

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT, IN AND FOR DADE
COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO. 77-30027 (Div. 40)

GUILLERMO B. CASTRO, :
individually, :
 :
Plaintiff, :
 :
-vs- :
 :
CENTRO AMERICANA DE PLASMA- :
PHERESIS, S. A., et al., :
 :
Defendants. :
-----X

DEPOSITION OF PEDRO M. RAMOS

Suite 501
1401 Brickell Avenue
Miami, Florida
February 3, 1978
10:30 o'clock a.m.

APPEARANCES:

FINLEY, KUMBLE, WAGNER, HEINE &
UNDERBERG,
By: HAROLD G. MELVILLE, ESQ.,
on behalf of the Plaintiff.

FLYNN, RUBIO & TARKOFF,
By: VINCENT J. FLYNN, ESQ.,
co-counsel on behalf of the Plaintiff.

TAYLOR, BRION, BUKER & GREENE,
By: ARNALDO VELEZ, ESQ.,
on behalf of the Defendant, Centro
Americana De Plasmapheresis, S.A.

ALSO PRESENT: GUILLERMO B. CASTRO



Walter Holden Associates
200 Southeast First Street
Miami, Florida 33131 Telephone: 305-358-3493

The deposition of PEDRO M. RAMOS, a witness of lawful age, taken for the purpose of discovery and for use as evidence in the above-entitled cause, pending in the Circuit Court of the 11th Judicial Circuit in and for Dade County, Florida, pursuant to notice, before NATHANIEL CORBIN, a Certified Shorthand Reporter and Notary Public in and for the State of Florida at Large, at the time and place aforesaid.

I N D E X

Witness

Direct

Pedro M. Ramos

3

CERTIFIED QUESTIONS

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21



1 Thereupon--

2 PEDRO M. RAMOS,
3 was called as a witness by the Plaintiff, and having
4 been first duly sworn, was examined and testified as
5 follows:

6 DIRECT EXAMINATION

7 BY MR. MELVILLE:

8 Q Would you please state your full
9 name?

10 A Pedro M. Ramos.

11 Q And what is your residence address?

12 A 10300 Southwest 84th Court.

13 Q And what is your profession?

14 A I am a medical doctor.

15 Q And where is your practice located?

16 A 1300 Coral Way.

17 Q Doctor, have you ever heard of the
18 company known as Centro Americana De Plasmapheresis,
19 S.A.?

20 A If I ever heard?

21 Q Have you ever heard of a company by
22 that name?

23 A Yes. I am a stockholder of that
24 company.



1 Q You are a stockholder of that com-
2 pany?

3 A Yes.

4 Q How much, what percentage do you
5 own?

6 A Approximately 14%.

7 Q How long have you owned that stock?

8 A Since the company was formed which
9 was in 1971. The exact date I can't remember.

10 Q And have you ever been a director of
11 that company?

12 A I am.

13 Q You are now a director?

14 A Yes.

15 Q Have you been a director since it
16 was formed?

17 A No. I've been a director since
18 February, 1975.

19 Q Who are the other current directors
20 of the company?

21 A As far as I know, Mr. Alvarez and
22 Dr. Santamaria.

23 Q Other than yourself, Dr. Santamaria
24 and Mr. Alvarez, have there ever been any other



1 directors of the company?

2 A Guillermo Castro.

3 Q When was he a director?

4 A He was a director--I don't know what
5 the first date was that he was named director, but
6 he was director until February, '75.

7 Q Did Mr. Castro hold any office in the
8 company? Was he an officer of the company?

9 A Well, he was a director.

10 Q In addition to being a director,
11 was Mr. Castro President, Treasurer, Secretary,
12 anything like that?

13 A Well, the names of the directors--
14 can I answer? The directors of the company, the
15 particular company, the man that holds all the power
16 is the President which is Dr. Santamaria. He's
17 got absolutely all the power by Statute, so the
18 other directors are actually a formality.

19 Q That's really not answering the
20 question. The question is, are there any other
21 officers?

22 A Officers of the company?

23 Q I'm sure counsel would simply have you
24 confine your answers to my questions.



1 A The directors got the titles, but the
2 title, in essence, means nothing.

3 Q Just answer the question.

4 A The President is Dr. Santamaria.
5 The Secretary is Alvarez. And he was the Treasurer,
6 Mr. Castro.

7 Q Did Mr. Castro cease to be the
8 Treasurer in February of '75?

9 A I guess about that time.

10 Q Who became Treasurer in February of
11 '75?

12 A When he was destitute by the
13 President and the stockholders, I was named in his
14 place.

15 Q So, in other words, you were named
16 Treasurer in place of Mr. Castro?

17 A That's correct.

18 Q Have you ever identified yourself to
19 anyone as the United States representative of that
20 company?

21 A Yes, I am.

22 Q You are the United States repre-
23 sentative?

24 A What is left of the company.



1 Q I understand that the company
2 recently had a fire?

3 A The building burned. I wasn't
4 there, but the information that I have, it was
5 totally destroyed.

6 MR. VELEZ: Doctor, wait until Mr.
7 Melville asks you a question before you answer.

8 Q (By Mr. Melville) As United States
9 representative of the company, what were your
10 duties?

11 A My duties were to keep all records
12 and to see that all procedures were done properly
13 according to the regulations of the Bureau of
14 Biologicals of the United States. In other words,
15 it was a technical function.

16 Q In other words, then, you really
17 were the prime contact between the company and the
18 Bureau of Biologics to ensure that the plasma was
19 taken correctly?

20 A Not only that, the proper care of
21 the donor.

22 Q What kind of care?

23 A I mean, certain regulations. The
24 primary concern of the Bureau of Biologicals is that



1 the donor is not abused. He's got to come only
2 at certain times. You cannot draw more than a
3 certain amount of plasma from that donor. And
4 before that, you have to test the donor in that
5 way that you are sure, according to the regula-
6 tions of the Bureau, that he is in good health.

7 Q What else would your functions have
8 been?

9 A There?

10 Q Yes.

11 A Well, that all the supplies were
12 there in order to function.

13 Q In other words, everything that you
14 needed would be available?

15 A That's correct.

16 Q What did you do in that regard?

17 A Well, we have cards. We will order,
18 when there was a reactor in fault or anything or
19 it was an amount that was going to be fault on that,
20 then we place orders to Mr. Octavio Flores which
21 was the head of the department of buying. That
22 was my function.

23 Q As the United States representative
24 of the company, did you talk to anybody or write to



1 anybody at the Bureau of Biologics?

2 A Yes.

3 Q What would you discuss with them
4 either by letter or telephone conversation?

5 A They can call me to announce a
6 visit. They can write me a letter sending me
7 material for testing.

8 Q They would send you material for
9 testing?

10 A Yes.

11 Q What kind of material?

12 A Well, for instance, they will send
13 me a panel of plasma with hepatitis and others
14 without hepatitis. We have this and they compare
15 our results with the results they already know to
16 find out if we were carrying out the procedures
17 properly.

18 Q Did you ever go to the office of
19 the Bureau of Biologics to meet the people?

20 A No. They were in Managua, but I
21 never met them. As a matter of fact, I never visited
22 the Bureau.

23 Q Did you ever meet any of these people
24 outside of Managua?



1 A Well, I had met them in Belize.

2 Q Did you ever meet them in the State of
3 Florida?

4 A No. As a matter of fact, no, except
5 one day at the airport.

6 Q A chance meeting?

7 A That's correct, absolutely.

8 Q As the United States representative
9 in dealing with these technical things, would it
10 be fair to say that you were the technical head
11 of the company?

12 A Correct.

13 Q In charge of all the medical pro-
14 cedures, really?

15 A Technical procedures, I would say.

16 Q Would you be in charge of testing the
17 blood to make sure it was correct?

18 A That's correct, yes.

19 Q In regard to testing of the blood,
20 were samples of blood sent into the United States
21 for testing?

22 A Not in my time.

23 Q Never in your time?

24 A Well, in the beginning from when I



1 took over, Mr. Castro there would send samples,
2 as far as I can remember, to Round Lake in Illinois
3 for testing.

4 Q I see.

5 A But after I took over, shortly after,
6 all testing was done in Managua.

7 Q Was that with the Bureau of Biologics
8 approval?

9 A Absolutely.

10 Q Did they correspond with you to
11 give you that approval?

12 A Yes.

13 Q Where is that correspondence?

14 A The correspondence, as far as I know,
15 has been burned because it was in Managua, but I
16 can't tell you for sure because I haven't been there.

17 Q Now, the testing that was done in
18 Round Lake, did they have to test each sample given
19 by each donor?

20 A That's correct.

21 Q And how were the results transmitted
22 back to you?

23 A By Telex.

24 Q Straight from Round Lake?



1 A Straight from Round Lake. As far
2 as I know, that was a very long time ago.

3 Q Were they ever mailed or sent to
4 someone in Miami and forwarded to you?

5 A I cannot answer that properly because
6 I don't know. I always received the mail over
7 there, that's the only thing. It didn't do me
8 any good to receive the mail here.

9 Q Do you know if the mail for the
10 company was sent to someone in Miami, then forwarded
11 to you?

12 A It could be the case that it could
13 be sent here to United States territory. It could
14 be mailed to California, for instance, maybe to
15 Florida, then somebody would carry that over into
16 Managua because the mail service in Managua was very
17 bad. It will take a long time.

18 Q So you really don't know if it was
19 mailed to someone in Miami and then forwarded down
20 to you or not, do you?

21 A No, no. It was directed to me or
22 was received there. That's all I know.

23 Q But you are not sure which?

24 A You got me confused. I received there



1 my mail regarding the testing. I repeat that it
2 was a long time ago because we did all our testing
3 there for the last couple of years.

4 Q All right. But the mail was sent,
5 some of it, to a location in Florida and then for-
6 warding down to you, was it not?

7 A I can't answer that truthfully be-
8 cause I cannot remember if that was the case.

9 Q Was any of the blood ever tested in
10 Florida?

11 A It could have been. Before my time,
12 it could have been, but I don't know. I really
13 can't testify for something that I don't know.

14 Q Did you have any connection with
15 the technical end of the business before February
16 of '75?

17 A Yes. I was supervising him. (Indi-
18 cating.)

19 Q You were supervising Mr. Castro?
20 MR. VELEZ: Who do you mean when you
21 refer to him?

22 A Castro. I'm sorry.

23 Q (By Mr. Melville) You can't recall,
24 when you were supervising him, whether or not any



1 of the blood was tested in Florida?

2 A No, because the results were sent
3 over to Managua. And it was not in Mr. Castro's
4 power, you know, to know exactly if the test was
5 done properly or not. He couldn't supervise, so
6 I cannot supervise him for something that he
7 doesn't have control over.

8 Q I'm just trying to get an answer to
9 the question. I think if we would simply answer
10 the question that I put forward, and that is, is
11 it fair to say that while you were supervising Mr.
12 Castro in that time frame, you were not aware of
13 whether or not blood was tested in Florida?

14 A I cannot remember at this time.
15 I remember that tests were done at Round Lake.
16 That's for sure.

17 Q But you don't remember if tests were
18 ever done in Florida?

19 A No, not really.

20 Q Are you a citizen of the United
21 States?

22 A I am.

23 Q How long have you been a citizen?

24 A Since 1964.



1 Q Is Miami your permanent residence?

2 A That's correct. Legal residence.

3 Q This is where you live, is that
4 correct?

5 A That's right.

6 Q Who are the current stockholders of
7 the company?

8 MR. VELEZ: If he knows.

9 A I can tell you, you know, the ones
10 that are. I know Dr. Santamaria is a stockholder.

11 Q (By Mr. Melville) Do you know the
12 percentage of stock he owns?

13 A Not exactly.

14 Q Is it a large bloc, a small bloc?

15 A I don't really know because they are
16 stocks--how do you call that, that you can--

17 Q Bearer certificates?

18 A Bearer certificates, yes. So I
19 don't know. Mr. Alvarez had some stock, too. I
20 have some stock.

21 Q Yes, you have 14%, you said?

22 A That's correct. And the last time I
23 heard, Mr. Castro has some stock.

24 Q Do you have any idea how much Mr.



1 Castro owns?

2 A Well, I don't know exactly how much
3 he owns.

4 Q Do you have any idea how much he
5 owns?

6 A Well, at the beginning, he was around
7 9%.

8 Q Has anything happened that would
9 change your mind as to that?

10 A I don't know if he sold the stock or
11 not.

12 Q So the last time you knew--

13 A He had nine.

14 Q --nine percent?

15 A Uh huh.

16 (At this point, a process server
17 entered the hearing room.)

