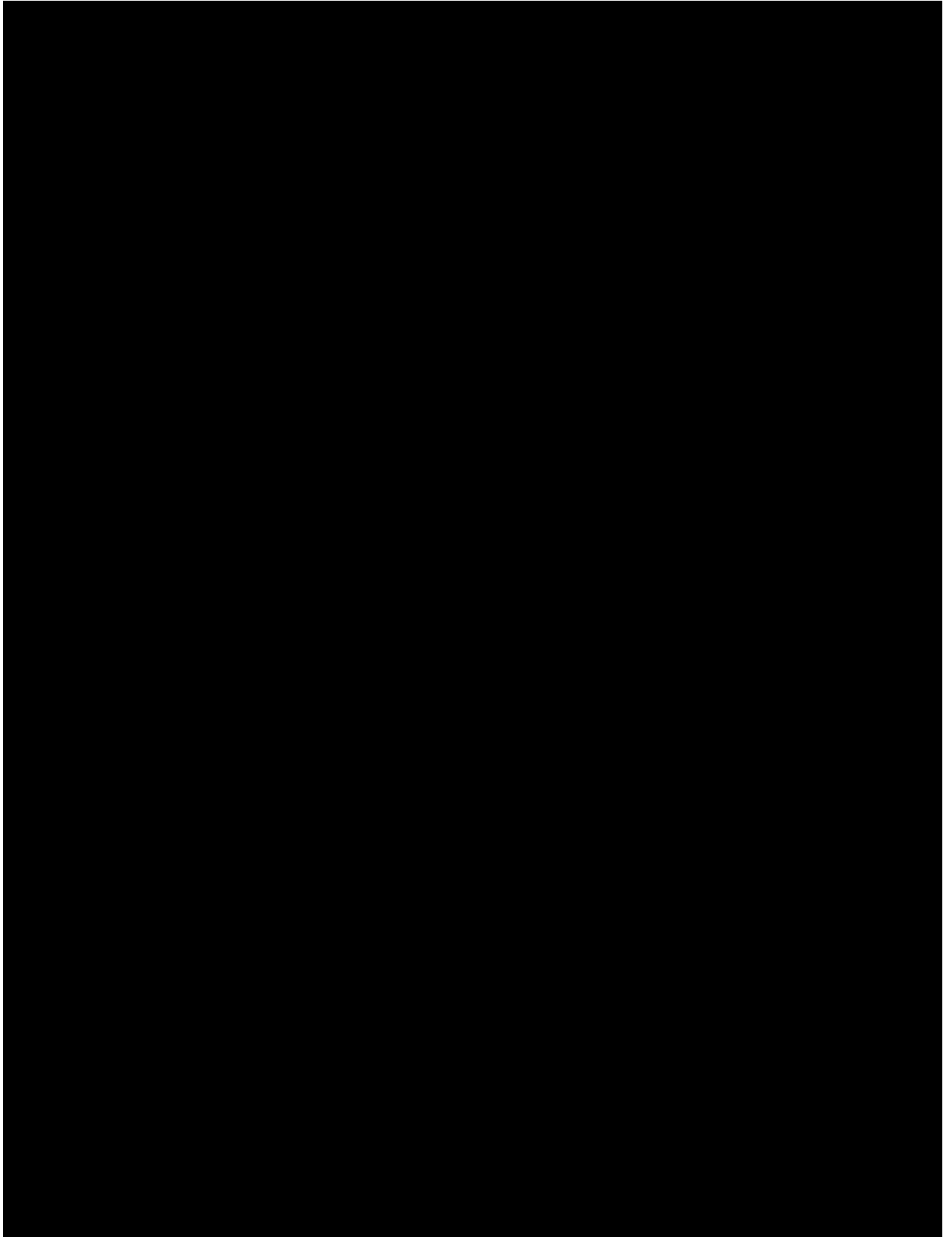
18 Is he your client?

19 A I mean, he is the Emir of Qatar.









1 Allaham - ATTORNEYS' EYES ONLY

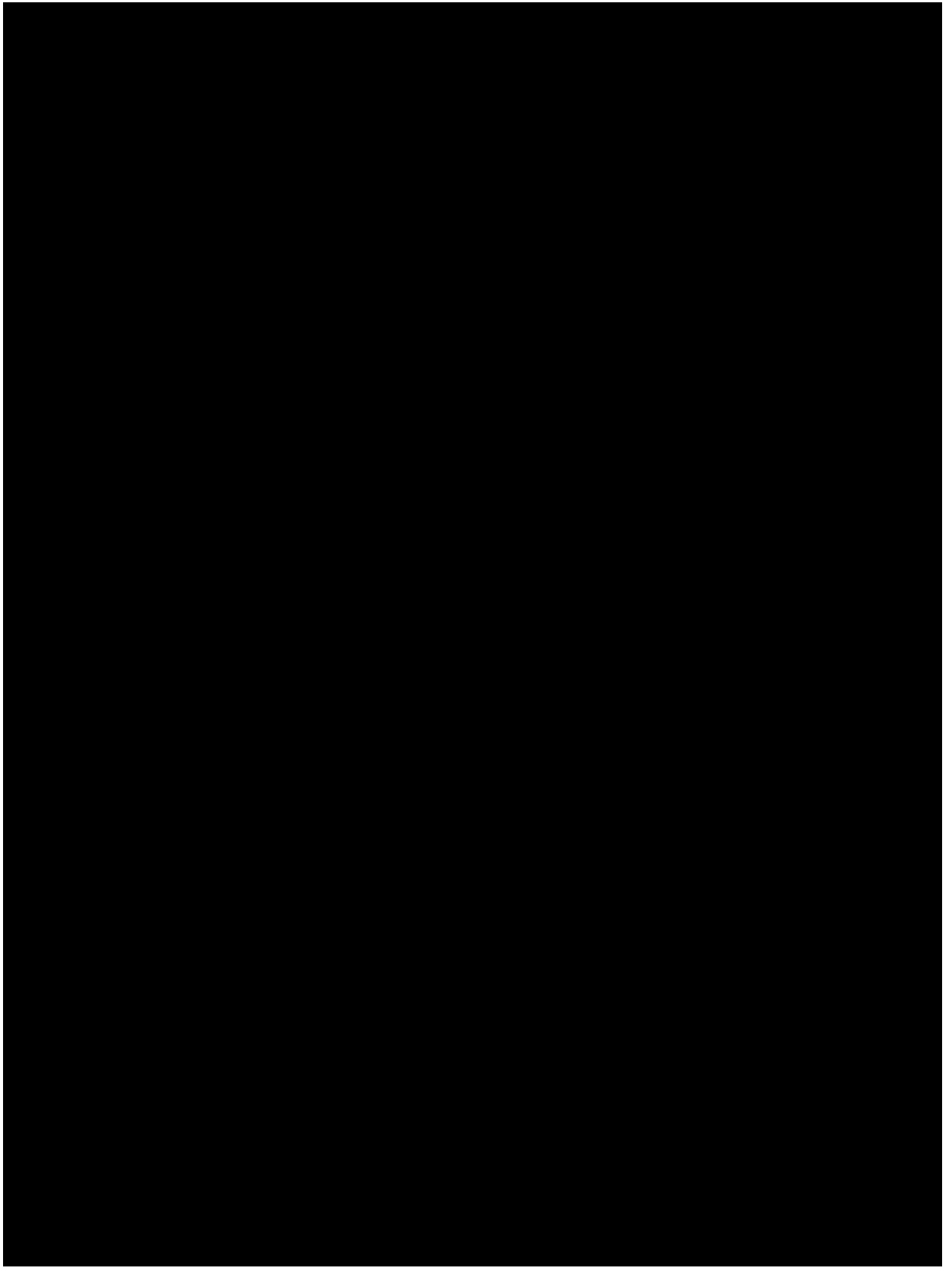
2 Q Okay.

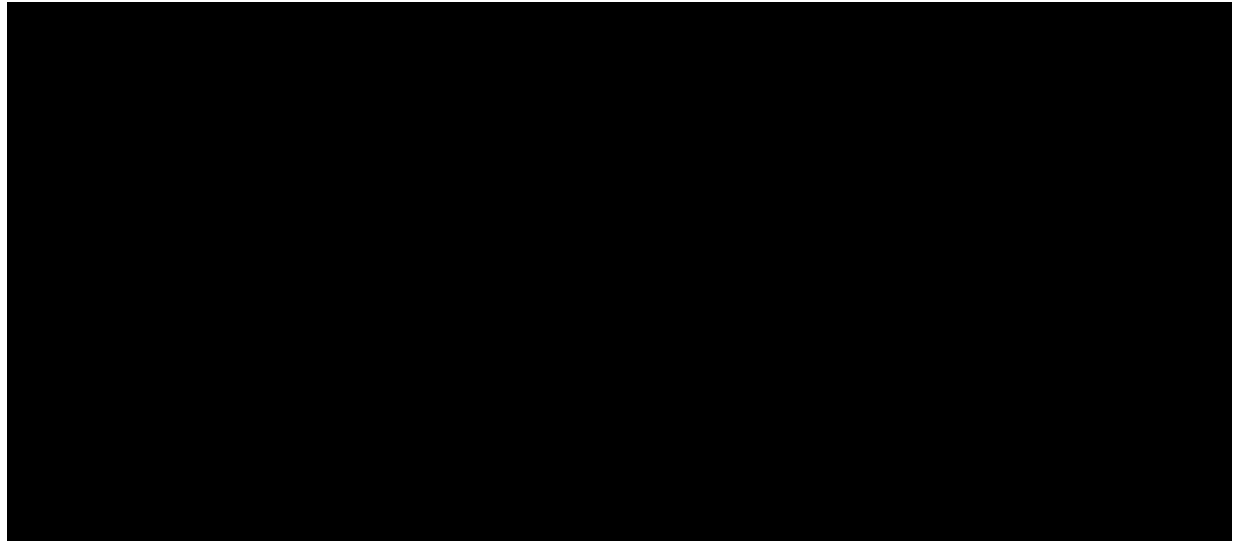
3 Now, the second name in Box 10
4 other than the Emir, is Sheikh Mohammed
5 bin Hamad Al Thani, and there is a
6 reference to the Qatar Supreme Committee
7 for Delivery and Legacy.

8 What is the Qatar Supreme
9 Committee for Delivery and Legacy?

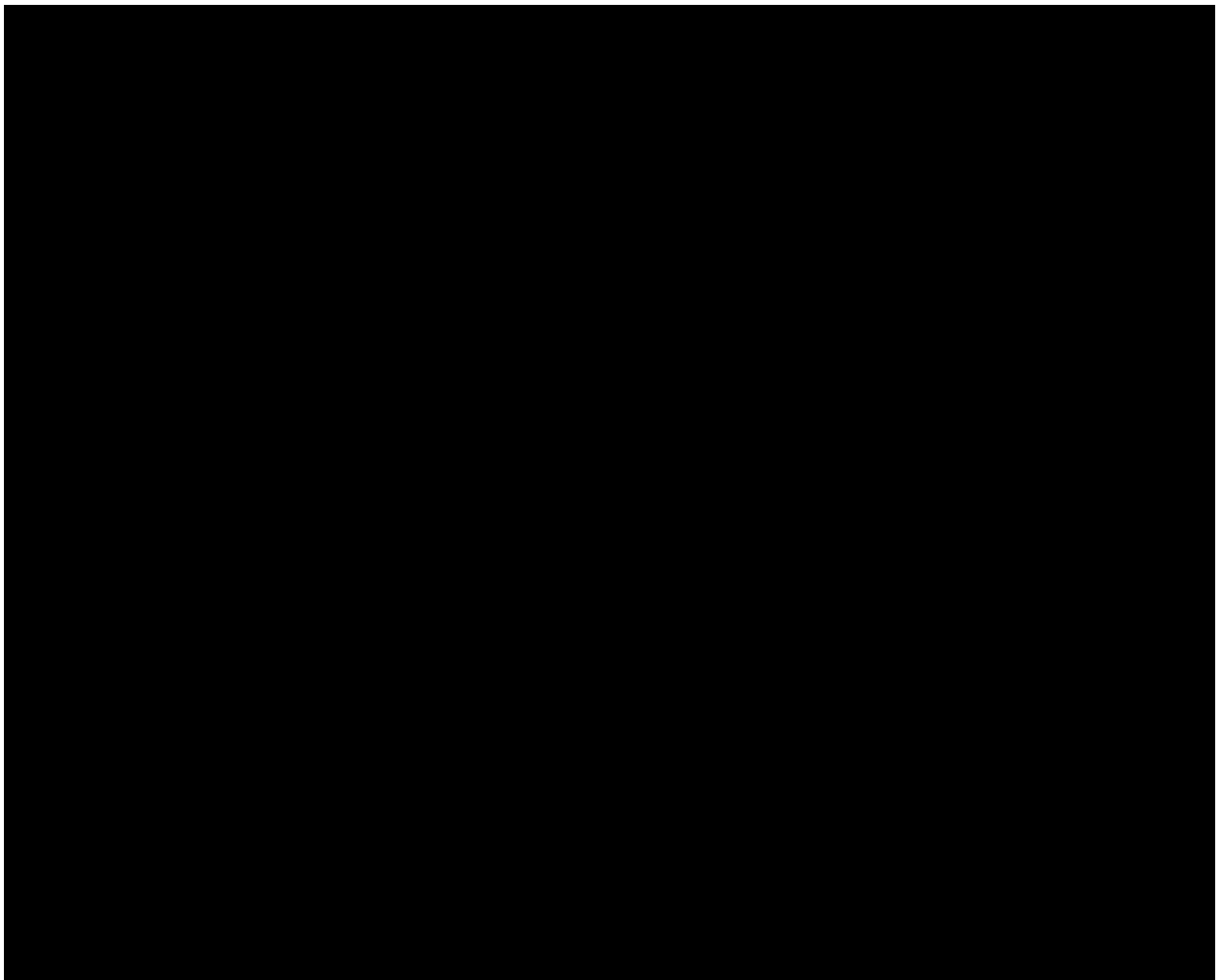
10 A It is the building where it
11 takes the whole preparation for the workup
12 takes place. Planning.

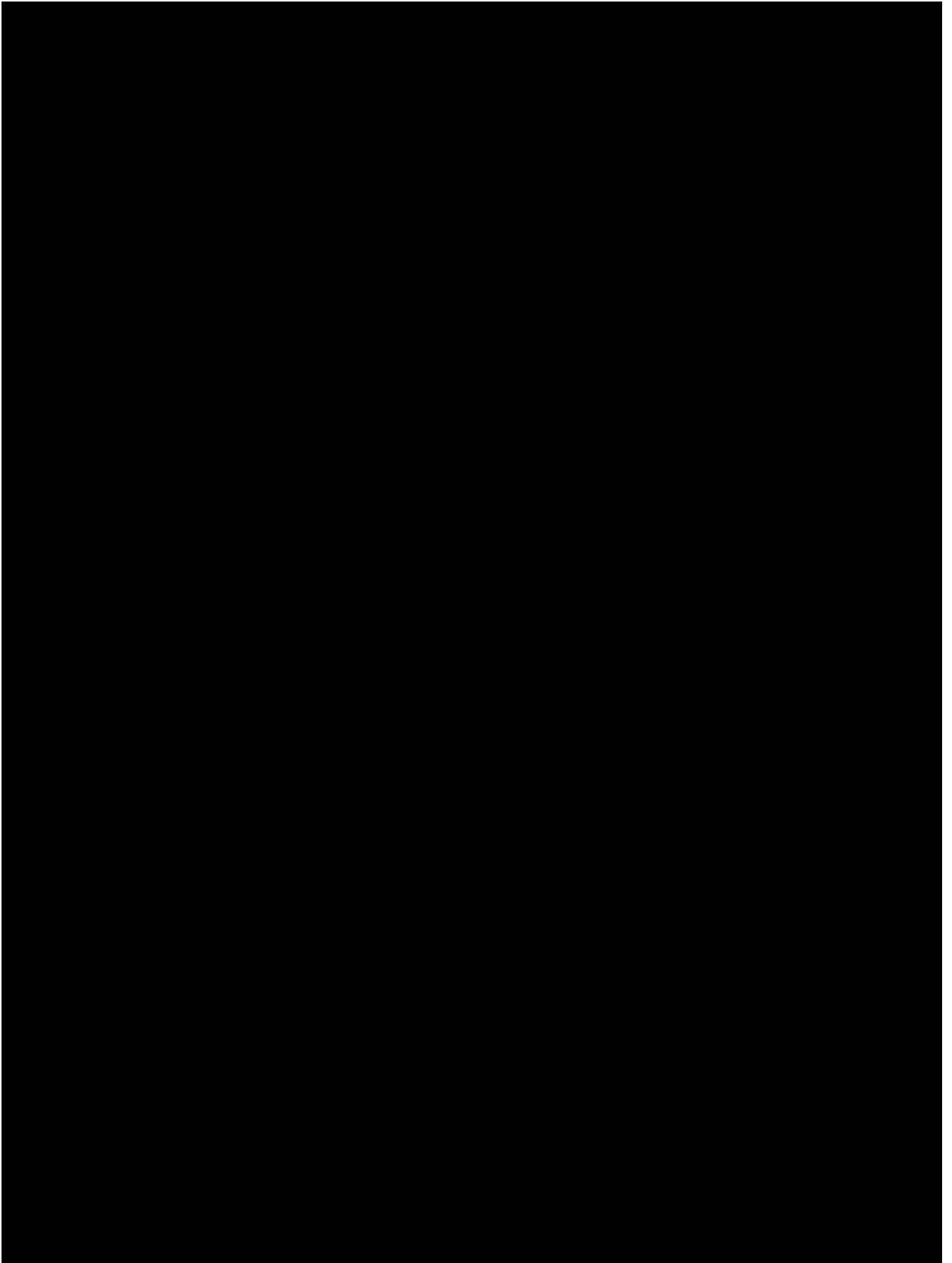


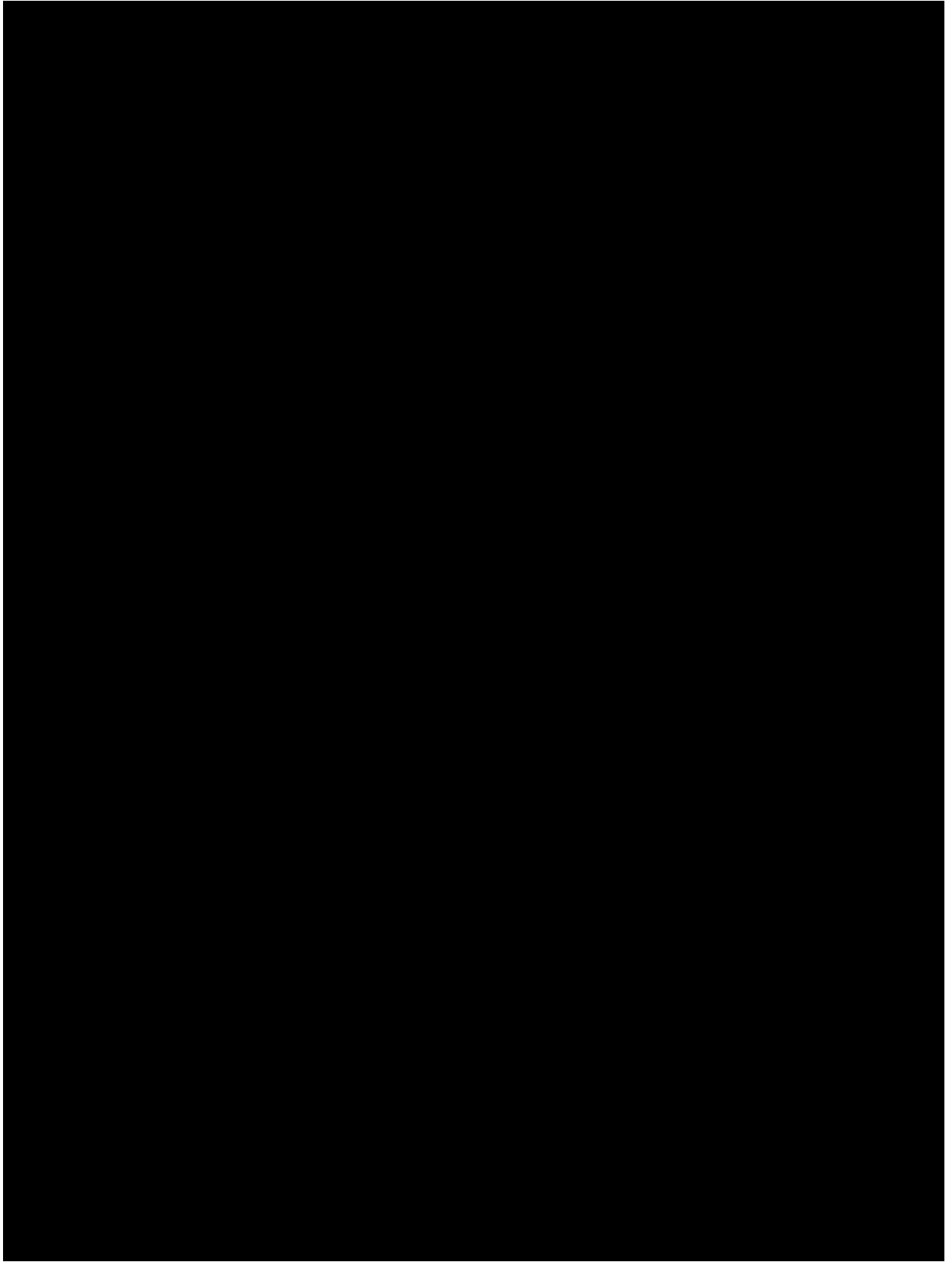


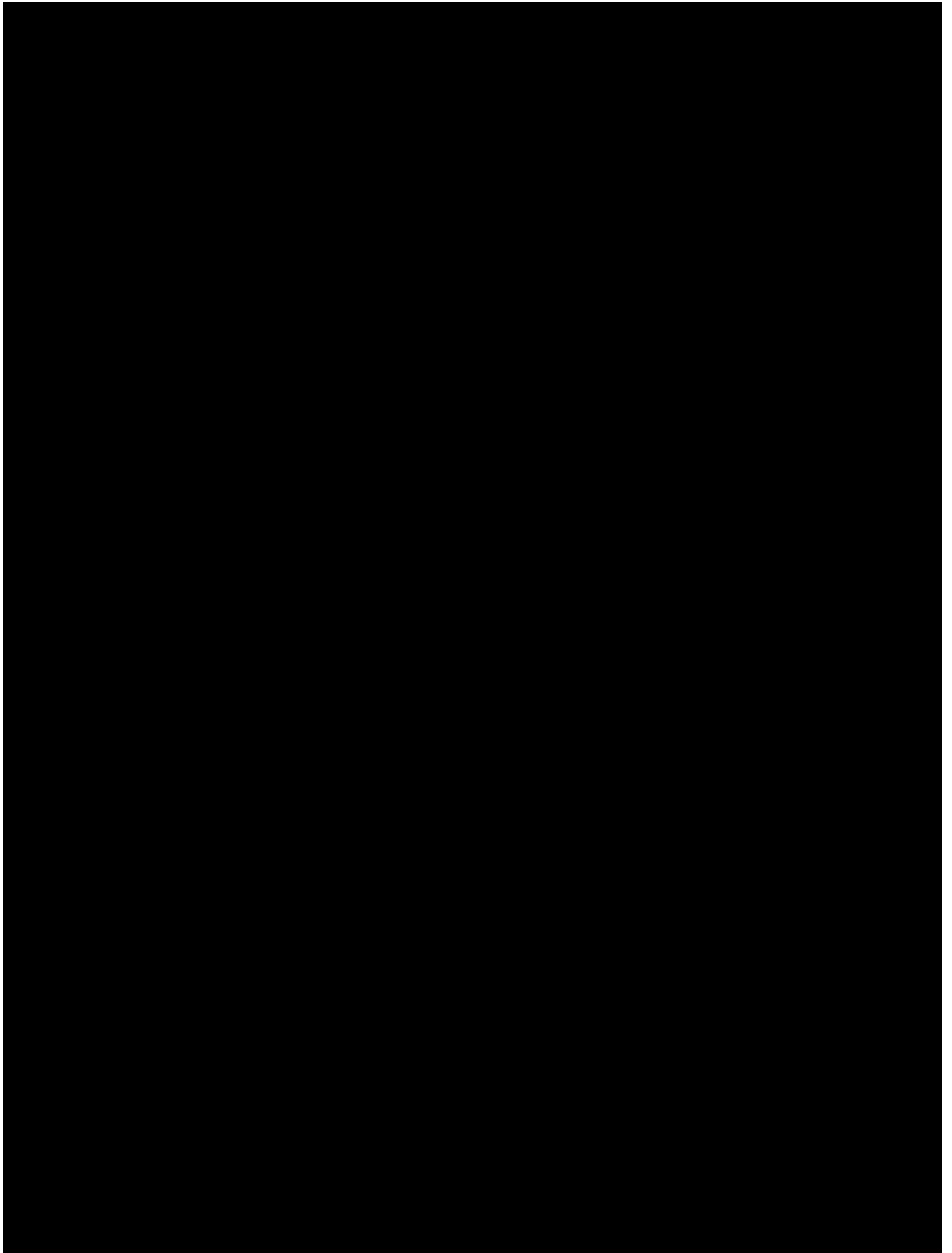


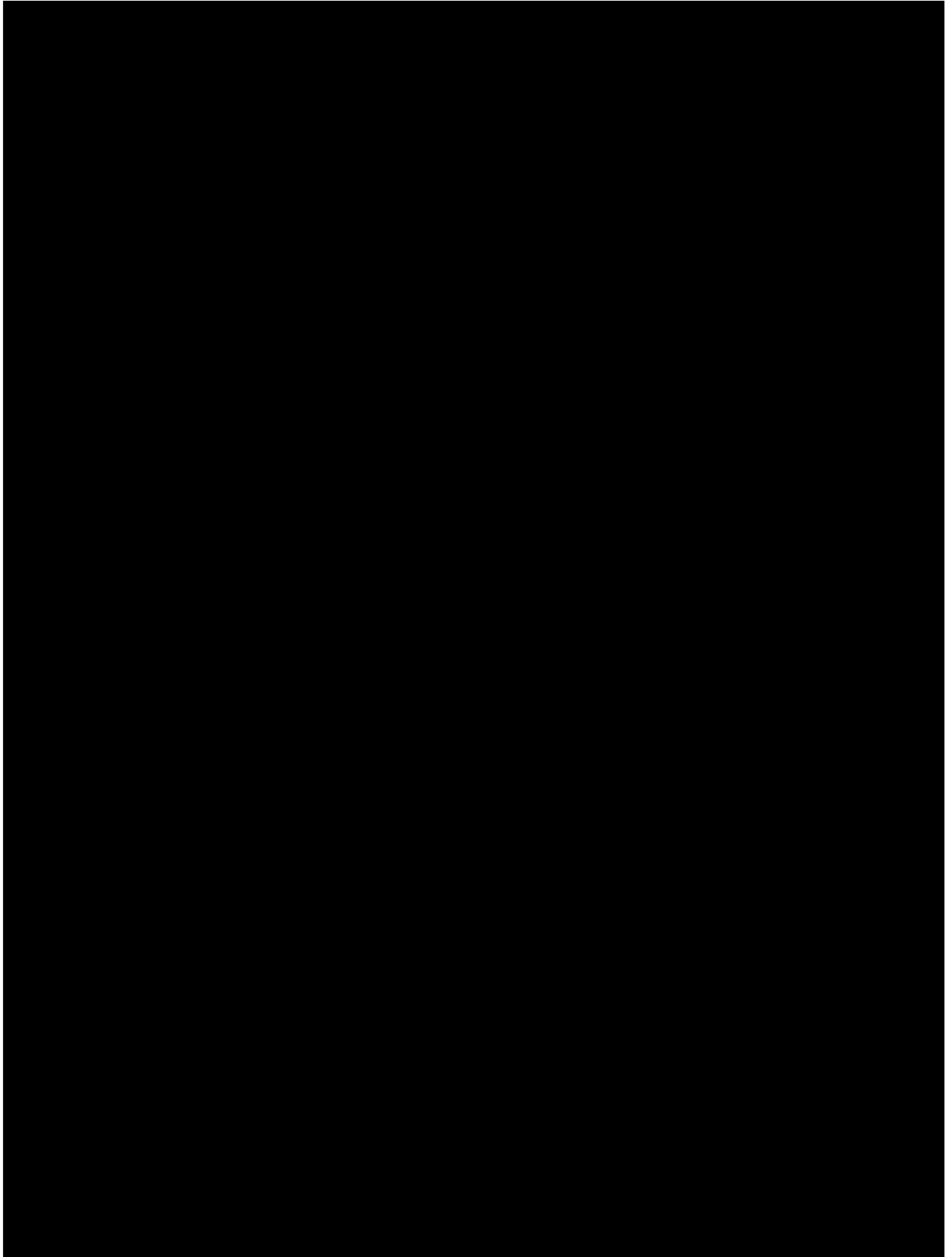
9 Q Now, in your short form FARA
10 registration statement, you refer to MBH.

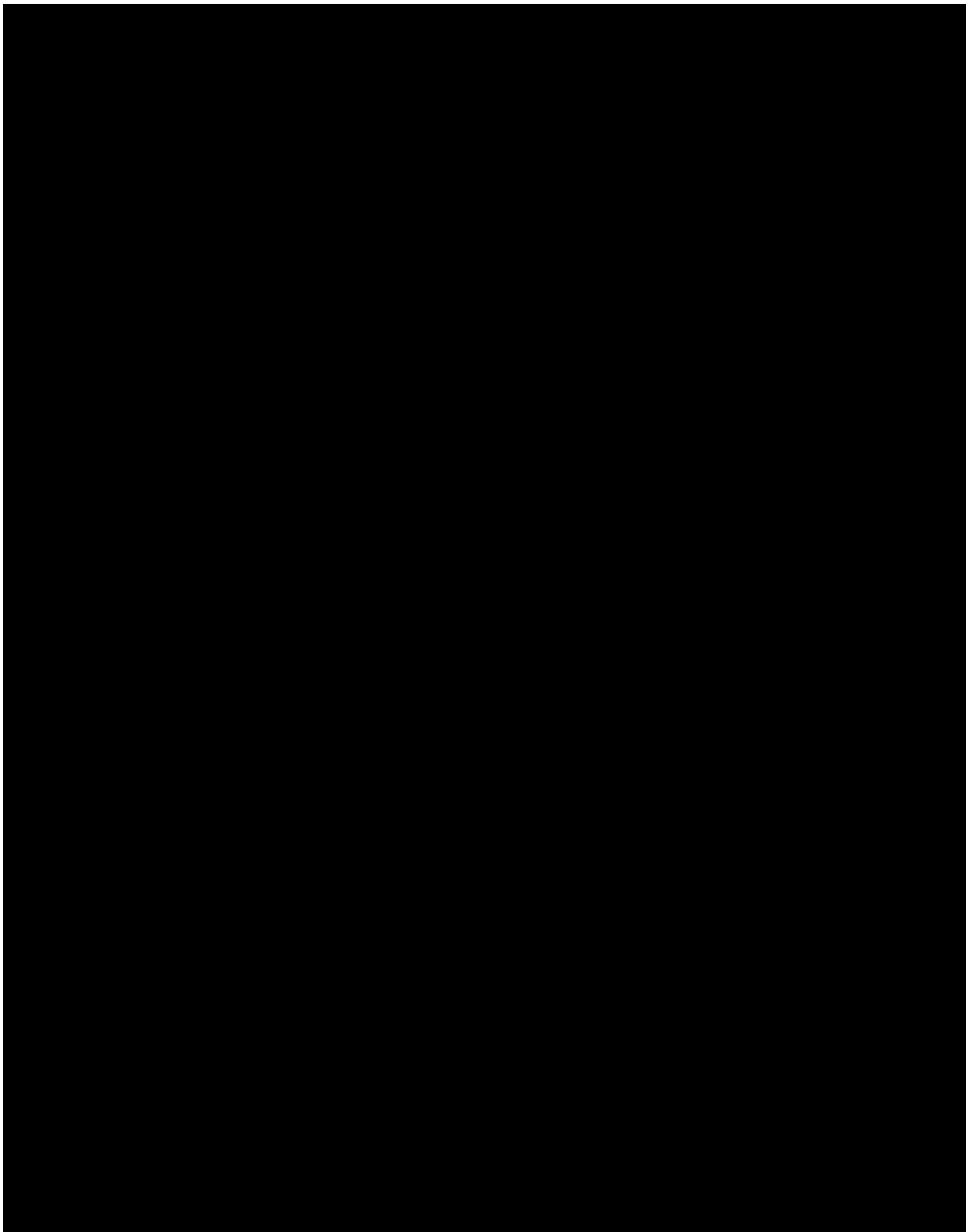












25

MR. WOLOSKY: Can we just take a

1 Allaham - ATTORNEYS' EYES ONLY

2 five-minute break?

3 THE VIDEOGRAPHER: The time is
4 11:16 a.m., and we're going off the
5 record.

6 (Thereupon, a recess was taken,
7 and then the proceedings continued as
8 follows:)

9 THE VIDEOGRAPHER: There is the
10 start of media labeled number three.
11 The time now is 11:24 a.m., and we're
12 back on the record.

13 BY MR. WOLOSKY:

14 Q I'd like to direct your
15 attention back to Exhibit 1, the short
16 form FARA registration statement.

17 Do you see that?

18 A Yes.

19 Q Can you turn to page two, box
20 14.

21 The question reads: What
22 compensation or things of value have you
23 received to date or will you receive for
24 the above services?

25 What additional compensation

1 Allaham - ATTORNEYS' EYES ONLY

2 will you receive for the above services?

3 A I don't know yet.

4 Q Why do you not know?

5 A Because we never had a written
6 contract.

7 Q But you do expect to receive
8 additional compensation for the above
9 services?

10 A Yes.

11 Q Do you expect to make an
12 additional FARA filing in the future?

13 A That will be up to my lawyers.

14 Q I'd like to show you an exhibit
15 that has been marked Exhibit Number 2 for
16 identification purposes.

17 (Whereupon, Registration
18 Statement Pursuant to the Foreign
19 Agents Registration Act of 1938, as
20 Amended, was marked as Allaham Exhibit
21 2 for identification, as of this
22 date.)

23 BY MR. WOLOSKY:

24 Q It is a registration statement
25 filed pursuant to the Foreign Agents

1 Allaham - ATTORNEYS' EYES ONLY
2 Registration Act of 1938. It was filed
3 with the Department of Justice, and signed
4 by you on June 15, 2018, and it contains
5 various exhibits.

6 Do you see that document?

7 A Yes.

8 Q Did you review this document
9 before you signed it?

10 A Yes.

11 Q And did you agree -- do you
12 agree with its contents?

13 A I don't know if I agree or
14 disagree. It is a document my lawyers
15 told me to read, so --

16 Q Is there anything in the
17 document that you believe is factually
18 inaccurate?

19 A I'm not sure.

20 Q Are you aware that you signed it
21 under penalty of perjury?

22 A Yes.

23 Q On page one in box five, 5A,
24 asks for the type of organization of the
25 registrant.

1 Allaham - ATTORNEYS' EYES ONLY

2 Do you see that?

3 A Yes.

4 Q And there are no boxes checked.

5 Why has it been left blank?

6 A I'll ask my lawyer. I have no
7 idea.

8 Q What kind of organization is
9 Lexington Strategies, LLC, what type of
10 entity?

11 A It says LLC.

12 Q So it is an LLC?

13 A It says that, number one.

14 Q Do you know its date and place
15 of organization?

16 A I'm not sure.

17 Q Do you know why that field, 5B,
18 was left blank?

19 A No, I don't.

20 Q Can you turn to page two,
21 please.

22 The top of the page 5G says,
23 >List all partners, officers, or directors
24 of persons performing the functions of an
25 officer or director of the registrant."

1 Allaham - ATTORNEYS' EYES ONLY

2 Do you see that?

3 A Yes.

4 Q Listed here is Lauren Allaham
5 who I believe you testified is your wife.

6 Is that correct?

7 A Yes.

8 Q And what functions does she
9 perform for Lexington Strategies, LLC?

10 A It says managing director.

11 Q Well, that's her position, but
12 what functions does she perform?

13 A Support me.

14 Q Does she engage in
15 communications with officials of the State
16 of Qatar?

17 A Not directly, no.

18 Q Does she engage in
19 communications with Nick Muzin?

20 A No. I mean communications in
21 terms of what sort of communication?

22 Q E-mails, text messages, phone
23 calls?

24 A I mean, I'm sure when she had a
25 baby he wished her "mazel tov."

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Any communications relating to
3 the work performed by Lexington for the
4 State of Qatar?

5 A No.

6 Q Were her documents and
7 electronically stored information searched
8 in responding to the subpoenas served on
9 you?

10 MS. YUSUF: Objection.

11 A No.

12 Q They were not searched?

13 A No.

14 Q Does Lexington Strategies, LLC,
15 have any other employees or officials
16 other than you and Lauren Allaham?

17 A No.

18 Q Who is Emma Hitchcock?

19 A She is the house assistant, I
20 would say.

21 Q Does she do work for your
22 businesses or just personal work?

23 A I mean, for the family, usually
24 helps me write, if I need to write
25 something in English. My English is not

1 Allaham - ATTORNEYS' EYES ONLY

2 perfectly good in writing.

3 Q So she will occasionally perform
4 professional or --

5 MR. WOLOSKY: Strike that.

6 Q She will occasionally perform
7 services for you that are in furtherance
8 of your business interests?

9 A Personal or business, if I ask
10 her.

11 Q And did she perform any work in
12 furtherance of your work for Qatar?

13 A I'm not sure.

14 Q Were her documents and
15 electronically stored information searched
16 in response to the subpoenas that were
17 served upon you?

18 A I'm not sure.

19 Q Does Emma Hitchcock occasionally
20 issue statements on your behalf?

21 A I mean, she -- not often, no. I
22 have never issued --

23 Q But occasionally?

24 A I don't know about occasionally.
25 The first time was the one that you named.

1 Allaham - ATTORNEYS' EYES ONLY

2 The statement.

3 Q You're referring to the article
4 from Politico --

5 A Yes.

6 Q -- that we talked about earlier?

7 A Yes.

8 Q Did she ever issue statements to
9 Tablet on your behalf?

10 A No, that day, I have to say, I
11 was in the hospital with my wife and I was
12 getting a lot of phone calls.

13 So I would not say she is. And
14 this is -- my lawyer is involved in it,
15 and my lawyer.

16 MS. YUSUF: Objection.

17 Don't testify to anything that's
18 privileged. You can answer his
19 question, but don't testify to
20 anything privileged.

21 A She does not do it -- she did
22 not do it without my lawyers's
23 instructions.

24 MR. WOLOSKY: Can you read the
25 pending question?

1 Allaham - ATTORNEYS' EYES ONLY

2 (Record read)

3 A Yes.

4 Q On the same page two, 5J reads,
5 "Give a complete statement of the
6 ownership and control of the registrant."
7 And it says, "The managing director,"
8 meaning Miss Allaham, "and the member,"
9 meaning you, "co-owned Lexington
10 Strategies, LLC."

11 Do you see that?

12 A Yes.

13 Q What percentages do you each own
14 of Lexington Strategies, LLC?

15 A I don't know off the top of my
16 head.

17 Q Who would know?

18 A I will find out and get back to
19 you.

20 Q Would your accountant know that?

21 A Yes.

22 Q Would Miss Allaham know that?

23 A No, the accountant probably.

24 Q Can you turn to page three.

25 Now, we've already discussed the

1 Allaham - ATTORNEYS' EYES ONLY
2 Emir and MBH and their relationship to the
3 work performed by you that is the subject
4 matter of what's called the short form
5 registration which is Exhibit 1.

6 Is it fair to say that the
7 work -- their relationship to the work
8 that was performed by Lexington Strategies
9 was the same as the work that was the
10 subject of your previous testimony
11 concerning the short form registration
12 statement?

13 MR. GIMBEL: Objection to form.

14 A I'm not understanding the
15 question.

16 Q That's because FARA forms are
17 very complicated.

18 I'll come back to it.

19 Do you see in box eight it says
20 activities?

21 A Yes.

22 Q The question reads, "In addition
23 to the activities described in any Exhibit
24 B to this statement, will you engage or
25 are you engaging now in activity on your

1 Allaham - ATTORNEYS' EYES ONLY
2 own behalf which benefits any or all of
3 your foreign principals."

4 Do you see that?

5 A Yes.

6 Q And then it says yes or no, but
7 there is no box checked.

8 Do you see that?

9 A Yes.

10 Q Do you know why no box is
11 checked?

12 A No.

13 Q Can you answer the question?

14 A I don't have any further
15 engagement.

16 Q So the answer is effectively no,
17 then?

18 A Yes. Do you want me to check it
19 for you? I'll check it.

20 Q Now, Exhibit B, can you flip to
21 Exhibit B.

22 A Where is Exhibit B? Which one
23 is B? They are not marked.

24 MS. YUSUF: Keep flipping.

25 Q Do you see Exhibit B?

1 Allaham - ATTORNEYS' EYES ONLY

2 I'm sorry. It's towards the
3 end. As I said, FARA statements are
4 complicated.

5 MS. YUSUF: Too far. Go back.

6 A Yes, I see B.

7 Q Okay.

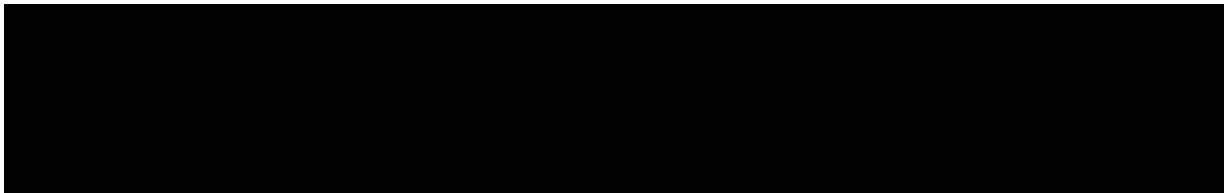
8 Do you see about two-thirds of
9 the way down the page it says, "Check
10 appropriate box"?

11 A Yes.

12 Q And then it gives you choices,
13 four, five, or six. Four asks you, in
14 substance, whether your agreement is
15 pursuant to a formal written contract.
16 You didn't check that box.

17 Is that because your agreement
18 with Qatar described in this statement is
19 not pursuant to a formal written contract?

20 A My lawyers did this so I cannot
21 answer you why and why not. It is not --
22 I'm not an expert on filing.



[REDACTED]

3 Q Box number five says, "There is
4 no formal written contract. The agreement
5 has resulted from an exchange of
6 correspondence."

7 Do you see that?

8 A Yes.

9 Q Was your agreement the result of
10 an exchange of correspondence?

11 A I think I would like my lawyer
12 to answer that question because he knows
13 more about it.

14 Q Well, I'm asking you this
15 question because --

16 A It looks to me that I should
17 check it. I'll check it. I checked it.

18 Q So there was an exchange of
19 correspondence between you and your
20 foreign principal that led to your
21 engagement?

22 A It was not correspondence, no,
23 it was more of an oral meeting agreement.

24 MR. GIMBEL: I'm going to object
25 to the question. It misstated his

1 Allaham - ATTORNEYS' EYES ONLY

2 testimony.

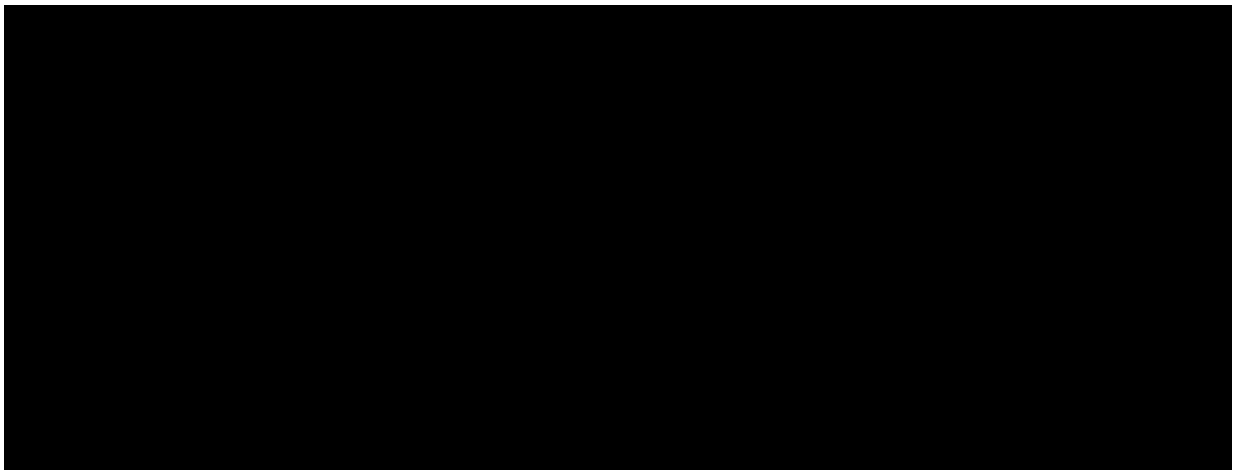
3 Q Box six asks whether the
4 agreement between the registrant and the
5 foreign principal is the result of neither
6 a formal written contract nor an exchange
7 of correspondence.

8 Do you see that?

9 A I see that.

10 Q Now, is that accurate as to your
11 situation and your engagement by the State
12 of Qatar?

13 A Again, I should refer this to my
14 lawyer because they would answer -- they
15 have been involved in this a lot more than
16 I have been in this. So they can answer
17 better than me. I'm not going to be able
18 to check boxes or uncheck boxes.



1 Allaham - ATTORNEYS' EYES ONLY

2 Q Why wasn't this box checked
3 then?

4 A I think my lawyer should answer
5 that.

6 Q For these situations, the FARA
7 form instructs you to give a complete
8 description of the terms and conditions of
9 the oral agreement or understanding, its
10 duration, the fees and expenses, if any,
11 to be received.

12 You didn't do that?

13 MS. YUSUF: Objection to form.

14 A What are you reading?

15 Q Box number six, which applies in
16 situations where there is neither a formal
17 written contract nor exchange of
18 correspondence.

19 Do you see that?

20 A I see that.

21 Q The FARA form indicates that in
22 this situation you're supposed to give a
23 complete description of the terms and
24 conditions of the oral agreement.

25 Do you see that?

1 Allaham - ATTORNEYS' EYES ONLY

2 MS. YUSUF: Counsel, you're
3 leaving a word out. It says below --
4 "complete description below."

5 A Yes.

6 Q Okay.

7 MS. YUSUF: And there appears to
8 be on the document a description
9 below. So I just want to be clear
10 because the record won't reflect.

11 Q Counsel is correct. So counsel
12 is directing us to box seven.

13 Do you see box seven?

14 A I don't see a box.

15 Q I'm sorry. It's question seven.
16 "Describe fully the nature and method of
17 performance of the above-indicated
18 agreement or understanding."

19 Do you see that?

20 A Yes.

21 Q And now you wrote, "The nature
22 of the work began to promote the 2022
23 World Cup in Qatar, in the United States
24 and Qatar. The understanding was expanded
25 to include relationship building with the

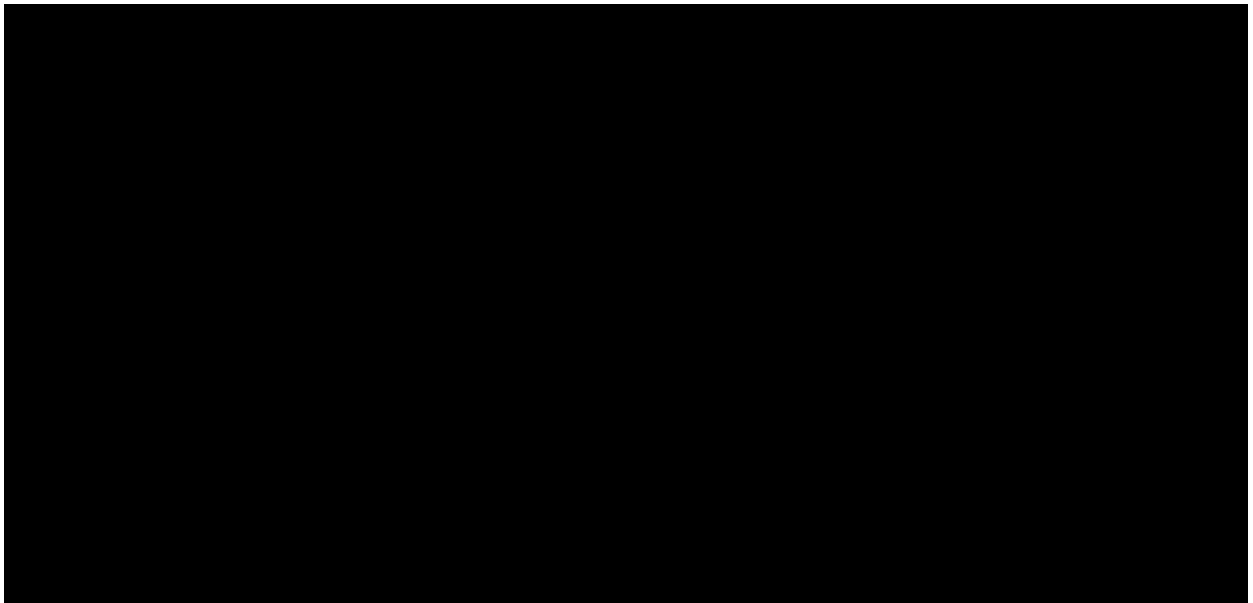
1 Allaham - ATTORNEYS' EYES ONLY
2 leadership in the Jewish community in the
3 United States to better international
4 relations. Methods of performance
5 included peaceful means of community
6 engagement, charitable contributions, and
7 arranging meetings in the United States
8 and Qatar. The initial grant was for USD
9 1.45 million for compensation,
10 disbursements, and operating expenses."

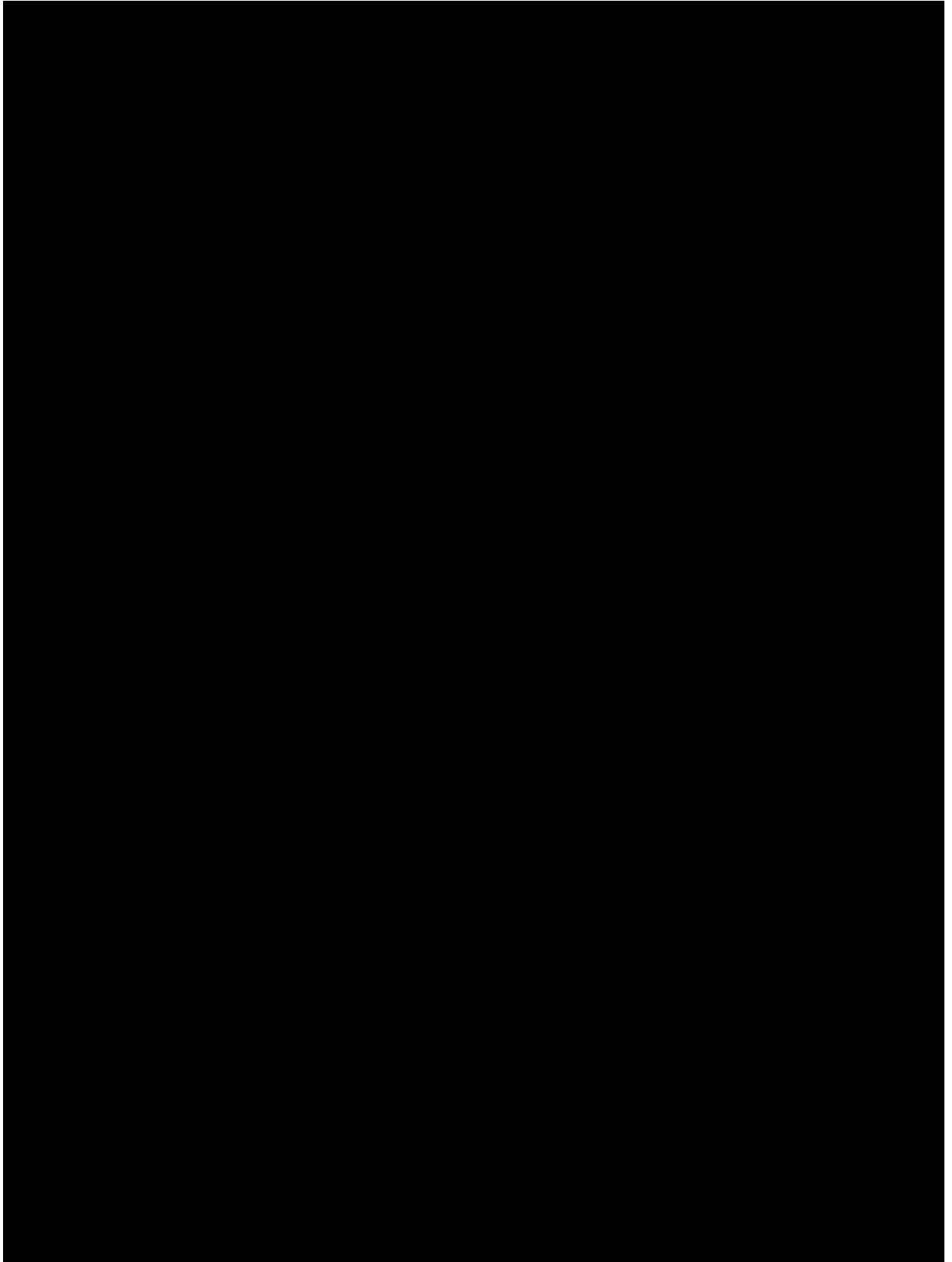
11 Do you see that?

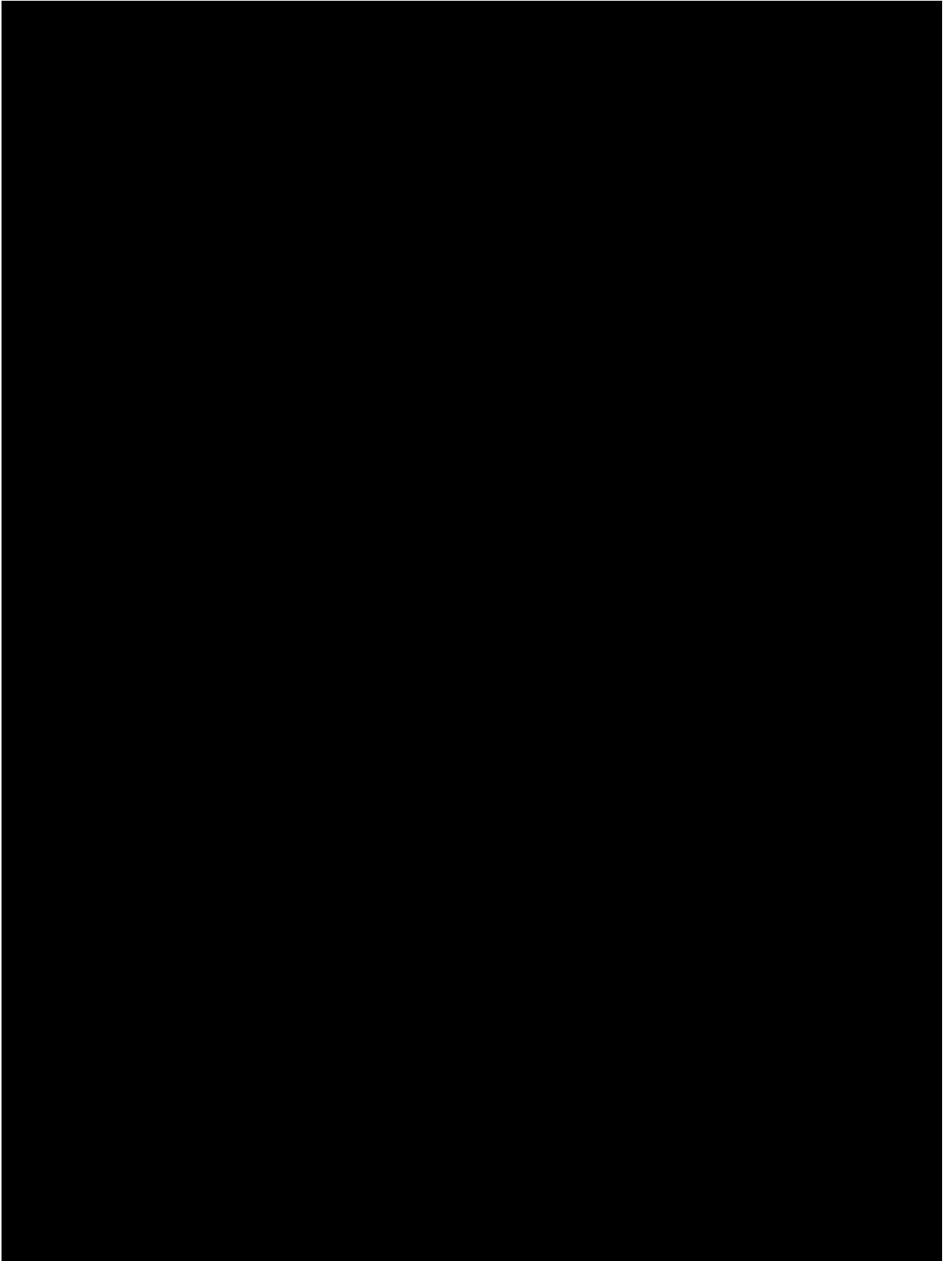
12 A Yes.

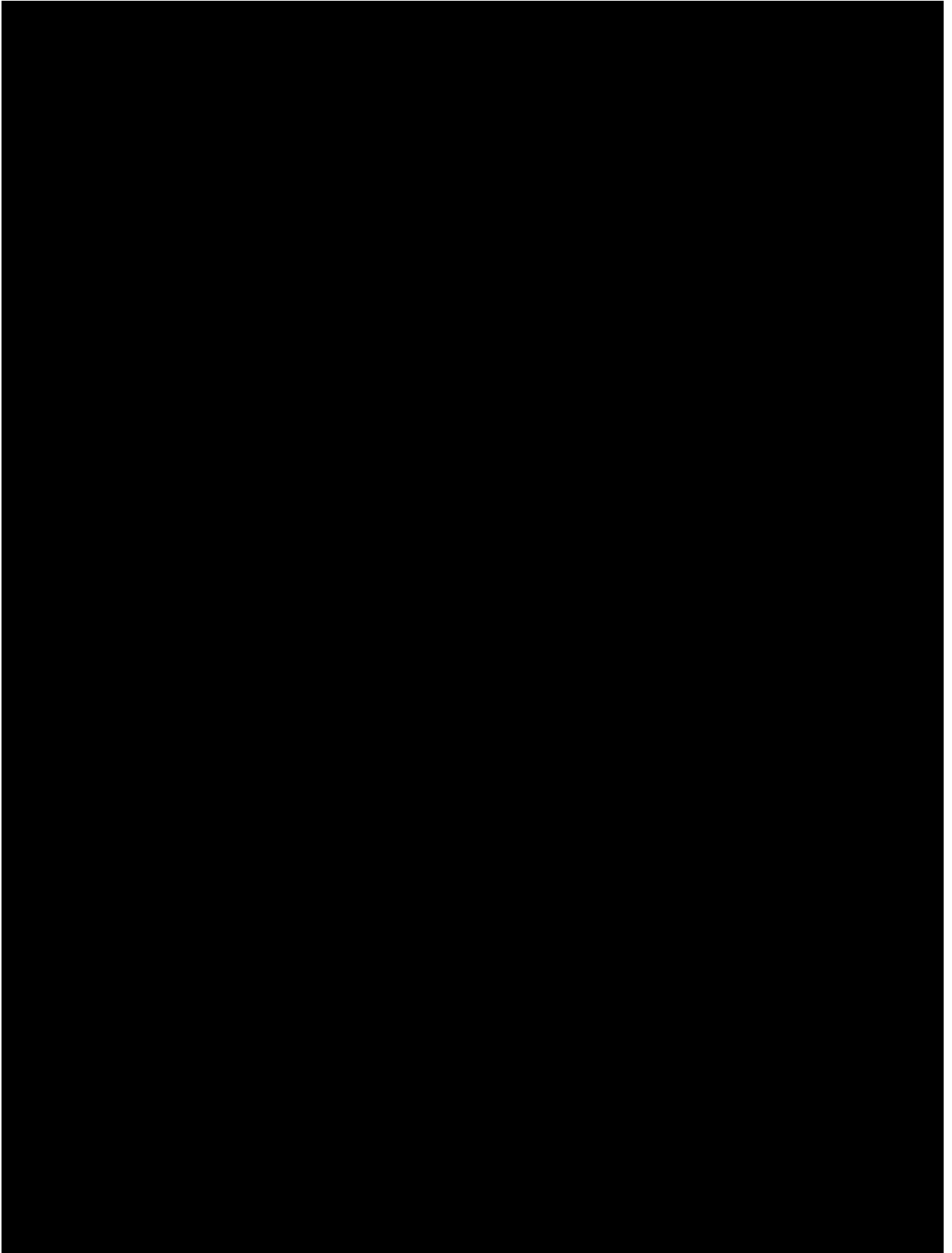
13 Q Now, this answer reflects that
14 the work began to promote the 2022 World
15 Cup, correct?

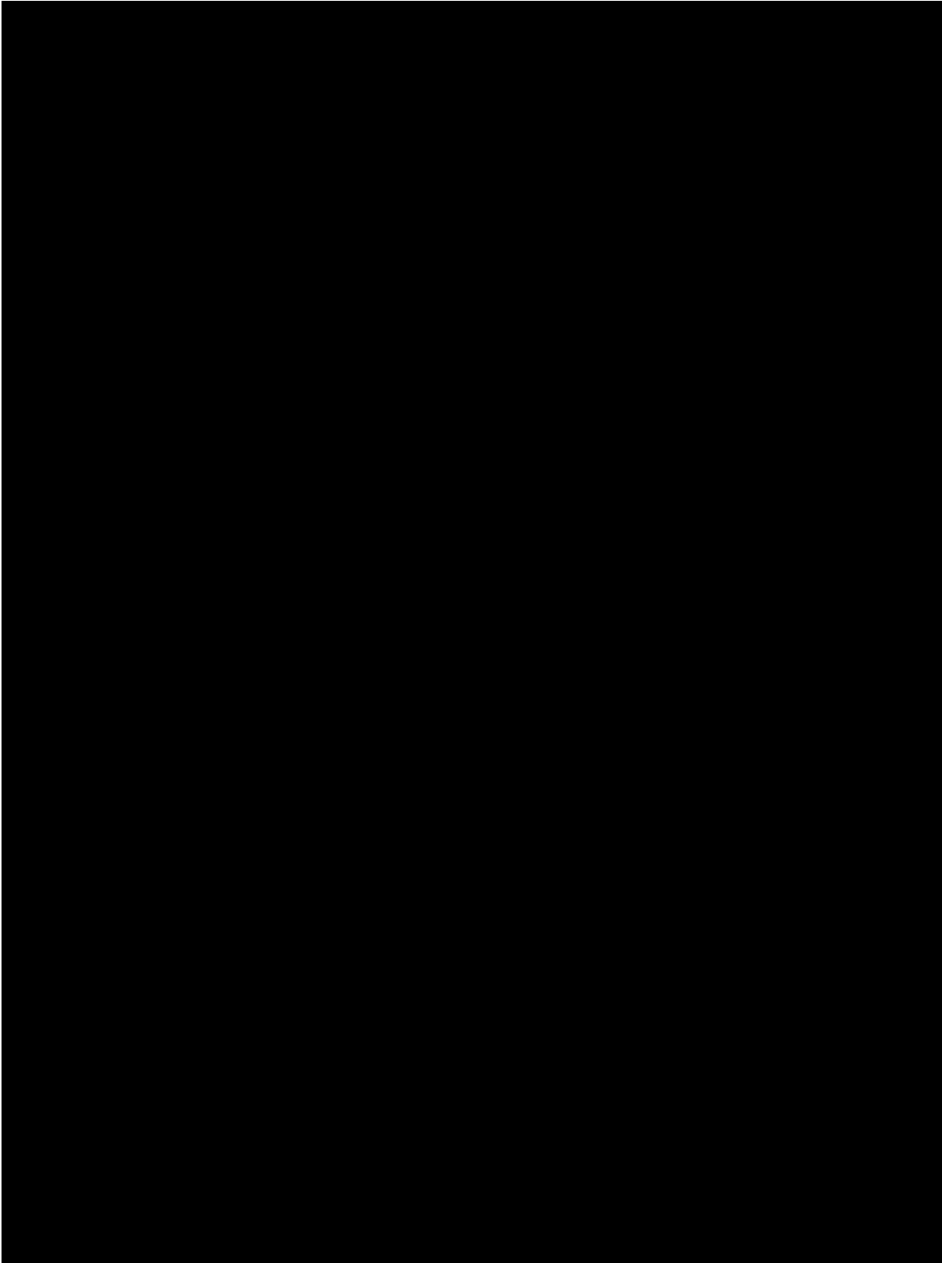
16 A This is what it reads, yes.

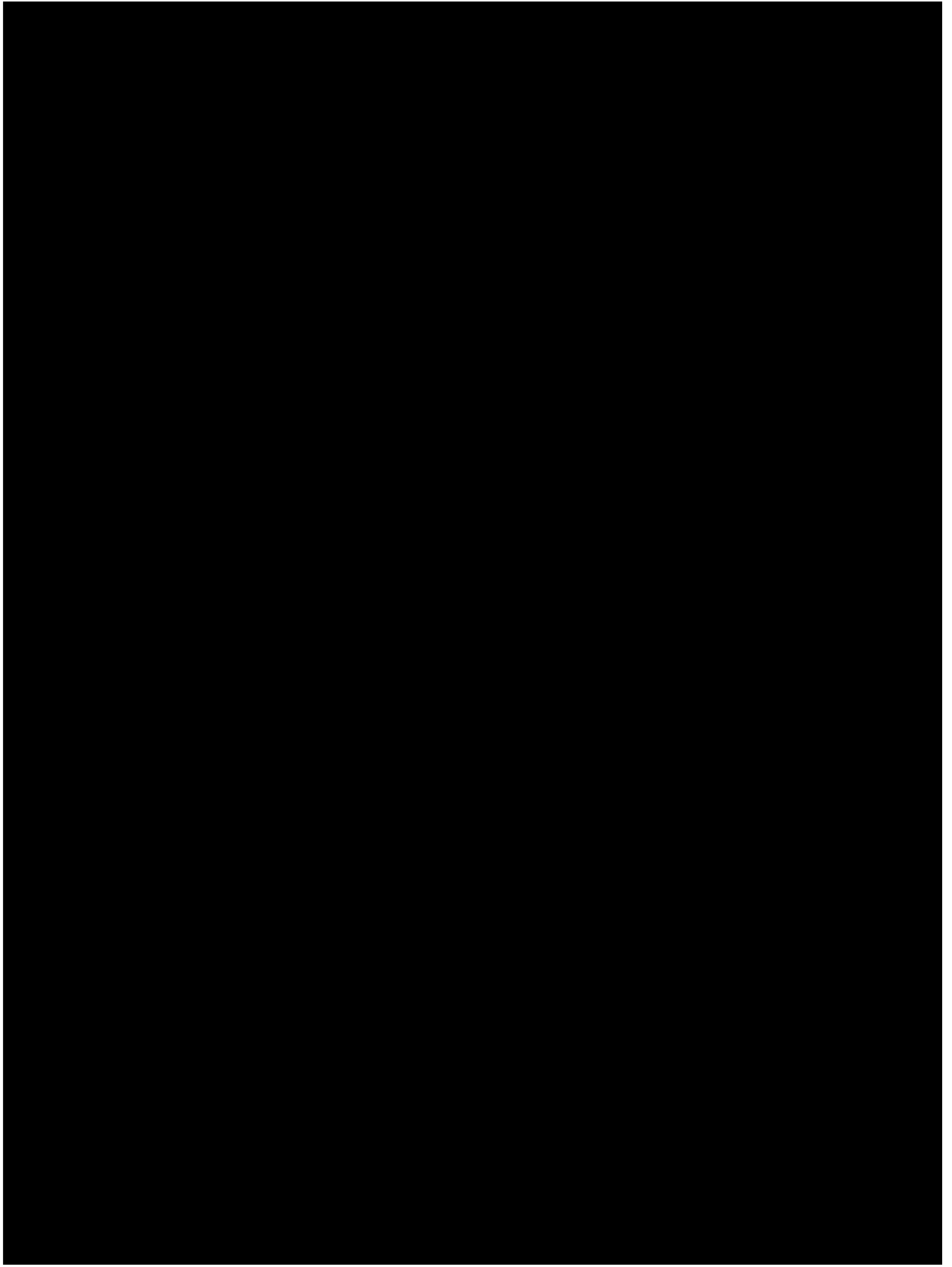


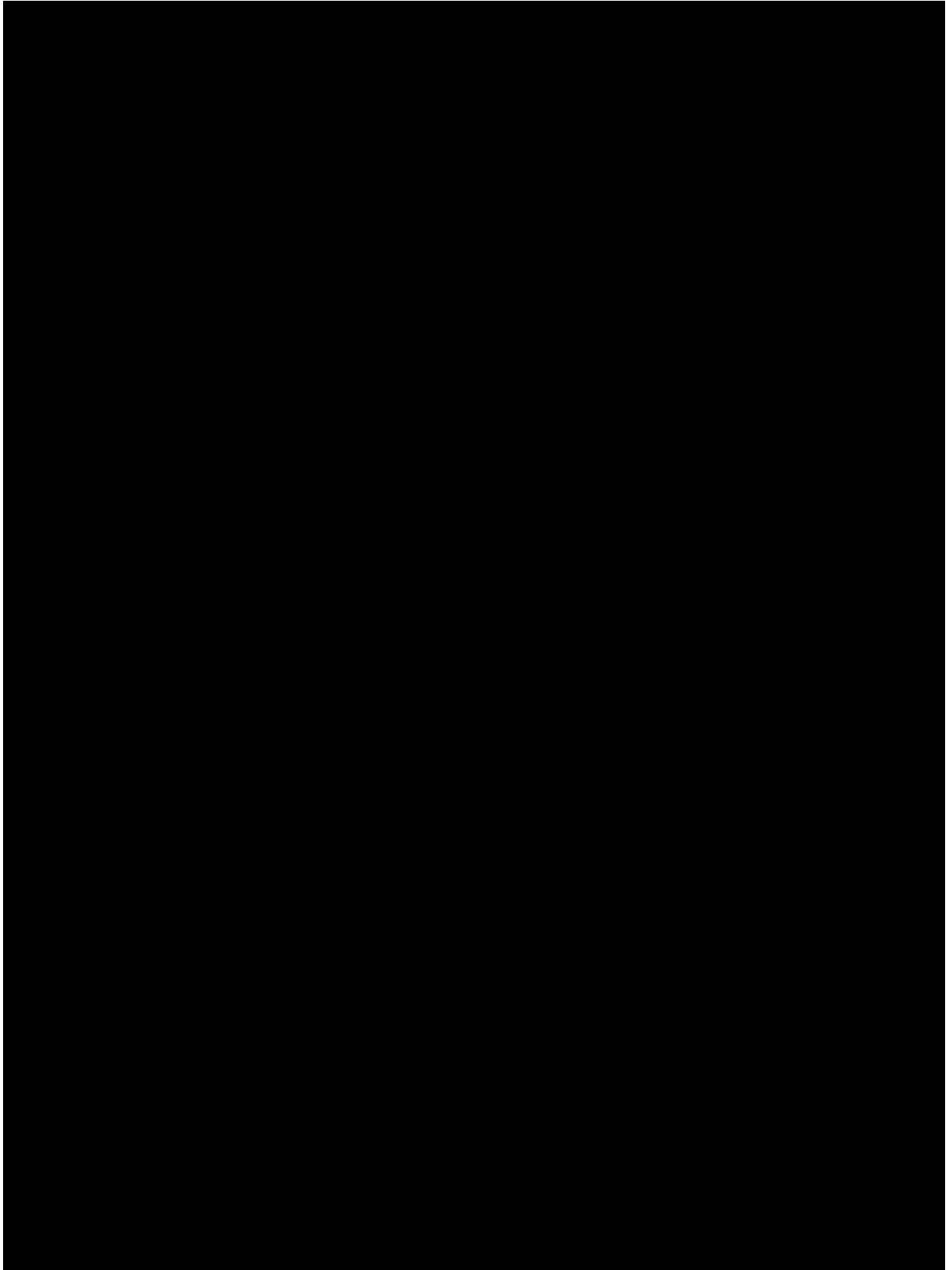


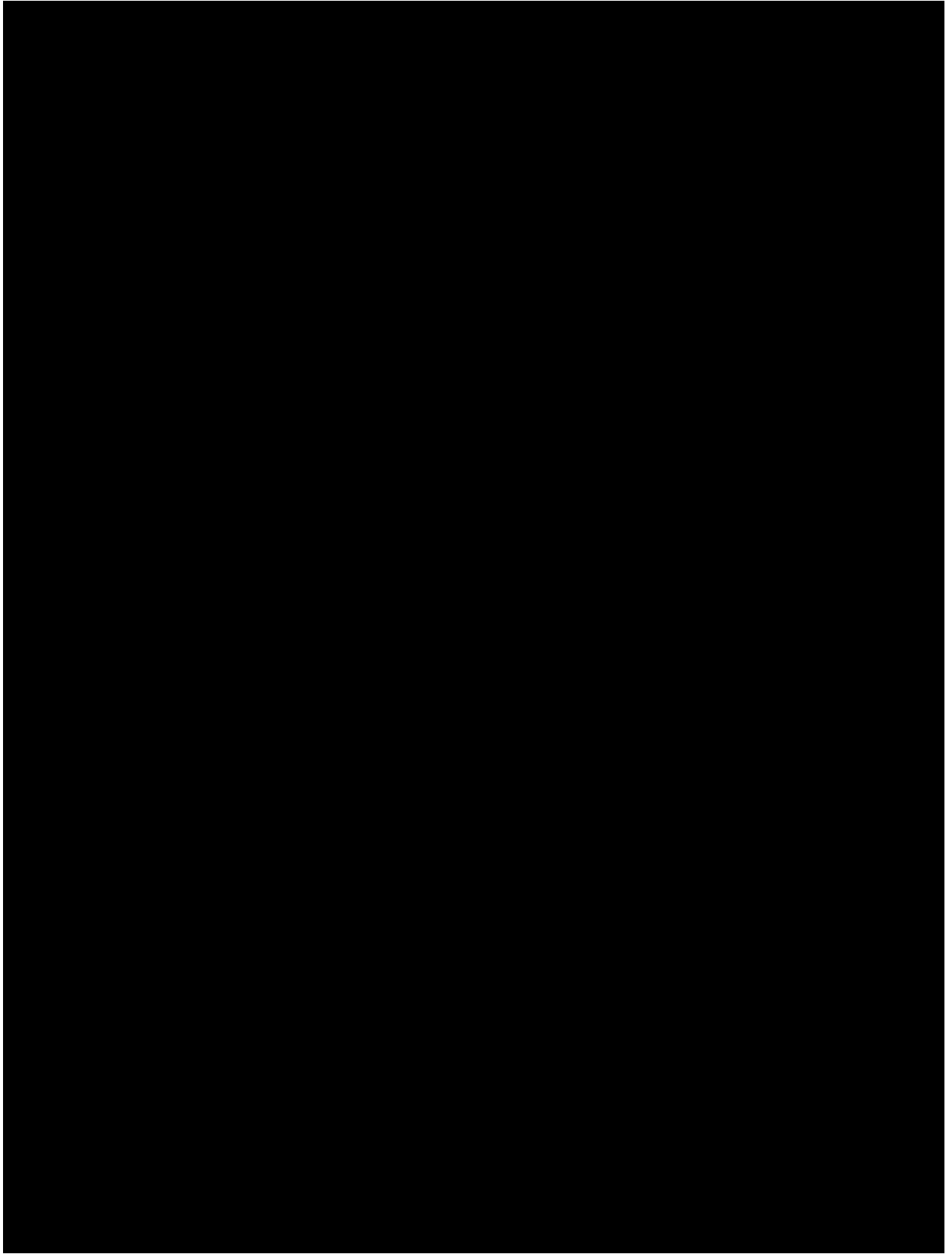


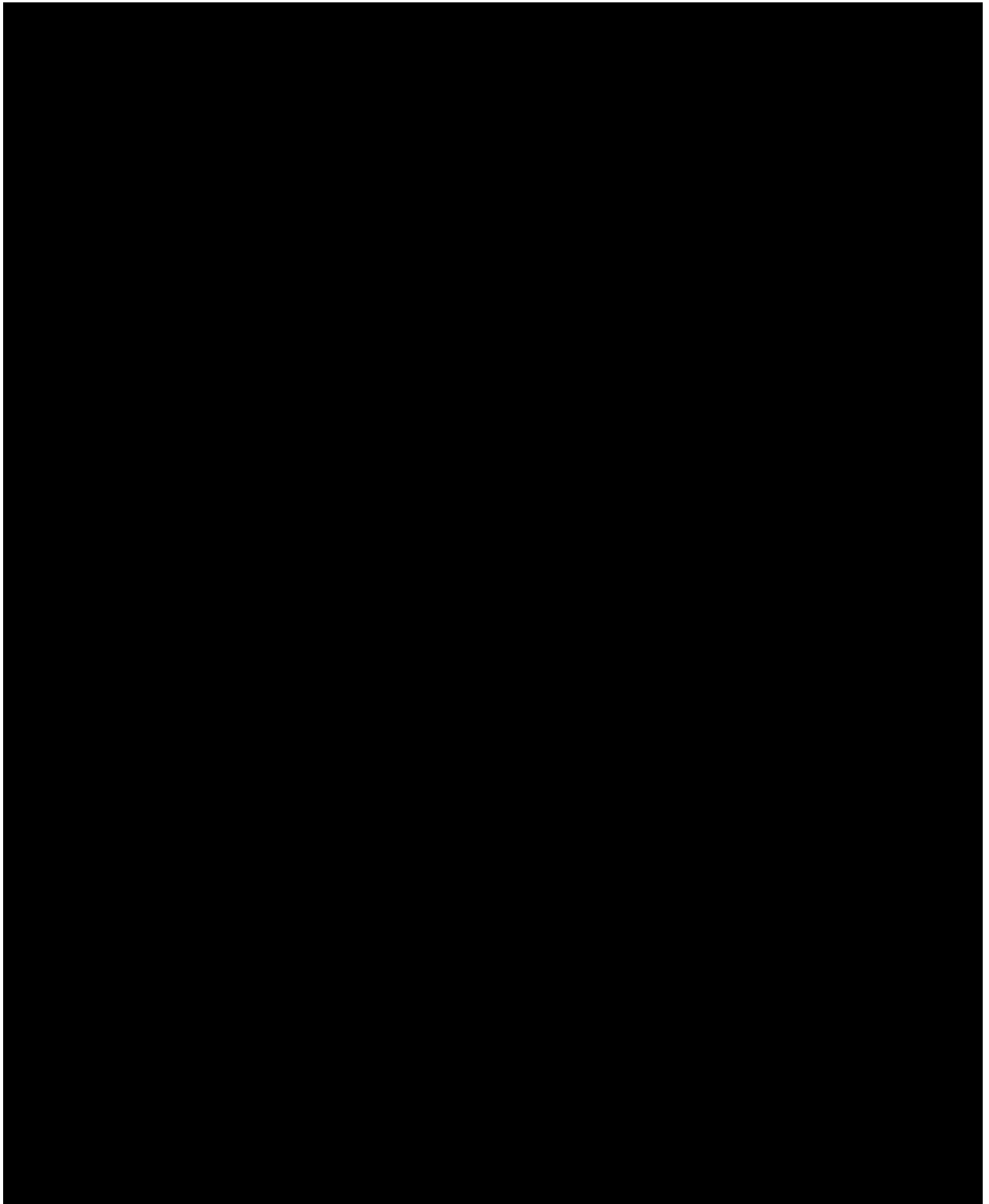












24 Q Can you turn to the next page.

25 Question nine reads: "Will the

1 Allaham - ATTORNEYS' EYES ONLY
2 activities on behalf of the above foreign
3 principal" -- that's the Emir and MBH --
4 "include political activities as defined
5 in Section one-zero or 1-0 of the act in
6 the footnote below."

