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UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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United States of America,	)	File No. 22-cr-223
	)	(NEB/DTS)
Plaintiff,	)	
	)	
v.	)	
	)	Courtroom 13W
Aimee Marie Bock(1),	)	Minneapolis, Minnesota
Salim Ahmed Said(3),	)	Tuesday, February 18, 2025
	)	9:59 a.m.
Defendants.	)	
	)	

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BEFORE THE HONORABLE NANCY E. BRASEL  
UNITED STATES DISTRICT COURT DISTRICT JUDGE

**VOLUME VI - JURY TRIAL PROCEEDINGS**

Court Reporter:                   RENEE A. ROGGE, RMR-CRR  
United States Courthouse  
300 South Fourth Street, Box 1005  
Minneapolis, Minnesota 55415

Proceedings recorded by mechanical stenography;  
Transcript produced by computer.

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1 8:59 a.m.

2 **IN OPEN COURT**

3 **(JURY PRESENT)**

4 THE COURT: Good morning, everyone. You may be  
5 seated.

6 And we are ready to go on the record with the  
7 government's next witness?

8 Mr. Jacobs.

9 MR. JACOBS: The United States calls Special Agent  
10 Jessica Klepadia.

11 THE COURT: Good morning. Would you raise your  
12 right hand.

13 JESSICA KLEPADIA,

14 called on behalf of the government, was duly sworn, was  
15 examined and testified as follows:

16 THE WITNESS: I do.

17 THE COURT: You may be seated.

18 And when you are settled there, could you state  
19 and spell both your first and last name for the record.

20 THE WITNESS: Jessica Klepadia, J-E-S-S-I-C-A,  
21 K-L-E-P-A-D-I-A.

22 THE COURT: Mr. Jacobs, you may inquire.

23 MR. JACOBS: Thank you, Your Honor.  
24  
25

DIRECT EXAMINATION

1  
2 BY MR. JACOBS:

3 Q. Good morning, Special Agent Klepadia.

4 A. Good morning.

5 Q. Could you please introduce yourself to the jury.

6 A. I'm Jessica Klepadia. I'm an FBI special agent.

7 Q. And how long have you been a special agent with the FBI?

8 A. Since June of 2014.

9 Q. Prior to June of 2014, who was your employer?

10 A. I was also employed by the FBI. I was support staff,  
11 professional staff, with the FBI as well.

12 Q. Can you explain generally speaking what are your duties  
13 and responsibilities as a special agent with the FBI?

14 A. Yep. Right now I'm assigned to the criminal, a criminal  
15 squad. It's called C2. It's a financial crimes squad. So  
16 we investigate different types of financial fraud to  
17 including embezzlement, bankruptcy fraud, investment fraud  
18 and then the different types of scams that there are out  
19 there.

20 There's also a few of us who investigate  
21 healthcare fraud on our squad.

22 Q. Can you also briefly explain to the jury the types of  
23 training that you receive as a special agent for the FBI?

24 A. So we train at the FBI academy in Quantico, Virginia.  
25 It's about a 20-week long program. We have different types

1 of classroom training, basically how to work investigations.

2 We have legal training and interviewing training.  
3 We learn about the different violations of the FBI that we  
4 work and also the different databases, the different systems  
5 that the FBI uses.

6 We learn how to do arrest warrants and search  
7 warrants, and then there's different practical exercises on  
8 how to do those with different scenarios, and then we are  
9 also trained on firearms, defensive tactics and physical  
10 fitness training.

11 Q. Following your full time at Quantico, do you receive  
12 ongoing training as part of your position as a special  
13 agent?

14 A. We do.

15 Q. And can you explain to the jury what that training  
16 entails?

17 A. So there's different types of annual training and then  
18 quarterly training, like we have to have firearms training  
19 and defensive tactics training every quarter.

20 We also do physical fitness training or our exam  
21 every year, and then there's, like I said, different types  
22 of annual training that we take throughout the year.

23 Q. Okay. I want to direct your attention now to this case.

24 At some point did you assist with the  
25 investigation in this particular case?

1 A. Yes.

2 Q. How so?

3 A. I was a team lead for one of the search sites.

4 Q. Okay. I want to take a step back. You said team lead  
5 at a search site?

6 A. Correct.

7 Q. As a special agent have you conducted searches of  
8 businesses before?

9 A. Yes.

10 Q. Approximately, how many?

11 A. It varies, but probably, you know, once every few  
12 months. So maybe 20.

13 Q. And have you received specialized training in conducting  
14 search warrants?

15 A. Yes.

16 Q. And can you explain what that training looks like?

17 A. Yes. So at the academy, like I said, we have search  
18 warrant training. So we have a unit called the Evidence  
19 Response Team, ERT. They come to Quantico for about a week,  
20 and they train us how to conduct searches and what goes into  
21 them.

22 Q. Okay. Now turning to January of 2022, did you  
23 participate in a search of the office of Total Financial  
24 Solutions at 2722 Park Avenue in Minneapolis?

25 A. Yes.

1 Q. Can you explain to the jury where that office location  
2 is located in Minneapolis?

3 A. Yeah, it's in South Minneapolis on Park Avenue.

4 Q. Prior to assisting with that search warrant, did you  
5 have any role in this investigation?

6 A. I did not.

7 Q. And subsequent to participating in that search warrant,  
8 did you have any role in this investigation?

9 A. I did not.

10 Q. Up until today?

11 A. Correct.

12 Q. Approximately, when did this search take place?

13 A. January 20th, 2022.

14 Q. And prior to executing that search warrant, did agents  
15 with the FBI obtain court authorized, a court authorization  
16 to search that location?

17 A. Yes.

18 Q. Were you the agent who obtained that authorization?

19 A. I was not.

20 Q. I think you mentioned that you were the team lead for  
21 that search.

22 A. Correct.

23 Q. What does it mean to be a team lead for a search?

24 A. So basically you are in charge of that search. You  
25 create an ops plan. You make sure you have the correct or

1 proper equipment and tools to do the search, the proper  
2 paperwork, and then you also assign roles to the  
3 participants who are helping with the search.

4 Q. Approximately, how many other participants were assigned  
5 to assist with this particular search?

6 A. There was about twelve of us.

7 Q. And, again, generally speaking, what were the different  
8 roles or possibilities of people assigned to this search?

9 A. Yep. So like I said the team lead, so I was in charge  
10 of the search. We have a photographer who takes pictures  
11 before and after. Excuse me. When you enter the search,  
12 they take photographs, and then before we leave we take  
13 photographs.

14 There's an evidence custodian, so they are keeping  
15 track of everything, all the evidence that we are taking.  
16 There's a photo logger writing down what pictures are being  
17 taken. There's also a sketcher who draws a sketch of what  
18 the area looks like.

19 Q. And in this particular case, what types of evidence were  
20 you authorized to search and seize at this location?

21 A. Evidence of fraud.

22 Q. And specifically relating to this investigation?

23 A. Yes.

24 Q. Can you explain to the jury from a high level how the  
25 search unfolded?

1 A. Yep. So we met around 6:30 that morning. We quick did  
2 a brief. Then we went and set up surveillance outside of  
3 the location, just to see if somebody was going to be  
4 entering or exiting the building. Nobody ended upcoming or  
5 going, so I made a phone call to an individual associated  
6 with the building.

7 That individual said -- and I let him know that we  
8 had a search warrant for the Suite 100. He advised that he  
9 would send a key holder to open the door for us. And so  
10 shortly after she arrived and then we entered the suite.

11 Q. And approximately how long did it take for the search to  
12 take place?

13 A. I think we started around 9:30 and ended around 1:30.

14 Q. After the search was concluded, what did you do?

15 A. We took pictures before we left. We made, there was a,  
16 the key holder was actually at the suite, so we secured the  
17 location with her and left a receipt for property with her.

18 And she had a copy of the search warrant, and then  
19 I took the evidence back to the FBI headquarters.

20 Q. And generally speaking, what types of evidence did you  
21 find at this location?

22 A. Documents and computers.

23 Q. So physical evidence like documents?

24 A. Correct.

25 Q. Pieces of paper?

1 A. Yes.

2 Q. And computers being digital evidence?

3 A. Yes.

4 Q. I'm going to show you what has already been admitted  
5 into evidence as Government Exhibit U8.

6 Can you tell the jury what we're looking at here  
7 in U8?

8 A. So this is the front of the building on the east side.  
9 It runs along Park Avenue. And it's a historic, it was a  
10 historic mansion that was made into businesses, office  
11 suites.

12 Q. Okay. So just to orient the jury, this is the building  
13 that you searched in January of 2022?

14 A. Correct.

15 Q. And you didn't search the entire building, right?

16 A. Correct.

17 Q. What did you have authorization to search?

18 A. Suite 100.

19 Q. That's one office complex within the building?

20 A. Yes.

21 Q. I'm going to pull up what has not yet been admitted into  
22 evidence as Government's FF1. Do you recognize this photo?

23 A. It's not on my screen. Is it -- oh, there it is. Yes.

24 Q. And what is this a photo of?

25 A. So this would have been the south side of the building

1 where the key holder showed up, and then we entered through  
2 that door.

3 Q. This was a photograph taken on the day of the search?

4 A. Yes.

5 MR. JACOBS: Your Honor, I offer Government  
6 Exhibit FF1.

7 THE COURT: Any objection.

8 MR. UDOIBOK: No objection.

9 MR. COLICH: No objection, Your Honor.

10 THE COURT: FF1 is admitted and may be published.

11 BY MR. JACOBS:

12 Q. Okay. Special Agent Klepadia, now the jury can see what  
13 you are looking at on this screen. And can you explain to  
14 them what we're looking at here in the first page of  
15 Government Exhibit FF1?

16 A. So this was the south side of the building, and we went  
17 up to the stairs, and she had unlocked that door, and then  
18 there was another set of stairs that we walked up to, and  
19 the suite was on the right.

20 Q. Okay. So I think you described the building that we saw  
21 in the previous picture as a historic mansion --

22 A. Yes.

23 Q. -- is that right? Are we looking at the backside of it?

24 A. This would have been the side -- well, the backside and  
25 the side of it, yes.

1 Q. So the picture we just looked at, that's kind of the  
2 reverse side by the street --

3 A. Correct.

4 Q. -- that we're peering onto?

5 A. Yes.

6 Q. Moving on to the next page, can you tell the jury what  
7 we're seeing here?

8 A. And this would have been the backside, the west side of  
9 the building.

10 Q. All right. One more picture?

11 A. And again, kind of the front side of the building and  
12 the side of it where we entered.

13 Q. Okay. And can you explain to the jury where you entered  
14 this building?

15 A. The south side here, the small door with the X on it at  
16 the bottom.

17 Q. All right. We're going to scroll through a few more of  
18 these. We're now looking at page 5 of these photographs.

19 What do we see here on page 5?

20 A. So this was on one of the walls pointing to Suite 100  
21 for Total Financial Solution, which was where the search  
22 warrant was for.

23 Q. Okay. So this is a printed out sign for TFS, Total  
24 Financial Solution?

25 A. Correct.

1 Q. What's your understanding of what Total Financial  
2 Solution is?

3 A. It's like a bookkeeping, tax company.

4 Q. All right. Looking at page 7, what is the jury looking  
5 at here in this photograph?

6 A. This would have been like the lounge area or waiting  
7 area in the Suite 100.

8 Q. Okay. So this is the actual suite that you searched?

9 A. Yes.

10 Q. And peering down, it looks like there's a couple of  
11 doors in this photograph. What do those go to?

12 A. Those would have been offices.

13 Q. Approximately, how many offices were in Suite 100?

14 A. About four.

15 Q. This is another view of that same lounge area?

16 A. Yes.

17 Q. What are we looking at here?

18 A. So this would have been the secretary's desk.

19 Q. Like a receptionist area?

20 A. Yes.

21 Q. It looks like there's a little kitchenette?

22 A. Yes. There was the kitchen and a conference room.

23 Q. This is the conference room you just mentioned?

24 A. Yes.

25 Q. What are we looking at on page 12 of this photograph?

1 A. This would have been one of the offices.

2 Q. Okay. And it looks like there's a computer on that  
3 desk?

4 A. Yes.

5 Q. Is that one of the computers that was searched and  
6 seized during the execution of that warrant?

7 A. Yes.

8 Q. Okay. You also mentioned physical evidence or  
9 paperwork, documentation. Is this some of the documentation  
10 from that search?

11 A. Yes.

12 Q. And to be clear, is this photograph how the FBI found  
13 that paperwork?

14 A. This one would have been, yes.

15 Q. You didn't arrange it like that. That's just a  
16 photograph of how they found it in the office?

17 A. Correct.

18 Q. It looks like maybe some tax documentation there?

19 A. Yes.

20 Q. I want to zoom in on this piece here. What are we  
21 looking at on, in this document?

22 A. An invoice for milk.

23 Q. Okay. And it looks like it's for gallons of milk?

24 A. Correct.

25 Q. 2,760 gallons of milk times four?

1 A. Yes.

2 Q. So just over 11,000 gallons of milk?

3 A. Yes.

4 Q. Special Agent Klepadia, do you know how much a gallon of  
5 milk weighs approximately?

6 A. 8.6 pounds approximately.

7 Q. So you trust me on the math that that's about  
8 94,000 pounds of milk in this invoice?

9 A. Yes.

10 Q. So about 40 tons of milk in this one invoice you found  
11 there?

12 A. Correct.

13 Q. Okay. And who is this invoice made out to?

14 A. Mankato Restaurant.

15 Q. Horseed Management/Stigma-Free?

16 A. Correct.

17 Q. Okay. And if we go up to the corner here, who is this  
18 invoice from?

19 A. It's Premuim -- I don't know if that's a spelling error  
20 -- but Premuim Fresh Produce LLC.

21 Q. Premuim spelled P-R-E-M-U-I-M?

22 A. Correct.

23 Q. Maybe a misspelling of premium?

24 A. Right.

25 Q. Okay. For 47 tons of milk?

1 A. Yes.

2 Q. Okay. Another office here?

3 A. Yes.

4 Q. You see in the corner a little sign that says D? What's  
5 the purpose of signs like that during a search?

6 A. All right. So we label the rooms also after we take  
7 photographs and while we're taking photographs just to be  
8 able to say this is where this item was found if there's  
9 lots of offices, and we know this was one of the offices  
10 labeled as D.

11 Q. It helps agents keep track of the evidence?

12 A. Correct.

13 Q. There's another computer in this office?

14 A. Yes.

15 Q. That's one of the computers that was searched?

16 A. Seized, yep, and searched.

17 Q. This is another office labeled E?

18 A. Yes.

19 Q. Similarly, another computer in there?

20 A. Yes.

21 Q. Another office here?

22 A. Yes.

23 Q. Okay. Moving on to page 22, this is more physical  
24 documentation from the search?

25 A. Yes.

1 Q. Page 24 here, more physical documentation?

2 A. Yes.

3 Q. Okay. I want to show you, speaking of physical files, I  
4 want to show you what is not in evidence marked for  
5 identification it's government's FF2.

6 Do you recognize generally what this document is?

7 A. Yes.

8 Q. What is it?

9 A. It's a folder labeled 19.

10 Q. Obtained from the search of that office?

11 A. Right.

12 Q. Is it a true and accurate copy of files obtained from  
13 the search of that office?

14 A. Yes.

15 MR. JACOBS: Your Honor, the government would  
16 offer FF2.

17 THE COURT: Any objection?

18 MR. UDOIBOK: No objection.

19 MR. COLICH: No objection Your Honor.

20 THE COURT: FF2 is admitted.

21 BY MR. JACOBS:

22 Q. And in the course of prepping for your testimony today,  
23 did you have an opportunity to review other government  
24 exhibits obtained during the search of this office?

25 A. Yes.

1 MR. JACOBS: Your Honor, at this time we also  
2 offer Government's FF3 through FF11, FF16, FF17, FF22, FF24,  
3 FF26 through FF31, FF33, FF35 through FF39.

4 THE COURT: Any objection?

5 MR. COLICH: Your Honor, I would like to reserve  
6 the right to object to each of these individually if I have  
7 an objection at the time. There's so many exhibits. In my  
8 mind, I can't keep track of what these are.

9 So at this point, I have no objection to the  
10 introduction, but I would like to reserve the right to  
11 object to one or the other if I feel it's needed.

12 THE COURT: Mr. Udoibok.

13 MR. UDOIBOK: Same.

14 THE COURT: All right. FF3 through 11, 16, 17,  
15 22, 24, 26 through 31, 33 and 35 through 39 are  
16 conditionally.

17 BY MR. JACOBS:

18 Q. And, Special Agent Klepadia, similarly now talking about  
19 digital devices, did you have an opportunity to review files  
20 obtained from the search of the computers at these  
21 locations?

22 A. Yes.

23 Q. And did you review Government FF50, FF60, FF70 and FF80?

24 A. Yes.

25 Q. What were those documents?

1 A. Those were images from the computers that were taken  
2 from that location.

3 MR. JACOBS: Your Honor, we would offer  
4 Government's FF50, FF60, FF70, and FF80.

5 THE COURT: And those are computer images?

6 MR. JACOBS: Those are files from, obtained from  
7 the computer, correct.

8 THE COURT: Any objection?

9 MR. UDOIBOK: Same conditional objection.

10 MR. COLICH: Same thing, Your Honor.

11 THE COURT: FF60, 70, 80 -- 50, 60, 70 and 80 are  
12 conditionally admitted.

13 MR. JACOBS: Oh, Your Honor, permission to publish  
14 all or some of these to the jury?

15 THE COURT: Yes.

16 MR. JACOBS: I want to walk through some of these  
17 documents. Okay?

18 THE WITNESS: Okay.

19 BY MR. JACOBS:

20 Q. I'm pulling up Government FF5. Can you tell the jury  
21 what we're looking at here in FF5?

22 A. A folder that says Safari Restaurant.

23 Q. Again, this was obtained during the search of 2722 Park?

24 A. Right.

25 Q. All right. Scrolling down to the second page here, what

1 are we looking at here?

