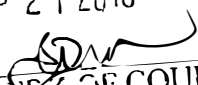


IN THE HIGH COURT
 REPUBLIC OF THE MARSHALL ISLANDS
 MAJURO ATOLL


FILED
 SEP 21 2018

 ASST. CLERK OF COURTS
 REPUBLIC OF THE MARSHALL ISLANDS

EIGIGU HOLDINGS CORPORATION)	Civil Action no. 2014 – 067
)	
Plaintiff)	
)	
-V-)	AFFIDAVIT OF ASNET EDISON
)	
LEANDER LEANDER and LIJUN LEANDER,)	
)	
Defendants)	
)	

I, Asnet Edison, of Delap, Majuro, Marshall Islands, depose and state as follows:


1. I am 39 years of age;
2. I used to work part-time for attorney Gordon Benjamin’s adoption agency, I took the birth mothers who wishes to give their children for adoption, and do shopping and other things for them during the adoption process;
3. I remembered bringing Emlin Amlet to Gorodon’s Office and conduct interview and was video;
4. I confirm listening to what she said about the prostitution issues but could not remember everything that she said during that time;
5. I confirm that the video interview was true and correct to best of my knowledge.

Dated: September 21, 2018




 Asnet Edison

Sworn and subscribed before me this _____ day of September, 2018



 Public Notary


 Nang Jack
 NOTARY PUBLIC
 Republic of the Marshall Islands
 My commissions expires on the
 12 day of FEB 20 20

TRANSCRIPTION OF VIDEO INTERVIEW WITH HEMLEN AMLEJ

Name: Hemlin Amlej

Age: 20

Residence: Uliga

Occupation: None (Former Sex Worker)

Gordon Benjamin: Well first of all how old are you?

Hemlen Amlej: 20

Gordon Benjamin: 20? So you're born in 2000, I mean 1994?

Hemlen Amlej: Yup

Gordon Benjamin: What date were you born?

Hemlen Amlej: May, 3

Gordon Benjamin: May 3, oh

Gordon Benjamin: What's your name?

Hemlen Amlej: Hemlen

Gordon Benjamin: Emlen?

Hemlen Amlej: H-e-m-l-e-n

Gordon Benjamin: oh H, Hemlen. And your last name?

Hemlen Amlej: Amlej

Gordon Benjamin: How do you say it?

Hemlen amlej: Amlej

Gordon Benjamin: Ok how do you spell it?

Hemlen Amlej: A, M, L, E, J

Gordon Benjamin: Alright. So Hemlen can you tell me a little bit about, um I don't was it back there at SDA area? Or Eastern gateway or anything?

Another person: Tom shu... (Marshallese)

Gordon Benjamin: Alright what do you know about Tom? That, well I'll tell you what I know about Tom. I've heard he got some rooms in the back. And that in the rooms when there are sea men, somebody somehow calls the girls to come and be with the seamen.

Hemlen Amlej: yeah! He freed one room for the girls, so they can stay there and wait for the fishermen

Gordon Benjamin: wait for who?

Hemlen Amlej: the fishermen to come

Gordon Benjamin: ok and then

Hemlen Amlej: they buy them drinks, get them drunk

Gordon Benjamin: who buys the drinks? The seamen?

Hemlen Amlej: yeah

Gordon Benjamin: alright. Now does he makes the calls to the girls? Like you

Hemlen Amlej: no he told the girls to come and sleep at the apartment and he give them one apartment room. Free

Gordon Benjamin: you mean they live there?

Hemlen Amlej: yeah

Gordon Benjamin: oh, how many girls?

Hemlen Amlej: I think 5 girls

Gordon Benjamin: and they just live there all the time? Oh I see. So they're always there

Hemlen Amlej: yeah, it's their house now

Gordon Benjamin: okay are you one of the 5? Or?

Hemlen Amlej: yeah I was one of the 5

Gordon Benjamin: oh you were one of the 5

Hemlen Amlej: but I...

Gordon Benjamin: you were one of the five and you left it. Ok, so the girls are there and then he'll just say, get ready there's some seamen are coming. Is that mean somebody calls him and say hey there's some people coming?

Hemlen Amlej: no. they always come because the boss already told them that we have girls

Gordon Benjamin: who told them? What boys told them?

Hemlen Amlej: the boss

Gordon Benjamin: oh the boss, what boss?

Hemlen Amlej: Tom Shu

Gordon Benjamin: will tell who?

Hemlen Amlej: call them fishermen when they call him

Gordon Benjamin: oh when they call him, so somehow they know to call Tom Shu right?
Alright. So they call him and then he tells the girls, oh there's some guys

Hemlen Amlej: get ready because all the fishermen will come

Gordon Benjamin: what does it mean to get ready?

Hemlen Amlej: you need to take shower and dress up

Gordon Benjamin: oh I see. And then

Hemlen Amlej: after they finish they went home and they girls sleep together

Gordon Benjamin: alright so, but, say there's 5 girls right? How many are there that, like the seamen come. Is there five different rooms they can go to or four different rooms, three different rooms because there's one room that the girls are staying right? Now is there any other rooms?