18 MR. MELVILLE: We asked the Sheriff
19 to come by today. He has been having trouble
20 finding Dr. Ramos.

21 We have another present for you.

22 (At this point, the process server
23 handed the witness a document which,
24 in turn, was taken by Mr. Velez.)



1 MR. MELVILLE: Thank you for stopping
2 by.

3 (Thereupon, the process server left
4 the hearing room.)

5 MR. VELEZ: Let the record show
6 that some gentleman just came in. I don't know who
7 he is. He handed something to the Doctor while he
8 was sitting here, didn't even bother to read it to
9 him or tell him what it was. So whatever it is,
10 I just grabbed it from the Doctor's hand and am
11 tossing it in my file and we'll take that up at a
12 later date.

13 Q (By Mr. Melville) Getting back to
14 the stock, now--

15 A Yes.

16 Q --Dr. Santamaria owns some?

17 A Yes.

18 Q Or, at least, the last you knew?

19 A That's correct.

20 Q And Mr. Alvarez owns some?

21 A Yes.

22 Q Mr. Castro, the last you knew, owned
23 nine percent?

24 A That's right.

1 Q Is there anyone else that you can
2 think of who owns stock?

3 A I don't know because I don't know
4 if they still hold it or anything like that. I
5 can tell you about the ones that did have stock at
6 the beginning of the company.

7 Q That would be helpful.

8 A That was Mr. Jose Pedro Luis Lopez.

9 Q Pedro Luis Lopez, how much did he
10 have?

11 A I don't know.

12 Q Maybe I can help you.

13 MR. VELEZ: Let me object to you
14 asking any further questions along this line upon
15 the grounds that it's outside the scope of your
16 discovery at this point in time as to ascertain
17 what connection, if any, this corporation had with
18 the State of Florida or has with the State of
19 Florida. So this matter that you are delving into
20 is beyond that scope.

21 I would advise my client he doesn't
22 have to answer any further questions along that
23 line if he so wishes.

24 MR. MELVILLE: All right. Counsel,



1 you have heard testimony along this line already.
2 The door has been opened. Also, the residence and
3 citizenship of the owners of the stock would be
4 on the records of the State of Florida.

5 MR. VELEZ: You know that's an
6 erroneous statement of the law.

7 MR. MELVILLE: I don't believe that
8 is an erroneous statement of the law.

9 Q (By Mr. Melville) Mr. Ramos, are you
10 going to follow your attorney's advice?

11 A Of course. I have to follow.

12 MR. MELVILLE: Certify the question.

13 Well, counsel, are you advising your
14 client that he should not testify anything further
15 in regard to the ownership in regard to the
16 corporate stock?

17 MR. VELEZ: Other than if any stock-
18 holders reside in the State of Florida. But we'll
19 cross that bridge when we get to it.

20 Q (By Mr. Melville) Do any other
21 stockholders reside in the State of Florida?

22 A I don't know.

23 Q At the time the corporation was
24 formed, did any other stockholders reside in the



1 State of Florida?

2 A Yes. Castro resided in the State
3 of Florida. I resided in the State of Florida,
4 and Alvarez resided in the State of Florida.

5 Q Anyone else?

6 A Yes, probably at the time it was
7 formed. Whatever the number of them that resided
8 in the State of Florida at the time it was formed--
9 you're talking about '71--I have to stretch my
10 memory many, many years. The majority of the
11 stockholders did not reside in the State of Florida.

12 Q Who owned the majority of the stock?

13 A At that time?

14 Q Yes.

15 A When it was formed, it was owned by
16 two Nicaraguans.

17 Q Who was that?

18 A Mr. Frank Kelly and Dr. Orlando
19 Santamaria.

20 Q Frank Kelly?

21 A Yes, Frank Kelly, but Kelly is a
22 Nicaraguan.

23 Q Mr. Kelly is an attorney?

24 A I don't know whether he is. I think



1 he is not; he is an engineer.

2 Q Did a Mr. Gomez own part of the
3 stock?

4 A I don't know at this time.

5 Q Are you acquainted with a Mr. Gomez?

6 A I am acquainted with a hundred
7 Gomez.

8 Q How about a Max Gomez?

9 A I am acquainted with one.

10 Q Is he a resident of the United
11 States?

12 A The Max Gomez, yes.

13 Q Is he a citizen of the United States?

14 A I don't know about that.

15 Q Is he a resident of the State of
16 Florida?

17 A Max Gomez, the one that I know, yes.

18 Q The Max Gomez, the one that you know,
19 is he a doctor?

20 A Yes.

21 Q Did he own at any time part of the
22 stock in the company?

23 A I think he did, yes.

24 Q Did Mr. Lopez at any time reside in



1 the State of Florida?

2 A The last time I heard, he resided in
3 Argentina.

4 Q Did he at any time reside in the
5 State of Florida?

6 A Yes. I met him in the State of
7 Florida back in 1960 some.

8 Q Did he reside in the State of Florida
9 in 1971 or '72?

10 A How do I know? I don't know. I
11 really don't know if his residence was here or not
12 at that time.

13 Q Mr. Ramos, in the company--when I
14 say the company, I'm referring to Centro Americana
15 De Plasmapheresis, S.A.--who had the primary
16 responsibility for overseeing the sales of the
17 company's product?

18 A Well, the primary responsibility,
19 as far as I know, was the President of the company,
20 Dr. Jose Rolando Santamaria. And also, Mr. Alvarez
21 had something to do with that. Of course, under
22 Dr. Santamaria because the President of the company,
23 as I explained before, this particular company,
24 holds all the power by Statute.



1 Q I see.

2 A And nothing can be done or nothing
3 could be done because the company practically
4 doesn't exist without his guidance and concern
5 or consent.

6 Q Mr. Ramos, what did Mr. Fausto
7 Alvarez do in regard to the sales of the company's
8 product?

9 A I don't know exactly what he did.
10 He will be responsible for keeping the books, I
11 mean, the bank accounts, etc., etc., supervising,
12 actually supervising the bank accounts and the
13 books there, because actually the direct handling
14 of the books was in the hands of Nicaraguan em-
15 ployees.

16 Q Who did the accounting work for the
17 company?

18 A Well, the last one that did the
19 accounting work for the company was Mr. Espinales.

20 Q Was Mr. Espinales employed by the
21 company?

22 A Yes.

23 Q A full-time employee?

24 A Yes.



1 Q Did Mr. Alvarez supervise Mr.
2 Espinales' work?

3 A Yes. One of his functions was to
4 see Mr. Espinales' work and they have to report
5 to the President of the company.

6 Q Did Mr. Alvarez ever receive any
7 compensation for supervising the work of Mr.
8 Espinales?

9 A Yes, he was under a salary as Secre-
10 tary of the corporation and supervising the books
11 and everything like that.

12 Q Was he paid a fee for doing this
13 supervising of the accounting?

14 A Well, the whole thing was a com-
15 pound salary, I understood, for his different
16 functions, assisting the President in sales.

17 Q Who was responsible for soliciting
18 orders to sell plasma?

19 A Well, what happened, you know, the
20 only authority to handle that was the President
21 of the company.

22 Q Who directly solicited the sales for
23 the company?

24 A Nobody solicited. I mean, go and



1 look. There was a company, a broker that used to
2 handle all the sales. And Dr. Santamaria authorized
3 that broker to handle all the sales.

4 Q Mr. Ramos, at any time, did you call
5 any pharmaceutical company to advise them the
6 company was in existence?

7 A To advise that the company was in
8 existence?

9 Q Yes, and that the company had plasma
10 that it could sell?

11 A Well, if I did, that was a very,
12 very, very long time ago. I didn't have any
13 function in the company. I remember the time that
14 the company--that was before this broker took over--
15 didn't have any way to sell, and I wanted, as a
16 private individual and a stockholder, because I
17 wasn't a director of the company or anything, trying
18 to help and sell. As a matter of fact, I called
19 Hubber to buy some for the company. And then the
20 transactions, of course, I couldn't do the transac-
21 tions for the company because I wasn't a director
22 of the company.

23 Q Did you call Abbott?

24 A I don't remember if I called Abbott,



1 but I might have called. I called everybody.

2 Q In other words, when the company was
3 getting started, you wanted everybody to know you
4 had plasma to sell, right, to help the company?

5 A That's for sure.

6 Q Right. So you would call whomever
7 you thought might be interested in purchasing the
8 company's product?

9 A Sure. If I remember correctly, there
10 was a broker that took over the sales. That was
11 in Canada. Then he got an office in Switzerland.
12 That's interesting. And he was handling every-
13 thing, all the sales for the company. And the
14 name of the broker--one of the directors--but the
15 company name--

16 Q Continental?

17 A It could be Continental. I remember
18 the name of the man, Hech.

19 Q H-E-C-K?

20 A H-E-C-H, I think. The first name,
21 I don't remember. He is not a United States
22 citizen.

23 Q Not?

24 A No, he is not.



1 Q When you called, you know, at the
2 beginning, all of these pharmaceutical companies
3 to let them know you had plasma to sell, did they
4 express any interest in purchasing?

5 A Well, if they were purchasing, I
6 didn't have to, you know, the company didn't have
7 to go through Hech. So whatever I did was a
8 failure.

9 Q Well, did you ever manage to sell
10 any blood without going through Hech?

11 A Well, I remember I used to sell for
12 ABD Plasma and Serum Corporation which was a Florida
13 corporation. I used to sell, and we didn't have
14 any brokers at the time. And I could sell. Of
15 course, that was easy because that was in the United
16 States. When that company was operated in Managua,
17 I don't think I had any luck in selling anything,
18 as far as I could remember, which I could.

19 Q You're not sure if you actually sold
20 any yourself?

21 A I don't believe I did. But that was
22 a long time ago. I can't tell you. If I ever did,
23 it was a very, very small amount, I guess, because
24 otherwise, Hech wouldn't be in the picture.



1 Q Well, now, when would this have been?
2 1972?

3 A '3.

4 Q Early '74 perhaps?

5 A No, no. By that time, Mr. Hech was
6 taking over all the sales.

7 Q Did you contact originally any
8 companies outside of the United States yourself?

9 A Well, Hubber.

10 Q Where is Hubber?

11 A He's in Spain. He was a client of
12 ABD Plasma and Serum Corporation.

13 Q So you knew somebody to call on?

14 A Yes. I wish I could remember his name
15 now. I was there in Spain in '71, and I met all
16 these people in plasma for Hubber.

17 Q You said Abbott or Cutter?

18 A Yes.

19 Q Where are they located?

20 A That Cutter is a new thing. Cutter
21 is located in California. And Abbott, they have
22 offices all over, but one of the offices is in
23 California. Another is in Chicago.

24 Q Did you ever make any of these calls



1 when you were here in the United States?

2 A For the selling of this thing?

3 Q Yes.

4 A It's such a long time ago. I could
5 have made it from Florida, I could have made it
6 from New York, I could have made calls from
7 Nicaragua. I could have made calls to anybody
8 else.

9 Q In other words, anyplace that was
10 convenient for you, you would make a call?

11 A There weren't so many calls. When
12 you try to sell something, you just call. You get
13 an answer yes or no. That's the end of it.

14 So it would be very unfair, you
15 know, to think that I can remember where was the
16 places that I made a call from, you know. I don't
17 know.

18 Q Well, was this part of your function
19 as United States representative to help sell the
20 company's product?

21 A No. You have to place yourself in
22 time. I became representative of the company in
23 1975, at the end of 1975. It could be the month
24 of October or November, 1975. Before that, my



1 capacity was to supervise Mr. Castro.

2 Q Was Mr. Castro the United States
3 representative before you?

4 A Yes, for a few months.

5 Q What months would that have been?

6 A I guess since June, May or June, '75
7 through October or November, '75.

8 Q Sir, why do those months stand out
9 in your mind?

10 A Because I remember. It's a very
11 important year. That was the year that the company
12 got a license from the Bureau of Biologicals with
13 the assistance of Hylan (phonetic) who was the one
14 that assisted the company to do that. That was
15 the year that the company lost a tremendous amount
16 of money. It was in tremendous debts. So it
17 sticks in my mind.

18 Q Now, you said Hylan assisted the
19 company in getting--

20 A Yes, technical assistance.

21 Q The United States import license?

22 A To get a license.

23 Q To import the blood into the United
24 States for sale in the United States?



1 A Well, the way the word came, I don't
2 know legally, I don't know too much, in order that
3 the plasma to be admitted and processed in the
4 United States. That's the correct wording, because
5 the Bureau of Biologicals is not concerned with
6 sales, money exchange, or anything like that. It's
7 concerned that the donor has been taken care of,
8 the sterility in the product, in the final product,
9 and can be used safely in the United States
10 establishment to further process the plasma and
11 the final product to be used by American citizens.