7 Do you see that?

8 A Yes.

9 Q And there is no box checked for
10 whether political activities will be
11 engaged in on behalf of the foreign
12 principal.

13 Why is that?

14 A Because I never -- I never was
15 in contact with any official throughout
16 my -- throughout -- since I started work
17 with Qatar, I never interacted with any
18 officials -- American officials.

19 Q So then your testimony is that
20 the answer to this question should be no?

21 A Yes, we should do a "no" here.

22 Q Do you know why no was not
23 checked?

24 A I have to check with my lawyers.

25 Q And who are the lawyers that

1 Allaham - ATTORNEYS' EYES ONLY
2 filled out these forms on your behalf?

3 A I'm not sure because my lawyer
4 who was dealing with this was traveling
5 that day, was Craig Engle. So I don't
6 know who took and did it, but I will
7 definitely, please, raise it with him. We
8 need to check boxes. We have unchecked
9 boxes.

10 Q Was Alan Dershowitz involved in
11 the preparation of this FARA registration
12 form?

13 A No.

14 Q Was Ben Brafman involved in the
15 preparation and filing of this FARA
16 registration form?

17 A No.

18 Q Was Abbe Lowell involved in the
19 preparation and filing of this FARA
20 registration form?

21 A No.

22 Q Was Michael Bhargava involved in
23 the filing and preparation of this FARA
24 registration form?

25 A No.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Can you please turn to page
3 three of Exhibit 2.

4 MS. YUSUF: Which exhibit?

5 Q Same exhibit, Exhibit 2.

6 A More boxes?

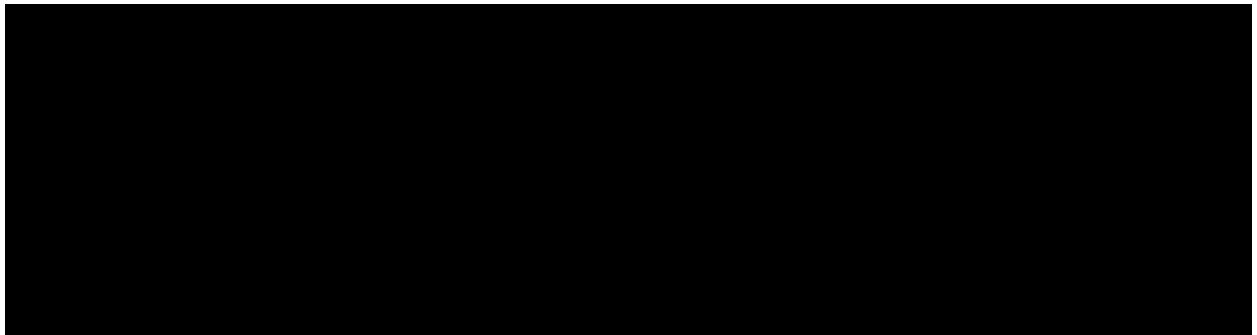
7 Q More questions.

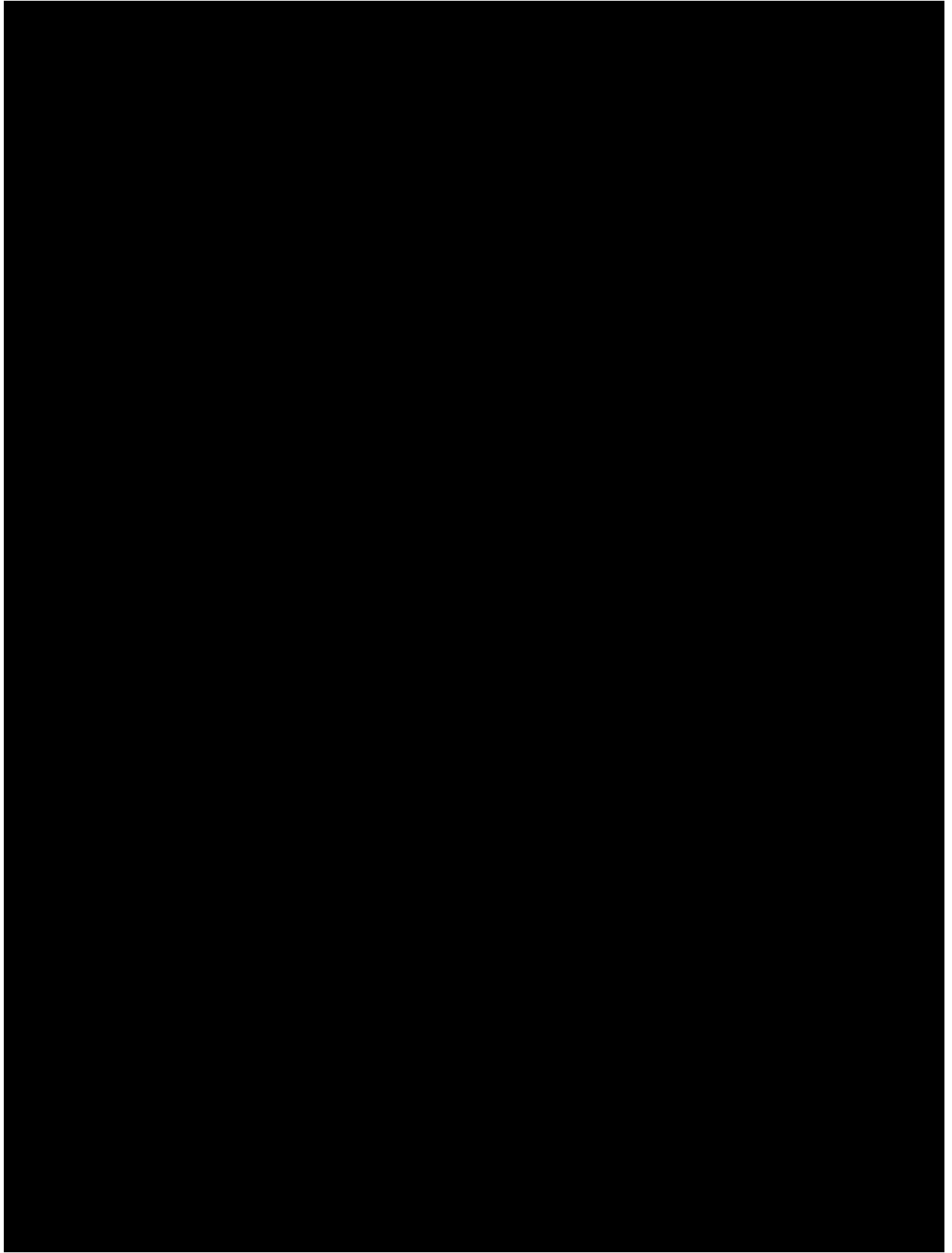
8 So question eight. You write in
9 response to question eight, "The
10 registrant began working to promote the
11 2022 World Cup in Qatar and then expanded
12 its activities to include fostering better
13 relations within the Gulf region."

14 Does that mean --

15 MS. YUSUF: Counsel skipped a
16 word, so I just want the record to
17 reflect it says "better international
18 relations."

19 Q "Better international relations
20 within the Gulf region."







5 Q What is "non-FARA activity," as
6 you used the term there?

7 A I think my lawyers decided to
8 put it, so I'm not sure.

9 Q What is your understanding of
10 what that term means?

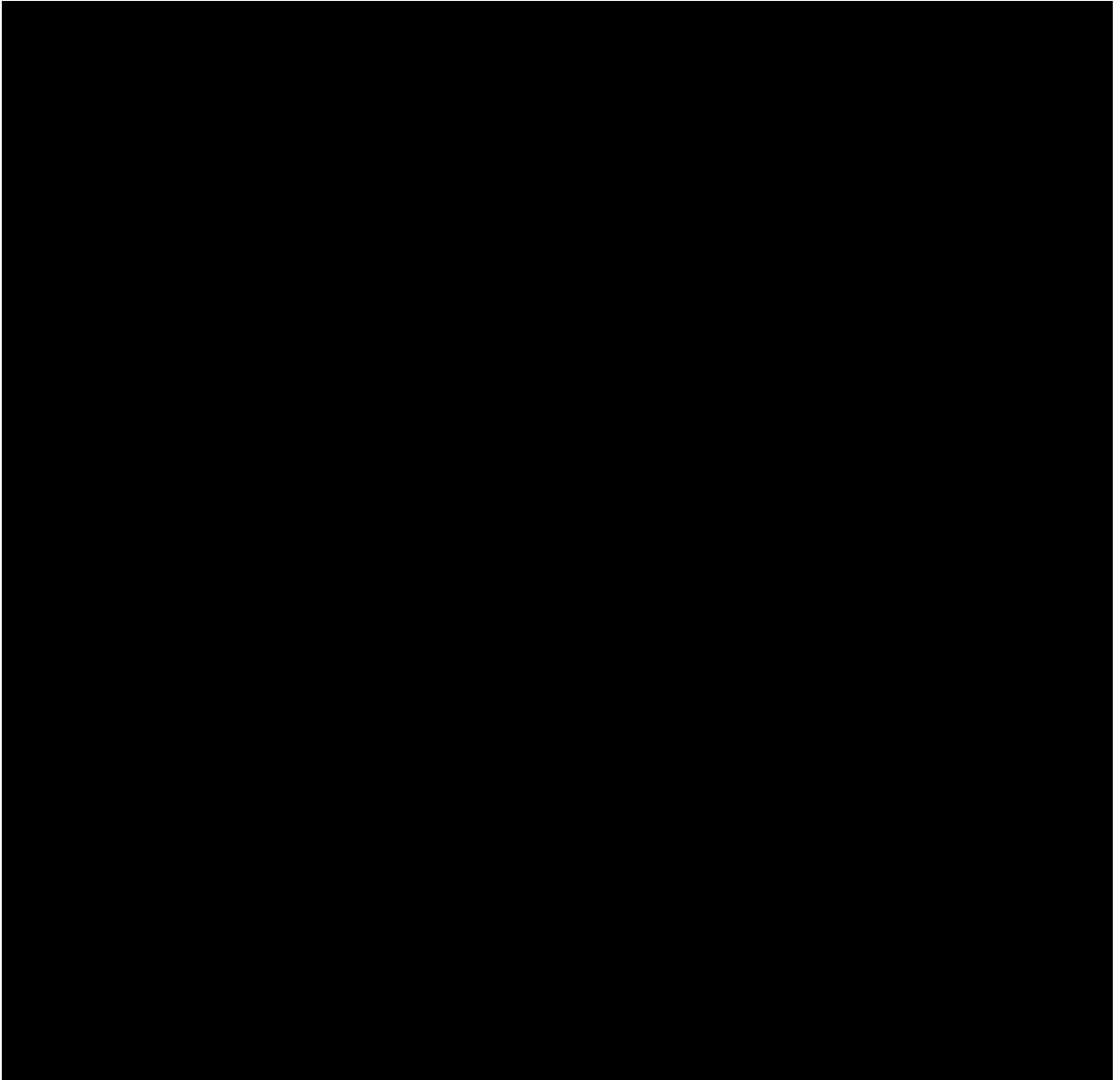
11 A I have no idea about FARA. To
12 me, FARA was you have to register if you
13 have -- if you're in touch with
14 politicians. In my case, I was never in
15 touch with politicians, but my lawyers
16 chose to do it not to violate any law. I
17 was never at any time, at any time given,
18 since I started, shook a politician hand
19 or was on the same sidewalk of a
20 politician.

21 Q And then it goes on to say in
22 that same sentence, "And working with
23 other consultants to Qatar."

24 Do you see that?

25 A Yes.

1 Allaham - ATTORNEYS' EYES ONLY



20 Q But it is fair to say you worked
21 with him?

22 A I mean, our interests align. So
23 we both --

24 Q But you exchanged WhatsApp
25 messages with him?

1 Allaham - ATTORNEYS' EYES ONLY

2 A Yes.

3 Q You spoke to him on the phone,
4 exchanged e-mails and working drafts of
5 documents with him, correct?

6 A Yeah, make, you know --

7 MR. GIMBEL: Objection to form.

8 Q You can answer.

9 A I mean, yes.

10 Q Why did you have an e-mail
11 address at Stonington.com?

12 A Because it was encrypted and I
13 don't have an encrypted account. So Nick
14 volunteered for me to have one. I rarely
15 use it.

16 Q Were you ever a subagent of
17 Stonington?

18 A No.

19 MR. GIMBEL: Objection. Calls
20 for a legal conclusion.

21 Q Okay.

22 Now, if you go to the bottom of
23 that page, there is a section called
24 financial information.

25 Do you see that?

1 Allaham - ATTORNEYS' EYES ONLY

2 A Yes.

3 Q And this, again, describes the
4 incoming initial grant of 1.45 million
5 dollars.

6 Do you see that?

7 A Yes.

8 Q It was received in October of
9 2017.

10 A Yes.

11 Q Under purpose, it says, "Develop
12 plan to promote 2002 World Cup in Doha."

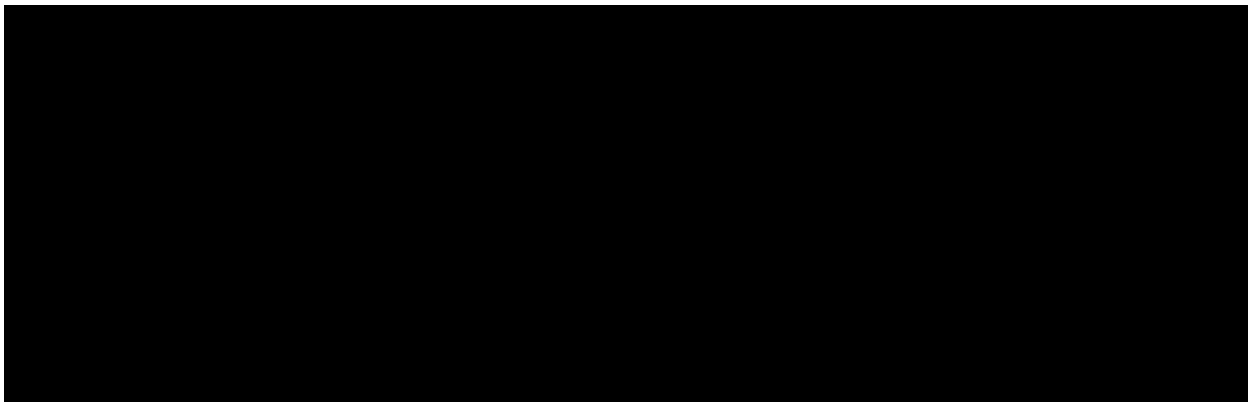
13 Do you have a copy of that plan?

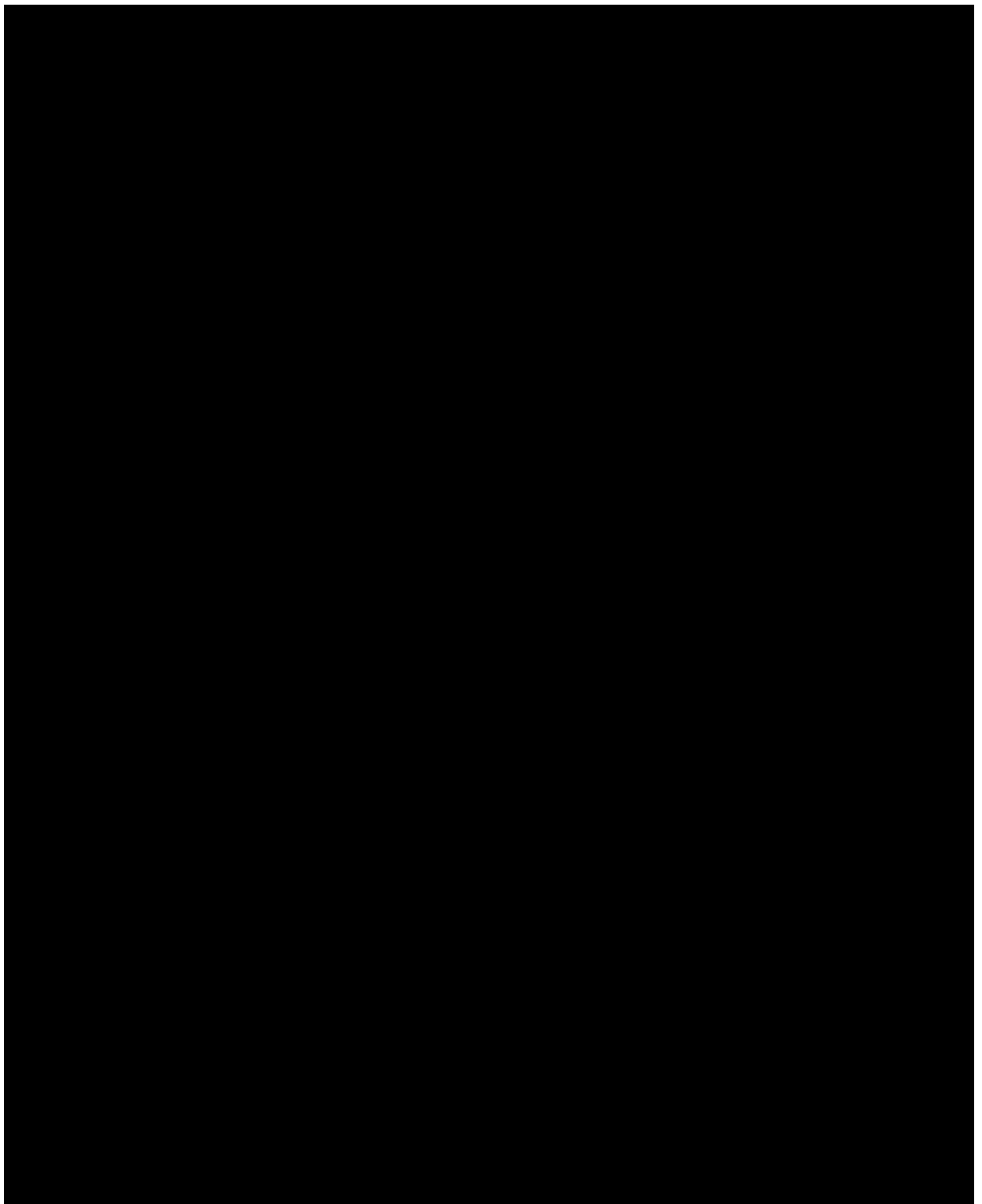
14 MS. YUSUF: I think you mean
15 2022.

16 Q Sorry. "Developed plan to
17 promote 2022 World Cup in Doha."

18 Do you see that?

19 A Yes.





24 Q The last sentence under purpose
25 says, "Work entailed making FARA and

1 Allaham - ATTORNEYS' EYES ONLY
2 non-FARA-related expenditures."

3 Do you see that?

4 A Yes.

5 Q What are non-FARA-related
6 expenditures?

7 A Again, my lawyers put that in.
8 I'm not sure what they consider FARA or
9 non-FARA. FARA, to me, my understanding
10 was dealing with politicians and lobbying
11 on the hill, which I never did.

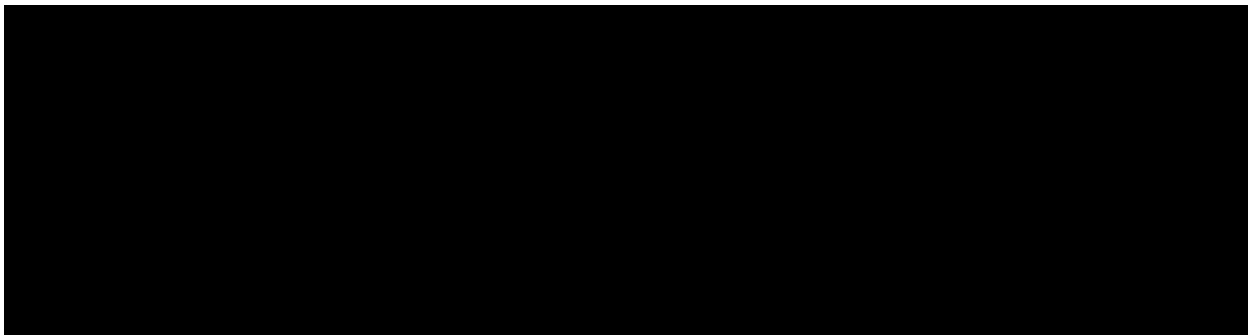
12 Q Before I leave this page, I want
13 to go back to question eight briefly,
14 where it says "working with other
15 consultants to Qatar," at the end.

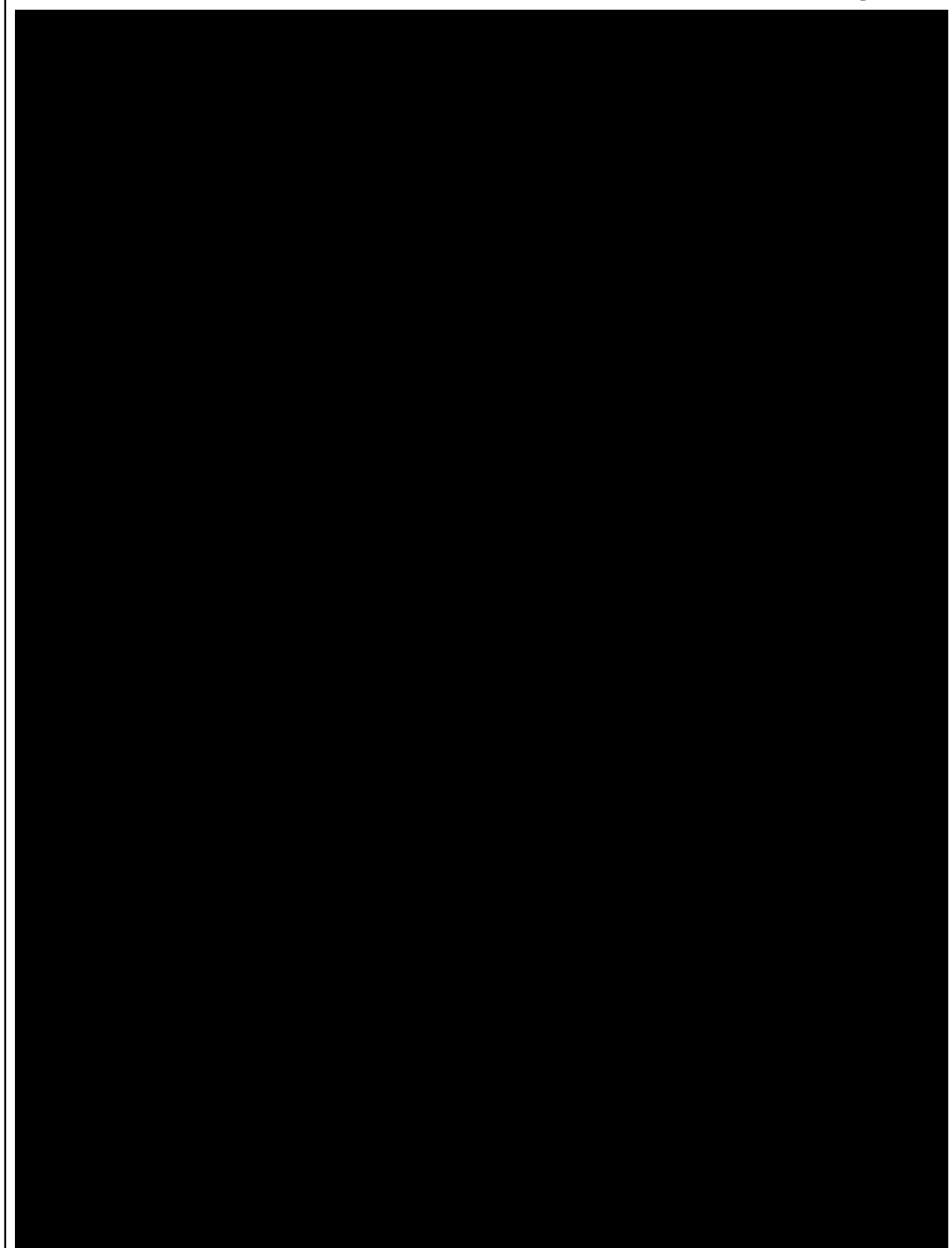
16 Do you see that?

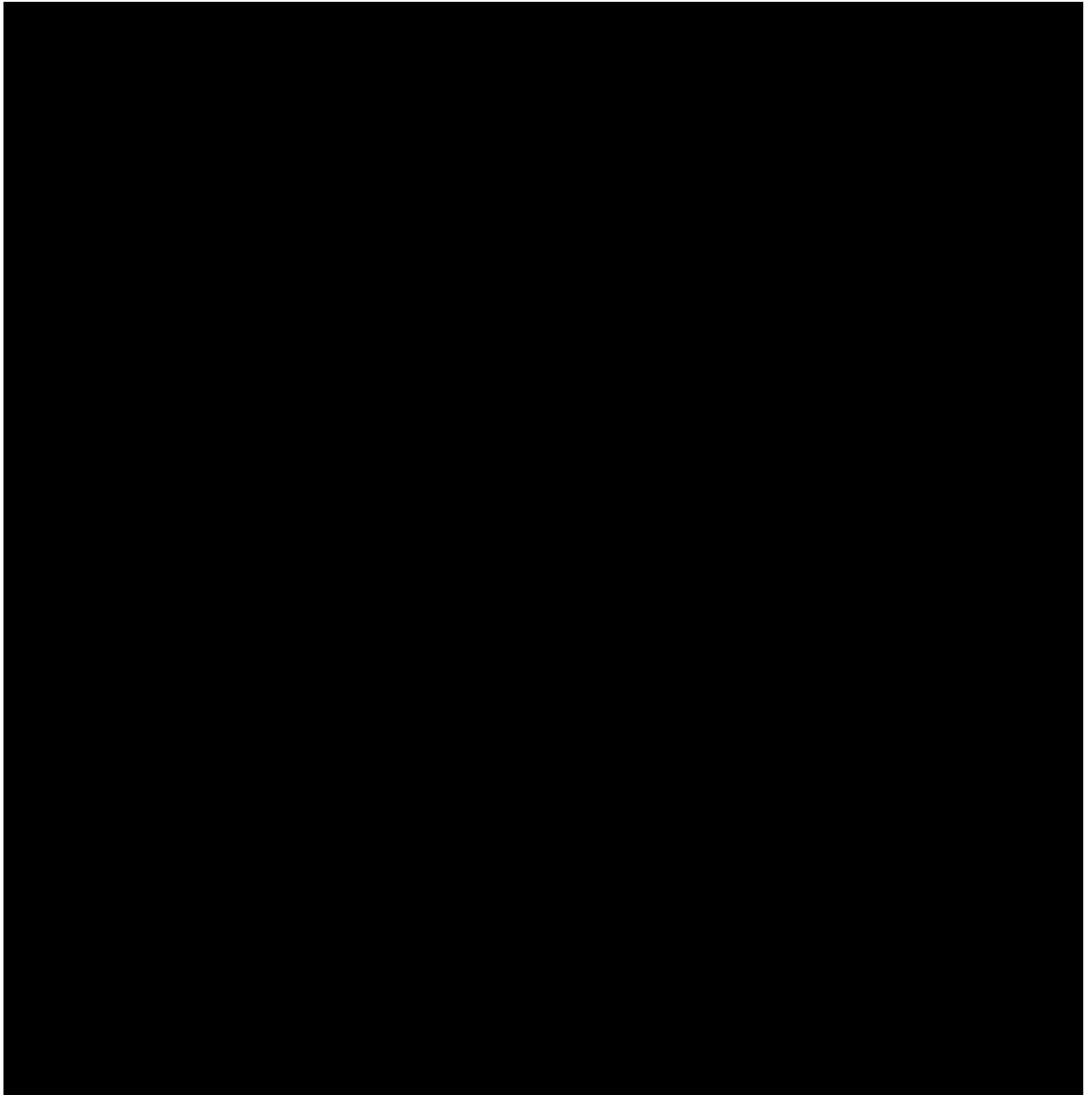
17 A No. Yes, on eight, yes.

18 Q And I apologize for coming back
19 to it.

20 A Yes.







20 A No.

21 Q Can you turn to page four of the
22 same exhibit, Exhibit 2.

23 At the top of the page, question
24 9B, Receipts, Things of Value reads,
25 "During the period beginning 60 days prior

1 Allaham - ATTORNEYS' EYES ONLY
2 to the date of your obligation to register
3 to the time of filing this statement, did
4 you receive from any foreign principal
5 named in item seven anything of value
6 other than money either as compensation,
7 for disbursement, or otherwise."

8 Do you see that?

9 A Yes.

10 Q You'll note that neither the
11 "yes" box nor the "no" box is checked on
12 the form that is filed.

13 Do you see that?

14 A Yes.

15 Q Do you know why neither box was
16 checked?

17 A No, I don't.

18 Q Do you know what the answer to
19 the question that 9B poses is?

20 A No.

21 Q Did you, Mr. Allaham, receive
22 from any foreign principal named in item
23 seven anything of value other than money?

24 A Where is item seven?

25 Q Item seven is the box that

1 Allaham - ATTORNEYS' EYES ONLY

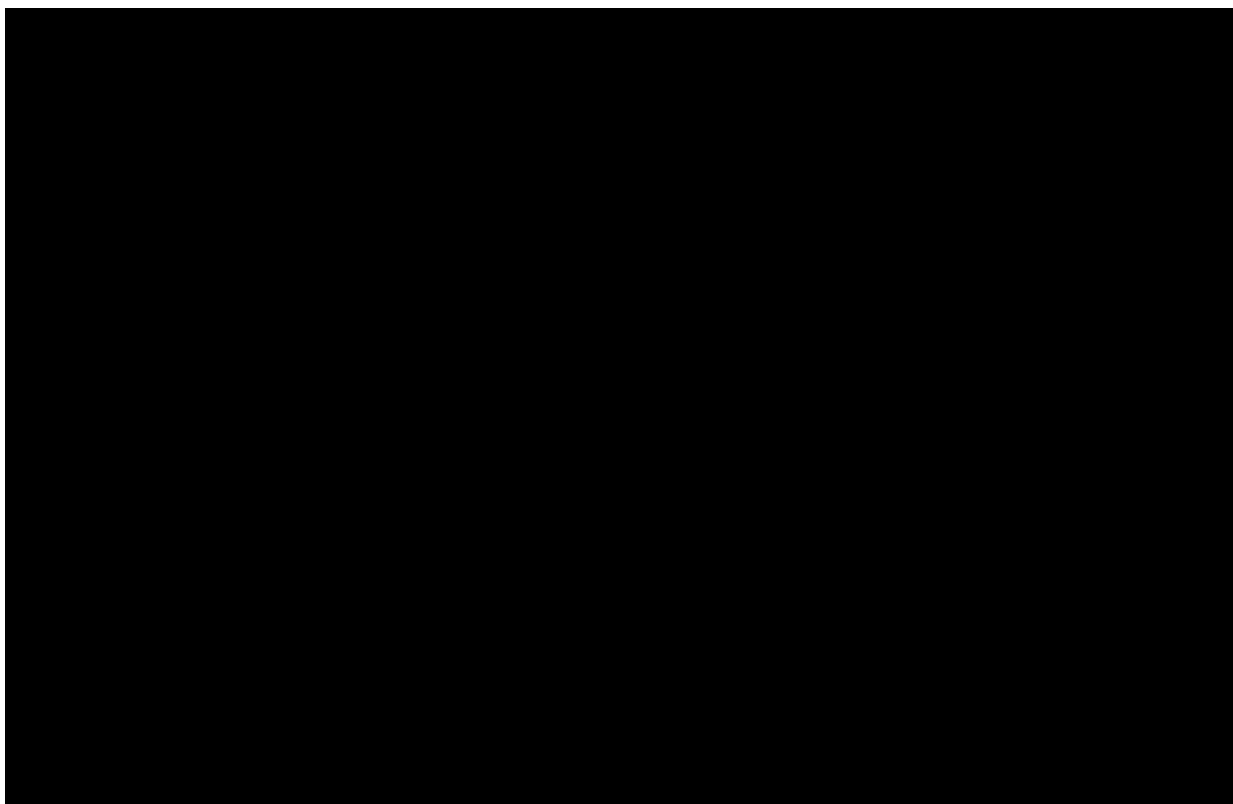
2 includes the Emir and MBH.

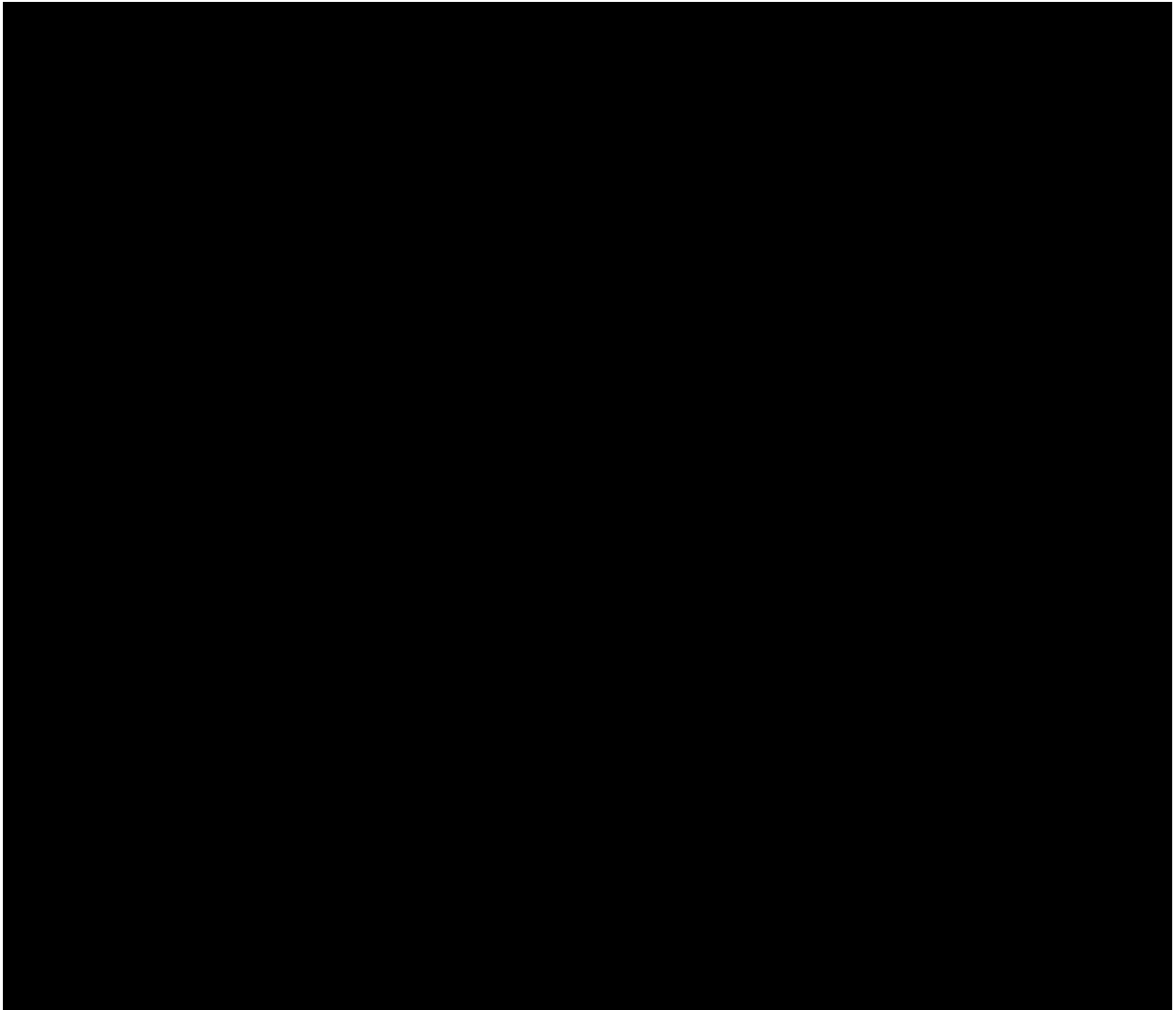
3 A No.

4 Q And the State of Qatar and the
5 Supreme Committee for Delivery & Legacy.

6 The question is asking you
7 whether you have received anything of
8 value from any of those persons or
9 entities other than money?

10 MS. YUSUF: That's not what the
11 question says. It says, "During the
12 period beginning 60 days prior to."
13 So the question does have a qualifier.





17 A The Sheraton, usually, I like,
18 because I get my points on SPG. I like
19 SPG points, usually gets me to Marriott
20 and SPG, and that's how we take our
21 vacation.

22 Q Question 10A reads, "During the
23 period 60 days" -- sorry. "During the
24 period beginning 60 days prior to the date
25 of your obligation to register to the time

1 Allaham - ATTORNEYS' EYES ONLY
2 of filing the statement, did you spend or
3 disburse any money in furtherance of or in
4 connection with your activities on behalf
5 of any foreign principal named in item
6 seven."

7 Do you see that?

8 A Yes.

9 Q And the "no" box is checked, but
10 it does say "see attachment" at the
11 bottom.

12 Do you see that?

13 A Yes.

14 Q So let's go to the attachment.

15 A Attachment.

16 Q If you flip ahead about four
17 pages, there is a sheet of paper that
18 says, "Attachment, question 10A."

19 A Yes.

20 Q Do you see that?

21 A Yes.

22 Q This is a list of disbursement
23 of monies.

24 A Yes.

25 Q Now, is this a complete list of

1 Allaham - ATTORNEYS' EYES ONLY

2 the money that was disbursed by you --

3 A Yes.

4 Q -- in furtherance of the work
5 that you performed by the State of Qatar?

6 A Yes.

7 Q Did you disburse money to Alan
8 Dershowitz in connection with the work you
9 performed by the State of Qatar?

10 A Again, it is client -- and he
11 does not only work with me on Qatar, we
12 work on many different subject and consult
13 on many different countries in the regions
14 of the Arab regions or Middle East or
15 Africa.

16 Q What are some of the other
17 countries that are the subject of your
18 work with Alan Dershowitz?

19 A Nothing is sealed yet. I'm open
20 for business. If you have any clients,
21 you're welcome to send them over.

22 Q You mentioned Africa.

23 Do you work with Alan Dershowitz
24 on countries relating to or in Africa?

25 A I mean, Morocco, I assume, is in

1 Allaham - ATTORNEYS' EYES ONLY
2 Africa.

3 Q Do you work with Professor
4 Dershowitz on Morocco issues?

5 A No, I did not end up getting the
6 job, but it was -- I was trying to get the
7 account. I did not get it.

8 Q Were you trying to get the
9 account from Mr. Benomar relating to
10 Morocco?

11 A Not from him, from the officials
12 of Morocco.

13 Q Was Mr. Benomar involved in that
14 work that you were doing to try to get
15 work from Morocco?

16 A I mean, I don't know what
17 "involved" means. I met with the foreign
18 minister and apparently he was not
19 interested, so --

20 Q To your knowledge, did Morocco
21 hire Mr. Benomar to do work for it?

22 A I'm not sure. I don't know.
23 You have to ask him that. I do not know.

24 Q Did Morocco hire Professor
25 Dershowitz to do work for it, to your

1 Allaham - ATTORNEYS' EYES ONLY

2 knowledge?

3 A No, it was done through me,
4 because of me, I arranged it. So it was
5 not through Jamal, it was through me. And
6 I recall the king was not there, so it
7 didn't really take effect.


8 Q And how much money did Professor
9 Dershowitz get paid for the work for the
10 State of Morocco?

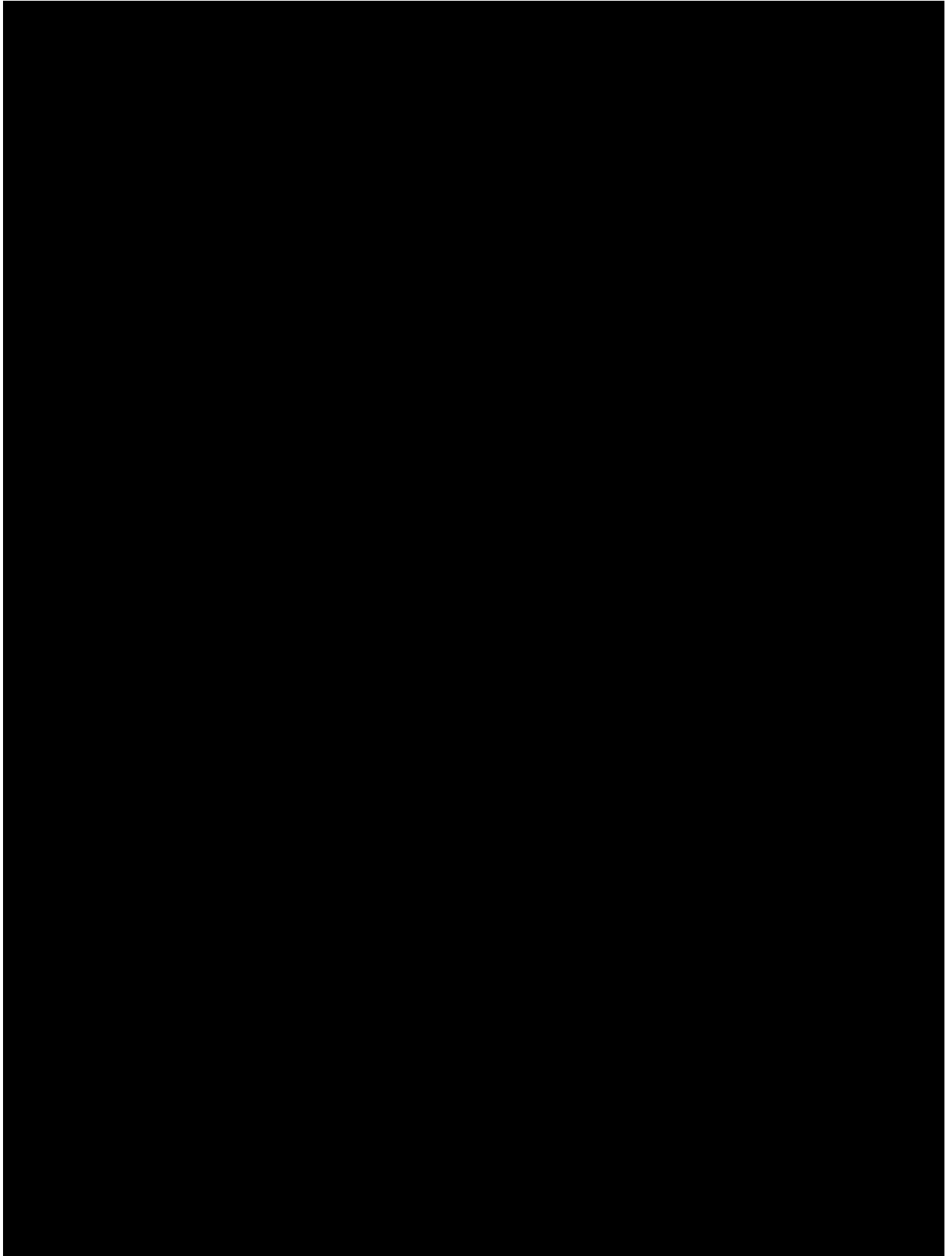
11 MS. YUSUF: Objection.

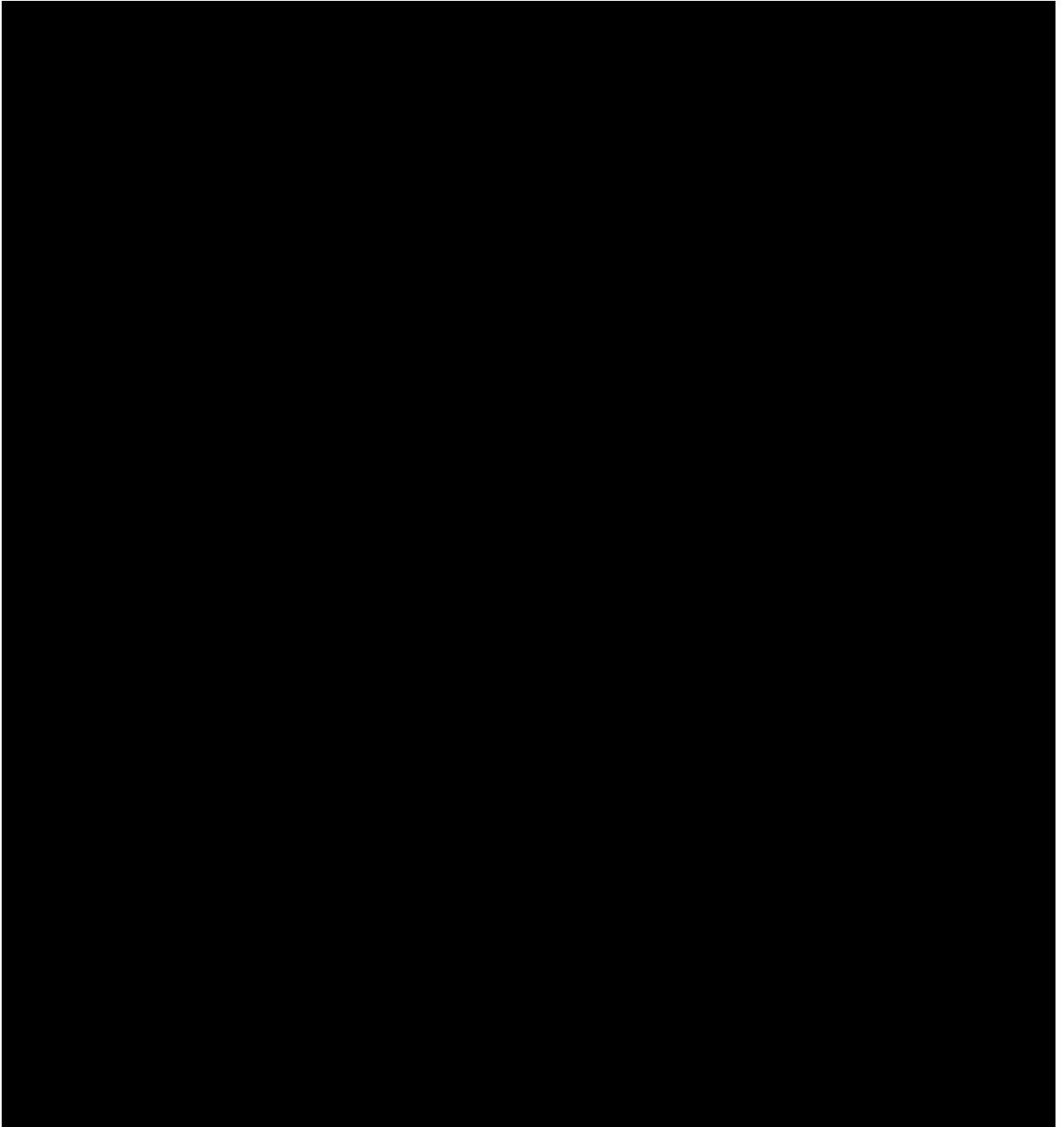
12 A Again, it's not -- his contract
13 with me is wide open. If I have to work
14 with Japan, it will be with Japan. It's
15 not just -- whatever I do, he works with
16 me as a consultant. So --

17 Q But that includes work that you
18 did for the State of Qatar, among many
19 other countries?

20 A Not many other countries yet,
21 but Israel is one of them, for example.







21 Q So turning to this exhibit.

22 MS. YUSUF: Are you referring to
23 the attachment, Counsel?

24 Q Yes, thank you. Attachment to
25 question 10A.

1 Allaham - ATTORNEYS' EYES ONLY

2 What is Our Soldiers Speak?

3 A It is an Israeli organization
4 that helps soldiers and their families.

5 Q And how was it -- what was the
6 purpose of the \$100,000 grant to it in
7 connection with the work that you were
8 doing for the State of Qatar?

9 A It was my choice. And I support
10 the IDF and Israeli soldiers, and it is
11 something that is very dear to me.

12 Q Who is the leadership of Our
13 Soldiers Speak?

14 Who are the people you deal with
15 there?

16 A I don't deal with -- not
17 specific. Same thing with IDF
18 organization or APEC or -- it is a general
19 organization.

20 Q But who did you call up on or
21 before October 30th to say, "I want to
22 contribute \$100,000 to your organization"?

23 A It is one of the honoraries.

24 Q What is the name of the
25 honorary?

1 Allaham - ATTORNEYS' EYES ONLY

2 A Joe Cayre.

3 Q Can you spell that?

4 A Joe, J-O-E; Cayre, C-A-Y-R-E.

5 Q And is he American or Israeli?

6 A American. And he was being
7 honored.

8 Q And where was he being honored?

9 A At that dinner event.

10 Q Where was the dinner held?

11 A At a downtown banquet hall or --
12 I forgot. It will come to me.

13 Q And so you basically bought a
14 table or something to that effect, at this
15 dinner?

16 A Yes.

17 Q Honoring Mr. Cayre?

18 A Mostly the organization because
19 I like the organization.

20 Q Did the organization have
21 anything further to do with your work for
22 Qatar?

23 A No.

24 Q To your knowledge, did any
25 Qatari nationals attend that dinner?

1 Allaham - ATTORNEYS' EYES ONLY

2 A No.

3 Q When you made the contribution
4 to Our Soldiers Speak, did you tell Our
5 Soldiers Speak that the money came from
6 Qatar?

7 A They didn't ask me, so --

8 Q Did you tell them?

9 A I didn't -- I was not asked.

10 Q And you didn't volunteer the
11 information?

12 A I was not asked.

13 Q So what's the purpose of giving,
14 in your mind, \$100,000 to an organization
15 to promote goodwill for Qatar without the
16 recipients knowing that the money came
17 from Qatar?

18 A I think because it is dear to
19 me, and I know about the capture of
20 soldiers that are held by Hamas, and I met
21 with many people involved, that they want

22

23

24

25 non-FARA, if you want. So we're trying to

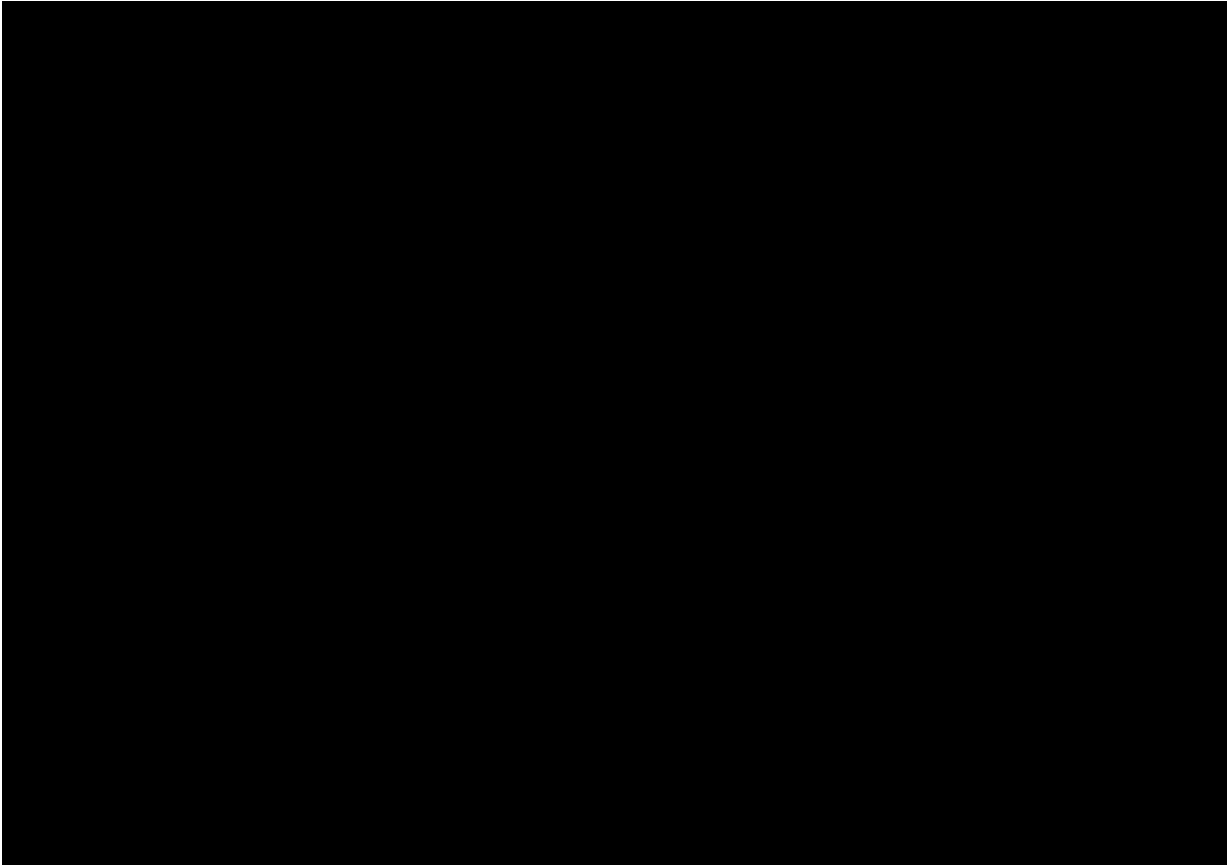
1 Allaham - ATTORNEYS' EYES ONLY
2 recapture the alive bodies Hamas was
3 holding. And I wanted the Qataris to know
4 that it is very dear to me and it is
5 something that I support, that we want to
6 get those bodies back. The parents and
7 many people came who I met with, that was
8 the main topic, even the Jewish leaders
9 topic was probably, I would say, 99
10 percent of every person that came in, that
11 was the top of the list to ask, for
12 captured bodies, for the parents, to be
13 returned.

14 So there was nothing better for
15 me to send a message to my bosses, that we
16 want this to be done, and it is something
17 that I asked every day to get it done.

18 Q And I certainly agree that it is
19 an important goal. But I'm having a hard
20 time understanding how giving \$100,000 of
21 Qatar's money to Our Soldiers Speak
22 furthers that goal.

23 A I have a hard time with a client
24 paying 1.6 to a Playboy model, so I try to
25 spend my 100,000 on an organization rather

1 Allaham - ATTORNEYS' EYES ONLY
2 than a Playmate. So I have a hard time
3 with that, so --



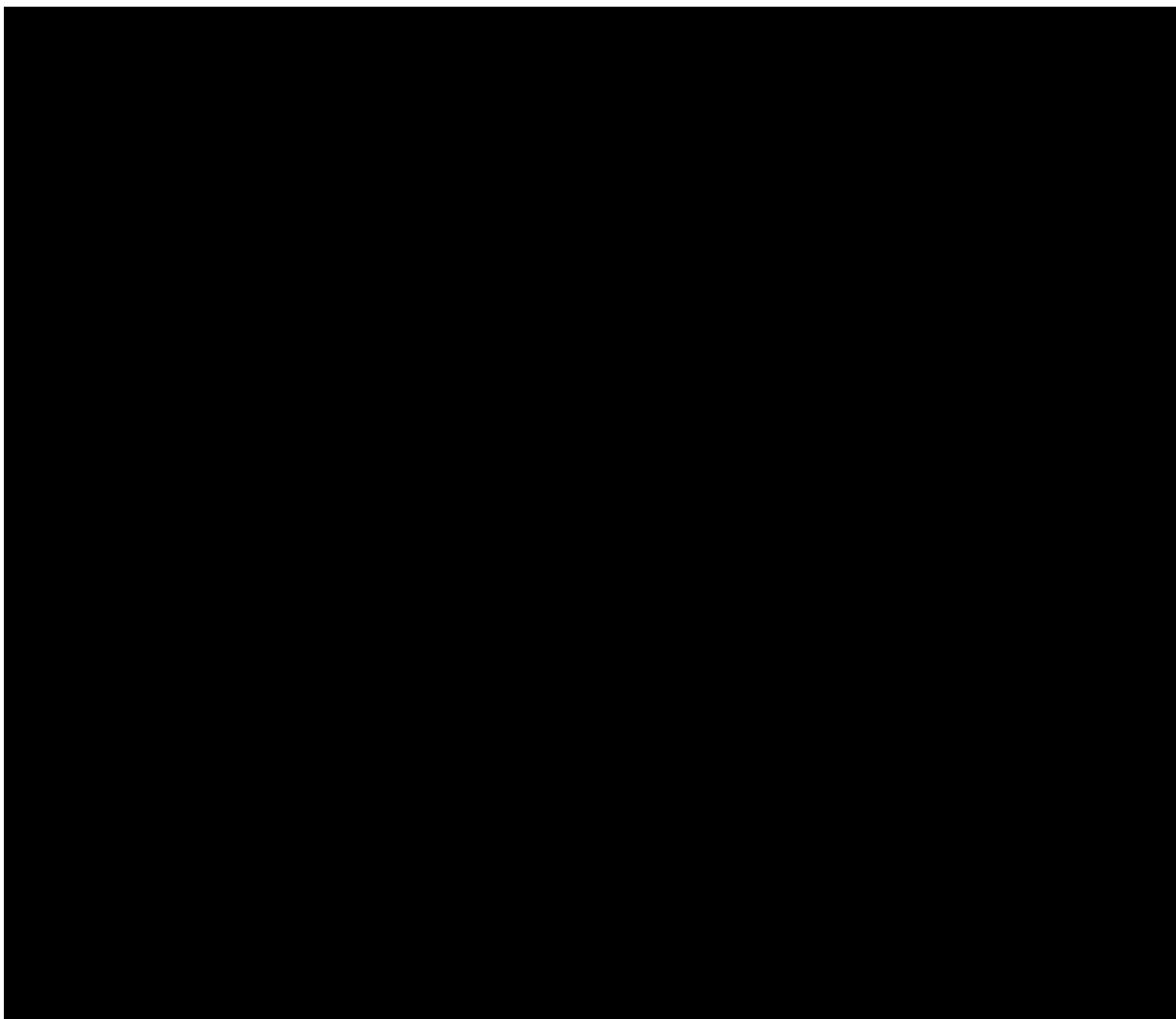
17 Q And how does this goodwill
18 contribution further that goal?

19 A Because me -- my point, giving
20 this money to an organization, is that the
21 soldiers -- and coming from me, which the
22 Qataris knew, that it is a bold statement
23 that I will always support the IDF and the
24 soldiers, and we want those bodies back
25 because I arranged many meetings with the

1 Allaham - ATTORNEYS' EYES ONLY
2 ambassador of Gaza for the Qatari with the
3 general of the Israel IDF. We did a lot,
4 and I hope those bodies will be returned.
5 So was just a statement and support for
6 other soldiers.

7 Q Did you discuss the return of





17 Q And the next contribution,
18 November 2, 2017, was to Zionist
19 Organization of America, \$50,000.

20 What was that contribution for?

21 A For a table for that dinner.

22 Q Is that Morton Klein's
23 organization?

24 A Yes.

25 Q Did you attend that dinner?

1 Allaham - ATTORNEYS' EYES ONLY

2 A No.

3 Q Did Mr. al-Rumaihi attend that
4 dinner?

5 A Yes.

6 Q And he attended that dinner at
7 your invitation?

8 A Yes.

9 Q Why did Mr. al-Rumaihi want to
10 attend the Zionist Organization of America
11 dinner?

12 MR. GIMBEL: Objection. Calls
13 for speculation.

14 Q Did you discuss -- you can
15 answer that question.

16 A I don't know that I invited him.
17 I was out of town when he -- I did not
18 have a full table, and he said yes, he
19 would come.

20 Q Why did you invite him to the
21 Zionist Organization of America dinner?

22 A I just did not have enough
23 people, bodies to fill my table.

24 Q Does Mr. Rumaihi live in the
25 United States to your knowledge?

1 Allaham - ATTORNEYS' EYES ONLY

2 A I'm not sure. I don't know. He
3 lives between Doha and the United States.
4 I don't know.

5 Q At the time you invited him to
6 the ZOA dinner, he was in the United
7 States?

8 A That dinner, I assume, was in
9 the United States not Doha, if I'm not
10 mistaken.

11 Q Do you know if he has a
12 residence in the United States?

13 A I do not know. A residence,
14 meaning a home?

15 Q Yes.

16 A From what I read, in LA, but
17 nothing that I -- you know, the Ahmed is
18 an interesting figure so I wasn't --

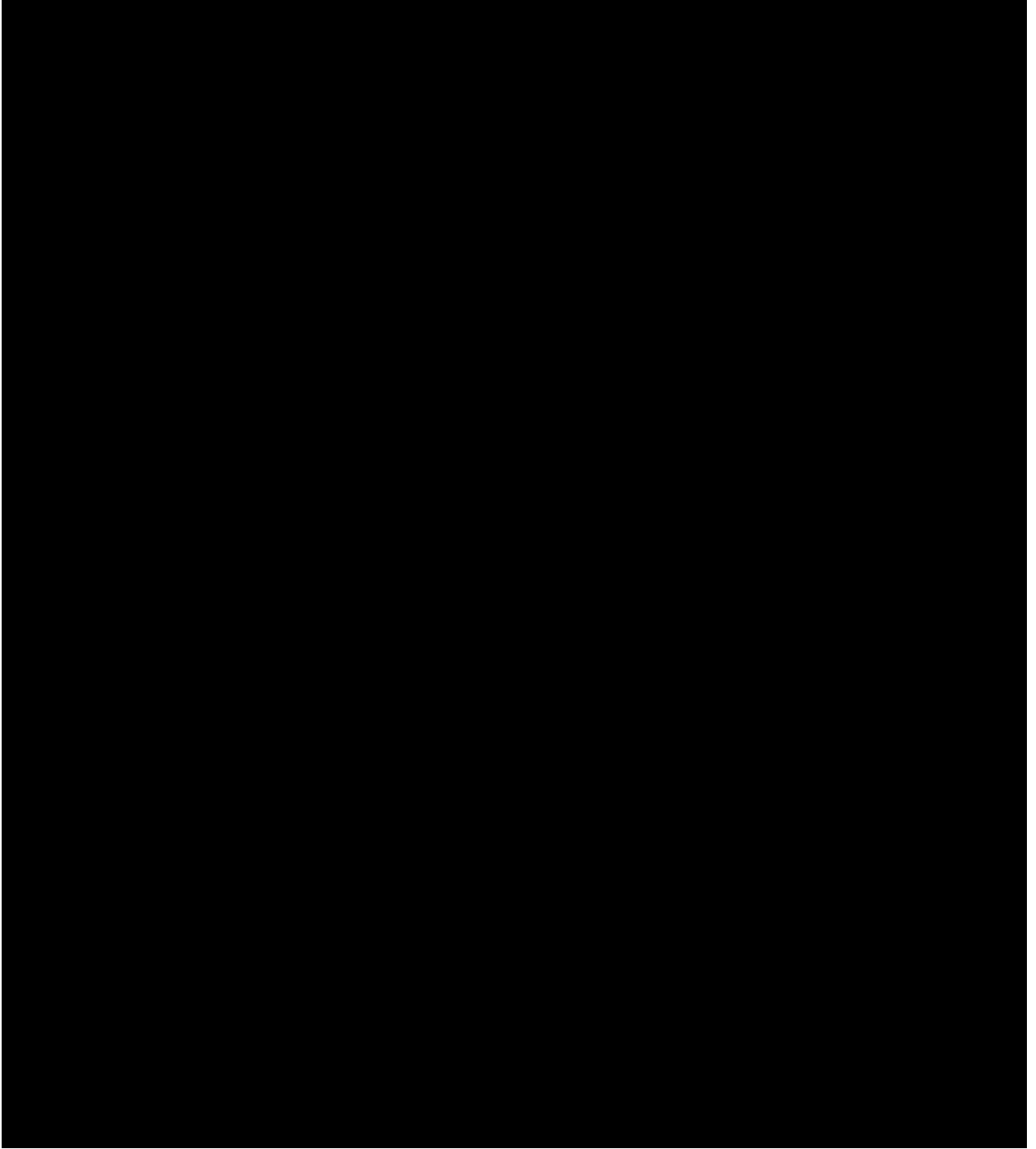
19 Q In what way is he an interesting
20 figure?

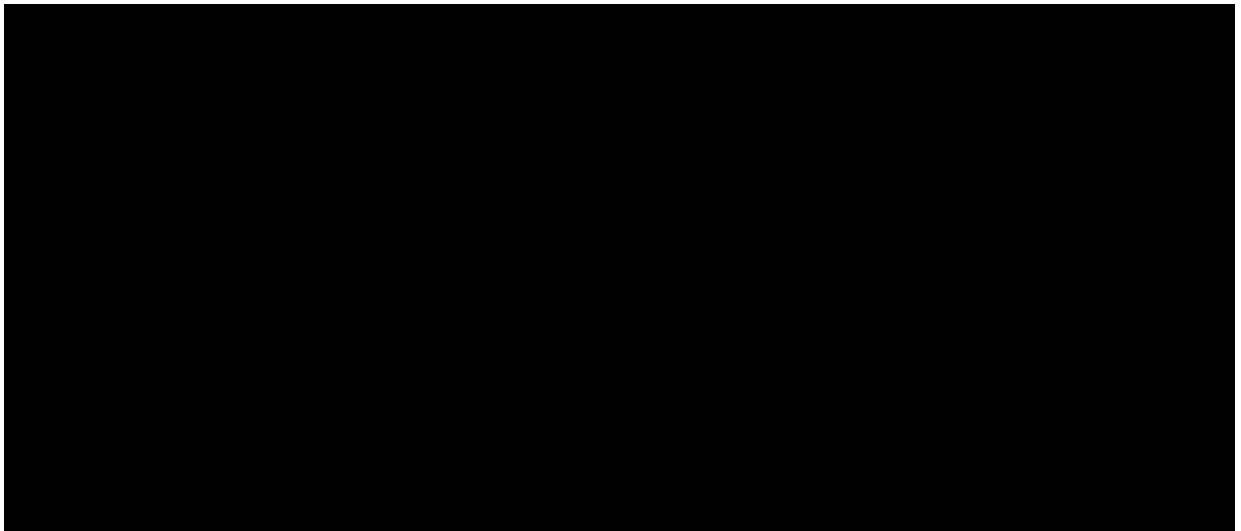
21 A He is just an interesting figure
22 so I never -- he is there, he is here, he
23 is there. So I don't know. I don't know
24 what his residence, if he owns, rents, I
25 have no clue.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Do you know if he is in the
3 United States currently?

4 A I do not know.





9 Q Did you speak to Mr. Geragos
10 during this time period?

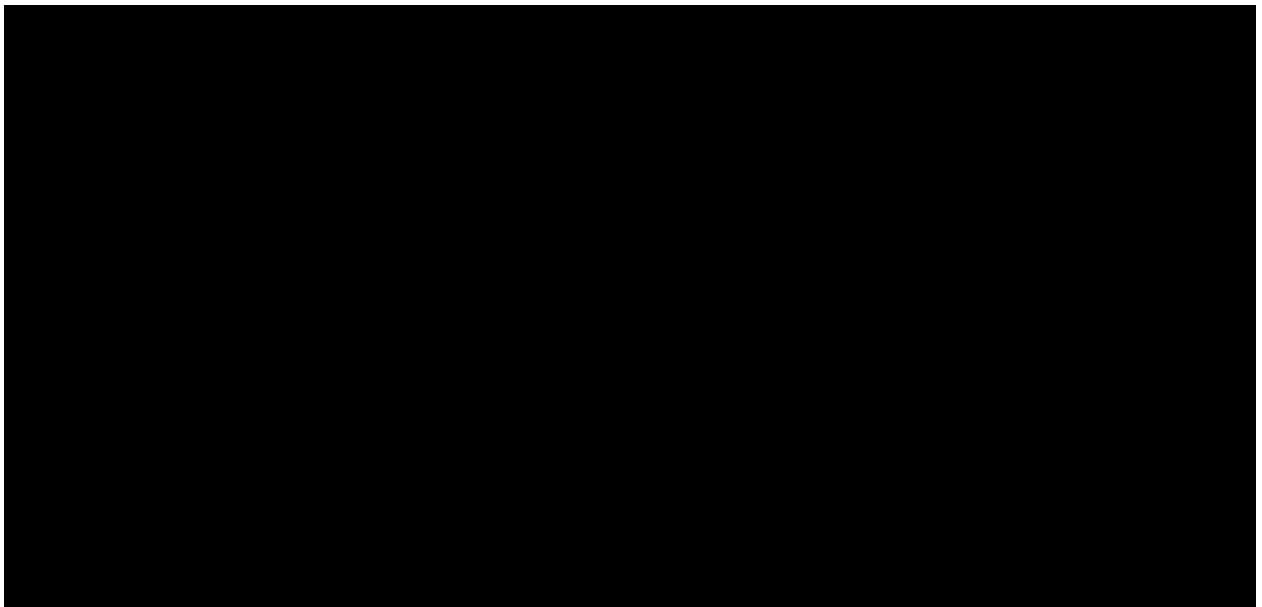
11 A No -- is he a lawyer?

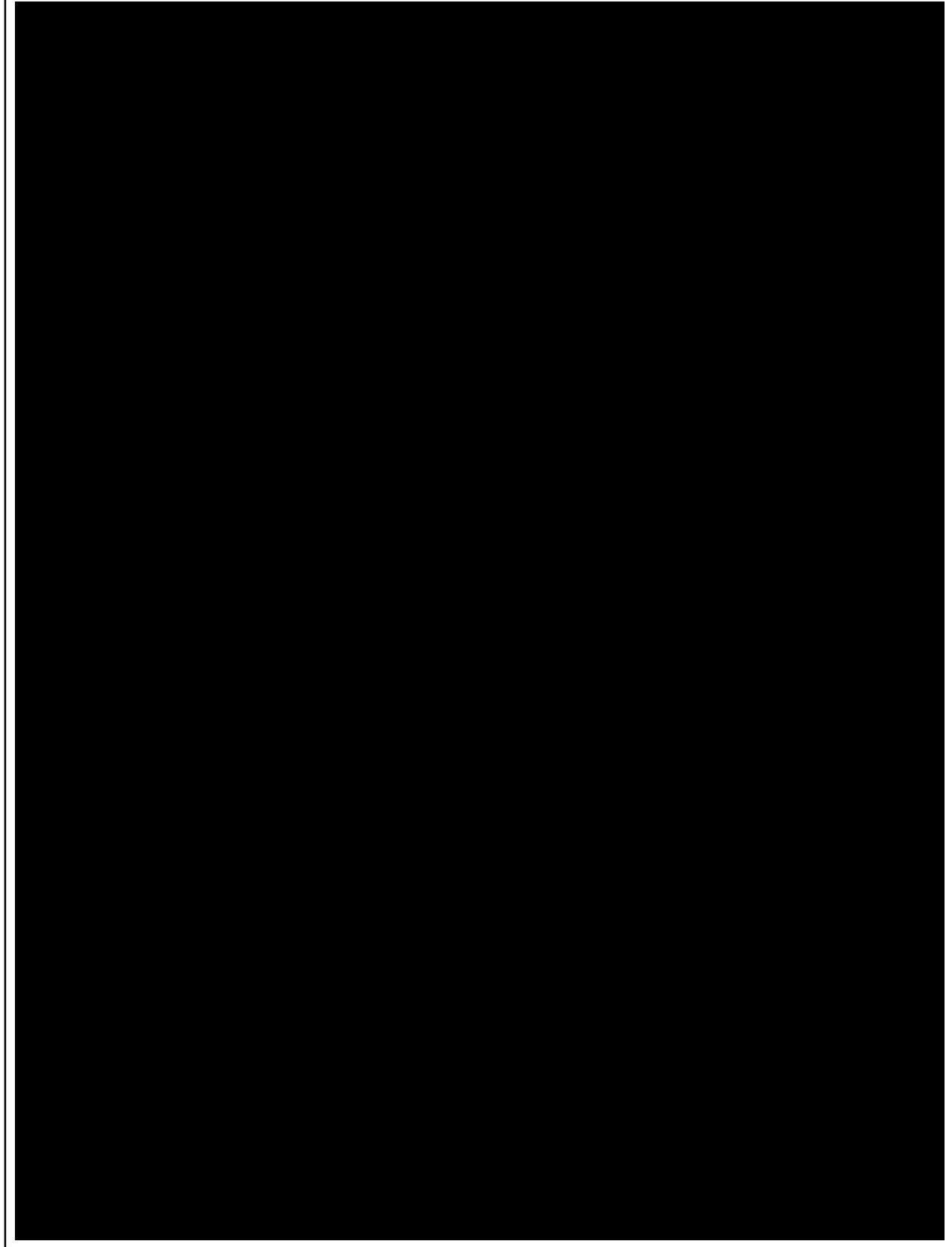
12 Q Mark Geragos.

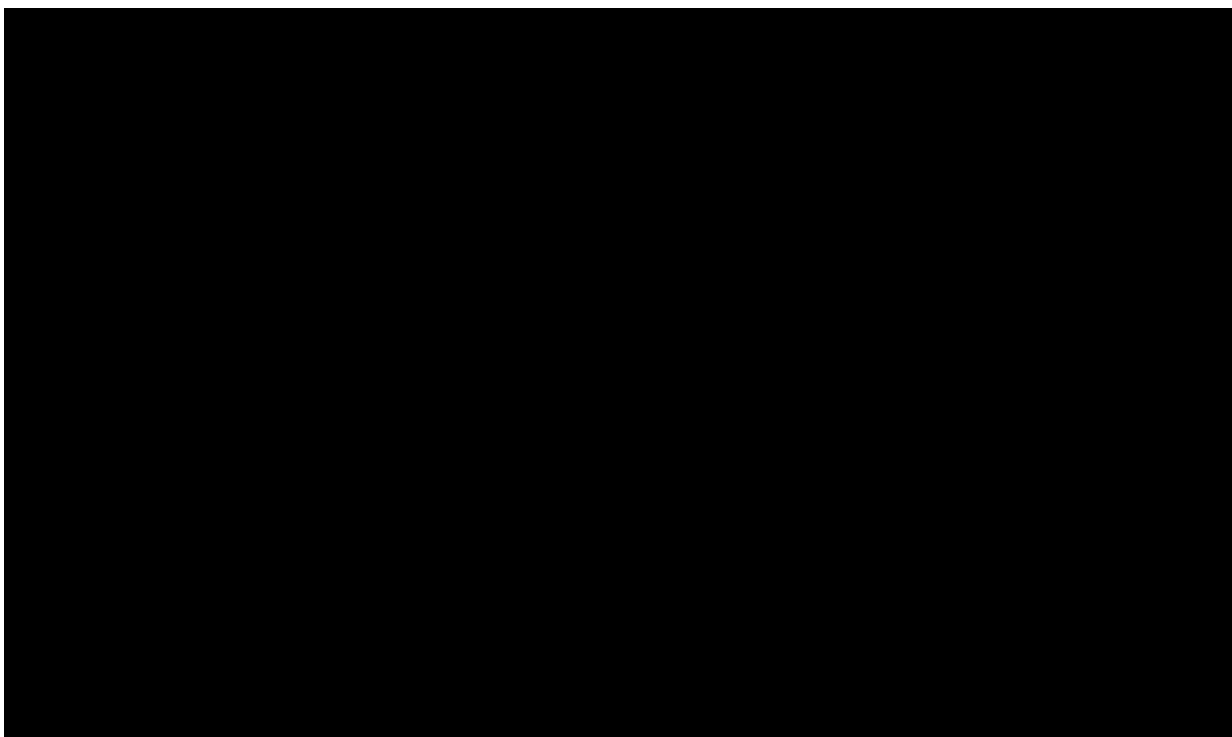
13 A Is he a lawyer?

14 Q Yes.

15 A I did not, but I have heard the
16 name from Jeff.







12 Q The last disbursement on this
13 form is January 23, 2018, again, the
14 Zionist Organization of America for
15 \$50,000.

