

Exhibit D

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PASHA S. ANWAR, et al.,
Plaintiffs,

Civil Action No.

vs.

09-CV-0118 (VM)

FAIRFIELD GREENWICH LIMITED, et al.,
Defendants.

-----x

VIDEOTAPED DEPOSITION OF RICHARD MICHAEL ROUTHIER

New York, New York

August 24, 2011

Reported by:

KATHY S. KLEPFER, RMR, RPR, CRR, CLR

JOB NO. 41336

1 **R. Routhier**
 2 **the Fairfield Funds?**
 3 A. No.
 4 **Q. Did you ever receive a copy of an**
 5 **audit report for the Fairfield investments?**
 6 A. I can't recall.
 7 **Q. Just give me one second, please.**
 8 A. Uh-huh.
 9 **Q. You have stated a couple times today**
 10 **that the decision to invest in the Fairfield**
 11 **Funds was ultimately made by Mr. Pollock; is**
 12 **that correct?**
 13 A. Yes.
 14 **Q. Would it be correct to say that --**
 15 **that your role in those decisions was to approve**
 16 **them?**
 17 A. Yes.
 18 **Q. But by approving -- well, I guess**
 19 **I just -- earlier you had said your role was**
 20 **that of support?**
 21 A. Yes.
 22 **Q. So, in terms of approving them, do you**
 23 **mean that you supported the decision that was**
 24 **made by someone else?**
 25 A. I did, and part of that role is to try
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1 R. Routhier
 2 to understand the logic and make sure that we --
 3 we were -- if we did have disagreements, that we
 4 were able to hash them out, yes.
 5 MS. PIERCE: I think those are all the
 6 questions that I have.
 7 THE WITNESS: Okay. All right.
 8 MS. PIERCE: Thanks.
 9 EXAMINATION BY
 10 MS. CRAWFORD:
 11 **Q. Good afternoon. My name is Amy**
 12 **Crawford and I'm from the law firm of Kirkland &**
 13 **Ellis. We represent PricewaterhouseCoopers**
 14 **(Canada), okay?**
 15 A. Uh-huh.
 16 **Q. And I may refer to**
 17 **PricewaterhouseCoopers (Canada) as "PwC**
 18 **(Canada)," okay?**
 19 A. Very good.
 20 **Q. Now, you mentioned that you don't**
 21 **recall seeing -- considering who the auditor of**
 22 **Fairfield Sigma was prior to St. Stephen's**
 23 **investment in Sigma, right?**
 24 A. Correct.
 25 **Q. And you didn't know who the auditor of**
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1 **R. Routhier**
 2 **the fund was after the investment was made**
 3 **either, did you?**
 4 A. No.
 5 **Q. Did anyone ever tell you that Sigma**
 6 **had changed audits since St. Stephen's initially**
 7 **invested?**
 8 A. No.
 9 **Q. Now, you recall earlier you were asked**
 10 **what materials you relied on in maintaining St.**
 11 **Stephen's investment?**
 12 A. Yes.
 13 **Q. You didn't rely on any audit reports**
 14 **or audits of year-end financials, right?**
 15 A. Correct.
 16 **Q. Until this lawsuit was filed, did you**
 17 **have any idea that PricewaterhouseCoopers**
 18 **(Canada) was involved in --**
 19 A. No.
 20 **Q. -- the audits of Sigma?**
 21 A. No, I did not.
 22 **Q. And I know that you mentioned that you**
 23 **got an M.B.A., right?**
 24 A. Yes.
 25 **Q. You don't have any knowledge about**
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1 **R. Routhier**
 2 **auditing; is that fair to say?**
 3 A. Any knowledge? That's pretty broad.
 4 A little tiny knowledge about
 5 auditing, yes. A little bit. I mean, I
 6 understand that -- a little bit, but that it's a
 7 profession, for instance.
 8 **Q. Okay. But you yourself have no**
 9 **background in accounting or auditing, right?**
 10 A. None whatsoever.
 11 **Q. And you don't have any knowledge that**
 12 **would support that PwC (Canada) did anything**
 13 **wrong in connection with its audits of Sigma,**
 14 **correct?**
 15 A. Only that the fund was a fraud and
 16 that it was never uncovered, but beyond that, I
 17 have no idea of PwC (Canada)'s specific
 18 involvement in that.
 19 **Q. To be clear, it was Madoff who was a**
 20 **fraud, correct?**
 21 A. Yes. Correct.
 22 **Q. And it was Madoff who lost the money**
 23 **that St. Stephen's invested, correct?**
 24 A. Yes. I think -- yes, he's the root of
 25 the cause here, right? But a lot of people are
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1 R. Routhier
 2 involved in -- in sort of the safeguards along
 3 the way. That's what I meant.
 4 **Q. You understand that PwC (Canada) did**
 5 **not audit Bernard Madoff's firm, correct?**
