

1 .like if the company has hours. I gave my boss number
2 and she called him.

3 740. Q. And what's her last name? I don't know if we
4 got it earlier or not.

5 A. I don't know her last name.

6 741. Q. And were you involved in the hiring of Suzan
7 Amini? Sorry, we've already covered this name. We
8 covered that.

9 MS. VAN WEERT: Yeah, that was the one. . .that
10 was. . .she's not as good as her daughter.

11 BY MR. BURY:

12 742. Q. Right. And Homa Javadzadeh?

13 MS. VAN WEERT: That's her daughter.

14 BY MR. BURY:

15 743. Q. Got it. Right?

16 A. Yes, I just wrote the name.

17 744. Q. And Seyed Reza Ziaei?

18 A. Seyed Reza Ziaei was my ex-boyfriend years
19 ago, and both of us working for the Michel Germain. Why.

20 . .like I introduce him to the Michel Germain?

21 745. Q. No, that's my question. Did you also help
22 him get his position?

23 A. Probably, yes, because first I was working
24 with Michel Germain so I. . .like probably.

25 746. Q. Okay, and do you remember when that was?

1 that? Okay, so starting with the first paragraph, 'I
2 have never assaulted my wife. None of those allegations
3 have any truth at all.' So you. . .fine, you said that.
4 You're not changing that story today?

5 A. No.

6 1011. Q. Okay. You've never hit her?

7 A. No.

8 1012. Q. Never strangled her?

9 A. No.

10 1013. Q. Okay. 'My wife has a history of using the
11 police to give her a leverage of sorts with her male
12 relationships.' So what evidence do you have of that?

13 A. Well in 2012 I spoke to her first husband at
14 the mattress shop at Finch and Dufferin and when I told
15 him my story and what had happened to me, he simply said
16 that a similar thing had happened to him and which
17 subsequently led to divorce. That's what I knew from her
18 first husband.

19 1014. Q. I want to know exactly what he. . .first of
20 all, why were you looking for her first husband?

21 A. I was looking for him to. . .because I had
22 doubts at that moment about what had happened to me and I
23 just wanted to do some research about--

24 1015. Q. You had doubts at what moment?

25 A. I had doubts about what character I was

1 dealing with at that time so I went--

2 1016. Q. What time was it that you were looking for
3 her first husband?

4 A. That was in the 2012 incident.

5 1017. Q. So after you got charged?

6 A. After I got charged, yes.

7 1018. Q. You went and sought out her first husband?

8 A. Yes.

9 1019. Q. Okay, and you found. . .how did you find him?

10 A. Based on what she had told me previously on
11 an unrelated matter that he owned a mattress shop in a
12 plaza, so that's how I just went and I asked for his name
13 and he turned out to be the same guy. That's how I met
14 him.

15 1020. Q. And had you met him prior to that?

16 A. No.

17 1021. Q. What did you know about him before you went
18 to meet him?

19 A. Nothing from. . .basically what I knew from
20 my ex-wife about him.

21 1022. Q. And what had she told you about him?

22 A. She. . .I knew very little about what. . .the
23 details of what had happened between them but I knew they
24 got divorced. I know she wasn't happy with her first
25 husband and I knew she was. . .you know, some of the

1 stories I heard that she was working and he would take
2 her money or she was distributing a newspaper on foot
3 while he was driving, things like that, but I never asked
4 him. What I knew is basically what she voluntarily told
5 me. I never pressed her for any details about her past
6 prior to that.

7 1023. Q. Okay, so she wasn't happy. You know she. .
8 .that they were divorced?

9 A. Yes.

10 1024. Q. And you know that she wasn't unhappy about
11 the divorce?

12 A. She was not unhappy?

13 1025. Q. She was glad to be divorced from him.

14 A. Obviously, yes.

15 1026. Q. Well, was it. . .you said he was the one who
16 wanted a divorce based on what she had done, I thought.

17 A. I said that he wanted a divorce?

18 1027. Q. Well you said that she concocted a story
19 similar to the one that she allegedly concocted with you
20 and that led to divorce.

21 A. Yes, but I don't know who requested a
22 divorce, who really wanted it. That detail is not known
23 to me.

24 1028. Q. Okay. Do you know whether this man is even
25 credible?

1 A. I met him for first time. I can't really
2 pass any judgment.

3 1029. Q. But you're relying on his--

4 A. I'm just relying on what I heard from him.

5 1030. Q. And you want the court to accept it as true?

6 A. That's up to the court to decide.

7 1031. Q. It's completely hearsay, you'll agree?

8 A. Pardon?

9 1032. Q. It's. . .you're using hearsay from a man you
10 met once.

11 A. Yes.

12 1033. Q. But you're using that to defame Sheida's
13 character.

14 A. I'm not trying to defame anybody, it's just
15 I'm disclosing what I heard.

16 1034. Q. Okay.

17 A. Based on what I heard personally.

18 1035. Q. And what did he tell you happened between
19 them? I want as much exact information as you recall,
20 given that you're asking the court to view her negatively
21 based on a conversation that took place six years ago
22 with a stranger.

23 A. He did not really get into too much details.
24 I know for a fact that this guy's sister is married to
25 your client's brother back home, so during the whole

1 conversation he remained pretty much very tight lipped.
2 He did disclose some stories based on what I had told him
3 had happened to me.