Hemlen Amlej: yeah, they have a lot of rooms

Gordon Benjamin: oh a lot of rooms, ok how many rooms?

Hemlen Amlej: I think 6

Gordon Benjamin: okay, so if 6 guys come there go 5 whatever

Hemlen Amlej: sometime they have short time, if the guy want to sleep they sleep. If they want to like short time, they want to stay with the girl only like one hour and then finish they go and they another guy comes want to sleep with her

Gordon Benjamin: oh I see

Another person: she mean rent the girl like hours

Gordon Benjamin: yeah went by the hour. And do you know what the seamen pay to tom for the room and the girls? How much they pay to tom?

Hemlen Amlej: they give like short time twenty dollar

Gordon Benjamin: to Tom?

Hemlen Amlej: yeah and then ten dollar for the girl

Gordon Benjamin: just \$10? Ok. How much do the girls get?

Hemlen Amlej: they also get ten dollar or twenty dollar

Gordon Benjamin: ten dollar or twenty dollar, so if the girl is with the guy for one hour she gets ten dollar, but the guys are only paying Tom Shu ten dollars or you don't know or what?

Hemlen Amlej: some time when, they always pay him like when they sleep like twenty five dollar and twenty dollar. If they short time they give him twenty dollar and ten

Gordon Benjamin: so thirty dollar. He doesn't charge a lot of money like one hundred dollars or? And they are speaking in Chinese?

Hemlen Amlej: yeah they speak in Chinese

Gordon Benjamin: not in English at all, the Chinese guy, the fishermen don't know English right?

Have you heard anything happening there were the girls are hurt or?

Hemlen Amlej: no, but all the girls always fight together

Gordon Benjamin: always what?

Hemlen Amlej: fight together

Gordon Benjamin: oh, with other girls?

Hemlen Amlej: with the other girls when they are drunk

Gordon Benjamin: I see, what are they fighting over?

Hemlen Amlej: always for like men problem, fishermen

Gordon Benjamin: and those guys are they clean? Or they smelly? Or?

Hemlen Amlej: I don't know some time they don't like use condom but we like to use condom and then they speak to tom and tom talk back to them we need to do it what they say

Gordon Benjamin: wow just do what they say and um, so sometimes they don't use condom

Hemlen Amlej: yeah

Gordon Benjamin: and even though girls

Hemlen Amlej: if we don't like using condom we don't like use condom but they don't like they go talk to the boss and then told him that we like to use condom but they don't like and then the boss come to the room and then shout to us and then scream

Gordon Benjamin: who screams? The boys, fishermen? Or Tom?

Hemlen Amlej: Tom

Gordon Benjamin: Tom is screaming to you girls

Hemlen Amlej: yeah, told us we don't have to talk back to them like that, we have to listen to because they give us money.

It's not his store, he just rent it

Gordon Benjamin: the store?

Hemlen Amlej: NI HAO STORE

Gordon Benjamin: NI HAO STORE, yeah, that's not his store? I thought that was his store.

Whose store is that?

Hemlen Amlej: the owner?

Gordon Benjamin: yeah

Hemlen Amlej: Leander

Gordon Benjamin: Leander?

Hemlen Amlej: rent from Leander

Another person: (speaks Marshallese)

Gordon Benjamin: store is owned by Leander

Hemlen Amlej: Leander Leander

Gordon Benjamin: Leander Leander

Another person: He rent from Leander

Hemlen Amlej: (Sic)

Gordon Benjamin: and tom rents the store from Leander and tom is the one selling stuff from the store but the owner is Leander? It's like_Magi Store or something like that

Hemlen Amlej: yes

Gordon Benjamin: does Leander do anything on that store?

Hemlen Amlej: no, he just go and take the money because the store belong to them but he's not the one who build the store

Gordon Benjamin: ok its Leander's store. You're twenty years old, when did you leave uh the place? You said you don't go there anymore. Ok, when did you leave?

Hemlen Amlej: when I was pregnant

Gordon Benjamin: you already have the baby?

Hemlen Amlej: yeah

Gordon Benjamin: where's the baby now?

Hemlen Amlej: with my mom

Gordon Benjamin: oh with your mother. How old is the baby?

Hemlen Amlej: six month

Gordon Benjamin: um, was that from one of the Chinese guys the, fosters father, the fishermen or is it a Marshallese guy?

Hemlen Amlej: philipino

Gordon Benjamin: oh philipino guy, sorry phillipino seamen?

Hemlen Amlej: yeah

Gordon Benjamin: oh ok, so it was one of the customers, tom's customers and that's coz he wasn't wearing condom? So when you got pregnant u left the place right?

The father, know anything about the father?

Hemlen Amlej: I always see him but i never talked to him

Gordon Benjamin: ok what do you mean you always see him? Is he leaving here?

Hemlen Amlej: he always came here like months

Gordon Benjamin: oh I see, goes out and comes and goes and

Hemlen Amlej: yeah

Gordon Benjamin: now those guys do they ask you to do things that kind of weird or just normal stuff?

Hemlen Amlej: weird stuff

Gordon Benjamin: weird stuff?