 6 A. I don't know. I don't know that, no.
 7 **Q. So you don't even know what --**
 8 A. I don't know --
 9 **Q. -- PwC (Canada) is -- why PwC (Canada)**
 10 **was sued in this lawsuit; is that fair to say?**
 11 A. That's totally fair.
 12 MS. CRAWFORD: No further questions.
 13 MR. CATTELL: Victor, I have just a
 14 handful.
 15 MR. STEWART: Go ahead.
 16 FURTHER EXAMINATION BY
 17 MR. CATTELL:
 18 **Q. Mr. Routhier, you mentioned that there**
 19 **were a lot of safeguards along the way. Would**
 20 **you have considered -- excuse me. Would you**
 21 **consider the St. Stephen's Investment Committee**
 22 **as one of those safeguards?**
 23 A. Yes.
 24 **Q. Do you know who Gil Berman is?**
 25 A. No.
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1 R. Routhier
 2 **Q. Do you know of Harry Markopolous?**
 3 A. No.
 4 **Q. I'm going to read you a list of names**
 5 **and please tell me if you recognize any of them.**
 6 **Walter M. Noel, Jr.**
 7 A. I have heard his name as a principal
 8 at Fairfield Greenwich. Founder, I think.
 9 **Q. Did you have any communications with**
 10 **Walter M. Noel, Jr.?**
 11 A. No.
 12 **Q. Jeffrey Tucker?**
 13 A. No. I don't know the name, no.
 14 **Q. Andres Piedrahita?**
 15 A. No.
 16 **Q. Amit Vijay -- I'm butchering his last**
 17 **name -- Vijayvergiya?**
 18 A. No.
 19 **Q. Gregory Bowes?**
 20 A. No.
 21 **Q. Cornelis Boele?**
 22 A. No.
 23 **Q. David B. Horn?**
 24 A. No.
 25 **Q. Robert A. Blum?**
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1 **R. Routhier**
 2 A. No.
 3 **Q. Lourdes Barreneche?**
 4 A. No.
 5 **Q. Vianney d'Hendecourt?**
 6 A. No.
 7 **Q. Yanko Della Schiava?**
 8 A. No.
 9 **Q. Corina Noel Piedrahita?**
 10 A. No.
 11 **Q. Harold Greisman?**
 12 A. No.
 13 **Q. Jacqueline Harary?**
 14 A. No.
 15 **Q. Richard Landsberger?**
 16 A. No.
 17 **Q. Daniel Lipton?**
 18 A. No.
 19 **Q. Julia Luongo?**
 20 A. No.
 21 **Q. Mark McKeefry?**
 22 A. No.
 23 **Q. Maria Teresa Pulido Mendoza?**
 24 A. No.
 25 **Q. Charles Murphy?**
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1 **R. Routhier**
 2 A. No.
 3 **Q. Santiago Reyes?**
 4 A. No.
 5 **Q. Andrew Smith?**
 6 A. No.
 7 **Q. Philip Toub?**
 8 A. No.
 9 **Q. So, other than Walter M. Noel, who I**
 10 **believe -- well, excuse me. Withdraw the**
 11 **question.**
 12 **And for all the names that I just**
 13 **listed for you that you did not recognize, you**
 14 **did not have any communications with them**
 15 **either, correct?**
 16 A. Totally correct.
 17 MR. CATTELL: No further questions at
 18 this time.
 19 MR. STEWART: Does anyone else on your
 20 side have any questions?
 21 (No response.)
 22 MR. STEWART: All right. I may have a
 23 few. Just give me a minute to look over my
 24 notes.
 25 (Pause.)
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1 R. Routhier
 2 isn't it?
 3 MS. PIERCE: No further questions for
 4 me.
 5 MR. CATTELL: I think, subject to
 6 receiving the documents that we requested
 7 earlier in this deposition, we have no
 8 further questions at this time.
 9 MR. STEWART: Assuming there are any
 10 documents.
 11 MR. CATTELL: Of course. No further
 12 questions.
 13 MR. STEWART: Okay. Fine. I have
 14 nothing further.
 15 THE VIDEOGRAPHER: This concludes the
 16 deposition. We are going off the record at
 17 2:36 P.M.
 18 oOo
 19 _____
 20 RICHARD MICHAEL ROUTHIER
 21 Subscribed and sworn to
 22 before me this day
 23 of 2011.
 24 _____
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2
 3 CERTIFICATE
 4 STATE OF NEW YORK)
 : ss
 5 COUNTY OF NEW YORK)
 6 I, Kathy S. Klepfer, a Registered
 7 Merit Reporter and Notary Public within and
 8 for the State of New York, do hereby
 9 certify:
 10 That RICHARD MICHAEL ROUTHIER, the
 11 witness whose deposition is herein before
 12 set forth, was duly sworn by me and that
 13 such deposition is a true record of the
 14 testimony given by such witness.
 15 I further certify that I am not
 16 related to any of the parties to this action
 17 by blood or marriage and that I am in no way
 18 interested in the outcome of this matter.
 19 In witness whereof, I have hereunto
 20 set my hand this 30th day of August, 2011.
 21 _____
 22 KATHY S. KLEPFER, RPR, RMR, CRR, CLR
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