16 What was the purpose of that
17 contribution?

18 A I believe for the ZOA dinner.

19 Q Say it again?

20 A I believe it was for the ZOA
21 2018 dinner.

22 Q That's the same dinner that was
23 funded with the initial grant?

24 MS. YUSUF: Objection.

25 Misstates the witness' testimony.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q The record shows it was for the
3 ZOA dinner, Z-O-A.

4 So just to clarify, the initial
5 grant to ZOA was for the 2017 dinner and
6 the subsequent grant was for the 2018 ZOA
7 dinner?

8 A I think that's what it says.

9 Q It doesn't say that, but if
10 that's what you're saying, then that's
11 what you're saying. It just says 50,000,
12 January 23, Zionist Organization of
13 America.

14 A I don't really recall the -- but
15 this is what I'm assuming.

16 Q Okay.

17 A I'll invite you to the dinner
18 instead of Ahmed.

19 Q I'd love that.

20 MR. WOLOSKY: I think we're at a
21 natural breaking point here. So I
22 would propose that we adjourn for
23 lunch.

24 THE WITNESS: Okay. How long is
25 lunch?

1 Allaham - ATTORNEYS' EYES ONLY

2 MR. WOLOSKY: An hour. Does
3 that work for you?

4 THE WITNESS: Yes.

5 THE VIDEOGRAPHER: The time is
6 12:29 p.m., and we're going off the
7 record.

8 (Thereupon, a recess was taken,
9 and then the proceedings continued as
10 follows:)

11 THE VIDEOGRAPHER: This is the
12 start of media labeled number 4. Time
13 now is 1:35 p.m., and we're back on
14 the record.

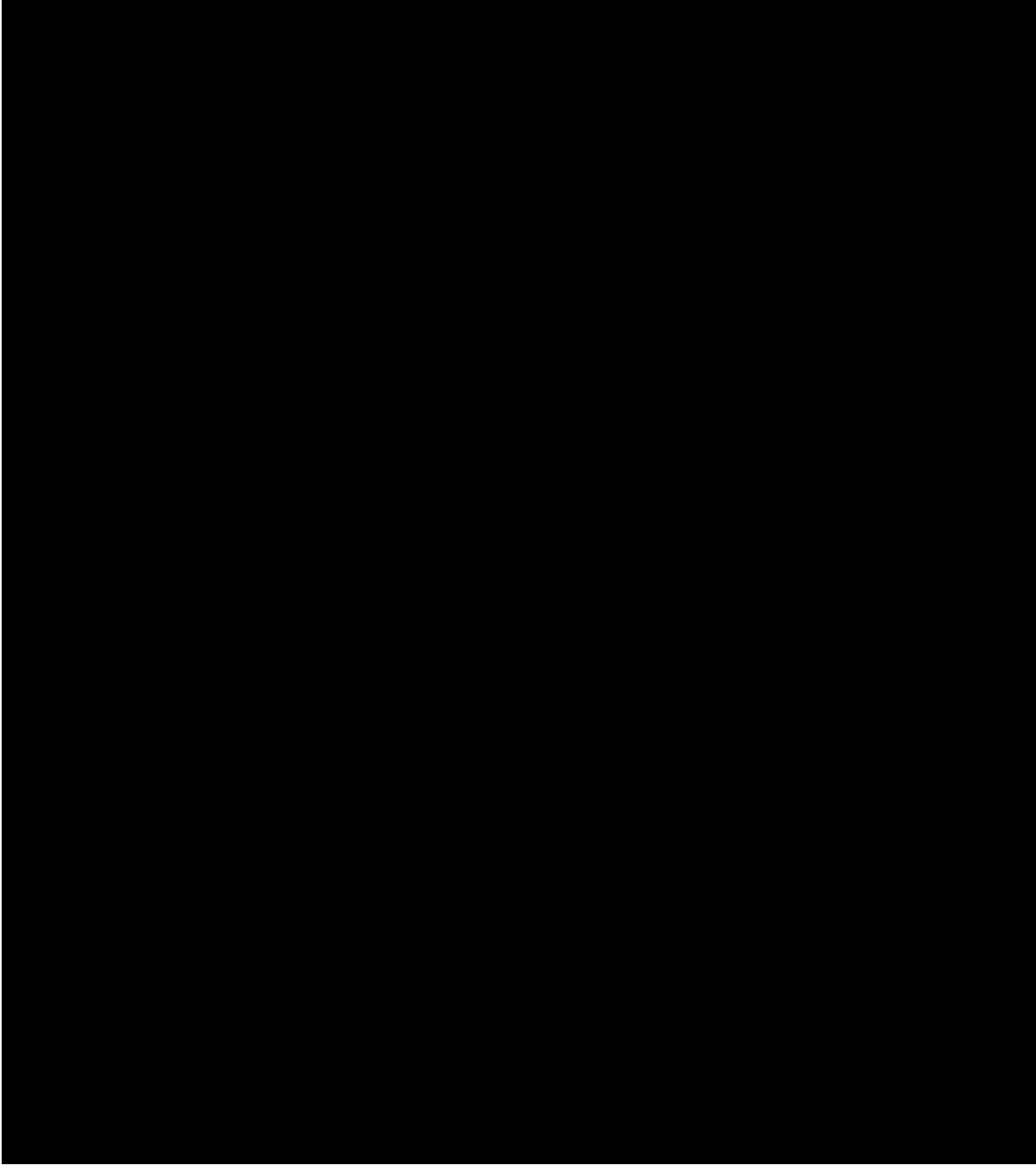
15 BY MR. WOLOSKY:

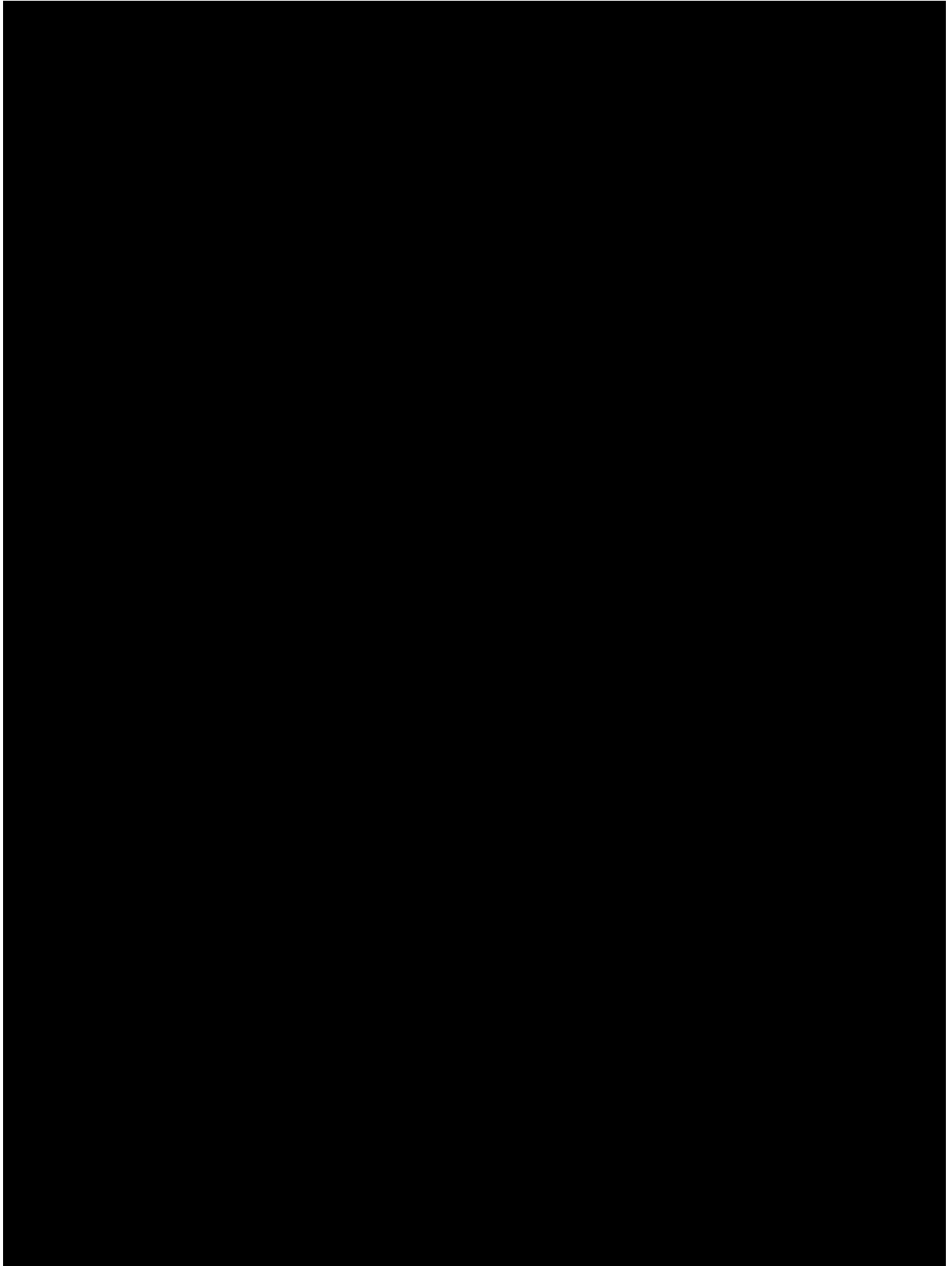
16 Q Good afternoon, Mr. Allaham.
17 Joey?

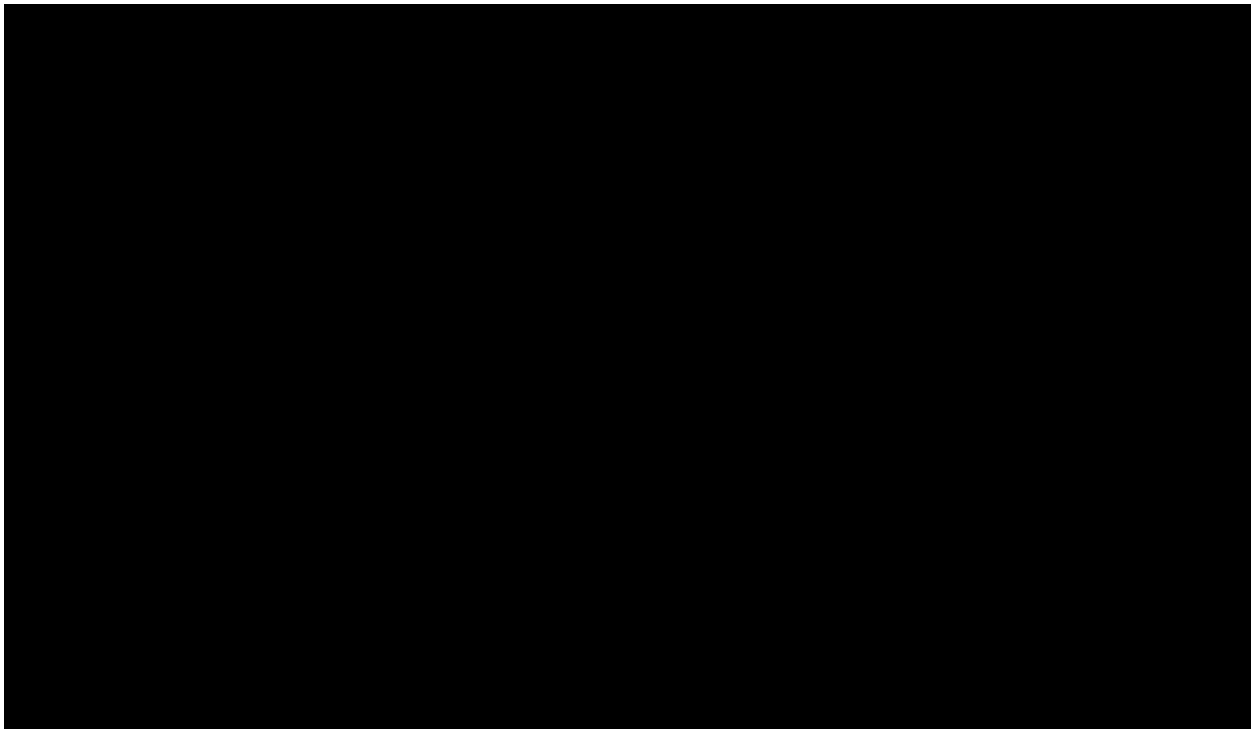
18 A Exactly. Good afternoon.

19 Q I'd like to direct your
20 attention back to Exhibit 3. It's the
21 Politico article dated June 7, 2018. It's
22 the article in which you were quoted as
23 saying, quote, "'Qatar enjoys portraying
24 themselves as the purveyor of peace in the
25 region, but this could not be further from

1 Allaham - ATTORNEYS' EYES ONLY
2 the truth,'" closed quote, "Allaham said
3 in a sharp reversal from his past
4 position."







12 Q I'm going to show you again your
13 phone records. This is Exhibit 7.

14 You have that binder in front of
15 you.

16 MS. YUSUF: Which binder,
17 Counsel? There are two.

18 MR. WOLOSKY: It is binder 1.

19 Q And what I will tell you -- and
20 you're obviously free to go find these on
21 the page numbers that are identified --
22 that I'll identify.

23 But there were 11 phone calls
24 that took place with Mr. Benomar in June
25 of 2017. They are reflected on pages --

1 Allaham - ATTORNEYS' EYES ONLY
2 volume 1 of Exhibit 7 -- 315, 321, 329,
3 336, 338, and 345.

4 So is it fair to say that your
5 contact with Mr. Benomar began in June?

6 MS. YUSUF: Objection.

7 MR. GIMBEL: I would object to
8 it assumes facts that are not on the
9 record.

10 BY MR. WOLOSKY:

11 Q Your first call with Mr. Benomar
12 in June of 2017 was on June 16th, and it
13 is on page 315 of Volume 1.

14 MR. GIMBEL: Objection to
15 counsel testifying.

16 Q Mr. Allaham, can you please turn
17 to page 315 of Volume 1.

18 A Okay.

19 Q Okay.

20 Now, if you look in the
21 left-hand column, it says "Calling
22 number."

23 Do you see that?

24 A Yes.

25 Q And 917-570-6132 is your number,

1 Allaham - ATTORNEYS' EYES ONLY

2 correct?

3 A Correct.

4 Q And do you know if 917-442-7695
5 is Mr. Benomar's number?

6 A I assume it is.

7 Q Okay.

8 I'm happy to refresh your
9 recollection by showing you the WhatsApp
10 messages that are --

11 A No. I remember 442 is the
12 first --

13 Q And that's Benomar, right?

14 A Yeah.

15 Q Okay.

16 So, if you see, there are phone
17 calls between your number and
18 Mr. Benomar's number, 917-442-7695, that
19 begin on June 16 at 20:55 and 55 seconds.

20 Do you see that?

21 A Yes.

22 Q Okay.

23 And then I will represent to you
24 that those calls continue.

25 But for purposes of establishing

1 Allaham - ATTORNEYS' EYES ONLY
2 when you first began contact with
3 Mr. Benomar, it appears that that contact
4 began in mid-June of 2017.

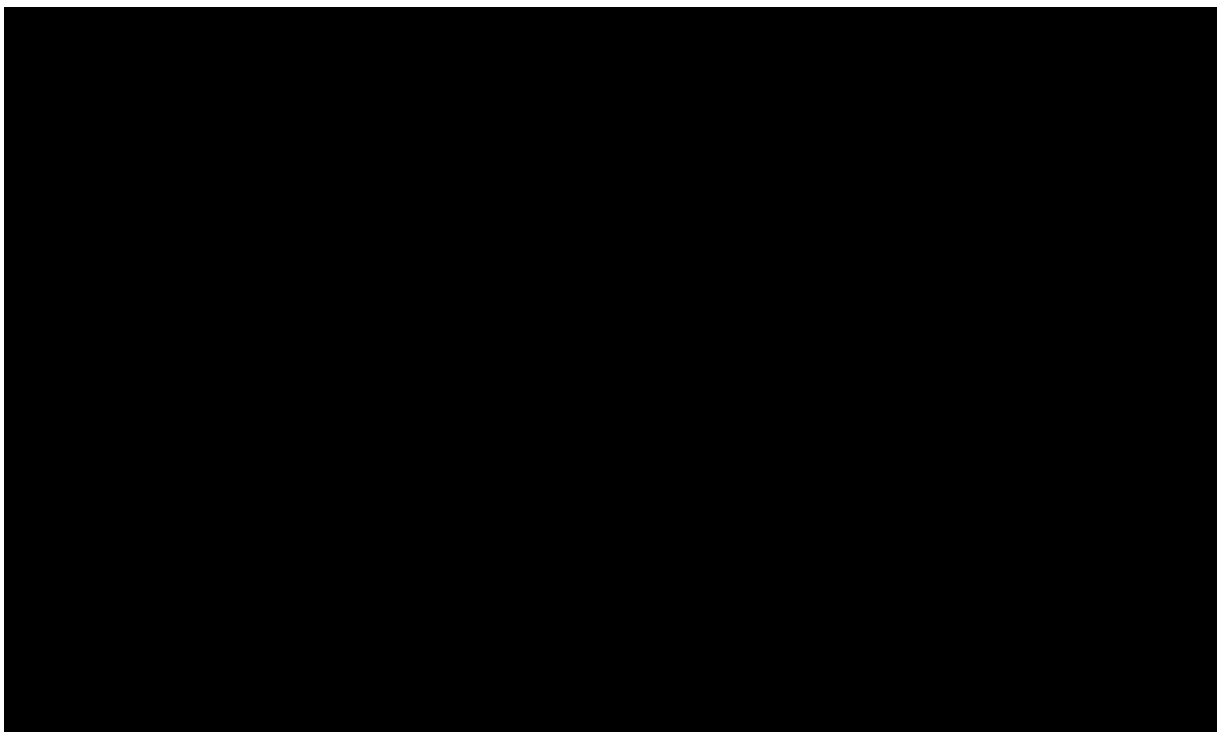
5 MS. YUSUF: Objection. Assumes
6 facts not in evidence.

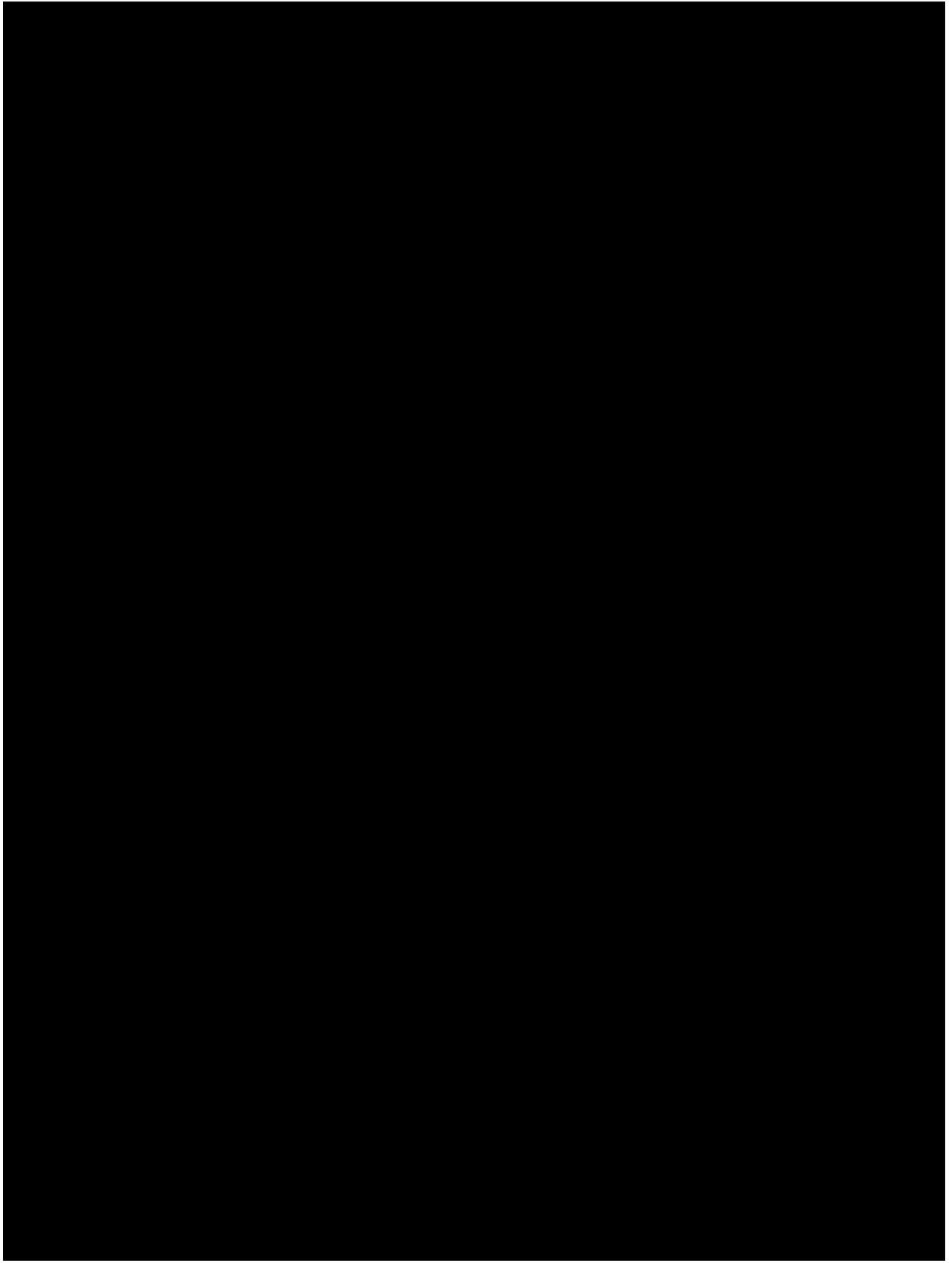
7 MR. GIMBEL: Objection to form.
8 BY MR. WOLOSKY:

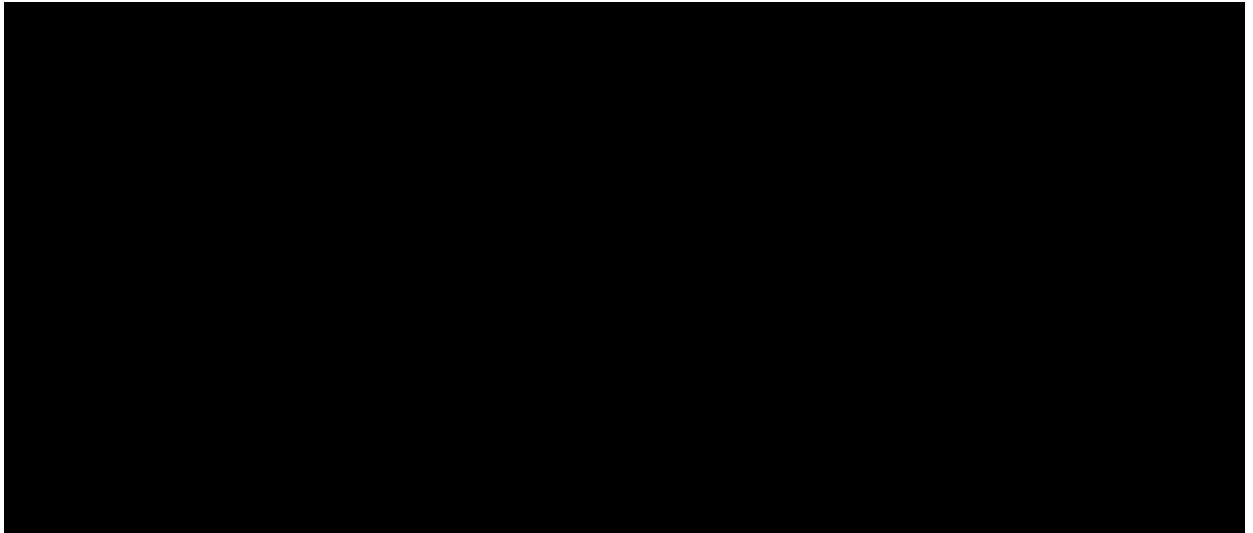
9 Q Would you agree that you had
10 telephone calls with Mr. Benomar on June
11 16, 2017?

12 A It states it. I see it in front
13 of me.

14 Q Okay.







9 Q And how did you meet Jamal?

10 A I was working in Syria in 2010.

11 I've known him for before that, so,
12 probably, I've known him for ten years.

13 So I always liked to ask him something if
14 I had some international affairs or -- for
15 his point of view. So I've known -- had a
16 discussion with him about Syria and how to
17 make peace back then and how to resolve
18 the -- if I recall, the uprising, the
19 whatever that took place.

20 Q And you mentioned that you met
21 him around this time period, 2017, at an
22 event; what was that event?

23 MS. YUSUF: Objection.

24 Misstates.

25 A I don't remember. It was some

1 Allaham - ATTORNEYS' EYES ONLY
2 bar mitzvah or wedding. I'm not sure.
3 There's a lot of those.

4 Q Was it here in New York?

5 A Yes.

6 Q Was he a patron at your
7 restaurant?

8 A He would come often, I would
9 say.

10 Q So going back to your trips to
11 Qatar.

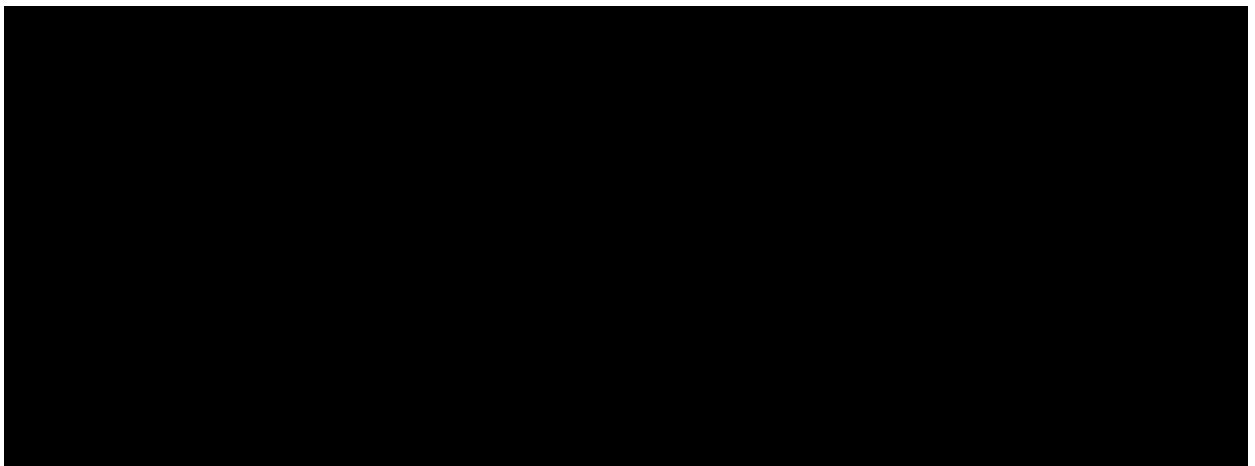
12 A Can I put this away?

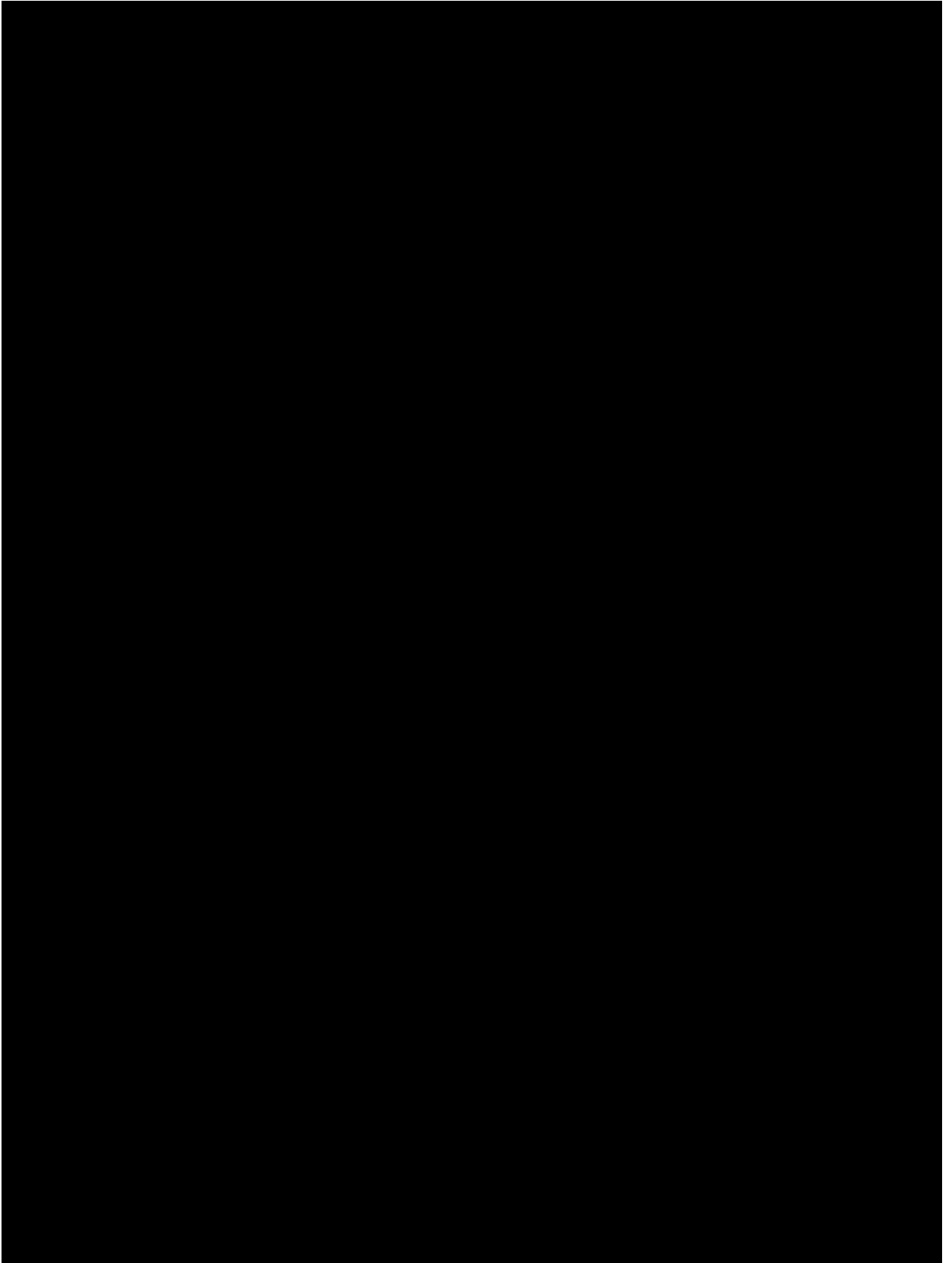
13 Q Oh, yes.

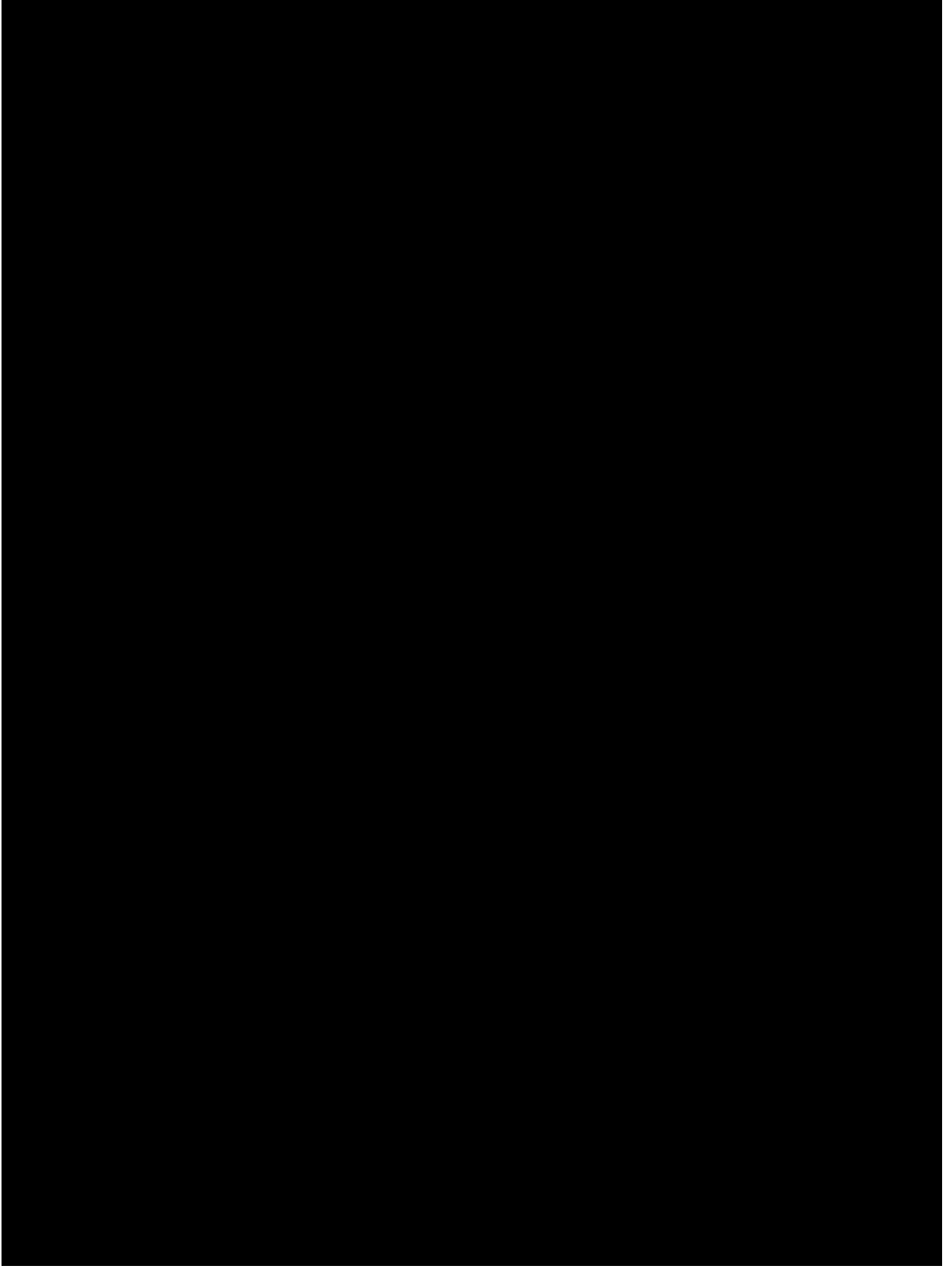
14 A I'm not taking this with me; you
15 can keep it.

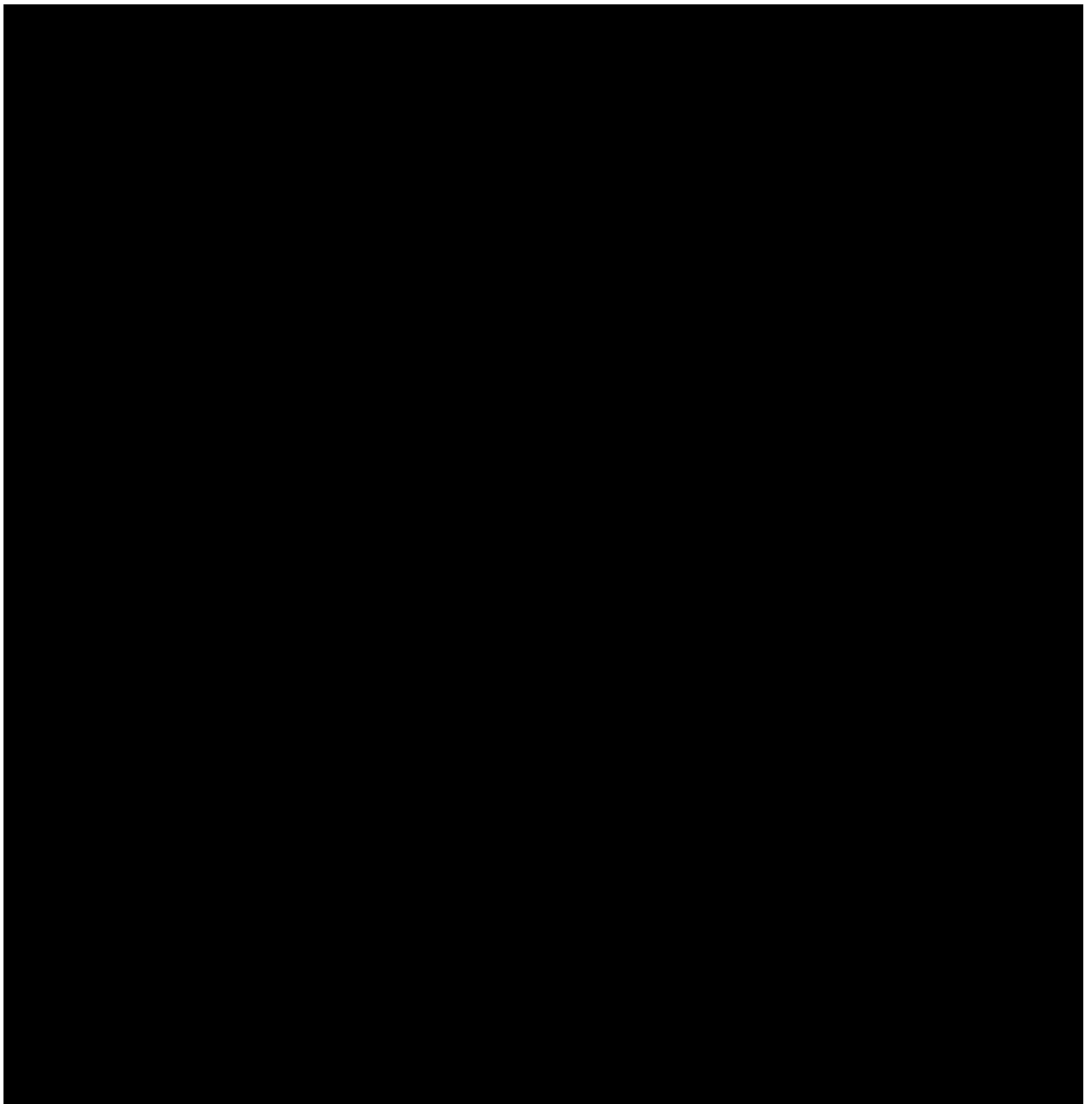
16 MR. WOLOSKY: You want to grab
17 it for me? You can.

18 BY MR. WOLOSKY:









20 Q When you traveled to Qatar, did
21 you travel on your U.S. passport?

22 A What other passport would I
23 travel on?

24 Q Do you have any other passports?

25 A I don't.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q You testified earlier about your
3 use of the phone number 917-570-6132.

4 Do you recall that?

5 A That's my phone number.

6 Q And you testified that the
7 carrier for that phone number is Sprint.

8 A Yes.

9 Q Who is the manufacturer of the
10 phone that you use to communicate on that
11 phone number?

12 A Apple.

13 Q What model is the phone?

14 A Now? Today? The latest one,
15 the 10.

16 Q And what was it in 2017?

17 A The one before it; whatever it
18 was before.

19 Q Do you know what operating
20 system is used on your current phone?

21 A What does that mean,
22 "operating"?

23 Q IOS?

24 A I have no idea.

25 Q And you don't know what

1 Allaham - ATTORNEYS' EYES ONLY
2 operating system was used on your previous
3 phone, the one you used in 2017?

4 A No.

5 Q And you -- did you make your
6 mobile phone available to be searched for
7 documents responsive to the subpoena
8 served on you?

9 MS. YUSUF: I'm just going to
10 state an objection. Don't -- you can
11 answer his question, but don't discuss
12 anything that has to do with
13 attorney-client privilege.

14 MR. WOLOSKY: I don't think I
15 asked anything about communications
16 with attorneys.

17 Can you re-read the question.
18 (Record read)

19 A Yes.

20 Q Do you have any other mobile
21 phones?

22 A In terms? Meaning?

23 Q How many mobile phones do you
24 have?

25 A I only carry one.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Okay. Do you have any others
3 that you don't carry around with you?

4 A I mean, we have one for the
5 whole, entire family as an emergency.

6 Q And what's the phone number for
7 that phone?

8 A I don't know it by heart.

9 Q Do you know the carrier?

10 A Could be Sprint, maybe. I'm not
11 sure.

12 Q And do you know the
13 manufacturer? Is it Apple?

14 A Yes.

15 Q And do you know what model it
16 is?

17 A It's definitely an older phone,
18 so I'm not sure. We don't know.

19 Q Did you make that phone
20 available to be searched for documents
21 responsive to the subpoena served on you?

22 A No, but I don't usually use it.

23 Q Have you had any other mobile
24 phones since March 1, 2017?

25 A Rephrase that. Meaning?

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Have you had any other mobile
3 phones since March 1, 2017?

4 MS. YUSUF: Counselor, your -- I
5 just want to understand your question.
6 You're referring to other than the
7 ones he has already identified?

8 MR. WOLOSKY: Yes.

9 MS. YUSUF: The 10 and the prior
10 one.

11 MR. WOLOSKY: Yes.

12 BY MR. WOLOSKY:

13 Q So you testified, I believe,
14 that you currently have a 10?

15 A Yes.

16 Q Last year, you had the prior
17 model?

18 A Yes.

19 Q Other than those two phones,
20 have you had any other mobile phones since
21 March 1, 2017?

22 A No.

23 Q And other than the family phone
24 you testified about.

25 A No, I don't.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Do you have any landlines,
3 landline telephones, at your home?

4 A Yes.

5 Q What's the phone number for your
6 landline phone?

7 A I have no idea.

8 Q Do you know who the provider is?

9 A I assume it's Spectrum,
10 probably.

11 Q Spectrum?

12 A Probably.

13 Q Is that a cable company?

14 A It's like the cable and
15 everything.

16 Q So is it an IP-based phone, or
17 is it a traditional landline phone?

18 A I have no idea. I'm not that
19 sophisticated. I don't know.

20 Q Do you ever use that home phone
21 number for work-related calls?

22 A I could -- 99 percent point 9,
23 no.

24 Q Do you have landline telephones
25 at your business?

1 Allaham - ATTORNEYS' EYES ONLY

2 MS. YUSUF: Objection.

3 A No.

4 Q Do you ever use burner phones?

5 A What's a burner phone?

6 Q Do you ever use temporary phones
7 that you use only for a short period of
8 time for a specific purpose?

9 A No, never.

10 Q When you travel to Qatar, do you
11 use another phone or your phone -- your
12 iPhone that you testified about?

13 A Usually, my phone. My phone is
14 working in Qatar.

15 Q Do you ever use other phones
16 when you're in Qatar on business?

17 A No. Sometimes, the driver's, if
18 my phones don't have connections or -- but
19 usually my phones.

20 Q When you replaced your phone
21 that you used in 2017 for the current
22 iPhone 10 that you use, did you destroy
23 your previous phone?

24 A I don't think I destroyed it. I
25 would usually exchange it, yes, swipe it.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Do you have possession of it
3 today?

4 A I don't believe so, no.

5 Q To the best of your knowledge,
6 what happened to that old phone?

7 A I think it gets mailed back.
8 I'm on a plan, I believe. Every new phone
9 comes out, I just trade in.

10 Q How do you maintain your
11 contacts?

12 A On my phone.

13 Q On the Apple contacts --

14 A Yeah.

15 Q -- application?

16 A Not Apple. Whatever is on the
17 phone.

18 Q Do you maintain contacts in any
19 other format or location?

20 A No.

21 MS. YUSUF: Objection to form.

22 You can answer.

23 A No.

24 Q Did you provide your contacts to
25 be searched for documents responsive to

1 Allaham - ATTORNEYS' EYES ONLY

2 the subpoena served on you?

3 MS. YUSUF: Objection to form.

4 A I gave my phone.

5 Q And it included your contacts?

6 A Yes.

7 Q What devices do you use to
8 communicate via text message?

9 A My cell phone.

10 Q Is it the same cell phone and
11 phones that we've been discussing?

12 A Yes.

13 Q And what services do you use to
14 communicate via text message?

15 You use WhatsApp, correct?

16 A I -- one of the apps I use is
17 WhatsApp.

18 Q And what are some of the
19 additional apps that you use?

20 A I use text. That's usually what
21 I use. I have other apps, but I don't
22 usually -- I don't use them.

23 Q What are some of the other apps
24 that you occasionally use?

25 A Mostly WhatsApp.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Do you use Signal?

3 A Very rarely.

4 Q Do you use it for work relating
5 to Qatar.

6 Possibly?

7 A No. They don't have -- they
8 don't usually communicate on Signal.

9 Q Do you use Telegram?

10 A What's Telegram?

11 Q It's an app.

12 A I don't believe I have it.

13 Q Do you use Wickr?

14 A I don't believe so.

15 Q Do you use Skype?

16 A No.

17 Q Do you use FaceTime?

18 A Yes.

19 Q Do you use FaceTime for
20 communications relating to your work for
21 Qatar?

22 A No.

23 Q Do you use Facebook Messenger?

24 A I don't even know how to go on
25 my Facebook.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Do you use LinkedIn to
3 communicate?

4 A I don't even know how to go on
5 LinkedIn.

6 Q Do you use GroupMe?

7 A No.

8 Q Did you provide your Signal
9 messages to be searched for documents
10 responsive to the subpoena served on you?

11 A I mean, I gave my phone, so I
12 have no idea what they were looking for.

13 Q Did you provide your texts to be
14 searched for documents responsive to the
15 subpoena served on you?

16 A Again, I gave my phone for the
17 day, and that's very hard for me to
18 manage.

19 Q Do you backup your device
20 regularly to iCloud?

21 A I have no idea.

22 Q Do you know if you disabled
23 automatic backups on iCloud?

24 A I'm not aware of it.

25 Q Do you have any computers at

1 Allaham - ATTORNEYS' EYES ONLY

2 your home?

3 A Not mine. I never use. For the
4 kids. I never use it.

5 Q You don't use any computers at
6 all?

7 A Never, no.

8 Q Do you use your iPhone?

9 A Mostly, yes.

10 Q So you don't have any computers
11 that you use at your office?

12 A I don't use any computer. I
13 have not had a computer probably in ten
14 years. I have my brain, so --

15 Q Do you use any tablets?

16 A Meaning iPad?

17 Q Yes.

18 A When I watch shows, usually.

19 Q Do you use them for
20 communications?

21 A No.

22 Q What devices do you use to
23 communicate by e-mail?

24 A My phone.

25 Q Not your computer?

1 Allaham - ATTORNEYS' EYES ONLY

2 MS. YUSUF: Objection.

3 A No. I do not have a computer.

4 Q Not your tablet?

5 A No. I have a tablet, but I have
6 to tell you it's all greasy and broken, so
7 I don't like to touch it. I see my kids
8 use it as a --

9 Q We're glad you didn't bring it
10 with you.

11 What software applications do
12 you use to compose, read, and send e-mail?

13 A Whatever is on -- I have in my
14 phone.

15 Q Do you know if it's Outlook?

16 A I have no idea.

17 Q Do all of your various e-mail
18 accounts go into the same display?

19 A Correct, except the Proton,
20 which I don't use, usually.

21 Q But you have a Proton account?

22 A I have the Stonington.

23 Q That's right.

24 Have you ever used an
25 application called Thunderbird?

1 Allaham - ATTORNEYS' EYES ONLY

2 A No.

3 Q Can you tell me the e-mail
4 addresses that you use for either personal
5 or business activities.

6 A Mostly, my
7 josephallaham@gmail.com.
8 Joey@alexisstrategies, and icloud.com, and
9 joey@Stonington.

10 Q I believe your iCloud e-mail is
11 joeyallaham@icloud.com.

12 Does that sound right?

13 A Probably, yes.

14 Q Do you still have access to your
15 e-mail address
16 joey@stoningtonstrategies.com?

17 A Yes.

18 Q Do you use that regularly?

19 A Not at all.

20 Q What is Alexis Strategies?

21 A It's just a website. You know,
22 I wanted to -- I was debating Lexington or
23 Alexis, and ended up with Lexington, but I
24 never set up the e-mail because I have too
25 many e-mail addresses, and that was the

1 Allaham - ATTORNEYS' EYES ONLY
2 e-mail I landed with.

3 Q So what is your Alexis
4 Strategies e-mail address for --

5 A I think joey@alexisstrategies.

6 Q Joey@.

7 And does anyone else have an
8 alexisstrategies.com e-mail address?

9 A No.

10 Q Is Alexis Strategies a company?

11 A No.

12 Q It's just an e-mail address?

13 A A domain.

14 Q A domain.

15 A I own maybe 100 domains. It's
16 just every time I come up with a name, I
17 like to buy it. I spent \$12. I used to
18 have that sickness, but I stopped.

19 Q So I think you confirmed this
20 already, but the entity that hosts the
21 stoningtonstrategies.com e-mail address is
22 ProtonMail, correct?

23 A Again? Sorry.

24 Q The entity that hosts the
25 stoningtonstrategies.com e-mail address

1 Allaham - ATTORNEYS' EYES ONLY

2 that you have --

3 A Yes.

4 Q -- is ProtonMail?

5 A Yes.

6 Q Why did you feel it was
7 necessary to have a ProtonMail-linked
8 e-mail address?

9 MS. YUSUF: Objection.

10 A I was told that it's a safer
11 e-mail address.

12 Q Told by whom?

13 A I mean, I don't recall, but
14 it's -- I mean, I read it -- a lot about
15 it, read a lot that Proton is the safest
16 e-mail address to have.

17 Q So was it your idea, or was it
18 Nick Muzin's idea to have ProtonMail host
19 the stoningtonstrategies.com e-mails?

20 A No, I think it was the tech
21 person; he suggested that's the best, most
22 efficient way.

23 Q The tech person at which
24 company?

25 A The guy who I told you I use.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q So, then, did you suggest it to
3 Nick?

4 A No. Well, I introduced him to
5 Nick to do his website. So it's my guy.

6 And even I have to go back to
7 the real estate. I forgot that I had
8 another website called popupgenius.com, my
9 concept to do pop-ups. You can check it
10 out; it's still up and running. It was
11 part of the real estate that I did.

12 So I told you that Baskhar does
13 websites, and I introduced him to Nick,
14 and that's how the Proton -- he said,
15 Proton, since you guys are dealing with
16 government and stuff, it's the safest way.

17 Q And, I'm sorry, his name is
18 Baskhar?

19 A Yes.

20 Q B-A-S-C-A-R?

21 A B-A-S-K-H-A-R.

22 Q Is that his first name or his
23 last name?

24 A First name.

25 Q Do you know, what's his last

1 Allaham - ATTORNEYS' EYES ONLY

2 name?

3 A I have no idea.

4 Q Does he live here in New York?

5 A No.

6 Q Washington?

7 A No.

8 Q Qatar?

9 A No.

10 Q Where does he live?

11 A India.

12 Q India?

13 A He's in India. Nobody uses the
14 site. He's in India.

15 Q Aside from the Gmail account,
16 the iCloud account, the Alexis Strategies
17 account, and the Stonington Strategies
18 account, have you used other e-mail
19 addresses since March 1, 2017?

20 A No.

21 Q Do you know what internet
22 service you use at home?

23 A I said probably Spectrum.

24 Q Spectrum?

25 A Used to be Verizon, and now it's

1 Allaham - ATTORNEYS' EYES ONLY
2 Spectrum's.

3 Q And do you have any special
4 plans that you use for internet service
5 when you're traveling?

6 MS. YUSUF: Objection to form.

7 A "Special plan" meaning?

8 Q What internet services do you
9 use while traveling?

10 A Sprint.

11 Q Do you ever purchase internet
12 time overseas when you're traveling?

13 A No. I think I have the plan; I
14 think 19.99 for international.

15 Q So that's an international data
16 plan?

17 A I believe so. I try not to
18 abuse it.

19 Q When did you first become aware
20 of the litigation by Mr. Broidy against
21 the State of Qatar and others?

22 A I think -- I'm not -- I don't
23 recall whether I read about it or Nick
24 told me. I'm not sure.

25 Q Do you recall whether you

1 Allaham - ATTORNEYS' EYES ONLY
2 learned about it on the day that a
3 complaint was filed, on March 26, 2018?

4 A I'm not -- probably. I don't
5 recall exactly how, but --

6 Q And I'd like to show you a
7 document that we have marked for
8 identification as Exhibit 19.

9 I'm sorry, it is Exhibit 5, and
10 you already have it. You already have
11 that exhibit.

12 If I can ask you to flip to page
13 41, Bates-stamped page 41.

14 A Yes.

15 Q You have in front of you a
16 document Bates-stamped PROOD00000041.

17 A Yes.

18 Q Okay.

19 Do you see that on March 26,
20 2018 at 3:33 p.m., Nicolas Muzin texts to
21 you a document called "Elliott Broidy
22 Complaint.pdf"?

23 A I see it.

24 Q Is it correct to say that that
25 is the date that you learned about the

1 Allaham - ATTORNEYS' EYES ONLY
2 complaint filed by Mr. Broidy?

3 A Yes.

4 Q And you responded to Mr. Muzin
5 at 3 -- at -- sorry, 4:14 p.m. that same
6 day, "Call me, please."

7 Do you see that?

8 A Yes.

9 Q Why did you ask him to call you?

10 A I don't remember why. This is
11 an hour later, so I don't --

12 Q And since the date of this
13 message, March 26, 2018, have you deleted
14 any e-mails on any of the accounts you
15 identified a moment ago?

16 A I delete e-mails every day. I
17 mean, I get a lot of junk.

18 Q And so it's fair to say that you
19 deleted e-mails that relate to your work
20 for the State of Qatar?

21 MS. YUSUF: Objection.

22 A I don't believe so.

23 Q Since that date, April 26 --
24 March, 26, 2018, have you deleted any
25 messages on services such as WhatsApp?

1 Allaham - ATTORNEYS' EYES ONLY

2 A I mean, I don't know if -- I
3 don't know. I don't believe I deleted,
4 but, usually, I know my memory. I -- so
5 if something is not a video or something,
6 I don't, usually delete stuff that's
7 unrelated to my -- my friend sends me
8 important videos all the time. I don't
9 keep them.

10 Q Did you delete any texts or
11 WhatsApp messages that relate to Nick
12 Muzin or Stonington since the date of the
13 filing of this complaint on March 26?

14 A I do not believe so.

15 Q Did you delete any WhatsApp
16 messages since March 26 that relate to
17 Global Risk Advisors?

18 A I never heard of them.

19 Q Did you delete any messages on
20 WhatsApp since March 26, 2018 that relate
21 to Ahmed Al-Rumaihi?

22 A I don't believe so.

23 Q Did you delete any messages on
24 WhatsApp since March 26, 2018 that relate
25 to Jamal Benomar?

1 Allaham - ATTORNEYS' EYES ONLY

2 A I don't believe so.

3 But, so you know, I do not back
4 up my WhatsApp. I never backed it up. So
5 when I changed phones in 2000, I don't
6 think I deleted anything, so --

7 Q When did you change phones; do
8 you recall?

9 A Whenever the new phone came out.

10 Q And since March 26, 2018, have
11 you deleted any texts that relate -- texts
12 or WhatsApp messages that relate to your
13 work for the State of Qatar?

14 A Not intentionally, no.

15 Q And going back to your practice
16 of deleting e-mails, do you do that once a
17 week, once a day? Is there a regular
18 practice that you follow in deleting your
19 e-mails?

20 A I mean, not really, no. I get a
21 lot of -- a good amount of junk e-mails
22 every day, so --

23 Q So your practice would be to
24 delete only the junk e-mails, or do you
25 delete whole blocks of e-mails that may

1 Allaham - ATTORNEYS' EYES ONLY

2 come in over a certain time period?

3 A Usually, the junk e-mails.

4 Q When did you first become aware
5 of the subpoena for your documents in this
6 case?

7 A When Joel Mowbray called me.

8 Q What did Joel Mulberry say to
9 you?

10 A He basically threatened me.

11 Q How did he threaten you?

12 A On my phone, text.

13 Q What did he say or write to you?

14 A That if I don't cooperate,
15 I'll -- they'll have me as a defendant, I
16 think, or some language -- I have to
17 cooperate with you guys or, you know,
18 stuff with all those -- all different
19 threats that's if I don't do this, they
20 will add me as a defendant.

21 Q You understand that you're not a
22 defendant in this case?

23 A I know, but that was his threats
24 all the time. And that's how he was
25 saying: I'm keeping you because of the --

1 Allaham - ATTORNEYS' EYES ONLY
2 you know, because of your kids -- because
3 I hosted him for free in this past
4 whatever. But it was threats, which is --
5 I found that very disturbing to do.

6 Q And what kind of cooperation was
7 Mr. Mowbray seeking?

8 A I have no idea.

9 Q And did you meet with
10 Mr. Mowbray since the filing of this
11 lawsuit?

12 A Oh, yeah. He met me. Then he
13 came to see me two weeks ago with my
14 lawyers in DC. My lawyer met with him.

15 Q And did you meet with him at
16 other times, since the filing of this
17 lawsuit?

18 A Yes. He came to see me.

19 Q Were those meetings at your
20 request or his request?

21 A Always his request.

22 Q Did you have any interest in
23 speaking with him?

24 A I mean, he threatened me all the
25 time. That's his way of calling me to a

1 Allaham - ATTORNEYS' EYES ONLY
2 meeting, that something bad is happening;
3 the FBI is coming, something urgent was
4 occurring. So he always had a bad
5 approach of calling for a meeting.

6 Q And has the FBI come?

7 A No, not yet.

8 Q They haven't come to talk to
9 you?

10 A No.

11 Q Have you entered into a
12 cooperation agreement with the U.S.
13 Government concerning the hack of
14 Mr. Broidy's e-mails?

15 A Say that again.

16 Q Have you entered into a
17 cooperation agreement or immunity
18 arrangement with the U.S. Government
19 concerning the hack of Mr. Broidy's
20 e-mails?

21 A I don't have anything to do with
22 the hack, and I don't have any agreement
23 with anybody.

24 Q So is the answer to the question
25 I just asked, "No"?

1 Allaham - ATTORNEYS' EYES ONLY

2 MR. WOLOSKY: Please re-read the
3 question.

4 (Record read)

5 A No.

6 Q Have you retained Abbe Lowell?

7 A No.

8 Q Have you retained Michael
9 Bhargava?

10 A No.

11 Q Have you spoken to either
12 Mr. Lowell or Mr. Bhargava?

13 A Define that. What do you mean?
14 Have I --

15 Q Spoken: You move your mouth and
16 words come out.

17 A I mean, did I meet him in the
18 restaurant and spoken to him or picked up
19 the phone and call him?

20 Q Either one.

21 A None, no.

22 Q Has Mr. Muzin retained Abbe
23 Lowell?

24 MS. YUSUF: Objection.

25 A I can't answer for someone else.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q To the best of your knowledge,
3 has Mr. Muzin retained Abbe Lowell?

4 A I don't know.

5 Q Has Mr. Muzin retained Michael
6 Bhargava?

7 MS. YUSUF: Objection.

8 A I don't know.

9 Q I'd like to show you an exhibit
10 that we've marked for identification
11 Allaham Exhibit 19.

12 This is a document that was
13 produced by your attorneys, and it's
14 Bates-stamped PRODOOD00000046 through 51.
15 And it's a series of WhatsApp messages
16 between you, Mr. Muzin and others.

17 MS. YUSUF: Counsel, can we just
18 confirm this is a subset of Exhibit 5,
19 or do you have something else you're
20 referring to?

21 MR. WOLOSKY: There may -- that
22 may have been how it ended up, so --

23 MR. GIMBEL: It is now, so --

24 MR. WOLOSKY: It is? Okay.

25 So then I will correct the

1 Allaham - ATTORNEYS' EYES ONLY
2 record and refer you to the document
3 that's been marked as Exhibit 5, and
4 ask that you please turn to page --
5 that ends in 46.

6 BY MR. WOLOSKY:

7 Q Do you see that page?

8 A Yes.

9 Q The first text message on that
10 page is a text message from you to Nick
11 Muzin on April 5, 2018 at 12:28 p.m.

12 Do you see that?

13 A Yes.

14 Q Now, that is what appears to be
15 a cut-and-paste of an e-mail from Abbe
16 Lowell.

17 Do you see that?

18 A Yes.

19 Q So why is it that you were
20 cutting and pasting an e-mail from Abbe
21 Lowell to Mr. Muzin?

22 A Abbe was asking if we have
23 insurance.

24 Q Why was Abbe asking if you have
25 insurance?

1 Allaham - ATTORNEYS' EYES ONLY

2 MS. YUSUF: Objection. Calls
3 for speculation.

4 MR. GIMBEL: Join.

5 A I think you need to ask Abbe.

6 Q Well, I'll refer you to a text
7 message that you wrote on that same day at
8 12:20 -- sorry -- excuse me, 12:30 p.m.
9 Quote, "That what I said."

10 Do you see that?

11 A Yeah.

12 Q Okay. And why is it -- why did
13 you write that?

14 A It's a communication between me
15 and my lawyer, Matthew.

16 MS. YUSUF: Are you referring --
17 BY MR. WOLOSKY:

18 Q I'm referring to a text message
19 that Mr. Allaham sent to Nick Muzin that
20 says, "That what I said."

21 A "That what I said."

22 MS. YUSUF: He's talking about
23 12:30.

24 BY MR. WOLOSKY:

25 Q 12:30 p.m.

1 Allaham - ATTORNEYS' EYES ONLY

2 A Okay.

3 "That what I said."

4 Q Yes.

5 A Because Nick says, "Interesting.
6 I don't know how that makes a difference
7 to him."

8 I said, "That's what I said."

9 Q Yes.

10 So why is it that you believed
11 that the issue of insurance did not make a
12 difference?

13 MR. GIMBEL: Objection to the
14 form.

15 A I don't know what's the sequence
16 of -- meaning this case had to be defended
17 with insurance or without insurance.

18 Q In which case is it that you
19 were concerned about there being
20 insurance?

21 A Meaning the -- your client's
22 case.

23 Q And what is Mr. Lowell's role in
24 that case?

25 MS. YUSUF: Objection.

1 Allaham - ATTORNEYS' EYES ONLY

2 A I think you need to ask
3 Mr. Lowell.

4 Q And this is an e-mail that you
5 are copying and pasting and sending to
6 Mr. Muzin.

7 A It was not sent to me, that
8 e-mail.

9 Q This is an e-mail that you were
10 copying and pasting and sending to
11 Mr. Muzin.

12 So what is your relationship to
13 this e-mail?

14 A My lawyer, Matthew.

15 Q And what is Matthew's
16 relationship to this e-mail?

17 MS. YUSUF: Objection. Calls
18 for attorney-client-privileged
19 information.

20 MR. WOLOSKY: I'm not asking him
21 about his communications with his
22 counsel.

23 Can you please re-read the
24 question.

25 MS. YUSUF: You're asking about

1 Allaham - ATTORNEYS' EYES ONLY

2 counsel's relationship to the e-mail,
3 which calls for
4 attorney-client-privileged
5 information.

6 BY MR. WOLOSKY:

7 Q What is -- now, are you going to
8 answer that question?

9 A No.

10 Q Why is your lawyer in contact
11 with Abbe Lowell?

12 MS. YUSUF: Objection. Calls
13 for speculation and calls for
14 attorney-client-privileged
15 information.

16 BY MR. WOLOSKY:

17 Q Do you know why your lawyer is
18 in touch with Abbe Lowell?

19 A Again, it's client-privileged
20 information.

21 Q That's not your objection to
22 make.

23 MS. YUSUF: It's the objection I
24 just made:

25 "Why is your client in contact

1 Allaham - ATTORNEYS' EYES ONLY
2 with Abbe Lowell?

3 "Objection. Calls for
4 speculation and
5 attorney-client-privileged
6 information."

7 MR. WOLOSKY: Well, are you
8 instructing him not to answer that
9 question?

10 MS. YUSUF: Yes.

11 BY MR. WOLOSKY:

12 Q And are you not answering that
13 question?

14 A I think I would refer it to my
15 lawyers.

16 Q And I'm asking you, so --

17 MR. WOLOSKY: Can you go back to
18 the pending question, please.

19 (Record read)

20 A Again, I defer it to my lawyers
21 to answer that question.

22 Q So you're not going to answer
23 that question today?

24 A No. I think you can pick up the
25 phone, whatever method you can -- my

1 Allaham - ATTORNEYS' EYES ONLY
2 lawyers can do the same. I'm not going to
3 speak on behalf of my lawyers.

4 Q And what is the role of Michael
5 Bhargava in this e-mail chain?

6 MS. YUSUF: Objection.

7 A I have no idea.

8 Q Do you know who Michael Bhargava
9 is?

10 MS. YUSUF: Objection. Asked
11 and answered.

12 Q You can answer it.

13 A I don't.

14 Q Have you ever met with Abbe
15 Lowell?

16 A I met him many times.

17 Q In what context did you meet
18 him?

19 A In the restaurant. I've met
20 every Jew on this planet.

21 Q We just met today for the first
22 time.

23 A You know, I was told Elliott
24 goes to one of my events and he didn't
25 pay. He owes me. So --

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Have you ever met Abbe Lowell in
3 a professional context in which you have
4 sought his legal services?

5 MS. YUSUF: Objection.

6 A Say that again, please.

7 Q Have you ever met Abbe Lowell in
8 a professional context where you have
9 sought his legal services?

10 A No.

11 MR. WOLOSKY: So I'd like to go
12 back to the attorney-client privilege
13 assertions given that answer.

14 Will you allow him to answer
15 those questions?

16 MS. YUSUF: No.

17 MR. WOLOSKY: On what basis?

18 MS. YUSUF: Attorney-client
19 privilege.

20 MR. WOLOSKY: He just testified
21 that he never had any contact with
22 Abbe Lowell in an attorney-client
23 relationship.

24 MS. YUSUF: You asked him if he
25 ever met Abbe Lowell in a professional

1 Allaham - ATTORNEYS' EYES ONLY
2 context where he has sought his legal
3 services.

4 MR. WOLOSKY: And he answered
5 no.

6 MS. YUSUF: Right.

7 MR. WOLOSKY: So how does he
8 have an attorney-client relationship?

9 MS. YUSUF: I'm not testifying
10 to -- I'm stating my objection, and my
11 client's not answering based on that.

12 MR. WOLOSKY: You're instructing
13 him not to answer, which is different
14 than stating an objection.

15 MS. YUSUF: I'm sorry,
16 Counselor, can you restate that.

17 MR. WOLOSKY: If you're stating
18 an objection, then your objection can
19 be noted for the record and he can
20 answer the question.

21 MR. GIMBEL: I, for one, have
22 long since lost the thread of what
23 this question is, so I would ask that
24 it either be re-read or restated.

25 MR. WOLOSKY: The question is:

1 Allaham - ATTORNEYS' EYES ONLY

2 Have you ever met Abbe Lowell in a
3 professional context in which you have
4 sought his legal advice.

5 The answer was "no."

6 So given that there appears to
7 have never been contact with Abbe
8 Lowell, aside from in a social
9 context, I've asked counsel if she
10 will reconsider her instruction not to
11 answer questions concerning
12 communications with or concerning Abbe
13 Lowell concerning which she
14 asserted -- she instructed her client
15 not to answer.

16 MS. YUSUF: No, I will not
17 reconsider it. I think there's
18 information you don't have. Perhaps
19 an off-the-record discussion would be
20 helpful.

21 MR. WOLOSKY: Okay.

22 Can we have it right now?

23 MS. YUSUF: Yes. Let's just
24 step outside.

25 We're going to go off the record

1 Allaham - ATTORNEYS' EYES ONLY
2 for a minute.

3 THE VIDEOGRAPHER: The time is
4 2:31 p.m., and we're going off the
5 record.

6 (Thereupon, a recess was taken,
7 and then the proceedings continued as
8 follows:)

9 THE VIDEOGRAPHER: This is the
10 start of media labeled number five.
11 The time now is 2:42 p.m., and we're
12 back on the record.

13 BY MR. WOLOSKY:

14 Q Mr. Allaham, I would like to
15 show you a document that has been marked
16 for identification as Allaham 36.

17 (Whereupon, Document from New
18 York State Department of Corporations,
19 was marked as Allaham Exhibit 36 for
20 identification, as of this date.)

21 BY MR. WOLOSKY:

22 Q Have you seen that document
23 before?

24 A No.

25 Q This is a document from the New

1 Allaham - ATTORNEYS' EYES ONLY
2 York State Department of State Division of
3 Corporations that was filed on November 9,
4 2017, for a limited liability company
5 called Alexis Strategies, LLC.

6 A I see that.

7 Q Did you file this document or
8 cause this document to be filed?

9 A I think see the address now. I
10 used them for accounting for a little bit
11 and might have said I liked the name, but
12 I never even -- I don't believe I picked
13 up this -- the LLC. I don't recall seeing
14 this.

15 Q Did you -- do you recall we
16 discussed earlier an e-mail address
17 called -- that you have called
18 alexisstrategies.com, I believe it was.

19 Do you recall that discussion?

20 A Yes.

21 Q And I believe you testified that
22 Alexis Strategies did not exist as a legal
23 entity.

24 Does this document refresh your
25 recollection?

1 Allaham - ATTORNEYS' EYES ONLY

2 A I have never seen it. So
3 probably if he has done it, I never used
4 it. I never picked it up. It was never
5 picked up.

6 Q So you believe that your
7 accountant filed this document without
8 your knowledge?

9 A No, I probably have called them
10 with the name and they have probably done
11 it. Which is, I believe, that's what
12 happened, but I never used it or I never
13 picked it up.

14 Q What do you mean by you "never
15 picked it up"?

16 A Meaning, when you do analyses,
17 you pick up the paperwork for it. I never
18 picked it up. And this is news to me that
19 it was done.

20 Q So is this an inactive company
21 as far as you know?

22 A Yes, but not -- correct, it is
23 not related to me, absolutely inactive,
24 yes.

25 Q So is it inactive and not

1 Allaham - ATTORNEYS' EYES ONLY
2 related to you or inactive but related to
3 you?

4 A Both. It is not active and it
5 is not related to me. I believe -- I will
6 ask for it, if it is available -- if it is
7 there still, I'll take it.

8 Q And if this company is not
9 active --

10 MR. WOLOSKY: Strike that.

11 Q If this company is not related
12 to you, how do you know that it is
13 inactive?

14 A Because I never used it. I
15 assume he has done it for me because I
16 liked the name. So I don't think it
17 was -- I don't believe it is active. I'm
18 assuming it is not.

19 Q Do you know if it has any bank
20 accounts?

21 A Not to my knowledge, no.

22 Q Who would know, would your
23 accountant know?

24 A I mean, I don't believe there is
25 a bank account, no.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Do you know who owns Alexis
3 Strategies, LLC?

4 A No, I don't.

5 Q Now, a long while ago, before we
6 went off on different topics, I was asking
7 you some questions about your first
8 becoming aware of the subpoena for
9 documents that was served on you in this
10 case.

11 And I referred you to some
12 WhatsApp messages, but you also testified
13 that Joel Mowbray told you about the
14 subpoena and threatened you.

15 Do you recall that?

16 A I mean, I recall he arranged a
17 phone call for you. He asked you to call
18 my lawyer, correct?

19 So he was talking to me about
20 this ongoing. I don't remember.

21 Q But did he specifically inform
22 you about the subpoena served on you in
23 this case?

24 A I believe he told me the
25 subpoena was coming, yes.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Now, if you go back to Exhibit
3 5, it's Exhibit 5, right? Exhibit 5 on
4 page 49. There is a WhatsApp message from
5 Nick Muzin to you dated April 24, 2018,
6 called Allaham subpoena.

7 Do you see that?

8 A Yes.

9 Q And then there is a response
10 from you to Nick Muzin that says, "It is
11 in New York Times."

12 Were you aware of the
13 subpoena --

14 MR. WOLOSKY: Strike that.

15 Q When Muzin sent to you the text
16 on April 24 called Allaham subpoena, did
17 you then become aware of the fact that a
18 subpoena had been served on you?

19 A I'm not sure. I don't know.

20 Q Also, you remember the subpoena
21 being served on you, correct?

22 A It was never served on me
23 personally.

24 Q Served on your lawyer?

25 A Yes.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q You were aware in April that a
3 subpoena had been served on you, correct?

4 A I don't recall.

5 Q Do you know if you have deleted
6 any e-mails on any of your e-mail accounts
7 since the time this subpoena was served on
8 you?

9 A E-mails, meaning?

10 Q E-mails to your various e-mail
11 accounts about what you testified earlier,
12 your Gmail account, your iCloud account,
13 your Alexis Strategies account, and your
14 Stonington strategies account?

15 A I don't believe so, no.

16 Q You don't believe you deleted
17 any e-mails from those accounts since
18 April 24, 2018?

19 A I don't believe so, no.

20 Q Have you deleted any messages on
21 WhatsApp since that date, April 24, 2018?

22 A Again, I told you I delete
23 messages that's inappropriate for my wife
24 to see or my kids.

25 Q Do you recall deleting any

1 Allaham - ATTORNEYS' EYES ONLY
2 messages on WhatsApp since that date
3 related to your work for the State of
4 Qatar?

5 A I don't believe so.

6 Q I'd like to ask you to look at a
7 document that we have marked for
8 identification as Exhibit 21. This is a
9 document that was produced by your
10 attorneys and is Bates stamped
11 PROD00000062 through 65. And it is a
12 letter from Mr. Obermeier of Wiley Rein
13 dated May 17, 2018.

14 (Whereupon, Letter from Stephen
15 Obermeier of Wiley Rein, dated May 17,
16 2018, was marked as Allaham Exhibit 21
17 for identification, as of this date.)

18 BY MR. WOLOSKY:

19 Q Have you seen this letter
20 before?

21 A Yes.

22 Q Did you receive this letter on
23 or around May 17, 2018?

24 A Yes, that's what it says.

25 Q And are you aware that this

1 Allaham - ATTORNEYS' EYES ONLY
2 document instructs you to preserve all of
3 your documents relevant to certain
4 matters?

5 A This is what it says.

6 Q Did you, in fact, preserve
7 documents in accordance with this letter?

8 A Yes.

9 Q When you testified earlier that
10 you deleted e-mails, did you permanently
11 delete them or did they just go into your
12 trash folder?

13 A I don't think I have a trash
14 folder, everything comes up.

15 Q So when you delete documents on
16 your e-mails as you testified to earlier,
17 they are permanently deleted, to the best
18 of your knowledge?

19 A I have no idea. I don't know.

20 Q Did you stop deleting your
21 e-mails after you received a letter from
22 Mr. Obermeier?

23 A In the relation to this lawsuit,
24 I never -- I told you I delete junk
25 e-mails.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q And how about WhatsApp messages,
3 did you stop deleting WhatsApp messages
4 after receiving the letter from
5 Mr. Obermeier?

6 A I believe -- I don't usually
7 delete stuff unless inappropriate.

8 Q I'd like to refer you back to
9 Exhibit 5.

10 When did you first start using
11 WhatsApp?

12 A I don't remember.

13 Q It was prior to 2017?

14 A Probably.

15 Q I'd like to refer you,
16 Mr. Allaham, to page 27 of this exhibit.

17 Do you see on this page there
18 are four messages between you and Mr.
19 Muzin on September 7 and September 8,
20 2017?

21 A Yes.

22 Q Now, there are no additional
23 messages between you and Mr. Muzin that
24 had been produced to us until December 7,
25 2017, which appears on the next page, on

1 Allaham - ATTORNEYS' EYES ONLY
2 pages 28, 29, when you and Mr. Muzin
3 exchanged 15 messages.

4 Did you exchange any WhatsApp
5 messages with Mr. Muzin between September
6 8 and December 7, 2017?

7 A I don't know. I have to check
8 my phone.

9 Q Would you like to check your
10 phone right now?

11 A Do I?

12 Q Go ahead.

13 MS. YUSUF: You're not touching
14 your phone while you're on the record.

15 Q Do you recall if you and Mr.
16 Muzin communicated at all between the
17 dates of September 8 and December 7, 2017?

18 A I don't know. I really do not
19 know.

20 Q Do you have any explanation to
21 offer as to why there are no WhatsApp
22 messages that have been produced by you
23 between you and Mr. Muzin from September 8
24 through December 7, 2017?

25 MS. YUSUF: I'm going to object

1 Allaham - ATTORNEYS' EYES ONLY
2 to form. This production was made in
3 response to a subpoena. So Counsel is
4 asking a general question about
5 communications and why none have been
6 produced as opposed to something
7 specific to the subpoena.

8 MR. WOLOSKY: I'm asking him if
9 he had any communications with Mr.
10 Muzin between September 8 and December
11 7, 2017.

12 MS. YUSUF: And he answered, "I
13 don't know. I really do not know."

14 BY MR. WOLOSKY:

15 Q Did you communicate with Mr.
16 Muzin about things other than your work
17 for the State of Qatar?

18 A I mean, general stuff.

19 Q From the period September 8,
20 which was when you were working with Mr.
21 Muzin on documents that relate to the
22 representation of Qatar, and December 7,
23 2017, did you communicate with Mr. Muzin
24 about subjects other than your work for
25 Qatar?

1 Allaham - ATTORNEYS' EYES ONLY

2 A I'm sure -- I mean, we're
3 friends, I would say.

4 Q And what were some of the
5 subjects that you would have communicated
6 with him about other than the work that
7 you did for the State of Qatar?

8 A His kids, his life, his
9 girlfriend. Personal, social stuff.

10 Q Now, if you flip to pages 30 to
11 31, you'll see that you and Mr. Muzin
12 exchanged 12 messages on January 26 and
13 27, 2018.