12 Q I see.

13 A Yes.

14 Q What did Hylan do to assist the
15 company in getting this import license?

16 A Well, he sent a crew of people over
17 there. They sent all the forms, necessary papers,
18 the forms that they were using in their own
19 licensed establishment for Centro Americana De
20 Plasmapheresis to copy and translate, and all the
21 guidelines that were necessary in order to obtain
22 that license.

23 Q Where is Hylan located?

24 A In California.



1 Q Is Hylan the full name of the com-
2 pany?

3 A As far as I know, yes.

4 Q Do you know what their address is in
5 California?

6 A I think it's in Costa Mesa.

7 Q Is that H-Y-L-A-N-D?

8 A I don't know if the D is there or not,
9 H-Y-L-A-N or not.

10 Q Now, as United States representa-
11 tive in this May or June of '75 through November
12 of '75 period, what were Mr. Castro's responsi-
13 bilities?

14 A Well, he could answer that better
15 than I can, I guess.

16 Q To the best of your knowledge, what
17 were his responsibilities?

18 A Well, in my end, his responsibilities,
19 what I was concerned of, you know, I will supervise
20 him that he took care, proper care of the donors,
21 proper care of the supplies, proper care of the
22 final product. You know, the technical part.

23 Q Do you know if Mr. Castro ever
24 attempted, you know, to assist the company in the



1 sales of its product in the United States?

2 A I don't think so. I never heard of
3 that.

4 Q Do you know if he ever contacted
5 any drug companies as you had previously done in an
6 attempt to sell the plasma?

7 A Well, he never did any sales, even
8 with ABD Plasma and Serum Corporation. As far as
9 I was concerned, he never did any sales.

10 Q Do you know?

11 A I know he didn't do any sales.

12 Q How do you know?

13 A Because, you see, I was the promoter
14 of the Nicaraguan project myself. I made the
15 contracts. Mr. Castro could not sell anything,
16 never, ever.

17 Q You were the promoter?

18 A Yes.

19 Q Could you explain that to me?

20 A To get the contacts in Nicaragua
21 with Dr. Santamaria, Mr. Kelly, the officers of the
22 government, etc., etc., in order to obtain permits
23 in Nicaragua for the company to operate there.

24 Q Did you help raise the capital



1 necessary to get the company into operation?

2 A Yes.

3 Q How was that raised?

4 A Well, it was raised through proper
5 funds of everyone. And also, we got from, like,
6 a local bank--it's not exactly a local bank, it's
7 a government guaranteed bank. You follow the idea?
8 It's a part of the governmental institution that
9 would guarantee a loan, then the bank will give you
10 the money. And I think the bank was Bank of
11 America.

12 Q Is Infonac partly funded by United
13 States Government money?

14 A No, not at all.

15 Q Are the loans guaranteed by the
16 United States Government?

17 A No. Infonac is a local Nicaraguan
18 institution.

19 Q How do you spell that?

20 A I-N-F-O-N-A-C.

21 Q As far as you know, the United States
22 Government has absolutely nothing to do with
23 Infonac?

24 A No.



1 Q As far as you know, the company
2 was financed through private contributions of
3 stockholders?

4 A Yes.

5 Q And loans from Infonac?

6 A Yes. And credit.

7 Q And credit?

8 A Yes.

9 Q What kind of credit?

10 A Well, for supplies that were given
11 at that time, if I remember correctly, by Travenol
12 International.

13 Q Did they sell supplies on credit
14 to the company?

15 A At that time, yes.

16 Q Where are the offices of Travenol
17 International?

18 A They have an office in Deerfield,
19 Illinois, and they have offices all over the world.

20 Q Was it from the office in Deerfield,
21 Illinois?

22 A It could be that or the Mexican
23 office. I just can't tell you.

24 Q Let's back up for a moment. I



1 believe you're saying that Mr. Castro couldn't
2 sell anything?

3 A No. As far as plasma is concerned, as
4 far as I can remember, even by the time back in
5 1969, when we carried ABD Plasma and Serum Corpora-
6 tion, he didn't do any selling.

7 Q He didn't do any selling for ABD
8 Plasma?

9 A He didn't do any selling, as far as
10 I know. Maybe he told you, but as far as I know,
11 he didn't sell anything. He wasn't involved in
12 selling.

13 Q But you couldn't swear that he did
14 not sell any product?

15 A How can I swear to anything when I
16 wasn't there at all, the time.

17 Q Right.

18 A But my information that I have is
19 that the selling of the company of this Cepsa
20 company were handled through two brokers ninety
21 percent of the time. The first broker was Mr. Hech's
22 company and the second broker is World Distributors.

23 Q What about the other ten percent of
24 the time?



1 A Well, it could have been sales
2 made, small sales to Hubber back in--I don't know
3 when--'73, '72 or something like that. There may
4 have been a sale to Cutter, one sale to Cutter.
5 That's it as far as I can remember.

6 Maybe, I think there was another
7 broker involved, too, by the name of Alfa (phonetic).

8 Q Are you sure?

9 A Yes. And through that broker, there
10 was some sales. Put that down.

11 Q Where is Alfa located?

12 A That Alfa broker was a broker from
13 Nicaragua.

14 Q He's a plasma broker located in
15 Nicaragua?

16 A Yes.

17 Q When did Alfa go into business?

18 A I don't know anything about that,
19 except that I heard that Alfa sold some.

20 Q Who told you?

21 A I think Mr. Castro himself, and Mr.
22 Alvarez, both of them.

23 Q Was Centro Americana De Plasma-
24 pheresis, S.A., the only blood bank in Nicaragua?

1 A No, you're wrong. Centro Americana
2 De Plasmapheresis wasn't a blood bank, it was a
3 plasma company.

4 Q Forgive me. I'm not knowledgeable
5 in the technical aspects.

6 Would it be fair to say that the
7 company, Centro Americana De Plasmapheresis, S.A.,
8 physically took donors and made sure they were
9 healthy, took blood from them? Did they do anything
10 to the blood in Nicaragua?

11 A Absolutely.

12 Q Did they distill it?

13 A The difference between blood and
14 plasma, you take the blood from the donor, and
15 you centrifugate that blood with certain additives
16 in the bags so there is no coagulation. Then you
17 separate the solid part, like, the red cells, the
18 white blood cells and the platelets, and you leave
19 only the plasma. Then you take the plasma which
20 is the product that you're looking for, then you
21 infuse saline in that solid part of the blood as a
22 substitution for the plasma you took out and you
23 return that to the donor. Then after that, you take
24 the plasma and put it at a certain temperature, etc.,



1 etc., until you ship it out.

2 Q Is the plasma normally frozen?

3 A Frozen, yes.

4 Q And the whole blood with the saline
5 is returned to the donor?

6 A That's correct.

7 Q Was the company the only plasma
8 center in Nicaragua?

9 A Yes.

10 Q And Alfa was the plasma broker?

11 A Yes, in Nicaragua. I never had any
12 deals at all with Alfa. I just told you that I
13 heard Mr. Alvarez and Mr. Castro himself mention
14 that some plasma was sold through that broker.

15 Q Now, the sales that were made to
16 Hubber and Cutter not through World Distributors
17 or the Canadian broker--excuse me, let me rephrase
18 the question.

19 You testified that about 90% of
20 sales were through the two brokers you mentioned?

21 A At least. At least 90%.

22 Q And the 10% was--

23 A At the most.

24 Q Was the other business on that 10%



1 of the sales--who made the contacts to make the
2 sales? Yourself?

3 A That 10%, you got Alfa.

4 Q How do you know?

5 A Because I'm telling you. I'm
6 telling you that 90% of the sales were made through
7 Mr. Hech and his company, and World Distributors.

8 Q Right.

9 A That leaves us 10%.

10 Q Right.

11 A Out of that 10%, Mr. Castro himself,
12 and Mr. Alvarez told me that some of that, some of
13 that plasma was sold through Alfa which was a
14 Nicaraguan broker. So you have to subtract a
15 certain percent that was sold by Alfa. That will
16 leave you three, four percent, something like that.

17 Out of the production of five years
18 of the company, out of that production of five years
19 of the company, Hubber may have bought some plasma.
20 How Hubber got that plasma--

21 Q That's my question.

22 A I knew you were going to ask. Hubber
23 was a former client of ABD Plasma and Serum Corpora-
24 tion. I was the one that used to sell for ABD



1 Plasma and Serum Corporation, so I contacted Hubber
2 and Hubber took a certain amount of plasma once
3 or twice, small amounts. Hubber is not a big house.

4 Now, you asked me before if I con-
5 tacted Hubber, if it was from the States or from
6 Nicaragua, and I told you that I don't remember.
7 It could have been from anyplace.

8 Now, another company that we con-
9 tacted was Cutter. Cutter was contacted definitely
10 from Nicaragua. The first call was made from
11 Nicaragua.

12 Q Was Cutter ever called from the
13 United States?

14 A Well, I don't know.

15 Q Did you ever call Cutter from the
16 offices of Fausto Alvarez at 835 Southwest 37th
17 Avenue, Miami?

18 A I may have called Cutter from there
19 or from Nicaragua, Mexico, Chicago, my home or
20 anyplace, not necessarily related with sales, no.
21 As a matter of fact, Cutter was contacted by me,
22 I remember, from Nicaragua on one of my visits
23 there. Then they answered a hell of a long time
24 later.



1 Q Yes?

2 A And then they sent a man over by
3 the name of--let me see if I can remember his name.
4 Davis was his name. The last name was Davis. Davis
5 inspected the place there and then they didn't
6 decide to buy. They waited. Then they finally
7 called Managua and they say at that time they will
8 buy. That was it.

9 Q I believe the initial question was,
10 did you ever call Cutter Laboratories from Fausto
11 Alvarez' offices at 835 Southwest 37th Avenue?

12 A I may have, but I am not for sure.

13 Q For what?

14 A John Hinck is a very good friend of
15 mine. He works for Cutter.

16 Q What is his address?

17 A Well, Berkeley, California.

18 Q Cutter Laboratories?

19 A Yes.

20 Q Do you remember their phone number?

21 A No, that I don't. It's easy. You
22 call John Hinck. And John and I, we have talked
23 about different things, including how was the
24 technical things, plasma in general for his purpose.



1 You see, I have a patent for a scale.

2 Q Yes?

3 A As a matter of fact, I'm doing
4 business with them right now for that scale.

5 Q All right. You would call him?

6 A For many reasons.

7 Q Would you call him, for instance, to
8 discuss how the blood was being collected and
9 the mechanical aspects of it?

10 A No, never. This is established.
11 I'm sorry. Let me tell you, this is established
12 since the very beginning.

13 Q What is established?

14 A You know, when the company buys,
15 not buys, it's going to receive plasma, it issues
16 instructions either through the broker or it can
17 call you directly with the broker's permission.
18 Okay. Then, say, I want a box this way, this way,
19 and everything is established. In exchange, they
20 have to write you a letter, you know, establishing
21 there is a change. A copy of that letter was al-
22 ways sent. If they write you directly in Managua,
23 so the broker authorizes the change. You couldn't
24 do it otherwise.



1 Q Why were you talking to Cutter
2 Laboratories?

3 A I'm telling you, I'm a good friend
4 of John Hinck. We discuss about plasma a lot.

5 Q Did they ever ask you when shipments
6 were coming through?

7 A He didn't have to. He just called
8 Managua.

9 Q Did he ever discuss that with you?

10 A Well, in Managua, yes, one or two
11 times.

12 Q From Miami?

13 A From Miami, no.

14 Q What did you talk about on the tele-
15 phone?

16 A I'm telling you, we discussed about
17 plasma, about my scale, which he is very interested
18 in that scale, fortunately.

19 Q Did you ever discuss the business of
20 Cepsa on the telephone with Mr. John Hinck while you
21 were in Florida?

22 A I don't remember if I ever done that.
23 What business do I have to discuss with him?

24 Q The plasma business?



1 A No, I don't have to discuss plasma
2 business with him. That business is done with the
3 broker.

4 Q Did you call him from 835 Southwest
5 37th Avenue?

6 A If I did, it's returning a call from
7 him or about my scale.

8 Q Why would he call you at that
9 address?

10 A You have to ask him. Why don't you
11 ask him?

12 Q Do you know?

13 A He probably called home. I wasn't
14 home and they directed that call to that telephone
15 number.

16 Q Why would they direct that call to
17 that telephone number?

18 A I go there.

19 Q To 835 Southwest 37th Avenue?

20 A Right.

21 Q Why do you go there?

22 A Because I deal in commodities. I
23 have an electrical appliance business which Mr.
24 Alvarez is also a partner. That business is in



1 Nicaragua, you know. We had meetings there.

2 Q You had meetings at 835 Southwest 37th
3 Avenue?

4 A For the appliance business.

5 Q Did you ever have any meetings at
6 835 Southwest 37th Avenue for the blood bank
7 business?

8 MR. VELEZ: Let me object to the
9 question.

10 Q (By Mr. Melville) I'm sorry, the
11 plasma business?

12 A We never discussed any of the business
13 of anything at that time at that address that I can
14 remember for the simple reason that was very
15 ordinary business. I didn't have anything to dis-
16 cuss with him, whatsoever.