2 A. The summer meal counts clicker page.

3 Q. And the sponsor for this meal count is who?

4 A. Feeding Our Future.

5 Q. And the site location is what?

6 A. Safari Restaurant.

7 Q. All right. The date that we see here is for the week  
8 of?

9 A. January 1st, 2021.

10 Q. Okay. And how many meals according to this meal count  
11 are being claimed to serve?

12 A. 6,000 on Friday and Saturday.

13 Q. And that was for breakfast. This one here for lunch?

14 A. Yes.

15 Q. And as I'm scrolling through page 5, 6, 7, 8, consistent  
16 throughout those pages?

17 A. Correct.

18 Q. Okay. I'm pulling up another exhibit in evidence, which  
19 is FF6.

20 So that last meal count we looked at was for  
21 Safari Restaurant. What does this folder say?

22 A. ASA Limited.

23 Q. Okay. Another document obtained from that office?

24 A. Correct.

25 Q. Or series of documents?

1 A. Yes.

2 Q. And I should take a step back. This is a scan of an  
3 image. What is the actual document that was seized?

4 A. I'm not sure.

5 Q. Okay. Maybe a file folder?

6 A. It looks like that, yes.

7 Q. Going now to page 2 here, another meal count sheet?

8 A. Correct.

9 Q. And can you read us off the sponsor and the site?

10 A. The sponsor was Feeding Our Future, and the site was ASA  
11 Limited.

12 Q. Okay. And this one was for the week of?

13 A. December 1st, 2021.

14 Q. A month earlier than the last one we just saw?

15 A. Correct.

16 Q. And what were the numbers of meals received and prepared  
17 according to this meal count sheet for ASA Limited?

18 A. 2,000 for Wednesday through Saturday.

19 Q. Scrolling now. Page 3, 4 through 6, consistent through  
20 those pages and the meal counts?

21 A. Correct.

22 Q. This particular one, this particular one is for the week  
23 of 12/19?

24 A. Correct.

25 Q. So this is the week of Christmas, 2,000 meals?

1 A. Yes.

2 Q. All right. Showing you FF16, another file folder?

3 A. Yes.

4 Q. What's this one labeled?

5 A. Stigma.

6 Q. And going down to the fourth page here, can you read us  
7 a sponsor and the site of this meal count?

8 A. Sponsor, Feeding Our Future. The site was Stigma-Free,  
9 Mankato.

10 Q. Okay. And this one jumps ahead in time a little bit,  
11 but which week is this for?

12 A. April 1st, 2021.

13 Q. And again, can you give the jury a sense of the meals  
14 claimed to be served for that week?

15 A. 3,000 for Thursday through Saturday.

16 Q. And again scrolling page 5 and 6, consistent through  
17 those pages, generally speaking?

18 A. Yes.

19 Q. 3,000 meals claimed to be received and prepared?

20 A. Correct.

21 Q. Okay. Pulling up FF22, another file folder?

22 A. Yes.

23 Q. And what does this one say?

24 A. Tunyar.

25 Q. Scrolling down to the second page, let's do the same

1 thing. Can you tell the jury the sponsor and the site?

2 A. Sponsor is Feeding Our Future. Site is Stigma-Free,  
3 Willmar.

4 Q. This is for the week of what?

5 A. December 1st, 2021.

6 Q. And again, how many meals does this meal count sheet  
7 claim to receive and prepared that week?

8 A. On Wednesday through Saturday, 2,000 each day.

9 Q. Scrolling to page 3, the following week, how many meals?

10 A. The same, 2,000 from Sunday through Saturday.

11 Q. Okay. Pulling up FF24, what does this file folder say  
12 on it?

13 A. Olive Management.

14 Q. And the sponsor is Feeding Our Future. What is this  
15 site for?

16 A. Olive Management, St. Cloud.

17 Q. And same week of December 1st, 2021?

18 A. Yes.

19 Q. And again, number of meals that this form claims were  
20 received and prepared is how many?

21 A. Wednesday 2,000, Thursday 2,003, Friday 2,001, and  
22 Saturday 2,004.

23 Q. How many kids claimed that they were requesting meals  
24 once the food is gone?

25 A. On Wednesday 40, Thursday 45, Friday 50 and Saturday 35.

1 Q. Okay. Going down to page 3 and 4 and 5, similar numbers  
2 of meals claimed that were received and prepared in those  
3 weeks?

4 A. Yes.

5 Q. Pulling up FF27. Can you tell the jury what they're  
6 seeing in this exhibit?

7 A. A folder for Gaur Limited.

8 Q. Okay. Going down to page 2, who is the sponsor and  
9 what's the site?

10 A. The sponsor, Feeding Our Future. Site, Bet on Better  
11 Future/Gaur.

12 Q. Okay. Here again, we're in what week?

13 A. December 1st, 2021.

14 Q. And can you tell the jury how many meals, according to  
15 this meal count form, they were claiming to have received  
16 and prepared in that week?

17 A. 2,150 from Wednesday through Saturday.

18 Q. Going on to page 3 and 4 and 5, similar numbers of meals  
19 claimed?

20 A. Yes.

21 Q. Pulling up FF30, what is the caption of this file  
22 folder?

23 A. Brava Restaurant.

24 Q. Same thing. Sponsor and site?

25 A. Sponsor, Feeding Our Future. Site, Brava Restaurant

1 AS/SFSP.

2 Q. Same week of December 1st, 2021?

3 A. Yes.

4 Q. And how many meals were being claimed, according to this  
5 meal count sheet, for that week that were received and  
6 prepared at Brava Restaurant?

7 A. 2,000 from Wednesday through Saturday.

8 Q. The next week, how many meals were claimed?

9 A. The same 2,000 from Sunday through Saturday.

10 Q. Week of 12/12?

11 A. Same 2,000 from Sunday through Saturday.

12 Q. Okay. I just want to look at a couple more.

13 Pulling up Government Exhibit FF35. This is  
14 another meal count sheet?

15 A. Yes.

16 Q. And which sponsor and site is this for?

17 A. Sponsor, Feeding Our Future. Site, Stigma-Free  
18 International, St. Cloud.

19 Q. Okay. This is -- we jump ahead in time a little bit  
20 here. What is this for the week of?

21 A. April 25th, 2021.

22 Q. Okay. And can you tell the jury how many meals are  
23 being received or prepared according to this meal count  
24 sheet?

25 A. 2,000 on Saturday.

1 Q. And moving ahead to page 2, the following week of  
2 May 2nd, 2021, how many meals are being claimed according to  
3 this meal count sheet?

4 A. 2,000 from Sunday through Saturday.

5 Q. Page 3 and page 4, moving ahead a few weeks, same number  
6 of meals?

7 A. Yes.

8 Q. Pulling up Government Exhibit FF36. Sponsor is Feeding  
9 Our Future. What site is this one for?

10 A. Stigma-Free International, Waite Park.

11 Q. Okay. And this, the supervisor here, can you make out  
12 the name there?

13 A. Hamdi Omar.

14 Q. Okay. And it's for the week of what?

15 A. April 25th, 2021.

16 Q. And this looks like it starts on Saturday, but how many  
17 meals were being claimed for that one day of this week?

18 A. 2,000.

19 Q. Okay. Moving up to the week of May 2nd, how many meals?

20 A. 2,000 from Sunday through Saturday.

21 Q. The week of 5/29 and the week of 5/16 the same?

22 A. Yes.

23 Q. Okay. One more. Showing you Government Exhibit F38,  
24 what is this file folder labeled with?

25 A. Southcross.

1 Q. Moving down to the meal count sheet, can you tell us the  
2 sponsor and the site?

3 A. Sponsor, Feeding Our Future. Site, Bet on Better  
4 Future/Southcross.

5 Q. Okay. And now we're going back in time a little bit.  
6 This is for the week of what?

7 A. December 1st, 2021.

8 Q. And how many meals are being claimed for that week per  
9 day?

10 A. 2,500 from Wednesday through Saturday.

11 Q. Okay. Following week how many meals?

12 A. The same 2,500 from Wednesday through Saturday.

13 Q. All of those were found in that 2722 Park office  
14 location?

15 A. Correct.

16 Q. For Total Financial Solutions?

17 A. Yes.

18 MR. JACOBS: No further questions, Your Honor.

19 THE COURT: Mr. Udoibok.

20 MR. UDOIBOK: Yes, Your Honor.

21 Kristine, would you give Ms. Mallet access?

22 CROSS-EXAMINATION

23 BY MR. UDOIBOK:

24 Q. Agent, my name is Kenneth Udoibok. I just have a few  
25 questions for you.

1                   Why don't you pull up Government Exhibit FF1.

2                   You testified earlier about this building. Is it  
3 a Feeding Our Future building?

4 A. There were documents there for Feeding Our Future.

5 Q. Do you know who owns it?

6 A. Excuse me?

7 Q. Do you know who owns it?

8 A. No, not off the top of my head.

9 Q. Do you know, did you meet Ms. Bock in that building in  
10 any way?

11 A. No.

12 Q. I want to talk a little bit about Government  
13 Exhibit FF5.

14                   Go to the second page, please.

15                   You testified earlier about it's a meal count,  
16 correct?

17 A. Yes.

18 Q. Do you know whose signature that is?

19 A. I do not.

20 Q. Do you believe it is Ms. Bock's?

21 A. I can't read it. I don't know whose it is.

22 Q. Now, do you know how this meal count got to the  
23 building?

24 A. I do not.

25 Q. Let's go to F6, FF6 then. Second page.

1           On this document can you tell how many children  
2 requested food, but were not able to receive?

3           A. Yes. It says on Wednesday 42, Thursday 41, Friday 40  
4 and Saturday 41.

5           Q. Now, do you know who signed this document?

6           A. I can't read that one either.

7           Q. Do you believe it was signed by Ms. Bock?

8           A. It doesn't appear to be. I guess I don't know what her  
9 signature looks like, but it doesn't appear that way.

10          Q. Counsel walked you through a series of the FF documents  
11 representing different sites, correct?

12          A. Yes.

13          Q. Now, do you know in FF5, you testified that that was  
14 Safari, correct?

15          A. I don't remember which one was FF5. Okay. Yes, Safari.

16          Q. Who owns Safari? Do you know? If you don't know you  
17 don't know.

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

19          Q. Do you believe that Ms. Bock owned Safari Restaurant?

20          A. From my understanding, I don't think she was involved  
21 with -- or was the owner of it.

22          Q. All right. F6, you testified earlier that that was ASA.  
23 If you go to S, just so you know.

24                 Do you believe Ms. Bock owned ASA?

25          A. I'm not sure.

1 Q. What about FF16?

2 Go to the fourth page.

3 And you testified earlier about FF16 -- excuse  
4 me -- being Stigma-Free, correct?

5 A. Stigma-Free, Mankato, yes.

6 Q. Do you believe Ms. Bock owns Stigma-Free, Mankato?

7 A. I'm not sure.

8 Q. Now of all the sites that I have just questioned you  
9 about, do you believe Ms. Bock owned any of the sites?

10 A. Again, I'm not sure.

11 Q. Let's go to FF38, just for an example.

12 MS. MALLETT: Which one?

13 MR. UDOIBOK: FF38.

14 BY MR. UDOIBOK:

15 Q. That's Southcross. Do you believe Ms. Bock owned it?

16 A. I'm not sure.

17 Q. You don't have any information as to the ownership, do  
18 you?

19 A. Correct. I'm not the case agent.

20 Q. All right. What about FF36, just for example?

21 What site is that?

22 A. The site was Stigma-Free International, Waite Park.

23 Q. Same, do you believe Ms. Bock owned that site?

24 A. Again, I'm not sure.

25 Q. Ms. Mallett, if you highlight the email.

1                   You testified earlier that that was Ms. Bock's  
2 email address, correct?

3           A.   I did not.

4           Q.   Do you know whose address is that?

5           A.   It says aimee@feedingourfuturemn.org.

6           Q.   Do you believe because that email is there, therefore  
7 the owner of that email wrote those numbers in?

8           A.   I'm not sure.

9           Q.   Okay.

10                   MR. UDOIBOK:  No further questions.

11                   THE COURT:  Mr. Colich.

12                   MR. COLICH:  Thank you, Your Honor.

13   CROSS-EXAMINATION

14           BY MR. COLICH:

15           Q.   Good morning.

16           A.   Good morning.

17                   MR. COLICH:  Joe, can you pull up --

18   (Counsel confer)

19           BY MR. COLICH:

20           Q.   This is FF5 page 2.  And does that appear to be a summer  
21 meal count clicker?

22           A.   Correct.

23           Q.   All right.  Could you kindly go to the initials of the  
24 person --

25   (Counsel confer)

1 BY MR. COLICH:

2 Q. So I'm directing your attention to that paragraph says,  
3 "Initials of person taking daily meal count certifying that  
4 the information is true and accurate."

5 You see that?

6 A. Yes.

7 Q. And then go across the columns, and at the end you see  
8 two initials AS; is that correct?

9 A. Yes.

10 Q. And this was identified as being from Safari  
11 Restaurants, correct?

12 A. The site Safari Restaurant, yes.

13 Q. Yes. Okay. Who is AS?

14 A. I don't know.

15 Q. Okay. Whoever it is is certifying that that's accurate.

16 A. That's what it appears, yes.

17 Q. Okay. Could you go to Exhibit FF6, second page. Same  
18 line, if you would.

19 Now the one that says, "Initials of the person  
20 taking" -- oh, yes.

21 Okay. So this is the site for ASA Limited from  
22 the file that you recovered in your search. And I'm  
23 directing your attention again to the line, "Initials of  
24 person taking daily meal count certifying that the  
25 information is true and accurate."

1                   And does that appear to be AA to you?

2           A.   Yes.

3           Q.   You don't know who AA is?

4           A.   I do not.

5           Q.   Okay.  Could we go to Olive Management, please.  That  
6           would be FF24.  I believe that's the second page also.

7                   We're going to go to that same line.  Are you able  
8           to see that?

9           A.   Yes.

10          Q.   Now, this is Olive Management.  Do you know who owned  
11          Olive Management, by any chance?

12          A.   I do not.

13          Q.   Okay.  And you see that, "Initials of the person taking  
14          daily meal count certifying that the information is true and  
15          accurate."

16                   Do you see that line?

17          A.   I do.

18          Q.   And do you see the initials NA.  Do you know by any  
19          chance who NA is?

20          A.   I do not.

21          Q.   Would it be fair to say that wasn't your task to figure  
22          out who was certifying these by their initials?

23          A.   That's fair, yes.

24          Q.   But would it be accurate to say that all of these after  
25          meal count clickers generally, I'm generalizing, would have

1 someone signing their initials indicating that the count is  
2 certified by them as true and accurate?

3 MR. JACOBS: Objection, Your Honor. Foundation.

4 THE COURT: Overruled.

5 You may answer if you can.

6 THE WITNESS: This one appears to be. I don't  
7 know if they all have that.

8 BY MR. COLICH:

9 Q. It's a form that tells the recipient or anyone else  
10 interested that in this case NA certifies that that's a true  
11 count based on this document, correct?

12 A. That's what it looks like, yes.

13 Q. So I'm not going to go over all of these documents you  
14 saw today, but there's a lot of FF evidence that you helped  
15 introduced today, correct?

16 A. Yes.

17 Q. And you noted there were a lot of different meal counts,  
18 and you did them in fact for Safari Restaurant and ASA  
19 Limited, correct?

20 A. Yes.

21 Q. You did it for Stigma-Free, Mankato, Tunyar Trading,  
22 correct?

23 A. Yes.

24 Q. Olive Management? You did that? We talked about that  
25 earlier.

1 A. Yes.

2 MR. COLICH: Yes, the one that's on --

3 Thank you, counsel.

4 You did it for Brava Restaurants?

5 THE WITNESS: Yes.

6 BY MR. COLICH:

7 Q. Stigma-Free, St. Cloud?

8 A. Yes.

9 Q. Stigma-Free, Waite Park?

10 A. Correct.

11 Q. And Southcross?

12 A. Yes.

13 Q. And you don't know who owns Stigma-Free, Waite Park, do  
14 you?

15 A. I do not.

16 Q. Okay. But in all of the testimonies you today regarding  
17 these sites, you were shown at least one copy of an  
18 after-school meal count, correct?

19 A. Yes.

20 Q. And so on all of these documents, whoever's initials  
21 appear at the bottom on that line is the person who is  
22 certifying a true and accurate count of meals; is that  
23 correct?

24 A. That's what it says, yes.

25 Q. And wherever this document goes, it goes as a result of

1 the people whose initials are on this document saying that's  
2 the truth and accurate count?

3 MR. JACOBS: Objection, Your Honor. Foundation.

4 MR. COLICH: I'll withdraw the question.

5 Nothing else.

6 THE COURT: Redirect.

7 REDIRECT EXAMINATION

8 BY MR. JACOBS:

9 Q. Special Agent Klepadia, I'm pulling up Government  
10 Exhibit FF5 on the second page.

11 You were asked a question on cross about if Aimee  
12 Bock were the owner of Safari Restaurant; is that right?

13 A. Yes.

14 Q. Is Salim Said one of the owners of Safari Restaurant?

15 A. Yes, that seems correct.

16 Q. And the sponsor, according to this form, is who?

17 A. The sponsor is Feeding Our Future.

18 Q. And who is the executive director of Feeding Our Future?

19 A. Aimee Bock.

20 Q. And was Feeding Our Future the sponsor on each and every  
21 one of the meal count sheets that we've looked at today?

22 A. Yes.

23 MR. JACOBS: No further questions, Your Honor.

24 THE COURT: You may step down. Thank you.

25 And the government may call its next witness.

1 MR. THOMPSON: Thank you, Your Honor. The  
2 government calls Postal Inspector John Western.

3 THE COURT: Good morning.

4 THE WITNESS: Good morning.

5 JOHN WESTERN,  
6 called on behalf of the government, was duly sworn, was  
7 examined and testified as follows:

8 THE WITNESS: I do, Your Honor.

9 THE COURT: Thank you. You may be seated.  
10 And when you are settled, please state and spell  
11 both your first and last name for the record.

12 THE WITNESS: Yep. John Western, J-O-H-N,  
13 W-E-S-T-E-R-N.

14 THE COURT: Mr. Thompson, you may inquire.

15 MR. THOMPSON: Thank you, Your Honor.

16 DIRECT EXAMINATION

17 BY MR. THOMPSON:

18 Q. Good morning, Inspector Western.

19 A. Good morning.

20 Q. How are you?

21 A. Good.

22 Q. Could you tell the jury where you work?

23 A. Yeah. I work for the U.S. Postal Inspection Service,  
24 which is the law enforcement branch of the postal service.

25 Q. What is your job title at the Postal Inspection Service?

1 A. Postal inspector.

2 Q. What are your responsibilities as a postal inspector?

3 A. We're sworn federal agents, and we investigate numerous  
4 crimes that have a nexus to the U.S. mail, drugs in the  
5 mail, bombs in the mail, mail theft, assaults and homicides  
6 of our employees.

7 Q. Are you assigned to a particular group or have a certain  
8 type of crime that you typically investigate?

9 A. Yeah, I'm assigned to the mail fraud or white color  
10 group.

11 Q. And what kind of cases do you investigate in that group?

12 A. Particularly mail fraud cases, and we get involved with  
13 cases, larger cases, with other agencies such as the FBI,  
14 investigating wire fraud, et cetera.

15 Q. Did you receive training prior to becoming a postal  
16 inspector?

17 A. I did.

18 Q. First off, what's your educational background?

19 A. I'm a graduate of the University of Minnesota.

20 Q. Okay. And when did you join the Postal Inspection  
21 Service?

22 A. In 2007.

23 Q. Did you get training when you joined?

24 A. Yes.

25 Q. Could you tell us briefly what kind of training you

1 received?

2 A. It was three months of training out in Potomac,  
3 Maryland, training on how to conduct search warrants,  
4 officer safety, legal training, stuff like that.

5 Q. Okay. Inspector Western, have you been involved in the  
6 investigation into Feeding Our Future and this larger  
7 federal scheme to defraud the Federal Child Nutrition  
8 Program?

9 A. Yes.

10 Q. What is your role in the investigation?

11 A. I'm one of the investigators.

12 Q. And you said I think before you often work with  
13 investigators from other agencies; is that right?

14 A. Correct.

15 Q. Is that true on this case as well?

16 A. Yes.

17 Q. What other agencies are involved in this investigation?

18 A. The FBI and IRS.

19 Q. Okay. Now Inspector Western, I want to today talk to  
20 you about a portion of the investigation. Okay?

21 A. Okay.

22 Q. And first off, I want to begin by talking about what  
23 happened in the Federal Child Nutrition Program in the  
24 summer of 2020 after COVID.