14 Do you see that?

15 A Yes.

16 MS. YUSUF: I'm going to object.
17 That's not how many messages were sent
18 on January 26.

19 Q And 27, I said. 26 and 27.

20 MS. YUSUF: I don't see any
21 messages from the 27. So which ones?

22 Q Let me rephrase the question.

23 I'm sorry. Please go to page 29
24 of that exhibit.

25 Do you see a series of text

1 Allaham - ATTORNEYS' EYES ONLY
2 messages between you and Mr. Muzin on
3 December 7, 2017?

4 Do you see that?

5 A Yes.

6 Q And then do you see that the
7 text messages pick up again on January 25,
8 2018?

9 Do you see that?

10 A Yes.

11 Q There are no messages in this
12 record between you and Mr. Muzin between
13 December 7, 2017, and January 25, 2018.

14 Do you see that?

15 A Yes.

16 Q Do you know why that is the
17 case?

18 A No, I don't.

19 Q Did you exchange any WhatsApp
20 messages with Mr. Muzin between those
21 dates?

22 A I don't know.

23 Q Did you and Mr. Muzin
24 communicate at all between those dates?

25 A We probably did. I have to

1 Allaham - ATTORNEYS' EYES ONLY
2 check.

3 Q Is there any reason you can
4 think of why you would not have been
5 communicating by WhatsApp during that time
6 period?

7 A No, there is no reason.

8 Q Now, the first message on
9 January 25, which is on page 29, after
10 that gap of several weeks, is a text
11 message from Nick Muzin to you and it
12 begins, "It is very good."

13 Do you know what he is referring
14 to?

15 A No.

16 Q Was there any prior
17 communication with Mr. Muzin about what
18 was very good?

19 A Again, I'm looking at what you
20 see. I have to check.

21 Q Now, I'll represent to you that
22 there are similar gaps in your WhatsApp
23 communication with Mr. Muzin, on the
24 record, that has been produced to us at
25 other times such as April 24 and May 4,

1 Allaham - ATTORNEYS' EYES ONLY
2 and April 13 and April 19.

3 Are you aware of any reason why
4 there should be gaps in your WhatsApp
5 communication with Mr. Muzin between those
6 dates?

7 MS. YUSUF: Objection.

8 When you say gaps in his
9 communication, you're just referring
10 to the production or something else?

11 BY MR. WOLOSKY:

12 Q You can answer the question.

13 A Again, I think this was produced
14 based on the subpoena. So --

15 Q Is it possible that you deleted
16 the WhatsApp messages that would have --

17 MR. WOLOSKY: Strike that.

18 Q Is it possible that you deleted
19 WhatsApp messages between those dates?

20 A No, I don't believe so.

21 Q I'd like you to please look at a
22 document that we have marked for
23 identification purposes as Exhibit 33.

24 (Whereupon, Supplemental
25 Statement Pursuant to the Foreign

1 Allaham - ATTORNEYS' EYES ONLY
2 Agents Registration Act of 1938, as
3 amended, was marked as Allaham Exhibit
4 33 for identification, as of this
5 date.)

6 BY MR. WOLOSKY:

7 Q It is a supplemental statement
8 filed by Muzin Capital Partners, LLC,
9 pursuant to the Foreign Agents
10 Registration Act of 1938, as amended, and
11 it was filed for the six-month period
12 ending September 30, 2017.

13 Have you seen this document
14 before, Mr. Allaham?

15 A I probably did.

16 Q And what was the context in
17 which you have seen it previously?

18 A Meaning -- say that again.

19 Q Why did you see it previously?

20 A Because I remember my lawyers
21 were doing the registration for it. They
22 were working with Nick's lawyers.

23 Q And who were those lawyers
24 acting for you?

25 A Arent Fox.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q And if you skip to page 10 of
3 this document.

4 A Yes.

5 Q Question 5B reads, "During the
6 six-month reporting period, has a
7 registrant hired as employees or any
8 capacity any persons who rendered or will
9 render services to the registrant directly
10 or in furtherance of any foreign
11 principals other than a clerical or
12 secretarial or in a related or similar
13 capacity," and the box is checked "yes."
14 And your name is listed as such a person
15 who was hired by Muzin Capital Partners,
16 LLC, and it sets forth that you were
17 retained as a consultant in connection
18 with the representation of the democratic
19 party of Albania.

20 Is that accurate?

21 A This is what it reads.

22 Q Is it an accurate statement that
23 you were retained to do work by Mr. Muzin
24 or by his entity in connection with the
25 representation of the democratic party of

1 Allaham - ATTORNEYS' EYES ONLY

2 Albania?

3 A So what's the question?

4 MR. WOLOSKY: Can you please
5 re-read the question.

6 (Record read)

7 A It is.

8 Q And if you turn to page 13 of
9 that same document.

10 A Yes.

11 Q There is a section at the bottom
12 called disbursements, monies.

13 Do you see that?

14 A Yes.

15 Q Okay.

16 And do you see that it records a
17 payment to you or an entity called AFH
18 Associates?

19 A Yes.

20 Q For \$52,000 on April 5, 2017.

21 Do you see that?

22 A Yes.

23 Q Was that payment, in fact, made
24 to you or to your entity, AFH Associates?

25 A Yes.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q And what was that payment for?

3 A For what it states on page 10.

4 Q To do work for the democratic
5 party of Albania?

6 A Not for Albania. Whatever it
7 says on page 10, it describes what the
8 services are.

9 Q And what specifically did you do
10 in furtherance of this representation?

11 MS. YUSUF: I'm going to object
12 to relevance.

13 A Consultant.

14 MR. GIMBEL: It seems like we're
15 deep sea fishing now.

16 Q Consulting to whom, Mr. Muzin?

17 A It says it on page 10. If you
18 would like me to read it to you, or you
19 read it already.

20 Q What work did you do for the
21 democratic party of Albania?

22 A Consultant.

23 Q And what specific facts did you
24 perform in connection with your consulting
25 work?

1 Allaham - ATTORNEYS' EYES ONLY

2 A I don't remember.

3 Q What was the advice that you
4 provided pursuant to your consulting work
5 to the democratic party of Albania?

6 MS. YUSUF: Objection. Assumes
7 facts not in evidence.

8 A I don't remember.

9 Q Did you do any work for the
10 \$52,000 that you received from Mr. Muzin's
11 entity?

12 A Consultant. I was consulted.

13 Q And did you go to Albania?

14 A No.

15 Q Did you meet with any Albanians?

16 A Albanians -- I had a lot of
17 employees that were Albanians so I met
18 with Albanians, yes.

19 Q Now, I'd like for you to look at
20 a document that we have marked for
21 identification as Allaham Exhibit 34.

22 (Whereupon, Short Form
23 Registration Statement Pursuant to the
24 Foreign Agents Registration Act of
25 1938, as amended, was marked as

1 Allaham - ATTORNEYS' EYES ONLY

2 Allaham Exhibit 34 for identification,
3 as of this date.)

4 BY MR. WOLOSKY:

5 Q This is your short form
6 registration statement filed pursuant to
7 the Foreign Agents Registration Act in
8 connection with this same work performed
9 by you and Mr. Muzin for the democratic
10 party of Albania.

11 MS. YUSUF: I'm going to object
12 again on relevance because I really
13 thought we were here relating to the
14 action that was filed in the Central
15 District of California, but hopefully
16 I'll see the connection soon.

17 BY MR. WOLOSKY:

18 Q Do you see on page 1, question
19 11 asks you to describe separately and in
20 detail all services which you will render
21 to the foreign principal?

22 Do you see that box?

23 A Yes.

24 Q And you reply, "The registrant
25 assisted with promoting the visions and

1 Allaham - ATTORNEYS' EYES ONLY
2 goals of the democratic party of Albania
3 to business and political leaders in the
4 United States."

5 Do you see that?

6 A Yes.

7 Q How did you assist in promoting
8 the visions and goals of the democratic
9 party of Albania to business and political
10 leaders in the United States?

11 A I don't remember the -- it's
12 been a while. So -- but they wanted to,
13 you know, get investors and get people to
14 invest in Albania.

15 Q Now, if you turn to the second
16 page of this document, it says that it was
17 signed on November 14, 2017, by you.

18 Do you see that?

19 A I see my name, yes.

20 Q Do you see the date?

21 A Yes.

22 Q And this date is after the date
23 on which you were retained by the State of
24 Qatar, correct?

25 A Yes.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Can you tell me any business or
3 political leaders in the United States
4 that you worked with to promote the
5 visions and goals of the democratic party
6 of Albania?

7 A I never worked with any
8 politicians.

9 Q So what is this money for that
10 you're receiving, \$52,000?

11 A Consulting and -- consultant.
12 Business consulting.

13 Q And if you go back to Exhibit
14 33, on the same page that we were on
15 previously, page 13, there is a section at
16 the top called receipt -- receipts,
17 monies.

18 Do you see that?

19 A Page what?

20 Q Top of page 13.

21 A Yes.

22 Q And there is a company called
23 Biniatta Trade LP which paid \$150,000 in
24 support of this project.

25 Do you see that?

1 Allaham - ATTORNEYS' EYES ONLY

2 A Yes.

3 Q And what is Biniatta Trade LP?

4 MS. YUSUF: Objection.

5 A I don't know.

6 Q Were you engaged in discussions
7 at any point or communications at any
8 point with Mr. Muzin about Biniatta Trade?

9 A No. Not that I recall. I don't
10 want to say no. I don't remember.

11 Q Can you please turn to Exhibit
12 5, page 35.

13 A Exhibit 5?

14 Q Exhibit 5, on page 35.

15 A Yes.

16 Q Okay.

17 Do you see there is a text
18 message from Mr. Muzin to you on March 8,
19 2018, it is the third one from the bottom,
20 and it says, "Broidy is saying Biniatta
21 framed him."

22 Do you see that?

23 A Yes.

24 Q And you respond, "Holy shit."

25 Do you see that?

1 Allaham - ATTORNEYS' EYES ONLY

2 A Yes.

3 Q Does that refresh your
4 recollection of what Biniatta Trade is?

5 A I don't -- no, I don't really
6 remember the -- no, I don't remember the
7 conversation.

8 Q Does it refresh your
9 recollection of communications that you
10 had with Mr. Muzin concerning Biniatta
11 Trade?

12 A No, I don't.

13 Q Is Biniatta Trade a Russian
14 entity to the best of your knowledge?

15 A I have no clue.

16 Q Does it bear any relation to the
17 work that you have done for Qatar?

18 A I'm sorry?

19 Q Does Biniatta Trade bear any
20 relation to the work that you have done
21 for Qatar?

22 A Not to my knowledge at all.

23 Q Does Biniatta Trade bear any
24 relation to the work that you have done or
25 wish to do for Morocco?

1 Allaham - ATTORNEYS' EYES ONLY

2 A No, not to my knowledge.

3 Q Did Biniatta Trade bear any
4 relation to the work that you did for the
5 democratic party of Albania?

6 A Again, I was not involved in
7 that. I don't know. I was a
8 subcontractor so I don't know.

9 Q Do you want to take a short
10 break?

11 A Sure.

12 THE VIDEOGRAPHER: The time is
13 3:16 p.m., and we're going off the
14 record.

15 (Thereupon, a recess was taken,
16 and then the proceedings continued as
17 follows:)

18 THE VIDEOGRAPHER: This is the
19 start of media labeled number 6. It
20 is now 3:31 p.m., and we're back on
21 the record.

22 BY MR. WOLOSKY:

23 Q Mr. Allaham, I'd like to ask you
24 some questions about Stonington
25 Strategies, LLC.

1 Allaham - ATTORNEYS' EYES ONLY

2 Do you know what Stonington
3 Strategies, LLC is?

4 A What do you mean if I know what
5 Stonington is? It's an LLC.

6 Q And do you have an ownership
7 interest in that business?

8 A No.

9 Q Do you know who does?

10 A I assume it's Nick. I'm not
11 sure if there's any others.

12 Q And have you ever been
13 associated with Stonington Strategies,
14 LLC?

15 A What term you mean,
16 "associated"?

17 Q Have you ever done work with
18 Stonington Strategies?

19 A I mean, I work parallel with
20 Nick, so it's a very broad question.

21 Q I'd like to show you an exhibit
22 that we have marked for identification as
23 Exhibit -- Allaham Exhibit 25.

24 (Whereupon, Exhibit A to the
25 registration statement filed by

1 Allaham - ATTORNEYS' EYES ONLY
2 Stonington Strategies, LLC, was marked
3 as Allaham Exhibit 25 for
4 identification, as of this date.)

5 BY MR. WOLOSKY:

6 Q It is a -- it's Exhibit A to the
7 registration statement filed pursuant to
8 the Foreign Agent's Registration Act of
9 1938, filed by Stonington Strategies, LLC
10 as registrant. And it's dated -- the date
11 of filing is September 3, 2017.

12 Have you ever seen this document
13 before, Mr. Allaham?

14 A I'm not sure.

15 Q If you go to box 1, it says,
16 "Name and address of registrant."

17 Do you see that?

18 A Yes.

19 Q Do you see that the address
20 that's provided is 550 Madison Avenue?

21 A Yes.

22 Q That is the address that you
23 used in 2017 for your business interests,
24 correct?

25 A Yes.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Do you have any idea why
3 Stonington Strategies used that address on
4 its FARA Exhibit A form?

5 A No, I don't. I have no idea.

6 Q Did Stonington Strategies
7 maintain an office at 550 Madison Avenue
8 in 2017?

9 A Not to my knowledge, no.

10 Q Did Stonington Strategies use
11 your offices at 550 Madison Avenue in
12 2017?

13 A I don't think -- I believe he
14 needed an address in New York, and he had
15 no address to file his FARA or something,
16 and I was -- it was okay with me, if I
17 recall my recollection. That's the only
18 relationship; he just used my address for
19 New York. He said it was a New York
20 address.

21 Q Do you know why he needed a New
22 York address for his FARA registration
23 form?

24 A I have no idea.

25 Q Did he use this address, to your

1 Allaham - ATTORNEYS' EYES ONLY
2 knowledge, for your and his convenience so
3 that you could work on Qatar matters
4 together?

5 MS. YUSUF: Object to the form.

6 A We had no agreement. I have no
7 agreement with Stonington.

8 Q Did he pay you rent for the use
9 of this address?

10 A What date was this filed?

11 Q It was filed in November of
12 2017.

13 MS. YUSUF: Objection. That's
14 misstated. This says it was September
15 3, 2017.

16 Q Sorry. September 2017.

17 A I don't think I was in business
18 at that time.

19 Q Do you know where Mr. Muzin
20 lives?

21 A Somewhere in DC.

22 Q Have you been to his house?

23 A Yes.

24 Q Do you know if he lives in
25 Maryland or DC?

1 Allaham - ATTORNEYS' EYES ONLY

2 A I'm not sure. I'm not very
3 familiar with it.

4 Q Have you used his offices in the
5 same manner as he has used your business
6 addresses?

7 A No.

8 Q Do you know if Stonington
9 maintains any bank accounts?

10 A I don't know.

11 Q But you did, from time to time,
12 engage in financial transactions with
13 Stonington or Mr. Muzin, correct?

14 MS. YUSUF: Objection.

15 A No.

16 Q You did at various times engage
17 in financial transactions with entities
18 controlled by Mr. Muzin, correct?

19 A Yes.

20 Q And do you recall what banks he
21 used for those transactions?

22 A No, I don't.

23 Q Do you know what Stonington's
24 main phone number is?

25 A No.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q When you needed to speak with
3 Nick Muzin, did you use his cell phone
4 number exclusively, or were there other
5 numbers, such as an office number, that
6 you used for Stonington?

7 A His cell phone only.

8 Q Has Stonington done work for the
9 State of Qatar?

10 A That is what I'm saying; I
11 believe it didn't.

12 Q You're not aware of any work
13 that Stonington did for the State of Qatar
14 except for its public filings?


15 A I'm not --

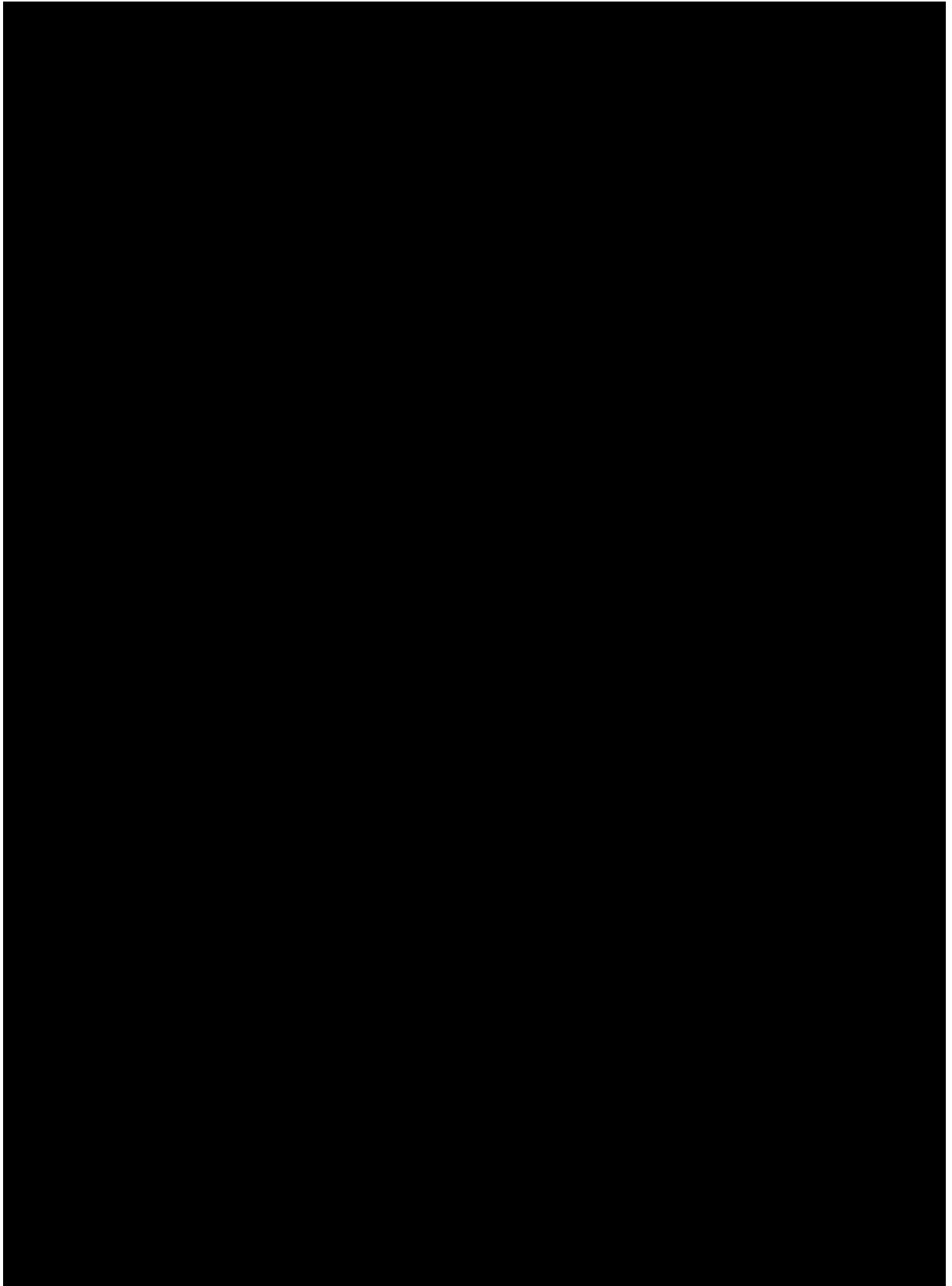
16 MR. GIMBEL: Objection to form.

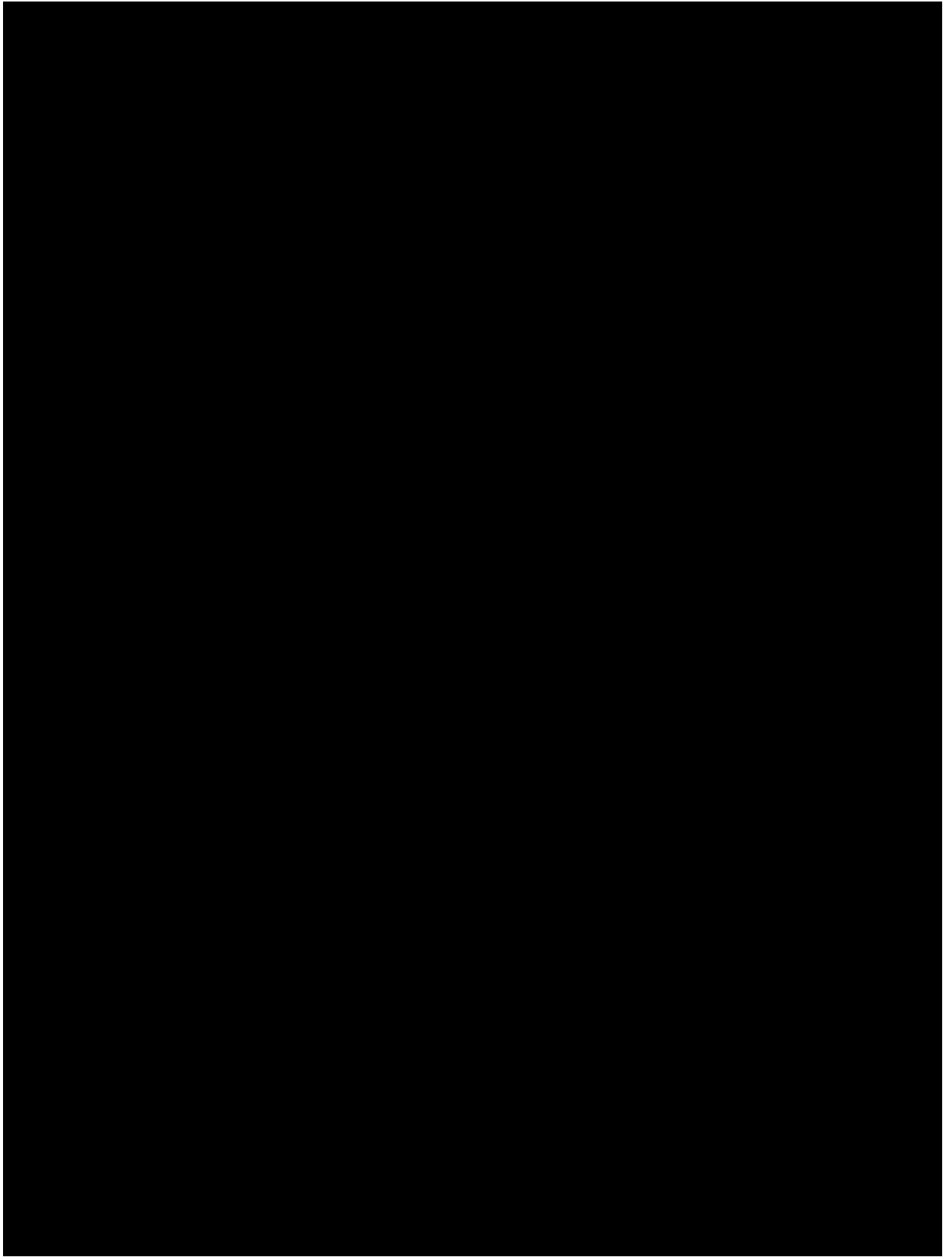
17 A I'm not answering for
18 Stonington. I have no -- nothing to do
19 with Stonington.

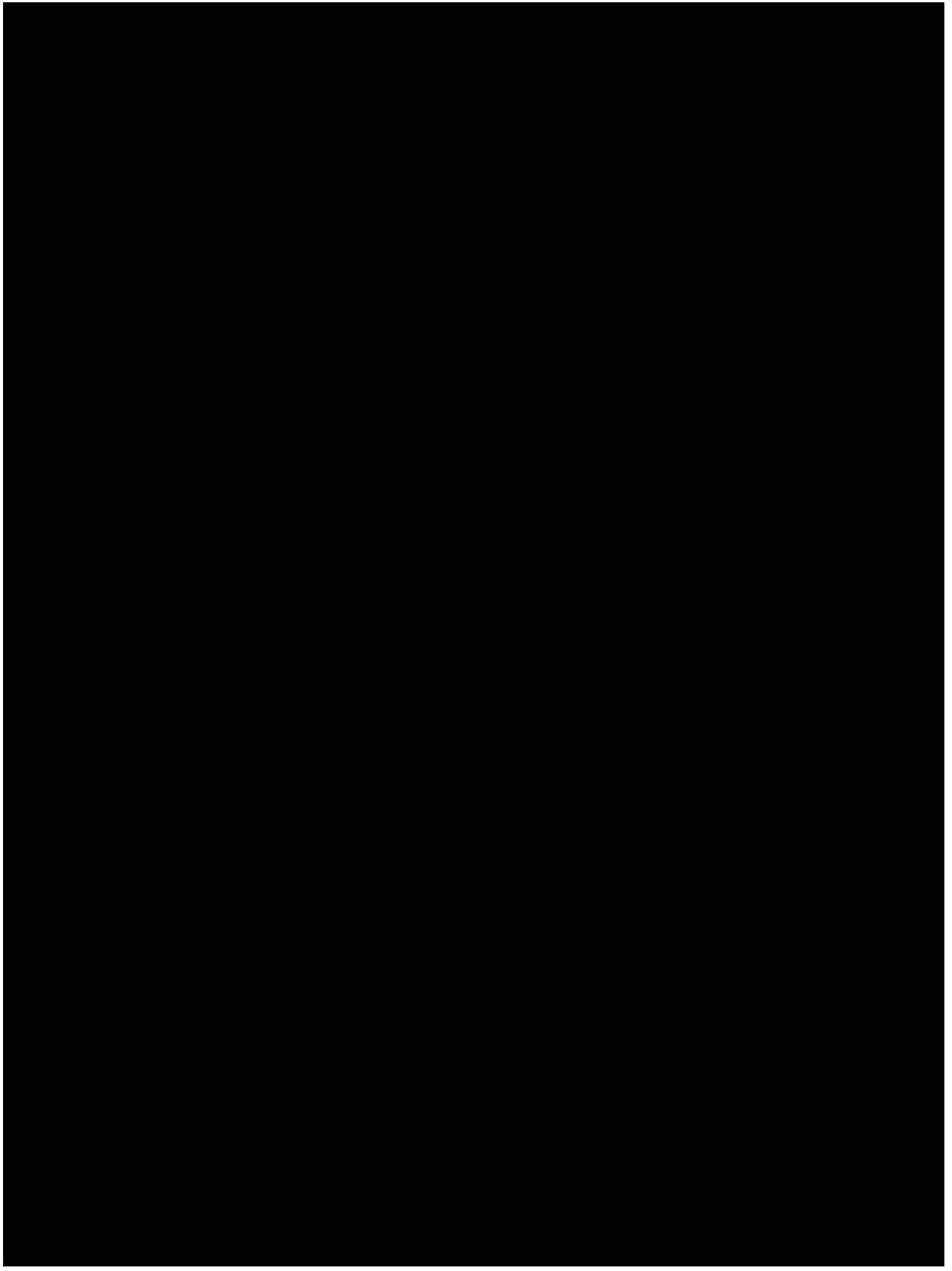
20 Q You have to answer the questions
21 that are posed to you to the best of your
22 knowledge.

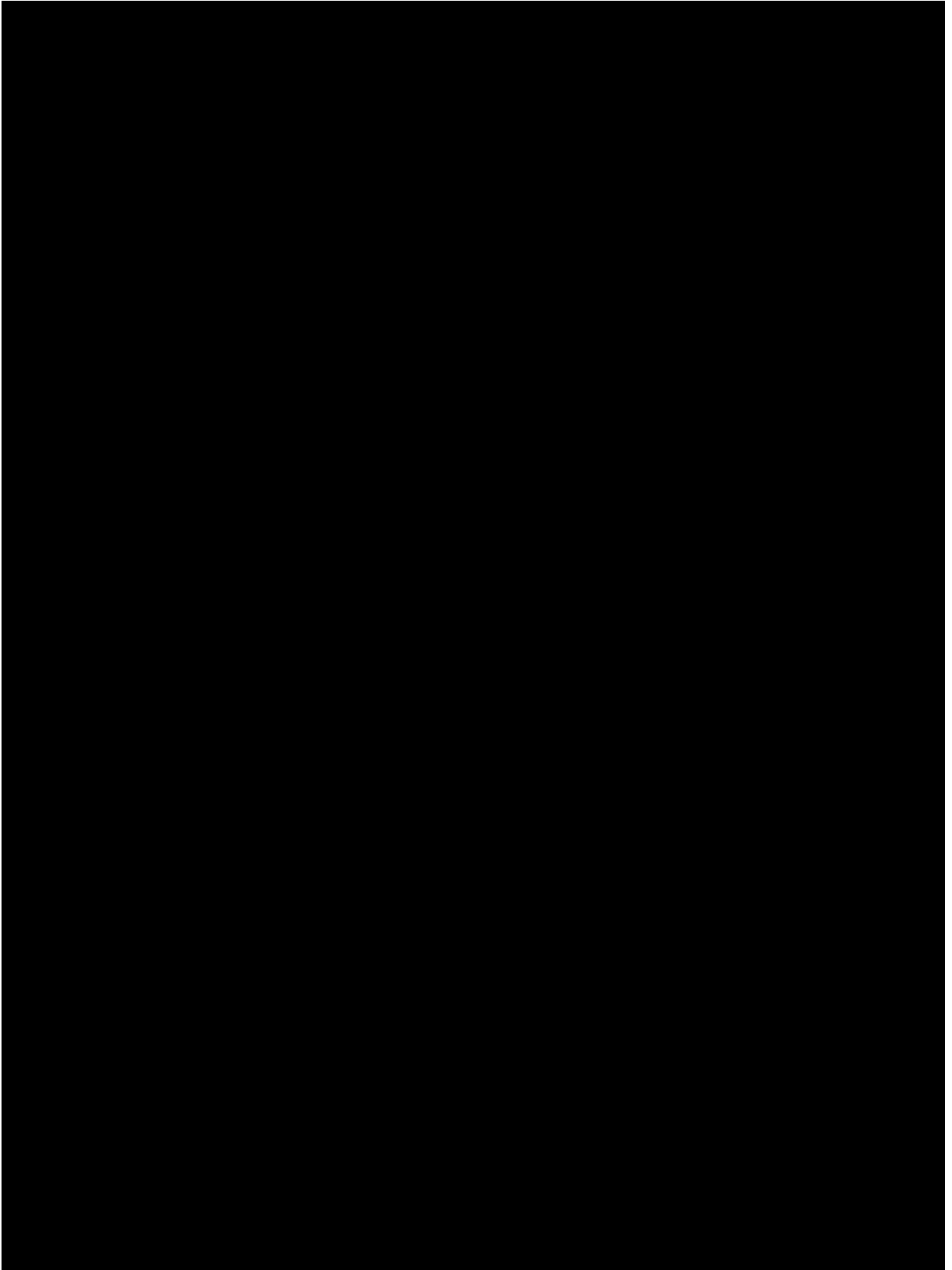
23 A So then can you re-ask it,
24 please.