17 Q Is it your testimony, sir, you never
18 discussed the business of Cepsa with Mr. Fausto
19 Alvarez in the United States?

20 A I couldn't say that. We can meet in
21 the street, we can meet at that address, we can meet
22 anyplace. So far as the commentary about the
23 Nicaraguan thing, it is absolutely absurd. We never
24 talked about that. We are both stockholders.



1 Q It would seem absurd.

2 A We talked once in a while. A
3 question will arise, a commentary about Mr. Such and
4 Such of Nicaragua, that an employee of the center,
5 whatever, you know.

6 Q Is there a Telex in Mr. Alvarez'
7 office?

8 A Yes, there is a Telex machine there.

9 Q Did you ever use that Telex machine?

10 A Lots of times.

11 Q For what?

12 A For business, commodity business.

13 Q Did you ever use it on behalf of
14 Cepsa?

15 A No.

16 Q Ever?

17 A No, not that I can remember.

18 Q Sure?

19 A Sure.

20 Q Do you know if Cepsa ever paid any
21 bills for the use of the Telex machine?

22 A I have never been in charge of
23 finances, so I don't know.

24 Q Was there ever a Board of Directors



1 meeting of Cepsa in the United States?

2 A Yes.

3 Q When?

4 A There was one in New Orleans and
5 there was one in Miami.

6 Q When was the one in Miami? Can you
7 tell me, were there any more?

8 A Outside of Nicaragua, I'm not sure
9 if there was a meeting in Guatamala or not.

10 Q When was the one in Miami?

11 A Oh, that was in '75.

12 Q Was there a special reason for the
13 meeting?

14 A Yes, to name a new, to destitute
15 him as a director of the corporation and naming me.

16 Q The meeting was specially called?

17 A Yes, of course.

18 Q By whom?

19 A By the Secretary.

20 Q Mr. Alvarez?

21 A Mr. Alvarez, yes, under the direction
22 of the President. The Statute of the company, the
23 President of the corporation orders the Secretary
24 to call the meeting.



1 Q And who attended the meeting?

2 A Well, the persons that were there,
3 the only ones that I remember, I think Mr. Castro
4 was represented by Mr. Alvarez at that meeting.
5 There was probably Max Gomez there. There was Dr.
6 Santamaria, of course, and myself. And I don't
7 remember any others. There were others there.
8 Some of the stockholders were represented by power
9 of attorney by someone. I think I represented
10 somebody with power of attorney.

11 Q And did Mr. Alvarez state the special
12 reason for calling the meeting?

13 A The meeting was called for that
14 purpose.

15 Q For the purpose of discharging Mr.
16 Castro?

17 A No, there was no discharge of any-
18 thing. He was not going to be a member of the Board
19 of Directors any more. It was going to be set aside
20 as a member of the Board of Directors. It was
21 February of '75. And then I was going to take the
22 place. That's all. It was kind of routine.

23 Q Well, was anything else discussed at
24 that meeting?



1 A Maybe the balance of the corporation.
2 I'm just guessing. The main reason for the meeting
3 was to substitute Mr. Castro as director.

4 Q I don't understand what you mean by
5 the balance of the corporation?

6 A At that time, you know, the
7 President will inform that the corporation is in
8 this, you know, it's to make money or it's not
9 making money; it's in debt or not in debt.

10 Q I see. The finances?

11 A Yes, the finances. A general state-
12 ment of the finances by the President. They
13 weren't any good at that time.

14 Q They weren't any good at that time?

15 A No.

16 Q Have they ever improved?

17 A Yes.

18 MR. VELEZ: Let me object to the
19 question. It's outside the scope of discovery
20 permitted.

21 MR. MELVILLE: I think he already
22 answered.

23 A (Continuing) The equity--

24 MR. VELEZ: Doctor, I advise you,



1 you don't have to say anything on that question.

2 Q (By Mr. Melville) Were there any
3 minutes kept of that meeting?

4 A Yes.

5 Q And who was in charge of keeping the
6 minutes of the meeting?

7 A Well, the Secretary will keep the
8 minutes according to the Statute, and then it will
9 be sent and kept in a vault at Cepsa's office in
10 Managua.

11 Q Were the minutes prepared here?

12 A What do you mean, prepared?

13 Q Typed on a typewriter?

14 A The procedure there is that you take
15 whatever you take. It's outside the United States,
16 a meeting in, like, in Guatamala, New Orleans,
17 then a Notary is the only one that can write in the
18 book, the minutes. They put a seal so the proper
19 book is kept there.

20 Q How does the Notary know what to write
21 in the book?

22 A Because you give a copy back. Let's
23 say there is a meeting in Miami or New Orleans or
24 Guatamala, then the Secretary will write whatever



1 was discussed in the meeting. Everybody will sign.
2 Then it will go to the Notary in Nicaragua. He
3 will put it in the book to transcribe that and
4 testify as a Notary that all the signatures there
5 are recognized, and he will put it down. This is
6 the official thing. Then, the other papers, you
7 just throw it away.

8 Q But, initially, some writing is made
9 here and everybody signs it?

10 A Yes, otherwise he can put whatever
11 he wants.

12 Q Now, was any action taken here in the
13 United States as a result of the meeting?

14 A Well, until the time that it's in the
15 book of the corporation and the Notary writes,
16 the law there is--

17 Q The question was, was any action
18 taken here in the United States as a result of the
19 meeting, yes or no?

20 A No, in the United States, no action
21 was taken.

22 Q Was a letter sent to Mr. Castro as a
23 result of the meeting?

24 A No, not at that time.



1 Q Never?

2 A Wait a minute. You're talking about
3 a meeting in February, '75 that took place in
4 Miami?

5 Q Yes.

6 A You cannot send any letter or any-
7 thing after that meeting. You cannot. You can't
8 do anything until it's in the book of the corpora-
9 tion.

10 Q Then what happens?

11 A Then you can send a hundred letters.
12 Then it's effective.

13 Q Was a letter sent?

14 A I don't know because I wasn't the
15 Secretary of the corporation.

16 Q Do you know if any mail was sent from
17 835 Southwest 37th Avenue listing that as the
18 return address of Cepso?

19 A As far as I know, no.

20 Q You know of absolutely no mail?

21 A No.

22 Q Do you know if Cepso received any mail
23 at that address?

24 A Probably.



1 Q Why?

2 A For the reason that I answered at
3 the beginning of the deposition. The mail in
4 Managua takes a long time. It takes almost ten
5 days that you receive a letter there.

6 Q Ten days from what?

7 A From the date you mail it. Suppose
8 you mail a letter in Washington, D.C., you send a
9 letter to Managua. Chances are at least fifteen
10 to twenty percent, that you will never receive it.

11 Q It's that bad?

12 A Yes. Then, if you receive it, it
13 will take ten days. So the letter could be sent to
14 any intermediate address in the United States in
15 order for somebody to carry that correspondence
16 to Managua by hand with a friend that goes into the
17 plane. We did that a lot in California, through
18 California or also through Miami, yes.

19 Q Was that done on a fairly routine
20 basis to avoid losing things in the mail?

21 A That's correct. People sending the
22 letters to Cepsa, not Cepsa sending letters out.

23 Q How were people informed that should
24 be done, to send it to the Miami address?



1 A I think by word of mouth or something
2 like that.

3 Q Who would physically pick up the
4 mail that was sent to that address?

5 A I don't know. I don't own the place.

6 Q Did Cepsa ever authorize Mr. Alvarez
7 to collect the mail and send it down to Nicaragua?

8 A Formal authorization of any kind,
9 never, as far as I know.

10 Q It was just a custom of doing
11 business?

12 A Not doing business, because, you see,
13 all the letters, for instance, that I received in
14 Cepsa in Managua that comes from advertising com-
15 panies and stuff like that, I don't know if those
16 ones are in my desk because somebody picked it up
17 from California or Florida or Illinois. They were
18 on my desk or they were coming directly through the
19 Post Office of Managua, I don't know.

20 Q But it was not uncommon for mail to
21 be received at 835 Southwest 37th Avenue for Cepsa?

22 A I cannot answer that because I don't
23 own the place.

24 Q Do you know if the Bureau of



1 Biologics ever sent mail to that address for Cepsa?

2 A It could have.

3 Q Did the purchasers of Cepsa products
4 ever write to that address?

5 A Not that I know of these things. I
6 don't know.

7 Q Has Cepsa ever owned a freezer located
8 in the United States?

9 A In my time?

10 Q Well, in your time, has it ever owned
11 a freezer in the United States?

12 A No. When I got to be a responsible
13 head of Cepsa, the freezer is a very important
14 thing because it's where the plasma is. There is a
15 freezer at Lanica Airlines. That freezer is not
16 owned by Cepsa.

17 Q Has it ever been owned by Cepsa?

18 A I don't know.

19 Q Did you ever own that freezer?

20 A No.

21 Q Did anyone of your companies ever
22 own that freezer?

23 A Wait a minute. Let me see. Let me
24 remember. The only thing that I know is the freezer

1 is at Lanica and is presently owned by Lanica. The
2 freezer does not belong to Cepsa, never, because
3 Cepsa does not own it, and I'm in charge of
4 shipping.

5 Q You are in charge of shipping?

6 A Yes, from Managua, as part of my
7 responsibility, to supervise the shipping and
8 everything that is sold to World Distributors, the
9 broker, at Managua Airport. So by the time that it
10 takes the airplane from Managua, all the plasma
11 does not belong to Cepsa.

12 Q Let's get back to the question I
13 asked awhile ago. Did you ever own that freezer
14 or did a company that you owned ever owned that
15 freezer?

16 A I'm a stockholder of Cepsa. I don't
17 own a company.

18 Q Did you ever own that freezer?

19 A I don't remember.

20 Q You don't remember?

21 A Honest to God.

22 Q Yes?

23 A Honest to God, I don't remember.

24 Q You don't remember, really?



1 A No, really, I don't remember.

2 Honest to God, I don't remember.

3 Q Do you recall if the freezer was
4 owned by a business that you had an interest in
5 previously?

6 A I have no recollection whatsoever
7 of how that freezer got to Lanica.

8 Q Do you know if Lanica ever paid any-
9 thing for the freezer?

10 A I don't know. Probably this happened
11 in 1973 or '74. It was not part of my function,
12 so on.

13 Q Then, really, you don't know if Cepsa
14 owns that freezer?

15 MR. VELEZ: Objection. He already
16 told you Cepsa doesn't own it.

17 A Cepsa doesn't own it.

18 Q (By Mr. Melville) How do you know
19 that Lanica owns it?

20 A Because it's under the Port Authority.
21 Lanica has that thing in the Port Authority according
22 to rules here in the States. Everything that is
23 in anyplace leased by the Port Authority has to
24 belong to the one that is leasing the place.



1 Q Did anybody from Cepsa, any employees
2 of Cepsa ever check the freezer to see if the
3 temperature was maintained?

4 A We wouldn't fly anybody from Managua
5 here.

6 Q Did any employee of Cepsa ever check
7 the freezer to make sure the freezer was correct,
8 the temperature?

9 A An employee of Cepsa?

10 Q Yes.

11 A No.

12 Q Did Enrique Torrens ever check?

13 A I don't know.

14 Q How about Sabates?

15 A I don't know.

16 Q Alvarez?

17 A You have to ask him.

18 Q How about yourself?

19 A I never checked the freezer.

20 Q Do you know if there is a sign on the
21 freezer who to notify in case of a malfunction?

22 A Yes.

23 Q Tell me about that?

24 A When the sign was placed--I never



1 received any calls because I was instructed by the
2 broker to do that as a favor to them, if anything
3 goes wrong on the freezer, because it would be a
4 loss for the broker.

5 Q Absolutely. So what does the sign
6 say?

7 A The sign says in case something
8 happened, but I know my name is there.

9 Q Your name is on the freezer?

10 A It was to call me, Pedro Ramos if I'm
11 in town to see if the temperature goes up. But it's
12 not a function of Cepsa because the plasma in the
13 freezer does not belong to Cepsa.