4 1036. Q. What stories?

5 A. Basically the fact that she was taken to
6 hospital, that she had fainted and I was subsequently
7 taken to arrest, to custody, and basically he said a
8 similar incident is what he had experienced where
9 ambulance was called in and this came but he was
10 obviously not charged.

11 1037. Q. Why is it obvious that he wasn't charged?

12 A. He said that he had witnesses standing by.
13 Basically they came and took the report and nothing
14 happened so this was what I had heard from him.

15 1038. Q. Did he say to you that she tried to have him
16 charged or just that she was hospitalized and the police
17 were interested in why she was hospitalized?

18 A. He did not explicitly say that she did try to
19 have him charged but he spoke about police presence and
20 EMS presence so this is what--

21 1039. Q. Well if somebody passes out, EMS comes.
22 Correct?

23 A. Yes.

24 1040. Q. That doesn't suggest that anybody is trying
25 to lay charges.

1 A. Well from what I understood from him she was
2 responsive so it's not that she was not responsive but--

3 1041. Q. So he did not at all say to you that she
4 tried to have him charged?

5 A. Not explicitly, no.

6 1042. Q. Did he say it implicitly?

7 A. Well he didn't refer to it at all.

8 1043. Q. So by saying that she did the same thing with
9 him, she didn't try to have him charged, did she?

10 A. I don't know that for a fact.

11 1044. Q. You certainly don't know it from him, do you?

12 A. I spoke to him, yes.

13 1045. Q. Right, but you don't know from him that she
14 tried to have him charged because he didn't say that.

15 A. He did not it in that language.

16 1046. Q. So I guess that's a big difference between
17 his situation and your situation, isn't it?

18 A. I don't know that.

19 1047. Q. So it's really not a big difference that she
20 didn't try. . .he didn't say that she tried to have him
21 charged but she did have you charged, twice in fact.

22 A. Well no, there are similarities because the
23 first incident, according to the report, she did not have
24 me charged directly. There was a friend, a mutual friend
25 was at our home who attested to that and I was basically

1 taken to custody based on what--

2 1048. Q. And did that happen to him? All his friends
3 helped him you said. He had witnesses.

4 A. I don't know exactly what happened. I don't
5 have the details of what happened. He did not disclose
6 it.

7 1049. Q. So that's very helpful. What about the
8 boyfriend? Do you have more information from him?

9 A. Yes, I spoke to him this past July on two
10 occasions. I spoke to him and I asked him basically what
11 had happened to him and he told me that he was taken to
12 custody. He said there were some charges and he still
13 has a criminal record. He carries the criminal record
14 from that point.

15 1050. Q. So he was convicted?

16 A. Yes.

17 1051. Q. Oh, maybe that will be a similarity too.

18 A. He also told me about another person that I
19 was not aware of who was also charged. I'm not sure
20 about his full name or his whereabouts but he claimed
21 that your client was common-law partner with him in early
22 2000, before he got to know her, and he was also charged.

23 1052. Q. And you don't even have a name for this one?

24 A. I do. He just gave me a first name. I don't
25 really know anything else about this person.

1 1053. Q. And you've never spoken to that person?

2 A. I have never spoken to that person.

3 1054. Q. So what charge was Mr. Ziaei convicted of?

4 A. From what he told me his charges were, I
5 guess, **assault, threat, forcible confinement.** I guess
6 the forcible confinement was dropped in exchange for him
7 **pleading guilty to lesser charges,** and I guess there were
8 two different occasions of those encounters from what I
9 understood from him, **in 2002 and 2004.**

10 1055. Q. Do you have contact information for him?

11 A. I just have his phone number.

12 1056. **U/T** Q. Can I have it, please? That's an
13 undertaking?

14 A. Yes.

15 1057. Q. Thank you.

16 MR. BURY: Sorry, can we clarify the name of the
17 person we just referred to?

18 1058. MS. VAN WEERT: It's the person referred to in
19 paragraph 4.

20 MR. BURY: Okay.

21 BY MS. VAN WEERT:

22 1059. Q. So in paragraph 7 you say, 'My wife is a
23 terrific salesperson. She is also a terrific actor and
24 is confident of her **ability to mislead people.**' What are
25 you referring to by misleading people?

1 A. Well she's very convincing. That's what I'm
2 referring to. She can be very convincing.

3 1060. Q. Yeah, but when does she mislead people?

4 A. When she sells perfume that is a no-name
5 brand and makes it to a Number 1 brand. The brand that
6 she deals with is not a world famous brand but she can
7 sell that brand the same quantity as all the other well-
8 known brands, so--

9 1061. Q. That's where she misleads people?

10 A. Yes.

11 1062. Q. Any other evidence of her misleading people?

12 A. In terms of?

13 1063. Q. Well you're the one who said it.

14 A. Well, yes. The fact that I was charged this
15 time based on things that I didn't do. I think that
16 requires some convincing power to--

17 1064. Q. Any other examples of her misleading people?

18 A. I can think of many things but not off the
19 top of my head.

20 1065. **U/T** Q. Okay, so give me an undertaking if you have
21 other examples of when you claim your wife has misled
22 people that you will advise us?

23 A. Yes.

24 1066. Q. Thank you. When did your marriage become
25 unhappy?