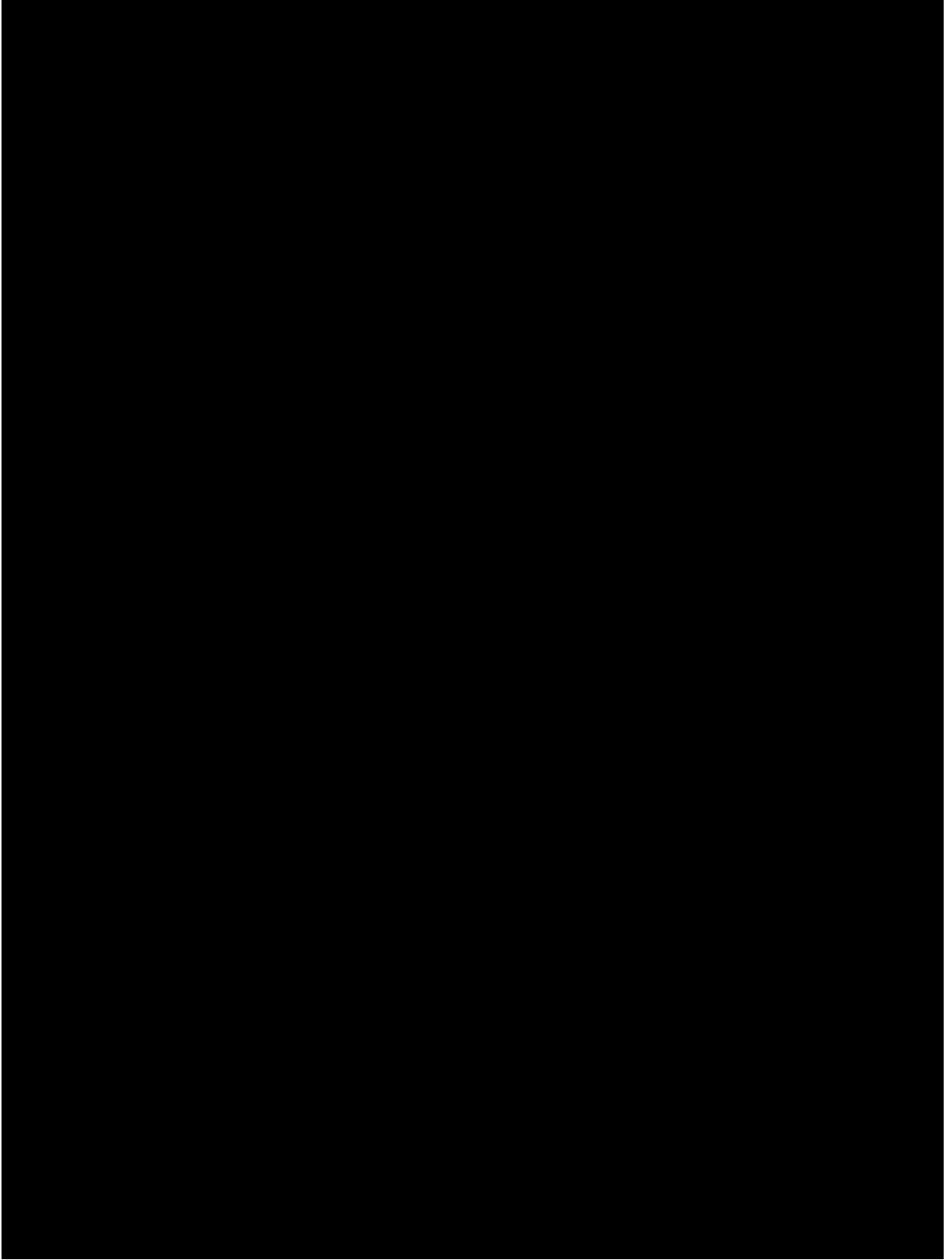


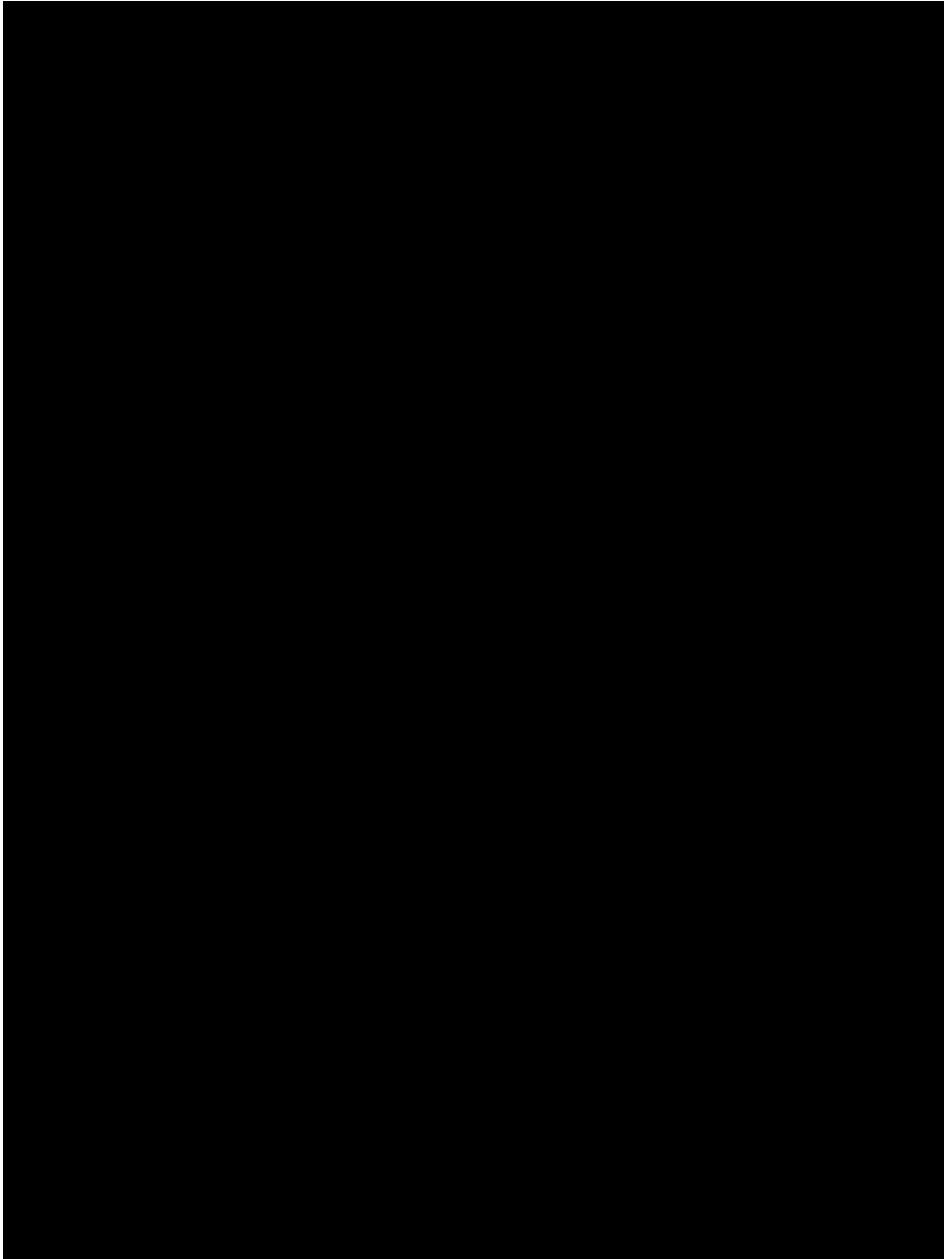


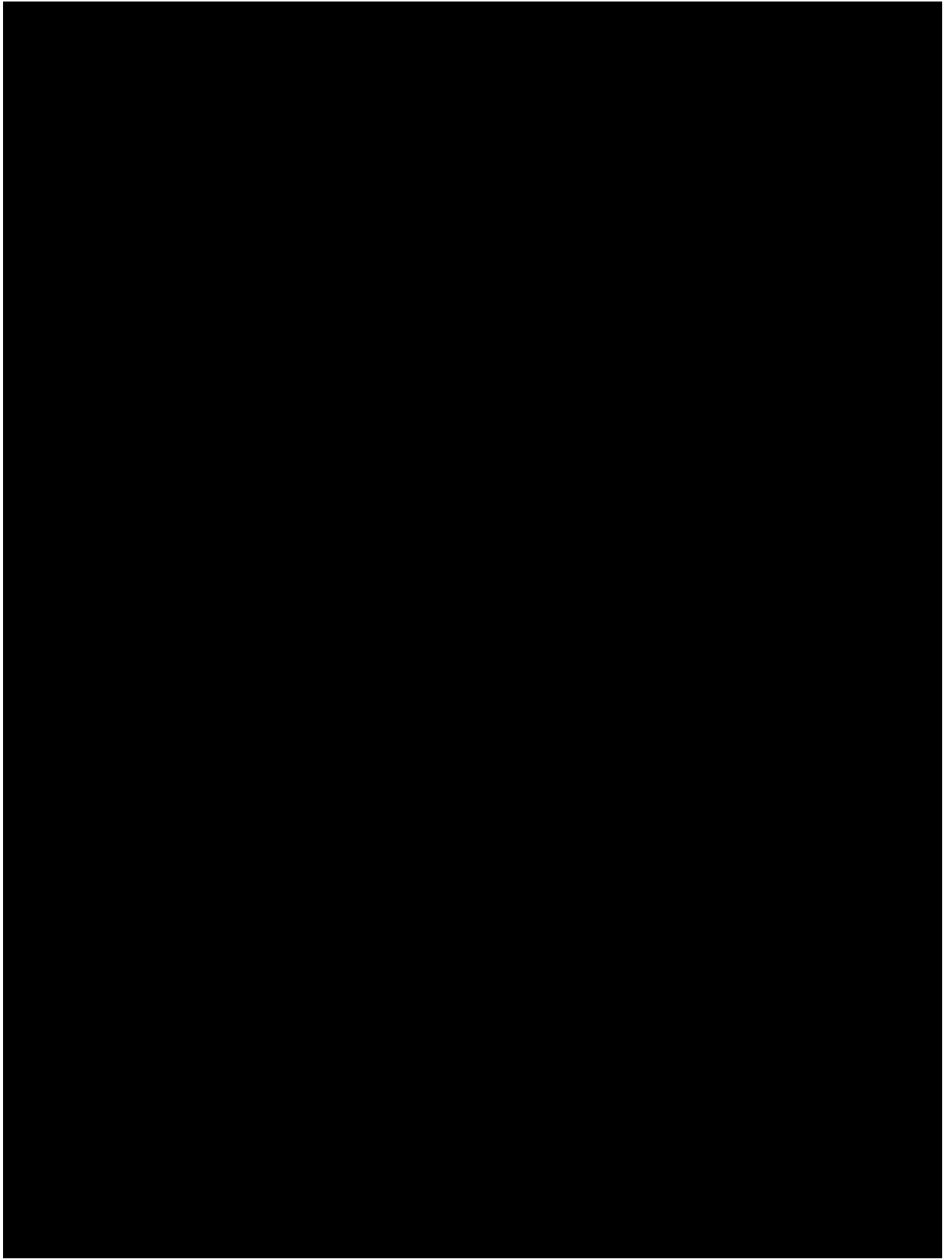


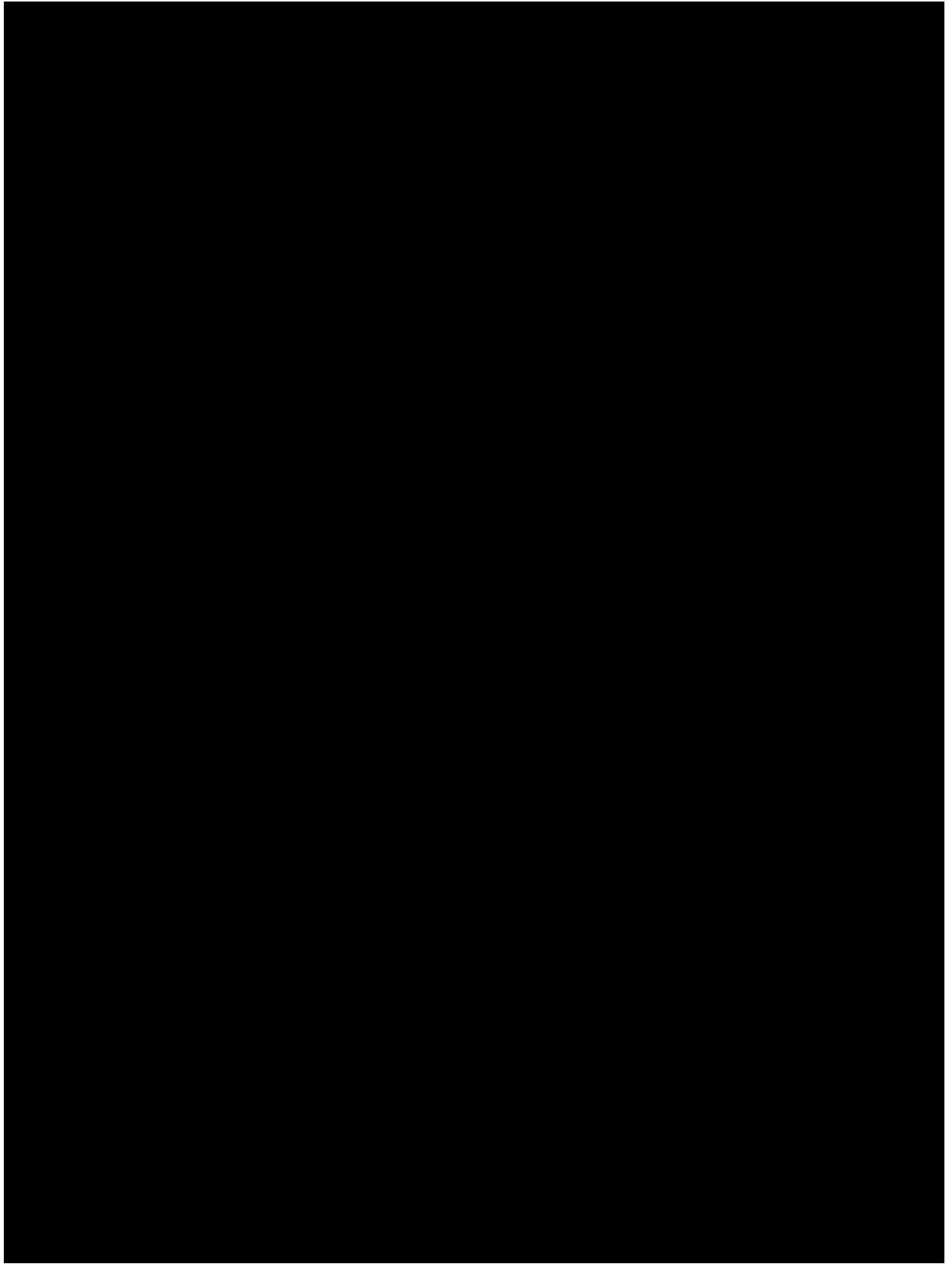


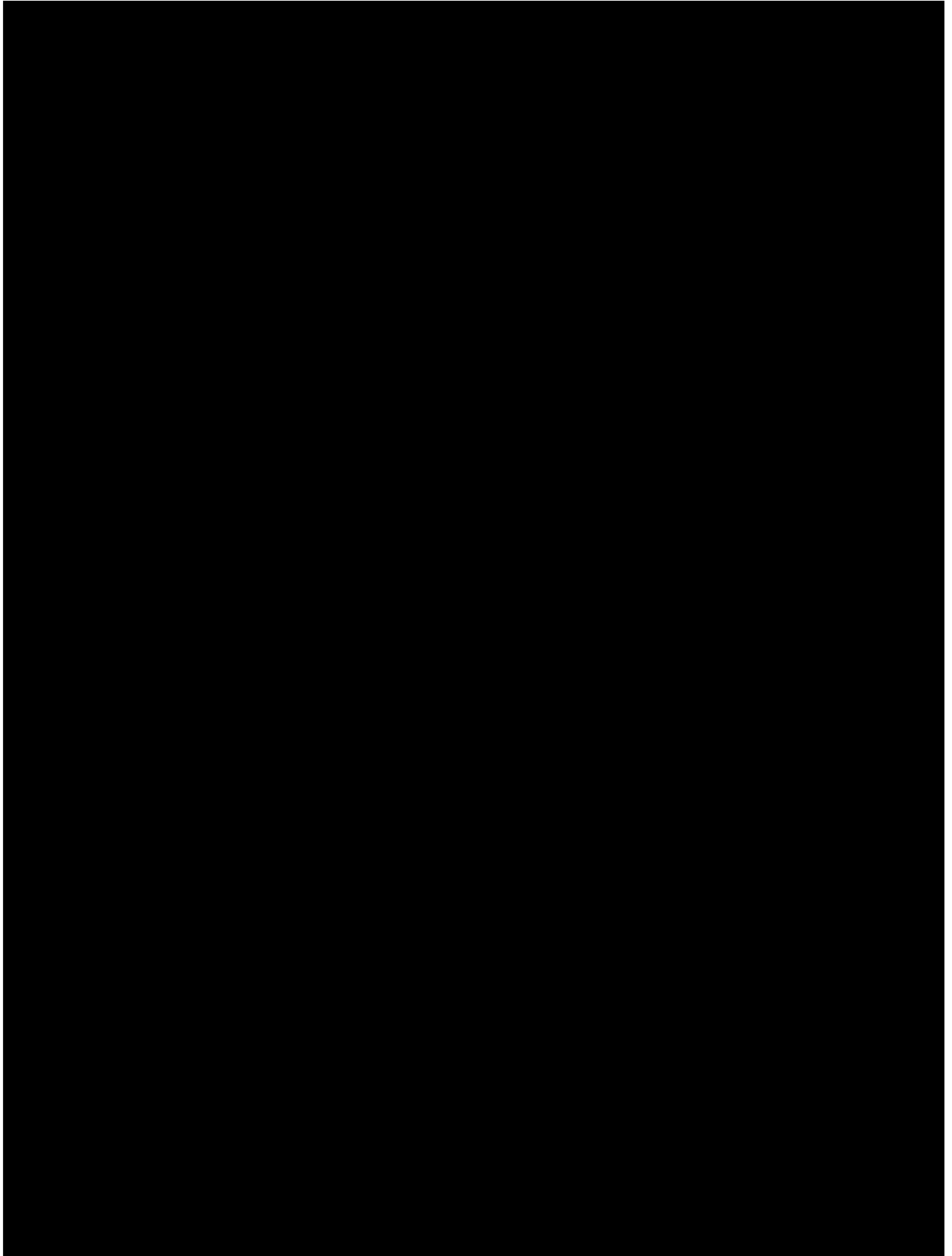


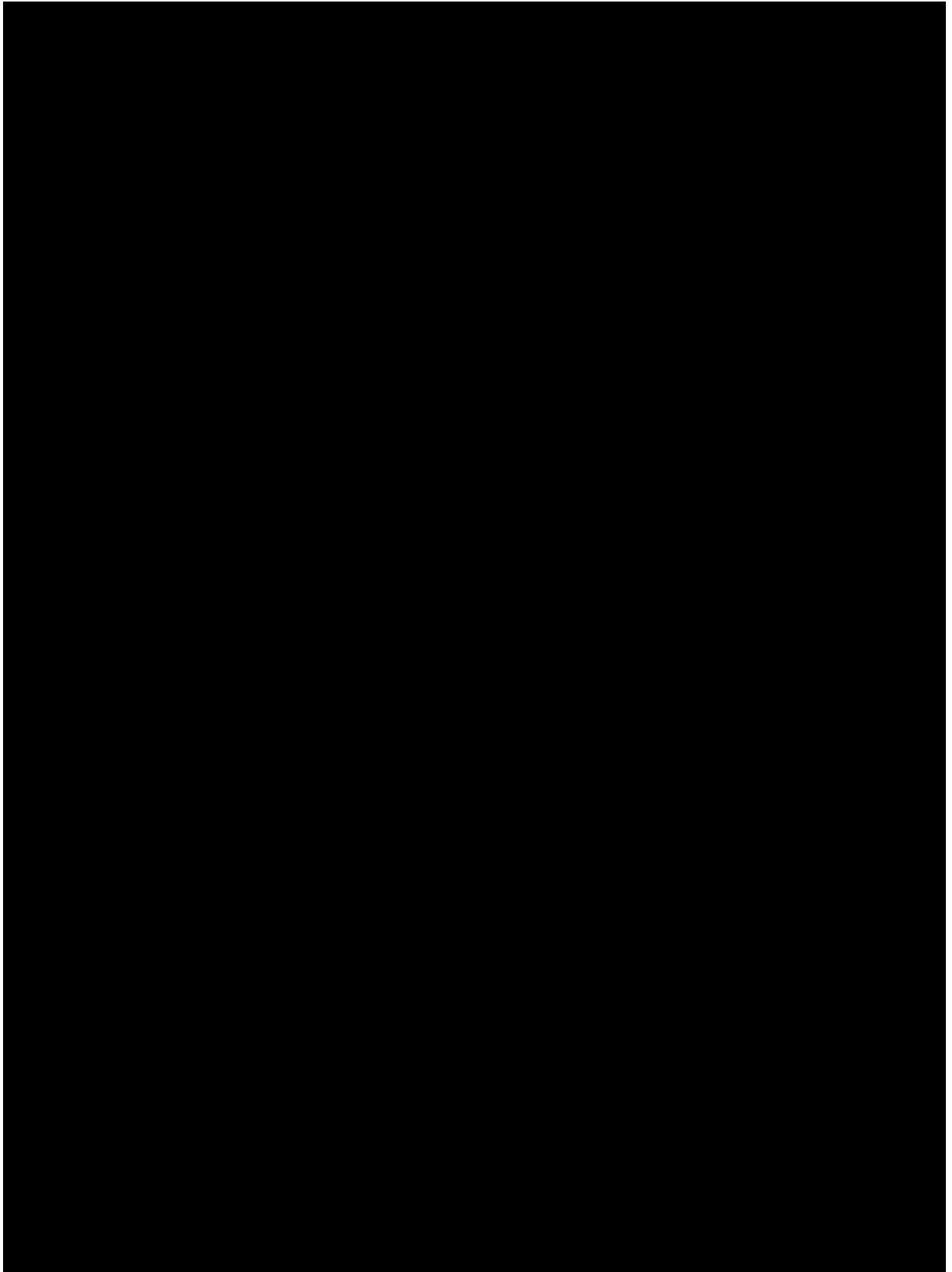


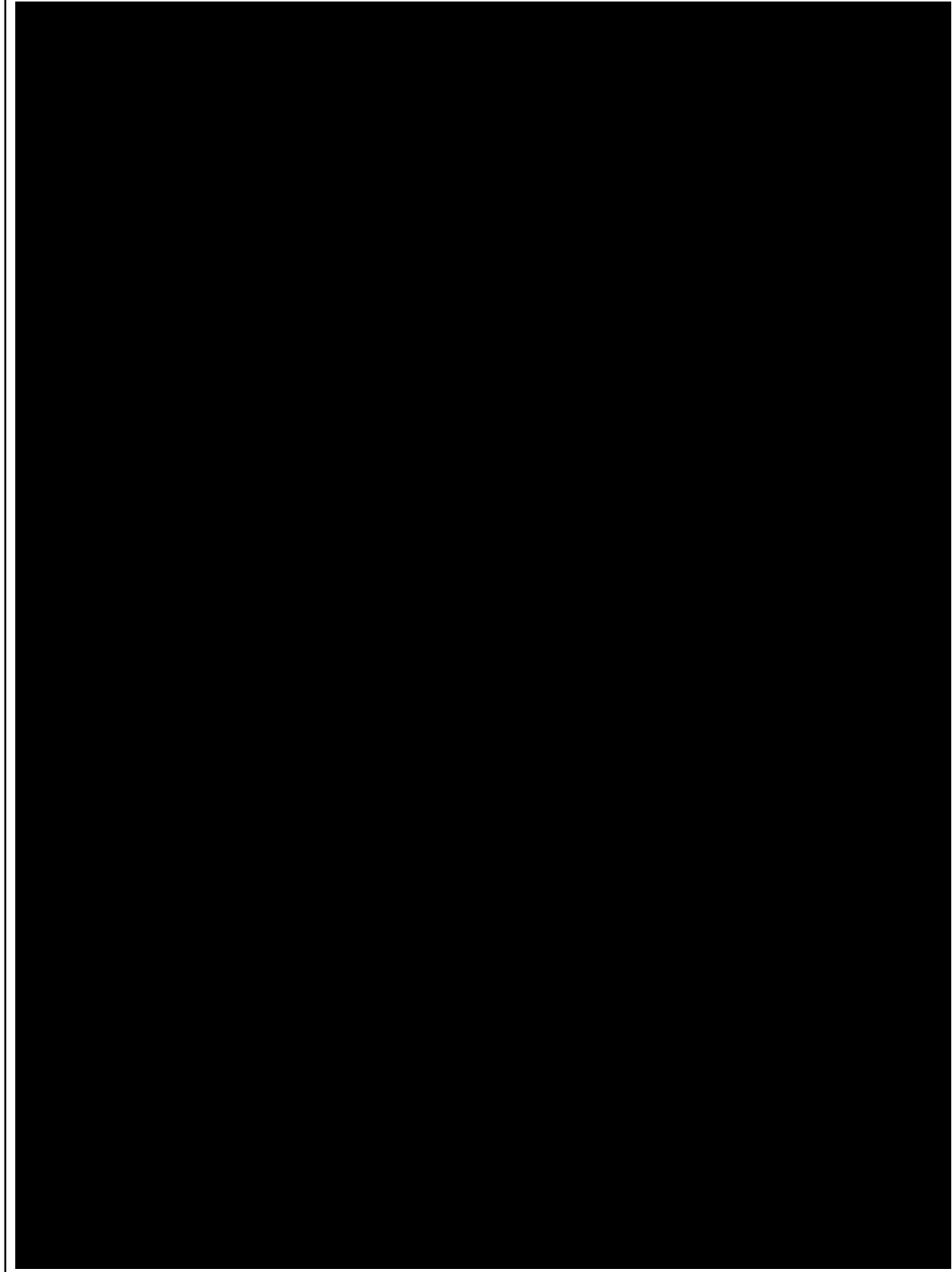


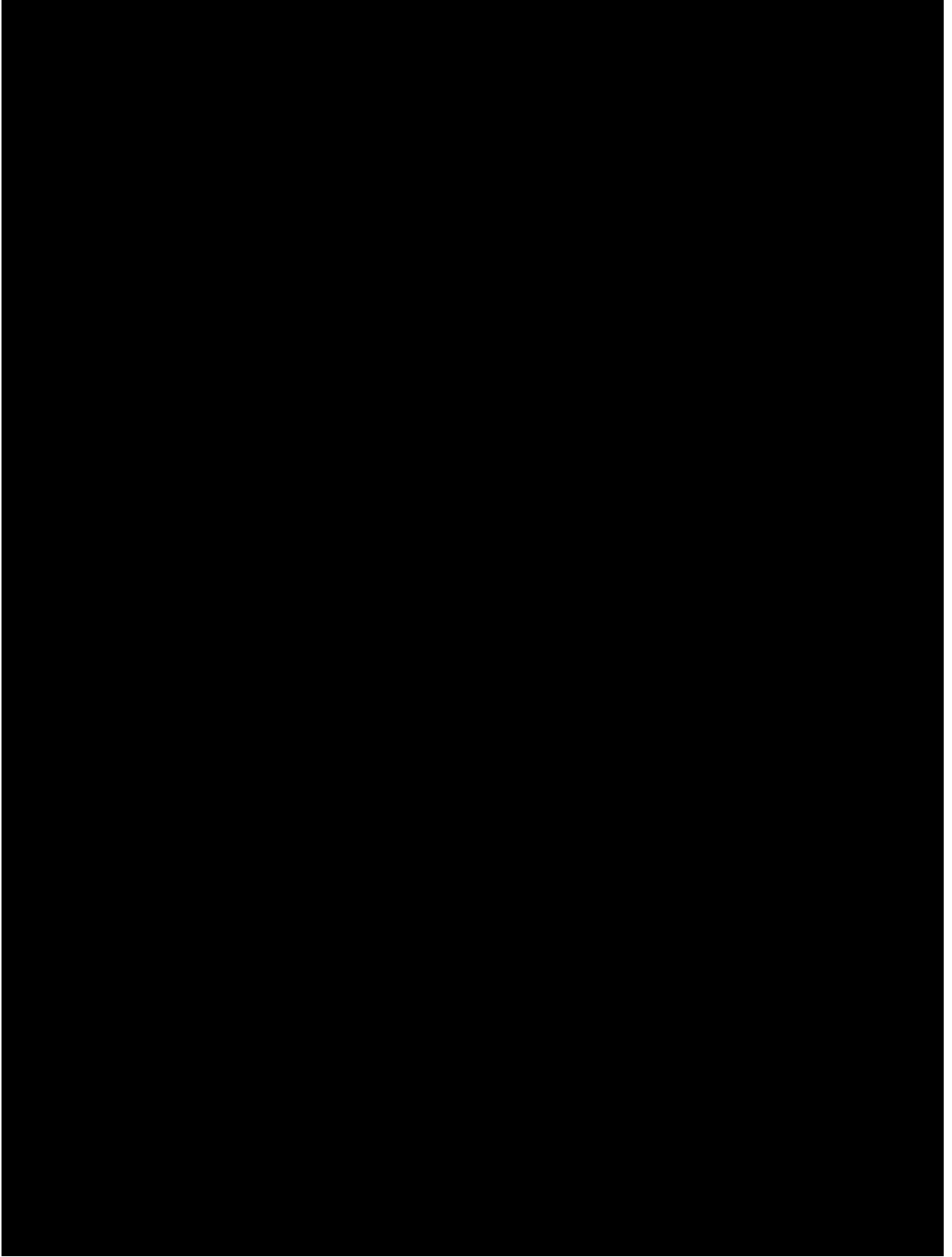


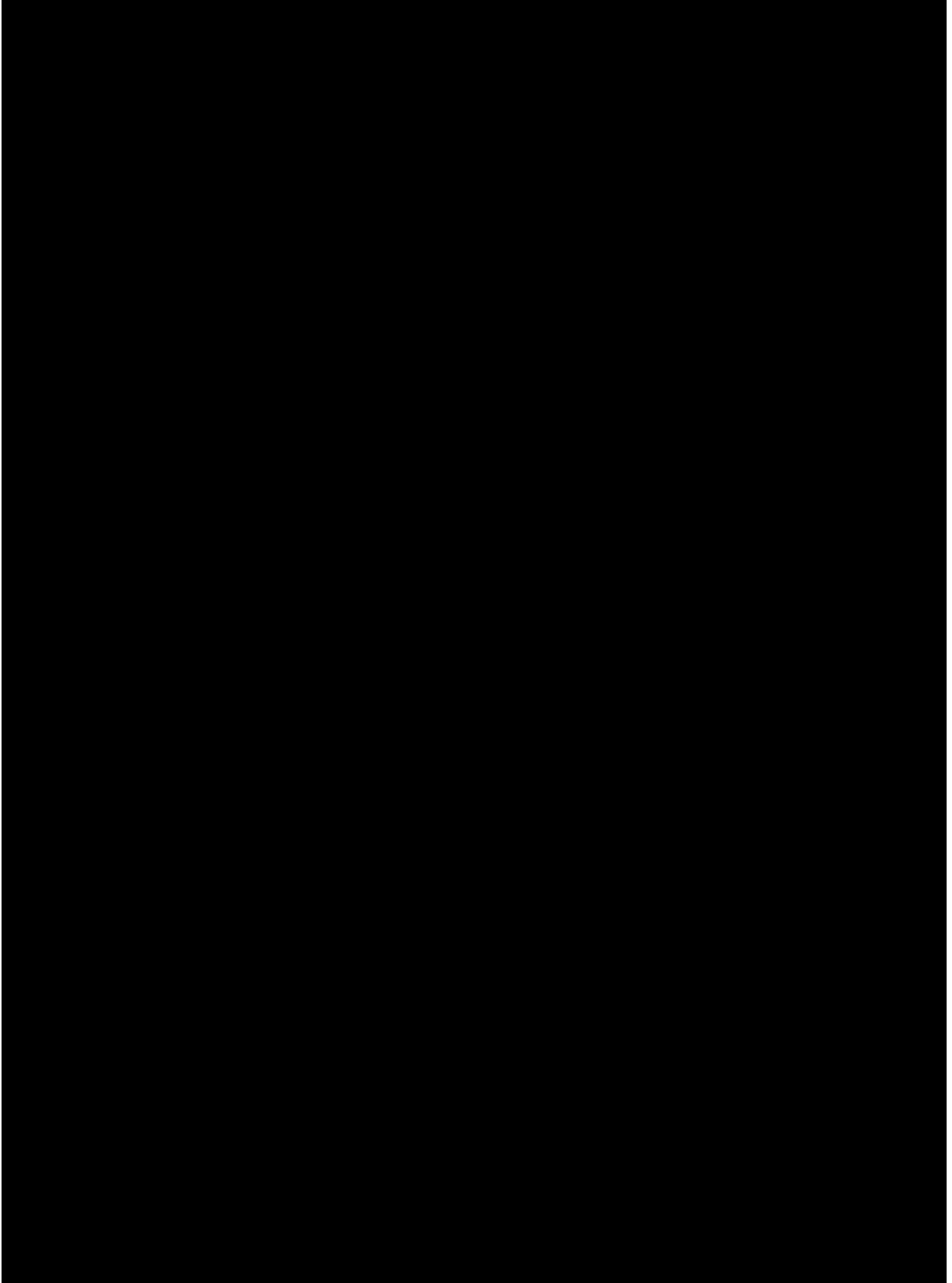


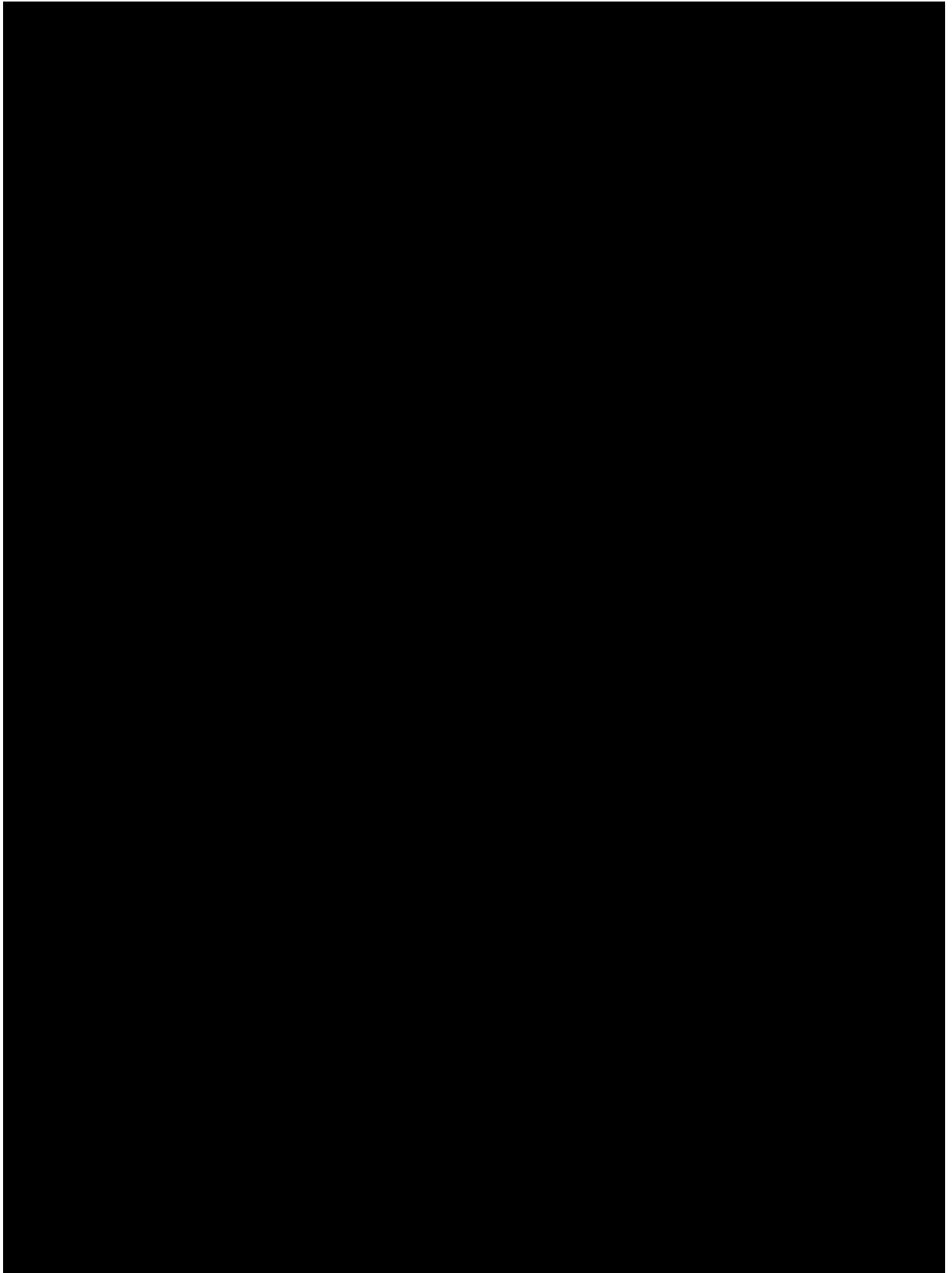


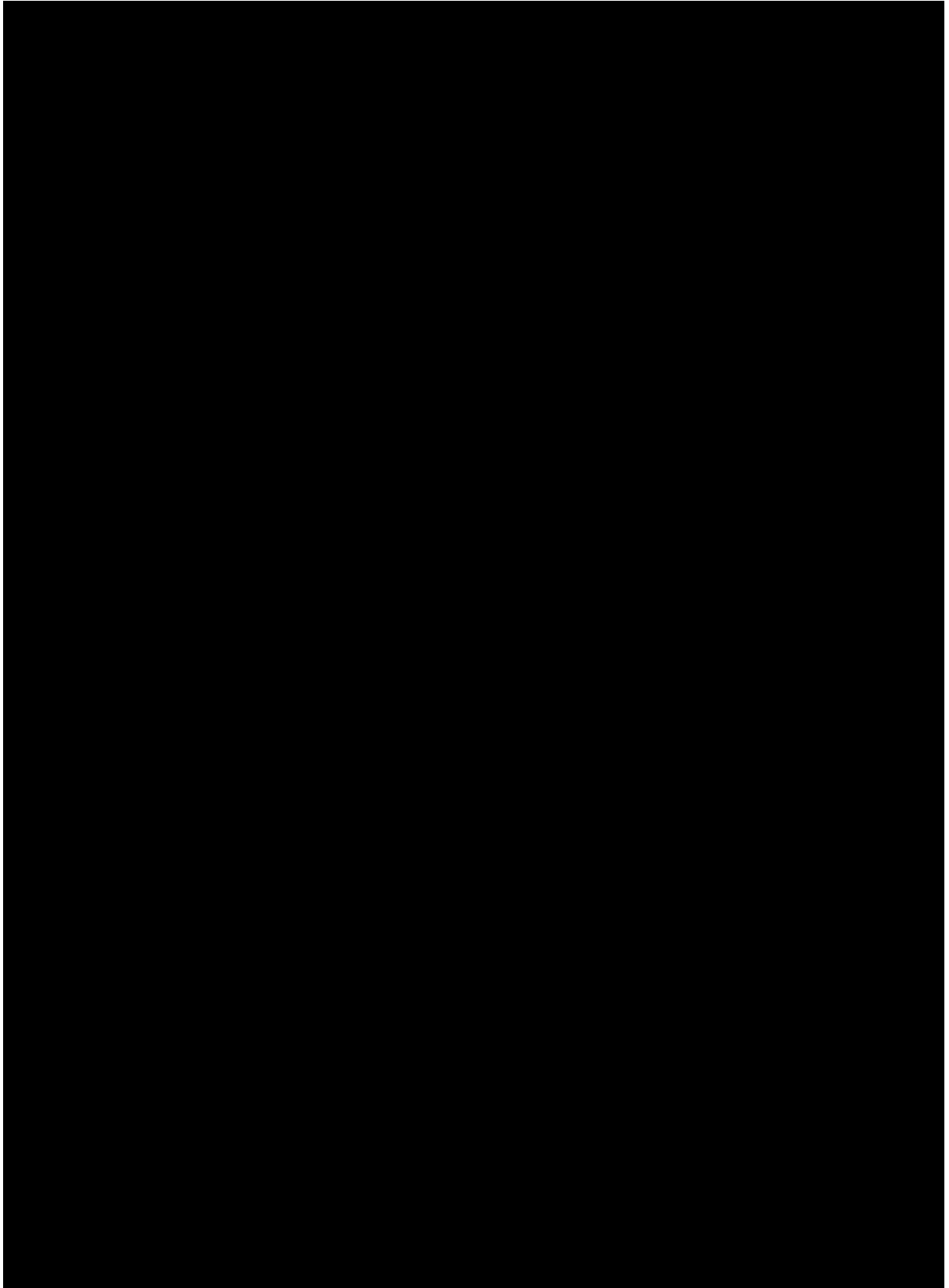


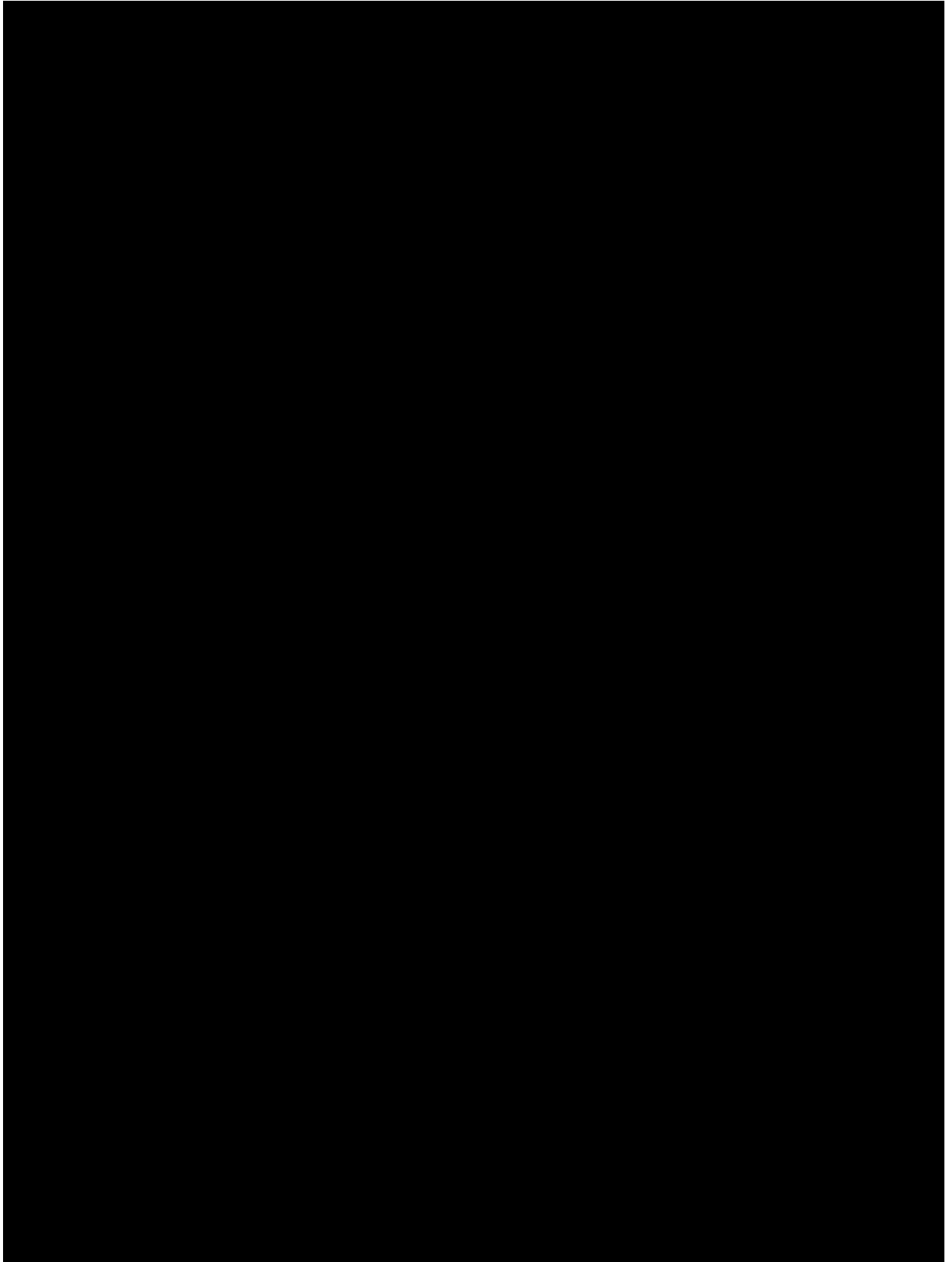


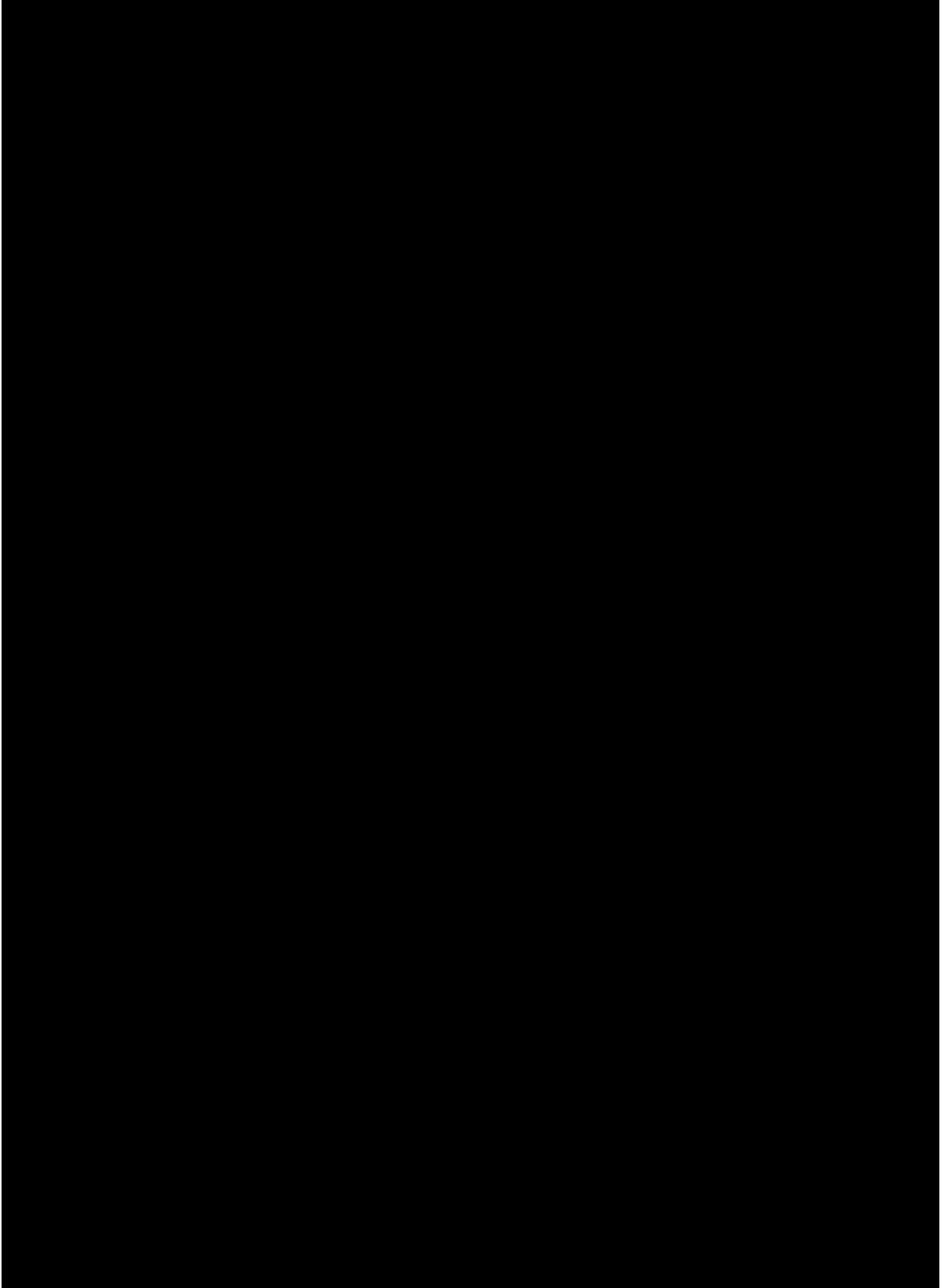


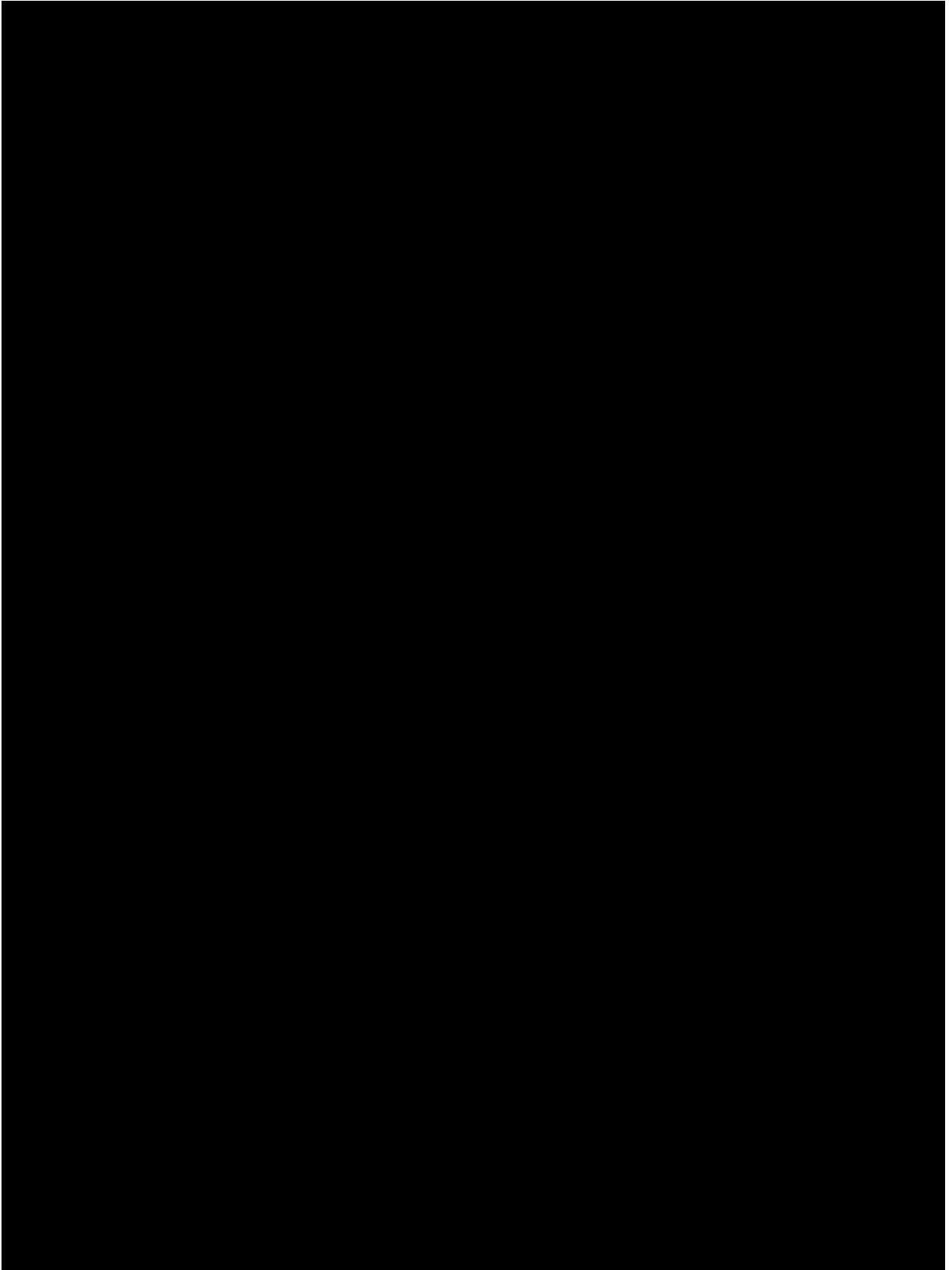


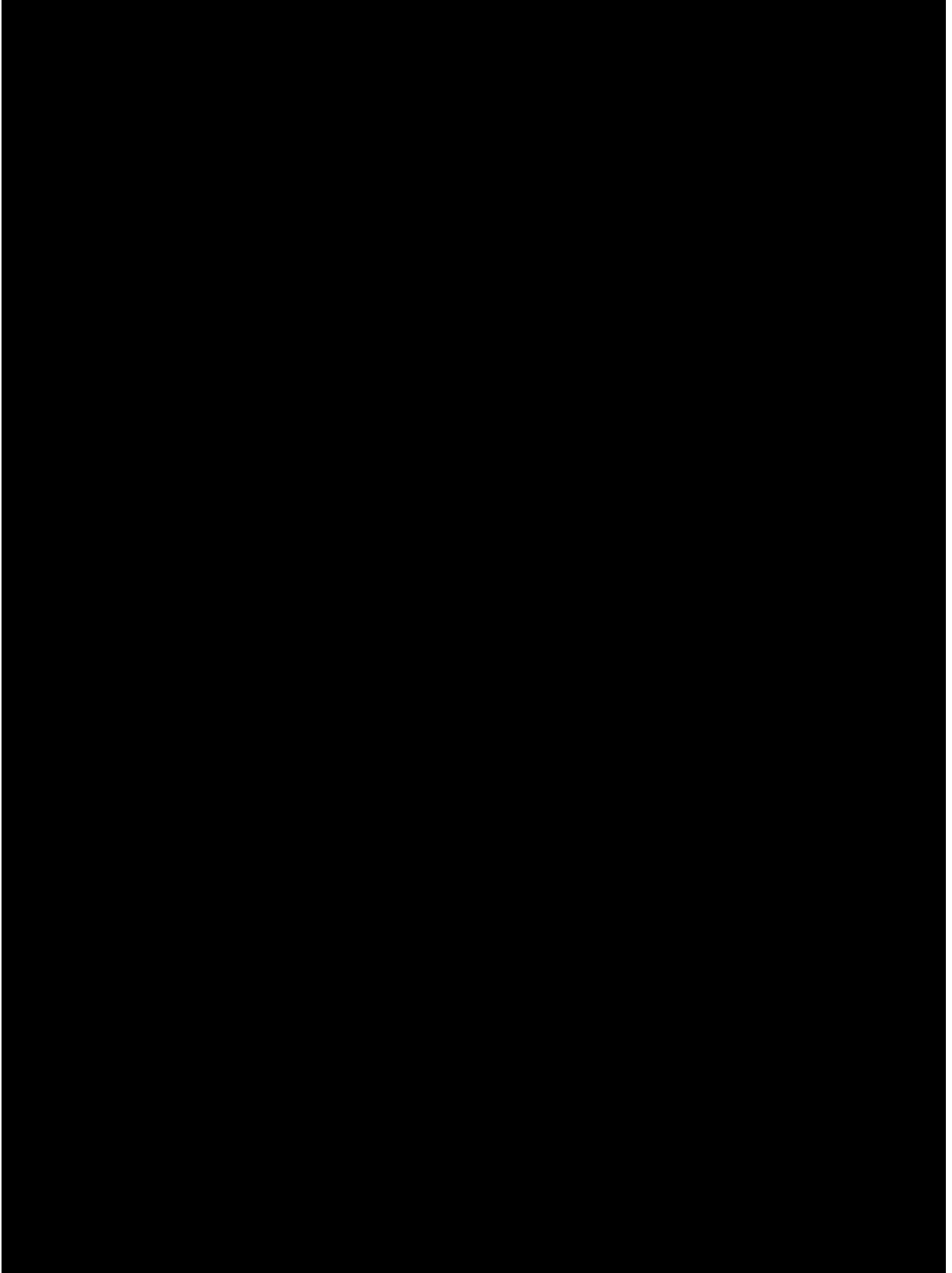


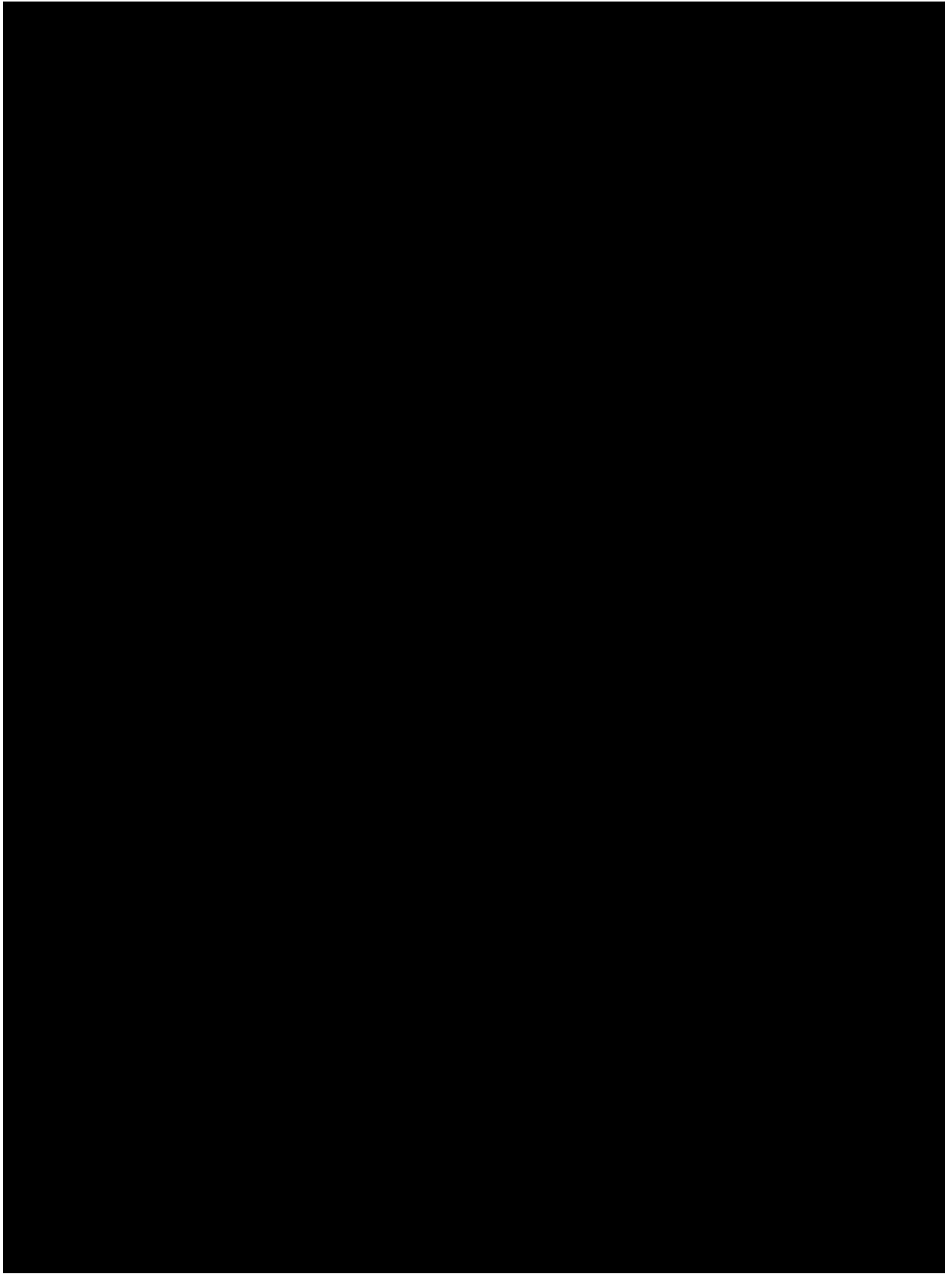


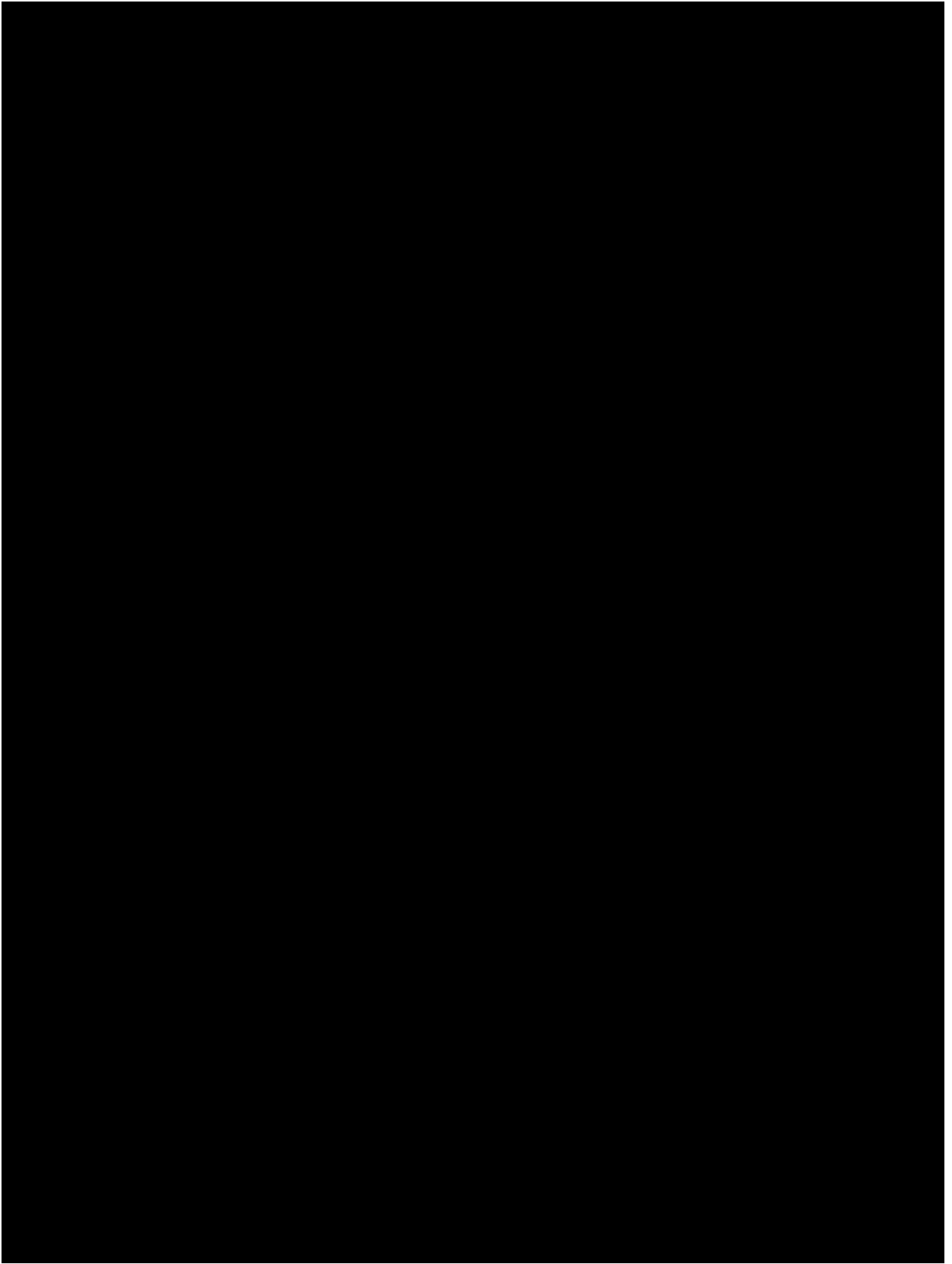


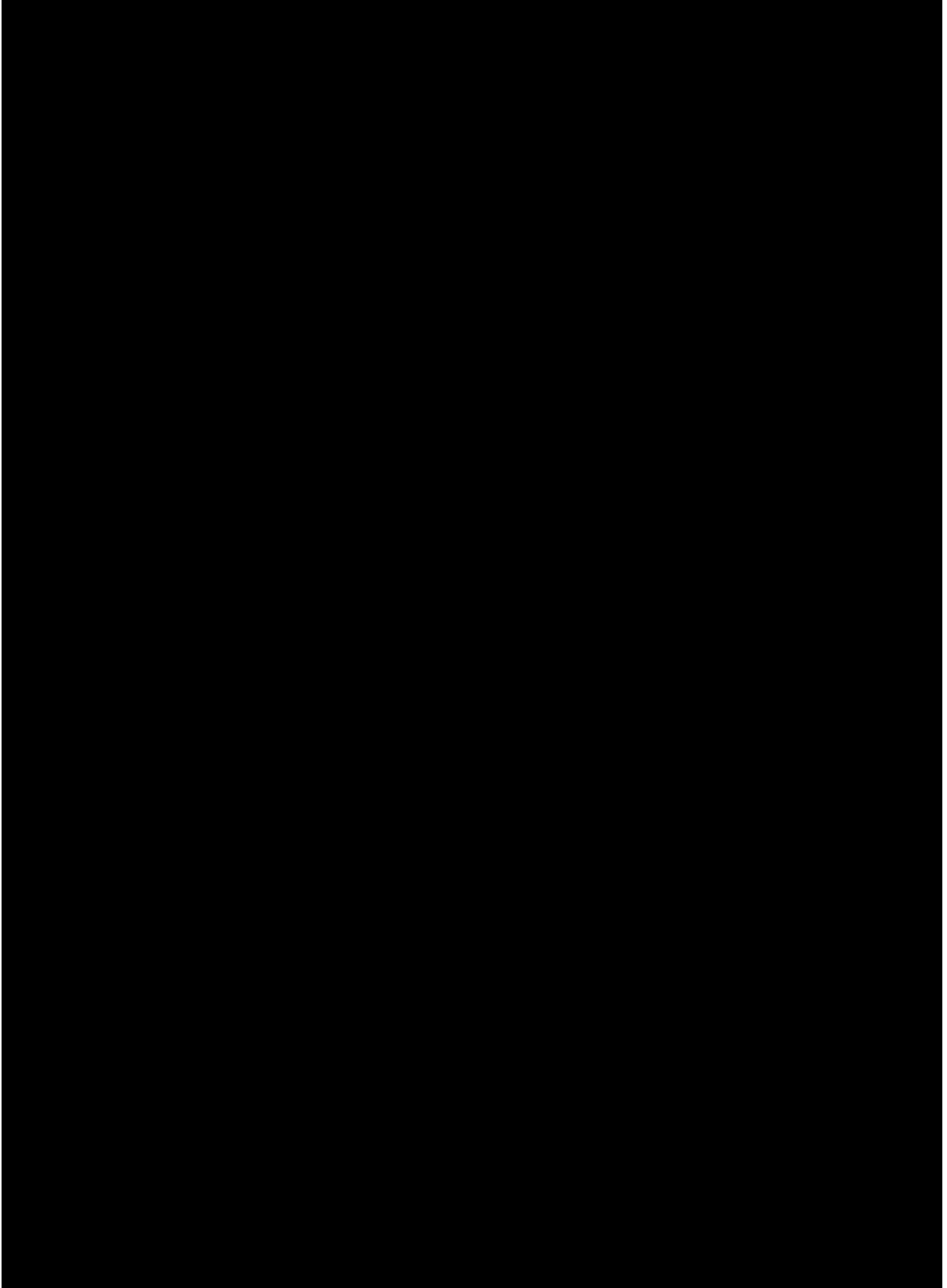


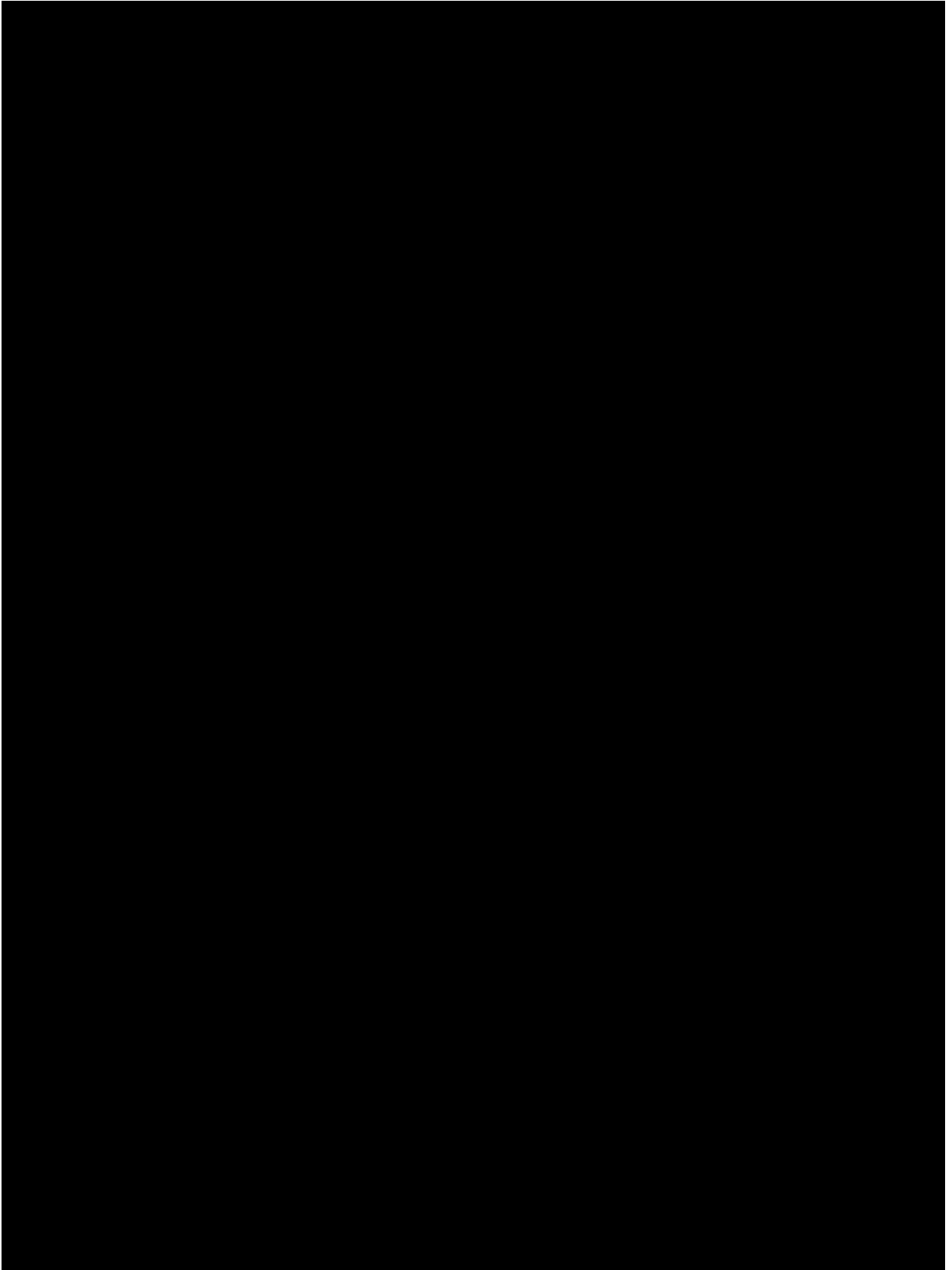


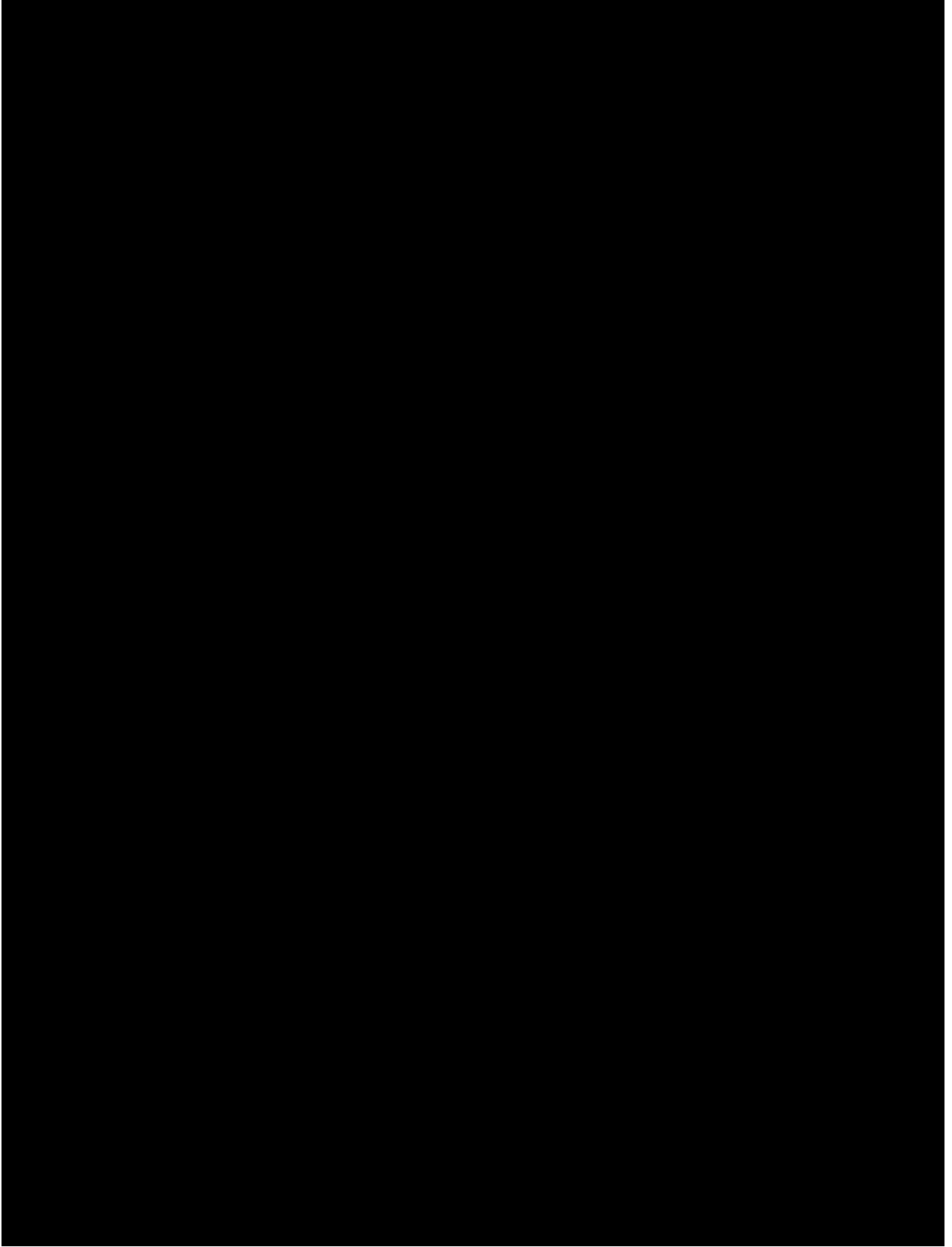


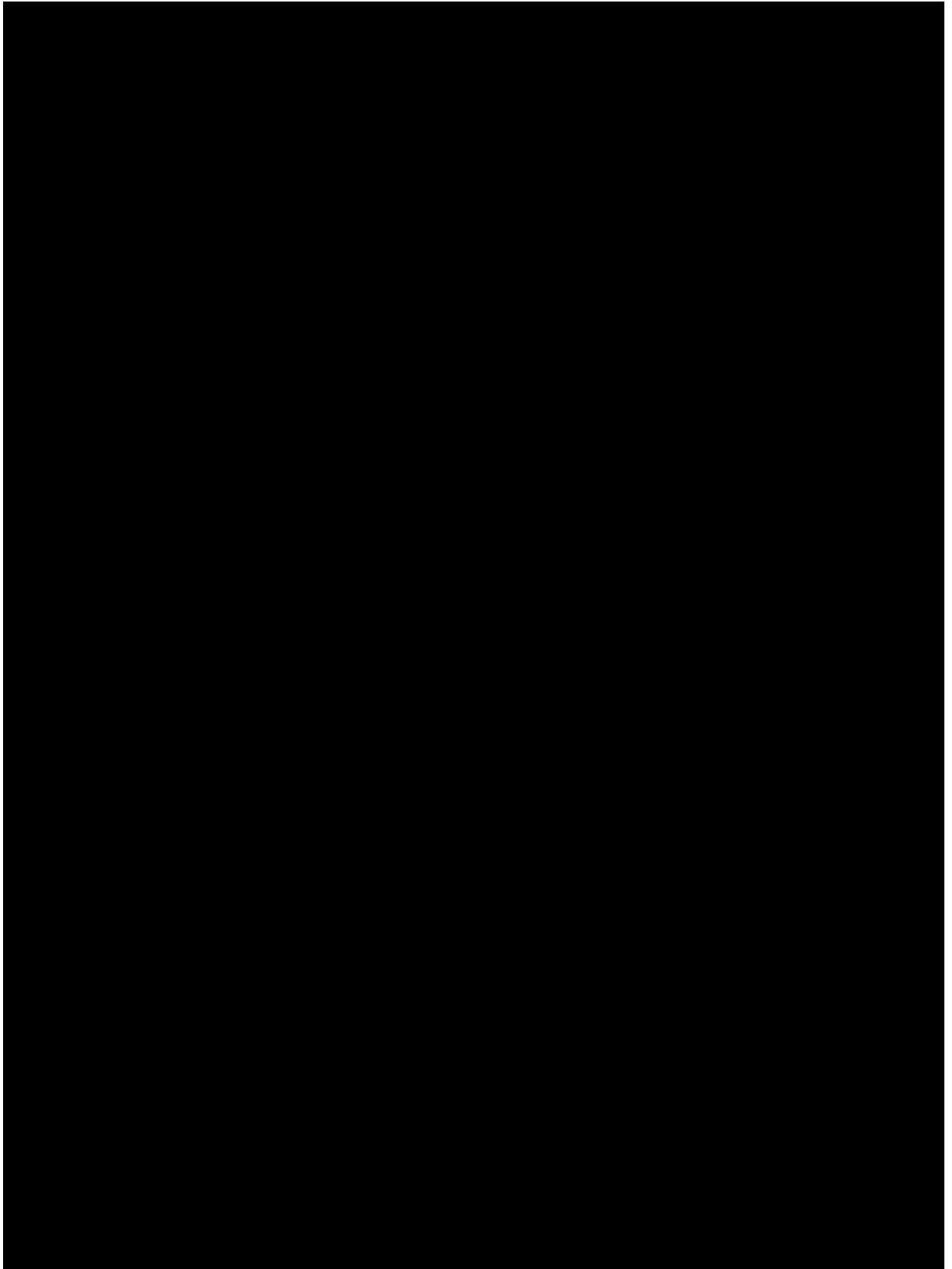


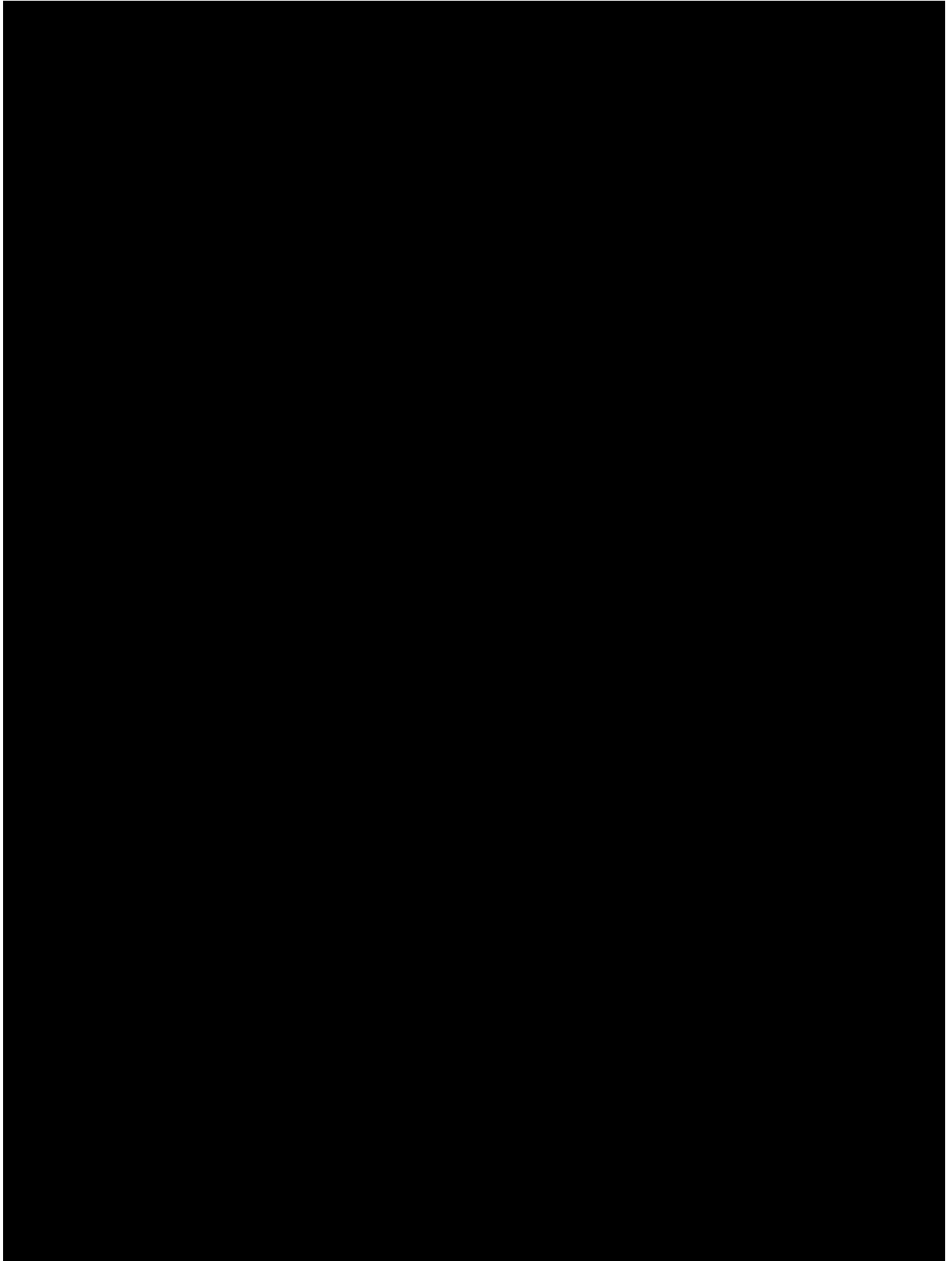


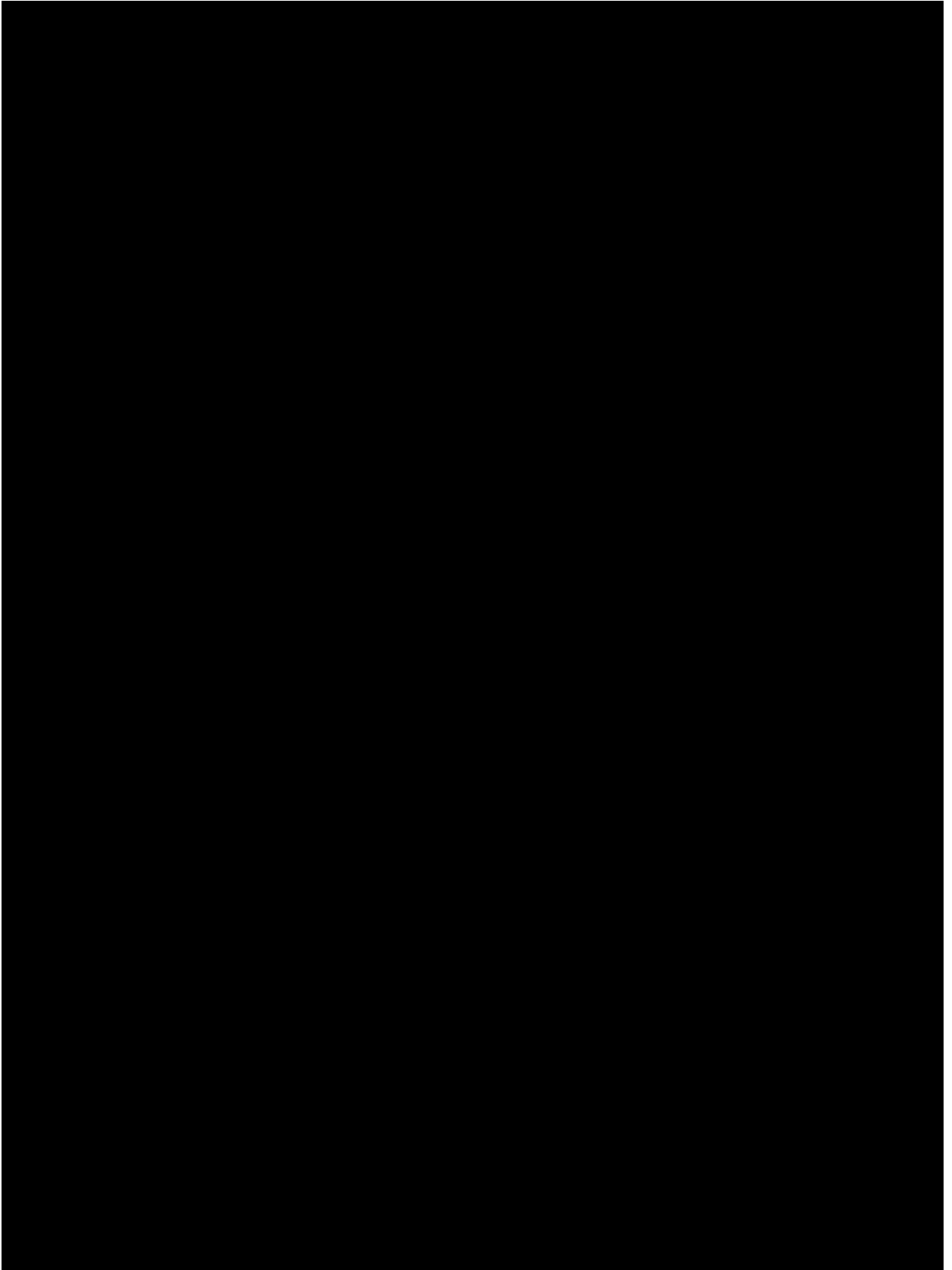


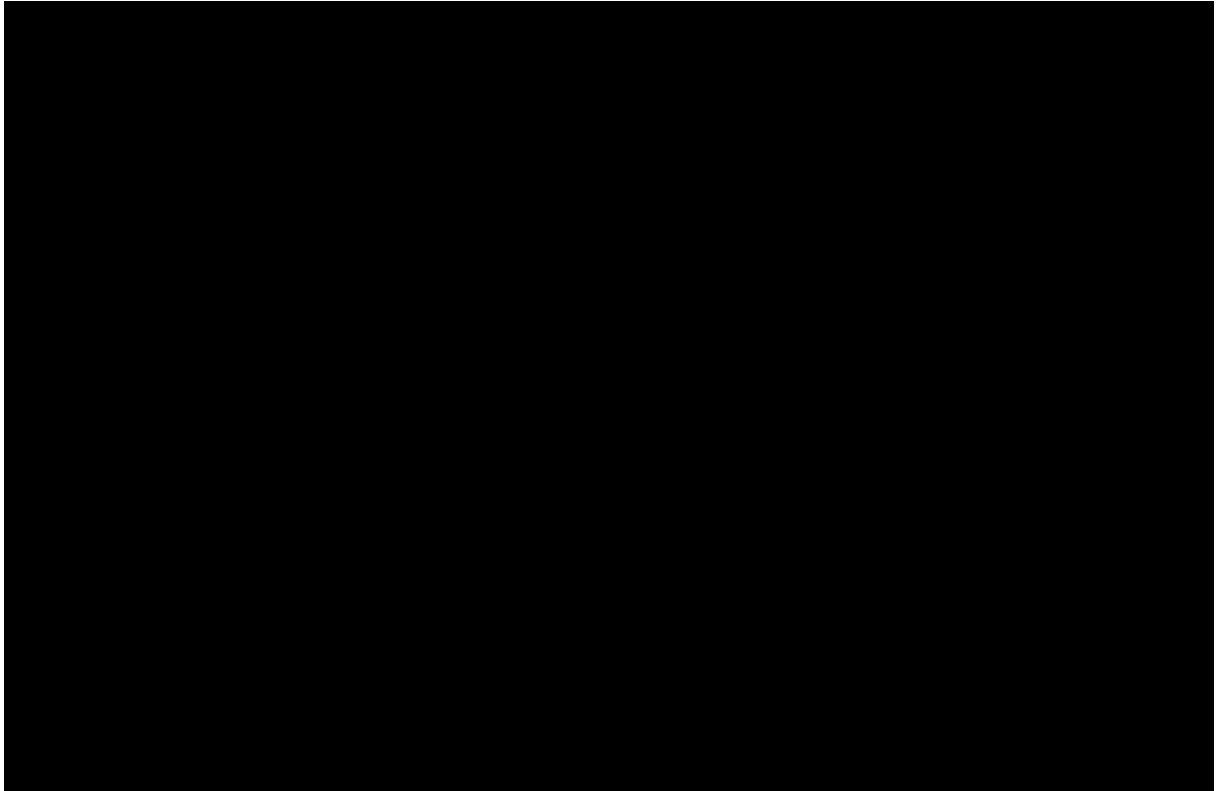




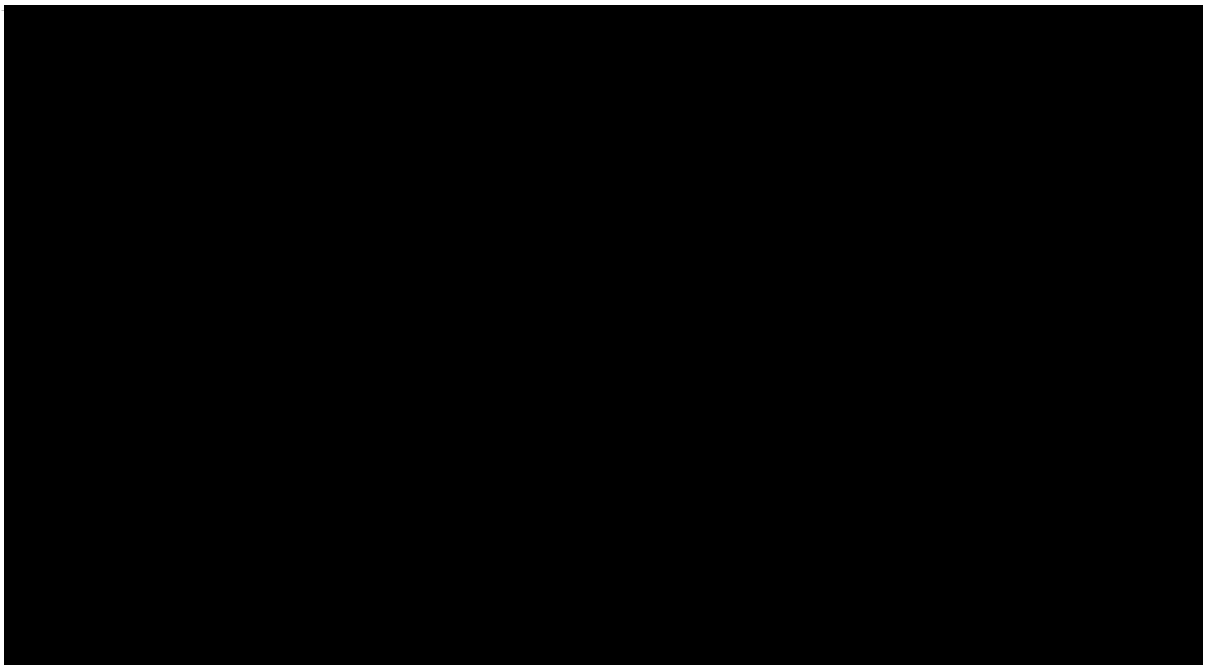


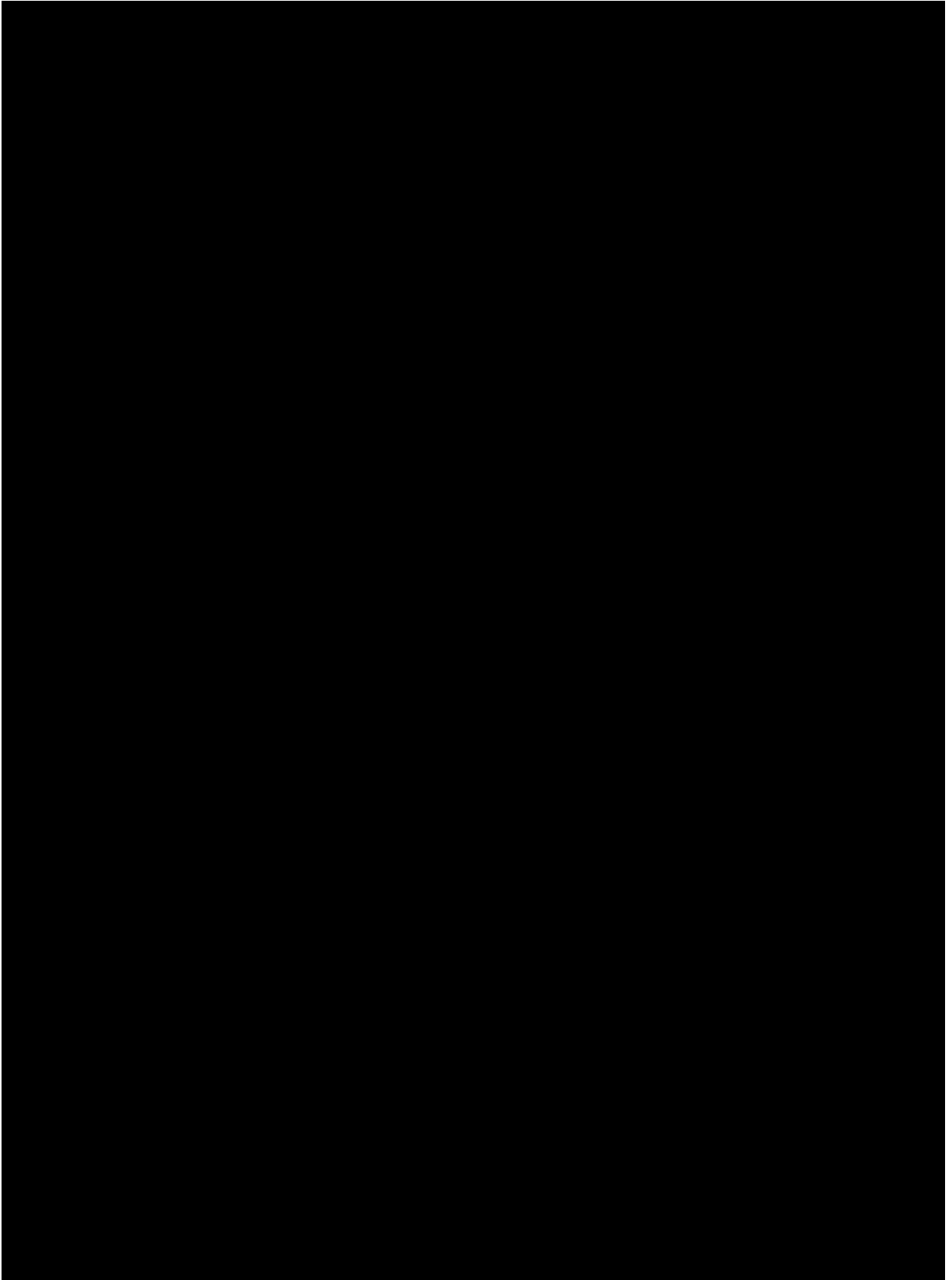


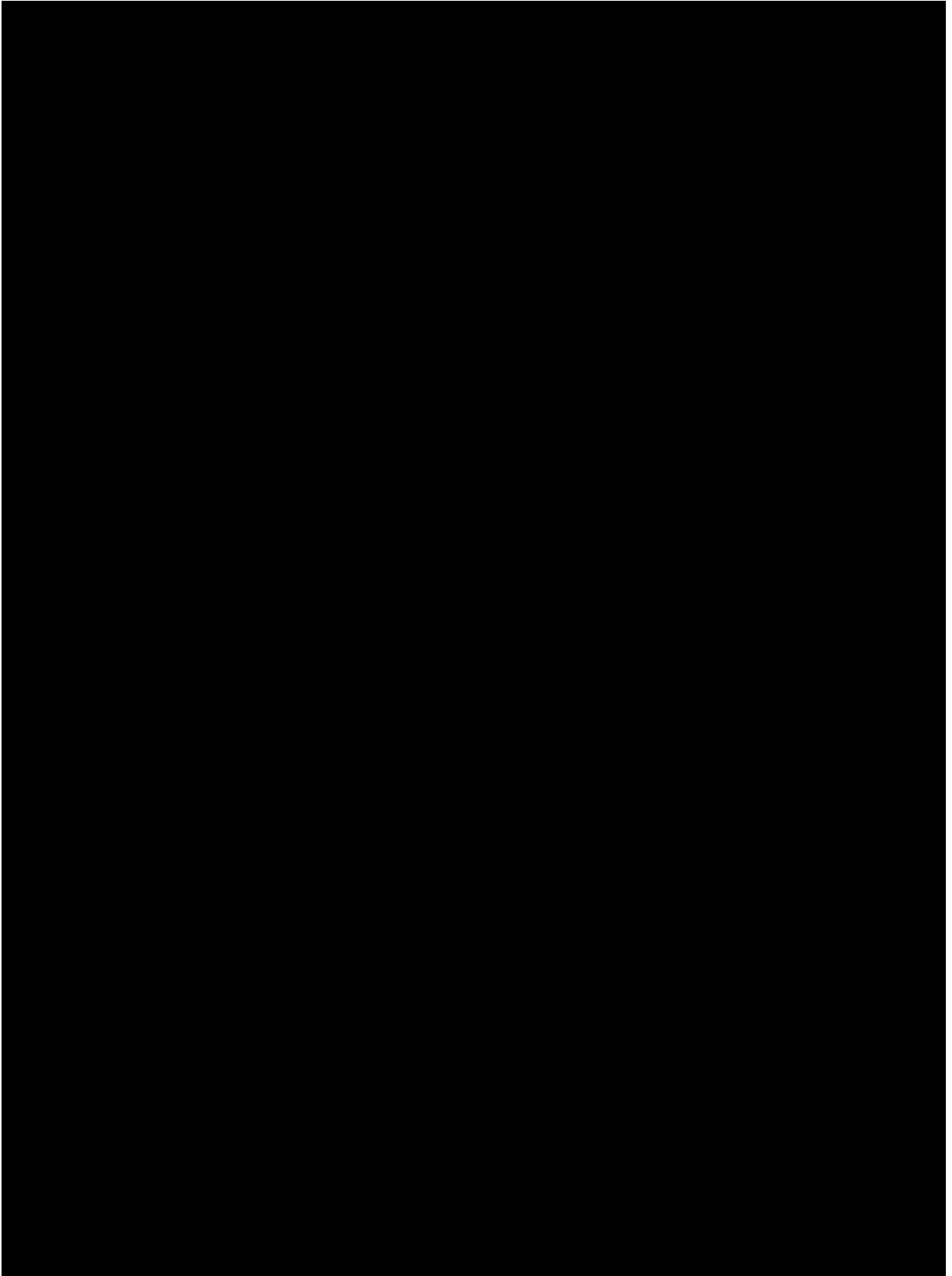


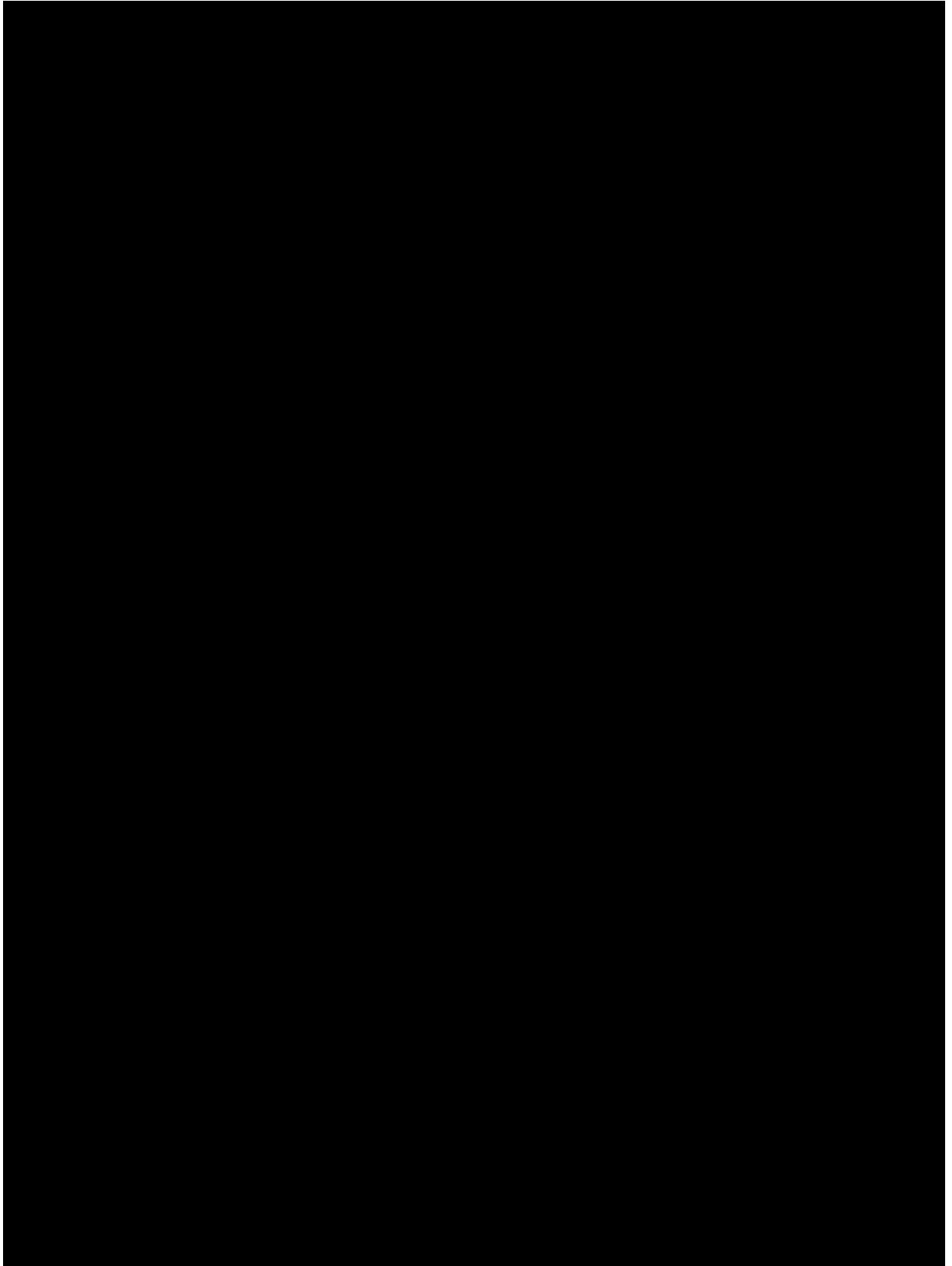


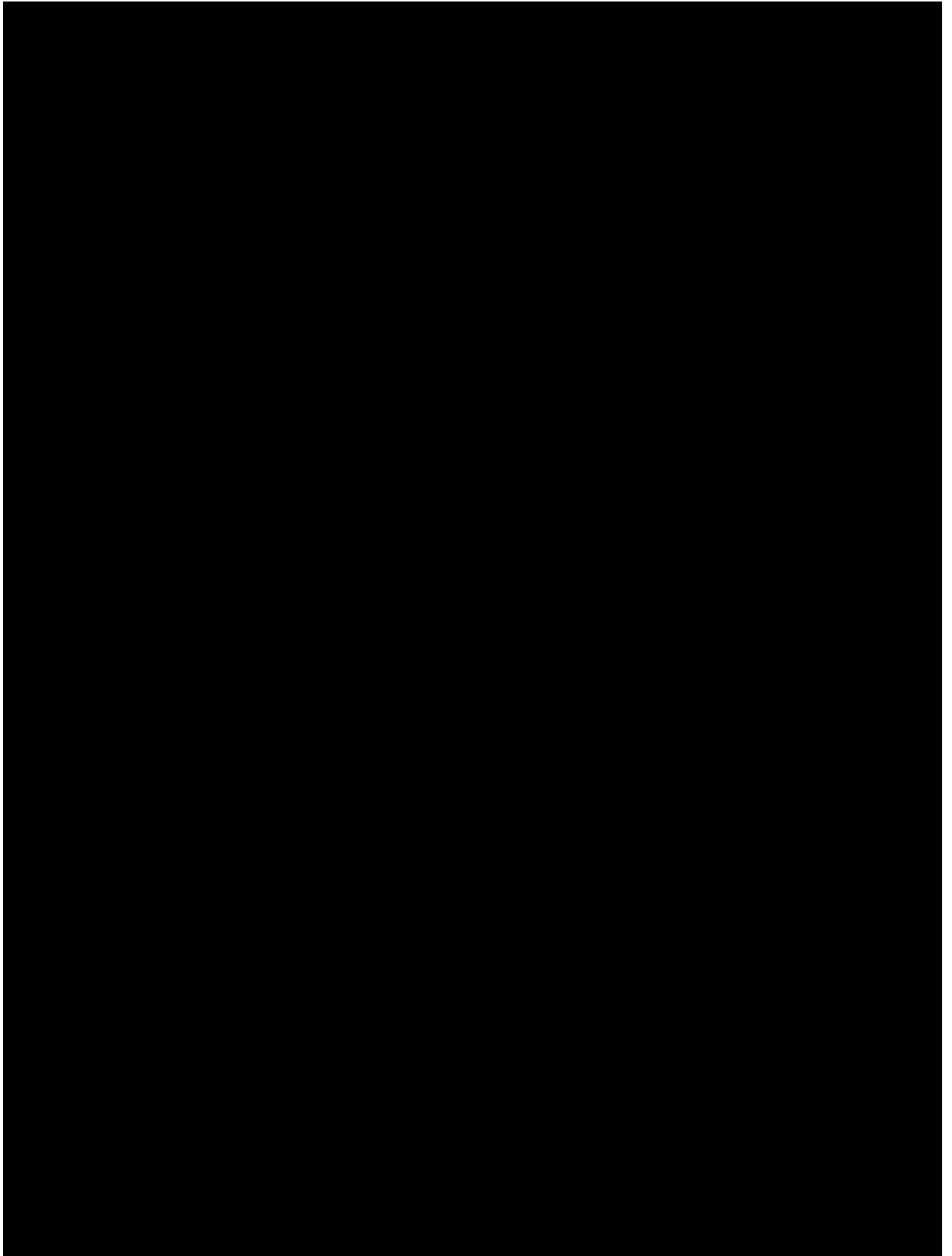
13 Now, I'm going to ask you to
14 look at an exhibit that we have marked for
15 identification as Allaham Exhibit 9.