14 Q You would be doing that as a favor,
15 then?

16 A That's right.

17 Q Not in your official capacity?

18 A Absolutely.

19 Q Do you know if Mr. Alvarez' name
20 is there?

21 A Could be. I don't know.

22 Q Is there a telephone number on there?

23 A My telephone number is there, yes.

24 Q Your home telephone number?



1 A Probably.

2 Q As I understand, the plasma must be
3 kept frozen for it to be good?

4 A That's correct.

5 Q And if the freezer malfunctions--

6 A The plasma loses a lot.

7 Q All right. The plasma might be
8 ruined, for instance?

9 A That's correct.

10 Q So to insure that doesn't happen,
11 if there is a malfunction, you were to be called?

12 A I'm one of the persons to be called.
13 If I am called, I immediately notify the broker.
14 That's it. A favor.

15 Q The broker is in Panama City, Panama?

16 A Yes. I notify him that it happened.
17 If he directs me--it never happened, but then, I
18 notify him. Suppose that plasma is to be shipped
19 to whatever, Hylan. Then I do a favor to notify
20 Hylan that the plasma of Hylan that is in that
21 freezer or is for Hylan in that freezer from World
22 Distributors, there is a malfunction of the freezer.

23 But honest to God, I don't have
24 experience of anything of that matter to have



1 happened. This thing that I can testify to is that
2 plasma in that freezer does not belong to Cepsa.

3 Q How do you know?

4 A Because I am in charge of shipping
5 from Managua. My instructions are to ship to the
6 airport. Our responsibility is until the plasma
7 is inside the plane of Lanica Airlines or whatever
8 carrier is going to take it, and that's it. Cepsa
9 does not have responsibility whatever for what
10 happened to that plasma after that.

11 Q Has Cepsa ever received payment
12 directly from any purchaser of plasma?

13 A Directly?

14 Q Directly?

15 A Well, if it was sold to Hubber,
16 when it was sold to Hubber, and it was Cepsa that
17 sold it directly, yes. If it was sold through a
18 broker, it has to be paid by the broker.

19 Q If the payment came directly to Cepsa,
20 would they send it to Miami?

21 A You see, I'm not sure. I have never
22 been in charge of the funds.

23 Q So you don't know?

24 A If it was sent here from the broker

1 or from whoever sent it here, I don't know.

2 Q I see. So you truthfully can't
3 answer where the payments for the purchase of
4 the blood are sent, the purchase of plasma are
5 sent?

6 A The money, you mean?

7 Q Yes.

8 A No. I know for a fact that it was
9 an account that was moved daily, two accounts in
10 Managua, and the money have to come to Managua
11 to those banks. Somebody sent that money because
12 otherwise we couldn't be writing checks against
13 that.

14 Q You say there were two accounts that
15 were moved daily? What do you mean by daily?

16 A Not literally.

17 Q What do you mean by moved?

18 A That we used two banks.

19 Q Do you know if Cepsa ever had a bank
20 account in the United States?

21 A Yes.

22 Q In Florida?

23 A Yes.

24 Q In Miami?



1 A Yes.

2 Q Do you know where the bank accounts,
3 bank account or bank accounts were?

4 A There was one at, I don't remember,
5 one at Southeast.

6 Q Southeast First National Bank of
7 Miami?

8 A Yes.

9 Q Was there an account at the Bank of
10 Miami?

11 A Yes. That could have been a long
12 time ago.

13 Q Was there an account at the Sun Bank
14 of Riverside?

15 A There could have been.

16 Q Do you know?

17 A I don't remember for sure. Any
18 bank that you mentioned, it could have been.

19 Q You don't know?

20 A Southeast, I know.

21 Q Is that Southeast bank account still
22 open?

23 A I guess there is one open there.

24 Q What was done with the money in those



1 bank accounts?

2 A You have to ask Mr. Alvarez about
3 it, not me, because I never direct any payments.

4 Q Did you ever write any checks for
5 Cepsa?

6 A Write the checks, never. I have
7 signature on that and I might have signed a check
8 or two. Maybe five checks.

9 Q Total?

10 A Yes, total because Dr. Santamaria
11 will sign a check and will request me to sign the
12 check in Managua, not here. I never sign a check,
13 a checkbook. I have from Cepsa in the United
14 States never seen it.

15 Q I'm a little confused at your
16 answer. You have never seen a checkbook in the
17 bank account of Cepsa in the United States?

18 A I have seen it in Managua, the
19 checkbook in Managua of an account of Cepsa that
20 I remember at Southeast. You mentioned that it
21 could also be--

22 Q Bank of Miami?

23 A It could have been.

24 Q Sun Bank of Riverside?

1 A But I never seen any of those check-
2 books in the United States, not even in Florida.

3 Q You have always seen it there?

4 A That I can swear.

5 Q Was the only checkbook you have
6 ever seen of Cepsa the checkbook of First National
7 Bank of Miami?

8 A No, I probably have seen others.
9 It had different colors, the checkbooks. I never
10 had the curiosity to see if there were.

11 I think you're right. There was an
12 account at the Bank of Miami, yes, but in actuality,
13 I don't think there is one because I don't remember
14 for the last six, seven months ever seeing a
15 checkbook of the Bank of Miami.

16 Q Have you written or signed any checks
17 in the last six or seven months?

18 A Maybe.

19 Q Do you recall what banks they were
20 written on?

21 A Southeast.

22 Q Do you recall what the checks were
23 written in payment of?

24 A I really don't know.



1 Q You don't recall?

2 A No. Honest to God, I don't. I wish
3 I could say, but I just can't.

4 Q Have you ever received any dividends
5 from the company?

6 A Oh, yes.

7 Q Were the dividends on checks written
8 on any of the United States bank accounts?

9 A Let me tell you, I can't remember
10 that if it was bank accounts of the United States
11 or bank accounts of Managua or bank accounts of
12 Panama or whatever bank accounts.

13 The last time that I received
14 dividends from Cepsa was in 1975. After 1975, I
15 have not received one single penny of dividends
16 from Cepsa.

17 Q Do you know if anybody has?

18 A Well, I will be very mad to know that
19 anybody received any dividends and I didn't receive
20 any.

21 Q Did you ever receive a dividend
22 check while you were in the United States?

23 A If I received? Somebody hand it to
24 me in the United States?



1 Q Yes.

2 A They could have given me a dividend
3 in Managua or given it in Mexico or they could have
4 given it to me a dividend in the United States.

5 Q Somebody handed you a check?

6 A It could have been anyplace.

7 Q Did you draw a salary from Cepsa?

8 A Yes.

9 Q Was that paid by check?

10 A Not necessarily.

11 Q How else would you have been paid?

12 A Cash.

13 Q If you were paid by check, would the
14 check have been drawn on a United States bank?

15 A Not necessarily.

16 Q It could have been either a United
17 States bank or a Managua bank?

18 A Usually, through a Managua bank if
19 it was a check. If it was cash, cash was given to
20 me.

21 Q Right.

22 A I don't have a bank account.

23 Q You don't have a bank account?

24 A No, I don't.



1 Q How would you cash a check?

2 A This is the problem. That is why I
3 rather have the check in cash because if I receive
4 a check, you know, it's a problem for me. I have to
5 give it to somebody, you know, that do me the favor
6 of cashing the check and giving me the money.

7 Q Did you ever receive cash payment of
8 your salary in the United States? Did anybody
9 ever hand you cash dollars in payment of your
10 salary?

11 A My salary from Managua?

12 Q Your salary from Cepsa?

13 A Yes. I remember one day, Dr.
14 Santamaria bring some money, cash, to me from
15 Managua and he gave the money to me at Denny's
16 Restaurant in front of the airport. That I
17 remember.

18 Q Did that happen just one time?

19 A Just one time that I can remember.

20 Q Did you ever receive a check in the
21 United States in payment of your salary?

22 A I can't testify to that because I
23 don't remember. I don't remember exactly. It may
24 have. Carry the check over?



1 Q Yes, carry the check to you?

2 A No. If it's a check, usually, I
3 get a check. The checkbook is in Managua, so I
4 carry the check in my pocket, etc., and bring it
5 to the States which is a different story.

6 Q Right. I understand. Was there
7 ever a time when you were here in the United States
8 for some reason and Dr. Santamaria or someone else
9 would carry a check up here and give it to you?

10 A No. I remember--now you are re-
11 freshing my memory--that on one occasion I received
12 one by mail. I was furious because the mail is so
13 bad. I say, "How can you send a check by mail? It
14 will get lost."

15 Q I see. Does Fausto Alvarez draw a
16 salary from the company?

17 A I believe he does.

18 Q Do you know if he ever received a
19 check in the United States?

20 A You have to ask him.

21 Q Does he ever take cash for salary
22 or does he have a bank account?

23 A You ask him. Whatever concerns
24 somebody else is hearsay.



1 Q You're watching too many lawyer
2 shows.

3 A A hell of a lot of them.

4 Q How did Cepsa buy its supplies?

5 A Well, I told you at the very be-
6 ginning of this deposition that one of my
7 responsibilities is to know at all times the
8 supplies are there, ready. I give the orders, you
9 know. Cards are kept by Mr. Flores, and he will
10 order the supplies.

11 Q How does he order the supplies?

12 A That's his problem.

13 Q You don't have any idea?

14 A No. He knows that he's got to
15 receive reactors from Maryland. He will call
16 Maryland or send a Telex to Maryland for that
17 supply or Texas or California, whatever place it
18 is.

19 Q Daco Enterprises, where did you first
20 hear of Daco Enterprises?

21 A I don't remember when I first heard
22 about it, but I have heard of Daco Enterprises.

23 Q Do you know if Cepsa buys anything
24 from Daco Enterprises?



1 A It may.

2 Q Do you know?

3 A No, I don't know for a fact.

4 Q Do you know if Cepsa buys anything
5 from Daco Distributors, Inc.?

6 A It may.

7 Q Do you know?

8 A I don't know for a fact.

9 Q Do you know for a fact if Cepsa buys
10 anything from any particular company?

11 A Yes, it buys from Travenol.

12 Q What does it buy?

13 A Bags and other things from Travenol.

14 Q How does it place the orders with
15 Travenol?

16 A It's a routine. It's a contract,
17 a yearly contract. You calculate how much you're
18 going to use. They'll send it periodically.

19 Q And where does Travenol send the
20 stuff from?

21 A Some from Colombia, some from
22 Mexico, some from Deerfield.

23 Q How is Travenol paid?

24 A How is it paid?



1 Q Yes.

2 A I guess with money.

3 Q That's normally what's done, yes.

4 Do you know if it's a check by wire, by cash?

5 A I don't handle that end. I never
6 did.

7 Q So you don't know?

8 A I don't know.

9 Q Do you know if Fausto Alvarez and
10 Associates ever did any accounting work for Cepsa?

11 A No. As far as I know, no. That's
12 all I can say.

13 Q Do you know if National Accounting
14 ever did accounting work for Cepsa?

15 A I doubt it.

16 Q Do you know?

17 A No, I don't know.

18 Q Did Cepsa ever have an American
19 Express credit card?

20 A Yes.

21 Q Do you have one of those cards?

22 A Yes.

23 Q Do you have that card with you?

24 A Yes.



1 Q What is the card number?

2 A I don't have it with me at this time,
3 but I have an American Express credit card for
4 Cepsa.

5 Q What was it used for?

6 A If I have to travel outside the
7 States, outside of Nicaragua, so I need a hotel
8 room or anything like that in Chicago or in
9 California or in Guatamala or in Mexico, not to be
10 used in Florida.

11 Q Never used in Florida?

12 A As far as I remember, no. There
13 was no necessity for it.

14 Q What did you do in Chicago?

15 A I go see with Travenol about the
16 supplies.

17 Q Supplies for the company?

18 A Not buying. Inspecting, getting the
19 mechanics.

20 Q So you go up there to inspect that
21 which was going to be sold to Cepsa?

22 A Not really. Just the way shipments
23 are going to take place.

24 Q Did you discuss the general corporation



1 business?

2 A In Chicago?

3 Q Yes, with Travenol?

4 A Any duties, I'm talking about cor-
5 porate duties, my business is to insure that I have
6 the supplies, that the supplies are proper, etc.,
7 etc. Other times, I make suggestions in changing
8 the bags, the weight I want, etc., etc., yes.

9 Q Did you do this on a periodic basis?

10 A I won't say periodic.

11 Q Occasionally?

12 A Occasionally.

13 Q About once a month maybe?

14 A No, not once a month.

15 Q How often?

16 A About once or twice a year.

17 MR. VELEZ: I'm letting you get into
18 that, but that's Illinois, that is not Florida.
19 And that's a totally different ball game.