25 Generally, were there issues in the program in the

1 summer and fall of 2020?

2 A. Yeah. The number of participants exploded, and there  
3 was issues. There was suspicions by the Minnesota  
4 Department of Education that some of these places were not  
5 legitimate. There would be places signing up three  
6 different charitable sites and one particular address or  
7 attempting to do so.

8 Q. How would you describe the number of sites that were  
9 opened in this spring and into the summer in 2020?

10 A. A lot. Hundreds.

11 Q. Okay. And the number of claims I think you said went  
12 up; is that right?

13 A. Yes.

14 Q. Significantly?

15 A. Yes.

16 Q. Okay. Defendant Salim, Salim Said is one of the  
17 defendants in this case; is that right?

18 A. That's correct.

19 Q. And did he have some organizations enrolled that were  
20 active in the program in the summer of 2020?

21 A. Yes.

22 Q. What were those?

23 A. Safari Restaurant, ASA Limited.

24 Q. Okay. Let's start with Safari Restaurant. Did that  
25 show some of the hallmarks that or was that one of the

1 entities that raised MDE's concerns?

2 A. Yes.

3 Q. Why was that?

4 A. They were claiming to feed 5,000 kids a day.

5 Q. I'm going to direct your attention to Government  
6 Exhibit B63 and specifically page 14.

7 What do you see at Government Exhibit B63 at  
8 page 14?

9 A. There is a meal count sheet.

10 Q. Okay. And this is from what time frame and for what  
11 site?

12 A. The site is Safari Restaurant, and the time frame is the  
13 week of August 9th, 2020.

14 Q. Okay. And what did the meal counts -- how many meals  
15 was Safari Restaurant claiming to serve or how many kids  
16 were they claiming to serve in August of 2020?

17 A. Well, they claimed to prepare 5,000. If you go down a  
18 couple lines, they are claiming to serve just short of that  
19 for number of kids.

20 Q. Every day?

21 A. Every day.

22 Q. Seven days a week?

23 A. Seven days a week.

24 Q. Is that week after week?

25 A. Yes.

1 Q. Okay. And just paging through page 15, page 16, it  
2 looks like there's multiple types of meals that they're  
3 claiming to serve; is that right?

4 A. Correct.

5 Q. Lunch and snack?

6 A. Yes.

7 Q. 5,000 of each roughly?

8 A. Yes.

9 Q. And who signed these counts in August of 2020?

10 A. Salim Said.

11 Q. Okay. You said Mr. Said had another site that was  
12 opened in the summer of or in 2020 that raised the concerns;  
13 is that right?

14 A. Yeah.

15 Q. What was that entity?

16 A. ASA Limited.

17 Q. Okay. And how many meals a day was ASA Limited or did  
18 Salim Said claim that ASA Limited was serving?

19 A. Between two and three thousand a day.

20 Q. I'm going to direct your attention to Government  
21 Exhibit C4.

22 This is not yet in evidence, Your Honor.

23 I'll show you what's been marked but not yet  
24 admitted as Government Exhibit C4, how about.

25 A. Okay.

1 Q. Do you recognize Government Exhibit C4?

2 A. Yes.

3 Q. It's an email; is that right?

4 A. Correct.

5 Q. From Abdikerm Eidleh to Abdihakim Ahmed?

6 A. That's correct.

7 THE COURT: C4 is in evidence.

8 MR. THOMPSON: Oh, it is. Great.

9 Okay. Well, I'll publish it to the jury then if I  
10 may.

11 BY MR. THOMPSON:

12 Q. All right. Inspector Western, could you describe for us  
13 the meal counts starting at page 2 on Government Exhibit C4?

14 A. Yeah. Similar to the previous ones, this is the meal  
15 count sheet for the site ASA Limited for the week of  
16 September 27th, 2020. Meal type is breakfast.

17 Q. And how many a day?

18 A. It said they prepared 3,000 meals every day and just  
19 under 3,000 kids served.

20 Q. Okay. 2,990 plus every day?

21 A. Correct.

22 Q. And that goes on every day; is that correct?

23 A. That's correct.

24 Q. And again, Salim Said is one of the owners of ASA  
25 Limited?

1 A. Correct.

2 Q. Okay. ASA Limited and Safari Restaurant, they are  
3 for-profit companies; is that correct?

4 A. That's correct.

5 Q. At some point did MDE implement or communicate a rule  
6 change to entities involved in the food program?

7 A. Yes. Around September 25th of 2020, they implemented a  
8 rule change where the sites had to be nonprofits.

9 Q. So for-profit entities couldn't participate anymore; is  
10 that right?

11 A. That's correct.

12 Q. And why was that change made?

13 A. Because of the suspicions and the exponential growth of  
14 the number of sites.

15 Q. Okay. There's several things happened after that change  
16 was implemented, is that right, Inspector Western?

17 A. Yes.

18 Q. Okay. One, I want to direct your attention to  
19 Government Exhibit F7.

20 And this is an email that's in evidence from Aimee  
21 Bock to MDE, dated October 20th of 2020; is that right?

22 A. Yes.

23 Q. And its subject line: For-Profit Restaurant  
24 Clarifications; is that right?

25 A. Correct.

1 Q. And it says, "Please see the attached clarification of  
2 how Feeding Our Future will be operating some of our sites.

3 Is that correct?

4 A. Correct.

5 Q. And directing your attention to the second page, what is  
6 the nature of the clarification that Aimee Bock provides  
7 with respect to that ASA Limited site owned by Salim Said?

8 A. You want me to read it.

9 Q. Yep.

10 A. "This site is being staff by Feeding Our Future. The  
11 site operators will not prepare the meals and funds will not  
12 be provided, given or otherwise paid to the site to employ  
13 site staff. Only Feeding Our Future's trained staff and  
14 volunteers and sponsor trained site staff serving as  
15 volunteers are permitted to distribute the meals."

16 Q. What was the effect of that clarification provided by  
17 Ms. Bock?

18 A. The effect?

19 Q. Yes.

20 A. Well, basically it was, she was trying to cover the fact  
21 that because her agents, the Feeding Our Future was a  
22 nonprofit, they would be doing the, they would be operating  
23 that site.

24 Q. So ASA Limited could continue to participate in the  
25 program?

1 A. That's correct.

2 Q. Despite being a for-profit entity?

3 A. Correct.

4 Q. Directing your attention to page 6 of Government  
5 Exhibit F7, does Ms. Bock provide a similar message to MDE  
6 with respect to Safari Restaurant?

7 A. Yes, it's the same message.

8 Q. And what was the effect of that?

9 A. Effect of that was the same. She said because she was a  
10 nonprofit, she would be or her entity would be running the  
11 site. Therefore, Safari could stay in the program.

12 Q. Okay. Now, those were Salim Said's two companies as of  
13 the fall of 2020, correct?

14 A. Correct.

15 Q. They were able to stay in the program because of  
16 Ms. Bock's communication; is that right?

17 A. That's correct.

18 Q. Did Salim Said in the other -- and he had partners in  
19 Safari Restaurant, correct?

20 A. Yes, he did.

21 Q. Did he and others involved with Safari Restaurant open  
22 additional sites --

23 A. Yes.

24 Q. -- after that, that guidance was rolled out from MDE?

25 A. Yes.

1 Q. How did they go about doing that?

2 A. They acquired a nonprofit company or took over a  
3 nonprofit company.

4 Q. When did they acquire or take over a nonprofit company?

5 A. Just a little more than a week after this rule was  
6 implemented.

7 Q. In October of 2020?

8 A. Correct.

9 Q. And after they acquired this nonprofit company, what did  
10 they do with it?

11 A. They started food sites.

12 Q. In the name of the nonprofit?

13 A. Correct.

14 Q. How many food sites?

15 A. One in Willmar, one in Mankato, one in St. Cloud, one in  
16 Waite Park, and one in St. Paul. At least five.

17 Q. Okay. What was the name of the nonprofit that they  
18 acquired?

19 A. Stigma-Free International.

20 Q. Okay. So, Inspector Western, I want to talk to you a  
21 little bit about how they acquired this nonprofit called  
22 Stigma-Free International. Okay?

23 A. Sure.

24 Q. First off, what is Stigma-Free International or what was  
25 it?

1 A. Stigma-Free International was a nonprofit, and according  
2 to their IRS records, documents, application for nonprofit  
3 status, it was to be used for, to combat the stigma around  
4 mental illness or mental health issues.

5 Q. Okay. And how would you describe the company? When was  
6 it formed, first off?

7 A. When?

8 Q. Yes.

9 A. 2019, August 2019.

10 Q. What kind of operations did it have?

11 A. Based on the bank records, I would say none.

12 Q. What do you mean by that?

13 A. It appeared to operate as a shell company and had one  
14 initial deposit when the bank account was opened, and then  
15 it had a monthly administration fee from the bank, and that  
16 was it.

17 Q. No economic activity?

18 A. No. None.

19 Q. Did it have any employees?

20 A. None.

21 Q. Did it have an office?

22 A. No. It had -- it was a residence of the person who  
23 formed it.

24 Q. And who formed it?

25 A. An individual by the name of Jamal Osman.

1 Q. Okay. Inspector, I want to show you now what's been  
2 marked but not yet admitted as Government Exhibit F20.

3 And are these the Secretary of State records  
4 showing the incorporation of the organization of Stigma-Free  
5 International?

6 A. Yes.

7 MR. THOMPSON: Your Honor, I move to admit  
8 Government Exhibit F20.

9 THE COURT: Any objection?

10 MR. UDOIBOK: No objection.

11 MR. COLICH: No objection.

12 THE COURT: F20 is admitted.

13 MR. THOMPSON: Permission to publish, Your Honor?

14 THE COURT: Yes.

15 BY MR. THOMPSON:

16 Q. Inspector Western, do you see Government Exhibit F20 up  
17 on the screen?

18 A. I do.

19 Q. Because we see a lot of paper in this case, can you  
20 orient the jury as to what we are looking at here. I know  
21 you look at these sheets a lot, right?

22 A. Yeah. We're looking at a certificate of incorporation  
23 that's got the seal of the Minnesota Secretary of State.

24 Q. Okay. So let's take it at the basic level. First off,  
25 what's a certificate of incorporation?

1 A. You apply for it at the Secretary of State's office, and  
2 that's what they give you to say that here you are,  
3 according to the state, your business is recognized.

4 Q. If anyone wants to open a company, that's how they go  
5 about doing it?

6 A. Correct.

7 Q. Okay. And the name of the company here, Stigma-Free  
8 International Incorporated; is that right?

9 A. That's correct.

10 Q. And when was this certificate of organization or  
11 incorporation issued?

12 A. August 15th of 2019.

13 Q. And that was, if you look here on page 2, that was the  
14 original filing date of this company; is that right?

15 A. Correct.

16 Q. Okay. I'm directing your attention to page 3. What are  
17 we looking at here on page 3 of Government Exhibit F20?

18 A. It's just another, it's just another sheet from the  
19 Secretary of State. It's got the corporate name,  
20 Stigma-Free International.

21 Q. And this is the, it's the Articles of Incorporation; is  
22 that right?

23 A. Yes, that's right.

24 Q. For a Minnesota nonprofit corporation?

25 A. Correct.

1 Q. And who are listed as the incorporators?

2 A. The incorporators are listed as Jamal Osman, Ilo Amba,  
3 Rachel Ladd and Mohamoud Wardere.

4 Q. And who signed on behalf this?

5 A. Jamal Osman.

6 Q. And Jamal Osman, who is he?

7 A. He's a Minneapolis city council member.

8 Q. He's currently a member of the Minneapolis city council?

9 A. Correct.

10 Q. Was he back in August of 2019 when he incorporated  
11 Stigma-Free International?

12 A. No. He became a council member a year later in August  
13 of 2020.

14 Q. Okay. The address listed here, 3201 Bloomington Avenue  
15 South, Number 2, what kind of building is that? What kind  
16 of address is that?

17 A. It's an apartment or residence.

18 Q. And whose residence is it or was it?

19 A. Jamal Osman.

20 Q. The second incorporator listed is Ilo Amba?

21 A. Correct.

22 Q. Who is that?

23 A. That's Mr. Osman's wife.

24 Q. Okay. Now, Inspector Western, you earlier described  
25 Stigma-Free International as a shell company.

1 A. Correct.

2 Q. What did you mean by that?

3 A. They had nothing. It had no generally accepted business  
4 expenses or revenues or something. It just, it sat there  
5 with an initial balance, and then like I mentioned earlier,  
6 the only -- nothing else went into it money-wise, and the  
7 only thing that came out of it was a monthly banking fee  
8 charge. Five bucks.

9 Q. It had no operations?

10 A. Correct.

11 Q. Okay. The company was created by Jamal Osman on  
12 August 15th of 2019; is that right?

13 A. Yes.

14 Q. Did he then open a bank account on behalf of the new  
15 company, the new entity?

16 A. Yes.

17 Q. I'm going to show you has been marked but not yet  
18 admitted as Government Exhibit W11.

19 It's in evidence, I guess.

20 THE COURT: It is.

21 BY MR. THOMPSON:

22 Q. All right. Inspector, I'm showing you page 1 of  
23 Government Exhibit W11. What are we looking at here?

24 A. The signature card for the bank account.

25 Q. And for those who don't know, what's a signature card?

1 A. It's all the pertinent information from the, the name of  
2 the company, the individual who opens that account.

3 Q. Okay. And the account title here is?

4 A. Stigma-Free International Inc.

5 Q. Okay. The address listed?

6 A. 3201 Bloomington Avenue South, Number 2.

7 Q. And remind us again whose address is that?

8 A. Mr. Osman's.

9 Q. Okay. The type of account or type of business listed?

10 A. Nonprofit.

11 Q. And the account holder?

12 A. Jamal Osman.

13 Q. And what was the date on which Mr. Osman opened this  
14 account?

15 A. November 22nd of 2019.

16 Q. And who is the signatory on the account?

17 A. Jamal Osman.

18 Q. Are there any other signatories on the account back when  
19 he opened it in November of 2019?

20 A. No.

21 Q. And for those who aren't familiar, let's just make it  
22 clear. What does it mean to be the signatory on a bank  
23 account?

24 A. It means you control the account.

25 Q. Okay. All right. I'm going to direct your attention

1 ahead a few pages.

2 Page 8 is, I believe, the first statement of this  
3 account; is that right?

4 A. That's correct.

5 Q. For the month of?

6 A. November.

7 Q. The last week of November 2019; is that correct?

8 A. That's correct.

9 Q. When the account was opened?

10 A. Yes.

11 Q. And directing your attention to the bottom of that page,  
12 can you talk to us about the activity that was in the  
13 account at that first month it was opened in November of  
14 2019?

15 A. Correct.

16 Q. What do we see here?

17 A. An initial deposit via transfer.

18 Q. How much was that initial deposit into the account?

19 A. A hundred dollars.

20 Q. That was to open the account?

21 A. Yes.

22 Q. Was there any other activity that month?

23 A. No.

24 Q. And page 9, that's the statement for, 9 and 10 are the  
25 statement for December 2019; is that right?

1 A. That's right.

2 Q. Was there any activity in the Stigma-Free International  
3 account in December of 2019?

4 A. No.

5 Q. Directing your attention to page 12 of Government  
6 Exhibit W11, was there any economic or is there any activity  
7 in the account in January of 2020?

8 A. The only, the only activity was a \$5 withdrawal for an  
9 analysis service charge.

10 Q. That's, is that a fee from the bank?

11 A. It looks like it.

12 Q. Page 13 of Government Exhibit W11 is the statement for  
13 February 2020, correct?

14 A. Correct.

15 Q. Was there any activity in the Stigma-Free International  
16 account in February of 2020?

17 A. Just, again, one analysis service charge for \$5,  
18 withdrawal.

19 Q. Page 15 is the statement for March of 2020?

20 A. Yes.

21 Q. Again, what if any activity was there in the Stigma-Free  
22 International account in March of 2020?

23 A. Again, that same \$5 analysis service charge.

24 Q. Page 17, April 2020, was there any activity that month?

25 A. Only the analysis service charge for \$5 withdrawal.

1 Q. May of 2020, is that page 18 of W11? Any activity  
2 beyond that \$5 service fee?

3 A. No other activity.

4 Q. Page 19 of W11 is the June 2020 account statement?

5 A. Correct.

6 Q. Is there any activity in the Stigma-Free International  
7 account in June of 2020, other than that \$5 service fee?

8 A. No other activity.

9 Q. Page 20 is the July 2020 account, account statement?

10 A. Correct.

11 Q. Any activity beyond the \$5 service fee?

12 A. None.

13 Q. Page 21 is the August 2020 account statement?

14 A. Correct.

15 Q. Any activity in the account?

16 A. Just \$5 withdrawal for the analysis service charge.

17 Q. Page 23 is the September 2020 statement; is that right?

18 A. Correct.

19 Q. Is there any activity in the account that month?

20 A. Just the one \$5 withdrawal for the analysis service  
21 charge.

22 Q. Okay. And that brings us to October of 2020; is that  
23 right?

24 Now, Inspector, you said that this company was  
25 acquired by the Safari Restaurant group; is that right?

1 A. Yes.

2 Q. How did that happen?

3 A. An individual named Abdi Nur Salah took over with -- got  
4 the folks to resign, Jamal Osman and the other board of  
5 directors, and got a new board of directors.

6 Q. And when did that happen, Inspector Western?

7 A. That was early October 2020.

8 Q. All right. I'm going to show you a series of emails in  
9 which this occurs; is that correct?

10 A. Yes.

11 Q. Okay. First I'm going to show you what's been marked  
12 but not yet admitted as Government Exhibit F21. Inspector  
13 Western, is this one of the emails between Jamal Osman and  
14 Abdi Nur Salah?

15 A. Correct.

16 Q. Dated October 7, 2020?

17 A. Yes.

18 MR. THOMPSON: Your Honor, I move to admit  
19 Government Exhibit F21.

20 THE COURT: Any objection?

21 MR. UDOIBOK: Objection. Hearsay.

22 MR. COLICH: No objection, Your Honor.

23 THE COURT: F21 is admitted.

24 The objection is overruled.

25 MR. THOMPSON: Permission to publish?

1 THE COURT: Yes.

2 BY MR. THOMPSON:

3 Q. All right. Inspector Western, I'm showing you on the  
4 screen Government Exhibit F21. Let's start with the email.  
5 Who is it from?

6 A. Jamal Osman.

7 Q. And who is it sent to?

8 A. Abdi Salah.

9 Q. And then what's the date on this?

10 A. October 7th, 2020.

11 Q. Okay. Inspector, earlier you testified that Jamal Osman  
12 at some point was elected to the Minneapolis city council?