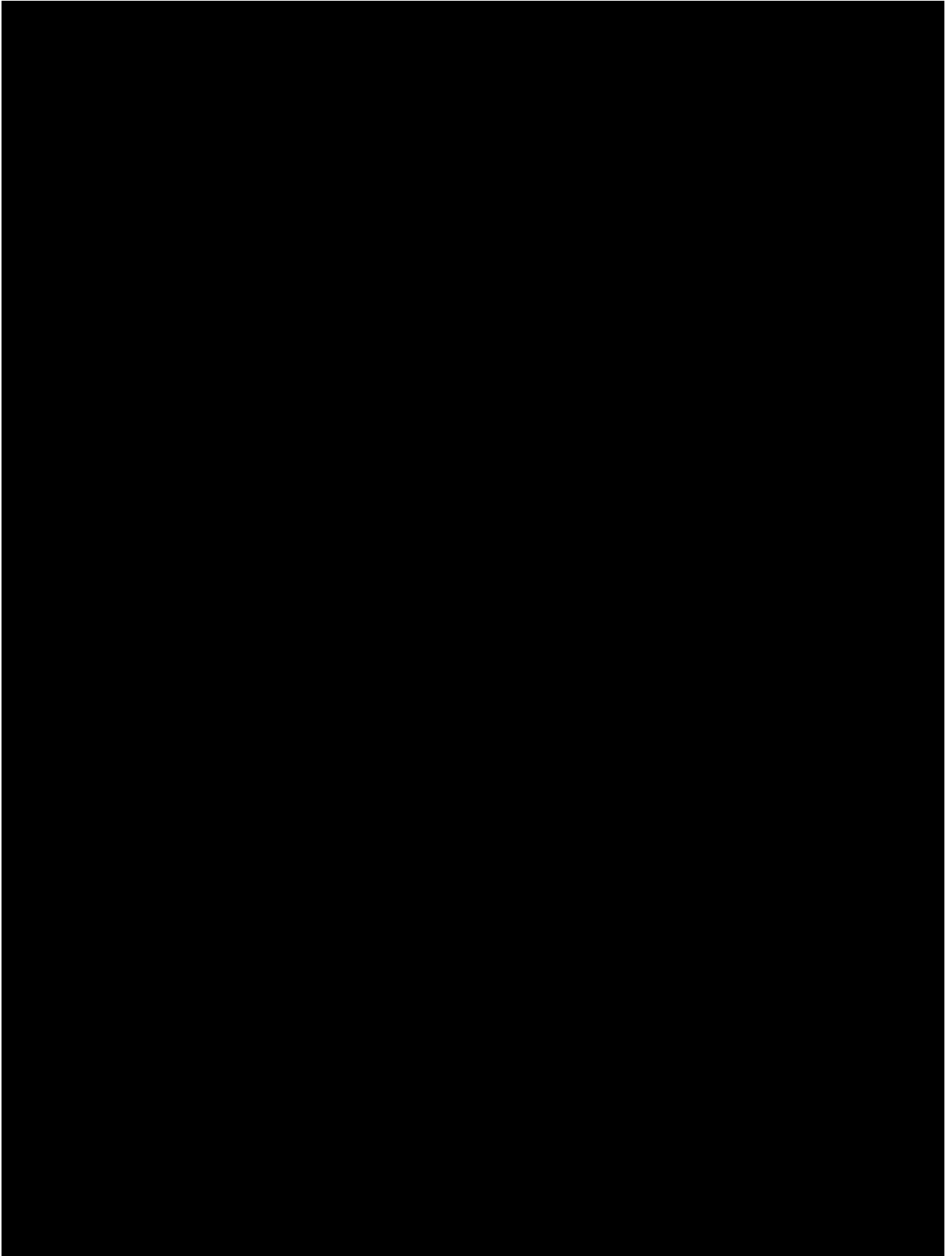


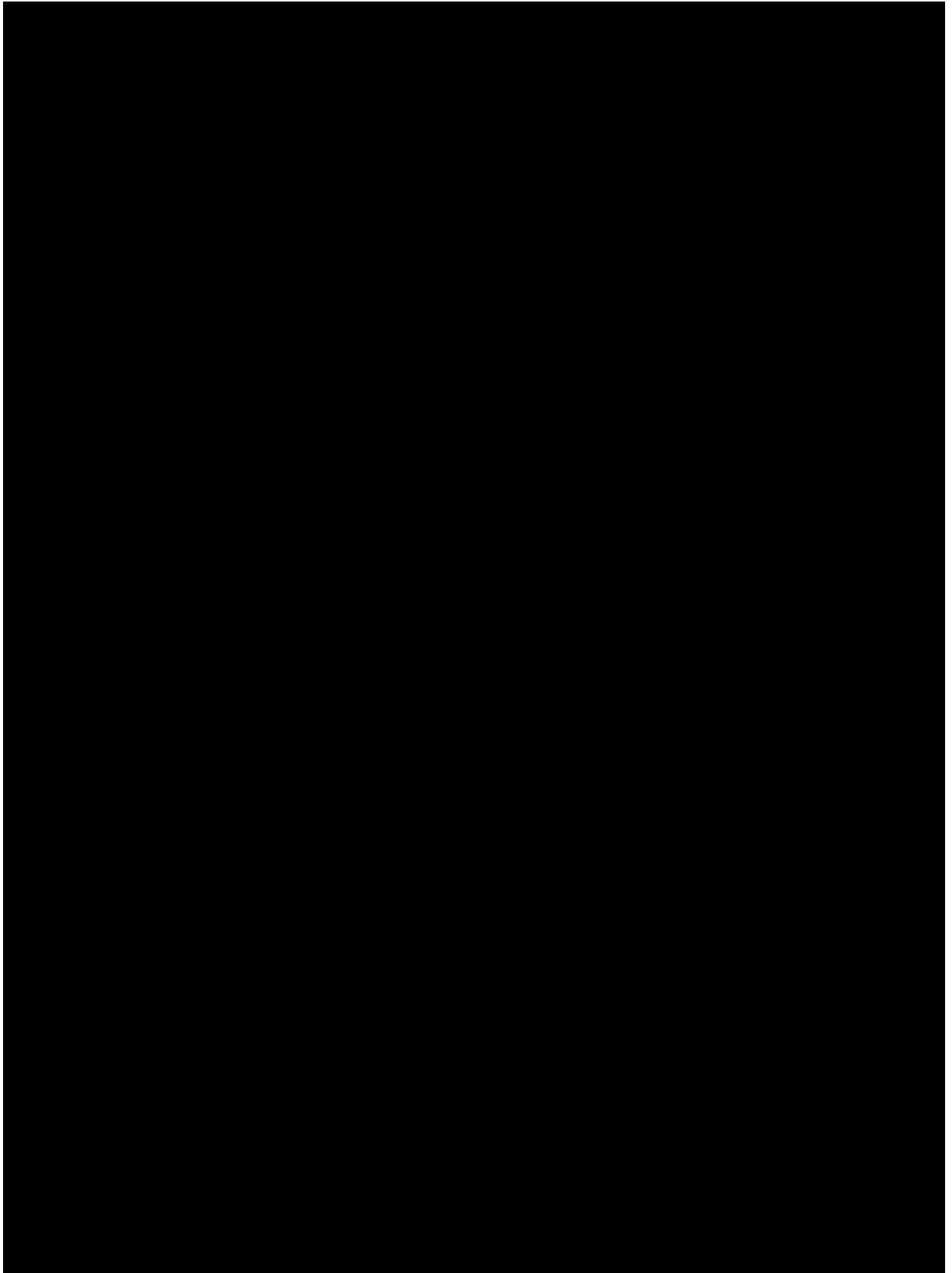


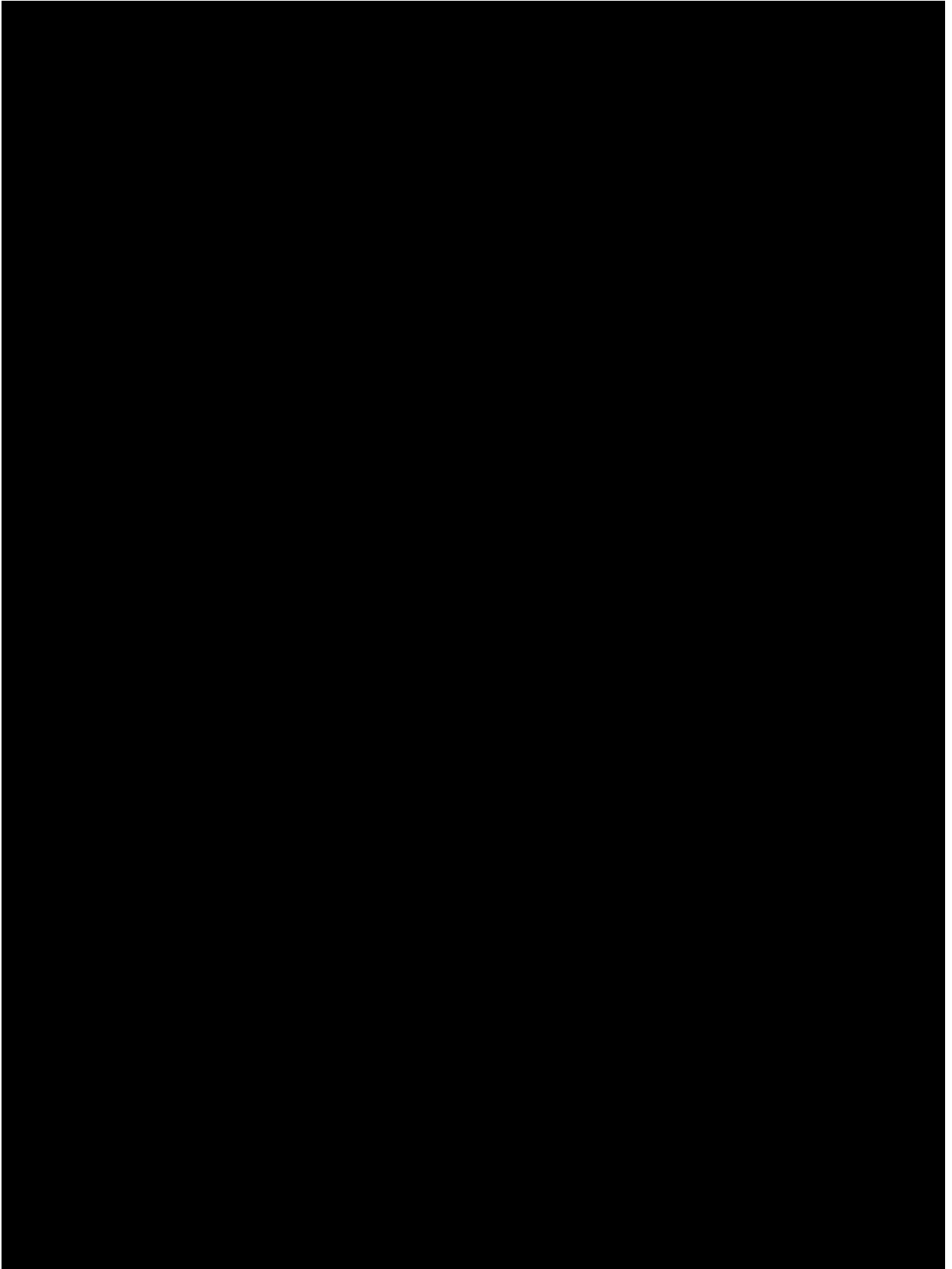


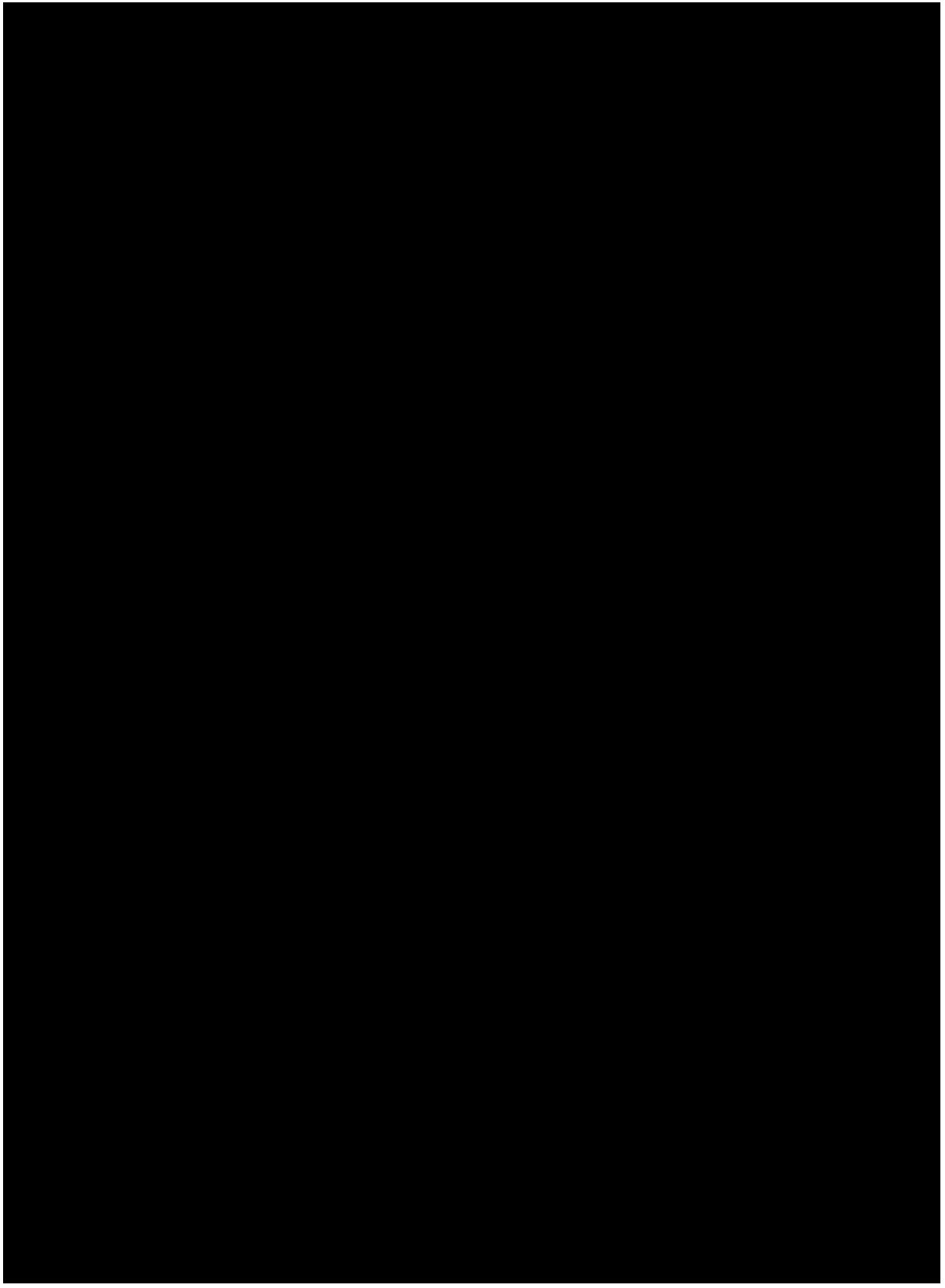


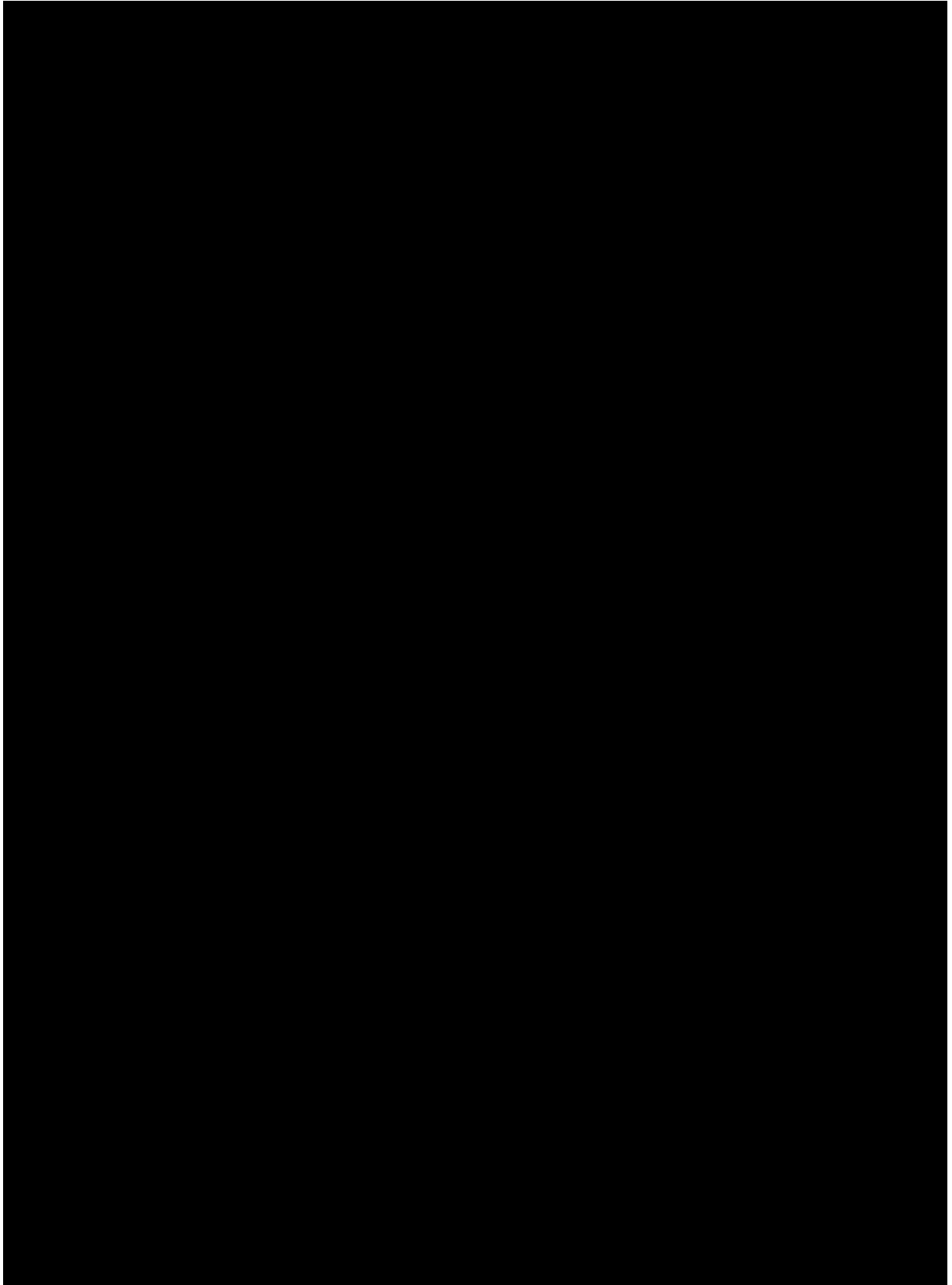


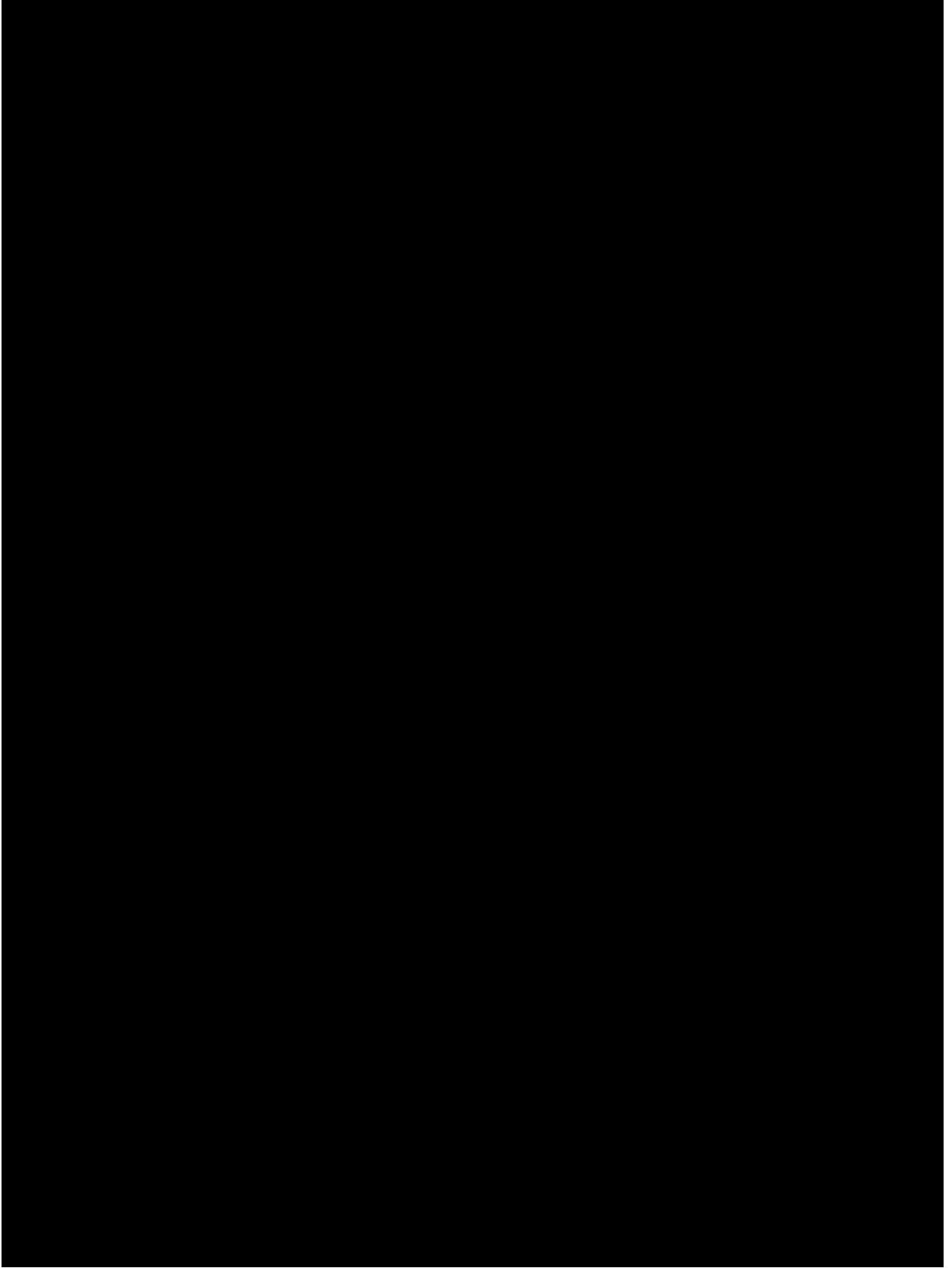


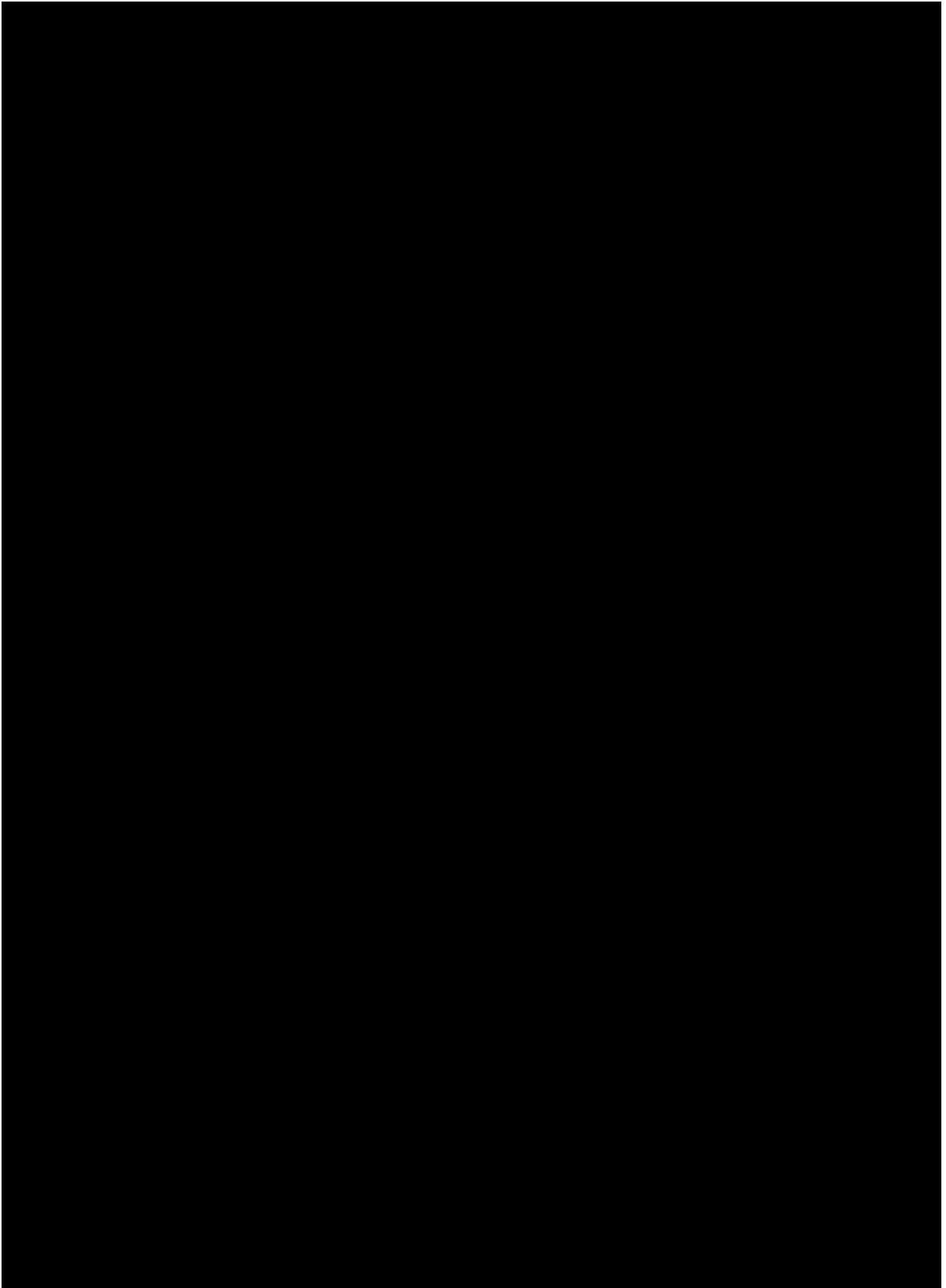


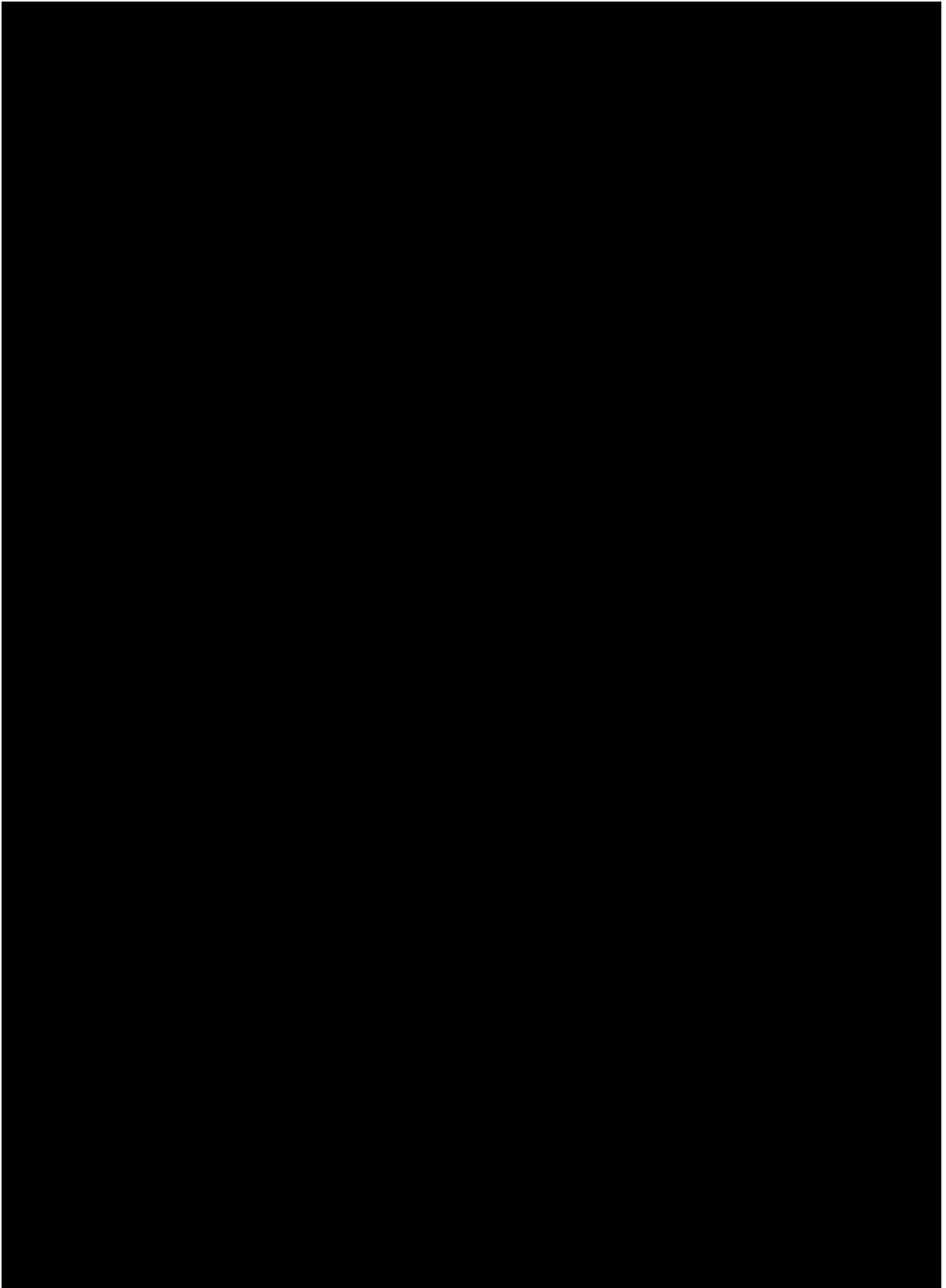


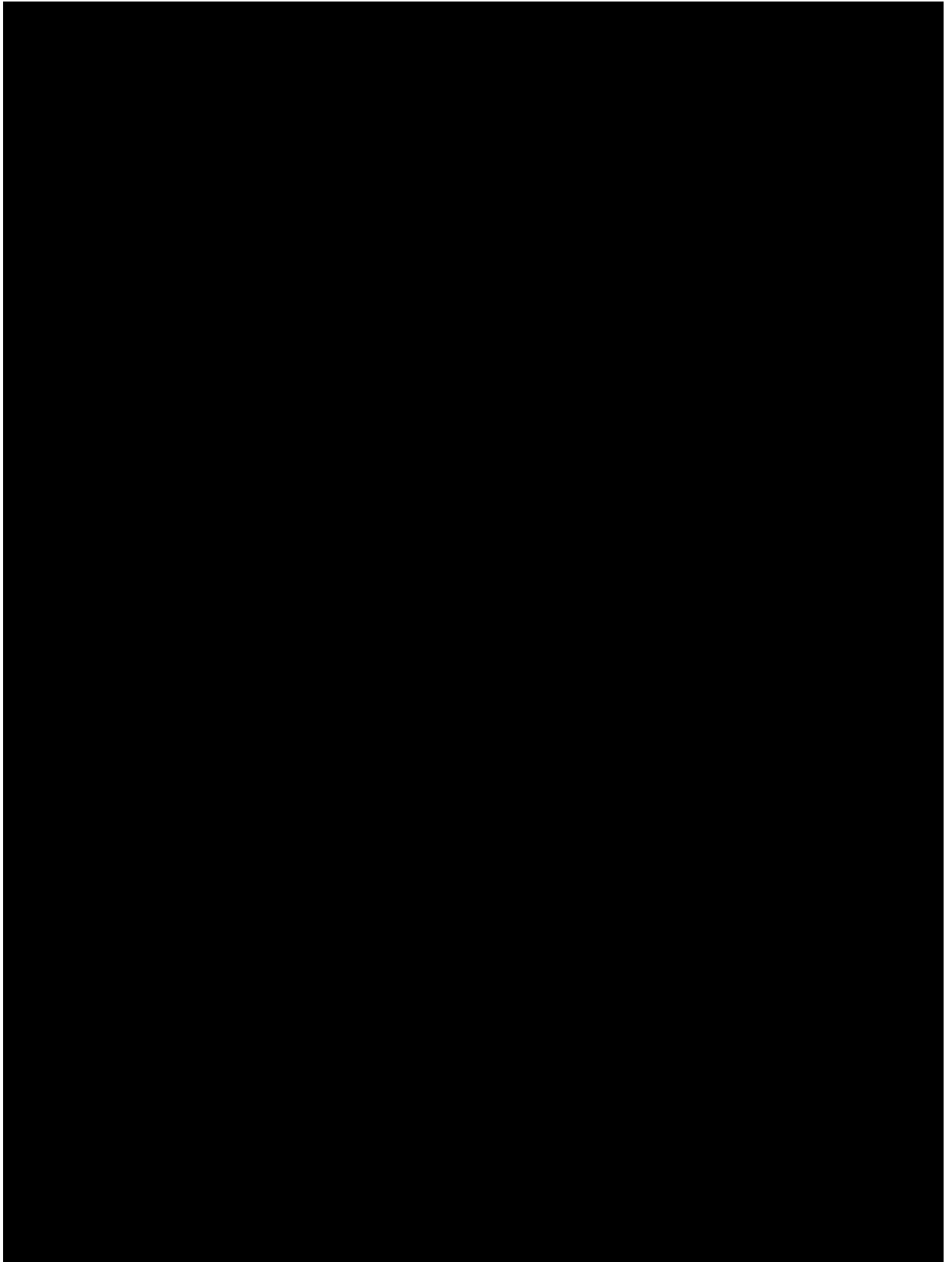


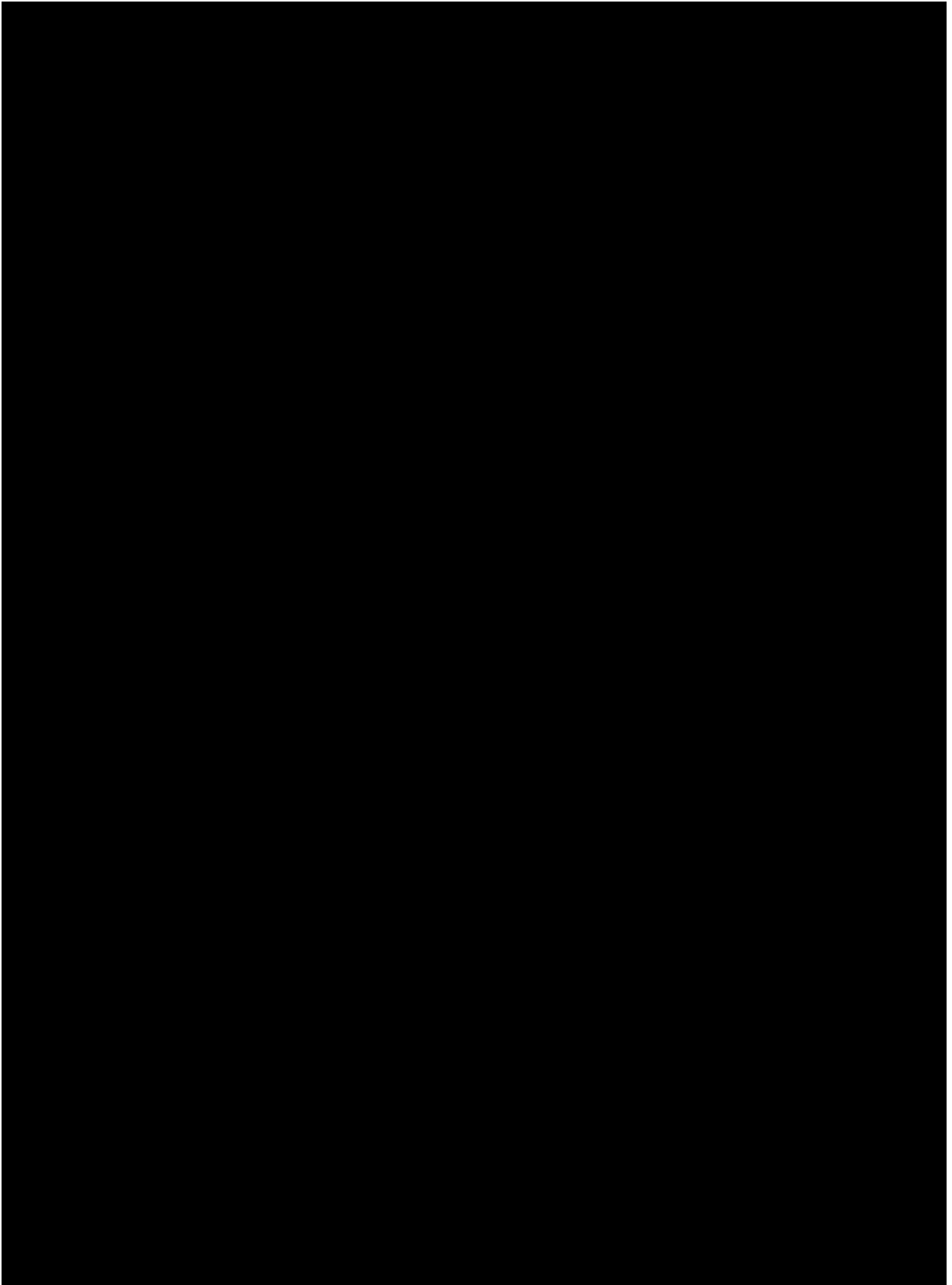


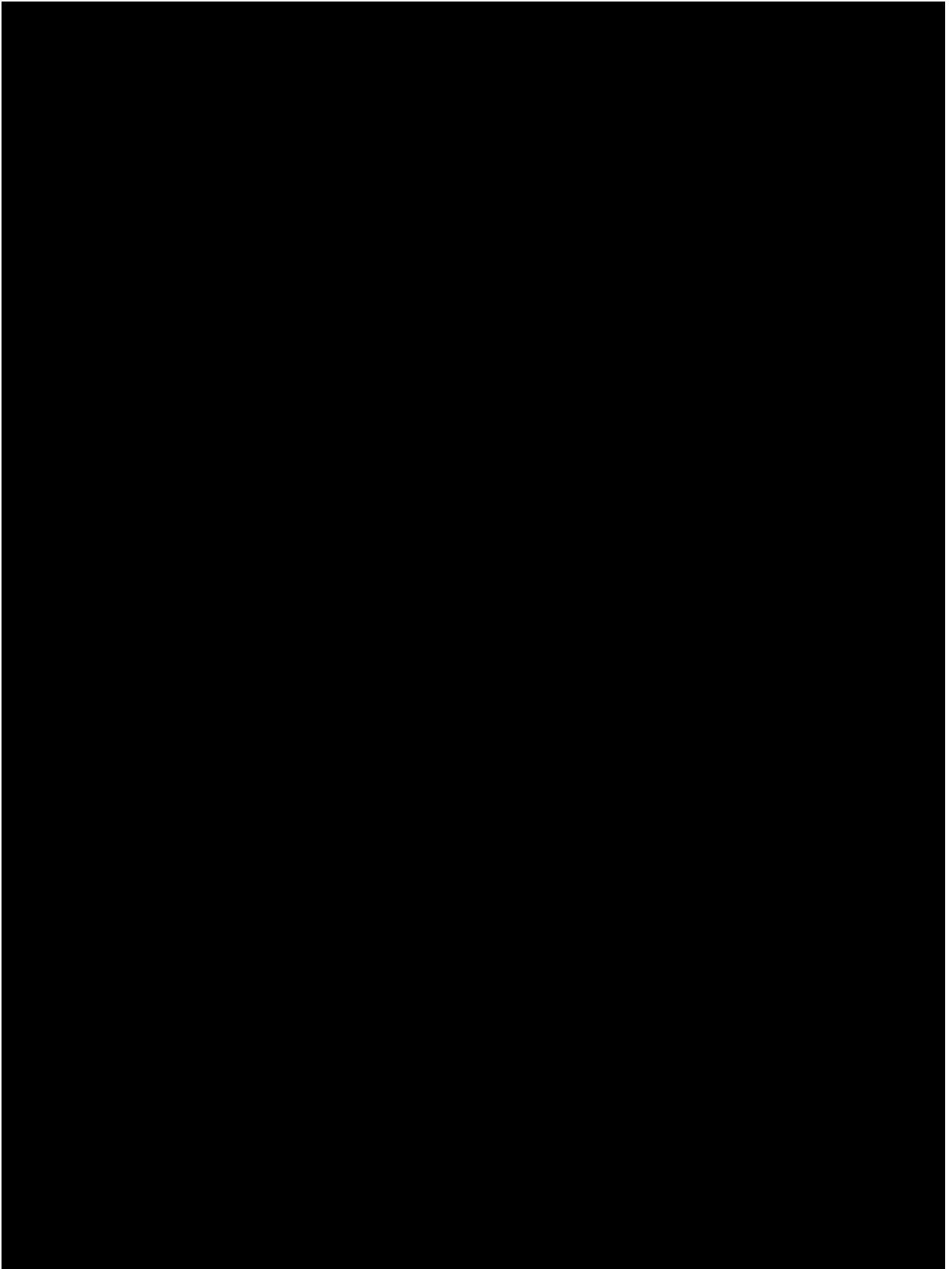


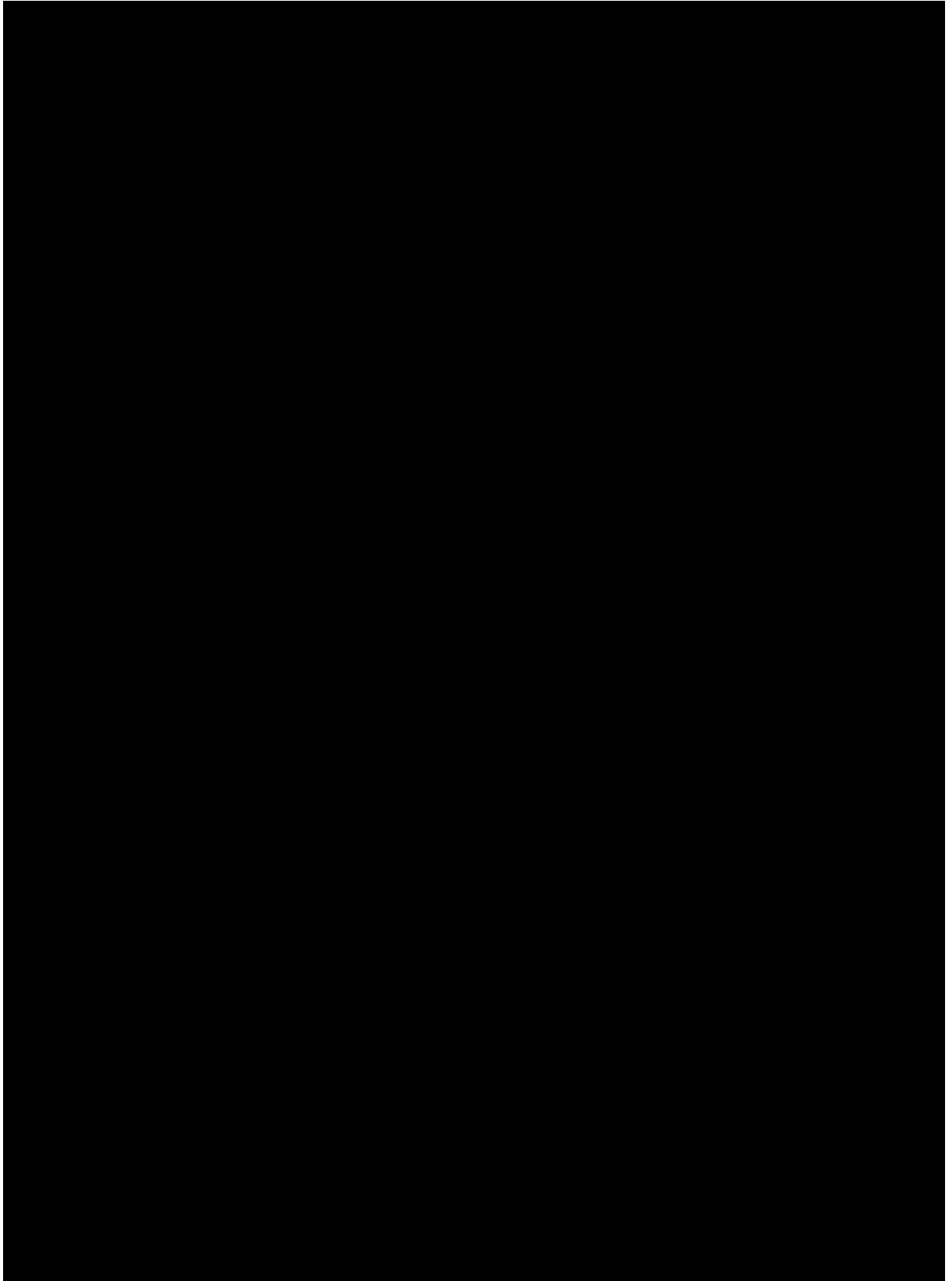


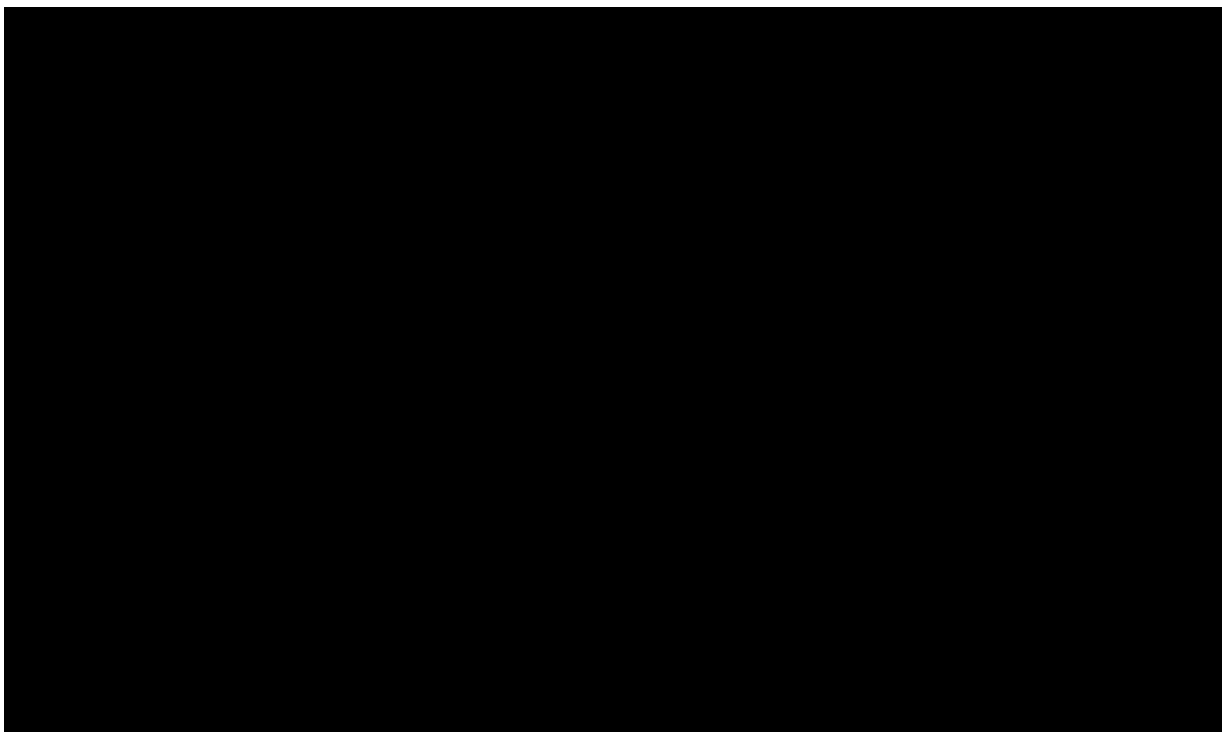












12 MR. GIMBEL: Let's take the
13 break you requested.

14 THE VIDEOGRAPHER: The time is
15 4:22 p.m., and we're going off the
16 record.

17 (Thereupon, a recess was taken,
18 and then the proceedings continued as
19 follows:)

20 THE VIDEOGRAPHER: This is the
21 start of media labeled number seven.
22 The time is 4:30 p.m., and we're back
23 on the record.

24 BY MR. WOLOSKY:

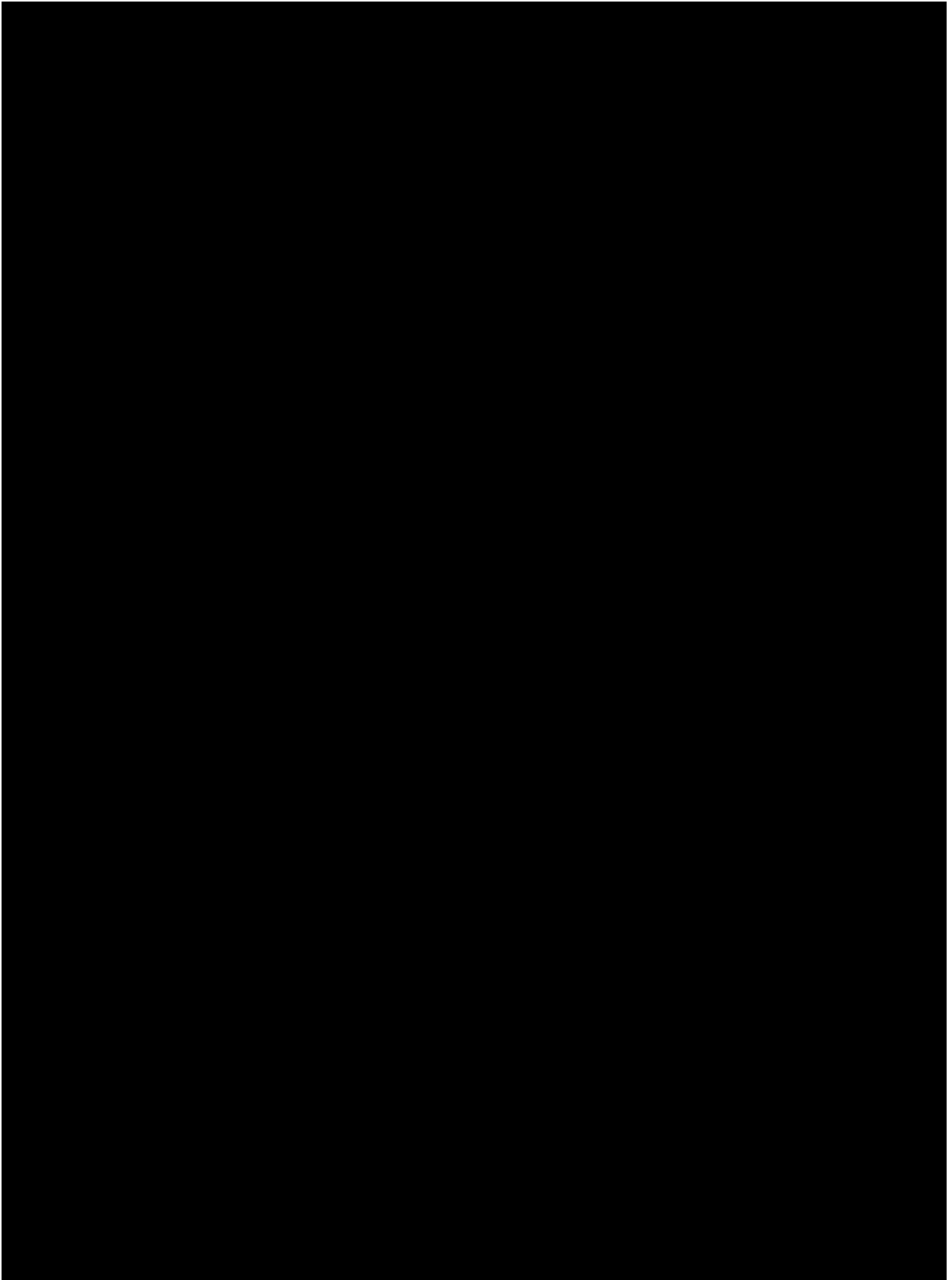
25 Q Okay. I'm going to ask you,

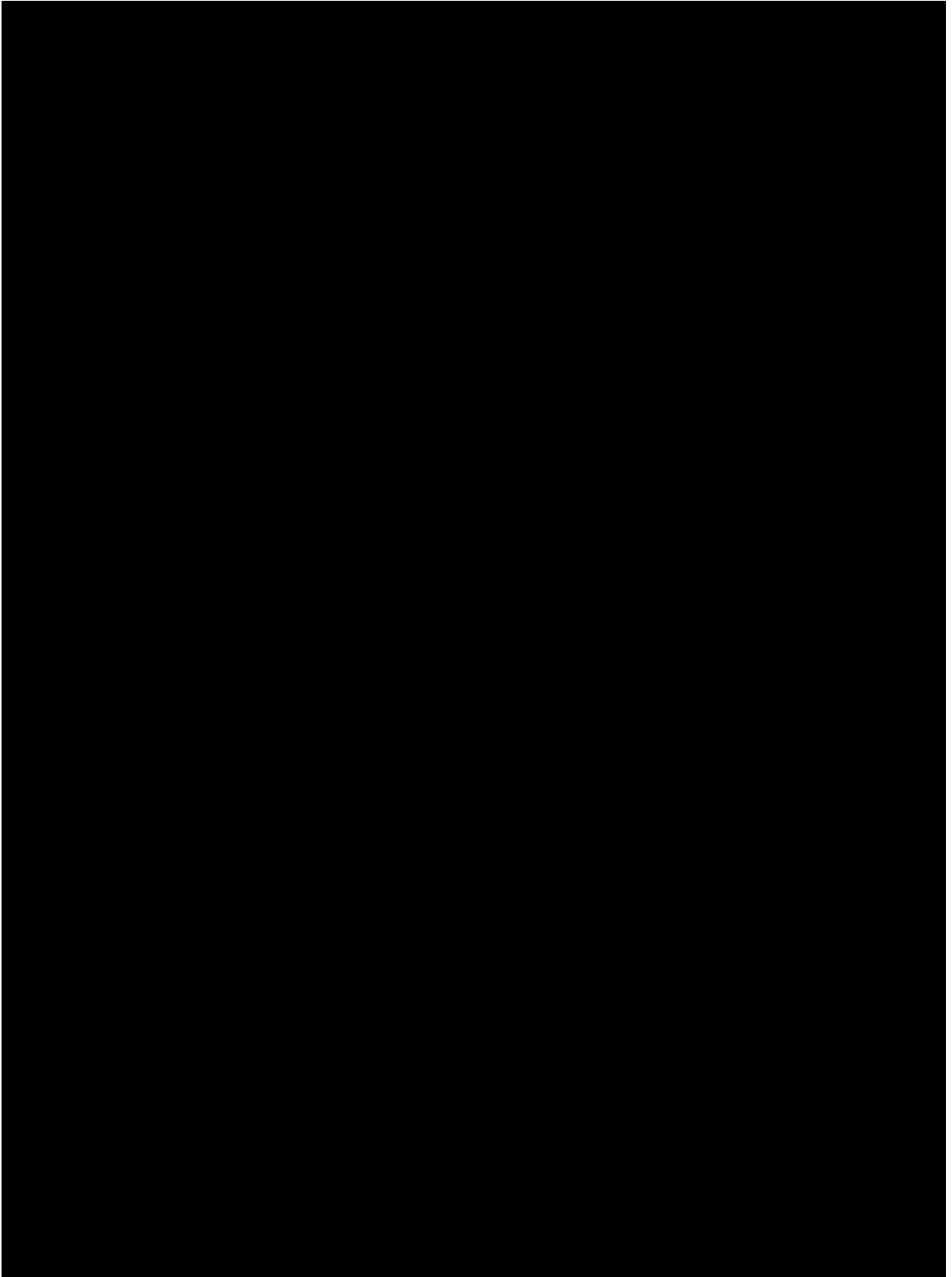
1 Allaham - ATTORNEYS' EYES ONLY
2 Mr. Allaham, to look at the document that
3 we have marked for identification as
4 Exhibit 27.

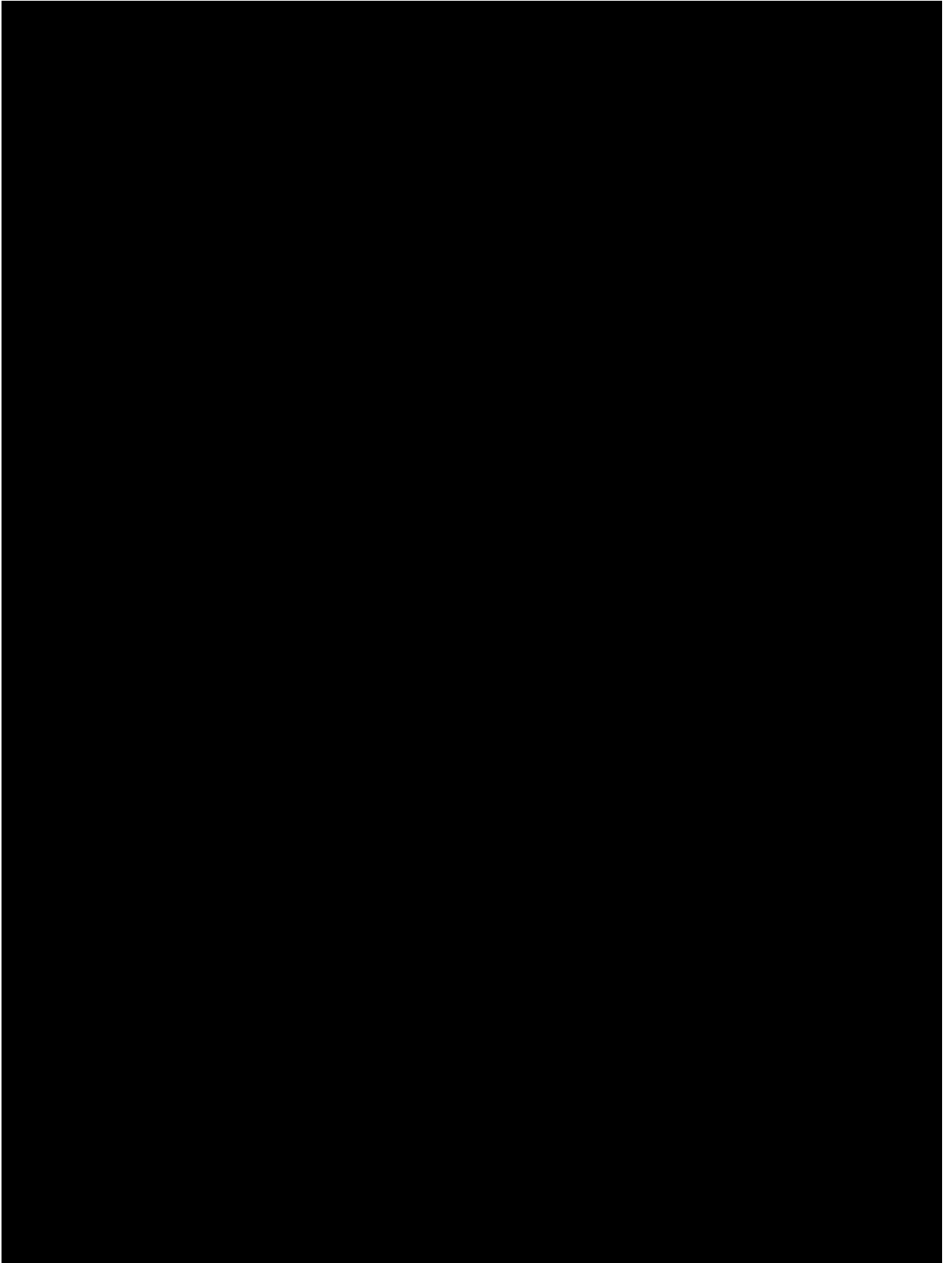
5 (Whereupon, E-mail with
6 attachment, was marked as Allaham
7 Exhibit 27 for identification, as of
8 this date.)

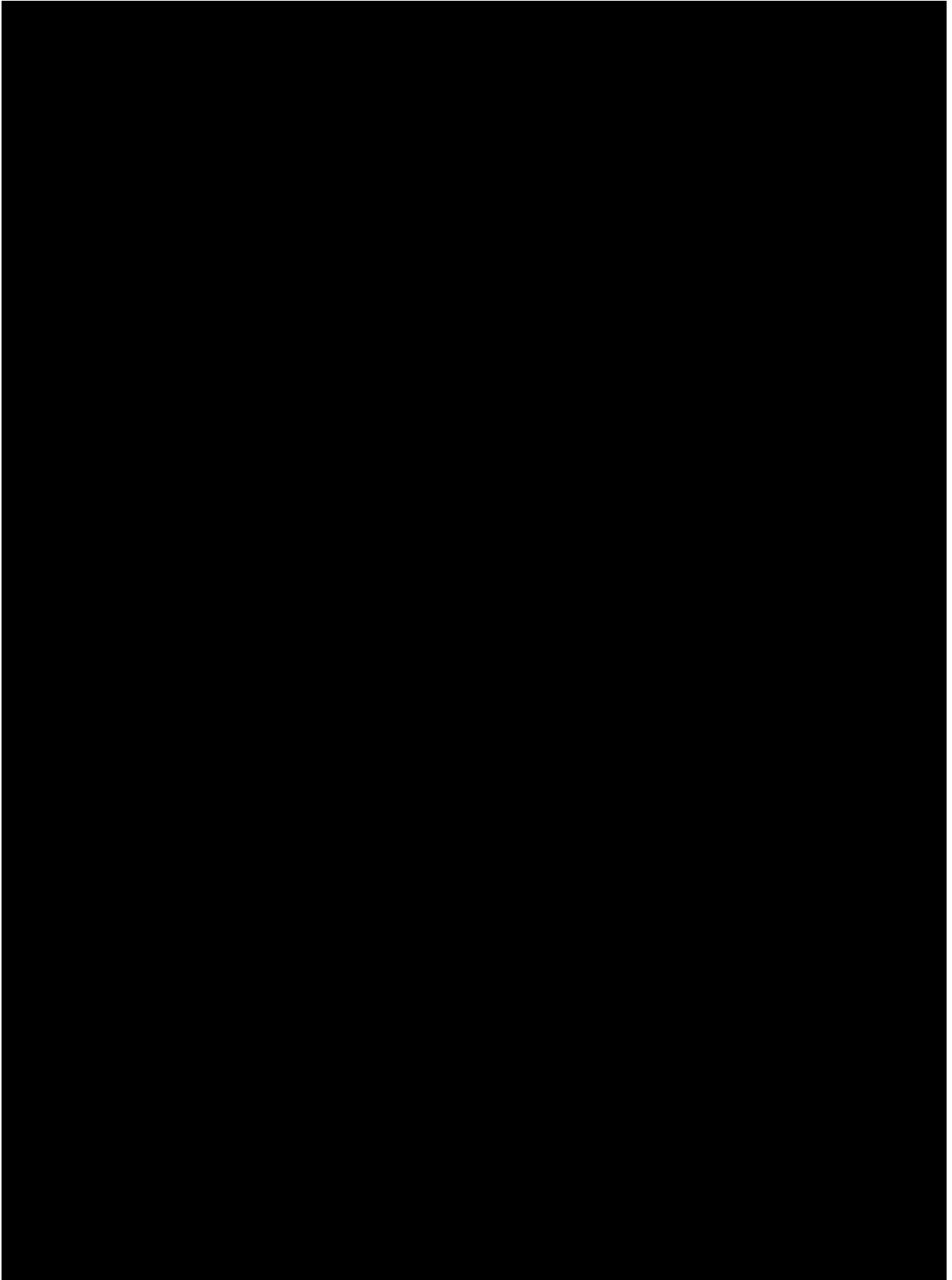
9 BY MR. WOLOSKY:

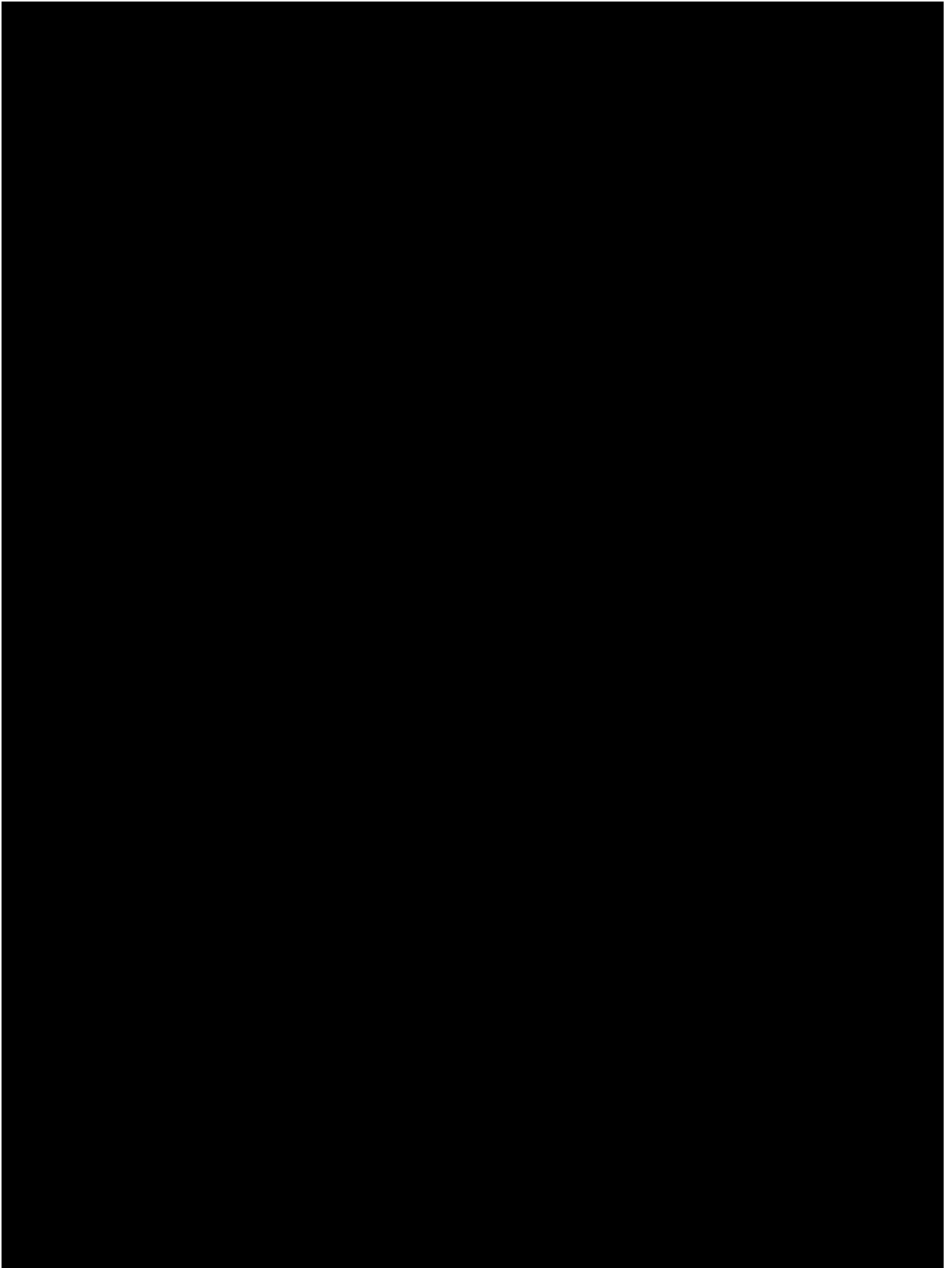














5 Q Did you have concerns that
6 Elliott Broidy had access to the top
7 levels of the White House and was lobbying
8 against Qatar?

9 A I had no idea who Elliott Broidy
10 was to be honest with you. I had no clue
11 who the man was until probably January. I
12 have read the name, but I never connected
13 it. It was always Joel Mowbray was the
14 lobbyist against Qatar. So I never took
15 -- you know, to be honest here, Nick
16 writes a lot and he talks a lot, so I
17 never took it serious. To me, he was
18 pitching and being a salesman. He is a
19 good writer. So that's all I took it as,
20 serious as that.

21 Q Did Nick have concerns that
22 Elliott Broidy had access to the top
23 levels of the White House and was lobbying
24 against Qatar?

25 MS. YUSUF: Objection.

1 Allaham - ATTORNEYS' EYES ONLY

2 A Again, I can't speak for Nick,
3 but one thing I would say for sure, him
4 and Joel Mowbray are two enemies. They
5 hated each other. So they were going at
6 each other's throat anytime they can.

7 So I was not sure if this was
8 really truth, reality, or it is their
9 personal. And I do believe, then, it was
10 more of a personal, who is going to sort
11 of be more successful than the other one.
12 They had true rivalry, and they were best
13 friends and they became enemies.

14 So this is really how much I
15 thought of it. I never -- I knew he was
16 close to Royce because I hosted him
17 several times together, so I was invited
18 to lunch together with them. So I knew
19 that part is true.

20 So to the extent of Elliott, I
21 don't, I never really honestly bought into
22 it. And Nick was more obsessed with Joel
23 and how they can go at each other's
24 throat.

25 Q I'm sorry, you mentioned a lunch

1 Allaham - ATTORNEYS' EYES ONLY
2 with Ed Royce.

3 Who attended that lunch?

4 A I was -- Joel invited me. Joel
5 likes free meals. So when they invited me
6 in my own place, meaning he wants a free
7 meal. So I was invited to a lunch, but I
8 did not attend it, I hosted them.

9 Q I see.

10 And did you ever discuss with
11 Nick concerns that he had that Elliott
12 Broidy had access to the top levels of the
13 White House that would interfere with his
14 plans to work for Qatar?

15 A Say that again, I'm sorry.

16 Q Can you re-read the question,
17 please?

18 (Record read)

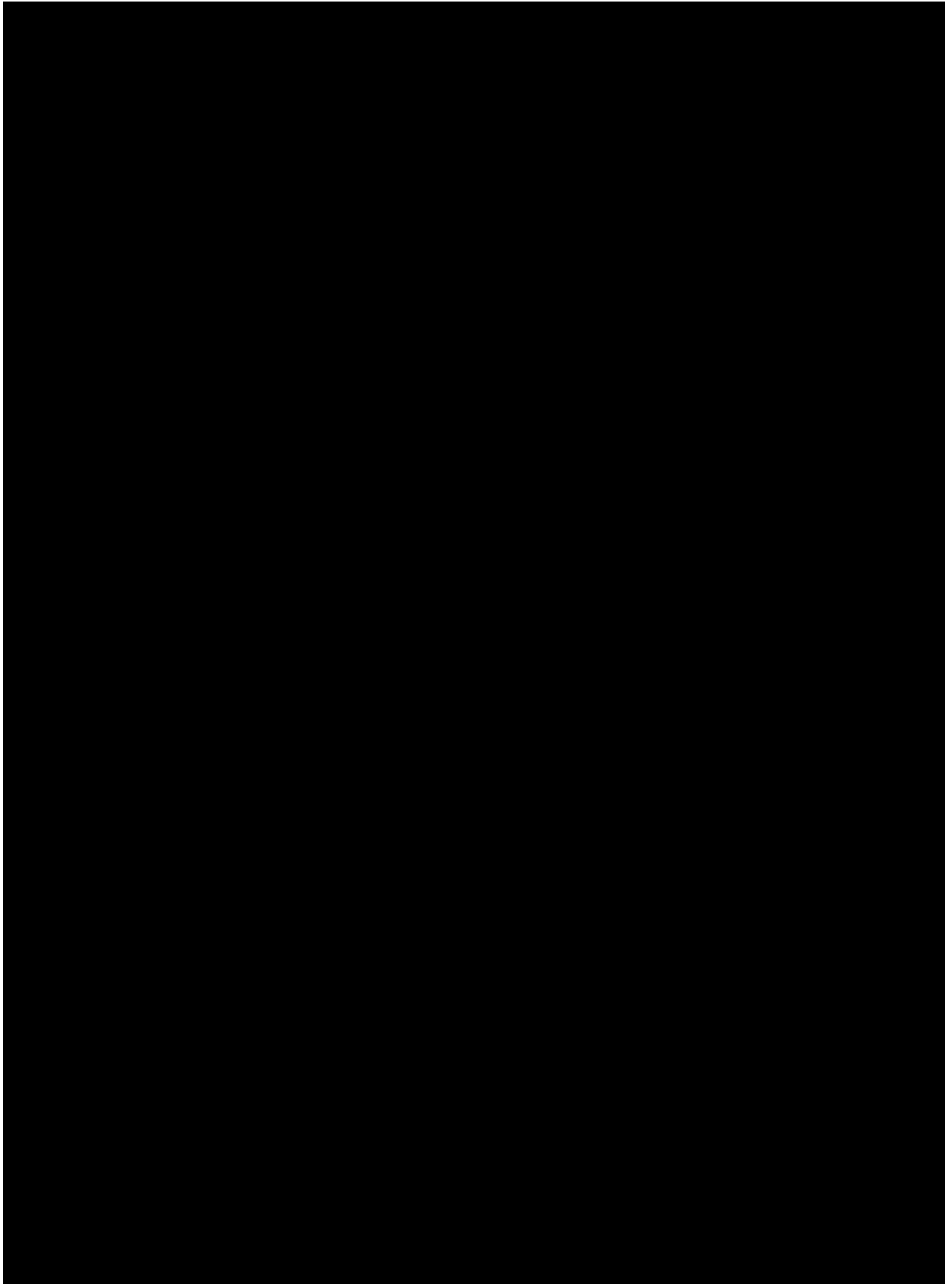
19 A No, I don't recall.

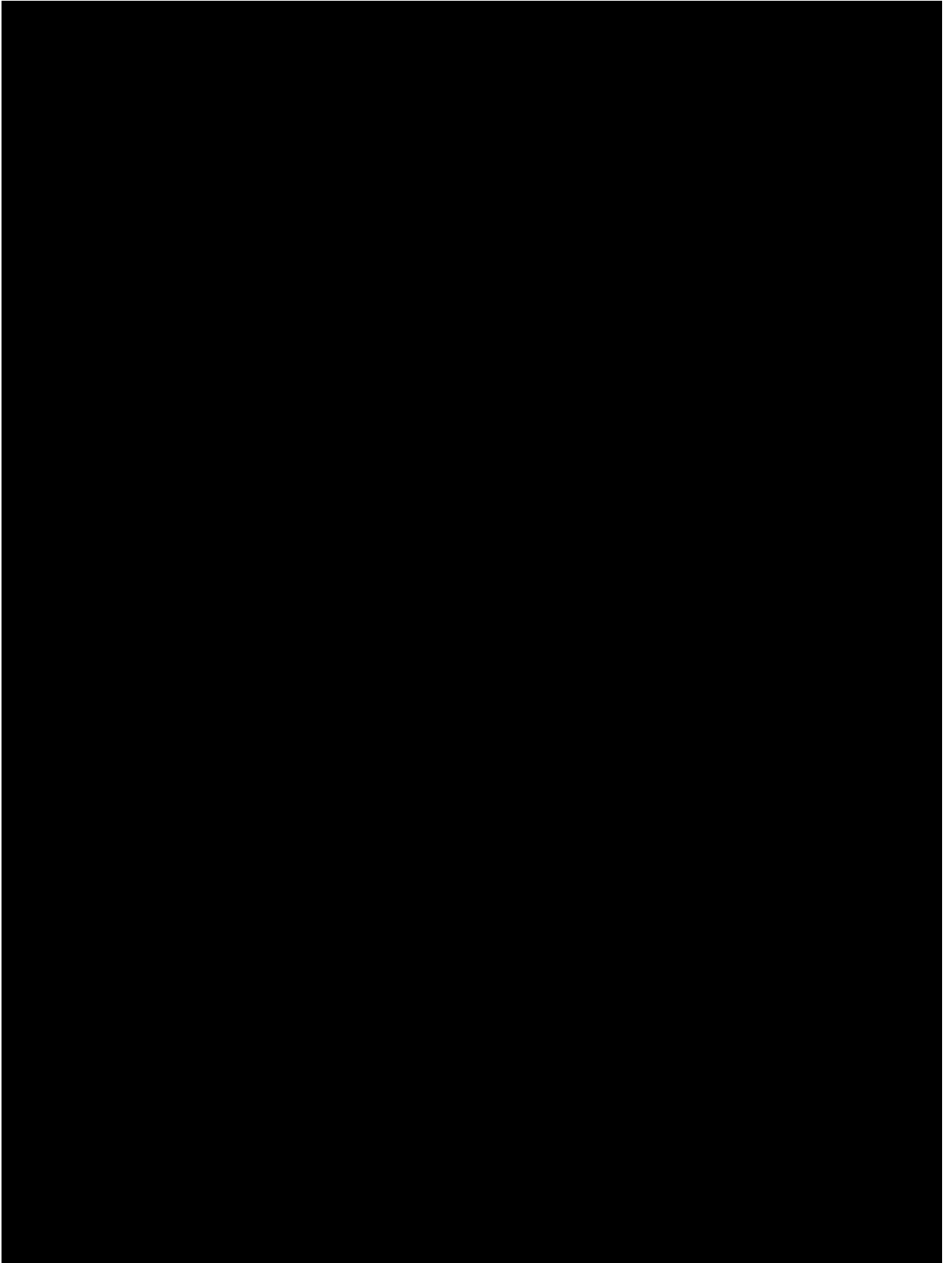
20 Q Did you ever have discussions
21 with Jamal Benomar about the influence
22 that Elliott Broidy had at the top levels
23 of the White House lobbying against Qatar?

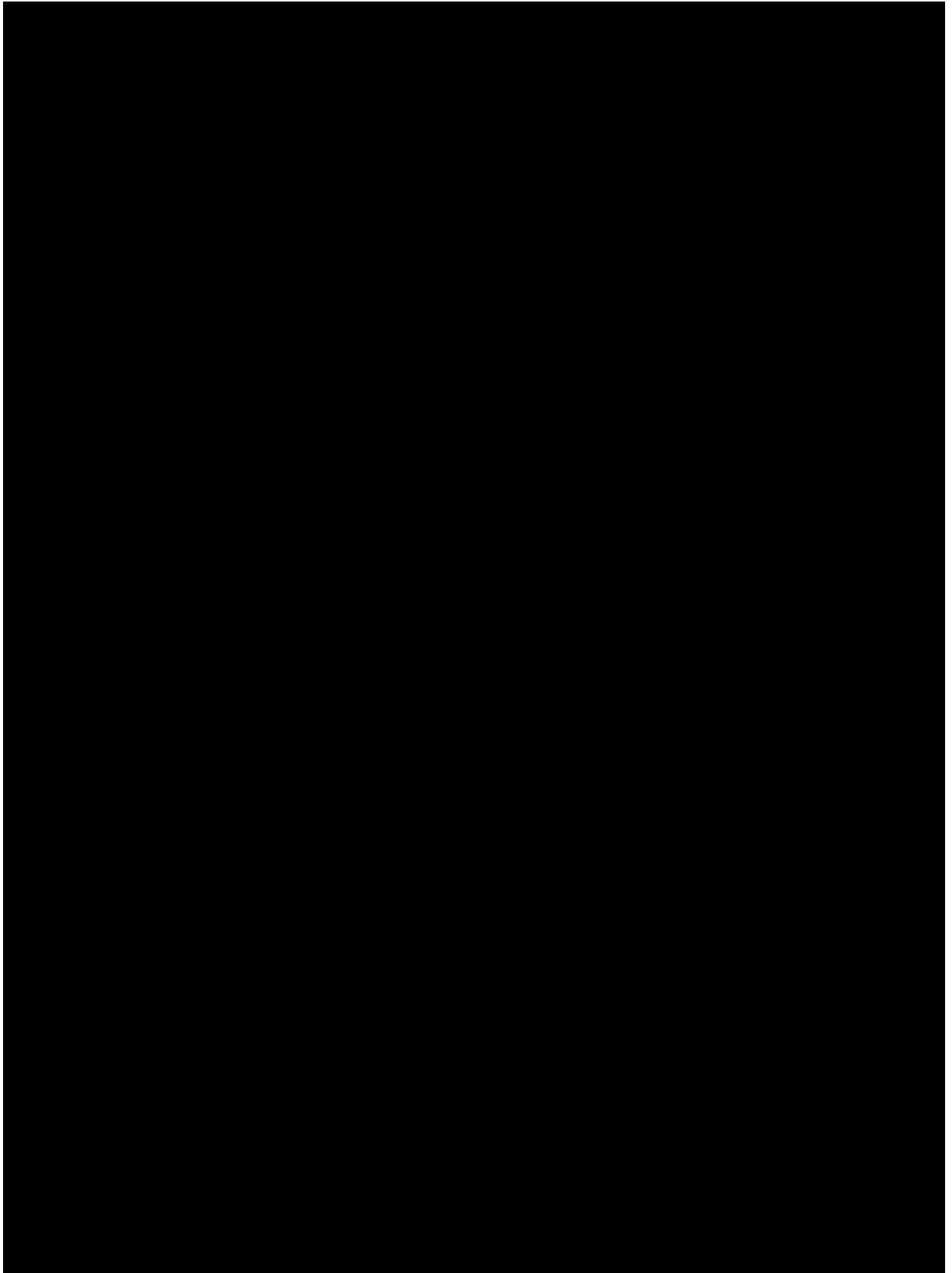
24 A I don't think I knew about it,
25 so I would not have a discussion about

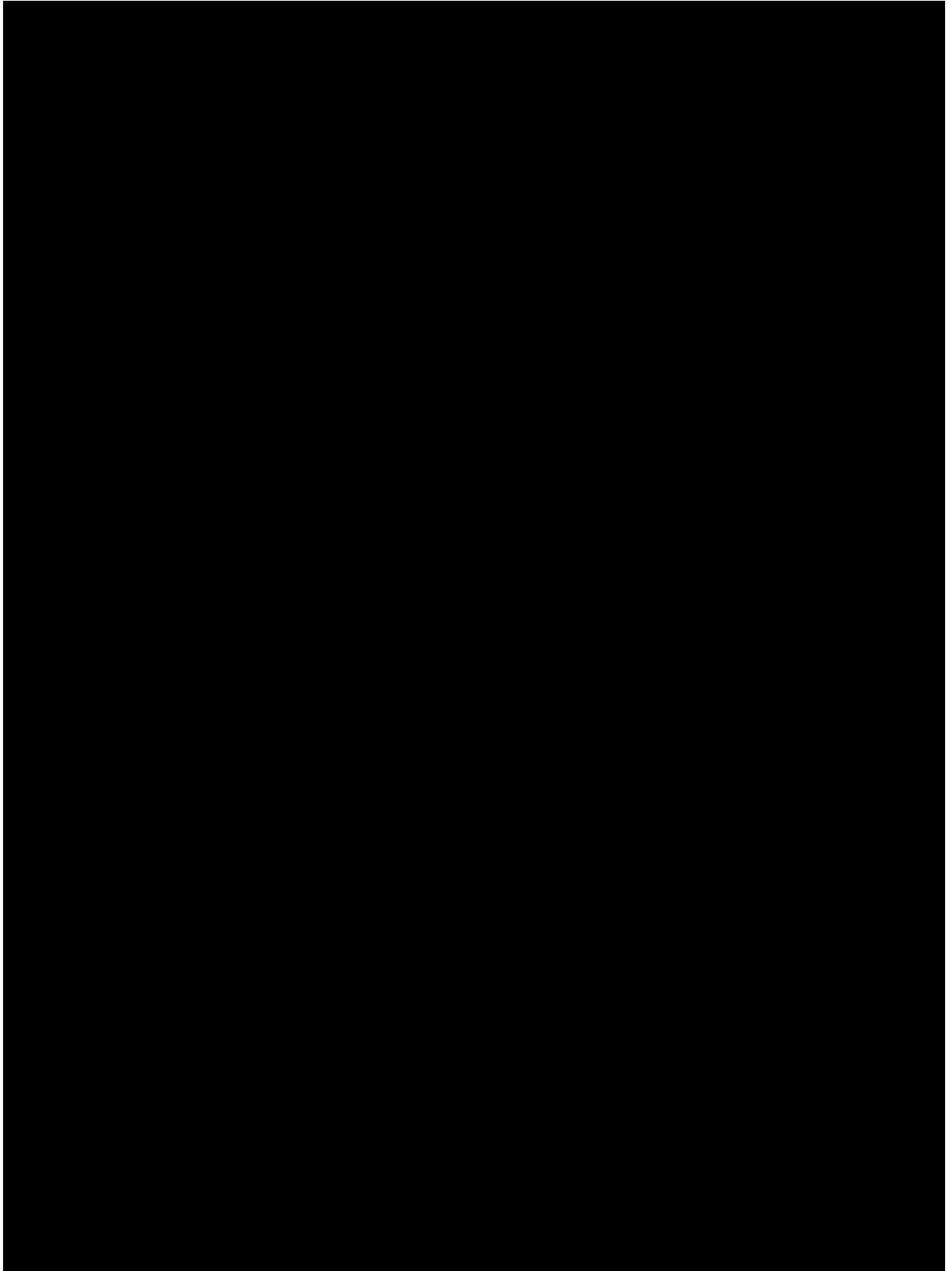
1 Allaham - ATTORNEYS' EYES ONLY

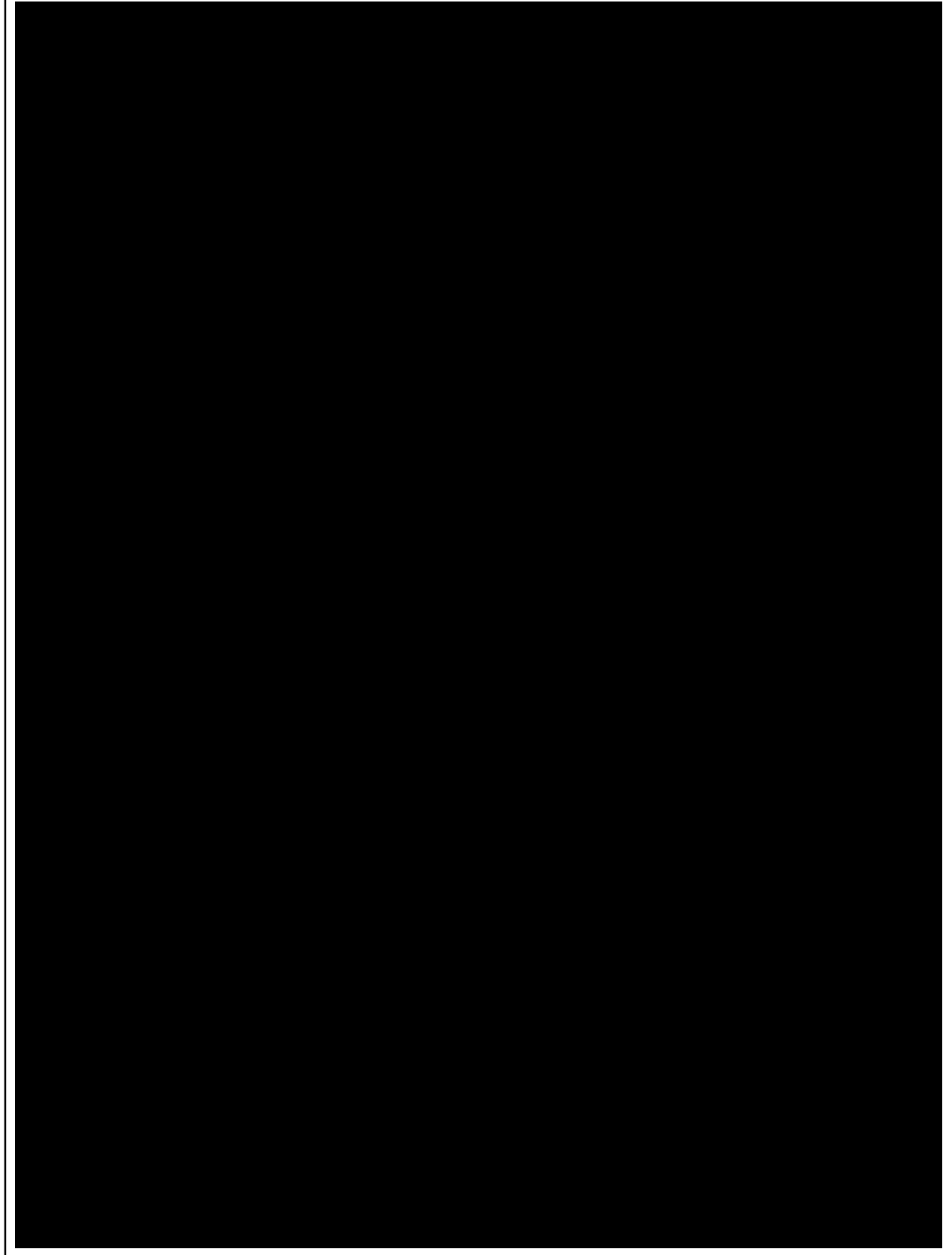


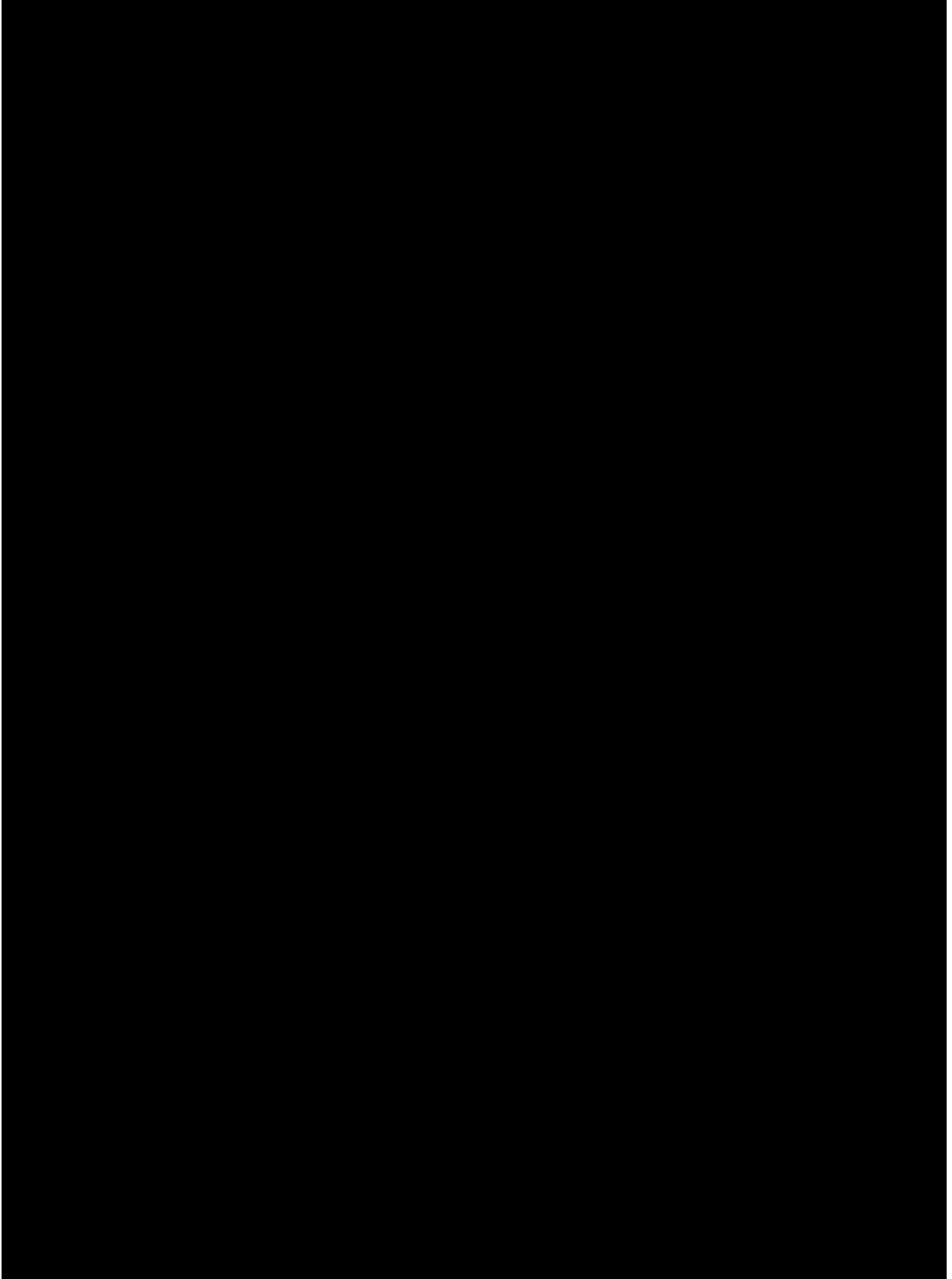


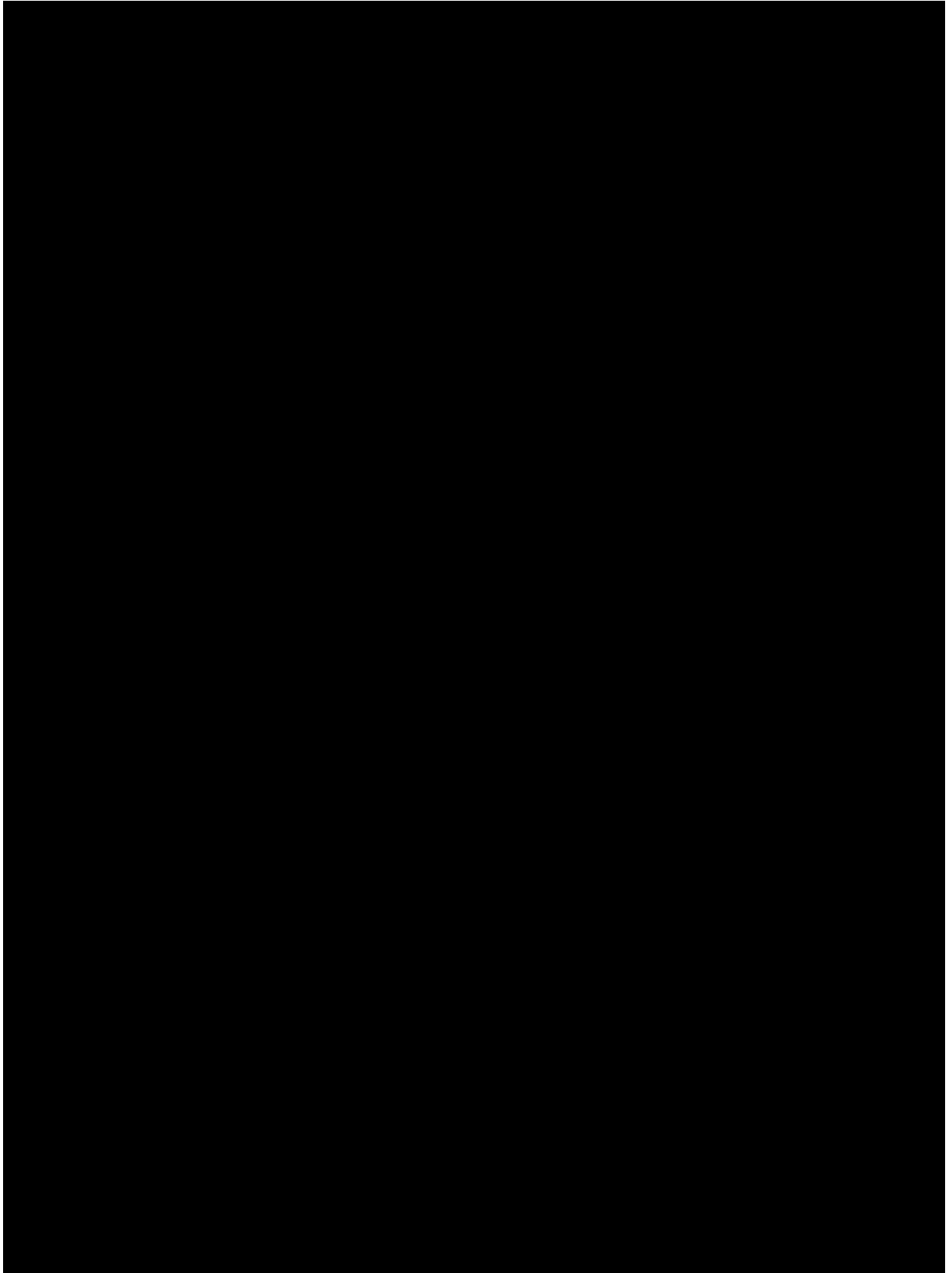


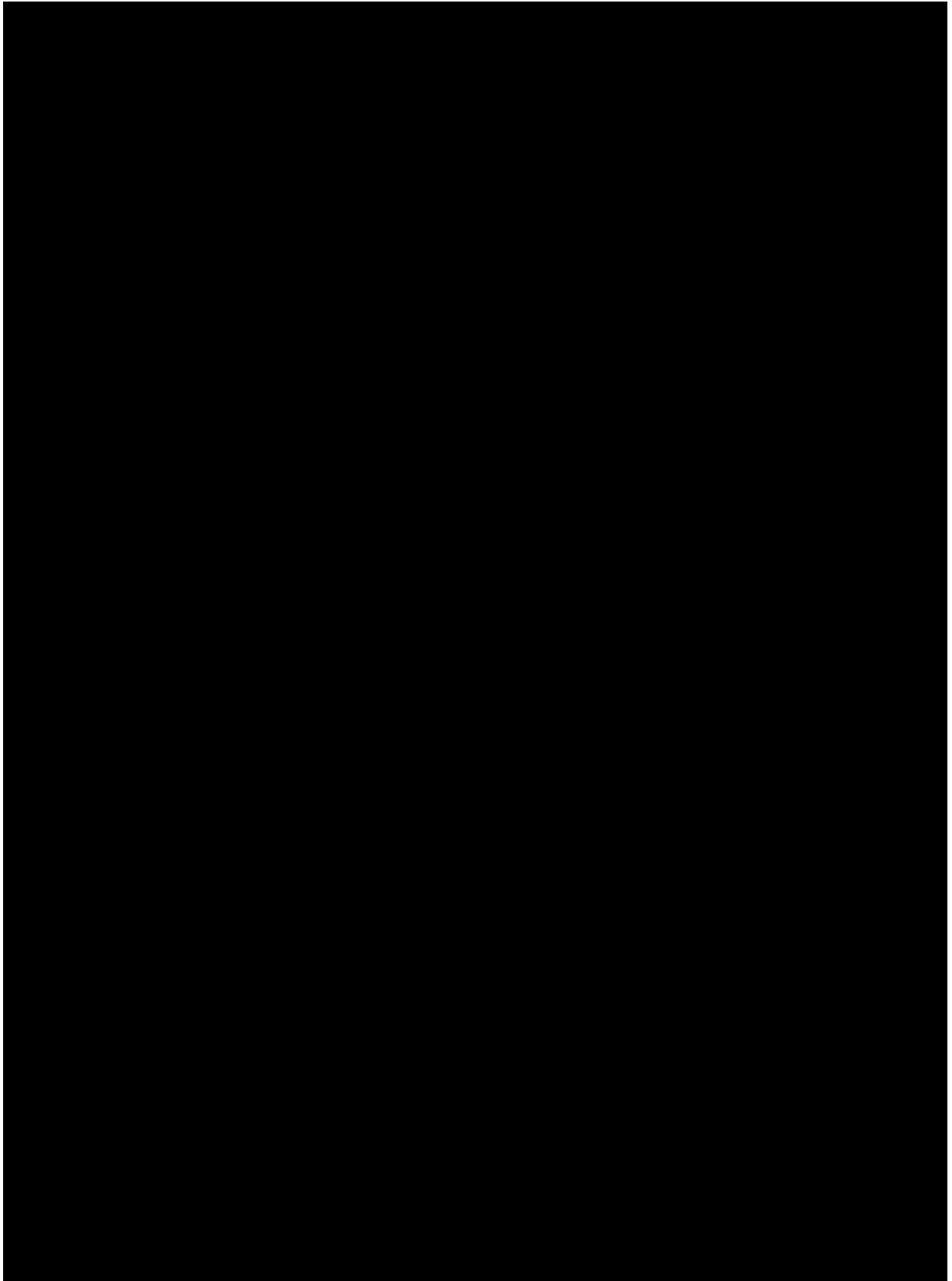


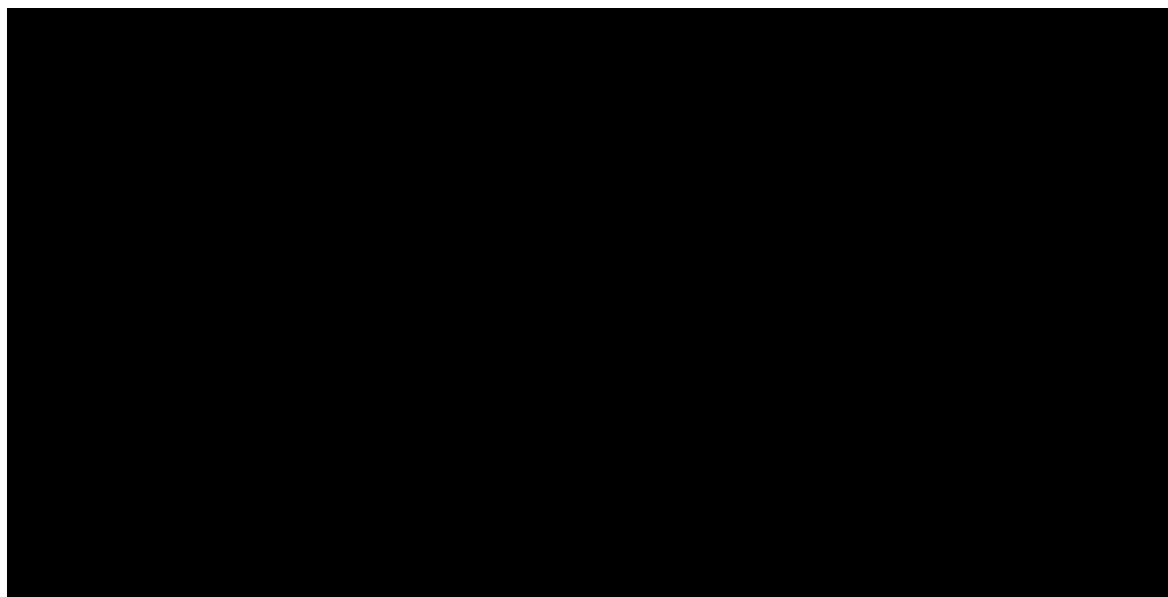












10 Q Who is Jack Abernathy?

11 A A friend of mine.

12 Q What kind of work do you do with
13 Jack Abernathy?

14 MS. YUSUF: Objection. Assumes
15 facts not in evidence.

16 Q Do you do work with
17 Mr. Abernathy?

18 A No, I don't.

19 Q Is your relationship strictly
20 personal?

21 A I would say personal. I mean he
22 had a crypto company, whatever,
23 bitcoin-type-of-thing a month or two ago.
24 I mean it is more personal, but he asked
25 me to invest and I did not invest.