20 MR. MELVILLE: If Mr. Ramos is the
21 United States representative and he resides here,
22 I believe we are all familiar with that line of
23 cases.

24 MR. VELEZ: No, we are not, if you



1 are telling me about them, because it's new to me.
2 I must have fallen asleep during that class.

3 MR. MELVILLE: Yes, you did.

4 A (Continuing) I can't go to Chicago.

5 Q (By Mr. Melville) You can do any-
6 thing you want, Mr. Ramos.

7 Did you go any other place in the
8 United States on behalf of Cepsa?

9 A Yes.

10 Q Where?

11 A I've been in California.

12 Q Where?

13 A In Costa Mesa.

14 Q Is that Hylan?

15 A Yes.

16 Q For what purpose?

17 A Also for the same thing, for sales
18 that they send to Managua, that the things, you
19 know, the supplies are proper. Also, at the re-
20 quest of the laboratory, at the invitation by
21 them. Social. They tried to be friendly.

22 Q Sure. Anywhere else in the United
23 States?

24 A To New York.



1 Q For what purpose?

2 A In order to explore the possibility
3 of selling the company.

4 Q Selling the company?

5 A Uh huh.

6 Q You mean, the whole thing?

7 A The whole thing, yes.

8 Q Who did you talk to there?

9 A I talked to a broker. His name was
10 Von Einstein (phonetic).

11 Q Do you recall the company he worked
12 for?

13 A No. Honest to God, I don't. I
14 was directed by the President of the company to go
15 there on a mission because it was a possibility
16 of selling the company, and the President directed
17 me to go there.

18 Q When was this?

19 A About a year, year and a half ago.

20 Q Did you use the American Express card
21 to pay for expenses while you were there?

22 A Yes.

23 Q And the same for Chicago?

24 A Yes.

1 Q And the same for California?

2 A Yes. Maybe California. Usually,
3 Hylan paid for it.

4 Q Did you ever go to Round Lake,
5 Illinois?

6 A Yes, Illinois.

7 Q And for what purpose?

8 A To see the way that the tests were
9 done at the very beginning. Also, to get infor-
10 mation, general information of the way that things
11 are run. You know, when you're in this business,
12 you go places to see the way the other people do
13 things so if you like what they do or you think you
14 do it better or whatever, you know. I've gone to
15 Europe, also, with the American Express.

16 Q To see whom?

17 A To visit different laboratories
18 there.

19 Q Which laboratories?

20 A Kabi, K-A-B-I.

21 Q Where are they located?

22 A In Stockholm. Bernwerker (phonetic)
23 in Germany.

24 Q Were they laboratories that purchased?



1 A No, no, not for selling or buying
2 or anything like that. It's a visit like you go to
3 a seminar to learn.

4 Q To learn how they use plasma?

5 A Yes, to see how they are run, their
6 centers, to instruct yourself, to learn.

7 Q Anyplace else?

8 A In Europe.

9 Q Yes.

10 A To Hubber for the same purpose.

11 Q Would that have been in Barcelona,
12 Spain?

13 A Yes.

14 Q To see how they use the plasma?

15 A Not only how they use the plasma,
16 how the whole procedure is and how they run their
17 centers similar to ours, to learn from them.

18 Q In other words, their plasmapheresis
19 centers there?

20 A Yes.

21 Q To see their techniques, if you're
22 good or better, exchange information?

23 A Correct. You're absolutely right.
24 For the same purpose I was going to Hylan in



1 California.

2 Q Did you ever go to Armour Pharma-
3 ceuticals?

4 A Never.

5 Q Did you ever hear of them?

6 A I heard of them. I used to sell to
7 Armour when I was at ABD Plasma and Serum Corpora-
8 tion.

9 Q Do you know if they ever bought any-
10 thing from Cepsa?

11 A I can't remember. They may have at
12 the very beginning. They may have bought something.

13 Q So you went to Cutter Laboratories
14 in Berkeley, California?

15 A Yes.

16 Q For the same purpose?

17 A For the same purpose that I told you.

18 Q And to--

19 A Hylan.

20 Q Hylan. Is Hylan the same thing as
21 Travenol or not?

22 A No.

23 Q They are separate?

24 A You see, Baxter--you're getting me



1 into the corporate structure--Baxter is the main
2 company for Travenol, Travenol International, and
3 then they have subdivisions like Hylan, but they
4 all work as separate entities.

5 Q So you went to Travenol, Hylan in
6 Los Angeles? That is strictly Hylan?

7 A Strictly Hylan.

8 Q Did you go there?

9 A I've been there, yes.

10 Q For the same purpose?

11 A Yes. I have explained to you.

12 Q I'm just trying to make sure that I
13 understand all the companies.

14 A Yes.

15 Q And I'm sorry if I've forgotten,
16 but did you mention Abbott Laboratories?

17 A You keep picking on Abbott. I don't
18 remember selling anything to Abbott or if the
19 company sold anything to Abbott. It may have,
20 but if it ever did, it was through a broker.

21 Q Did you ever go to Abbott in
22 California, or Los Angeles?

23 A One day about two years ago,
24 probably, that I was visiting Hylan. I remember



1 that I received a call from Gordon Barron.

2 Q From whom?

3 A That's Gordon Barron, B-A-R-R-O-N.
4 Gordon Barron called me at Hylan.

5 Q Competition?

6 A It doesn't matter. He called
7 Managua and Managua informed him that I was at
8 Hylan. He said, "What are doing here?" I said,
9 "I come here because I have been invited to visit
10 the place. They have new centers they want me to
11 see."

12 Q To look at the different plasma-
13 pheresis centers?

14 A That's right.

15 He said, "I would like to see you."
16 The next day, he came by. He came by with a man
17 by the name of Greece (phonetic). The first name, I
18 don't remember. They took me over to the place
19 they had nearby, Abbott Diagnostic. I was visiting.
20 It was just diagnostic. He was trying to get me
21 into buying for Cepsa their reactors for hepatitis,
22 which Cepsa never did.

23 Q Can you tell me of any other labora-
24 tories or pharmaceutical companies that you visited



1 either to learn things or to inspect the goods that
2 would be sold to Cepssa?

3 A Honest to God, I don't remember. I've
4 been in Mexico, in centers in Mexico, also for the
5 same purpose. They have plasma freezing centers in
6 Mexico. They are not any good.

7 Q I wouldn't know a good one from a
8 bad one.

9 A I've been to the fractionation plant
10 of Hylan in Mexico. That was several times.

11 Q Were you employed full-time by Cepssa?

12 A I was employed by Cepssa--the word
13 full-time means I was employed by Cepssa and I was
14 responsible for whatever happened in the technical
15 aspects of Cepssa, but didn't own Cepssa because I
16 have my own medical practice in Florida which was
17 the understanding of Cepssa, that I was not going to
18 resign to that at all. And by the time I was in
19 Florida, I will take care of my medical practice or
20 whatever business I wanted to. Then when I go to
21 Managua, I take care of Cepssa. That was the under-
22 standing.

23 Q Or when you travelled for Cepssa?

24 A I have travelled to many places on



1 behalf of Pedro Ramos.

2 Q But the places you mentioned here
3 were for Cepsa?

4 A Yes.

5 Q Were most of those travels under
6 your American Express card?

7 A Yes.

8 Q Do you know where the bills were
9 sent by American Express?

10 A I didn't have to pay for those, no.

11 Q Do you have any idea what kind of
12 books and records Cepsa kept?

13 A Yes.

14 Q Would you tell me?

15 A All kinds of books. They have to
16 keep books of the corporation, the book of acts
17 of everyone, every stockholder meeting or whatever.
18 It has to be kept of the directors' meetings, that
19 is, the corporate papers that have to be kept in a
20 vault. And also, the bank accounts, the checkbooks,
21 as I told you, and all kinds of papers, for heaven's
22 sake.

23 Q Did you ever see any of those papers
24 in the United States?



1 A No.

2 Q Never?

3 A Never.

4 Q When the plant of Cepsa was burned in
5 Managua, do you know if anyone rescued any of those
6 papers from the plant before it was burned?

7 A No. As a matter of fact, I wasn't
8 there, fortunately, because I would have been dead
9 by now.

10 Q Apparently so, yes.

11 A But as far as I know, as far as I
12 have been informed, there is no papers left.

13 Q As far as you know, as you have been
14 informed, everything is destroyed?

15 A Is destroyed, yes, corporation
16 books, everything.

17 Q All of the invoices?

18 A Everything.

19 Q Every piece of corporate paper?

20 A That is what I have been informed.

21 Q Were you served with a subpoena
22 duces tecum to this deposition?

23 A Yes.

24 Q Did you look in your home for any



1 of those papers?

2 A Yes. I didn't have anything.

3 Q Did you look anywhere else?

4 A I looked even in my medical office,
5 of all places.

6 Q Found absolutely nothing?

7 A Nothing at all.

8 Q Did you look any other place other
9 than your home and medical office?

10 A I didn't have to.

11 Q Did you ask Fausto Alvarez?

12 A I didn't ask him anything.

13 Q Did you look in his office at all?

14 A Well, I'm not allowed to look in the
15 office that doesn't belong to me.

16 Q Did you look in his office?

17 A No, I didn't look in his office.
18 Really, I didn't.

19 Q Other than the one Board of
20 Directors meeting which you testified about in
21 Miami--

22 A I didn't testify about any Board of
23 Directors meeting, I testified about a stockholders'
24 meeting.



1 Q I stand corrected.

2 A It was a stockholders' meeting in
3 February, '75.

4 Q Do you recall any other stockholders'
5 meeting in Florida other than that one?

6 A None.

7 Q Do you know if the Board of Directors
8 of Cepsa ever met in Florida?

9 A Yes.

10 Q When?

11 A That was in October, 1975.

12 Q And what was the reason for that
13 meeting?

14 A Dr. Santamaria came over from
15 Managua. He said that we have to have a meeting.
16 And Mr. Castro was called to the meeting. He did
17 not attend. As a matter of fact, he stayed in
18 my medical office at 1981 Southwest 8th Street.

19 Q He stayed in your office when the
20 meeting was being held?

21 A Yes. He didn't show up. Dr.
22 Santamaria proposed to wait for him for about an
23 hour, he said. Well, he wasn't there. He was to be
24 notified by mail that he was destituted for



1 responsibility and destitute of general manager.

2 And then it was according to that. Then I went to
3 my office. Castro was there. I called him in and
4 I let him know what happened.

5 MR. VELEZ: Let me interject some-
6 thing. I want to clarify this.

7 Doctor, when you use the word
8 destitute, do you mean removed?

9 THE WITNESS: Removed, fired.

10 Q (By Mr. Melville) That's what I
11 understood it to mean.

12 A He was fired. I told him that was,
13 you know, Dr. Santamaria's word, etc., etc. Then,
14 of course, it wasn't official because it cannot be
15 official until it is written by the Notary in the
16 book, etc., etc., etc., as I explained to you
17 before. So he was removed verbally. He knew he
18 was removed. And then he went over to Managua,
19 Mr. Castro did. And then Dr. Santamaria was already
20 there. And he was, you know, everything was then
21 put in the book legally, etc., etc.

22 He was not allowed to enter the
23 premises. I wasn't there at that time. And then
24 days later, I went to Managua, then I took



1 possession of the position.

2 Q Why did Dr. Santamaria say there
3 needed to be a meeting?

4 A He didn't say there needed to be a
5 meeting. As a matter of fact, he came--he holds
6 all power as President of the corporation. I said
7 that several times. And then he notified us that
8 it was his decision to fire Mr. Castro.

9 Q Well--

10 A Which doesn't necessarily mean to
11 fire Mr. Castro as a stockholder because he couldn't
12 do that. He was a stockholder. And as far as I
13 know, he is still a stockholder. But he was taken
14 from the position in the company that he did have.

15 Even I could have been removed at
16 any time. It's like you work for Sears, and one
17 day, Sears fires you.

18 Q How did Mr. Santamaria call the
19 directors' meeting? Did he personally come to your
20 home and tell you, did he call?

21 A As a matter of fact, he called on the
22 phone. He says he wants to have a meeting from
23 Managua. He wants to have a meeting with Castro
24 and with me and with Alvarez. And then because he



1 was unsatisfied with Castro, etc., etc., for many
2 reasons that I don't want to mention here because
3 they are very sad. Okay. Then he says that he was
4 coming over to Florida, period. So he came here.
5 Then he called us. "Let's have a meeting." Then
6 I don't know who notified Castro, I don't know if
7 it was Santamaria or it could have been me, I don't
8 know, to attend at a certain hour like 11:00--

9 Q At night?

10 A No, in the morning. To attend the
11 meeting that the four of us were going to have.
12 Then Castro didn't go to the meeting, and Santamaria,
13 at that meeting, in the words he said, "I'm going
14 to fire Castro. That's it. And he hasn't shown
15 up. If he had come here and defended his position
16 of what my charges are against him that it would
17 be. You, Ramos, go and notify him." I mean,
18 Castro. I was the one that notified him.