13 A. Correct.

14 Q. When did that happen?

15 A. That happened in August of 2020.

16 Q. So about six or eight weeks before this email?

17 A. Yes.

18 Q. Okay. And Mr. Osman, who does he send this email to on  
19 October 7, 2020?

20 A. Abdi Salah.

21 Q. Who is Abdi Salah?

22 A. Abdi Salah is, he, at the time he was a senior policy  
23 adviser to Mayor Jacob Frye.

24 Q. And Jacob Frye is the mayor of which city?

25 A. Minneapolis.

1 Q. Okay. And Abdi Salah, does he have a connection to  
2 Safari Restaurant?

3 A. Yes. His brother, Abdulkadir Salah, is a partner in  
4 Safari Restaurant.

5 Q. One of the owners of Safari Restaurant?

6 A. Correct.

7 Q. Co-owner with Salim Said?

8 A. That's correct.

9 Q. Okay. The subject line of this email, Nonprofit SFI?

10 A. Yeah.

11 Q. Presumably Stigma-Free International?

12 A. Correct.

13 Q. And it says, "See attachment for all docs." What kind  
14 of documents are attached to this email?

15 A. It looks like all the pertinent documents related to the  
16 structure of a company, Secretary of State docs. Looks like  
17 banking information, probably some IRS stuff with the  
18 employee ID there.

19 Q. Let's page through here. On page 2 of Government  
20 Exhibit F21, there's a corporate banking resolution for  
21 Stigma-Free International; is that right?

22 A. Yes.

23 Q. And it talks about it being in the best interest of the  
24 company to open a business checking account; is that right?

25 A. Correct.

- 1 Q. Unsigned?
- 2 A. Unsigned.
- 3 Q. Page 4, there's unsigned corporate meeting minutes?
- 4 A. Correct.
- 5 Q. Page 5, this is some IRS information?
- 6 A. Yes.
- 7 Q. What's on page 6 here?
- 8 A. Minutes of the initial board of directors meeting for
- 9 Stigma-Free International.
- 10 Q. Uncompleted?
- 11 A. Yes, blank.
- 12 Q. And then starting at page 10, there's the corporate
- 13 bylaws of Stigma-Free International?
- 14 A. Correct.
- 15 Q. And then at page 23, there's an IRS document; is that
- 16 right?
- 17 A. Yes.
- 18 Q. What's the IRS document here?
- 19 A. It looks like the document where they assign them an
- 20 employee identification number.
- 21 Q. Okay.
- 22 A. And they grant them 501c3 authority.
- 23 Q. What does 501c3 mean?
- 24 A. A charity.
- 25 Q. Okay. Nonprofit?

1 A. Nonprofit.

2 Q. Okay. And then here's, I'm starting at page 27 of  
3 Government Exhibit F21. There's the application to be  
4 recognized as a 501c3 nonprofit; is that right?

5 A. Correct.

6 Q. For Stigma-Free International?

7 A. Yes.

8 Q. Okay. Now, after Jamal Osman sent this to Abdi Salah on  
9 October 7th, what did he do with it?

10 A. Pardon me?

11 Q. What did Abdi Salah do with those documents once he  
12 received them?

13 A. He used them, and he was going to change the board of  
14 directors and assign a new chairman and change the bank  
15 account as well.

16 Q. Okay. I'm going to show you what's been marked but not  
17 yet admitted as Government Exhibit F22.

18 Do you recognize Government Exhibit F22?

19 A. Yes.

20 Q. And is this a series of emails or emails where that,  
21 those corporate documents for Stigma-Free International were  
22 forwarded along?

23 A. Correct.

24 MR. THOMPSON: Your Honor, I move to admit  
25 Government Exhibit F22.

1 THE COURT: Any objection?

2 MR. UDOIBOK: No objection.

3 MR. COLICH: No objection.

4 THE COURT: F22 is admitted and may be published.

5 MR. THOMPSON: Thank you, Your Honor.

6 BY MR. THOMPSON:

7 Q. All right. Inspector, we'll start at the bottom because  
8 this is an email that was forwarded; is that right? It's a  
9 chain.

10 A. Yes.

11 Q. First off at the bottom of Government Exhibit F22, is  
12 that the email we were just looking at?

13 A. Yes.

14 Q. From Jamal Osman to Abdi Salah?

15 A. Correct.

16 Q. And then that was sent at -- when was that sent?

17 A. October 7th, 2020, at 12:26 p.m.

18 Q. Okay. And moving up, it looks like Abdi Salah then  
19 forwards those documents shortly thereafter; is that right?

20 A. Yes. At 12:37 p.m. the same day.

21 Q. About 11 minutes later?

22 A. Yeah.

23 Q. Who does he forward them to?

24 A. He forwards them to an attorney named, I think it's  
25 Keillen, I think it's Keillen Curtis.

1 Q. Okay. And he copies someone on the email; is that  
2 right?

3 A. Yes. His brother.

4 Q. Abdulkadir Salah?

5 A. Correct.

6 Q. The owner and partner in Safari Restaurant?

7 A. Yes.

8 Q. Okay. In the body of the email, Abdi Salah says,  
9 "Greetings. Per Abdulkadir's conversation, we want to  
10 dissolve members and completely transfer to new members and  
11 have this entity ready to go ASAP."

12 Is that right?

13 A. Correct.

14 Q. So Abdulkadir, do you think that's Abdulkadir Salah who  
15 is copied on the email?

16 A. Yes.

17 Q. Says, "We want to transfer members and completely  
18 transfer to new members and have this entity ready to go  
19 ASAP."

20 A. Yes.

21 Q. What entity is he referring to?

22 A. Stigma-Free International.

23 Q. And then Abdi Salah asks, "Tell us what we need to  
24 transfer. The entity already has a bank account with U.S.  
25 Bank. Current organizer is willing to transfer it."

1                   Is that right?

2           A.    Correct.

3           Q.    And who is the current organizer of Stigma-Free  
4           International?

5           A.    Jamal Osman.

6           Q.    And then he lists the new board members for Stigma-Free  
7           International; is that right?

8           A.    Correct.

9           Q.    Who are the three board members?

10          A.    Omar Hassan, Ahmed Artan and Abdularizak Moalin.

11          Q.    About 30 minutes later Abdi Salah forwards that email;  
12          is that right?

13          A.    Correct.

14          Q.    Who does he send it to?

15          A.    Sends it to an individual named Abdikadir Mohamud.

16          Q.    And who is Abdikadir Mohamud?

17          A.    Abdikadir Mohamud is an individual who ended up running  
18          the Willmar Stigma-Free food site.

19          Q.    Okay.  And to be clear, is he one of the defendants in  
20          this case?

21          A.    Correct.

22          Q.    He's not in trial today?

23          A.    No.  That's correct.

24          Q.    Abdi Salah, is he one of the defendants in this case?

25          A.    Yes.

1 Q. And is he, he's not in trial today in this trial,  
2 correct?

3 A. Correct.

4 Q. How about Abdulkadir Salah, his brother?

5 A. The same.

6 Q. Another defendant in this case?

7 A. Correct.

8 Q. Okay. How about Ahmed Artan listed as one of the board  
9 members?

10 A. He's another individual involved.

11 Q. Is he charged in this case as well?

12 A. Correct.

13 Q. This isn't his trial though?

14 A. That's right.

15 Q. Okay. All right. So these emails are sent in the  
16 afternoon of October 7th --

17 A. Yes.

18 Q. -- correct? Okay. I'd like to show you a series of  
19 additional emails that are not yet in evidence. Okay,  
20 Inspector?

21 A. Yes.

22 Q. F24, F25, F26, and F27. Do you see those?

23 A. I do.

24 Q. Are those additional emails that Abdi Salah sent  
25 relating to Stigma-Free International on October 7th, 2020?

1 A. Yes.

2 MR. THOMPSON: Your Honor, I move to admit  
3 Exhibits F24, F25, F26 and F27.

4 THE COURT: Any objection?

5 MR. UDOIBOK: Objection. Hearsay.

6 THE COURT: Mr. Colich?

7 MR. COLICH: No objection.

8 THE COURT: Mr. Thompson, are these conditionally  
9 admitted as coconspirator, or do you have another exception?

10 MR. THOMPSON: Coconspirator statements, Your  
11 Honor.

12 THE COURT: Okay. Those in the last couple are  
13 going to be tracked as conditionally admitted under the  
14 coconspirator statement. F24, 25, 26 and 27 are  
15 conditionally admitted.

16 MR. THOMPSON: Your Honor, I'd offer also they are  
17 also separately admissible as nonhearsay because they are  
18 not offered for the truth of the matter asserted, I don't  
19 think, but I think conditional is fine.

20 THE COURT: That's fair, but we will track them  
21 anyway.

22 MR. THOMPSON: Thank you.

23 THE COURT: Thank you.

24 MR. THOMPSON: Permission to publish, Your Honor?

25 THE COURT: Yes.

1 BY MR. THOMPSON:

2 Q. All right. Inspector, do you see up on your screen  
3 Government Exhibit F24?

4 A. Yes.

5 Q. It looks like the jurors do too, I think, or else  
6 they're staring expectantly at their screens.

7 Okay. Let's start with F24. Inspector Western,  
8 could you just describe this email for the record, please.

9 A. Yeah. It's an email from Abdi Salah to Ahmed Artan,  
10 subject: Jamal Resignation. It's dated October 7th, 2020.

11 Q. And what time did Abdi Salah send this email to Ahmed  
12 Artan?

13 A. 3:21.

14 Q. Just a few hours, this all takes place in the course of  
15 a few hours; is that correct?

16 A. Yes.

17 Q. Okay. And page 2, there's an attachment to this; is  
18 that right?

19 A. Correct.

20 Q. What's the attachment titled?

21 A. Jamal Resignation.

22 Q. And then directing your attention to page 2, which is  
23 that attachment; is that right?

24 A. Yes.

25 Q. All right. Could you read it for us?

1 A. Yes.

2 "Dear President Artan and board members.

3 "It is with regret that I need to inform you about  
4 my decision to resign from my role as president for the  
5 Stigma-Free International Inc.

6 "My family commitments and work schedule have made  
7 it impossible to give the board the time it requires to be  
8 truly effective in my position. I have seen growth during  
9 the time that I have served and am confident you will  
10 continue to grow this amazing organization in my absence.

11 "Thank you for giving me the chance to work with  
12 such a great team. I look forward to hearing about the  
13 continued successes of the Stigma-Free International Inc.

14 "Sincerely, Jamal Osman."

15 Q. Inspector Western, this letter talks about seeing growth  
16 during the time that he has served.

17 Was there any growth in Stigma-Free International  
18 that you saw during your investigation of this entity?

19 A. Certainly not in the bank account, no.

20 Q. Was there any employees that you are aware of?

21 A. No.

22 Q. Okay. Government Exhibit F25 is another letter sent to  
23 that, essentially same time, is that correct, 3:25 p.m. on  
24 October 7th?

25 A. That's correct.

1 Q. Who is it sent from?

2 A. Abdi Salah to Ahmed Artan, subject: Ilo Resignation  
3 Letter.

4 Q. Okay. And on page 2, is that a resignation letter from  
5 Ilo Amba?

6 A. Correct.

7 Q. And does it list her title purportedly at Stigma-Free  
8 International?

9 A. Yes. Yes, chief financial officer.

10 Q. And again, remind the jury who Ilo Amba is?

11 A. That's the wife of Mr. Osman.

12 Q. The letter itself, other than referring to Ms. Amba by  
13 name and her role as chief financial officer, how does it  
14 compare to the one that's -- the resignation letter of Jamal  
15 Osman?

16 A. That's a copy.

17 Q. Same language?

18 A. Same language, yeah.

19 Q. Okay. And I'm showing you now what's been admitted as  
20 Government Exhibit F26. It looks like about a minute later  
21 on 3:27, and on October 7th Abdi Salah sent another  
22 resignation letter to Ahmed Artan; is that right?

23 A. Correct.

24 Q. And whose name is on this resignation letter?

25 A. Mohamoud Wardere.

1 Q. And what title is listed in the letter from Mr. Wardere?

2 A. It lists his role as the chair.

3 Q. Other than the name and the title, how does it compare  
4 to the letters from Jamal Osman and Ilo Amba?

5 A. Same language.

6 Q. Government Exhibit F27, 3:31 p.m. on October 7th from  
7 Abdi Salah, what does he send?

8 A. Yeah, Mohamed's resignation.

9 Q. And can you just briefly describe the attached  
10 resignation letter?

11 A. Yeah, it's coming from Mohamed Hassan. He lists himself  
12 as a member of the board of trustee.

13 Q. For Stigma-Free International?

14 A. Yes.

15 Q. Other than the name and title, how does it compare to  
16 the other resignation letters?

17 A. Same language.

18 Q. Again, referring to the growth in his time at  
19 Stigma-Free International?

20 A. Yep.

21 Q. And directing your attention to the first page of  
22 Government Exhibit F27. When does Abdi Salah send this last  
23 resignation letter to Ahmed Artan? What time on  
24 October 7th?

25 A. 3:31.

1 Q. p.m.?

2 A. Yeah.

3 Q. 15:31, that's military time; is that right?

4 A. Correct.

5 Q. Okay. I'd like to show you Ahmed Artan's response to  
6 this email or sends an email in response shortly thereafter;  
7 is that right?

8 A. Correct.

9 Q. I'd like to show you what's been marked but not yet  
10 admitted as F28. Is this that email?

11 A. Yes.

12 MR. THOMPSON: Your Honor, I move to admit  
13 Government Exhibit F28.

14 THE COURT: Any objection?

15 MR. UDOIBOK: Same.

16 MR. COLICH: No objection.

17 THE COURT: F28 is admitted.

18 MR. THOMPSON: Permission to publish?

19 THE COURT: Yes.

20 BY MR. THOMPSON:

21 Q. Okay. Inspector Western, when -- well, describe this  
22 email for us here.

23 A. It's an email from Ahmed Artan to Abdi Salah. Subject  
24 is: Resignation Letter Signed, dated October 7th, 2020, at  
25 3:48 p.m.

1 Q. So how does that compare to when Abdi Salah had  
2 originally sent him these letters?

3 A. Shortly after.

4 Q. And attached, there's a series of attachments; is that  
5 right?

6 A. Yeah.

7 Q. And what are --

8 A. The resignations.

9 Q. Okay.

10 A. With signature.

11 Q. We'll start with page 5 here. What's the, on page 5 of  
12 Government Exhibit F28?

13 A. That's the resignation with signature of Jamal Osman.

14 Q. It looks like -- how would you describe this signature?

15 A. It looks like one you would do on a PDF, Adobe or  
16 something.

17 Q. Like an e-signature?

18 A. Yeah.

19 Q. Doesn't appear to be --

20 A. Doesn't appear to be handwritten.

21 Q. Okay. And on page 4, is there one for Ilo Amba?

22 A. Yes.

23 Q. How would you describe that signature?

24 A. Same thing.

25 Q. And there's one for each of the others; is that correct?

1 A. That's correct.

2 Q. Page 3 is Mohamed Hassan?

3 A. Yes.

4 Q. Page 6, whose resignation letter there?

5 A. Mohamoud Wardere.

6 Q. Okay. I'd like to --

7 We can stop whenever you want, Your Honor.

8 THE COURT: Let's go ahead and take our morning  
9 break.

10 MR. THOMPSON: Thank you.

11 THE COURT: We will return at 10:45.

12 All rise for the jury.

13 10:29 a.m.

14 **IN OPEN COURT**

15 **(JURY NOT PRESENT)**

16 THE COURT: All right. 10:45 everyone. We are in  
17 recess.

18 (Recess taken at 10:29 a.m. till 10:47 a.m.)

19 10:47 a.m.

20 **IN OPEN COURT**

21 **(JURY PRESENT)**

22 THE COURT: You may all be seated.

23 Mr. Thompson, you may continue.

24 MR. THOMPSON: Thank you, Your Honor.

25

1 BY MR. THOMPSON:

2 Q. Welcome back, Inspector. Before the break we were  
3 talking about these resignation letters from Jamal Osman and  
4 the other board members of Stigma-Free International?

5 A. Correct.

6 Q. From October 7th of 2020; is that right?

7 A. Yes.

8 Q. And we were looking at Government Exhibit F28, which was  
9 an email from Ahmed Artan, one of the defendants in this  
10 case, to another defendant in this case, Abdi Salah; is that  
11 right?

12 A. Correct.

13 Q. The brother of Abdulkadir Salah, Salim Said's partner in  
14 Safari Restaurant, correct?

15 A. That's correct.

16 Q. Okay. And he sent these signed e-signature resignation  
17 letters at 3:48 p.m. on October 7th; is that right?

18 A. Yes.

19 Q. Okay. Did Mr. Artan send an additional document related  
20 to Stigma-Free International later that day on October 7th,  
21 2020?

22 A. Yes.

23 Q. I'd like to show you what's been marked but not yet  
24 admitted as Government Exhibit F29. And is this that email  
25 from Ahmed Artan to Abdi Salah?

1 A. Yes.

2 MR. THOMPSON: Your Honor, I move to admit  
3 Government Exhibit F29.

4 THE COURT: Any objection?

5 MR. UDOIBOK: No objection.

6 MR. COLICH: No objection.

7 THE COURT: F29 is admitted.

8 BY MR. THOMPSON:

9 Q. All right. Inspector, could you just take us through  
10 the basics of this exhibit for the record?

11 A. Yeah. It's an email from Ahmed Artan to Abdi Salah.  
12 Subject line is: Corrected Minute. The date and time is  
13 October 7th, 2020, at 10:34 p.m.

14 Q. So later that evening?

15 A. Yes.

16 Q. And there's an attachment; is that right?

17 A. Yes.

18 Q. What's the title of the attachment?

19 A. Updated Minutes.

20 Q. And the attachment starts at page 2 of Government  
21 Exhibit F29; is that right?

22 A. That's right.

23 Q. Okay. What's the title of this document?

24 A. Minutes of Board of Directors Meeting for Stigma-Free  
25 International Inc.

1 Q. And it purports to document a board meeting; is that  
2 right?

3 A. Yes.

4 Q. Where was that board meeting held according to the  
5 minutes?

6 A. 778 Berry Street in St. Paul Minnesota.

7 Q. On what day?

8 A. Oh. October 7, 2020.

9 Q. Same day?

10 A. Yes.

11 Q. Okay. That address 778 Berry Street in St. Paul,  
12 Minnesota, what kind of address is that? What kind of  
13 building?

14 A. That's a residence.

15 Q. Do you know whose residence it was?

16 A. Yes.

17 Q. Whose?

18 A. Ahmed Artan.

19 Q. Ahmed Artan?

20 A. Right.

21 Q. And according to the board minutes, who attended the  
22 board meeting on October 7th, 2020?

23 A. All the previous board of directors, Jamal Osman, Ilo  
24 Amba, Mohamoud Wardere, Hakim Dalmar and Mohamed Hassan.

25 Q. All right. And there's a board resolution about the

1 officers of the corporation; is that right?

2 A. Yes.

3 Q. And does it, in this board meeting do they, do the  
4 minutes purport to reflect that there was an election of new  
5 officers of Stigma-Free International at this board meeting  
6 on October 7th of 2020?

7 A. Yes.

8 Q. Who were the new board members?

9 A. Ahmed Artan, president. Omar Hassan, vice president,  
10 Abdularizak Moalin as secretary.

11 Q. Okay. And there's another resolution in these minutes;  
12 is that right?

13 A. Yes.

14 Q. What does it say?

15 A. "Resolved that the president shall and has the authority  
16 to open a corporate bank account and to conduct any and all  
17 the affairs of the corporation, including but not limited to  
18 purchasing and selling property, making and obtaining loans,  
19 and entering into contracts. All actions of the president  
20 will be made in the best interests of the corporation."