1 Allaham - ATTORNEYS' EYES ONLY

2 Nothing more than that.

3 Q Did you ever discuss with him
4 your work with the State of Qatar?

5 A Never.

6 Q Do you know why he was on
7 WhatsApp message chats with Jamal Benomar
8 and Nick Muzin?

9 MS. YUSUF: Objection. Assumes
10 facts not in evidence.

11 MR. GIMBEL: Objection.

12 A He was never with Jamal in a
13 conversation.

14 Q Can I refer you back to Exhibit
15 5.

16 A Sure.

17 Q The page that is Bates stamped
18 number 50 in that exhibit.

19 Do you see a series of text
20 messages that include Jack Abernathy's
21 name on the left-hand side?

22 A Yes.

23 Q Do you have any idea why Jack
24 Abernathy's name is there?

25 A I looked and this is -- I

1 Allaham - ATTORNEYS' EYES ONLY
2 brought this up with my counsel. This was
3 deleted before Jamal became part of the
4 text. Jack was never in the text with us.
5 He was never part of it.

6 Q So he was deleted from the text
7 messages, that group chat that included
8 Nick Muzin and Jamal?

9 A That me, Nick, and Jack. Jack
10 was taken out when Jamal -- I think, a day
11 or two, when Jamal came in.

12 Q Do you know where that text
13 message is that includes Jamal in that
14 group chat?

15 A I don't believe it was any. The
16 way this reads, it's different, the way it
17 shows on the phone. But I don't believe
18 it was ever -- I don't believe it was ever
19 a time that they were together.

20 Q Mr. Abernathy was part of a
21 group chat with you and Mr. Muzin, but
22 then when Jamal Benomar was added, Jack
23 Abernathy was deleted; is that correct?

24 MS. YUSUF: Objection.

25 Misstates the testimony. I think he

1 Allaham - ATTORNEYS' EYES ONLY
2 said it was the other way around.

3 Q Can you answer the pending
4 question?

5 MR. WOLOSKY: Can you --
6 (Record read)

7 A I think it was a much period of
8 time before that. There was no
9 conversation initiated between the three
10 of us, between Nick, me, and Jack.
11 Probably, a month or two before that was
12 no conversation, just a group that was
13 created for that.

14 Q For you, Nick and Jack?

15 A Yeah, just to chat. Jack is,
16 you know, a smart guy and just to -- but
17 when, I believe -- and this is something
18 that I saw on my phone -- when Jamal
19 joined, Jack was taken out, but there was
20 no conversation between the three of us,
21 which is me and Nick and Jack, probably
22 days or months before Jamal was added,
23 with Jack.

24 Q What were the subject matters
25 concerning which you and Nick and Jack

1 Allaham - ATTORNEYS' EYES ONLY

2 chatted?

3 MS. YUSUF: Objection.

4 Relevance.

5 A It is really unrelated to this.

6 So it is not something that is relevant.

7 Q What was the subject matter?

8 A I don't know. I really don't

9 recall, but nothing to do with Qatar or

10 anyone on this list. It is really just he

11 is an experienced lobbyist and just --

12 nothing that really has any relevance that

13 I can recall.

14 Q Because he was an experienced

15 lobbyist, did you or Mr. Muzin consult

16 with him about activities you were engaged

17 in?

18 A I don't recall us consulting

19 anything to do with -- any relationship.

20 It was just I knew Jack. I introduced him

21 to Nick. So we were looking for clients,

22 so Nick thought Jack could get the clients

23 since he was no longer in the lobbying

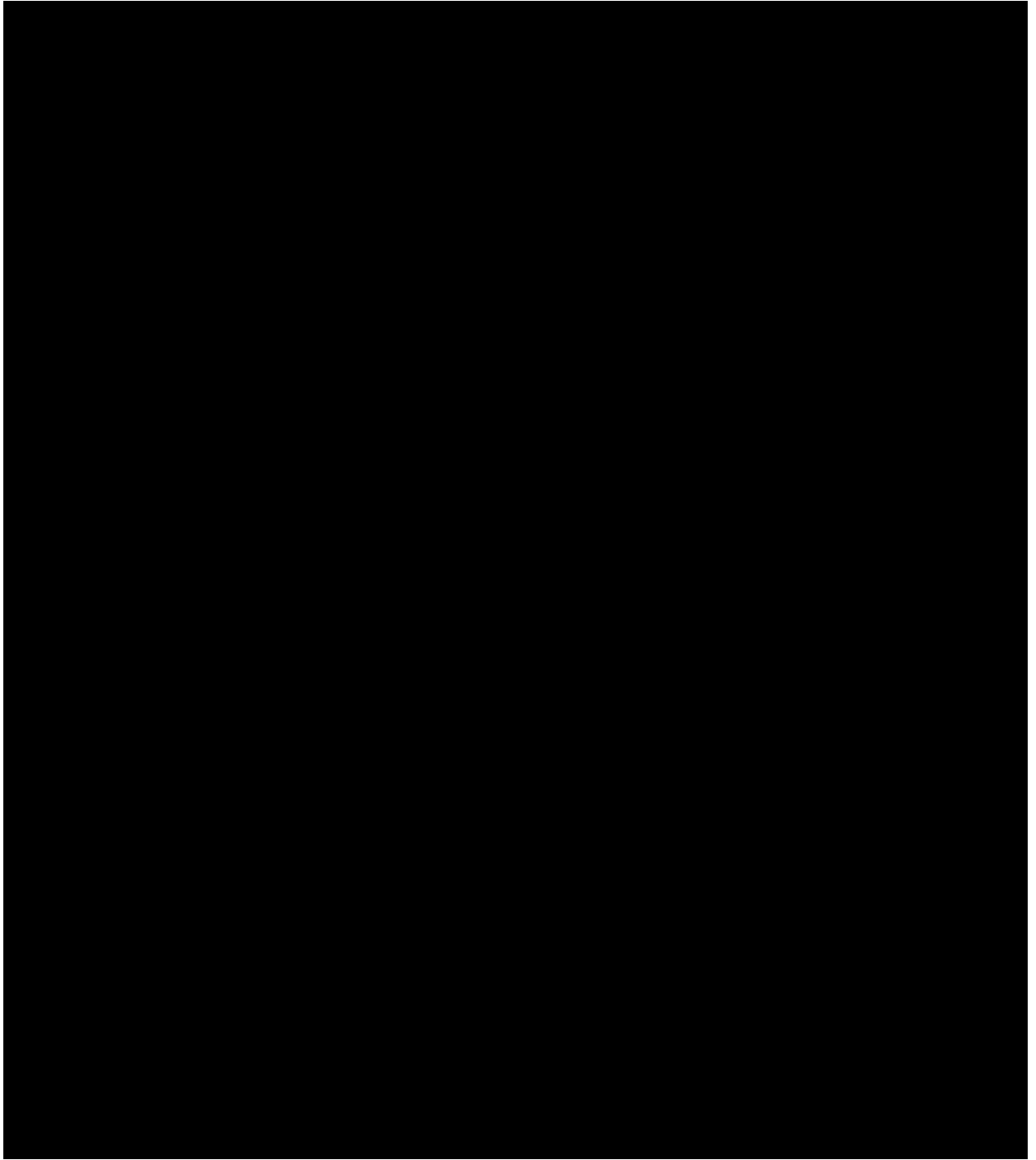
24 business. So it was just pure friendship,

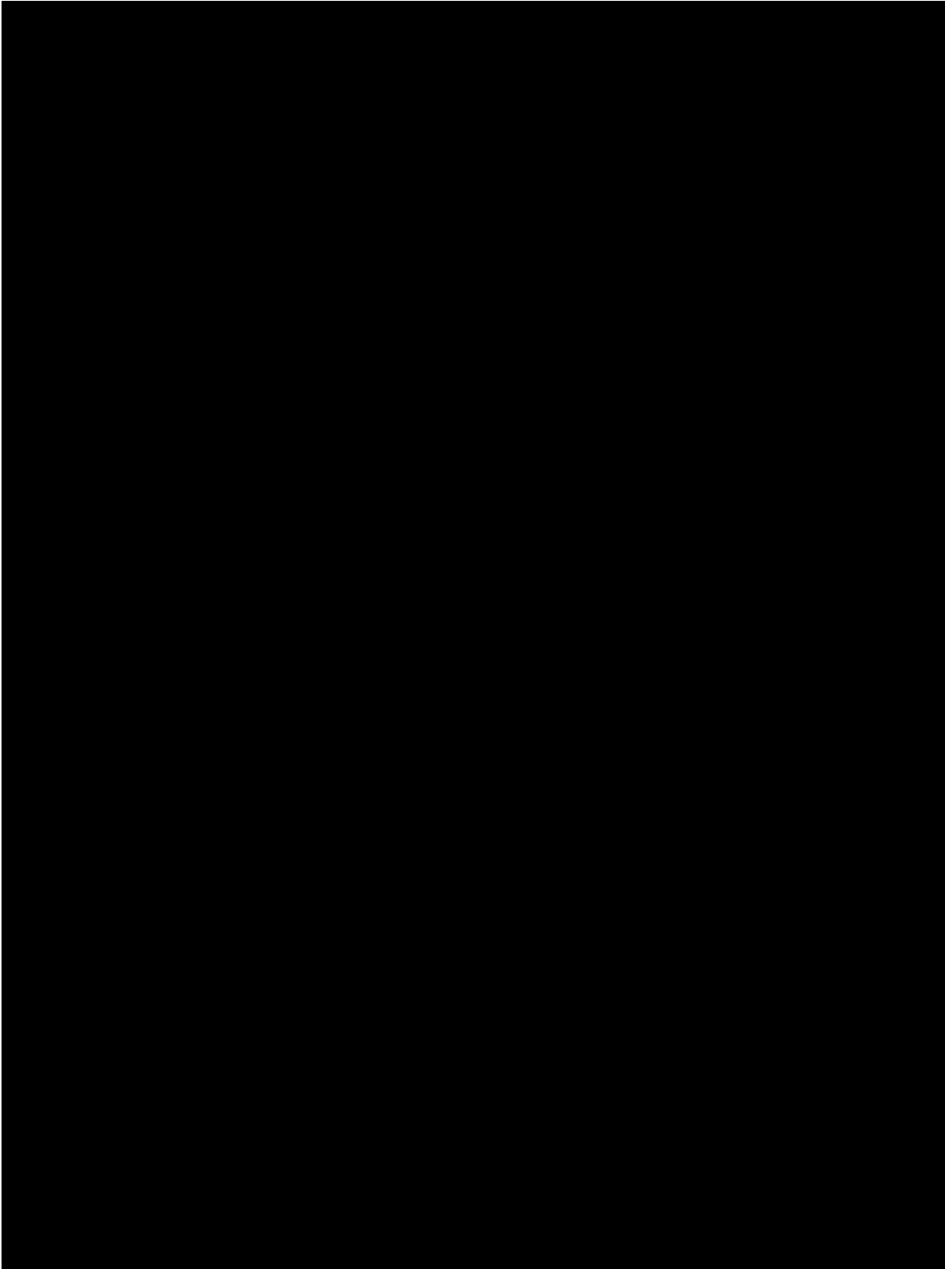
25 that is looking to help us get clients.

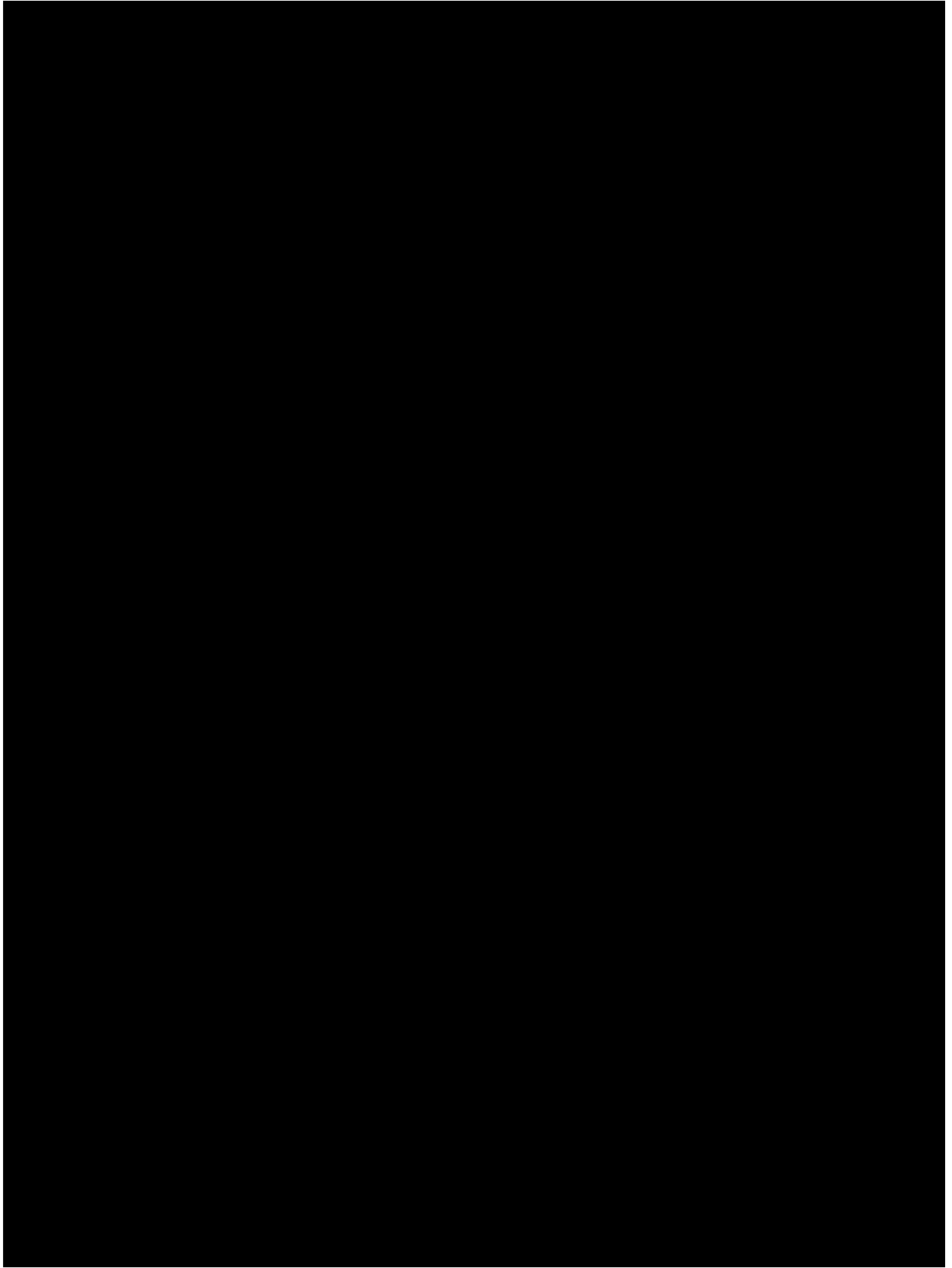
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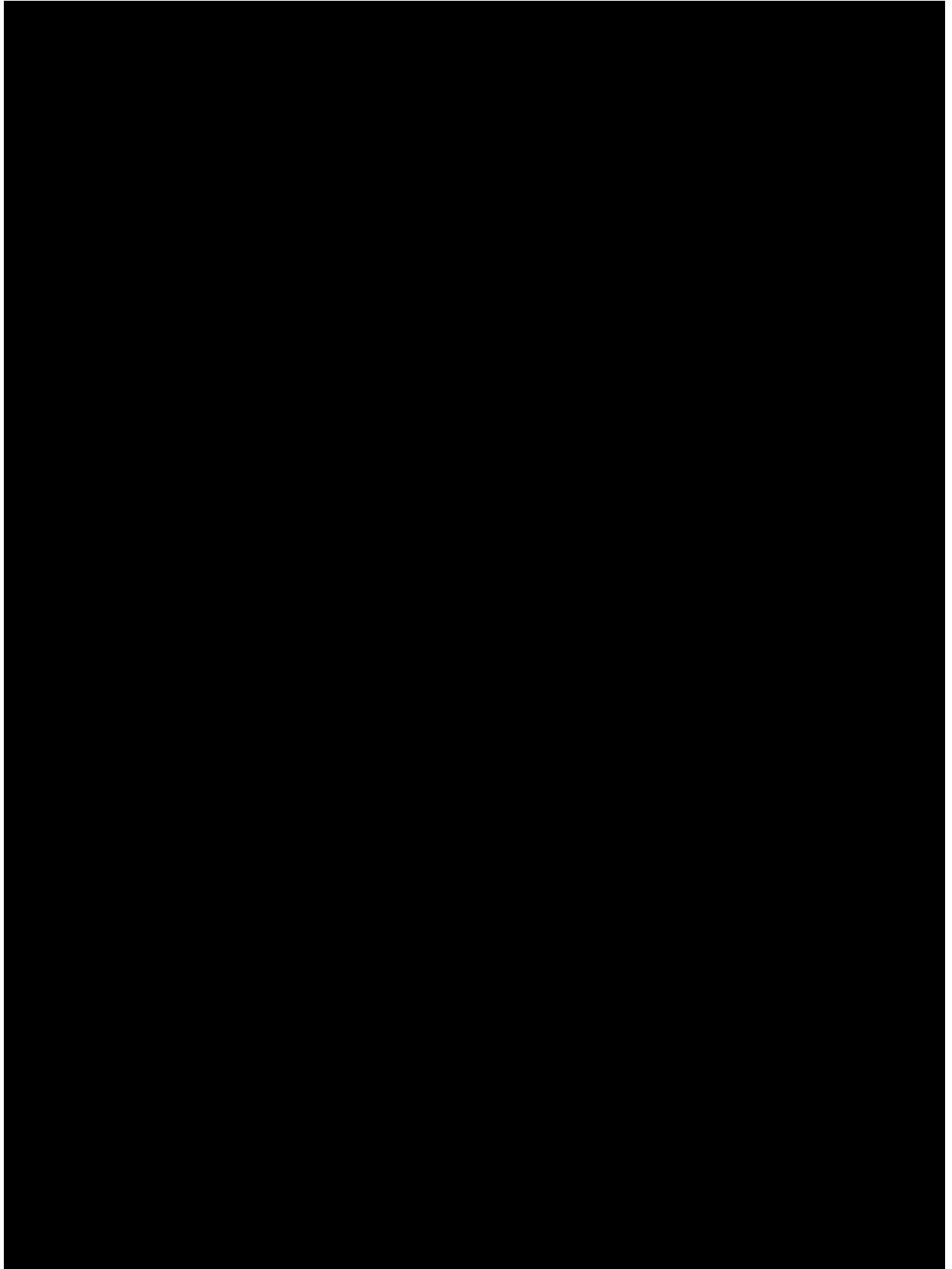
2 Q And do you know if Jack helped
3 Nick to get clients?

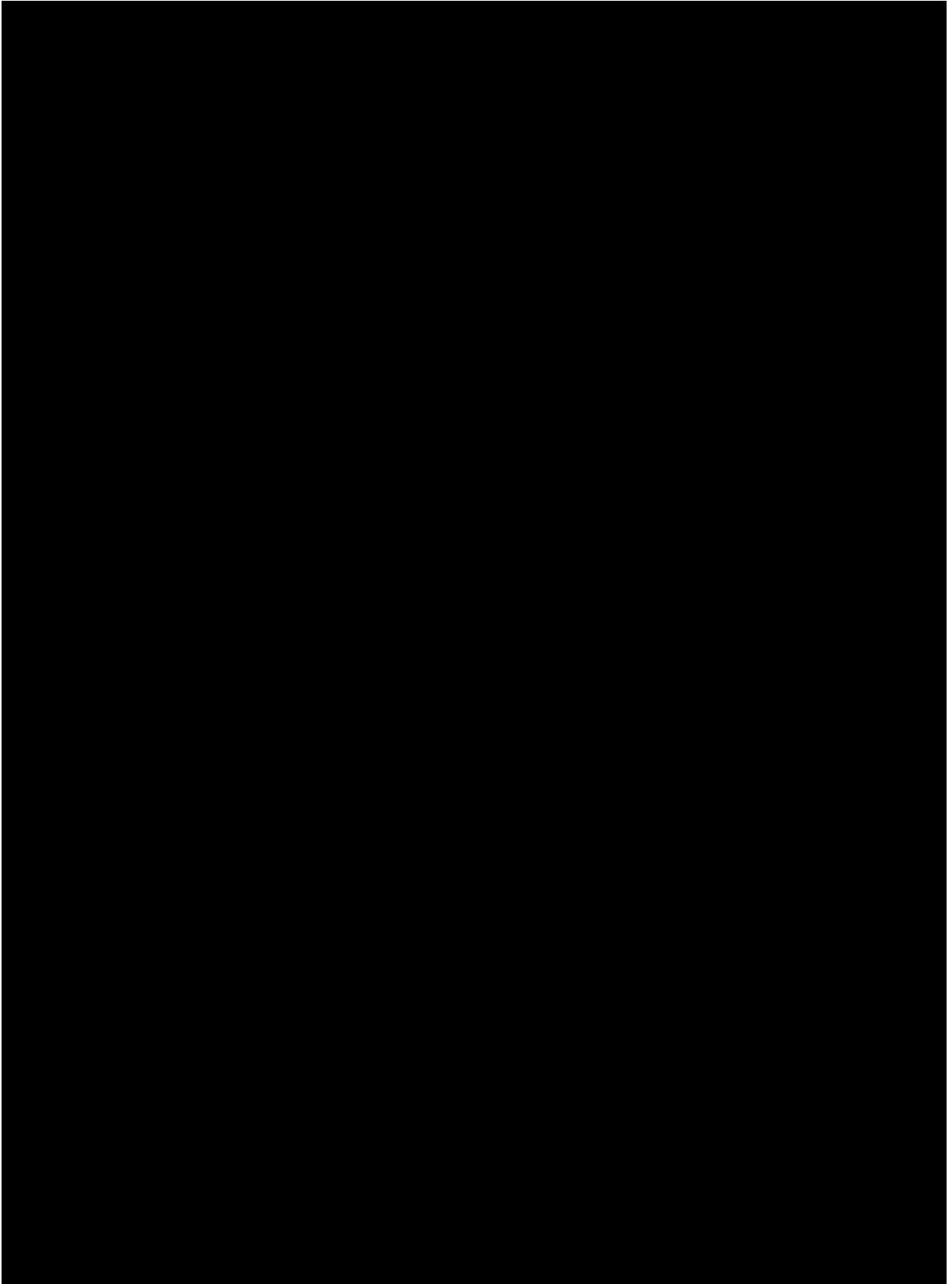
4 A I don't recall that he did, no.

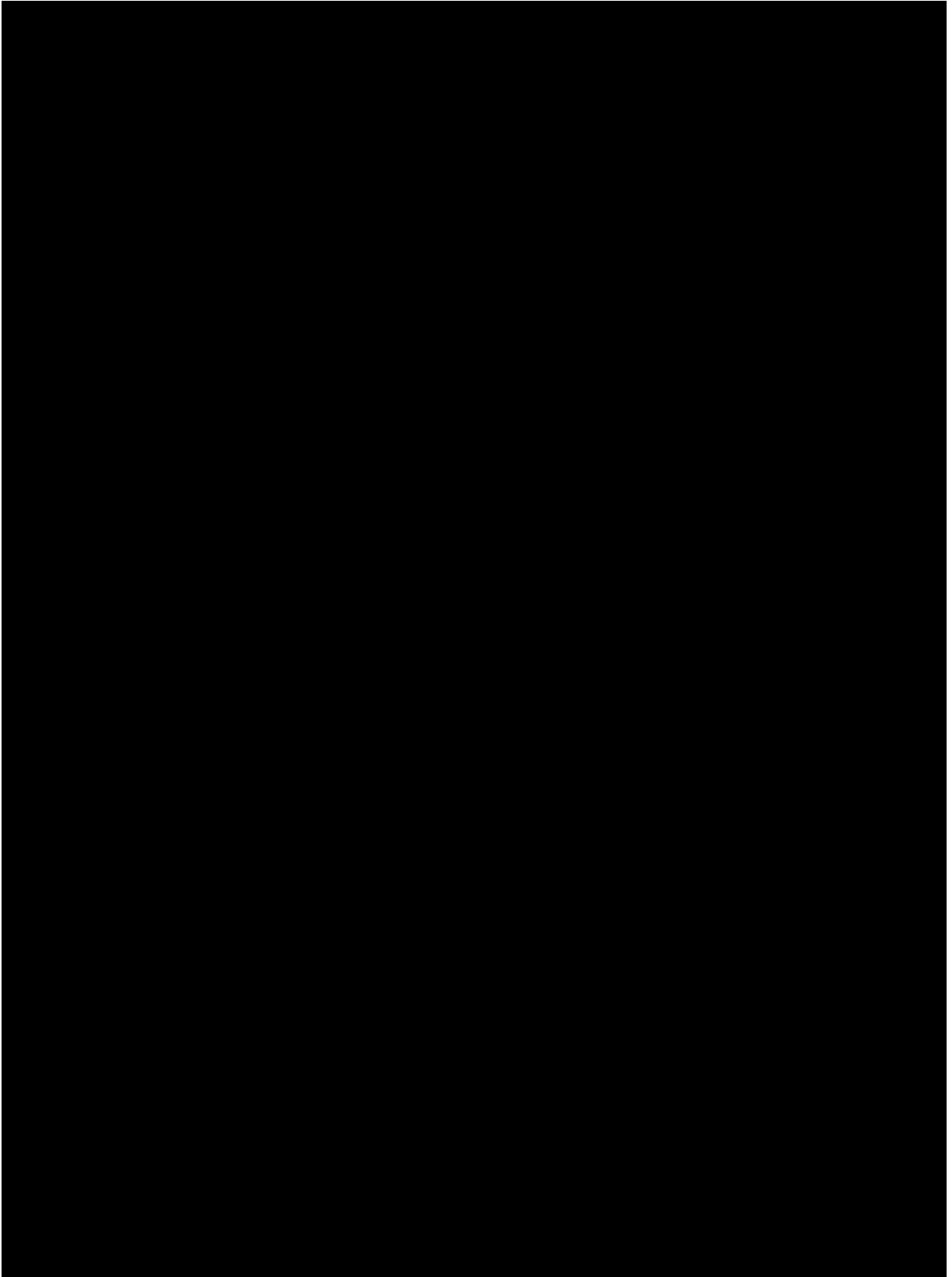


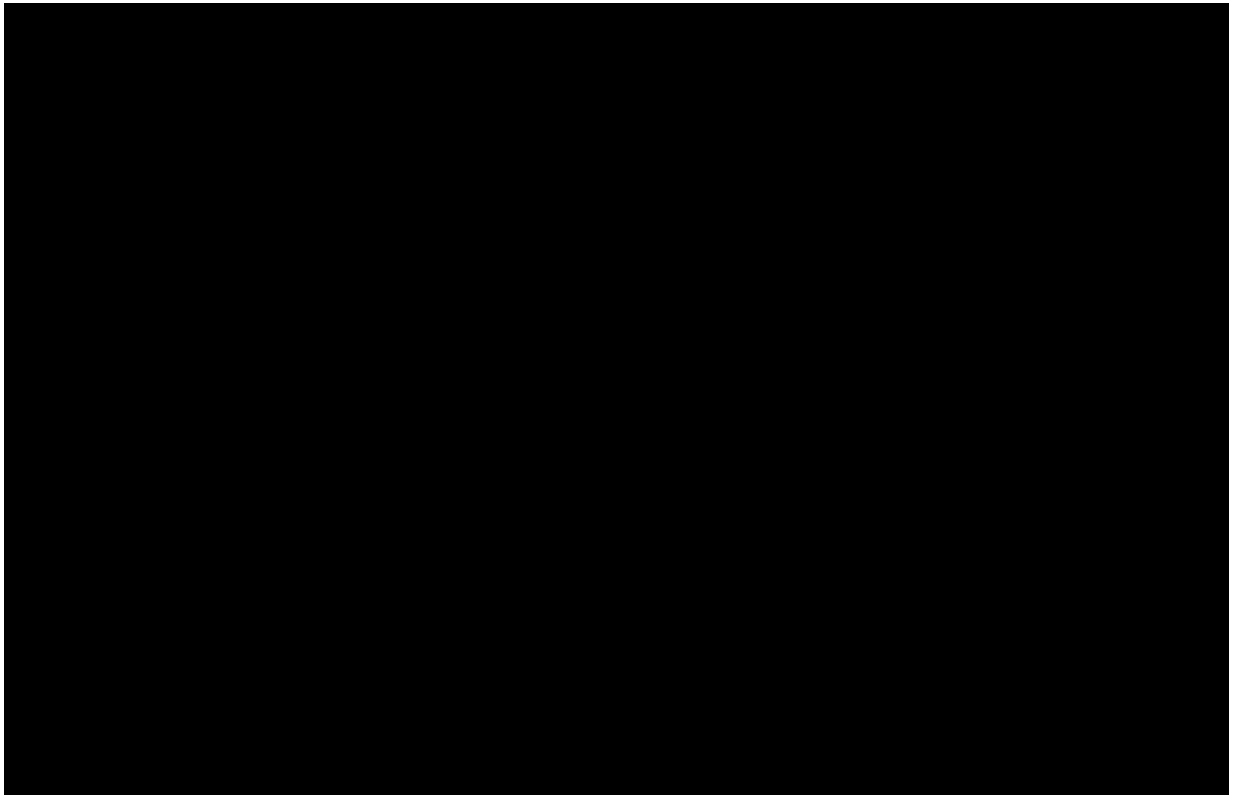










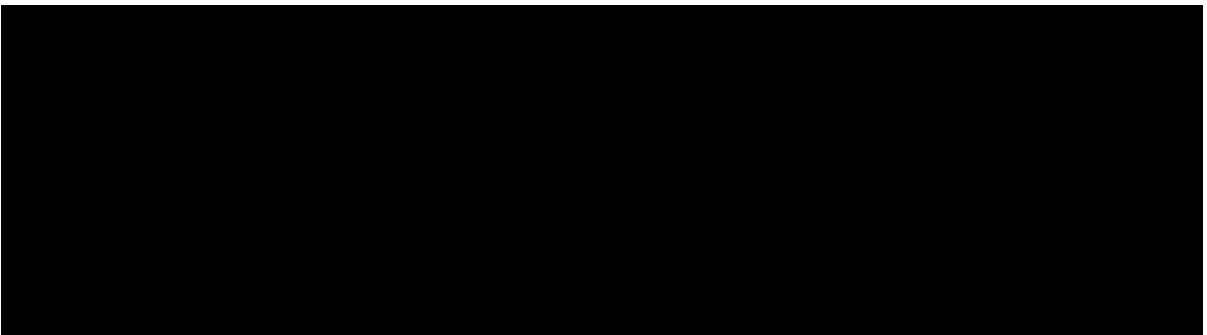


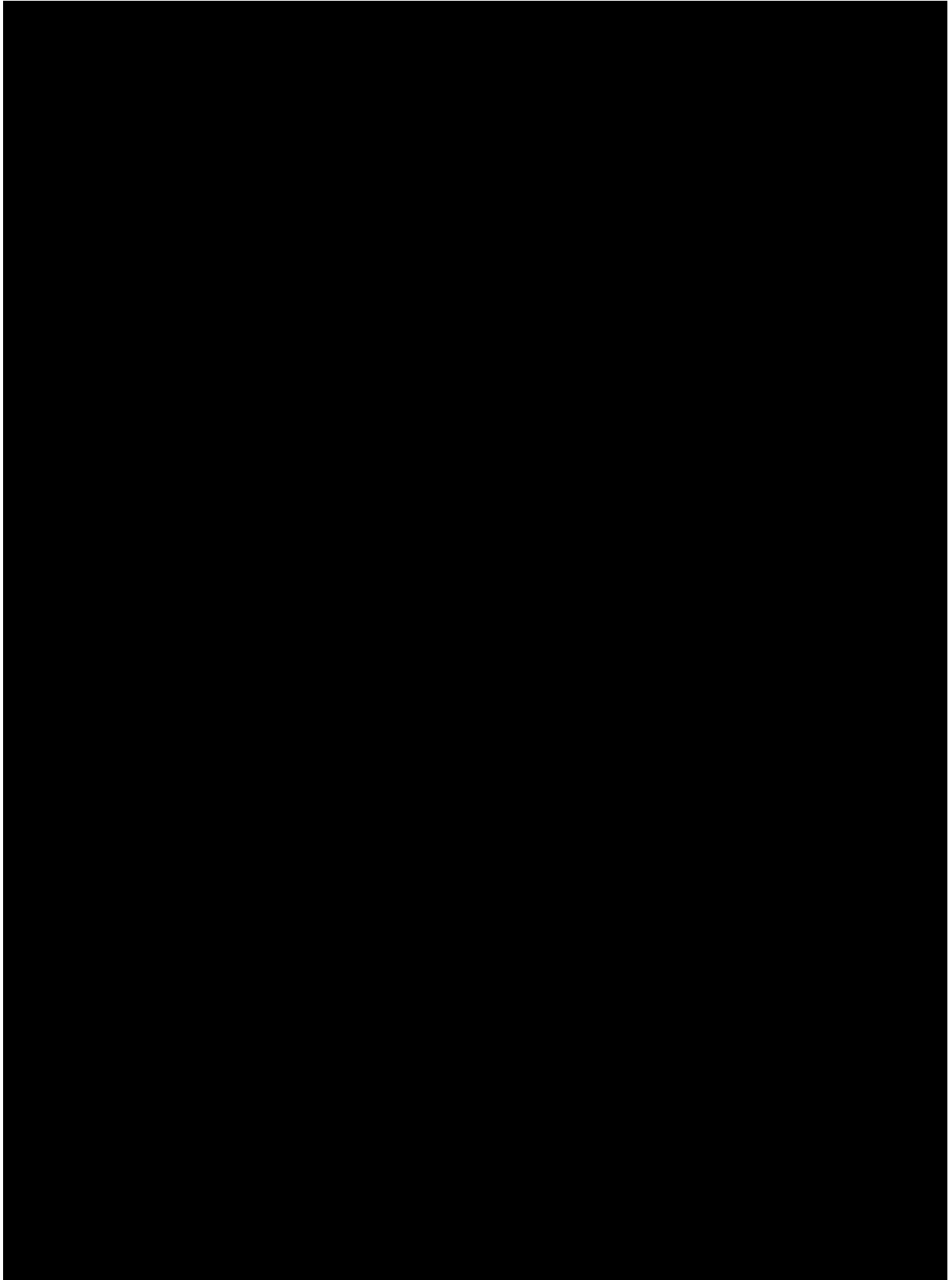
13 Q Do you know Michael Avenatti?

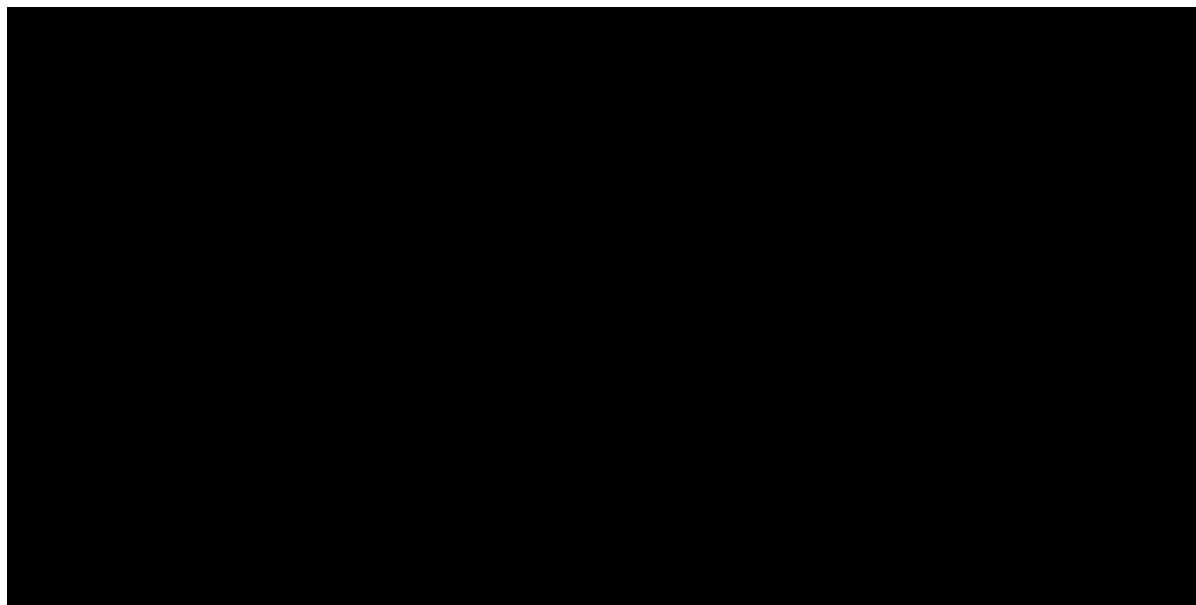
14 A I do not know him. I have seen
15 him on TV.

16 Q To the best of your
17 recollection, did you place or receive
18 phone calls using WhatsApp with Jamal
19 Benomar?

20 A Yes. I probably did.





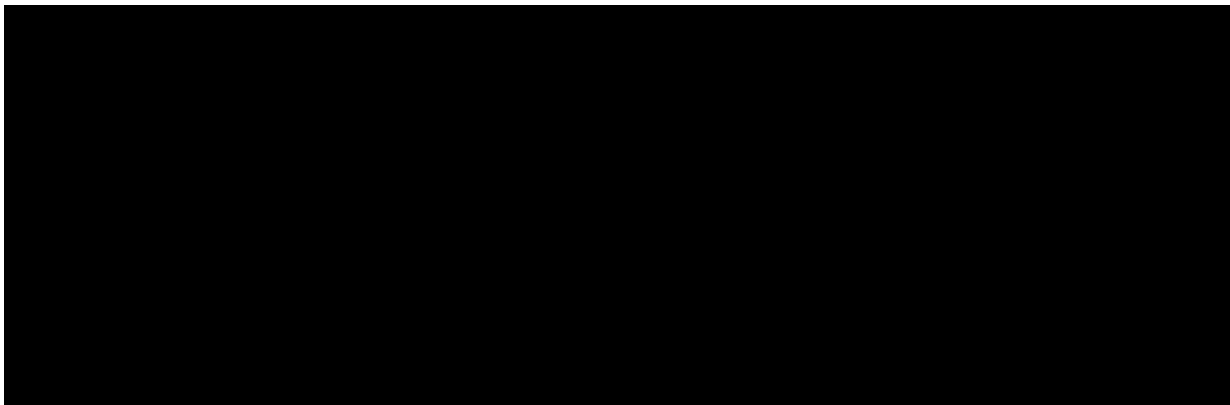


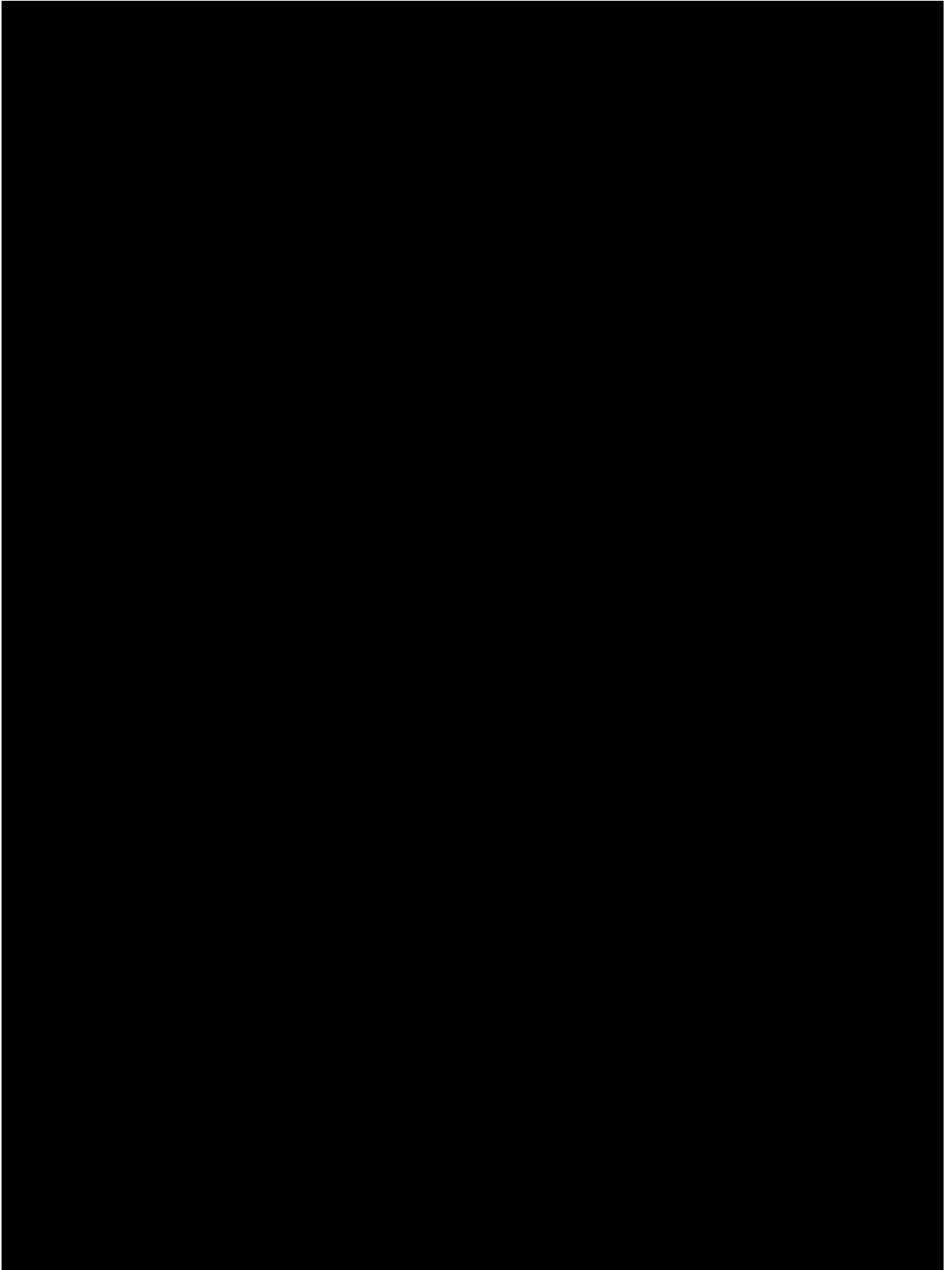
10 Q Did you speak to Mr. Klein
11 regularly by telephone?

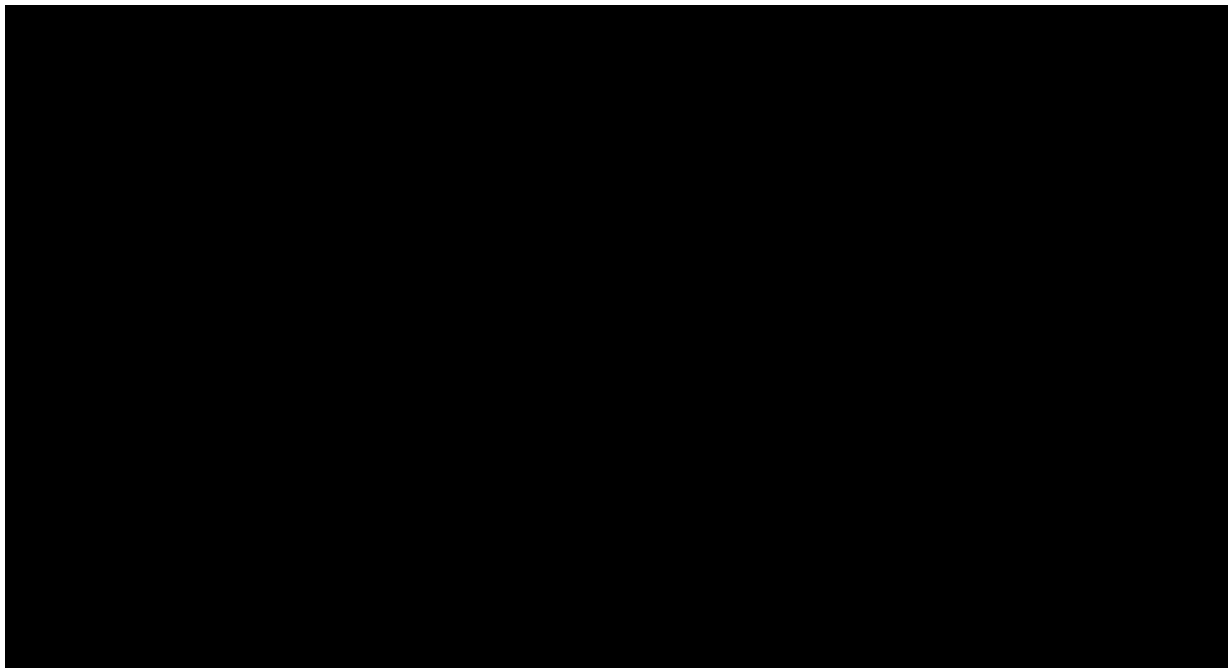
12 A Yes.

13 Q What were the subject matters of
14 your discussions?

15 A Mort likes to call every hour,
16 and it's always anything to do with,
17 honestly, Israel-related-type-of-thing.
18 It is all about -- mostly about Israel and
19 his organization.







11 Q And when you spoke with Mort
12 Klein about his decision to reach --
13 release a negative statement about Qatar
14 on June 6, 2018, did you also tell
15 Mr. Klein that you would be cutting your
16 ties with Qatar?

17 A Cutting my ties with Qatar was
18 probably around the same time. I mean
19 that reason was part of the break up.

20 Q And did you tell Mr. Klein that
21 part of the reason why you were cutting
22 your ties was because you did not receive
23 payments that you thought you were
24 entitled to?

25 A That was not -- again, that was

1 Allaham - ATTORNEYS' EYES ONLY

2 not the reason really. Just my job was
3 done. I wanted to be out way before.

4 Q Did you discuss that with
5 Mr. Klein?

6 A No, I don't recall that.

7 Q Did you discuss that with Mr.
8 Muzin?

9 A I don't -- it's not -- that was
10 my decision. You saw my text from
11 February, I was asking to -- I gave my
12 notice.

13 Q Around the same time as both you
14 and Mr. Klein cut your ties with Qatar,
15 Mr. Muzin did the same, correct?

16 A I believe he did it.

17 Q Did you discuss with Mr. Muzin
18 his decision to cut his ties with Qatar?

19 A I mean he expressed to me that
20 he was also going to do it.

21 Q Did he say why?

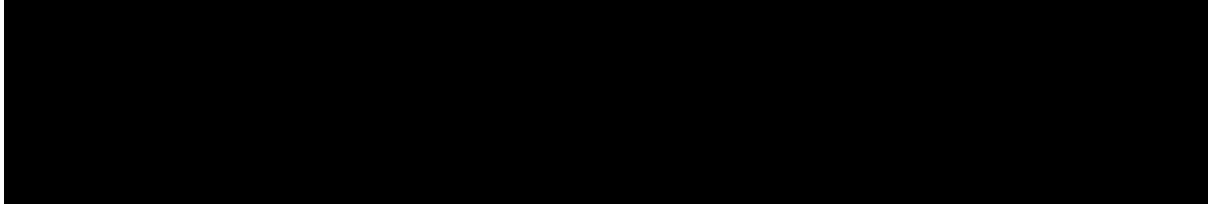
22 A I'm not sure. I mean -- I was
23 not involved in his discussions with the
24 embassy.

25 Q It was a good contract for him,

1 Allaham - ATTORNEYS' EYES ONLY

2 wasn't it?

3 MS. YUSUF: Objection.



7 A Again, this is not a question

8 I'm going to answer for Nick.

9 Q Did you discuss with him his
10 reasons for terminating his contract with
11 Qatar?

12 A No, I'm not.

13 Q Are you aware of the reasons why
14 he terminated his relationship with Qatar?

15 A I can't comment on it because I
16 don't want to speculate on why. He
17 never -- I was not really in the loop of
18 the embassy and meetings and stuff.

19 Q Do you know if it was his
20 decision to sever his relationship with
21 Qatar?

22 A Or?

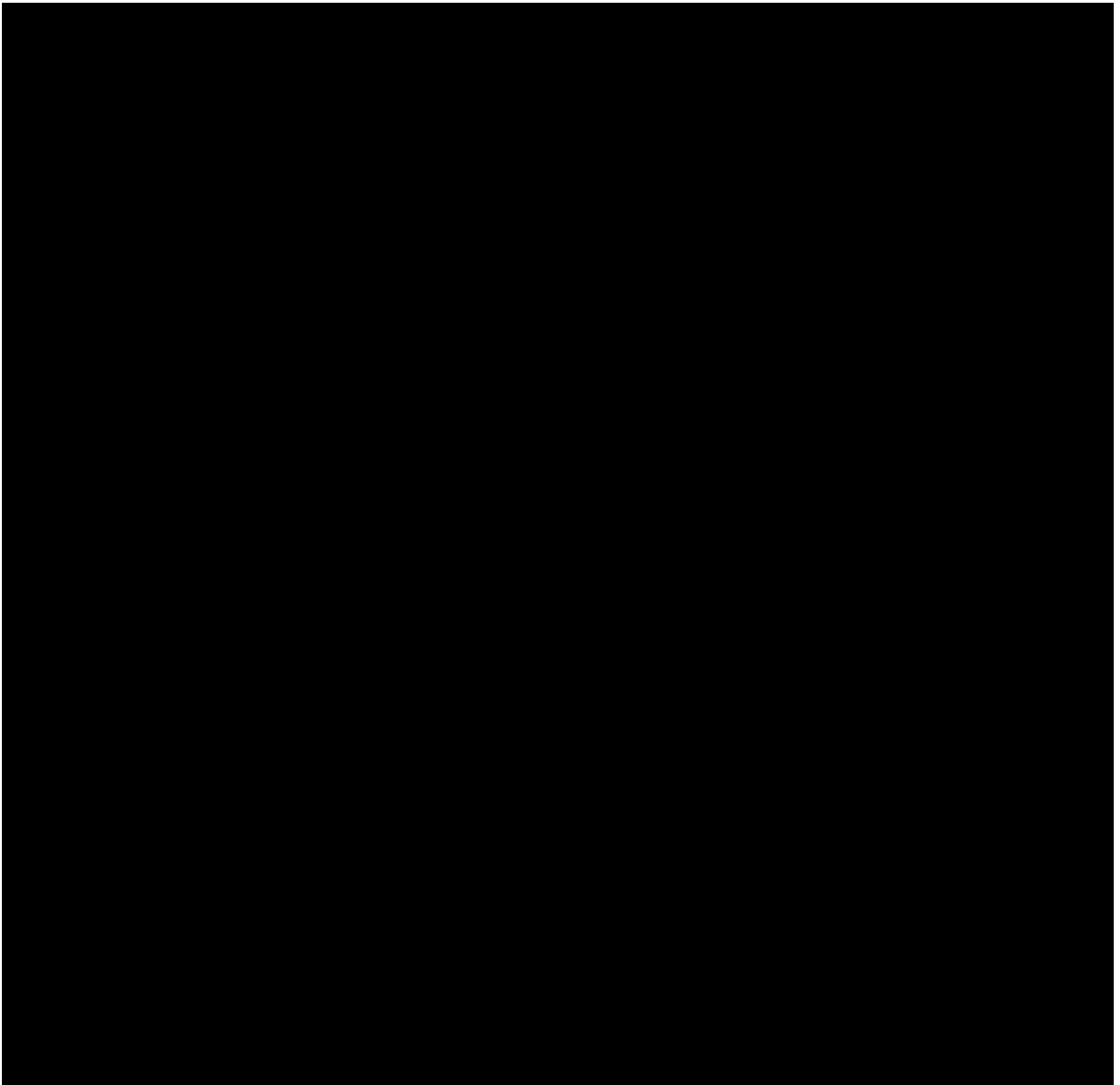
23 Q Or Qatar's decision to sever its
24 relationship with him?

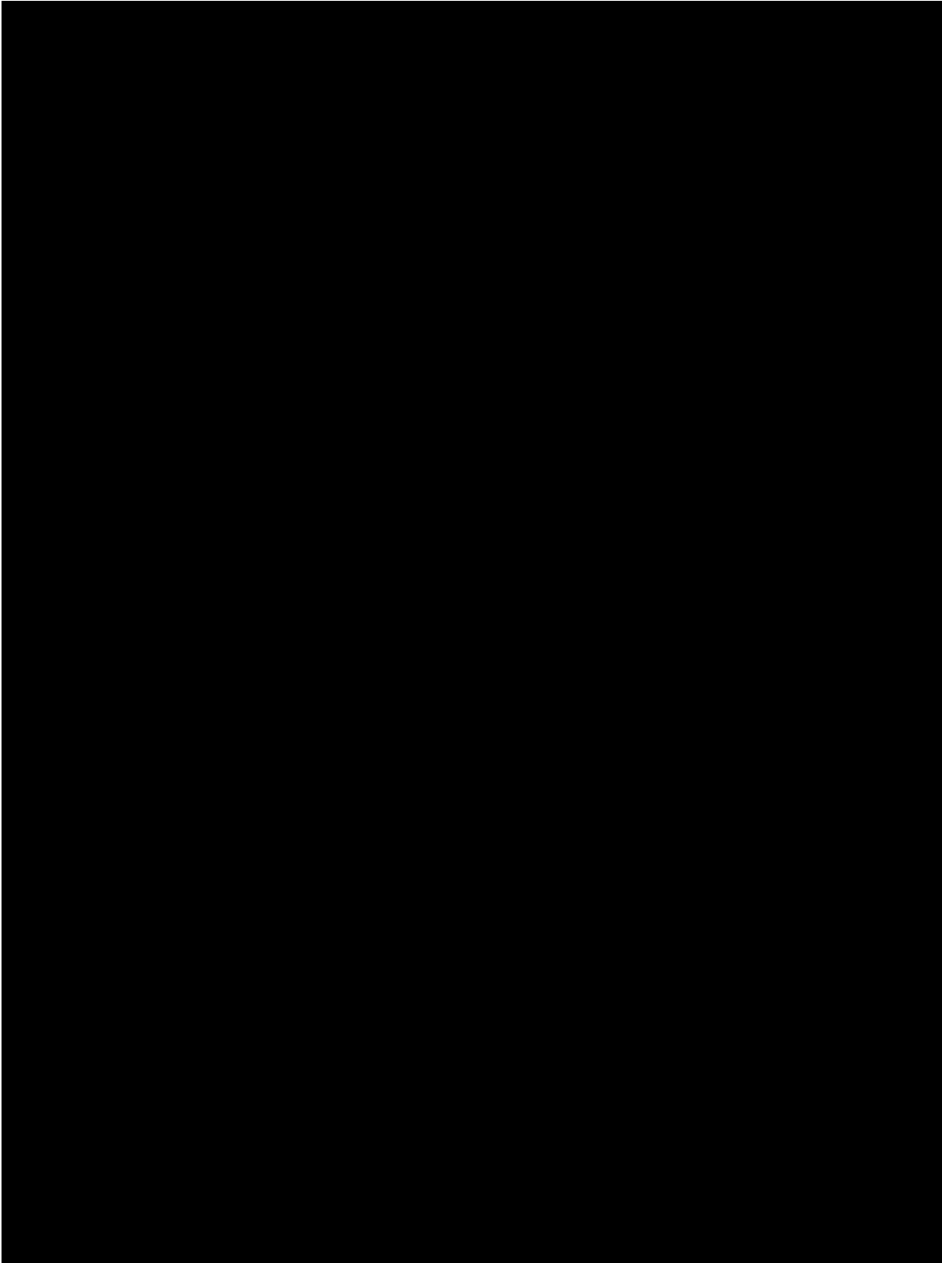
25 A I think it is clear that he put

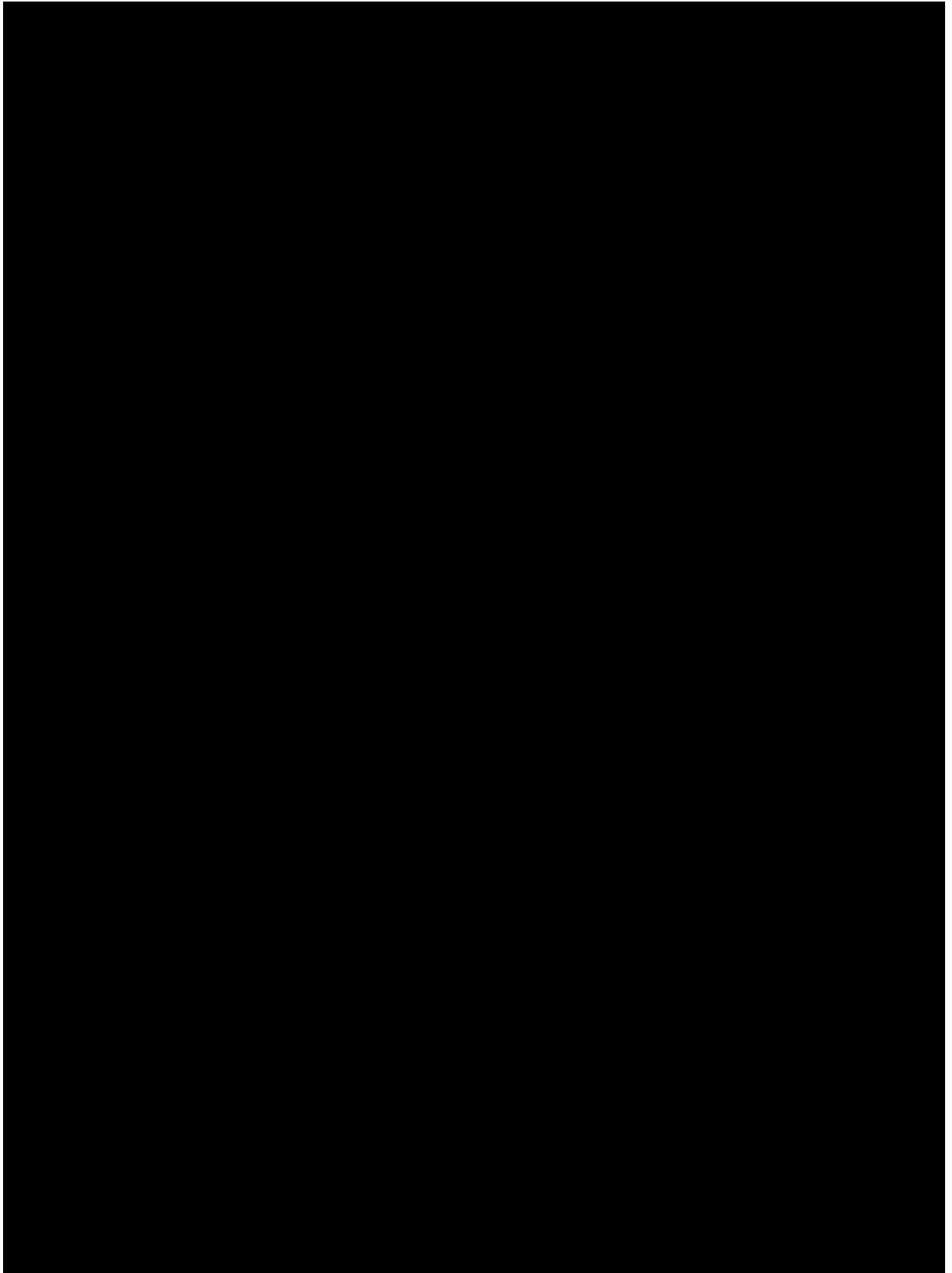
1 Allaham - ATTORNEYS' EYES ONLY
2 out, that's not for me to answer. I think
3 Qatar should answer or Nick should answer
4 for that.

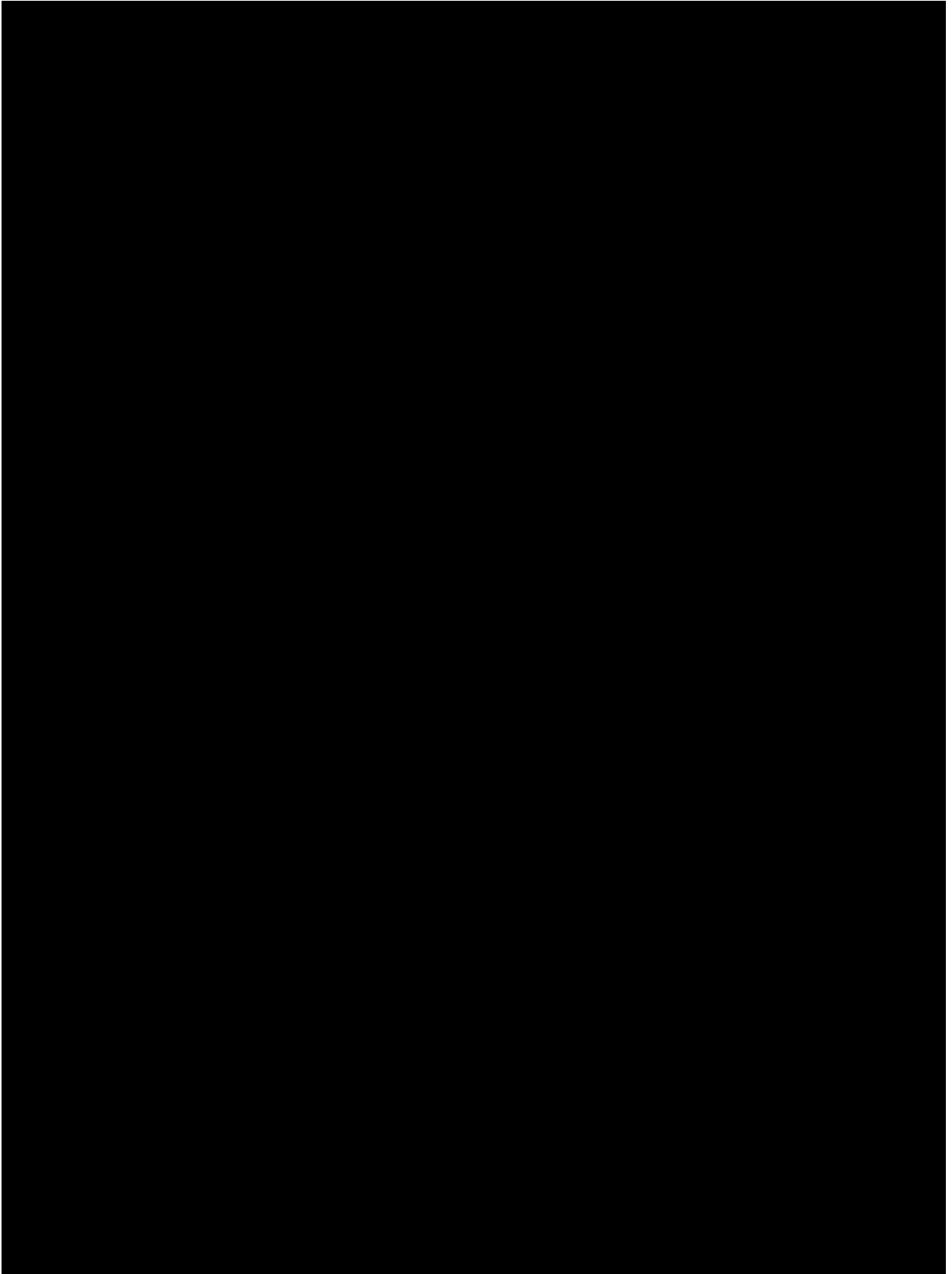
5 Q But are you aware of the
6 reasons?

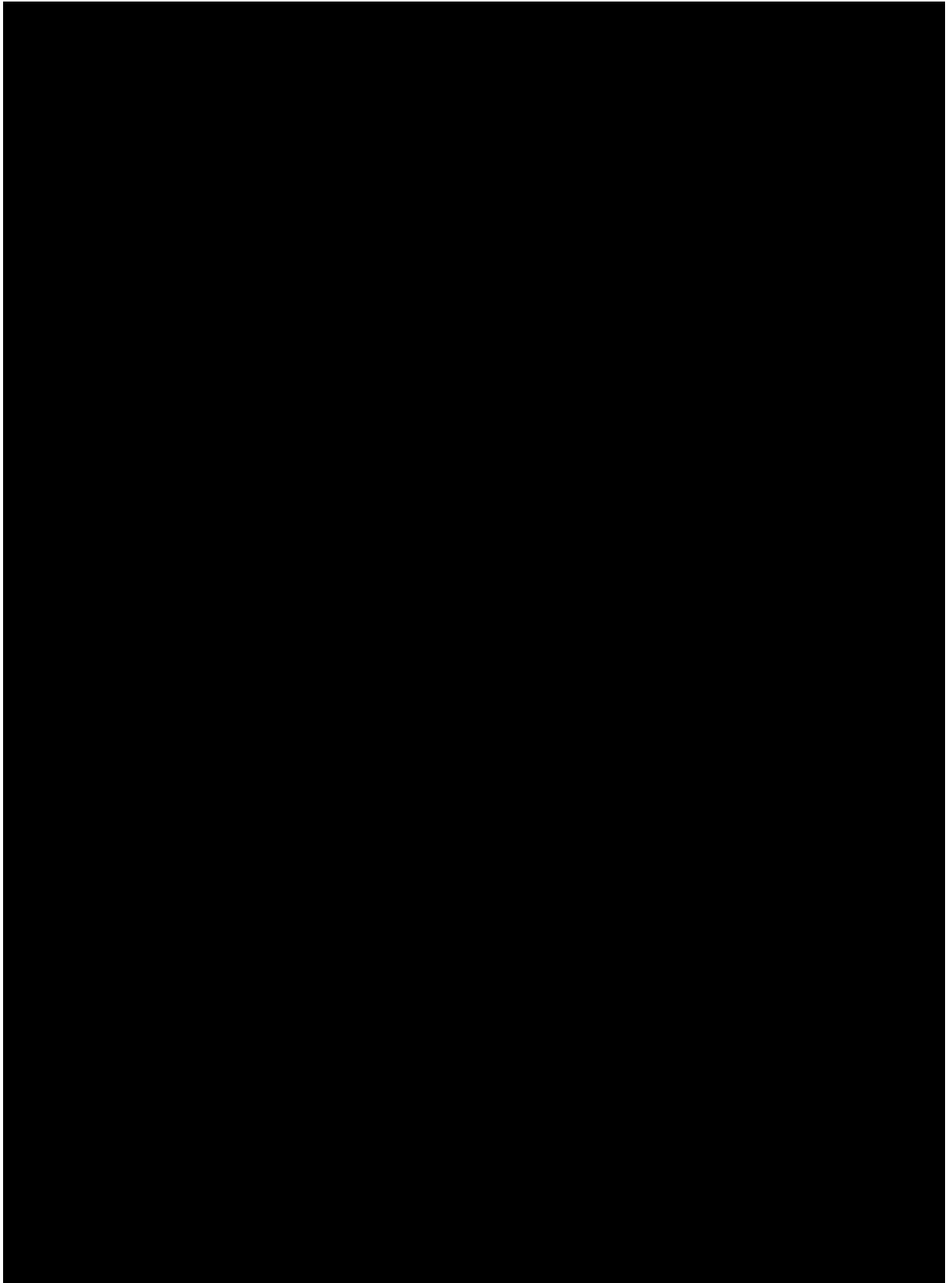
7 A No, I'm not.