19 So it wasn't something official at
20 the time because it was not official until the
21 Secretary has to notify him, not me. It wasn't my
22 function. I just told him that he was fired by
23 Santamaria.

24 As a matter of fact, he didn't



1 believe that legally Santamaria could have done
2 that. That is why he went to Managua, I believe,
3 trying to go into the place.

4 Q What were Dr. Santamaria's charges
5 against Mr. Castro?

6 A That would be hearsay.

7 MR. VELEZ: Now, you're going out-
8 side the scope of discovery. I'm going to have
9 to advise him at this point in time he doesn't have
10 to answer that if he so wishes.

11 A I don't want to answer that, first,
12 on advice of my counsel, and second, I don't want
13 to offend anybody. I'm not here for that purpose.

14 MR. MELVILLE: Please certify the
15 question.

16 A (Continuing) I want to say, also,
17 that I didn't offend anybody myself. I mean,
18 Dr. Santamaria was very unhappy.

19 MR. MELVILLE: I want a separate
20 sheet showing the certified questions.

21 Q (By Mr. Melville) Do you know why
22 Mr. Castro stayed in your office when this im-
23 portant meeting was going on?

24 MR. VELEZ: Let me object to that.



1 I've let you go far afield in this matter. The
2 purpose of this deposition is to establish the
3 minimal contacts and issues concerning jurisdiction.
4 It seems to me now you're getting into something
5 with regard to the merits of the Complaint that
6 is beyond the scope of discovery permitted.

7 I'm going to advise you that you
8 don't have to answer any questions along these
9 lines or anything concerning this line of inquiry
10 that you're getting into now.

11 A I'll do what my lawyer says.

12 MR. MELVILLE: Please certify the
13 question.

14 Q (By Mr. Melville) Mr. Ramos, do you
15 know if a letter was sent to Mr. Castro notifying
16 him that he was terminated?

17 MR. VELEZ: I'm going to object upon
18 the same grounds.

19 A I'm going to answer that because I
20 just don't know.

21 Q (By Mr. Melville) Sir, was this the
22 only Board of Directors meeting of the company held
23 in Florida, to your knowledge?

24 MR. VELEZ: Let me object to the form

1 of the question. Number one, you're characterizing
2 it as a Board of Directors meeting and it was not
3 and number two, you're being repetitious.

4 MR. MELVILLE: No, sir. I asked him
5 previously if there was ever a Board of Directors
6 meeting held in Florida. He said yes.

7 A No. I will say perhaps I misunder-
8 stood you that the directors meet here. And I
9 gave you a story, the total story that Santamaria
10 came. We got a meeting. At that meeting there was
11 physically present three persons that belonged to
12 the Board of Directors, and requested the fourth
13 person that didn't belong, to attend the meeting
14 of persons to discuss a matter.

15 Okay. Now, it was not anything
16 written officially at that time or anything like
17 that because it wasn't legal. Legal is when he
18 goes to Managua and puts it in the damn book that
19 I have been talking about.

20 MR. MELVILLE: I object to the answer
21 and move to strike what is legal and illegal. He
22 may be a very fine doctor, but it's up to the Judge
23 to decide what is legal.

24 A I'm talking about a Nicaraguan



1 corporation. A Nicaraguan corporation, nothing is
2 legal until it's written in a book, certified by a
3 Notary and signed by a Notary. It's a particular
4 book, official.

5 Q (By Mr. Melville) Is this book done
6 in stone?

7 A Every page has a number and a seal.

8 Q Sir, were there any other meetings
9 of persons who were directors of the company, in
10 Florida, to your knowledge?

11 A A meeting to talk about Cepsa, you
12 mean?

13 Q Yes, sir.

14 A No, not as far as I can remember.

15 Q That was the only one time?

16 A That time we were supposed to have a
17 meeting of four persons. Three persons of the Board
18 of Directors of Cepsa and one that was not.

19 Q Who was the non-director?

20 A Mr. Castro.

21 Q Has there ever been a meeting of the
22 officers of Cepsa in Florida, to your knowledge?

23 A Not as such.

24 Q No formal meeting?



1 A Not as such. I repeat, that means
2 Dr. Santamaria can come to Florida for any reason
3 whatsoever, to take his children to Disneyworld,
4 whatever, and we meet if I'm here. But this is a
5 social thing.

6 Q Did you ever discuss the business
7 of Cepsa while in Florida with Dr. Santamaria?

8 A No, I didn't have to. That was the
9 only occasion that he mentioned that he was going
10 to fire Castro.

11 Q Is it your testimony that you have
12 never discussed the business of Cepsa with Dr.
13 Santamaria while you were both in the State of
14 Florida?

15 A It is absolutely logical two persons
16 working for a company, one is the President of the
17 company, and even if they are in a social gathering
18 --let me finish--like having, for instance, once
19 in awhile it doesn't come up something referring to
20 the company. That's very logical.

21 Q So you have discussed business of
22 Cepsa in Florida with Dr. Santamaria?

23 A Not discussed the business. We could
24 be in a social gathering and something has come up



1 like, "Pedro, do you know that Mr. Such and Such
2 that works there has three times hasn't come to
3 work on time?" Something like that.

4 Q Would you characterize that as a
5 discussion of the business?

6 A I don't know how you characterize it.
7 You are the lawyer. I'm telling you that could
8 have happened.

9 Q Have you ever met with Dr. Santamaria
10 and Fausto Alvarez to discuss the business?

11 A No, not for that purpose.

12 Q Have you ever discussed anything
13 concerning Cepsa with Dr. Santamaria and Fausto
14 Alvarez in the State of Florida?

15 A No, except that day that I told you.

16 Q With the exception of that one time?

17 A That's right.

18 Q Have you ever met with Guillermo
19 Castro in the State of Florida to discuss the
20 business of Cepsa?

21 A Yes. As I told you, I had to tell
22 him that Santamaria was going to fire him.

23 Q Other than that?

24 A We could have talked. He could have



1 come from Managua. "Pedro, I came from Managua.
2 Everything is going fine there," blah, blah, blah.
3 Yes, it could be.

4 Q When were you last in Managua?

5 A When I was last in Managua?

6 Q Yes.

7 A On the 9th of January.

8 Q Of January?

9 A Yes.

10 Q Have you been in Florida since then?

11 A Yes.

12 Q Did the freezer at the Miami
13 International Airport Terminal have a recording
14 device to check the temperature on the freezer?

15 A Yes, and an alarm system.

16 Q Would you describe the temperature
17 recording device?

18 A It's a round thing with a paper in
19 there. And it's changed every week by the em-
20 ployees of Lanica.

21 Q What do they do with that recording?

22 A They have to send it to Managua. It's
23 kept there.

24 Q The Bureau of Biologics requires that



1 this be done?

2 A Yes.

3 Q Is it part of their regulations in
4 connection with the import license?

5 A No. Our responsibility ends.

6 Q Sir, is it part of Managua's
7 regulations regarding the import license?

8 A No, definitely not.

9 Q Did the Bureau of Biologics ever
10 write to Cepsa and require that the freezer have
11 a temperature recording device on it?

12 A No. Never received such a letter.

13 Q How did the Bureau of Biologics
14 indicate that the freezer had to have a recording
15 device?

16 A They never requested. You're talking
17 about the freezer of Lanica.

18 Q I'm talking about the freezer at
19 the Miami International Airport.

20 A It's outside of the responsibility
21 of Cepsa.

22 Q I asked you if it was required by
23 the Bureau of Biologics.

24 A I'm telling you no. That's a



1 definite answer. No.

2 Q The freezer at Lanica--excuse me,
3 sir.

4 MR. VELEZ: Doctor, just answer his
5 question.

6 I think he's answered it already
7 three times.

8 THE WITNESS: He doesn't understand.

9 Q (By Mr. Melville) Now, you specifi-
10 cally answered yes, that this was required by the
11 Bureau of Biologics.

12 A Do you want me to answer now? I'm
13 allowed to answer?

14 The Bureau of Biologics requires that
15 the freezers at the premises of Cepsa in Managua
16 have to be kept at a certain temperature, etc., etc.
17 Okay. Now, the freezer at the Lanica Airlines is
18 not--

19 Q That's not my question. My question
20 was, does the Bureau of Biologics require that the
21 freezer at Lanica in the Miami International
22 Airport Terminal has a temperature recording device
23 on it?

24 A No.



1 Q They don't require that?

2 A If they require that--

3 Q Wait a minute, sir.

4 A Not to Cepsa.

5 MR. VELEZ: That's your answer.

6 Q (By Mr. Melville) Just answer the
7 question. Does the Bureau of Biologics require
8 that the freezer of Lanica at the Miami Inter-
9 national Terminal keep a temperature recording
10 device on it?

11 A I assume.

12 MR. VELEZ: Don't assume, don't
13 guess.

14 A It's not the responsibility of
15 Cepsa, whatsoever.

16 Q (By Mr. Melville) That's not my
17 question.

18 A I don't know. Ask the Bureau.

19 Q The answer is, simply, you don't know?

20 A I know that they want the tempera-
21 ture to be kept correctly. That's the interest of
22 the people that owns the plasma at that time, but
23 not Cepsa.

24 Q The question is very simple. Did the



1 Bureau of Biologics require--is your answer that
2 you don't know?

3 MR. VELEZ: He doesn't know. You're
4 beating a dead horse.

5 A I know that the Bureau wants the
6 temperature to be kept properly at all times.

7 MR. VELEZ: All right.

8 A (Continuing) That I know is a
9 regulation of the Bureau, but what I'm trying to
10 say--

11 Q (By Mr. Melville) I understand
12 what you're trying to say.

13 MR. VELEZ: You already said it.

14 Q (By Mr. Melville) Do you know that
15 the Bureau, as part of its regulations, requires
16 that the temperature be kept?

17 A Let me tell you the regulations of
18 the Bureau states this, that when you're shipping,
19 at the time that you come out of the premises off
20 of a center, the temperature has to be kept between
21 minus five and minus eighteen. Okay. Now, when
22 the plasma arrives here which does not belong to
23 Cepsa, at that time, it belongs to the broker or
24 whatever, the broker with Travenol or Cutter or



1 whatever, when it reaches here in Miami, Customs
2 has to inspect that. It's the responsibility of
3 Customs that it has arrived in between minus five
4 and minus eighteen. Then there is a facility at
5 Lanica Airlines in the case of Cepsa that puts that
6 freezer there at a certain temperature which exceeds
7 the regulation of the Bureau which calculates the
8 temperature. If the freezer was minus five, it
9 would be all right, you know, but it happens that
10 I know that the temperature exceeds that because
11 they have a tape recorder there. And the tempera-
12 ture was always at minus thirty or something
13 erroneous because the employees of Lanica will
14 send that. That is a favor we do for the broker
15 and the companies, but it's not the premises of
16 Cepsa. So the Bureau cannot hold Cepsa responsible
17 in any way for what happened to that freezer.

18 MR. MELVILLE: Mr. Corbin, will you
19 read that last question.

20 (Question read back by the Reporter.)

21 Q (By Mr. Melville) Is your answer
22 yes or no?

23 MR. VELEZ: I object to the question.
24 You're repetitious and argumentative with the



1 witness. He already answered, so I'm advising him
2 not to answer any further questions along this
3 line. We'll be here all day.

4 That calls for a legal conclusion
5 and it requires of this witness to conjecture with
6 respect to what the regulations of that Bureau are.
7 He is not competent. He is not a lawyer. So I'm
8 going to advise him he doesn't have to answer on
9 those grounds. It calls for a legal conclusion.
10 Furthermore, that's going beyond the scope of
11 discovery permitted.

12 MR. MELVILLE: You just objected
13 when there is no question.

14 Q (By Mr. Melville) Have you ever had
15 a key to that freezer?

16 A I don't.

17 Q Have you ever had a key to that
18 freezer?

19 A I don't remember having one.

20 Q Have you ever heard of Bio-Med-Hu?

21 A Yes.

22 Q What is it?

23 A It's a company that carries plasma.

24 Q Do they ever carry the plasma from



1 that freezer?