21 Q. And remind us again who is the new president of  
22 Stigma-Free International?

23 A. Ahmed Artan.

24 Q. And on page 4 of Government Exhibit F29, what appears at  
25 the bottom of these board minutes?

1 A. Signatures.

2 Q. Of the prior board members?

3 A. Correct.

4 Q. And how would you describe the signatures on these board  
5 minutes?

6 A. They look very similar to the ones on the resignation  
7 letters, and they look like they're digital.

8 Q. E-signatures?

9 A. E-signatures, correct. Sorry.

10 Q. Okay. One of the resolutions you talked about was the  
11 authority to open a bank account; is that right?

12 A. Yes.

13 Q. In the wake of October 7th and the installation of Ahmed  
14 Artan as the new president of Stigma-Free International, did  
15 he take any steps with respect to the Stigma-Free  
16 International bank account?

17 A. Yeah. He took over as signatory of that account, of  
18 their bank account.

19 Q. And is that the bank account that we looked at earlier?

20 A. Correct.

21 Q. Okay. I'm going to direct your attention back to  
22 Government Exhibit W11. And again that's the original  
23 signature card for this account that was opened by Jamal  
24 Osman in November of 2019; is that correct?

25 A. That's correct.

1 Q. And we went over before there was no activity in the  
2 account, correct?

3 A. Correct.

4 Q. Directing your attention to page 4 of Government  
5 Exhibit W11, there's a document that's titled Business  
6 Signature Card Addendum Add Signer?

7 A. That is correct.

8 Q. What is this document, Inspector Western?

9 A. That is -- they're turning over the signatory  
10 responsibility to Ahmed Artan or adding him at this point.

11 Q. As a new signatory on the account?

12 A. Correct.

13 Q. That gives him access to the account?

14 A. Yes.

15 Q. And when did this happen? When was Ahmed Artan added as  
16 a signatory on the Stigma-Free International account at  
17 U.S. Bank?

18 A. October 8th, 2020.

19 Q. And who signed this document to add his name as a  
20 signatory?

21 A. It was e-signed by Jamal Osman and Ahmed Artan.

22 Q. On what date and time?

23 A. October 8th, 2020, 9:30 a.m.

24 Q. The next morning?

25 A. Yes.

1 Q. And then that same day at 9:35 a.m., there's another  
2 thing that happened, removed a signer from the account; is  
3 that right?

4 A. Correct.

5 Q. This is on page 7 of Government Exhibit W11?

6 A. Yes.

7 Q. Could you describe what happened?

8 A. That is Jamal Osman being removed as a signatory on this  
9 account. And it's e-signed by the new president, Ahmed  
10 Artan.

11 Q. And when did Ahmed Artan sign to remove Jamal Osman as a  
12 signatory on the Stigma-Free International account?

13 A. October 8th, 2020, 9:35, about five minutes after the  
14 previous.

15 Q. That's the day after he --

16 A. Yep.

17 Q. -- received those corporate documents from Jamal  
18 Osman --

19 A. Correct.

20 Q. -- the next morning?

21 A. Yes.

22 Q. Okay. Inspector, you mentioned before that prior to  
23 October 2020 there wasn't much activity in the account; is  
24 that right?

25 A. That's right.

1 Q. Could you remind us?

2 A. Yes.

3 Q. What was there?

4 A. There was initial deposit and monthly \$5 fee from the  
5 bank.

6 Q. Initial deposit of \$100?

7 A. Yes.

8 Q. Okay. I'm going to skip forward. Did you look to see  
9 what, if any, activity occurred in the account after  
10 October 2020?

11 A. Yes.

12 Q. All right. Let's rather than quiz your memory, why  
13 don't we walk through it here. Okay?

14 A. Thank you.

15 Q. Page 25 of Government Exhibit W11 is the Stigma-Free  
16 International account statement for October 2020; is that  
17 right?

18 A. Yes.

19 Q. That's the month that Ahmed Artan took over as the  
20 president of Stigma-Free International?

21 A. Correct.

22 Q. And the signatory on the account?

23 A. Yes.

24 Q. Okay. There is a new address listed for Stigma-Free  
25 International; is that right?

1 A. Correct.

2 Q. What's the address on the account?

3 A. 2517 Golden Valley Road, Apartment 204.

4 Q. Are you familiar with that address?

5 A. Yes. It's a multi-unit residence.

6 Q. And who lived in Apartment 204?

7 A. Ahmed Artan.

8 Q. Okay. It wasn't a business office?

9 A. No.

10 Q. As far as you know, has there ever been a business  
11 office associated with this entity?

12 A. No.

13 Q. What, if any, economic activity occurred in the  
14 Stigma-Free International account in October 2020?

15 A. Only that \$5 withdrawal for analysis service charge.

16 Q. Was there any food purchased?

17 A. No.

18 Q. Any payroll?

19 A. No.

20 Q. Directing your attention to page 27 and 28. We have the  
21 account statement for November 2020 for Stigma-Free  
22 International?

23 A. Yes.

24 Q. What, if any, economic activity happened in the account  
25 that month?

1 A. There's a \$5 analysis service charge, and then there's  
2 also a \$35 mobile banking transfer to a separate account.

3 Q. Okay. What was the ending balance in the Stigma-Free  
4 International account as of November 30th, 2020?

5 A. \$10.

6 Q. Directing your attention to page 30, we have the  
7 statement for the Stigma-Free International account in  
8 December 2020?

9 A. Correct.

10 Q. What activity was there in the account in December 2020?

11 A. Just a \$5 withdrawal for the analysis service charge.

12 Q. Was there any other activity in the account?

13 A. No.

14 Q. Any deposits?

15 A. No.

16 Q. Any purchases?

17 A. No.

18 Q. Food purchases?

19 A. No.

20 Q. Any payroll?

21 A. No.

22 Q. All right. Now directing your attention to page 31 and  
23 32 of Government Exhibit W11, this is the account statement  
24 for January 2021; is that right?

25 A. Correct.

1 Q. What happened to the Stigma-Free International bank  
2 account in January of 2021?

3 A. Had some major deposits.

4 Q. How much was deposited into the account in January of  
5 2021?

6 A. \$1,560,028.72.

7 Q. Inspector Western, where did that \$1,560,028.72 come  
8 from?

9 A. It was from Feeding Our Future, checks.

10 Q. All right. And I'm going to direct your attention here  
11 to Government Exhibit, or sorry, page 36 of this exhibit is,  
12 is that one of the checks that was deposited into the  
13 account?

14 A. Correct.

15 Q. In January of 2021?

16 A. Yes.

17 Q. Could you describe this first check deposited into the  
18 Stigma-Free International account in, on January 14th or  
19 15th of 2021?

20 A. Yeah. It's paid to the order of Stigma-Free  
21 International from Feeding Our Future check stock. The  
22 amount is \$425,209.92.

23 Q. Had there been any -- and who signed the check on behalf  
24 of Feeding Our Future?

25 A. Appears to be Aimee Bock.

1 Q. Had there been any -- other than that initial \$100  
2 deposit in November of 2019, had there been any activity in  
3 the account by way of deposit prior to January of 2021?

4 A. None.

5 Q. Page 38 of Government Exhibit W11 that's another check  
6 deposited into the Stigma-Free International account on  
7 January 15th of 2021?

8 A. Correct.

9 Q. How much was this check for?

10 A. \$425,488.16.

11 Q. Who was the check from?

12 A. Feeding Our Future.

13 Q. Who signed it?

14 A. Aimee Bock.

15 Q. Almost the same amount as the last check but a different  
16 check; is that correct?

17 A. Correct.

18 Q. Directing your attention to page 40 of Government  
19 Exhibit W11. What do we see here?

20 A. Another check from Feeding Our Future to Stigma-Free  
21 International. This one is in the amount of \$354,874.40.

22 Q. From Feeding Our Future?

23 A. Correct.

24 Q. Who signed the check on behalf of Feeding Our Future?

25 A. Aimee Bock.

1 Q. Page 42 of Government Exhibit W11, is there another  
2 check deposited into the Stigma-Free International account  
3 in January of 2021?

4 A. Yes.

5 Q. What's the amount of this check?

6 A. This check is \$354,456.24.

7 Q. Who is the check from?

8 A. Feeding Our Future.

9 Q. Who signed, whose signature appears on the check on  
10 behalf of Feeding Our Future?

11 A. Aimee Bock.

12 Q. All right. Inspector Western, that's a lot of money.

13 A. Yeah.

14 Q. After acquiring Stigma-Free International on  
15 October 7th, 2020, from Jamal Osman, how was the company  
16 used?

17 A. It was used to start meal sites.

18 Q. And why was, was there something significant about  
19 Stigma-Free International being used to open up meal sites  
20 in October 2020?

21 A. Yeah, because as I mentioned earlier, they had the  
22 changes instituted where you had to be a nonprofit, and  
23 Stigma-Free was a nonprofit.

24 Q. How many sites were opened on behalf or in the name of  
25 Stigma-Free International, how many food sites?

1 A. I believe five.

2 Q. Where were those sites located?

3 A. Willmar, Minnesota; Mankato, Minnesota; Waite Park,  
4 Minnesota; St. Cloud, Minnesota; and St. Paul, Minnesota.

5 Q. The first two sites, where were they opened? When were  
6 they opened?

7 A. When?

8 Q. When. When and where.

9 A. Willmar, Minnesota, October 2020. And Mankato,  
10 Minnesota, October 2020.

11 Q. How soon after the company was created or acquired?

12 A. Within a few days.

13 Q. Okay. And, Inspector Western, you are here to talk  
14 about those two sites here today; is that right?

15 A. Correct.

16 Q. Not the others?

17 A. Yes.

18 Q. Stigma-Free, Willmar and Stigma-Free, Mankato?

19 A. Yes.

20 Q. Okay. So let's start with the Stigma-Free, Willmar  
21 site. Okay?

22 A. Okay.

23 Q. Okay. I'm going to show you what's been marked but not  
24 yet admitted as Government Exhibit G3.

25 Do you recognize Government Exhibit G3?

1 A. I do.

2 Q. Is this the application, the site application for the  
3 Stigma-Free International, Willmar site?

4 A. Yes.

5 MR. THOMPSON: Your Honor, I'd move to admit  
6 Government Exhibit G3.

7 THE COURT: Any objection?

8 MR. UDOIBOK: No objection.

9 MR. COLICH: No objection, Your Honor.

10 THE COURT: G3 is admitted and may be published.

11 MR. THOMPSON: Thank you, Your Honor.

12 BY MR. THOMPSON:

13 Q. Inspector Western, do you -- I'm going to direct your  
14 attention to the first page of Government Exhibit G3. This  
15 is an email from Aimee Bock; is that right?

16 A. Correct.

17 Q. To some Minnesota Department of Education employees?

18 A. Yes.

19 Q. What's the subject line?

20 A. Subject line is Site Application, Stigma-Free  
21 International, Willmar.

22 Q. And there's in the body she says, "Please see the  
23 attached site application."

24 Is that right?

25 A. Yes.

1 Q. When was this email sent?

2 A. October 19th, 2020.

3 Q. I direct your attention -- there's some documents  
4 attached; is that correct?

5 A. Yes.

6 Q. Including a site identification request?

7 A. Correct.

8 Q. For Stigma-Free International, Willmar?

9 A. Yes.

10 Q. And there's a, on page 6 of Government Exhibit G3,  
11 there's an agreement; is that right?

12 A. Yes.

13 Q. And that agreement is between which entities here at the  
14 top of page 7?

15 A. Feeding Our Future and Stigma-Free International,  
16 Willmar.

17 Q. What's the date of, the start date for this contract?

18 A. October 10th of 2020.

19 Q. And how, Inspector Western, does that compare to when  
20 Ahmed Artan obtained Stigma-Free International?

21 A. Just days after.

22 Q. Directing your attention to page 11 of Government  
23 Exhibit G3, who signed this agreement on behalf of both  
24 Stigma-Free International and Aimee Bock or Feeding Our  
25 Future? Sorry.

1 A. Ahmed Artan signed it on behalf of Stigma-Free, and  
2 Aimee Bock signed it on behalf of Feeding Our Future.

3 Q. And Aimee Bock signed on October 10th, 2020?

4 A. Correct.

5 Q. When did Mr. Artan sign it?

6 A. The 9th of October, 2020.

7 Q. Okay. And it looks like there was a preoperational  
8 visit to the new site, according to this document at  
9 page 12; is that right?

10 A. That's right.

11 Q. And who signed -- under the approval, when did it say  
12 the plan start date is?

13 A. October 10th, 2020.

14 Q. And who signed on behalf of the site?

15 A. Ahmed Artan and Aimee Bock.

16 Q. Looking at page 18, there's a Summer Food Service  
17 Program sponsor preoperational site visit form; is that  
18 right?

19 A. Correct.

20 Q. What is the number of meals, estimated number of meals  
21 to be served at the site according to this?

22 A. 500.

23 Q. What is listed as the site capacity?

24 A. 500.

25 Q. What meals were planned to be served according to this

1 document?

2 A. Breakfast and lunch.

3 Q. And who signed as the monitor on page 19?

4 A. Aimee Bock.

5 Q. Agent, I want to show you now what's been marked but not  
6 yet admitted as Government Exhibit G6. Actually before I do  
7 that, I'm going to show you G5 actually. Okay?

8 A. Okay.

9 Q. Before I do, though, Inspector Western, are you familiar  
10 with a vendor?

11 A. Yeah.

12 Q. What's a vendor?

13 A. A vendor is someone or an entity that they contract with  
14 to, a site would contract with to supply food.

15 Q. And did there, was there a vendor agreement or a  
16 catering agreement for the Stigma-Free, Willmar site?

17 A. Yes.

18 Q. What was the name of the purported vendor?

19 A. Tunyar Trading.

20 Q. I'm going to show you now what's been marked but not yet  
21 admitted as Government Exhibit G5.

22 Is this an email containing the catering agreement  
23 between Stigma-Free International and -- for Tunyar Trading?

24 A. Yes.

25 MR. THOMPSON: Your Honor, I would move to admit

1 Government Exhibit G5.

2 THE COURT: Any objection?

3 MR. UDOIBOK: No objection.

4 MR. COLICH: No objection.

5 THE COURT: G5 is admitted.

6 BY MR. THOMPSON:

7 Q. I'm going to start at the bottom of G5 here, Inspector.

8 Could you describe the email at the bottom of page 1,

9 Government Exhibit G5?

10 A. Yeah. It's an email from Abdikadir Mohamud to Abdikerm

11 Eidleh on Monday November 30th, 2020, subject: Catering

12 Agreements for Stigma-Free, Willmar.

13 Q. Okay. Let me start with just identifying the players

14 here. Abdikadir Mohamud, who is that?

15 A. He is the individual that was running Stigma-Free,

16 Willmar, and he's also the, the owner of Tunyar Trading.

17 Q. One of the defendants charged in this case?

18 A. Correct.

19 Q. Not at trial here today?

20 A. That's correct.

21 Q. How about Abdikerm Eidleh?

22 A. Abdikerm Eidleh is a, was an employee of Feeding Our

23 Future.

24 Q. Okay. Defendant in this case?

25 A. Correct.

1 Q. Not currently on trial today?

2 A. Correct.

3 Q. Okay. Okay. And the subject line is: Catering  
4 Agreements for Stigma-Free, Willmar, correct?

5 A. Yes.

6 Q. And then it looks like Mr. Eidleh forwarded that  
7 agreement to Aimee Bock, correct?

8 A. Correct.

9 Q. That same day, November 30th?

10 A. Yes.

11 Q. Page 2, is that a copy of this catering agreement?

12 A. Yes.

13 Q. And who is listed as the sponsor?

14 A. Sponsor is Feeding Our Future.

15 Q. And the vendor?

16 A. Tunyar Trading LLC.

17 Q. Okay. And what does it say here about the vendor?

18 A. "The vendor will provide the approved meal service to  
19 sponsor's sites listed below or on an attached list, up to  
20 the approved maximum number of meals for each approved meal  
21 service. Breakfast, lunch, snack or supplement and supper."

22 Q. Okay. What sites are listed?

23 A. The Willmar site and the Mankato site.

24 Q. Okay. Tunyar Trading is listed as the site name for the  
25 Willmar site; is that right?

1 A. Yes.

2 Q. So these are both the Stigma-Free sites, correct?

3 A. Correct.

4 Q. Okay. And directing your attention to page 9 of  
5 Government Exhibit G5, who signed on behalf, this catering  
6 agreement on behalf of Feeding Our Future?

7 A. Aimee Bock.

8 Q. Who signed on behalf of Tunyar Trading?

9 A. Abdikadir Mohamud.

10 Q. Now, Inspector Western, during the investigation did you  
11 and your colleagues do any, look into Tunyar Trading LLC,  
12 this purported vendor company?

13 A. Yes.

14 Q. What did you do and why?

15 A. The, the accountant subpoenaed their bank records. We  
16 looked up their, we figured out who the owner was through  
17 the Secretary of State.

18 Q. What did you look for with respect to Secretary of State  
19 documents?

20 A. Who the owner was.

21 Q. Okay.

22 A. And when it was opened.

23 Q. Okay. Why did you look for when the company was opened?

24 A. To see if it was opened, like these other ones, right  
25 around the time of the, the change in the program or if it

1 had been around quite a while.

2 Q. Why would that be significant to your investigation?

3 A. Because we noticed that after this change and they went  
4 to nonprofits, all of a sudden these people started  
5 acquiring nonprofits and opening these companies.

6 Q. Okay. I'm going to show you now what's been marked but  
7 not yet admitted as Government Exhibit G1. What is  
8 Government Exhibit G1?

9 A. That's the certificate of organization for Tunyar  
10 Trading LLC.

11 MR. THOMPSON: Your Honor, I move to admit  
12 Government Exhibit G1.

13 THE COURT: Any objection?

14 MR. UDOIBOK: No objection.

15 MR. COLICH: No objection.

16 THE COURT: G1 is admitted.

17 BY MR. THOMPSON:

18 Q. Inspector Western, when you and your colleagues looked  
19 at Tunyar Trading in the Secretary of State records, what  
20 did you find in terms of when Tunyar Trading had been  
21 created?

22 A. It was created three days after that change had been  
23 announced.

24 Q. What change had been announced?

25 A. The change where the food program, you had to be a

1 nonprofit to operate a site.

2 Q. And specifically it was registered on September 28th of  
3 2020?

4 A. Correct.

5 Q. Was that significant to you, Inspector?

6 A. Yeah.

7 Q. Why?

8 A. Because, like these other companies, right after that  
9 change was made where they had to be a nonprofit, all of a  
10 sudden these companies started popping up and doing business  
11 in the food program.

12 Q. What kind of business did they do in the food program?

13 A. Operating sites, submitting meal counts.

14 Q. In terms of revenue?

15 A. Getting paid large amounts.

16 Q. How large?

17 A. 400 some thousand dollars per check.

18 Q. All right. I'm showing you page 2 of Government  
19 Exhibit G1. This is the articles of organization for Tunyar  
20 Trading; is that right?