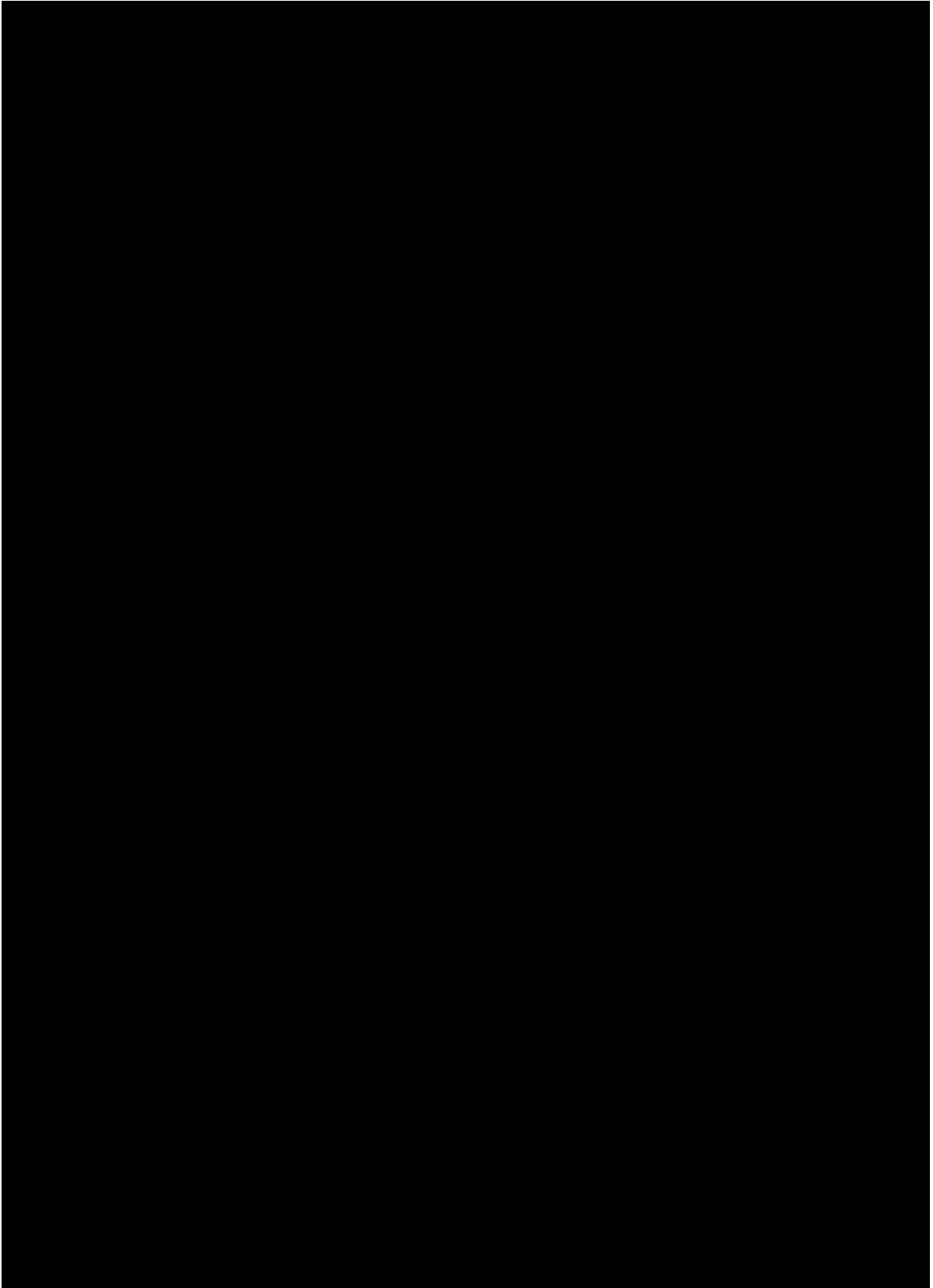


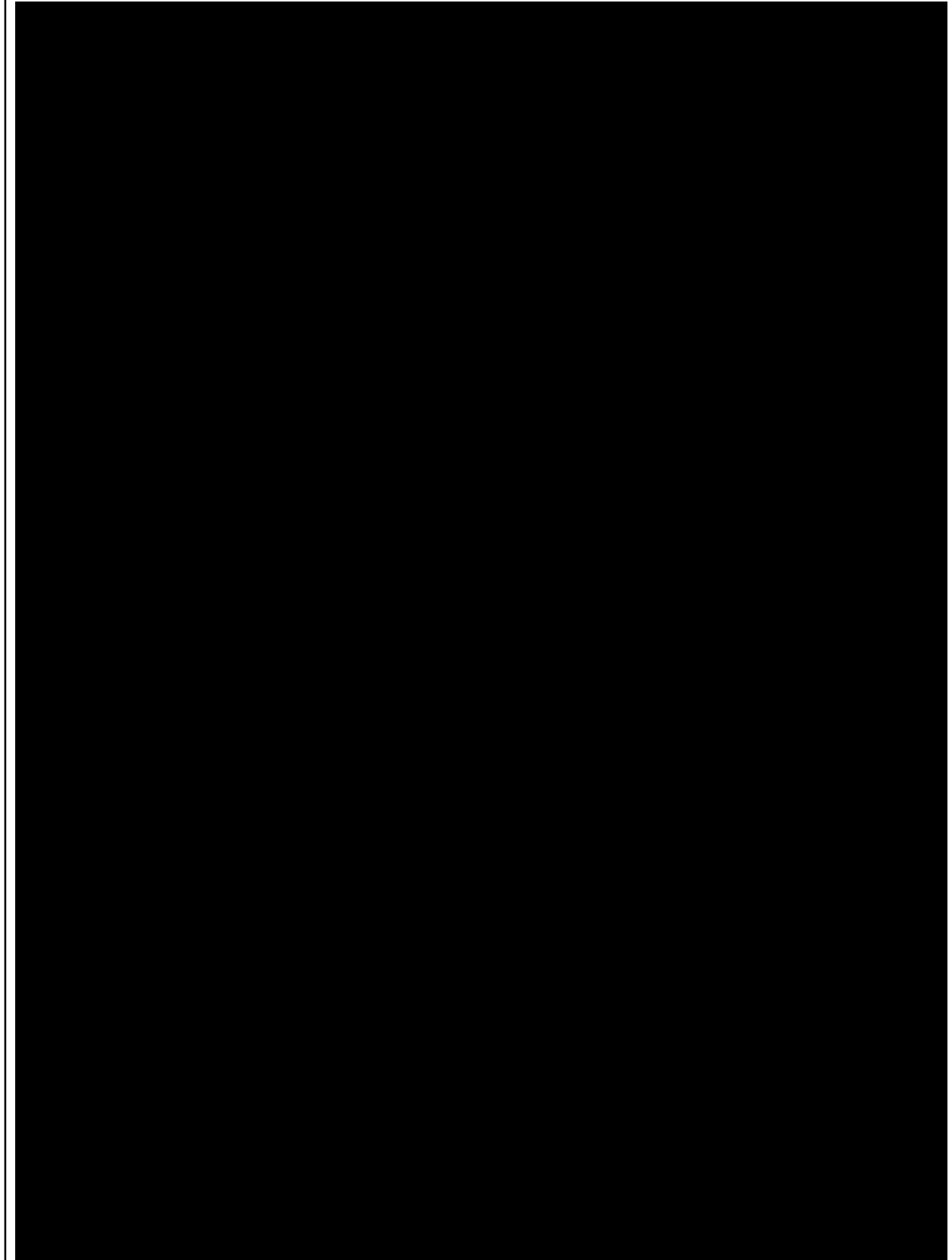


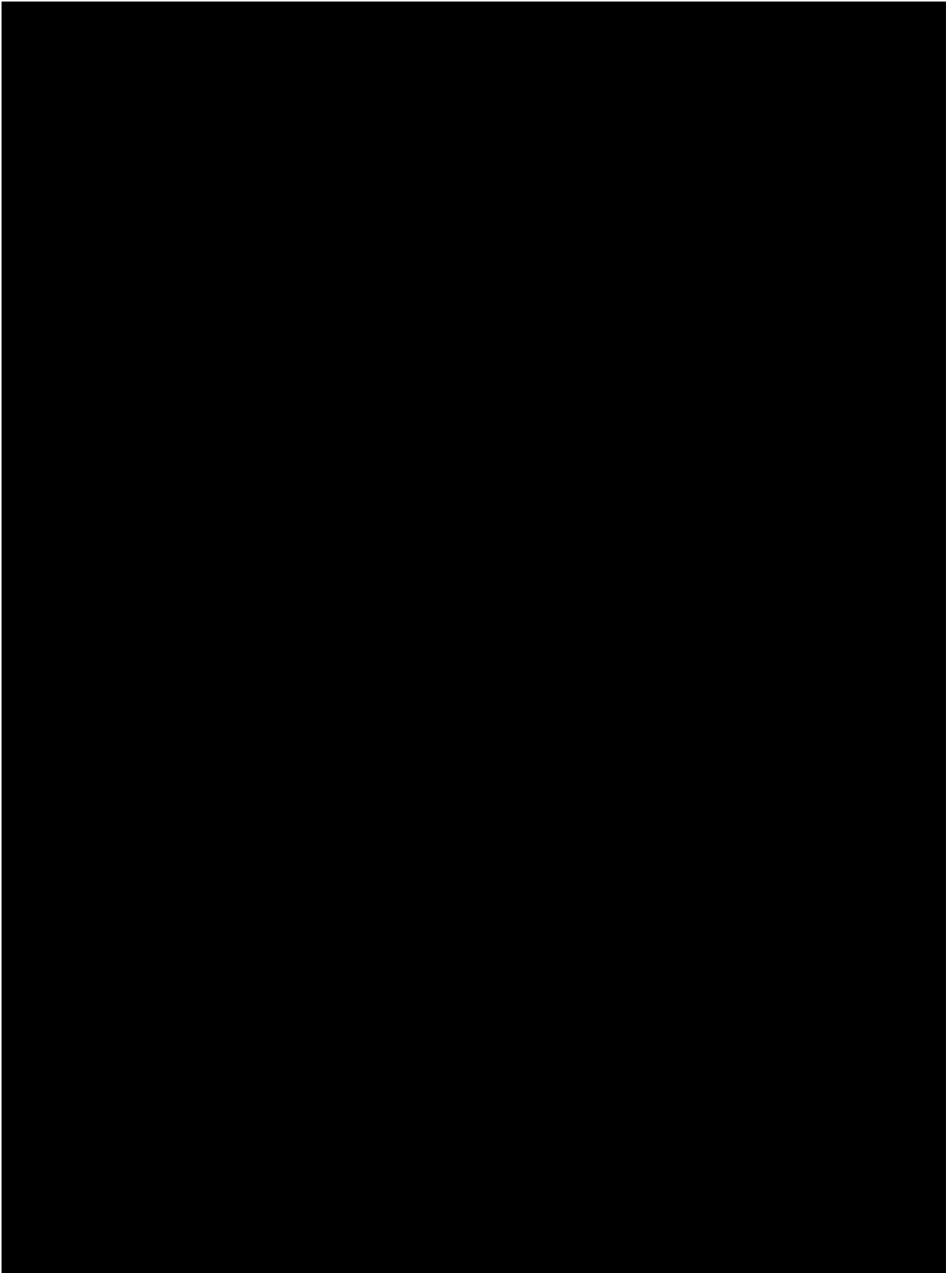


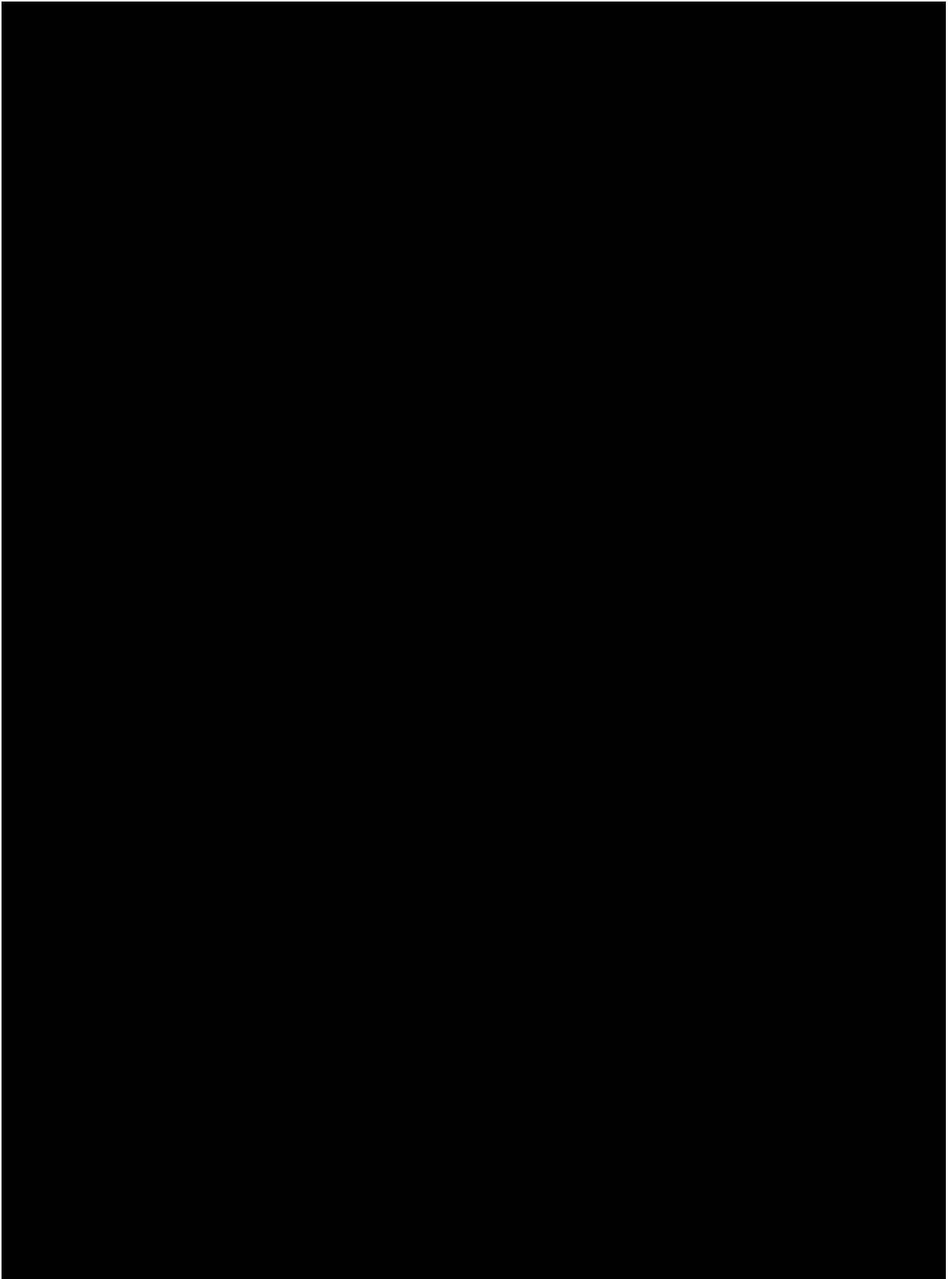


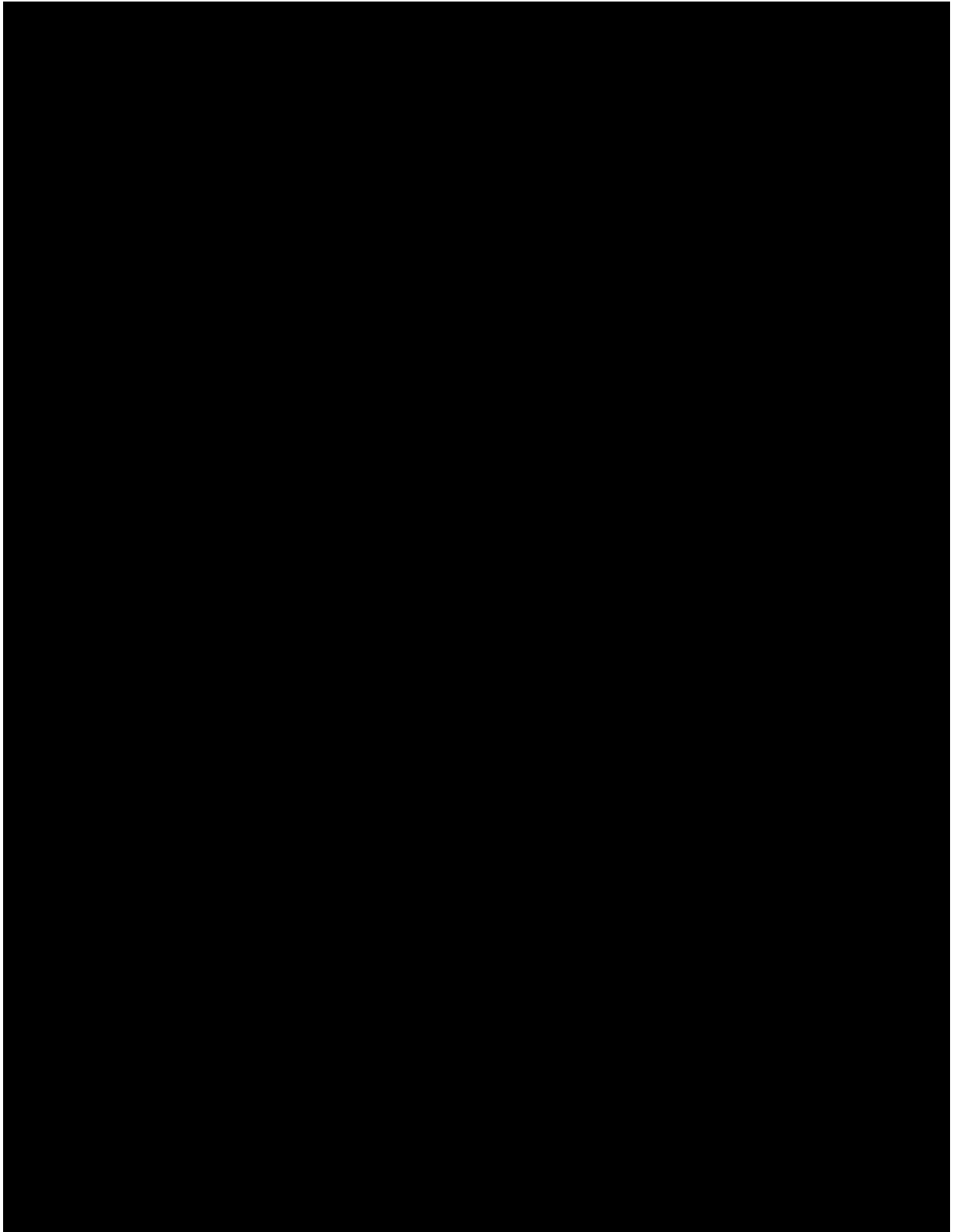












25 Q Are you paying for your

1 Allaham - ATTORNEYS' EYES ONLY

2 attorneys?

3 A Yes.

4 Q Do you have an agreement with
5 any party to reimburse or indemnify your
6 legal fees?

7 A No.

8 Q I'm going to take you through
9 some of the text messages that you
10 exchanged, WhatsApp messages you exchanged
11 with various parties. We have been
12 through a lot of them already. This is at
13 Exhibit 19.

14 Sorry, Exhibit 5, yes.

15 A You need the coffee.

16 Q I do. I need different tabs as
17 well.

18 So let's start quickly and we'll
19 go through this. The document that's
20 Bates stamped 24.

21 A Page 24, yes.

22 Q Page 24.

23 Do you see that?

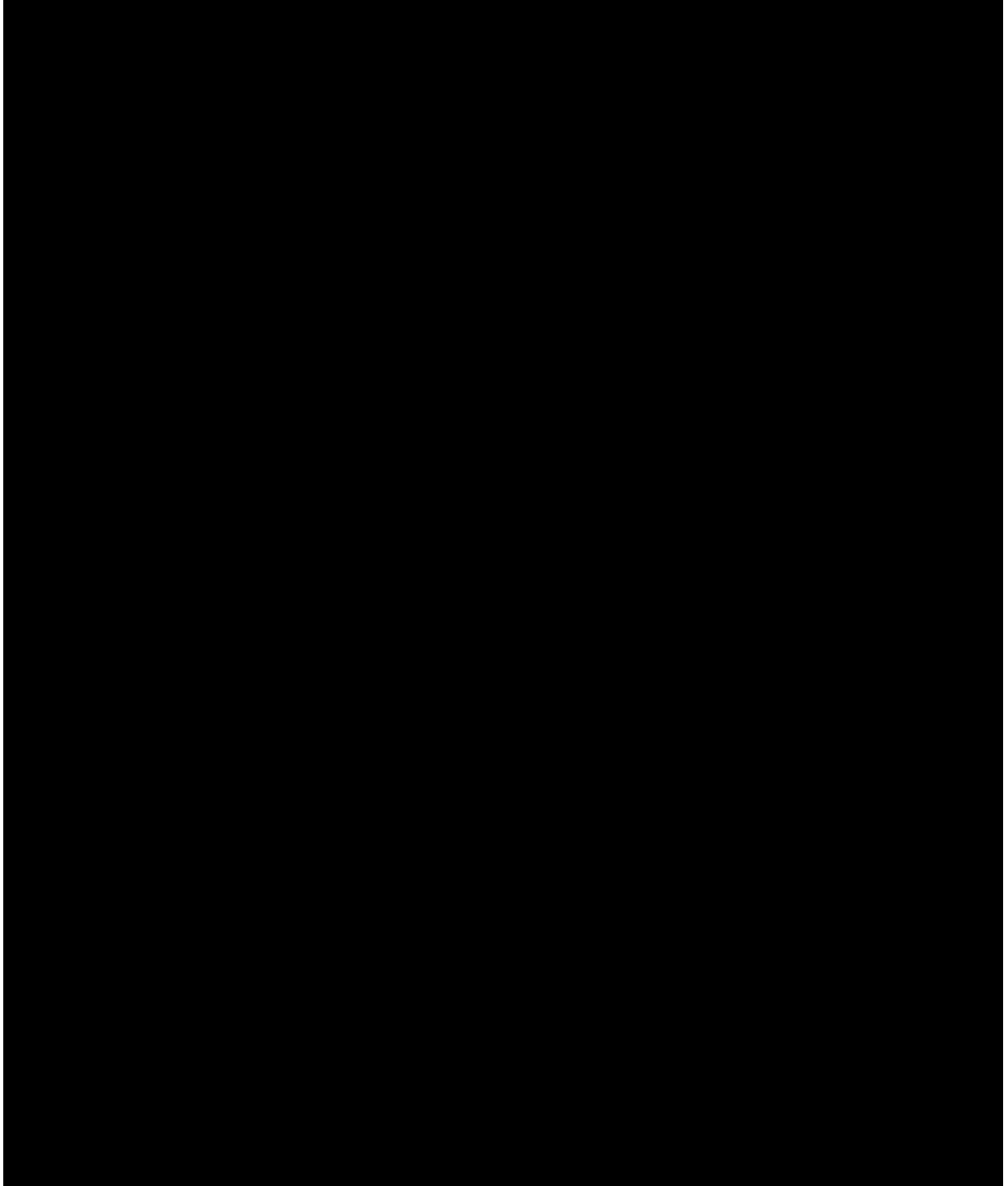
24 A Yes.

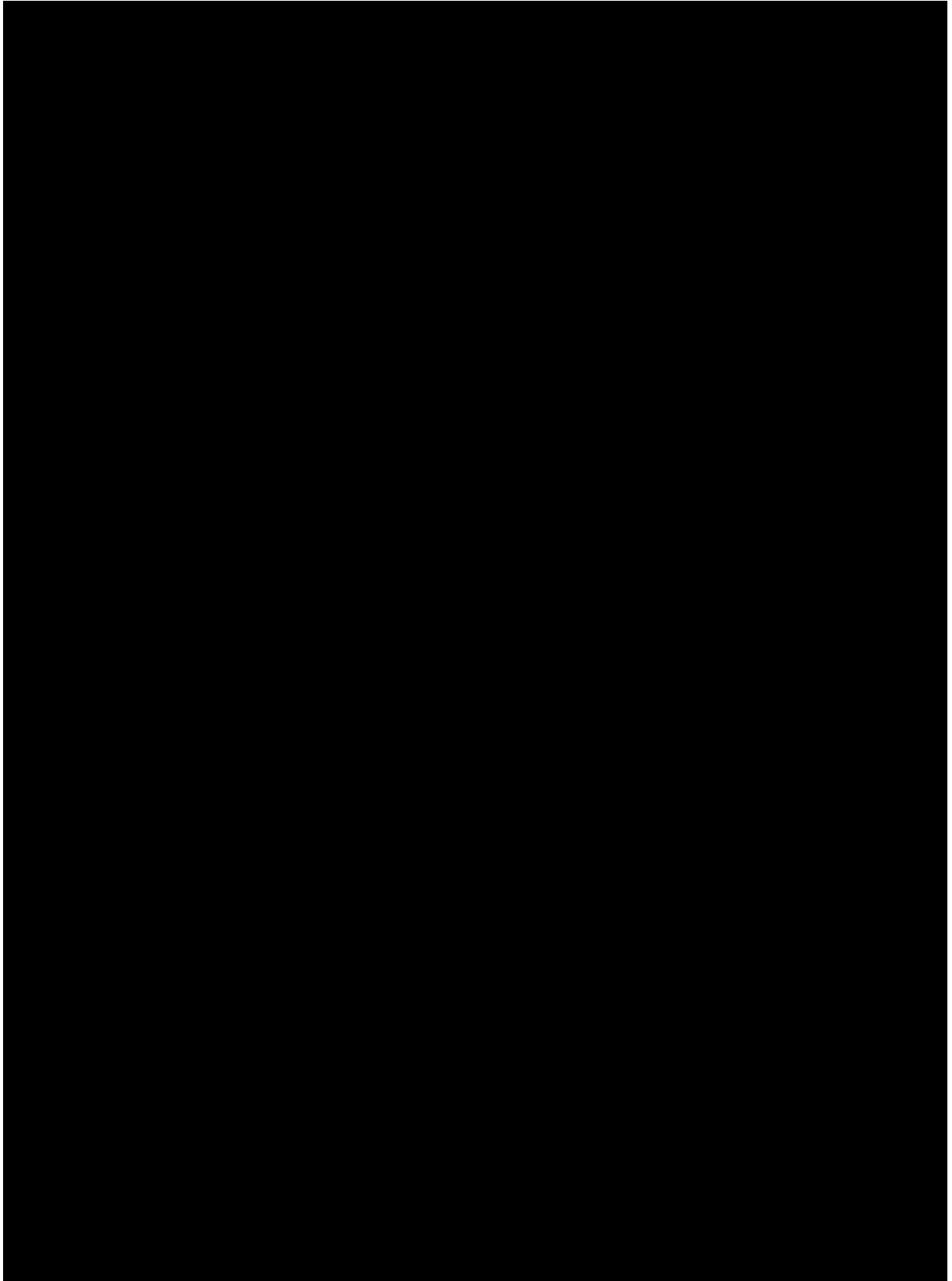
25 Q And we talked about this page

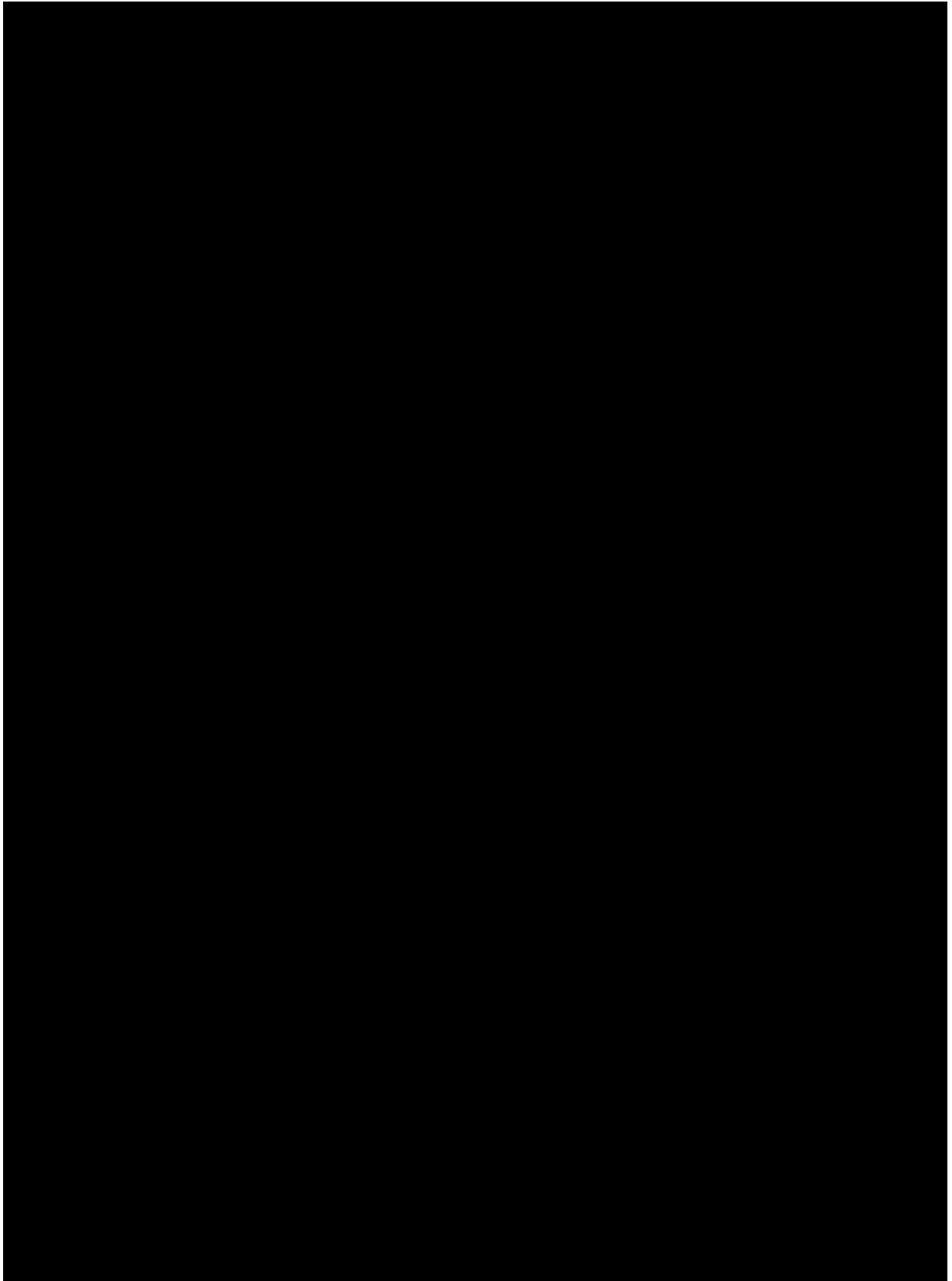
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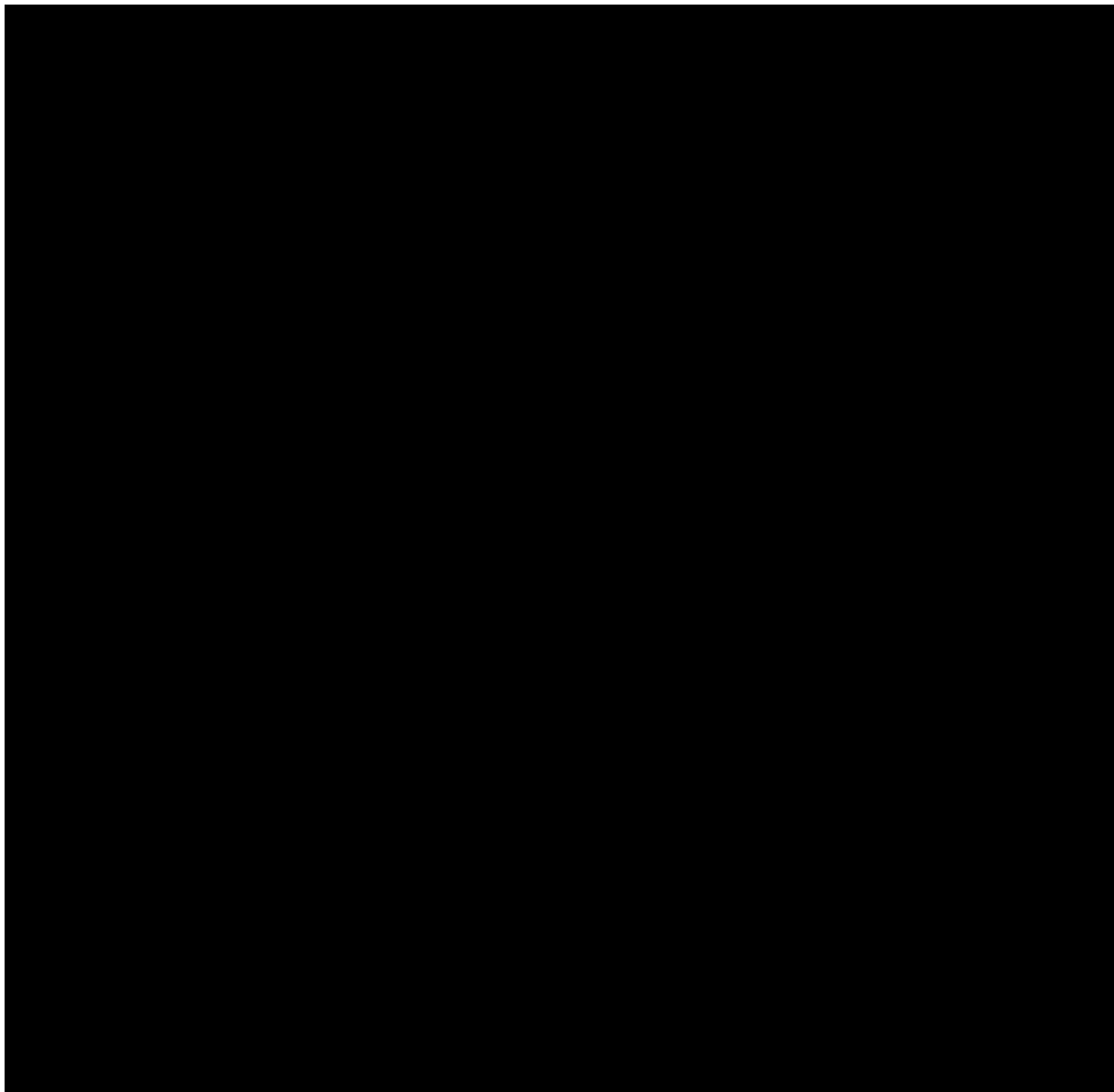
2 already.

3 A Yes.









19 Q Now, on the next page which is
20 Bates stamped 28.

21 A Yes.

22 Q Do you see there are e-mails --
23 excuse me, WhatsApp messages that refer to
24 Broidy Capital. It is a message from Nick
25 Muzin to you, December 7, 2017, at 9:42

1 Allaham - ATTORNEYS' EYES ONLY

2 a.m. It is the third from the bottom.

3 Do you see that?

4 Broidy Capital is his company.

5 A Yes.

6 Q And then you respond, "He is, he
7 one."

8 Do you see that?

9 A Yes.

10 Q What does that mean?

11 A Meaning, I remember that Nick
12 was having a hard time getting -- he got
13 disinvited to the Vegas event.

14 Q And what is the Vegas event?

15 A I think the Republican
16 National -- RNC.

17 Q Why did he get disinvited from
18 the Vegas event?

19 A I have no idea.

20 Q Did he believe that Broidy got
21 him uninvited to the Vegas event?

22 A I have no idea.

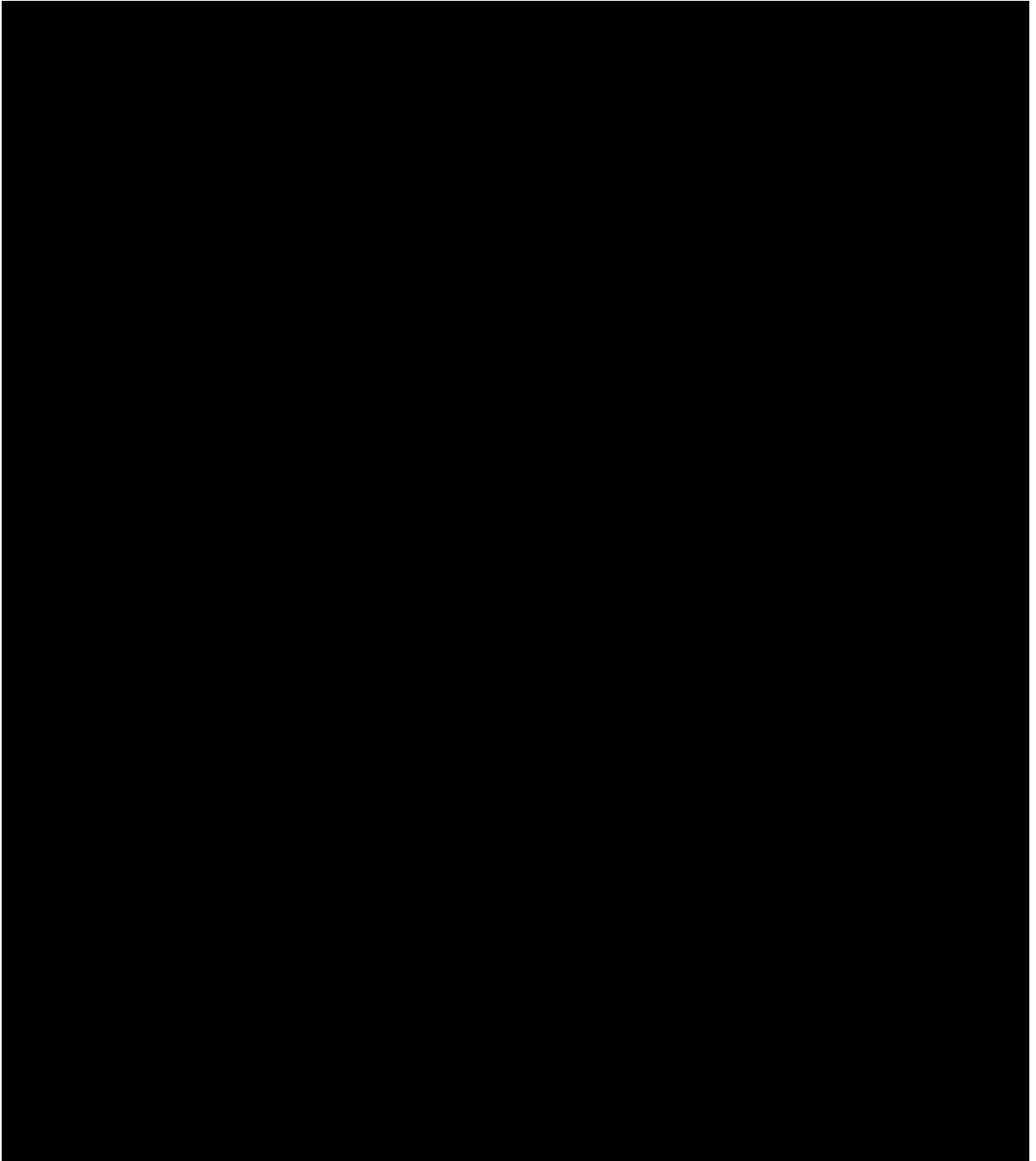
23 Q Can you turn to the next page,
24 please, Bates stamped 29.

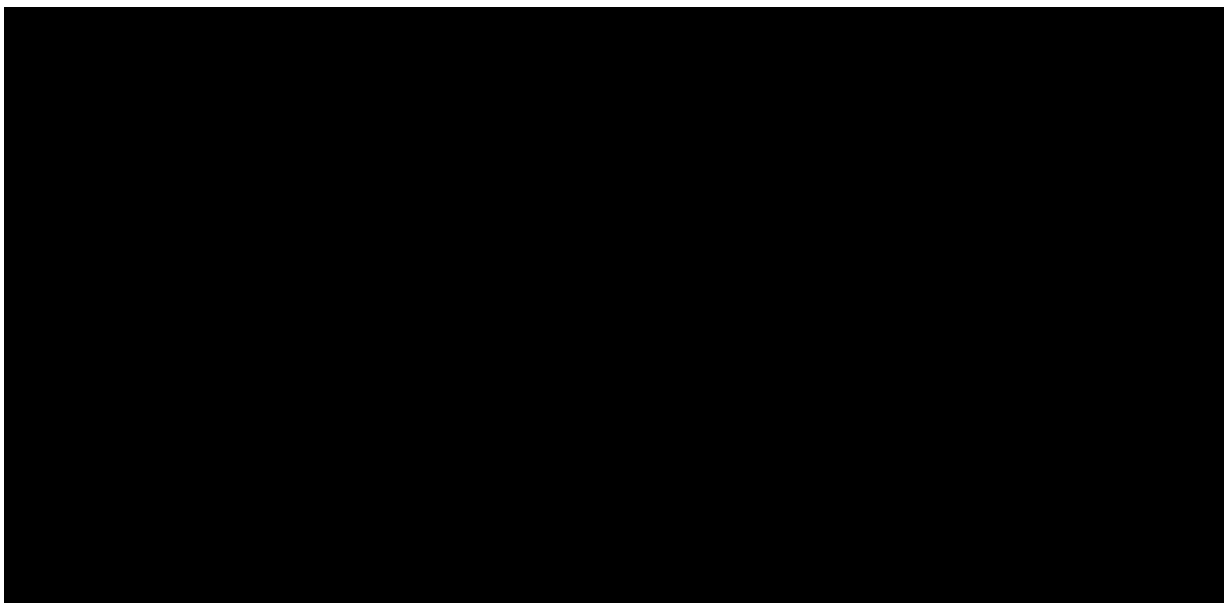
25 A Yes.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q The third -- I'm sorry, the top
3 e-mail. Sorry.

4 MR. WOLOSKY: Strike that.





10 Q And then you write, "Broidy
11 spoke to Malcolm."

12 Do you see that?

13 A Yes.

14 Q And why did you write that?

15 A Because Malcolm told me that
16 Broidy spoke to him.

17 Q About what?

18 A No, just he was nice to him and
19 he spoke. That's all. The way he says
20 it.

21 Q Now, the very last WhatsApp
22 message on that page is a WhatsApp message
23 from Nick Muzin to you on January 25,
24 2018, at 5:42 p.m.

25 Do you see that?

1 Allaham - ATTORNEYS' EYES ONLY

2 A Yes.

3 Q Okay.

4 It says, "We got the press going
5 after Broidy."

6 Do you see that?

7 A Yes.

8 Q Do you know what he is referring
9 to?

10 A I think he was referring to a
11 lot of reporters calling him. A lot of
12 reporters are calling him telling him
13 that, you know, they have information on
14 Broidy.

15 Q He seems to be saying, "We got
16 the press going after Broidy."

17 Who is the "we" in that
18 sentence?

19 MS. YUSUF: Objection.

20 A I don't know who the "we" is.

21 Q Were you involved in getting the
22 press to go after Broidy?

23 A Never, I never spoke to a
24 reporter until last week probably.

25 Q Who was Nick Muzin working with

1 Allaham - ATTORNEYS' EYES ONLY
2 to get the press to go after Broidy?

3 A I have no idea.

4 MR. GIMBEL: Objection. Assumes
5 facts not in the record. Lacks
6 foundation.

7 BY MR. WOLOSKY:

8 Q Now, he says, "I e-mailed you."
9 Do you see that?

10 A Yes.

11 Q I'd like to -- I'd like you to
12 take a look at an exhibit that we have
13 marked. I believe we have marked it
14 Exhibit 23.

15 This is an e-mail produced to us
16 by your lawyers. It's Bates stamped
17 PROD000000075.

18 (Whereupon, E-mail from Nick
19 Muzin to Joey Allaham, Dated January
20 25, 2018, was marked as Allaham
21 Exhibit 23 for identification, as of
22 this date.)

23 BY MR. WOLOSKY:

24 Q It is an e-mail that has been
25 forwarded to you from Nick Muzin on

1 Allaham - ATTORNEYS' EYES ONLY
2 January 25, 2018, at 5:25 p.m. And the
3 forwarded e-mail is an e-mail from Ben
4 Wieder to Nick Muzin dated January 26,
5 2018, at 1:09 a.m.

6 A Okay.

7 Q And Nick Muzin writes to you in
8 the forwarding e-mail, "Time to rock."
9 Do you see that?

10 A Yes.

11 Q What does he mean by, "Time to
12 rock"?

13 MR. GIMBEL: Objection. Calls
14 for speculation.

15 A I mean, nearer to the bottom
16 e-mail, "Hope you had a good flight.
17 Sending along my contact info. As I
18 mentioned, we spoke briefly. I am working
19 on a story about Elliott Broidy and hoping
20 to talk. Let me know when is best for
21 you."

22 I mean, I don't know what he
23 meant, but it clearly states that somebody
24 was working on a story, and Nick was
25 excited.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q And he conveys that excitement
3 to you, correct?

4 A He wrote it, yes.

5 Q And did you share his
6 excitement?

7 A No.

8 Q Why was he excited?

9 MS. YUSUF: Objection.

10 A I don't know.

11 Q Did you ever discuss with Nick
12 Muzin why he was excited that the media
13 was going after Elliott Broidy?

14 A I mean it is not -- again, we
15 were not -- or I was not, I should say for
16 me, that -- aware of what's coming down on
17 Elliott. So it was something that's -- I
18 cannot speak for Nick about.

19 Q Why would you think he would be
20 excited and that it is time to rock? Did
21 he dislike Elliott Broidy?

22 A Again, I think it is a rivalry.
23 It is competition. So this is how I
24 perceive it. I cannot look at it any
25 different way. I mean he has to answer it

1 Allaham - ATTORNEYS' EYES ONLY
2 for himself.

3 Q Did you ever discuss with Nick
4 Muzin how Mr. Broidy was an impediment of
5 the successful completion of his lobbying
6 work for Qatar?

7 A I don't think I knew to what
8 extent it was, or Nick did. I don't want
9 to speak on his behalf. But I don't think
10 anyone knew what extent Elliott had, so.
11 You know, to us, Joel is the guy who was
12 lobbying for Qatar. I never believed
13 Broidy was.

14 Q Did Nick believe that Elliott
15 Broidy was having discussions with senior
16 U.S. officials about Qatar?

17 MS. YUSUF: Objection.

18 A I don't know. I cannot speak
19 for him, but for myself, I never believed
20 it.

21 Q Now, can you please go back to
22 the exhibit that we were looking at a
23 moment ago, Exhibit 5, the exhibit of
24 WhatsApp messages.

25 A Yes.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Now, we were just on page 29.
3 We discussed the e-mail.

4 A Yes.

5 Q I'm sorry. Before we go on, do
6 you know who Ben Wieder is?

7 A Ben Wieder?

8 Q Yes, on Exhibit 23.

9 A Exhibit 23? No, I don't.

10 Q Have you ever talked to him?

11 A Never. And I'll state on the
12 record, I never spoke to any reporters
13 until my last-week article.

14 Q Now, going back to Exhibit 5,
15 the next page, Bates stamp 30, can you
16 turn to that page.

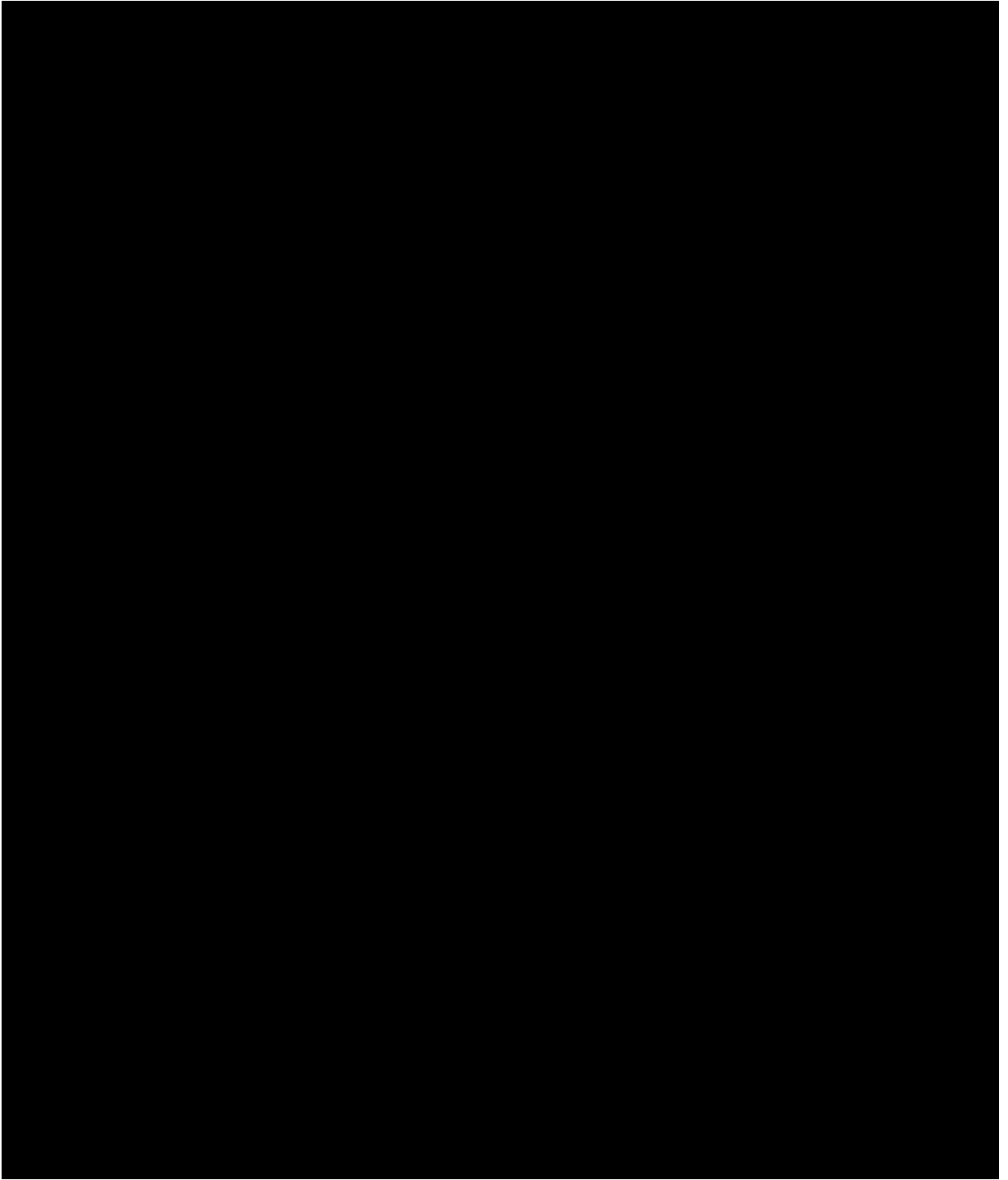
17 A Yes.

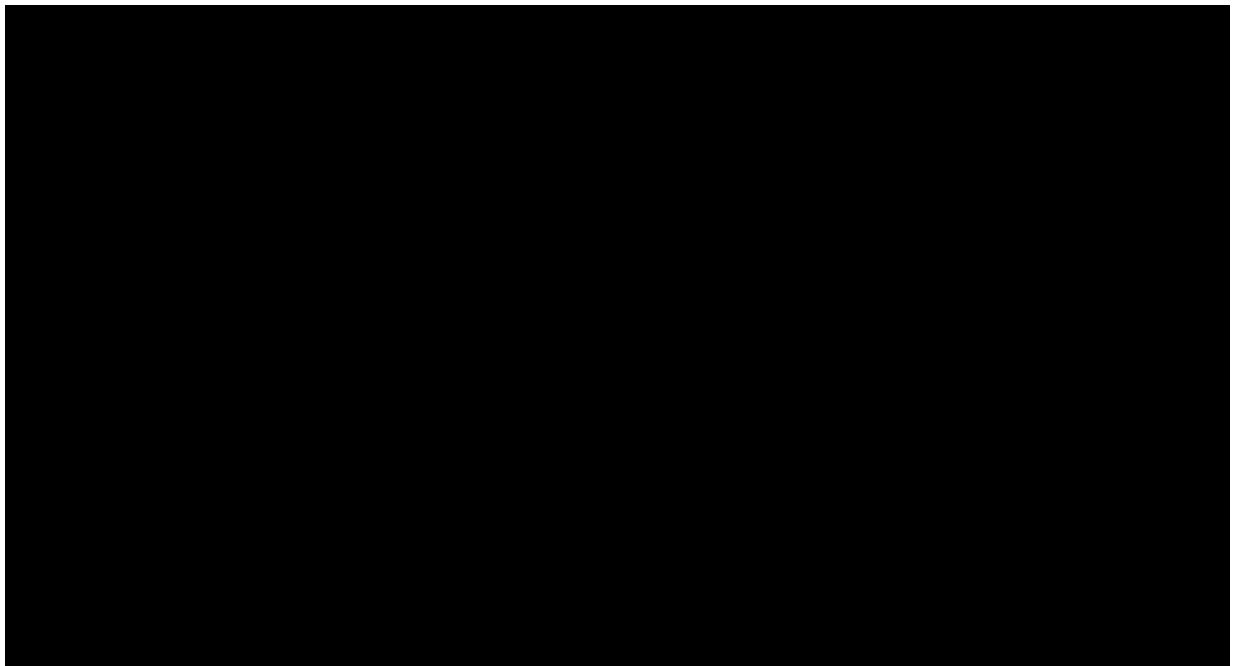
18 Q You reply within 60 seconds to
19 Mr. Muzin's e-mail, that said, "We got the
20 press going after Broidy." You reply,
21 "Just be very careful."

22 Why were you advising Mr. Muzin
23 to be very careful?

24 A Because I did not really believe
25 that all of this stuff was not relevant to

1 Allaham - ATTORNEYS' EYES ONLY
2 me. I sympathized with what happened with
3 Elliott, to be honest.





11 Q Is there any place in these
12 WhatsApp messages that you can point to
13 that refers to the documentary?

14 A I don't see it.

15 Q Do you --

16 A Usually, I'm going to state
17 also, when I was doing things, I never
18 liked to share with anybody because I
19 don't want it to end up in the press. So
20 I knew that something that's -- I don't
21 want it to end up being in the press until
22 it is done.

23 Q Right. But the immediate
24 message to which you're replying says, "We
25 got the press going after Broidy." So you

1 Allaham - ATTORNEYS' EYES ONLY

2 reply, "Alan is doing something tomorrow
3 himself."

4 Is your testimony that that had
5 nothing to do with the press going after
6 Broidy?

7 A Absolutely not. We have --
8 absolutely not.

9 Q Why would you write that message
10 in response to Mr. Muzin's about the press
11 going after Broidy?

12 A I stated, again, I never
13 believed in speaking to the press. It
14 only screws things up. So I just
15 always -- I'm paranoid from the press.

16 Q And then the last sentence in
17 that text message is, "He helped so the
18 hill one which I think is great."

19 What does that mean?

20 A The article in The Hill that he
21 wrote.

22 Q That who wrote?

23 A Mr. Dershowitz.

24 Q And then two text messages down
25 you write to Mr. Muzin, "This Vegas thing

1 Allaham - ATTORNEYS' EYES ONLY
2 is bothering me."

3 What is that in reference to?

4 A Him being -- I think -- I don't
5 really recall, but I think he was
6 kicked -- I don't know if he was kicked
7 out or something he was -- he told me
8 about, he was kicked out.

9 Q Now, the last WhatsApp message
10 on this page is a message from you to Nick
11 Muzin. It reads, "Does Bob Book go?"

12 Do you see that?

13 A Yes.

14 Q Who is Bob Book?

15 A Just a wealthy Republican
16 individual. I was asking if he was in
17 Vegas, did he go.

18 Q And is he involved in running
19 Miramax, Mr. Book?

20 A No.

21 Q If you can turn to the next page
22 which is Bates stamped 31.

23 And do you see texts that begin
24 on March 1, 2018, between you and Mr.
25 Muzin?

1 Allaham - ATTORNEYS' EYES ONLY

2 A What page, 31?

3 Q Bates stamped 31.

4 A Yes.

5 Q There is a series of text
6 messages that begin on March 1, 2018, and
7 these are news articles concerning
8 Mr. Broidy and his relationship with
9 something called 1MDB.

10 Do you see that?

11 A What date is it? Yes, I see it.
12 The Real Deal line?

13 Q Yes, The Real Deal and the Wall
14 Street Journal.

15 A Yes.

16 Q And Mr. Muzin writes to you at
17 1:04 p.m., "He is finished."

18 Do you see that?

19 A Yes.

20 Q Did you think that Broidy was
21 finished as a result of these news
22 articles?

23 A I have no idea. I don't know
24 his -- I don't -- I was not concerned
25 about -- this, to me, was pure trash and

1 Allaham - ATTORNEYS' EYES ONLY
2 gossip.

3 Q But Nick is concerned about it,
4 correct?

5 MS. YUSUF: Objection.

6 A I can't speak for Nick.

7 Q What does he mean -- what do you
8 believe Nick means when he writes to you
9 "he is finished"?

10 A I don't know. I'm not going to
11 speak for Nick.

12 Q Do you believe that Nick had a
13 role in the publication of the articles
14 that he is sending to you and you were
15 sending to him?

16 A I don't believe so, no. I think
17 reporters did call him because everyone
18 knew he was lobbying for Qatar. And Nick
19 likes to speak to the press, so --

20 Q So what would lobbying for Qatar
21 have to do with articles concerning
22 Elliott Broidy and Malaysia?

23 A Again, I don't know, I can't
24 speak for Nick, but I was not -- any
25 knowledge of any of these besides what you

1 Allaham - ATTORNEYS' EYES ONLY

2 saw, so I don't know.

3 Q Did Nick ever explain to you why
4 reporters were calling him to talk about
5 Elliott Broidy's hacked e-mails?

6 A No.

7 Q Did you ever ask him?

8 A You know, he -- again, Nick was
9 being told that there are hacked e-mails
10 and they were calling -- that's what I was
11 told, that they were asking for his input.

12 Q Why do you think they were
13 asking for Nick's input?

14 A I think -- I get calls. I
15 got -- since I registered, I got 40 phone
16 calls from reporters. I think it is a
17 typical -- whenever you have a scandal,
18 you want someone to go on the record or do
19 whatever to help put something out. Or
20 add to it or -- but again, I speak for my
21 opinions, not for Nick.

22 Q Can you turn to the next page,
23 please. It's Bates stamped 32. The first
24 message on that page which Muzin sends to
25 you reads, "We have reason to believe this

1 Allaham - ATTORNEYS' EYES ONLY
2 hack was sponsored and carried out by
3 registered and unregistered agents of
4 Qatar seeking to punish Mr. Broidy for his
5 strong opposition to state-sponsored
6 terrorism," said the spokesman.

7 You respond, "That's F crazy."
8 Do you see that?

9 A Yes.

10 Q And what do you mean by that,
11 "That's F crazy"?

12 A That -- to see that agents
13 registered or non-registered, I mean
14 ridiculous.

15 Q Why do you think it is
16 ridiculous?

17 A Because I don't believe -- this
18 is my opinion, I don't believe any
19 Americans, lobbyists were involved. I
20 don't know. Just something that's -- it
21 was shocking, same times. You know,
22 you're excited to see your opponent being
23 defeated. So it is not something that
24 should go out of context. You know, it
25 is -- you know, at the end of the day,

1 Allaham - ATTORNEYS' EYES ONLY

2 Elliott lost this fight, and that's really
3 the conversation.

4 Q Did you consider Elliott your
5 enemy?

6 A No, I don't consider Elliott my
7 enemy. I don't. Even the opposite, I was
8 trying to -- Joel can vouch that I was
9 trying to make peace and not have this
10 chaos because it is not beneficial.

11 Q When you say, "At the end of the
12 day, Elliott lost this fight," what do you
13 mean by that?

14 A Meaning, at the end of the day,
15 Nick was right in his proposal that
16 Elliott became apparent, from the hacked
17 e-mails that we read, that he was doing
18 everything, lobbying without being
19 registered as an agent.

20 Q And I don't understand.

21 Which fight, who was he fighting
22 with in your mind?

23 A Again, you know, there is two
24 countries. We have Qatar and we have the
25 other countries. We are on the other

1 Allaham - ATTORNEYS' EYES ONLY
2 side.

3 These e-mails came out, exposed
4 Elliott, exposed the other country. So in
5 a way, you had something on the other --
6 on your opponent. So if you're working --
7 again, working for the other team was a
8 goal scored against you, so this is how we
9 looked at it. This is how I looked at it.

10 Q Who do you think scored the goal
11 against Elliott?

12 A I don't know who scored the goal
13 and they end up in the press.

14 Q Who do you think would have a
15 reason to score the goal?

16 A I don't want to speculate on
17 who, but definitely I could say it is not
18 me and I know Nick, it's not in Nick's
19 capacity. I'm not speaking for him, so --

20 Q Do you believe that the hack was
21 beneficial to the State of Qatar?

22 A No, I don't. Not at all.

23 Q Why is that?

24 A And I think it was very much
25 damaging. The opposite.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Why is that?

3 A Because we were winning without
4 this hacking. This hacking, whatever, was
5 not beneficial for Qatar, period. I don't
6 believe it was beneficial. I think it was
7 not.

8 Q Do you think that the State of
9 Qatar was responsible for the hacking?

10 A I cannot speak for them, and it
11 is not my place to speak for a nation.
12 But if someone asked me, I would advise
13 against any of that.

14 Q Do you think the State of Qatar
15 had the ability to hack Mr. Broidy?

16 MS. YUSUF: Objection.

17 A I don't know.

18 Q Do you believe that the State of
19 Qatar has hacked other enemies of the
20 State of Qatar?

21 A I don't know. Not to my
22 knowledge.

23 Q Have you read public reports
24 about hacking taking place between the
25 State of Qatar and the United Arab

1 Allaham - ATTORNEYS' EYES ONLY

2 Emirates?

3 A I have read reports about that.

4 Q Do you know anything about that?

5 A I do not know besides what I
6 read.

7 Q Do you believe it to be true?

8 A I don't know. I cannot
9 speculate.

10 Q Okay. So let's go back to this
11 document, Exhibit 5. The document -- we
12 are on the document that is Bates stamped
13 32. We just talked about an e-mail or a
14 text message that you wrote that said,
15 "That's F crazy."

16 A Yes. Page 32, right?

17 Q Yes.

18 Can I ask you to turn to the
19 page that's Bates stamped 34?

20 A I like 32. There is one part
21 you should read so it will give an
22 explanation.

23 Q What part is that?

24 A "Now it makes sense why Broidy
25 and Mowbray have been going after me for

1 Allaham - ATTORNEYS' EYES ONLY
2 months." Meaning he just figured it out.
3 I'm not seek speaking for Nick,
4 but reading it, now it makes sense why
5 they are going after him. Meaning they
6 just found out why they have been going
7 after Nick.

8 Because Joel was going after
9 Nick, and that's their rivalry that I kept
10 on saying. He pushed articles against me,
11 Joel, and I was very upset about it.
12 There was no reason for this kind of
13 stuff.

14 Q And the reason why Broidy and
15 Mowbray have been going after Nick for
16 months, you're saying, is because they
17 just discovered that Qatar was responsible
18 for the hack of their e-mails?

19 A No.

20 MR. GIMBEL: Objection.
21 completely mischaracterizes his
22 testimony in the most ridiculous way.

23 A No.

24 MS. YUSUF: I join in that
25 objection.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q So, I'm sorry, can you explain
3 again what your testimony is?

4 A He just found out why Broidy and
5 Mowbray were going after Nick, after he
6 read the e-mails.

7 Q Can you turn to the page that's
8 Bates stamped number 34.

9 A Yes.

10 Q There are e-mails beginning
11 March 6, 2018, between you and Nick Muzin.
12 Do you see that in the middle of
13 the page?

14 A Yes.

15 Q You send to Mr. Muzin two news
16 articles concerning Broidy, one is
17 Bloomberg and one is New York Times.

18 Do you see that?

19 A Yes.

20 Q And then Mr. Muzin responds,
21 "Saw it, means more Broidy stuff will be
22 coming out. More people talking about
23 Joel."

24 Do you know what that means?

25 A It means what it says, meaning

1 Allaham - ATTORNEYS' EYES ONLY
2 more stuff is coming out.

3 Q And how does Mr. Muzin know
4 that?

5 A Because, again, to my knowledge,
6 reporters were always calling him.

7 Q Can you turn to the next page,
8 please. This is Bates stamped 35.

9 A Yes.

10 Q The bottom of the page.

11 A Yes.

12 Q The message that we have already
13 discussed. It says, "Broidy is saying
14 Biniatta framed him."

15 Do you see that?

16 A Yes.

17 Q Has Biniatta ever paid you any
18 money directly?

19 A Never.

20 Q Has Biniatta ever paid you any
21 money indirectly?

22 MS. YUSUF: Objection.

23 A I don't know.

24 Q You don't know if Biniatta ever
25 paid money to you indirectly?

1 Allaham - ATTORNEYS' EYES ONLY

2 A No.

3 Q Have you ever met with anyone
4 from Biniatta?

5 A No.

6 Q The messages continue about
7 Biniatta, "Holy shit," you're saying to
8 Mr. Muzin. And then you say, "This is
9 stupid," to Mr. Muzin. And then you say,
10 "Call me."

11 These are 3 messages in the
12 space of ten minutes.

13 Why did you want Mr. Muzin to
14 call you?

15 A I don't remember. I don't
16 remember.

17 Q Was it about Biniatta?

18 A I had no -- I never paid much
19 attention to these stories.

20 Q Can you turn to the next page,
21 please. It's Bates stamped 37.

22 A Yes.

23 Q The top of the page, Mr. Muzin
24 sends to you a Huffington Post story about
25 leaked e-mails of Elliott Broidy.

1 Allaham - ATTORNEYS' EYES ONLY

2 Do you see that?

3 A Yes.

4 Q And you respond, "Crazy."

5 Do you see that?

6 A I do.

7 Q Do you know why you responded
8 "crazy"?

9 A Just my reaction, that it is
10 not -- I'm not saying I love it. I'm not
11 enthusiastic about it. I'm not excited.

12 Q And then on March 12, you send
13 another article to Nick Muzin and this one
14 is from The Hollywood Reporter. And
15 again, it is about the probe. And you
16 write, "This is a long one in a way
17 mentions you, which is good, I think."

18 Do you see that?

19 A Uh-huh.

20 Q Why did you think it was good
21 that Mr. Muzin was mentioned in an article
22 about Elliott Broidy?

23 A I have to read the article. I
24 don't remember. There are so many
25 articles. I was trying to make him feel

1 Allaham - ATTORNEYS' EYES ONLY

2 good. I don't know.

3 Q Now, you say, "Call me," after
4 you read it.

5 Do you recall whether Mr. Muzin
6 called you?

7 A You have my records, I have no
8 idea.

9 Q Now, the next message says -- it
10 is from you to Mr. Muzin, "I don't think
11 anything they will put on Broidy will
12 stick."

13 Do you see that?

14 A Yes.

15 Q Who is the "they" in that
16 sentence?

17 A I mean all of these articles.
18 You see, I was defending your client. You
19 don't get that from the records. I did
20 not believe in all of this nonsense.

21 Q Can you turn to the next page,
22 please. It's Bates stamped 38.

23 A Yes.

24 Q Again, Mr. Muzin, here, is
25 referring to "they" in a message he sends

1 Allaham - ATTORNEYS' EYES ONLY
2 you on March 13, 2018, about Jamal
3 reviewing the e-mails.

4 Do you see that?

5 A Yes.

6 Q Who is the "they"?

7 A I'm not sure what was the point
8 of "they," but -- I mean everyone that was
9 reading those e-mails assumed the Qataris
10 would be -- everybody was reading those
11 e-mails.

12 Q And does this reflect your
13 belief that "they" is the Qataris?

14 A I'm not sure what I refer to
15 them.

16 Q Jamal was working for the
17 Qataris, right?

18 A I don't know. I still don't
19 know.

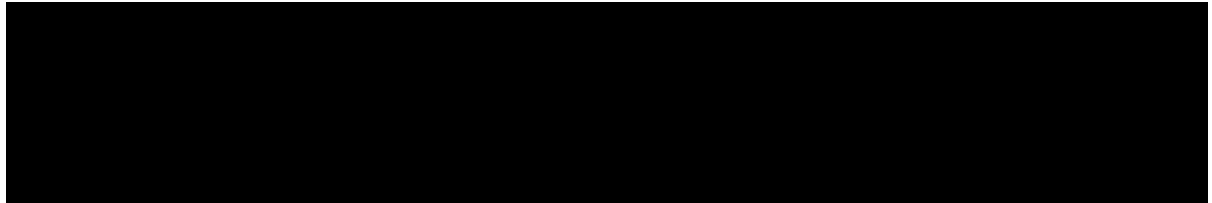
20 Q Jamal had a relationship with
21 the Qataris?

22 A He had a relationship with every
23 nation in the world, I would say.

24 Q Why do you think he would have
25 taken credit for the Broidy e-mails?

1 Allaham - ATTORNEYS' EYES ONLY

2 A I don't mean the credit for the
3 Broidy e-mails. I'm thinking about just
4 for the proposals that Nick put in
5 together that's make -- you know, make our
6 team look good.



10 A No, I mean, I would not say
11 that. Meaning, again, it is like the
12 Qatari, you know, if it was the other way
13 around, Elliott's team would be happy to
14 see the stuff. So this is really the
15 context that would put it in, phrase it
16 in.

17 Q So when you texted Mr. Muzin,
18 "I'm sure he took the credit," you mean
19 the credit for a victory for the Qatari
20 team?

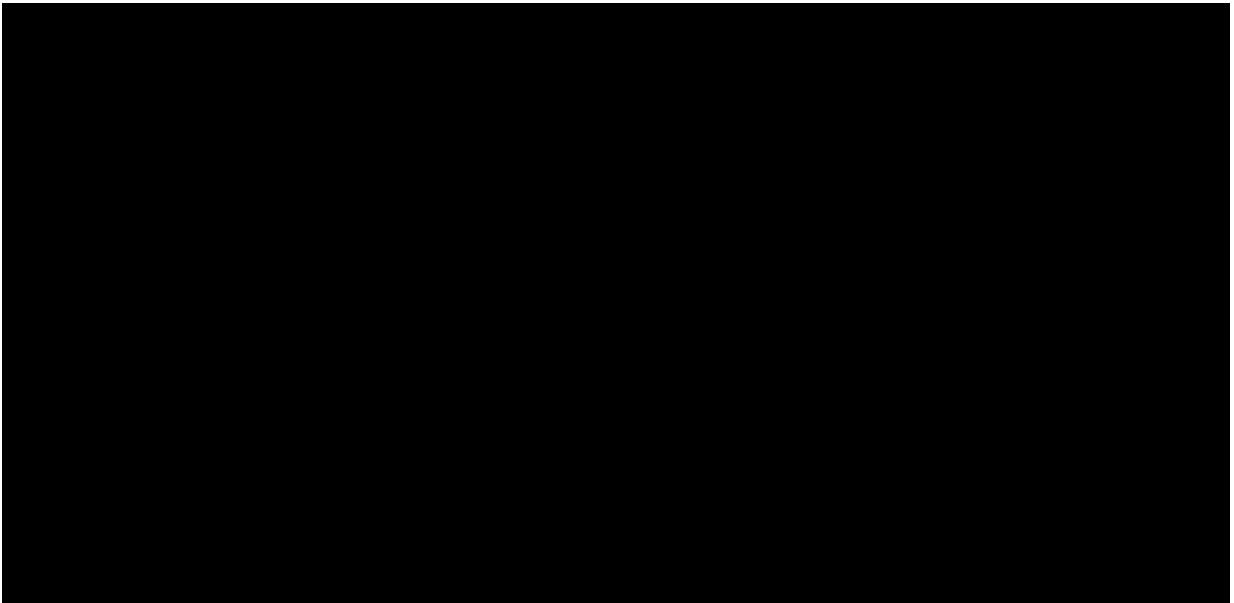
21 A No, it's not, meaning the credit
22 that Nick was right all along about --

23 Q This is a reference to Jamal
24 Benomar?

25 A Yes.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q So I'm not sure I understand
3 what you are saying that you believe he
4 would take the credit for?



14 MS. YUSUF: Objection.

15 MR. GIMBEL: Objection to form.

16 A I mean that's what I would look
17 at it as.

18 Q On March 14, you ask Mr. Muzin,
19 "Any news?"

20 Do you see that?

21 A Yes.

22 Q What is that referring to?

23 A It's more of an Arabic way, this
24 is how you phrase this conversation. My
25 wife -- I mean this is how I communicate.

1 Allaham - ATTORNEYS' EYES ONLY

2 Like, what's going on in Arabic, you say
3 "any news."

4 Q And Mr. Muzin responds less than
5 a minute later, "Nothing. I'll get some
6 intel about the Broidy event soon."

7 Do you see that?

8 A Yes.

9 Q Does Mr. Muzin speak Arabic?

10 A No.

11 Q So what is the intel about the
12 Broidy event that he is referring to?

13 MS. YUSUF: Objection.

14 A I'm not sure. I think the
15 Broidy fundraiser probably.

16 Q Were you very curious about
17 that?

18 A I think everybody was curious.
19 The whole world was curious, if you watch
20 TV.

21 Q What was the fundraiser you were
22 referring to?

23 A That they were throwing a
24 fundraiser to the president. I mean that
25 was every night on TV.

1 Allaham - ATTORNEYS' EYES ONLY

2 Q Now, on the next page on
3 March -- the next page is Bates stamped
4 39.

5 A Yes.

6 Q And on March 15, you send an
7 article to -- I'm sorry, Mr. Muzin sends
8 an article to you from McClatchy, which we
9 have, and I'll represent to you it's about
10 someone named Yuri Vanetik and Elliott
11 Broidy. You respond, "That's not good."

12 Who is Yuri Vanetik?

13 A I have no clue.

14 Q Why did you respond, "That's not
15 good"?

16 A Because, again, I don't like
17 articles. I'm not a fan of bad articles.

18 Q There are many articles that
19 were sent to you that you didn't have any
20 response to.

21 Do you know why you thought this
22 one in particular was not good?

23 A No, I don't recall this one.

24 But I think I responded many times, that's
25 the same response. It's not -- I'm not --

1 Allaham - ATTORNEYS' EYES ONLY

2 I don't cheer for -- to me, this is cheap
3 shots.

4 Q And so you don't know who your
5 Yuri Vanetik is?

6 A I have no clue. Never met the
7 guy.

8 Q And two text messages down, you
9 write to Muzin, "I keep on thinking to use
10 Ben Brafman for Jamal."

11 And what is it that you thought
12 Ben Brafman could do for Jamal?

13 MS. YUSUF: Objection. Asked
14 and answered.

15 MR. GIMBEL: Objection.
16 Misstates his prior testimony.

17 BY MR. WOLOSKY:

18 Q What is the meaning of this
19 sentence, "I keep on thinking to use Ben
20 Brafman for Jamal"?

21 A To sue him.

22 Q That you would sue Jamal?

23 A Yes.

24 Q Why would you sue Jamal?

25 A Because I was getting the

1 Allaham - ATTORNEYS' EYES ONLY
2 runaround.

3 Q About what?

4 A About my money.

5 Q That Jamal owed to you?

6 A I mean, Jamal, I couldn't sue
7 the State of Qatar. Everyone -- I
8 couldn't do that. Nobody was interested
9 in that.

10 Q And did you sue Mr. Benomar?

11 A No.

12 Q Why did you decide not to sue
13 him?

14 A Because the lawyers told me I
15 don't have an agreement and it will be --

16 MS. YUSUF: Don't testify to
17 anything that's privileged.

18 A Okay, it's privileged.

19 Q So try to answer the question
20 without revealing attorney-client
21 privilege information.

22 A That I did not want to waste any
23 money.

24 Q On lawyers to chase Jamal
25 Benomar?

1 Allaham - ATTORNEYS' EYES ONLY

2 A Yes.

3 Q How much money do you think he
4 owed you?

5 A It's -- it's complicated. So
6 it's not something that I would want to
7 share yet. It's confidential, I think.

8 Q Well, this is an attorneys' eyes
9 only deposition. This is directly
10 relevant to the subject matter of your
11 subpoena. So I would ask you to please
12 answer the question.

13 Can you read back the pending
14 question?

15 A I know the question. I
16 understand the question. Again, it is two
17 parties that, you know, I think I'm owed
18 something and the other party thinks I'm
19 owed something else. So it is hard to
20 pinpoint, but from my point I would say
21 from a number, could be from five to ten
22 million.

23 Q And you were seeking to pursue
24 Jamal Benomar for that money even though
25 the money was really owed to you by the

1 Allaham - ATTORNEYS' EYES ONLY

2 State of Qatar, correct?

3 A Yes.

4 Q And is that because Jamal
5 Benomar was holding that money for you?

6 A I could not get a straight
7 answer so I did not know what -- this is
8 part, you know, your -- you know,
9 sometimes excuse if you have an offshore,
10 I was trying to do it. I gave up on that.
11 It was harder than having a baby.

12 So I just was trying to pinpoint
13 to get my money, that's all I was trying
14 to do. I was being a debt collector.

15 MS. YUSUF: Counsel, I believed
16 we have reached the seven-hour mark,
17 but I will ask the videographer to
18 confirm.

19 THE VIDEOGRAPHER: Two minutes.

20 MR. WOLOSKY: We get eight
21 hours.

22 BY MR. WOLOSKY:

23 Q Can you turn to the next page,
24 please, Bates stamped 40.

25 "You see juice in it?" Do you

1 Allaham - ATTORNEYS' EYES ONLY

2 see an e-mail that you wrote?

3 MR. WOLOSKY: We get eight hours
4 under the federal rules.

5 MS. YUSUF: Which rule are you
6 referring to?

7 MR. GIMBEL: Seven.

8 MR. WOLOSKY: Seven hours?

9 MR. GIMBEL: Yes.

10 MS. YUSUF: Rule 30.

11 BY MR. WOLOSKY:

12 Q Can you turn to the document
13 that's Bates stamped 44.

14 A Yes.

15 Q No, actually, sorry, turn to 43,
16 preceding it. Mr. Muzin and you engage in
17 a series of text messages, "Nothing will
18 be expedited about this lawsuit.
19 Fantastic. Good."

20 And then you write, "Will give
21 us time."

22 Give you time for what?

23 A Probably to collect what I'm
24 owed.

25 Q Can you turn to the document

1 Allaham - ATTORNEYS' EYES ONLY

2 that's Bates stamped number --

3 A Page 44.

4 MR. WOLOSKY: I'll finish in
5 five minutes.

6 MS. YUSUF: You'll finish in
7 seven seconds.

8 BY MR. WOLOSKY:

9 Q Bates stamped 52.

10 MS. YUSUF: We've reached the
11 seven-hour mark, Counselor, so we're
12 going to stop the deposition because
13 that's all the time you're entitled to
14 under the rules of federal procedure.

15 MR. WOLOSKY: I'm going to ask
16 one more question.

17 MS. YUSUF: We're going to go
18 off the record because we're past the
19 seven-hour mark.

20 MR. WOLOSKY: We're going to
21 stay on the record, but you can leave
22 if you wish.

23 MS. YUSUF: You will need leave
24 of the Court to keep him beyond seven
25 hours. So unless you have that, you

1 Allaham - ATTORNEYS' EYES ONLY
2 cannot keep him beyond the seven
3 hours. And the videographer has
4 indicated to me that we have reached
5 the seven hours.

6 MR. WOLOSKY: I'm requesting 15
7 more minutes, absent which we will
8 seek leave of Court as a result of the
9 witness' evasion during this
10 deposition.

11 Will you give us 15 more
12 minutes?

13 MS. YUSUF: I am not authorized
14 to give you beyond what is required.

15 MR. WOLOSKY: You are
16 authorized. You can allow him to sit
17 for ten more minutes.

18 MS. YUSUF: The last time that I
19 reached an agreement with your firm
20 outside of what we were ordered by the
21 Court --

22 MR. WOLOSKY: This wasn't
23 ordered by the Court. This is the
24 Federal Rules of Civil Procedure.

25 MS. YUSUF: I'm going to go with

1 Allaham - ATTORNEYS' EYES ONLY
2 the rules, so we are going off the
3 record.

4 Mr. Allaham, I'm instructing you
5 not to answer any more questions. We
6 have reached the seven-hour mark. If
7 counsel wants to seek leave of Court
8 for more time, he has every right to
9 do so.

10 MR. WOLOSKY: We will do so.

11 THE VIDEOGRAPHER: The time is
12 6:11 p.m., and we're going off the
13 record.

14

15

16

17

JOSEPH ALLAHAM

18

19 Subscribed and sworn to
20 before me this day
21 of , 2018.

22

23

24

25