2 A I know that they have, yes.

3 Q Do they send it by truck?

4 A It's a trucking company.

5 Q Do they take it to the ultimate
6 purchasers from Cepsa?

7 A It's not my concern where they take
8 it.

9 Q The question is, do they take it to
10 the ultimate purchasers from Cepsa?

11 A From Cepsa, no.

12 Q The ultimate purchasers, sir?

13 MR. VELEZ: Now, you're requiring
14 this witness to speculate. You want him to give
15 a legal conclusion. I object to the form of the
16 question. Your question requires him to give a
17 legal conclusion as to who the ultimate purchasers
18 are. That is vague and ambiguous. I suggest you
19 rephrase the question.

20 Q (By Mr. Melville) Do they take it
21 to Abbott Laboratories?

22 A I don't know where they take it.

23 Q You don't have any idea at all?

24 A I imagine that they take it to the



1 fractionation plants.

2 Q Do you know the name of any frac-
3 tionation plants?

4 A As I have mentioned, there are many
5 fractionation plants in the United States.

6 Q Do you know the name of any frac-
7 tionation plants that this plasma is sent to, any
8 of the plasma that has been stored in the freezer
9 in Miami?

10 A If I understand your question, if
11 I know if the plasma has been stored in the freezer
12 at the International Airport which does belong to
13 Cepssa? I have to qualify that. Is it taken to
14 any fractionation plants in the United States or
15 outside of the United States? Yes, I have knowledge
16 of that.

17 Q How?

18 A Because I have been told.

19 Q By whom?

20 A By World Distributors.

21 Q Why did they tell you?

22 A They are the brokers.

23 Q Did they tell you that the plasma
24 that they had purchased from you and sold to the



1 different laboratories would be shipped by Bio-Med-
2 Hu in the Bio-Med-Hu trucks?

3 A Yes. They would notify us, and that
4 shipment on that date goes from Lanica. I ship it
5 to Miami and Bio-Med-Hu will take care of that now,
6 this shipment to Travenol. So it's got boxes
7 arranged in a certain manner. If it goes to
8 Cutter, it's got boxes arranged in a different
9 manner. So I know when it goes to Cutter and I
10 know when it goes to Travenol from Managua.

11 Q How often did you ship from Managua?

12 A That depends. It could be once a
13 month, it could be once every two weeks, it could
14 be once a week. It depends.

15 Q Can you make any estimate as to
16 the original size of the shipment in liters?

17 A In liters, three, four thousand
18 liters at a time. It could be up to five thousand
19 liters, one shipment. It could be down to two
20 thousand liters. As a matter of fact, who controls
21 that is the broker.

22 Q Has Bio-Med-Hu ever sent a receipt to
23 Cepsa for the plasma they picked up at the freezer
24 at Lanica Cargo Terminal?



1 A I haven't seen any.

2 Q Do you know if they ever sent such
3 a receipt to Cepsa?

4 A I don't know. I don't handle that
5 part at all, so I don't know. Maybe they sent a
6 copy. I don't know.

7 Q Have you ever seen a copy of such
8 receipt?

9 A No, I don't know. I have never seen
10 the receipt in my life by Bio-Med-Hu.

11 Q Have you ever heard of Fandino &
12 Sons, Inc.?

13 A I may have.

14 Q Do you recall?

15 A No.

16 Q Do you know if Fandino & Sons, Inc.
17 ever sold equipment to Cepsa?

18 A Not to my knowledge.

19 Q Have you ever heard of Continental
20 Medical Supply, Inc.?

21 A That whole name, no.

22 Q Never heard of that name with that
23 whole name?

24 A I don't remember right now.



1 Q You don't recall ever having heard
2 of such a company?

3 A I don't recall at this time.

4 Q Have you ever heard of Vega (phonetic)
5 Equipment Company?

6 A I don't recall at this time.

7 Q Have you ever heard of a man by the
8 name of Enrique Torrens?

9 A Yes.

10 Q Does he work for Fausto Alvarez?

11 A I think he does.

12 Q Does he ever work for Cepsa?

13 A I can't tell you. I don't know.

14 Q Have you ever heard of the address--

15 A Let me see.

16 Q I'm sorry.

17 A I think by the time the papers of
18 the Bureau of Biologicals were filed in Managua,
19 he was in Managua working to do the job for Castro.
20 I think he did.

21 Q Does the address 3644 Northwest 12th
22 Terrace, Miami, Florida, ring any bell in your mind?
23 Do you recall that address?

24 A Not at all.



1 Q Have you ever heard of Daco Enter-
2 prises Corporation?

3 A Yes, the name is familiar.

4 Q In what connection?

5 A The name is familiar.

6 Q Do you know if Daco Enterprises ever
7 sold goods to Cepsa?

8 A I don't know for a fact whether they
9 did or not.

10 Q Have you ever personally bought
11 supplies for Cepsa?

12 A In the State of Florida?

13 Q At any time, at any place?

14 A No.

15 Q Never?

16 A No, never. Personally, never did.

17 Q Now, on the checks written on the
18 United States bank accounts, did those checks
19 require dual signatures?

20 A Yes.

21 Q Was one of the required signatures
22 that of Dr. Santamaria?

23 A Yes.

24 Q Was the other required signature



1 either yours or Fausto Alvarez'?

2 A Yes, or Mr. Castro, I believe.

3 Q That would have been at the time he
4 was responsible?

5 A Yes. He did have his signature at
6 the bank. I'm not sure, though.

7 Q Did you ever carry any checks of
8 Cepssa up to Miami to give to Fausto Alvarez?

9 A I don't recall having done that.

10 Q To the best of your recollection,
11 were the suppliers in Florida to Cepssa paid with
12 checks drawn on the Miami bank accounts?

13 A I have no knowledge whatsoever if
14 they were the suppliers here, how they were paid.
15 It wasn't my duty.

16 Q Do you know if Fausto Alvarez ever
17 deposited in a Miami bank account a dividend check
18 of Cepssa?

19 A I don't know. You have to ask him.

20 Q You just don't know, is that your
21 testimony?

22 A I don't know.

23 Q To the best of your knowledge, when
24 was the last time any of Cepssa's products were tested



1 in the United States?

2 A Maybe January or February of '76.

3 Q After that time, all the testing was
4 done in Managua?

5 A That's correct.

6 Q Was it because you purchased your
7 own test equipment?

8 A Yes, sir. The company.

9 Q When I say you, I mean the company.
10 To your knowledge, sir, did Abbott
11 Laboratories ever send an agent or employee to check
12 the temperature on the freezer at the Lanica
13 Terminal?

14 A I don't know if they ever did or not.

15 Q Do you know if Cutter Laboratories
16 ever did?

17 A I don't know.

18 Q Do you know if Travenol ever did?

19 A Yes, it was their concern to do it.
20 They should have.

21 Q Do you know if they did?

22 A I don't know for a fact they did.
23 If I were in their position, I would send somebody
24 to check it.



1 Q Do you know?

2 A I don't know for a fact.

3 Q Do you know if Hubber ever did?

4 A I don't know for a fact.

5 Q Do you know if World Distributors
6 ever did?

7 A I think they did. I know of one
8 occasion that they sent a man over to check the
9 temperature of the freezer, yes.

10 Q What was his name?

11 A I can't recall. Honest to God, I
12 can't. Something that started with an R.

13 Q Lots of names start with an R.

14 A A hell of a lot of them.

15 Q Do you recall when that was?

16 A Maybe six months ago, something like
17 that.

18 Q Is Lanica paid for sending tempera-
19 ture recordings from the freezer to Cepsa?

20 A I don't know. I don't handle any-
21 thing that is paying or buying, money exchange.

22 Q Do you know if Abbott or Cutter or
23 Hubber or any other firm pays Lanica for the use
24 of the freezer?



1 A I don't know.

2 Q Do you know if World Distributors,
3 Inc. paid Lanica for the use of the freezer?

4 A I don't know.

5 Q Do you know if anybody pays anybody
6 for the use of the freezer?

7 MR. VELEZ: I object to the form.
8 That's a silly question.

9 A It's not my concern. Do you want me
10 to speculate?

11 MR. VELEZ: Doctor, don't answer that.
12 There is no question pending. I object to that.

13 MR. MELVILLE: I will withdraw the
14 question.

15 Q (By Mr. Melville) Do you know if
16 Lanica is paid by anyone for use of the freezer?

17 A I really don't know. I don't think
18 they are, but I don't know.

19 MR. MELVILLE: I don't have any
20 further questions at this time.

21 We reserve the right to take any of
22 the certified questions to the Judge, if he requires,
23 and then we will come back for answers to those
24 questions and any other discoverable evidence that



1 arises therefrom.

2 MR. VELEZ: Are you going to give me
3 a notice of hearing?

4 MR. MELVILLE: On what?

5 MR. VELEZ: On your motion for your
6 continuance.

7 MR. MELVILLE: On the record, I'm
8 advising you again as I advised yesterday--

9 MR. VELEZ: Give it to me in writing.

10 MR. MELVILLE: Your hearing on
11 Thursday will be on Tuesday's motion calendar at
12 1:30.

13 If you wait five minutes, I'll give
14 it to you in writing.

15 MR. VELEZ: Do you want to agree on
16 taking his son's deposition?

17 MR. MELVILLE: I have to think about
18 that.

19 MR. VELEZ: Do you want to give me
20 his address voluntarily up in Pennsylvania or
21 wherever he is?

22 MR. MELVILLE: University of
23 Pennsylvania Law School.

24 MR. VELEZ: He doesn't have a residence



1 address?

2 MR. MELVILLE: I don't know. I'm
3 sure he has a residence address up there.

4 MR. VELEZ: I don't want to serve him
5 on campus.

6 MR. MELVILLE: You're saying you want
7 to take his deposition?

8 MR. VELEZ: Yes. I already told
9 Vinnie Flynn that a long time ago.

10 MR. MELVILLE: We'll bring him down
11 for you sometime.

12 MR. VELEZ: Not sometime, right away.
13 I want to depose him within the next two weeks.

14 MR. MELVILLE: I'll have to talk to
15 Mr. Castro.

16 MR. VELEZ: He is here now. Do you
17 want to ask him?

18 MR. MELVILLE: Not right now.

19 MR. VELEZ: Do you want to get back
20 to me Monday, or else, I'll file a motion.

21 MR. MELVILLE: I'll give you a call
22 by Monday.

23 MR. VELEZ: Do you want to accept the
24 subpoena that I have on his behalf or do you want me



1 to serve it on him?

2 MR. MELVILLE: I'll accept it for him.

3 MR. VELEZ: All right.

4 MR. MELVILLE: Do you have it with
5 you?

6 MR. VELEZ: No. I'll get it to you.

7 One last question. Were any dividends
8 paid here in Miami, Florida?

9 THE WITNESS: Not as far as I know.

10 MR. VELEZ: That's all we have. Do
11 you have any questions?

12 Q (By Mr. Melville) I have a few more
13 questions for you.

14 A I thought you were finished.

15 Q No, I'm not.

16 You just said no dividends were paid
17 here in Miami, Florida?

18 A Not to me. I don't know about any-
19 body else.

20 Q As far as you know, you can only
21 testify for yourself?

22 A Absolutely.

23 Q Only you received no dividends here?

24 A No. How can I say a thing like that.



1 Do you think I'm an idiot?

2 Q The question was, were any dividends
3 paid here?

4 A Not to me. I testified for myself,
5 period.

6 MR. MELVILLE: Okay. If you wait two
7 minutes, I'll give you a notice of hearing.

8 THE REPORTER: Do you waive?

9 MR. VELEZ: No.

10 (Thereupon, at 1:15 o'clock p.m.,
11 taking of the deposition was con-
12 cluded.)

13
14
15 Sworn to and subscribed before me this

16 _____ day of _____, 1978.
17
18
19
20
21
22
23
24



CERTIFICATE OF NOTARY

STATE OF FLORIDA:

: SS

COUNTY OF DADE :

I, NATHANIEL CORBIN, a Certified Shorthand Reporter and Notary Public in and for the State of Florida at Large, do hereby certify that I reported the deposition of PEDRO M. RAMOS, a witness called by the Plaintiff in the above-styled cause; that said witness was duly sworn by me; and that the foregoing pages, 1 to 117, inclusive, constitute a true record of the deposition by said witness.

I further certify that I am not an attorney or counsel of any of the parties; nor a relative or employee of any counsel or attorney connected with the action; nor financially interested in the action.

WITNESS my hand and official seal in the City of Miami, County of Dade, State of Florida, this 7th day of February, 1978.

Nathaniel Corbin

NOTARY PUBLIC STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES FEB. 5, 1979
BONDED THRU GENERAL INSURANCE UNDERWRITERS