Hemlen Amlej: they always make the girl drunk and when they bring other girl. They don't do one, like three boy one girl

Gordon Benjamin: oh wow!

Hemlen Amlej: and then we always told Tom of what they have done last night and told us like we didn't control ourself.

Gordon Benjamin: what does he say?

Hemlen Amlej: how come you didn't control yourself to not make the guy really drunk

Gordon Benjamin: he blames you?

Hemlen Amlej: yeah, blame us

Gordon Benjamin: do the girls have any problems with mom or dad or I mean they don't want to live at home that's why they're staying at that room or

Hemlen Amlej: they always like to go home but Tom don't let them go

Gordon Benjamin: Tom doesn't let them go?

Hemlen Amlej: sometime when they not feel well they like don't like to go with other customer, he come and yell at them to go with the other guy. When we stay inside the room only but when the fishermen come tom only stay inside the room he come and yell at us to go outside because the customer gonna come

Gordon Benjamin: so when you started, how old were you when you started?

Hemlen Amlej: I was like seventeen

Gordon Benjamin: so you did this all the way until the baby was born? I mean till you got pregnant. And the baby is six months old now, so maybe a year ago or so you stopped

And then the two years you would get like ten dollars or whatever. Let's say in one day how much money would you make in one day.

Hemlen Amlej: one day?

Gordon Benjamin: yeah. Like say, he says oh fishermen are coming and then you go have shower and ta da da da dah

Hemlen Amlej: we got only ten dollars

Gordon Benjamin: for that whole time? What if you had more than one person? Like one guy for one hour then a next guy for another hour and then another guy for four hours like that, say you have three different people three different time. You only get ten dollars for the whole time? Or ten dollars per guy?

Another person: (translating)
If three guys ten dollar for one guy

Gordon Benjamin: one guy would be ten dollars right? You said one time that he also gave twenty dollar, is that right?

Hemlen Amlej: when we sleep

Gordon Benjamin: when you sleep what do you mean?

Hemlen Amlej: if the guy like to sleep with us,like for one night

Gordon Benjamin: or just stay overnight

Hemlen Amlej: twenty dollars

Gordon Benjamin: there was a girls that the, I mean Kimberly with that been met at island disco. So Kimberly would she go there and to Tom su's place

Hemlen Amlej: they were before stay at tom su's house before but all the girls move to gateway they don't like tom when he pay them is not good and then he always force them to go with the guy

Gordon Benjamin: they don't like, so then they moved over to

Another person: (speaking in Marshallese)

Gordon Benjamin: what about a girl. What's that? Sorry what

Hemlen Amlej: Selina only fifteen years old

Gordon Benjamin: Selina, where is Selina

Hemlen Amlej: staying at island disco

Gordon Benjamin: and she's only fifteen?

Hemlen Amlej: yeah! Sometime when the fishermen go there they will call the girls to go

Gordon Benjamin: who did they call?

Hemlen Amlej: the worker

Gordon Benjamin: the worker calls to who?

Hemlen Amlej: call all the girls, you know all the girls at tom su's house

Gordon Benjamin: whose phone do they call? Well that's what I'm gonna ask? You mention that Cathy just now

Another person: she's the

Gordon Benjamin: can you tell me who Cathy is? Who's Cathy? Is she rimajol

Hemlen Amlej: Marshallese

Gordon Benjamin: she's Marshallese! But she looks different right?

Hemlen Amlej: yeah, her husband is a Chinese

Gordon Benjamin: how often do the sea men come? Do you know like, the girls that live there, they would get ten dollars per night or twenty dollars if they sleep over right? When they sleep over means the guys just sleeping beside the girl? Or in a different room right the boy and the girl together. Say in one week how many times would the fishermen come?

Hemlen Amlej: anytime

Gordon Benjamin: what?! When you were there do you live in the room? In one week would be more than three times or four nights maybe or five or six or

Hemlen Amlej: maybe three

Gordon Benjamin: three... and then say the next week. Those are the four now?

Hemlen Amlej: yeah

Gordon Benjamin: oh yeah ok. What about over at eastern gateway do you know anybody there now?

Hemlen Amlej: island disco, Jolenty, Rebecca, Kimberly, Kilmath, Selina,

Gordon Benjamin: there's no Selmina there too?

Hemlen Amlej: Selmina... I forgot the other two. Two girl I forgot their name

Gordon Benjamin: oh ok let me see... Selina, Selmina, Mimi and Kimberly that's who my friends said alright um. What is behind the Z brothers? You said you walked in the back there, what's back there?

Hemlen Amlej: nothing just go up

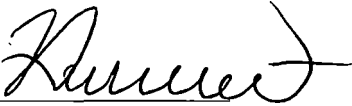
Gordon Benjamin: just a passage way and they have stairs going to the second floor. And this lady Cathy was she working with somebody else?

Hemlen Amlej: they just own the bar and the girls.

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on the counsel for Defendants through his email, James McCaffrey. James@mccaffreyfirm.com, this date or soon thereafter file stamp of the document.

Dated: September 21, 2018



Divine F. Waiti