21 A. Correct.

22 Q. And who is listed as the organizer of Tunyar Trading  
23 LLC?

24 A. Abdikadir Mohamud.

25 Q. And that's one of the defendants in this case?

1 A. Yes.

2 Q. The address that's listed for the entity, 1485 66th  
3 Avenue Northeast in Fridley, Minnesota?

4 A. Yeah.

5 Q. Are you familiar with that address?

6 A. I am.

7 Q. What kind of address is it?

8 A. It's a residence.

9 Q. Whose residence is that?

10 A. Abdikadir Mohamud's.

11 Q. Is there a warehouse there?

12 A. No.

13 Q. What kind of, what kind of a residence, single family  
14 home?

15 A. Yeah.

16 Q. Is there an operational company there?

17 A. No.

18 Q. Employees?

19 A. No.

20 Q. And who signed Abdikadir? Who signed on behalf of the  
21 company?

22 A. Abdikadir Mohamud.

23 Q. Okay. Now, Inspector Western, after Stigma-Free  
24 International or after Ahmed Artan and Aimee Bock enrolled  
25 Stigma-Free International in the food program for a site at

1 Willmar, Minnesota, did they submit meal counts?

2 A. Yes.

3 Q. How would you describe those meal counts?

4 A. Fake, inflated.

5 Q. What were the numbers?

6 A. 3,000 kids a day.

7 Q. Okay. I'm going to show you now Government Exhibit G6,  
8 what's been marked but not yet admitted as Government  
9 Exhibit G6.

10 Is this an email on December 30th, 2020,  
11 containing the first of those meal counts?

12 A. Yes.

13 MR. THOMPSON: Your Honor, I'd move to admit  
14 Government Exhibit G6.

15 THE COURT: Any objection?

16 MR. UDOIBOK: No objection.

17 MR. COLICH: No objection.

18 THE COURT: G6 is admitted.

19 BY MR. THOMPSON:

20 Q. Inspector Western, could you walk us through the basics  
21 of this email at Government Exhibit G6.

22 A. Yeah. It's an email from Abdikadir Mohamud to Abdikerm  
23 Eidleh, the employee at Feeding Our Future. Subject line is  
24 Stigma-Free, Willmar, October/November. And it's sent on  
25 December 30th, 2020.

1 Q. Directing your attention to page 2, what's attached to  
2 this email?

3 A. Meal counts.

4 Q. Okay. And when do those meal counts -- and meal counts  
5 for which site?

6 A. Stigma-Free, Willmar.

7 Q. Starting what day?

8 A. Starting October 19th, 2020.

9 Q. Okay. How does that compare to when Mr. Artan acquired  
10 Stigma-Free International?

11 A. It's just, you know, a week later, a week and a half  
12 later.

13 Q. How -- when does that compare to when they submitted the  
14 enrollment application in the program?

15 A. The enrollment application was submitted the same day.

16 Q. October 19, 2020?

17 A. Correct.

18 Q. So that very first day that they purport to be operating  
19 a site at Stigma-Free, Willmar, how many kids did they  
20 purport, did they claim to be serving at the Stigma-Free,  
21 Willmar site?

22 A. They prepared meals for 2700 and 2,698 purported to be  
23 served.

24 Q. Okay. How about day two?

25 A. 3,000 were purported to be prepared, 2,996 were

1 purported to be served.

2 Q. Day three, Wednesday?

3 A. 3,000 prepared, 2,999 served.

4 Q. And that's, on this first form on page 2, that's serving  
5 breakfast or --

6 A. That's lunch. Lunch.

7 Q. Did they also purport to be serving breakfast as well at  
8 the Stigma-Free, Willmar site?

9 A. Yes.

10 Q. How many breakfasts?

11 A. Day one, Monday, prepared 2700, purported to serve  
12 2,698.

13 Q. Same number?

14 A. Same number.

15 Q. And this goes on day after day?

16 A. Yes.

17 Q. Second week, how many a day?

18 A. They purported to prepare 3,000 and served, purported to  
19 serve just under 3,000.

20 Q. Okay. Now this is in Willmar, Minnesota, correct?

21 A. Correct.

22 Q. Inspector, talk to me here. For those who are not  
23 familiar with Willmar, Minnesota, where is it located?

24 A. It is about 80 miles west of the Twin Cities.

25 Q. Okay. What kind of a town is it? How big is the town?

1 A. About as of 2020 about 21,000 people.

2 Q. 21,000 people live there. The surrounding area, how  
3 would you describe it?

4 A. Mostly rural.

5 Q. How many kids attend -- there's a Willmar Public School  
6 District; is that right?

7 A. Yes.

8 Q. How many kids -- what's the total enrollment of the  
9 Willmar Public School District?

10 A. About 4,000.

11 Q. Inspector, did you do some investigation as to where  
12 this site was actually located in Willmar?

13 A. Yes.

14 Q. Where was it located?

15 A. It was located at 330 Fourth Street, downtown Willmar.

16 Q. Okay. And how would you describe that building?

17 A. It's just a small, little storefront.

18 Q. And how would you describe downtown Willmar?

19 A. Oh, quaint, like an old school downtown you would see in  
20 a movie with like the, you know, small little, like a Main  
21 Street.

22 Q. Okay. Bustling?

23 A. I think it depends on the time. Maybe I wouldn't call  
24 it a metropolis.

25 Q. Bustling in the 1920s?

1 A. Yeah.

2 Q. Did they also have an agreement with an entity in  
3 Willmar, a contract?

4 A. Yes.

5 Q. And with a certain restaurant; is that right?

6 A. Correct.

7 Q. What was that restaurant called?

8 A. Restaurant was called FaaFan.

9 Q. And where was FaaFan Restaurant located?

10 A. FaaFan was right around the corner in the downtown  
11 there. The address was 426 Litchfield Avenue.

12 Q. Okay. And you have a picture of that, don't you?

13 A. Yeah.

14 Q. I'm going to show you what's been marked but not yet  
15 admitted as Government Exhibit G39, and it's a couple pages  
16 here, correct?

17 A. Yes.

18 Q. And do those pictures fairly and accurately depict the  
19 FaaFan Restaurant back in this time?

20 A. Yes.

21 MR. THOMPSON: Your Honor, I move to admit  
22 Government's Exhibit G39.

23 THE COURT: Any objection?

24 MR. UDOIBOK: No objection.

25 MR. COLICH: No objection.

1 THE COURT: G39 is admitted and may be published.

2 MR. THOMPSON: Okay. Inspector, I'm going to  
3 start with page 2, actually let's start with page 4.

4 BY MR. THOMPSON:

5 Q. Actually, let's start with page 4. Explain for the jury  
6 what page 4 of Government Exhibit G39 depicts?

7 A. Page 4 is, it's a screenshot from Google street view of  
8 Litchfield or Litchfield Street in downtown Willmar.

9 Q. Okay. This is the street we were talking about?

10 A. Yeah.

11 Q. The quaint kind of Main Street feel?

12 A. Yeah.

13 Q. And the FaaFan Restaurant is located here on the right;  
14 is that correct?

15 A. Yeah.

16 Q. And directing your attention to page 3 is next to the  
17 jewelry store?

18 A. Yes.

19 Q. In the center it's kind of a beige storefront?

20 A. At that time, yeah.

21 Q. And it says FaaFan Restaurant out front?

22 A. Correct.

23 Q. And page 2 is a better picture of it?

24 A. Yes.

25 Q. How big is FaaFan Restaurant?

1 A. Not very big. Talking about square foot, square  
2 footage?

3 Q. Smaller than this courtroom, I take it?

4 A. Oh, yeah, smaller than the courtroom.

5 Q. A quarter of the size of this courtroom?

6 A. Yeah.

7 Q. Okay. There's some more pictures here at Government  
8 Exhibit G39; is that correct?

9 A. Correct.

10 Q. All right. We just looked at G6. And right away  
11 starting in October of 2020, it was 3,000 meals a day,  
12 breakfast and lunch, at this Stigma-Free, Willmar site; is  
13 that right?

14 A. Right.

15 Q. And that goes on into November of 2020, directing your  
16 attention to page 6 of Government Exhibit G6; is that right?

17 A. Yes.

18 Q. How would you describe these counts?

19 A. Inflated, fraudulent.

20 Q. Okay.

21 A. Unbelievable.

22 Q. Why do you say that?

23 A. Well, for a variety of reasons. You see -- every day  
24 there's very little variety in the number of kids served.

25 The fact that Willmar has 4,000 kids in their school

1 district and they're purporting to feed 75 percent of that  
2 number here every single day.

3 Q. At that little storefront?

4 A. At that little storefront.

5 Q. And this goes on through the March of, the month of  
6 November, correct, 2020, 3,000 a day?

7 A. Yes.

8 Q. Okay. During the investigation, Inspector, did you look  
9 at the meal counts for other months for this site?

10 A. Yes.

11 Q. And in fact during the investigation, there was a search  
12 warrant executed at Feeding Our Future's office; is that  
13 right?

14 A. Correct.

15 Q. In St. Anthony, Minnesota?

16 A. Yes.

17 Q. And there were documents recovered during that search,  
18 correct?

19 A. Correct.

20 Q. Including the documents from the various sites sponsored  
21 by Feeding Our Future?

22 A. Yes.

23 Q. Were there documents recovered or files recovered  
24 related to Stigma-Free, Willmar?

25 A. Yes.

1 Q. I want to show you some of those, and I'm pretty sure  
2 they are admitted into evidence already. G40. I'm going to  
3 show you now what's been admitted as Government Exhibit G40.

4 Now, Inspector, this is one of the files or a copy  
5 of one of the files recovered during the search of Feeding  
6 Our Future's office in St. Anthony, Minnesota; is that  
7 right?

8 A. That's right.

9 Q. And you can see it's a manilla folder originally, right?

10 A. Yes.

11 Q. What's the label say?

12 A. FY20, November, Stigma-Free, Willmar.

13 Q. And on page 2, the first page in this folder is a  
14 monthly claim packet; is that right?

15 A. Yes.

16 Q. For Stigma-Free, Willmar?

17 A. Correct.

18 Q. And inside of it there's more of those meal count  
19 sheets?

20 A. Yes.

21 Q. For again the Stigma-Free, Willmar site?

22 A. Correct.

23 Q. Sponsored by Feeding Our Future?

24 A. Yes.

25 Q. An email of aimee@feedingourfuturemn.org?

1 A. Yes.

2 Q. Are you familiar with that email account?

3 A. Yes.

4 Q. Whose account is it?

5 A. Aimee Bock's.

6 Q. Okay. This is the one for the week of November 1st,  
7 2020. Again, what are the accounts that were recovered from  
8 Feeding Our Future for the Stigma-Free, Willmar site the  
9 week of November 1st, 2020?

10 A. Every day of the week, they purported to serve just  
11 under 3,000 children.

12 Q. And I'm going to page through this exhibit. There's  
13 eight pages total. All of the, the entire contents of this  
14 folder are in this exhibit, correct?

15 A. Correct.

16 Q. And what do they consist of?

17 A. Meal counts.

18 Q. Are they all pretty much identical?

19 A. Yes.

20 Q. 3,000 a day?

21 A. Yes.

22 Q. You mentioned that there's, the number of meals received  
23 and prepared and the number of firsts served to children,  
24 does that second number ever fall below 2,990?

25 A. Not that I've seen.

1 Q. Is there ever a day when kids just don't show up to get  
2 the food, according to the meal counts?

3 A. No.

4 Q. Is there ever a day here where they bill for less than  
5 the 3,000?

6 A. No.

7 Q. I'm going to show you now what's been admitted as  
8 Government Exhibit G41. And this is another folder that was  
9 recovered during the search of Feeding Our Future; is that  
10 right?

11 A. Yes.

12 Q. This one's December 2020, Stigma-Free, Willmar; is that  
13 right?

14 A. Correct.

15 Q. And there's a monthly claim packet, correct?

16 A. Yep.

17 Q. And there's a claim summary here; is that right?

18 A. Yes.

19 Q. Could you read at the top what it says here?

20 A. Yeah. "The following information was submitted to the  
21 Minnesota Department of Education to obtain your food  
22 program reimbursement. You will receive the funds in  
23 approximately one week, and we will either mail you a check  
24 or directly deposit your funds. Please let us know if you  
25 have any questions regarding your claim."

1 Q. And this claim, the site again is Stigma-Free, Willmar?

2 A. Yes.

3 Q. Claim month, December 2020?

4 A. Correct.

5 Q. It says the number of breakfasts served. How many?

6 A. 71,873.

7 Q. Number of lunches?

8 A. Also 71,873.

9 Q. And what's the date this was submitted to the Minnesota  
10 Department of Education?

11 A. It's January 8th, 2021.

12 Q. Directing your attention to page 6. Does this folder  
13 contain the meal counts for Stigma-Free, Willmar in  
14 December 2020?

15 A. Yes.

16 Q. And how would you describe them?

17 A. Inflated, unbelievable.

18 Q. What are the numbers each day?

19 A. Always over 2,990.

20 Q. The meals prepared 3,000, 3,000, 3,000?

21 A. Yes.

22 Q. Which meals?

23 A. Breakfast and lunch.

24 Q. I'm going to show you now what's been admitted as  
25 Government Exhibit G42. And is this a folder containing,

1 recovered from the search of Feeding Our Future?

2 A. Yes.

3 Q. And this relates to the Stigma-Free, Willmar site claims  
4 for January of 2021; is that right?

5 A. Correct.

6 Q. And what do we see here?

7 A. The same thing, with meals prepared 3,000 across the  
8 board, meals served to children always above 2,995, '96.

9 Q. Now, Inspector, we were just going through G41, and we  
10 were looking at the meal counts for December of 2020. I  
11 want to take you back and confirm something.

12 You are looked at the Stigma-Free International  
13 bank account that was opened at this time frame, right?

14 A. Correct.

15 Q. What, if any, economic activity -- what, if any,  
16 activity occurred in that account in December of 2020 when  
17 Stigma-Free purported to be serving 3,000 breakfasts and  
18 3,000 lunches a day in Willmar, Minnesota?

19 A. There was very little activity, if any.

20 Q. Was there any deposit into the account that month?

21 A. No.

22 Q. How about November of 2020 when the site also purported  
23 to be serving 3,000 breakfasts and 3,000 lunches to kids in  
24 Willmar, Minnesota?

25 A. Same thing. Next to no activity.

1 Q. Just that \$5 a month service free?

2 A. Correct.

3 Q. Had there been any food purchased by Stigma-Free  
4 International?

5 A. No.

6 Q. Any employees paid?

7 A. No.

8 Q. I'm going to show you now G43 which is also in evidence.  
9 Is this another folder recovered during the search of  
10 Feeding Our Future?

11 A. Yes.

12 Q. And this is for the claims, the claims for the month of  
13 February of 2021?

14 A. Correct.

15 Q. And what do we see on page 3?

16 A. More of the same. Breakfast served, prepared 3,000.  
17 And right across the board, number of kids served, at least  
18 2,996 every day.

19 Q. Just paging through this exhibit, the entire month it  
20 stays at the same?

21 A. Yes.

22 Q. Showing you now G44. Another folder recovered from  
23 Feeding Our Future, correct?

24 A. Correct.

25 Q. For the month of March 2021?

1 A. Yes.

2 Q. Stigma-Free, Willmar?

3 A. Yep.

4 Q. How many breakfasts and lunches did Stigma-Free, Willmar  
5 claim to be serving in March of 2021?

6 A. They claimed to be serving every day at least 2,995  
7 kids.

8 Q. Been going on for several months here. So this  
9 continues through March, correct?

10 A. Yes.

11 Q. Do you see any variation in these meal count numbers?

12 A. Very little.

13 Q. Now let me just stop here, because this is happening in  
14 early 2021, correct?

15 A. Correct.

16 Q. And in fact, it started in October of 2020; is that  
17 right?

18 A. Yes.

19 Q. Now, you -- that was during the COVID-19 pandemic; is  
20 that correct?

21 A. Correct.

22 Q. Talk to me a little bit about what you recall in late  
23 2020, early 2021 in terms of the COVID pandemic and its  
24 effect on the world.

25 A. Everybody was scared and panicked.

1 Q. Do you have kids?

2 A. Yes.

3 Q. Did you -- was there some variation in terms of  
4 attendance in how the school districts worked?

5 A. Yeah, the school districts were remote. Many of the  
6 school districts, including the one my kids go to, offered  
7 lunches to go. You can drive and pick them up. I think  
8 that's similar across numerous school districts.

9 Q. Did you ever try going out to eat during COVID or  
10 getting takeout?

11 A. Tried, yeah.

12 Q. And what, what kind of success did you have? I assume  
13 varying levels.

14 A. Yeah, varying levels.

15 Q. What caused the varying levels of success?

16 A. Some places were open. Some places weren't open.

17 Q. Were some places open sometimes and not other times?

18 A. Correct.

19 Q. What would lead to that, a place being shut down for  
20 like a day or a week?

21 A. Places, their employees would get COVID. They would be  
22 sick. They couldn't get supplies, et cetera.

23 Q. Did you see any of that type of variation with the  
24 Stigma-Free, Willmar count, Willmar site with respect to the  
25 counts that they submitted to Feeding Our Future and then on

1 to the Minnesota Department of Education?

2 A. No. Shockingly, as you guys could see, at least 2,990  
3 kids showed up every single day for the purported 3,000  
4 prepared meals, with little to no variance for winter  
5 snowstorms or people getting sick or this place having to  
6 get closed down because their employees were sick.

7 Q. Was there ever a day throughout the counts that you've  
8 seen where they just didn't submit a claim at all?

9 A. Never.

10 Q. Did they ever submit a lower claim that would result in  
11 a lower reimbursement?

12 A. No.

13 Q. I'm going to show you now what's been admitted as  
14 Government Exhibit 45. And this is another document or  
15 folder recovered from, during the search of Feeding Our  
16 Future; is that correct?

17 A. Yes.

18 Q. And these are counts for the Stigma-Free, Willmar site  
19 for April 2021; is that correct?

20 A. Correct.

21 Q. What do we see here starting on page 3?

22 A. More meal counts.

23 Q. Okay. And again, could you describe them for the jury  
24 here?

25 A. Yeah. Inflated, fake, unbelievable. Same thing.

1 Number of children served each day was at least 2,995.

2 Q. Showing you now Government Exhibit G46, which is the  
3 folder recovered from Feeding Our Future titled Stigma-Free,  
4 Willmar, June 2021; is that right?

5 A. That's right.

6 Q. And what do we see here starting at page 3 with respect  
7 to the claims in June of 2021?

8 A. Starting on this meal count sheet, as you can see, the  
9 number of meals prepared went down from 3,000 to 2,000 a  
10 day. And the number of purported children served was just  
11 under 2,000.

12 Q. Again, always more than 1,990?

13 A. Yes.

14 Q. And that, other than going down to 2,000, do we see the  
15 same consistency day after day --

16 A. Same pattern, yes.

17 Q. -- in June of 2021.

18 Government Exhibit G47, which has been admitted  
19 into evidence, is a folder recovered from Feeding Our Future  
20 titled FY21 Stigma-Free, Willmar, July; is that right?

21 A. Correct.

22 Q. And it contains the meal counts for July of 2021; is  
23 that right?

24 A. Yes.

25 Q. For Stigma-Free, Stigma-Free, Willmar what do we see in

1 terms of the counts in July of 2021?

2 A. We're still at the 2,000 prepared and purported to serve  
3 still just hovering right you around 2,000, the lowest being  
4 1,993 that week.

5 Q. G, Government Exhibit G48, are the claims, another  
6 folder titled FY21 August, Stigma-Free, Willmar; is that  
7 right?

8 A. Correct.

9 Q. And is the claim packet for Stigma-Free, Willmar; is  
10 that right?

11 A. Yes.

12 Q. And I want to direct your attention to page 4 of this  
13 exhibit. There's an invoice in here; is that right?

14 A. Yes.

15 Q. Could you describe this invoice for us?

16 A. This is an invoice from Safari Restaurant for meals,  
17 breakfast and lunch, 2,000 a day, for the month of August.

18 Q. And is there a site listed?

19 A. Yeah.

20 Q. Is that Safari Restaurant purported to be serving  
21 breakfast and lunch?

22 A. Yeah. Stigma-Free, Willmar.

23 Q. Okay. And each day, starting August 1st, 2021, how many  
24 meals and which meals did Safari Restaurant purport to be  
25 serving at the Stigma-Free, Willmar site?

1 A. Breakfast and lunch and 2,000.

2 Q. And so that's breakfast, that's 2,000 breakfast and  
3 2,000 lunch; is that correct?

4 A. That's correct.

5 Q. And how much was Safari Restaurant billing or invoicing  
6 each day for providing those 2,000 breakfasts and 2,000  
7 lunches at Stigma-Free, the Stigma-Free, Willmar site?

8 A. Each day was \$14,220.

9 Q. And then page 6, sorry, page 5 of Government Exhibit 48,  
10 what is the total amount the Safari Restaurant billed for  
11 providing meals at the Stigma-Free, Willmar site in August  
12 of 2021?

13 A. \$440,820.

14 Q. And who did they bill that -- who did Safari Restaurant  
15 bill that to?

16 A. Feeding Our Future.

17 Q. Federal Child Nutrition Program funds?

18 A. Yes.

19 Q. And page 7 here, there's the meal counts for those meals  
20 purportedly served by Safari Restaurant at the Stigma-Free,  
21 Willmar site in August of 2021; is that right?

22 A. That is correct.

23 Q. Could you just generally describe them? They look  
24 similar to the other ones; is that right?

25 A. Yes.

1 Q. What do they show?

2 A. They show breakfast, and they show the number of meals  
3 prepared, 2,000; and the children served, the lowest being  
4 1,992.

5 Q. And who is listed as the supervisor of this site?

6 A. Abdikadir Mohamud.

7 Q. And just paging through Government Exhibit G48, every  
8 day it's that same 2,000 breakfast, 2,000 lunch?

9 A. Yes.

10 Q. Showing you now what's been admitted as Government  
11 Exhibit G51. What's Government Exhibit G51?

12 A. Stigma-Free, Willmar, October documents.

13 Q. Okay. This is from the search of Feeding Our Future?

14 A. Yes.

15 Q. There's an invoice, but I'll come back to it here.  
16 There's several invoices in here, correct?

17 A. Correct.

18 Q. The first one here on page 3 is an invoice from a  
19 company called Afro Produce; is that right?

20 A. That's correct.

21 Q. And what's the, who is being billed?

22 A. Brava Restaurant in Rochester, Minnesota.

23 Q. And then how about on page 5. There's another invoice  
24 purportedly from Afro Produce?

25 A. Correct.

1 Q. What's this one?

2 A. They are billing Safari Restaurant in Minneapolis.

3 Q. Not Stigma-Free, Willmar, I take it?

4 A. That's correct.

5 Q. Okay. All right. Starting on page 6 of Government  
6 Exhibit G51, there's meal counts for October 2021 for the  
7 Stigma-Free, Willmar site?

8 A. Correct.

9 Q. Just paging through, what do we see again?

10 A. Same thing. 2,000 prepared and purported served, at  
11 least 1,992.

12 Q. Now there's actually a roster, attendance roster,  
13 attached to this; is that right?

14 A. Correct.

15 Q. Could you describe that? It starts at page 12 of  
16 Government Exhibit G51.

17 A. Yeah, this is an attendance roster. They are purporting  
18 to confirm that all these individual kids with these names  
19 showed up and got a meal on these particular dates.

20 Q. You say "purporting" to list the kids?

21 A. Yeah.

22 Q. Why do you use the word "purporting"?

23 A. Because I believe the list is fake.

24 Q. Why do you say that?

25 A. Agents have done some research on it, and I think they

1 compared some of these lists against the Willmar School  
2 District and found infinitesimal match, like 33 names  
3 matched I believe across the two lists.

4 Q. You said agents compared it to the list of Willmar  
5 Public Schools?

6 A. Yes.

7 Q. Like the entire list of 4,000 kids that attend school  
8 there?

9 A. Correct.

10 Q. And they compared that list to the rosters of 2,000  
11 names here?

12 A. That's correct.

13 Q. I know you didn't do this comparison, but you have a  
14 general sense what it found, correct?

15 A. Yes.

16 Q. When they compared the roster of kids who purportedly  
17 received meals at the Stigma-Free, Willmar site, all 2,000  
18 names, with the list of all 4,000 kids that attend school or  
19 that attended school at the time at the Willmar Public  
20 School District, what did they find?

21 A. I think they found that, I think 33 or less than 50  
22 matched.

23 Q. Okay. Fake names?

24 A. Fake names.

25 Q. One of your colleagues will talk to us more about that

1 later; is that right?

2 A. Correct.

3 Q. I'm going to show you now what's been admitted as  
4 Government Exhibit G52. And this is another folder  
5 recovered during the search of Stigma-Free, Willmar; is that  
6 right?

7 A. Correct.

8 Q. And it's -- I'm sorry -- during the search of Feeding  
9 Our Future?

10 A. Yeah. Sorry.

11 Q. It's labeled --

12 A. That's correct.

13 Q. -- November Stigma-Free, Willmar, correct?

14 A. Yes.

15 Q. And directing your attention to the second page, there's  
16 meal counts for the month of November 2021; is that right?

17 A. Correct.

18 Q. Which site?

19 A. Stigma-Free, Willmar.

20 Q. Supervisor?

21 A. Abdikadir Mohamud.

22 Q. Sponsor?

23 A. Oh, Feeding Our Future.

24 Q. And then the number of meals each day?

25 A. Purported to be prepared, 2,000 and then purported

1 children served, at least 1,995 each day.

2 Q. And that goes on day after day throughout the month of  
3 November 2021?

4 A. Correct.

5 Q. And then again, there's a list of another, another  
6 roster attached here; is that correct?

7 A. That's correct.

8 Q. Page 7?

9 A. Yes.

10 Q. And actually it lists -- it says Stigma-Free  
11 International, but then it says 1130 Holding Inc. Do you  
12 know what 1130 Holding is?

13 A. Yeah. It's another individual involved in the case has  
14 a holding company.

15 Q. Okay. Showing you now what's been admitted as  
16 Government Exhibit G53, and this is another folder recovered  
17 during the search of Feeding Our Future, correct?

18 A. Yes.

19 Q. And this is the Stigma-Free, Willmar claims for  
20 December 2021?

21 A. Correct.

22 Q. And again, there's meal counts?

23 A. Yes.

24 Q. And what do the meal counts show for this month of  
25 December 2021?

1 A. Same as the previous month. The purportedly prepared  
2 2,000 a day and served almost 2,000 kids a day.

3 Q. Okay. All right. Inspector Western, before I move on,  
4 I want to talk about how these claims got submitted to  
5 Feeding Our Future. Okay?

6 A. Okay.

7 Q. They were actually sent via email; is that correct  
8 generally?

9 A. That's correct.

10 Q. I'm going to show you what's been marked but not yet  
11 admitted as Government Exhibit G8.

12 And is this an email from Ahmed Artan, using a  
13 Stigma-Free MN gmail account to Feeding Our Future?

14 A. Yes.

15 MR. THOMPSON: Your Honor, I move to admit  
16 Government Exhibit G8.

17 MR. UDOIBOK: No objection.

18 MR. COLICH: No objection.

19 THE COURT: G8 is admitted and may be published.

20 BY MR. THOMPSON:

21 Q. Inspector, can you tell us who this email is from and  
22 who is it sent to?

23 A. Yeah, it is from Stigma-Free. The Stigma-Free email  
24 address is stigma-freemnl@gmail.com, and it is addressed to  
25 claims@feedingourfuture.org, and then copied on it is

1       idleh@feedingourfuture.org, who is an employee of Feeding  
2       Our Future.

3       Q.   One of the defendants in this case?

4       A.   Yes.

5       Q.   And the date on this is February 28th of 2021?

6       A.   Correct.

7       Q.   What's the subject line?

8       A.   Subject line is February 2021 Claims for Stigma-Free,  
9       Willmar.

10      Q.   Okay.  And what's attached here starting at page 2?

11      A.   Meal count sheets.

12      Q.   For February 2021?

13      A.   Yes.

14      Q.   Some of those same meal count sheets that were later  
15      found during the search of Feeding Our Future?

16      A.   Yes.

17      Q.   I'm just paging through.  Again 3,000 a day, correct?

18      A.   Yes.

19      Q.   Okay.  And that one was sent by Ahmed Artan, correct?

20      A.   Correct.

21      Q.   Okay.  I'm going to show you now what's been marked but  
22      not yet admitted as Government Exhibit G12.

23                   Is this another email submitting meal counts for  
24      the Stigma-Free, Willmar site to Feeding Our Future?

25      A.   Yes.

1 MR. THOMPSON: Your Honor, I move to admit  
2 Government Exhibit G12.

3 THE COURT: Any objection?

4 MR. UDOIBOK: No objection.

5 MR. COLICH: No objection.

6 THE COURT: G12 is admitted and may be published.

7 BY MR. THOMPSON:

8 Q. All right. This one is unsigned; is that right?

9 A. Yes.

10 Q. And but what email account is used to submit this email?

11 A. The same one as the last one, the  
12 stigma-freemn1@gmail.com.

13 Q. Okay. Who is it sent to?

14 A. Claims@feedingourfuture.org and  
15 eidleh@feedingourfuture.org -- feedingourfuturemn.org

16 Q. What's the --

17 A. mn.org.

18 Q. What's the subject line?

19 A. Subject line is March 2021 Claims for Stigma-Free,  
20 Willmar-Tunyar Trading LLC.

21 Q. Okay. What's the date?

22 A. April 1st, 2021.

23 Q. And attached there are more meal counts for both  
24 breakfast and lunch purportedly served at the Stigma-Free,  
25 Willmar site?

1 A. Yes.

2 Q. These are some of the same ones that were later  
3 recovered during the search of Feeding Our Future?

4 A. Correct.

5 Q. I'm going to show you now what's been marked but not yet  
6 admitted as Government Exhibit G16.

7 Actually, I'm going to skip that one, I think.

8 I'm going to show you G15. Sorry. I'm sorry.

9 One second here. Actually I'm going to show you G28.

10 A. Okay.

11 Q. Okay. Inspector, now that I've figured out where I am.

12 Government Exhibit G28, is this an email?

13 A. Yes.

14 Q. Dated November 20th -- November 3rd, 2021?

15 A. Yes.

16 Q. And who is it from and who is it to?

17 A. It's from Abdikadir Mohamud to Salim Said.

18 Q. Okay. And what's the subject line?

19 A. Stigma-Free, Willmar, September Meal Documents.

20 MR. THOMPSON: Your Honor, I move to admit  
21 Government Exhibit G28.

22 THE COURT: Any objection?

23 MR. UDOIBOK: No.

24 MR. COLICH: No objection, Your Honor.

25 THE COURT: G28 is admitted and may be published.

1 BY MR. THOMPSON:

2 Q. All right. Inspector, again, this is an email from one  
3 of the defendants in this case Abdikadir Mohamud; is that  
4 right?

5 A. That's right.

6 Q. And it is sent to an email address  
7 salimsaid4040@gmail.com?

8 A. Yes.

9 Q. Do you recognize that email address?

10 A. Yes.

11 Q. Whose email address is that?

12 A. Salim Said's.

13 Q. The defendant in this case?

14 A. Correct.

15 Q. Sitting right behind me?

16 A. Yes.

17 Q. Okay. The subject line of this email that's dated  
18 November 3rd, 2021?

19 A. Yes.

20 Q. What's the subject line?

21 A. Stigma-Free, Willmar, September Meal Documents.

22 Q. Okay. And there's attachments; is that right?

23 A. Yes.

24 Q. And specifically there is a, on page 2 it starts with an  
25 invoice; is that right?

1 A. Yes.

2 Q. And what's -- could you describe the invoice for us?

3 A. The invoice is from Stigma-Free, Willmar, billing to  
4 Feeding Our Future, for September 2021 daily meals.

5 Q. And how many daily meals are being billed on this  
6 invoice that was sent from Abdikadir Mohamud to Salim Said?

7 A. Looks like -- can you scroll down a tiny bit? It looks  
8 like almost at least 1,993 a day, close to 2,000 a day.

9 Q. And how much is being charged every day for meals  
10 purportedly served at the Stigma-Free, Willmar site?

11 A. At least 10,200.

12 Q. And the total amount that Stigma-Free is billing for  
13 this, for meals purportedly served at the Stigma-Free,  
14 Willmar site in September 2021?

15 A. Yes. That's \$246,798.30.

16 Q. And who are they billing that to?

17 A. Feeding Our Future.

18 Q. And to be clear, Feeding Our Future, when it gets these  
19 claims, what do they do with it?

20 A. They submit them to MDE for payment.

21 Q. Okay. What kind of payment? What kind of funds do they  
22 get based on these claims?

23 A. What kind of funds?

24 Q. Yeah. Where does the money come from?

25 A. Oh, the U.S. Department of Agriculture.

1 Q. Federal Child Nutrition Program funds?

2 A. Yes. Yes.

3 Q. Okay. There's a roster attached to this email that was  
4 sent to Salim Said on November 3rd, 2021; is that right?

5 A. That's right.

6 Q. What's the roster purport to show?

7 A. It purports to show for those first four days of  
8 September 2021 the names of purported children that were  
9 served and the days they showed up.

10 Q. Is this one of lists that your colleagues compared to  
11 the enrollment, the total enrollment of Willmar Public  
12 Schools?

13 A. Yes.

14 Q. And found not to match?

15 A. Yes.

16 Q. All right. Now I'm going to direct your attention to  
17 page 179 in this exhibit which is, after the roster, there  
18 was also some meal counts attached to this email; is that  
19 correct?

20 A. Yes.

21 Q. Okay. And starting at page 179, are these the meal  
22 counts that Abdikadir Mohamud sent to Salim Said?

23 A. Yes.

24 Q. And could you just describe them for the record quick?

25 A. Yeah. These are meal count sheets. This one here

1 happens to be from the week of September 7th, 2021. The  
2 meal types is supper, and the sponsor is Feeding Our Future.  
3 And they purport to prepare 2,000 a day and serve almost  
4 2,000 children a day.

5 Q. Okay. And that continues for the entire month of  
6 September 2021; is that correct?

7 A. That's correct.

8 Q. Okay. After receiving this email from Abdikadir  
9 Mohamud, Salim Said actually forwards this information  
10 along; is that right?

11 A. That's correct.

12 Q. I'm going to show you what's been marked, but not yet  
13 admitted, as Government Exhibit G29.

14 And is this an email from Salim Said to Feeding  
15 Our Future that same day, November 3rd, 2021?

16 A. Yes.

17 MR. THOMPSON: Your Honor, I move to admit  
18 Government Exhibit G29.

19 THE COURT: Any objection?

20 MR. UDOIBOK: No objection.

21 MR. COLICH: No objection Your Honor.

22 THE COURT: G29 is admitted.

23 BY MR. THOMPSON:

24 Q. All right. Inspector Western, this email on  
25 November 3rd, 2021, who is it from?

1 A. Salim Said.

2 Q. And who does he send it to?

3 A. He sends it to two email addresses.

4 Claims@feedingourfuturemn.org and an employee of Feeding Our  
5 Future, asia@feedingourfuturemn.org.

6 Q. And the subject line?

7 A. September Meal Count, Summer Days.

8 Q. Dot PDF?

9 A. Yep.

10 Q. And starting at page 2, what is this attachment that  
11 Salim Said submits to Feeding Our Future?

12 A. It's a meal count and starting the week of  
13 September 1st, 2021, for Stigma-Free, Willmar, breakfast.

14 Q. How many a day breakfasts?

15 A. They're purporting to serve at least 1,996 kids a day.

16 Q. And on page -- as we keep paging through here, what do  
17 we see? This is the same amount every day for this last  
18 period of September 2021?

19 A. Yes.

20 Q. 2,000 a day, just under?

21 A. Yes.

22 Q. I'm showing you now Government Exhibit G30, not yet in  
23 evidence. Is this another email from Salim Said to Feeding  
24 Our Future?

25 A. Yes.

1 Q. On November 3rd, 2021?

2 A. Correct.

3 MR. THOMPSON: Your Honor, I move to admit  
4 Government Exhibit G30.

5 THE COURT: Any objection?

6 MR. UDOIBOK: No objection.

7 MR. COLICH: No objection, Your Honor.

8 THE COURT: G30 is admitted.

9 BY MR. THOMPSON:

10 Q. All right. Inspector Western, could you describe this  
11 one at the header here?

12 A. Yeah. Email from Salim Said's gmail address to  
13 claims@feedingourfuturemn.org. Subject line, September Meal  
14 Count, Summer Days, sent November 3rd, 2021, at about 3:42.

15 Q. Okay. And attached are these same type of meal counts;  
16 is that right?

17 A. Correct.

18 Q. Okay. Now, Agent Western or Inspector Western -- I'm  
19 sorry -- you, you mentioned a company called Tunyar Trading.

20 A. Yes.

21 Q. Remind us again what Tunyar Trading is.

22 A. Tunyar Trading is a vendor who signed up as a vendor  
23 company. It's owned by Mr. Mohamud, and it was involved  
24 with the Willmar, with the Willmar site.

25 Q. Purported to be the vendor; is that right?

1 A. Yes, purported to be the vendor.

2 Q. Now I know some of our forensic accountant friends will  
3 be testifying about the flow of money between these  
4 different entities; is that right?

5 A. Yeah. Much more in-depth.

6 Q. Okay. And in fact, earlier when we were looking at  
7 Government Exhibit W11, which is back on the screen, this is  
8 that Stigma-Free account, correct?

9 A. Correct.

10 Q. We were looking at those initial deposits into the  
11 account, correct?

12 A. Yes.

13 Q. And those big 400,000 \$300,000 checks?

14 A. Correct.

15 Q. In January of 2021?

16 A. Yes.

17 Q. And then there was the first withdrawal from the account  
18 is in January of 2021 -- or January 27th of 2021, correct?

19 A. Correct.

20 Q. And who is that -- to what entity are the funds  
21 transferred?

22 A. Tunyar Trading LLC.

23 Q. Okay. And this is a check -- just to be clear, this is  
24 page 43 of Government Exhibit W11, correct?

25 A. Yes.

1 Q. And it's a check from Stigma-Free International?

2 A. Correct.

3 Q. January 27th, 2021?

4 A. Yes.

5 Q. It's to Tunyar Trading?

6 A. Yes.

7 Q. What's the amount of the check?

8 A. \$741,344.43.

9 Q. What's the memo line?

10 A. Vendor.

11 Q. And who signed the check?

12 A. Ahmed Artan.

13 Q. Okay. Now, Tunyar Trading, did Salim Said have a  
14 relationship with Tunyar Trading?

15 A. Yes.

16 Q. I'm going to show you what's been marked but not yet  
17 admitted as Government Exhibit T4.

18 T as in Thomas, yeah.

19 And, Inspector Western, is this an email from  
20 Abdikadir Mohamud to Salim Said?

21 A. Yes.

22 Q. On May 4th, 2021?

23 A. Correct.

24 MR. THOMPSON: Your Honor, I move to admit  
25 Government Exhibit T4.

1 MR. UDOIBOK: No objection.

2 MR. COLICH: No objection, Your Honor.

3 THE COURT: T4 is admitted.

4 BY MR. THOMPSON:

5 Q. All right. Inspector, an email from defendant Abdikadir  
6 Mohamud, correct?

7 A. Correct.

8 Q. To defendant Salim Said?

9 A. Correct.

10 Q. The subject line, Forward Tunyar Trading Consulting  
11 Agreement?

12 A. Yes.

13 Q. And what's attached?

14 A. The attachment is Consulting Agreement 2.

15 Q. And this is an unsigned/undated consulting agreement; is  
16 that right?

17 A. Correct.

18 Q. And who is the consulting agreement between?

19 A. Tunyar Trading and Salim Limited.

20 Q. And we talked about Tunyar Trading, right?

21 A. Yes.

22 Q. What's Salim Limited?

23 A. That's a company owned by Mr. Said.

24 Q. Does it have any operations, as far as you know?

25 A. Not that I'm aware of.

1 Q. How does Mr. Salim or Mr. Salim Said use that account?

2 A. As a shell company.

3 Q. And it says here -- it lists Salim Limited as the  
4 consultant; is that right?

5 A. Correct.

6 Q. For Tunyar Trading. And what services does the  
7 consultant agree, Mr. Said's company, agree to provide to  
8 Tunyar Trading?

9 A. It reads, "The client hereby agrees to engage the  
10 consultant to provide the client with the following  
11 consulting services, known as the Services. Services will  
12 include analyzing client needs and current business  
13 obstacles, identifying projects, scoping potential business  
14 solutions, and improving sales by coordinating sales efforts  
15 with both inside and field sales representatives."

16 Q. And directing your attention to page 3 of Government  
17 Exhibit T4, what does Mr. Salim Said's company Salim Limited  
18 stand to gain from providing these consulting services to  
19 Tunyar Trading?

20 A. Ten percent of Tunyar Trading net profit.

21 Q. Thank you.

22 THE COURT: You're completed with your  
23 questioning?

24 MR. THOMPSON: I have two more questions I suppose  
25 I can leave us with, if we want to, Your Honor.

1 THE COURT: Could you do that?

2 MR. THOMPSON: Yep.

3 BY MR. THOMPSON:

4 Q. Inspector Western, Tunyar Trading ran the Stigma-Free,  
5 Willmar site?

6 A. Correct.

7 Q. All together, how many meals did the defendants claim to  
8 serve at the Stigma-Free, Willmar site in 20 -- late 2020  
9 and 2021?

10 A. 1.6 million.

11 Q. All together, how much Federal Child Nutrition Program  
12 reimbursement funds did they receive for those claims -- the  
13 meals they claimed they provided at the Stigma-Free, Willmar  
14 site?

15 A. 5.3 million.

16 MR. THOMPSON: Thank you.

17 THE COURT: All right. We'll end here and take a  
18 break for lunch. Welcome back at 1:00 for  
19 cross-examination.

20 MR. THOMPSON: I have more testimony with him,  
21 Your Honor.

22 THE COURT: Oh, I didn't realize that. Well, then  
23 we won't come back for cross-examination. Welcome back for  
24 continued direct.

25 MR. THOMPSON: Thank you.

1 THE COURT: Fair enough. 1:00, everyone.

2 All rise for the jury.

3 12:04 p.m.

4 **IN OPEN COURT**

5 **(JURY NOT PRESENT)**

6 THE COURT: All right. Everyone. Recess until  
7 1:00.

8 (Recess taken at 12:05 p.m. till 1:04 p.m.)

9 1:04 p.m.

10 **IN OPEN COURT**

11 **(JURY PRESENT)**

12 THE COURT: You may all be seated.

13 Good afternoon everyone.

14 Mr. Thompson, you may continue.

15 MR. THOMPSON: Thank you, Your Honor.

16 BY MR. THOMPSON:

17 Q. Inspector Western, good afternoon. Welcome back.

18 A. Thank you.

19 Q. Before the break you were testifying about the total  
20 amount of claims that were submitted by Feeding Our Future  
21 and Stigma-Free International for meals purportedly  
22 distributed at the Stigma-Free, Willmar site; is that right?

23 A. That's right.

24 Q. Remind me again, how many total meals did they claim to  
25 have served at the Stigma-Free, Willmar site between

1 October 2020 and December 2021?

2 A. 1.6 million.

3 Q. 1.6 million meals?

4 A. Yep.

5 Q. And what was the total amount of Federal Child Nutrition  
6 Program funds reimbursements obtained based on those claims  
7 at the Stigma-Free, Willmar site?

8 A. \$5.3 million.

9 Q. You mentioned before, Inspector, that after acquiring  
10 Stigma-Free International, there were two sites that were  
11 actually enrolled in the program under the sponsorship of  
12 Feeding Our Future within a matter of a week or so, correct?

13 A. Correct.

14 Q. The one site we just talked about was Willmar, but  
15 remind me what the second site was.

16 A. Mankato, Minnesota.

17 Q. Okay. Where is Mankato, Minnesota?

18 A. It's about 90 miles straight south of here, southeast a  
19 little bit, maybe.

20 Q. Southwest?

21 A. Of the Twin Cities.

22 Q. Yeah. What's the population of Mankato?

23 A. About 44,000.

24 Q. Okay. And did they have a public school district there?

25 A. Yeah.

1 Q. I think it's Mankato Area Public Schools; is that right?

2 A. Yes.

3 Q. What's the total enrollment in the Mankato Areas Public  
4 School District?

5 A. I think just over 8,000 kids.

6 Q. Okay. I want to show you now Government Exhibit H1,  
7 which is not yet in evidence, I don't believe.

8 Is this the email that submitted a site  
9 application on behalf of the Stigma-Free International,  
10 Mankato site?

11 A. Yes.

12 MR. THOMPSON: Your Honor, I move to admit  
13 Government Exhibit H1.

14 MR. UDOIBOK: No objection.

15 MR. COLICH: No objection Your Honor.

16 THE COURT: H1 is admitted and may be published.

17 MR. THOMPSON: Thank you, Your Honor.

18 BY MR. THOMPSON:

19 Q. All right. Inspector, I'm showing you page 1 of  
20 Government Exhibit H1. Can you describe what we're looking  
21 at here?

22 A. It's an email from Aimee Bock at her Feeding Our Future  
23 email address to an MDE address and an MDE employee's  
24 address. The subject is Site Application, Stigma-Free  
25 International, Mankato.

1 Q. And what's the date on, that Ms. Bock sent this email to  
2 MDE?

3 A. October 19th, 2020.

4 Q. How does that compare to the date on which she submitted  
5 the site application for the Stigma-Free, Willmar site?

6 A. Same date.

7 Q. In fact, I'm going to show you on the screen here,  
8 showing on the left side of the screen that email we were  
9 just looking at; is that correct?

10 A. Yes.

11 Q. And on the right side of the screen I'm going to show  
12 you what's been admitted as Government Exhibit G3.

13 And is that the site application that Ms. Bock  
14 submitted to MDE to open a site at, called Stigma-Free  
15 International, Willmar?

16 A. Correct.

17 Q. And again, just do the comparison. Can you compare the  
18 time at which she submitted these two applications?

19 A. Yeah. Excuse me. Mankato was done, looks like about,  
20 about 15 minutes or a little more than -- 20 minutes before  
21 the Willmar one.

22 Q. Okay. All right. So let's page through. On the left  
23 here is H1 at page 2. This is the Stigma-Free, Mankato  
24 application materials, correct?

25 A. Correct.

1 Q. And submitted by Aimee Bock?

2 A. Yes.

3 Q. And the site on page 7 of Government Exhibit H1, could  
4 you describe the location of the site?

5 A. Yeah. 1415 First Avenue, Mankato, Minnesota.

6 Q. And what's the start date for this contract?

7 A. The 10th of October, 2020.

8 Q. And I'm directing your attention on the right side of  
9 the screen to page 7 of Government Exhibit G3. How does  
10 that start date compare to the application Ms. Bock  
11 submitted for Stigma-Free International, Willmar?

12 A. Same date.

13 Q. On page 11 of Government Exhibit H1, who signed this  
14 contract on behalf of Stigma-Free?

15 A. Ahmed Artan.

16 Q. And who signed on behalf of Feeding Our Future?

17 A. Aimee Bock.

18 Q. What were the dates on which they signed this?

19 A. October 9th, 2020.

20 Q. How does that compare to the date on which Ahmed Artan  
21 had acquired Stigma-Free International?

22 A. Day after, couple days after.

23 Q. And on page 12 of Government Exhibit H1, there's a  
24 document that's called Sponsor Preoperational Visit to New  
25 Sites Child and Adult Care Food Program; is that right?

1 A. Correct.

2 Q. And does it talk about the date on which this  
3 preoperational visit was purportedly conducted?

4 A. Yeah, the visit date shows the 9th of October, 2020.

5 Q. Okay. Is there a similar document on the right side of  
6 your screen for the Stigma-Free, Willmar site?

7 A. Correct. Same date.

8 Q. Same day. Okay.

9 And on the left-hand side of page 17 of Government  
10 Exhibit 1, there's a signature for the person who approved  
11 the site after doing this operational visit. Whose  
12 signature appears?

13 A. It looks like Ahmed Artan and Aimee Bock.

14 Q. How about for on the right, Government Exhibit G3, is  
15 there also a signature for the approving the site to open  
16 after the preoperational visit at the Stigma-Free, Willmar  
17 site?

18 A. Yes. Signed by Ahmed Artan and Aimee Bock.

19 Q. What's the date on that one?

20 A. The 9th of October, 2020.

21 Q. Same date?

22 A. Same date.

23 Q. And then on page 18 of Government Exhibit H1, there's  
24 another document, Summer Food Service Program Sponsor  
25 Preoperational Site Visit; is that right?

1 A. That's right.

2 Q. What's the estimated number of meals to be served at  
3 this Stigma-Free, Mankato site?

4 A. 500.

5 Q. What's the site capacity listed at?

6 A. 500.

7 Q. How does that compare to the numbers for Stigma-Free,  
8 Willmar?

9 A. Exactly the same.

10 Q. And that's shown on the right here on Government  
11 Exhibit G3 at page 18?

12 A. Correct.

13 Q. Okay. We talked about for the Willmar site there was a  
14 catering contract with the concerned entity; is that right?

15 A. Yes. Tunyar Trading.

16 Q. Okay. What about Mankato? Was there also a vendor  
17 contract for the Stigma-Free, Mankato contract?

18 A. Yes.

19 Q. What was the entity that purportedly vended the meals  
20 for the Stigma-Free, Mankato site?

21 A. Horseed Management.

22 Q. And I'm going to show you now what's been marked, but  
23 not yet admitted, as Government Exhibit H3. Agent Western,  
24 is this an email from Abdikadir Mohamud to Abdikerm Eidleh  
25 with a catering contract for Stigma-Free, Mankato or Horseed

1 Management? I'm sorry.

2 A. Yes.

3 MR. THOMPSON: Your Honor, I move to admit  
4 Government Exhibit H3.

5 THE COURT: Any objection?

6 MR. UDOIBOK: No objection.

7 MR. COLICH: No objection.

8 THE COURT: H3 is admitted and may be published.

9 BY MR. THOMPSON:

10 Q. Inspector Western, could you describe for the record  
11 here Government Exhibit H3 in this email?

12 A. Yes, it's an email from Abdikadir Mohamud to Abdikerm  
13 Eidleh, a Feeding Our Future employee, sent on November 3rd,  
14 2020, with a subject line Catering Agreements for  
15 Stigma-Free, Mankato.

16 Q. And attached to this email is a catering contract; is  
17 that right?

18 A. Correct.

19 Q. And I'm directing your attention to page 2. Is this the  
20 vendor contract?

21 A. Yes.

22 Q. The contract is between the sponsor Feeding Our Future?

23 A. Correct.

24 Q. And Horseed Management; is that right?

25 A. Yes.

1 Q. What's Horseed Management?

2 A. It's a, it's the vendor. It's a shell company.

3 Q. Okay. And we'll get to the record in a second, but when  
4 was Horseed Management created?

5 A. In October of 2020.

6 Q. Okay. Before we get there, I want to compare this  
7 contract to the one for Stigma-Free, Willmar. Okay?

8 A. Yes.

9 Q. I want to put that one on the screen. That one is  
10 Government Exhibit G5. And that will be on the right side  
11 of the screen.

12 So okay. On the left side of the screen is the  
13 email we just looked at from Abdikadir Mohamud to Abdikerm  
14 Eidleh on November 30th, 2020, correct?

15 A. Correct.

16 Q. Containing the catering contract for Stigma-Free,  
17 Mankato?

18 A. Yes.

19 Q. And on the right side, we have a similar email sent that  
20 same day; is that right?

21 A. Correct.

22 Q. Okay. Who is this sent from?

23 A. Abdikadir Mohamud again to Abdikerm Eidleh, subject:  
24 Catering Agreements for Stigma-Free, Willmar.

25 Q. Okay. And just looking at the second page of both

1 Exhibit H3 and G5, how would you compare these contracts for  
2 Horseed Management on the left and Tunyar Trading on the  
3 right?

4 A. They look exactly the same.

5 Q. Okay. And this is for providing meals at the  
6 Stigma-Free, Mankato site; is that correct?

7 A. Correct.

8 Q. On page 9 of Government Exhibit H3, is there a signature  
9 on this vendor contract between Feeding Our Future and  
10 Horseed Management LLC?

11 A. Yes.

12 Q. Who signed it?

13 A. Aimee Bock signed it for the sponsor Feeding Our Future,  
14 and an individual named Abdinas Abshir signed it on behalf  
15 of Horseed.

16 Q. Who is Abdinas Abshir?

17 A. He's the individual that started Horseed Management.

18 Q. Okay. Is he one of the defendants in this case?

19 A. Yes.

20 Q. Not at trial here in this trial?

21 A. Correct.

22 Q. Okay. Inspector, Horseed Management, you said it was  
23 created in October of 2020; is that right?

24 A. Correct.

25 Q. Was that significant to you?

1 A. Yes.

2 Q. Why?

3 A. Again, it was shortly thereafter the changes in the food  
4 program switching to nonprofit, and it was right around the  
5 time of Stigma-Free changing hands.

6 Q. Okay. I'm going to show you what's been marked but not  
7 yet admitted as Government Exhibit H2.

8 Are these the Secretary of State documents related  
9 to the creation of Horseed Management LLC?

10 A. Correct.

11 MR. THOMPSON: Your Honor, I move to admit  
12 Government Exhibit H2.

13 MR. UDOIBOK: No objection.

14 MR. COLICH: No objection.

15 THE COURT: H2 is admitted and may be published.

16 BY MR. THOMPSON:

17 Q. And, Inspector, we've seen this before. When was  
18 Horseed Management LLC created according to this document?

19 A. October 9th, 2020.

20 Q. And page 2 contains the original articles of  
21 organization for this entity; is that right?

22 A. That's right.

23 Q. Who created the company on October 9th, 2020?

24 A. Abdinasir Abshir and his brother Asad Abshir.

25 Q. The address for the company is listed as 7201 York

1 Avenue South, Apartment 617, in Minneapolis, Minnesota?

2 A. Correct.

3 Q. Are you familiar with that address?

4 A. I am.

5 Q. How?

6 A. It's the address of Abdinasir Abshir at the time.

7 Q. Is it a commercial building or a residential building?

8 A. Apartment building.

9 Q. Okay. Is there a food vendor company or warehouse  
10 located this?

11 A. No.

12 Q. And who signed the original Articles of Incorporation to  
13 create Horseed Management?

14 A. Abdinasir Abshir.

15 Q. And is there an email address listed for the company?

16 A. Yeah, horseedmanagement@gmail.com.

17 Q. Now again this company was or Abdinasir Abshir created  
18 Horseed Management on October 9th, 2020. How does that  
19 relate to the acquisition of Stigma-Free International?

20 A. It's a day or two later.

21 Q. Did you look, Inspector Western, at the meal counts  
22 submitted, the claims that were submitted in terms of meals  
23 purportedly served at the Stigma-Free, Mankato site?

24 A. Yes.

25 Q. Can you generally describe what you found?

1 A. Similar to the Willmar site ones. They were inflated  
2 and obviously unreal.

3 Q. Okay. I'm going to show you -- how quickly after the  
4 formation of Stigma-Free or the acquisition of Stigma-Free  
5 International and the application to open the Stigma-Free,  
6 Mankato site did those meal counts start?

7 A. They started on the 19th of that month, just a week and  
8 a half later.

9 Q. Okay. I'm going to show you now, Agent, what's been  
10 marked but not yet admitted as Government Exhibit H5. Do  
11 you recognize Government Exhibit H5?

12 A. I do.

13 Q. What is it?

14 A. It's an email from Abdikadir Mohamud to Abdikerm Eidleh  
15 with the subject line Stigma-Free, Mankato,  
16 October/November, sent on December 30th of 2020.

17 Q. And is there an, are there attachments to this email?

18 A. Yes.

19 Q. Directing your attention to page 2. What's attached to  
20 these, this email?

21 A. Meal counts.

22 Q. Okay. For which site?

23 A. Stigma-Free, Mankato.

24 Q. Okay. And what sponsor is listed for this site on the  
25 meal count form?

1 A. Feeding Our Future.

2 Q. When do these meal counts start?

3 A. The week of October 19th, 2020.

4 Q. The first day, how many meals were purportedly served?

5 A. Purported to serve --

6 MR. THOMPSON: I'm sorry. I move to admit  
7 Government Exhibit H5 if I haven't already.

8 THE COURT: Any objection?

9 MR. UDOIBOK: No objection.

10 THE COURT: Five is admitted and may be published.

11 MR. THOMPSON: Thank you, Your Honor.

12 BY MR. THOMPSON:

13 Q. All right. Inspector, at the front here, this is from  
14 defendant Abdikadir Mohamud?

15 A. Yep.

16 Q. To Abdikerm Eidleh, a Feeding Our Future employee?

17 A. Yeah, and the claims address at Feeding Our Future.

18 Q. Okay. And these are the meal counts for October and  
19 November of 2020?

20 A. Correct.

21 Q. All right. Here we go. Page 2, can you describe what  
22 we're looking at?

23 A. Yeah. A meal count sheet, sponsor: Feeding Our Future.

24 The site is Stigma-Free, Mankato. They are doing lunch  
25 here, the week of starting October 19th, 2020.

1 Q. Okay. How many the first day?

2 A. First day, they purport to prepare 2700 meals with 2,695  
3 kids served.

4 Q. Day two?

5 A. 2800 and 2793.

6 Q. Day three?

7 A. 2900 and 2896.

8 Q. Day four?

9 A. 3,000, and the number purported kids served 2,991.

10 Q. Day 5 and 6?

11 A. 3,000 and at least 2994.

12 Q. If I just page through here, the rest of the month of  
13 October, what do we, 2020, what do we see at the  
14 Stigma-Free, Mankato meal counts?

15 A. Very similar to the previous week and similar to what we  
16 saw at Willmar with meals prepared, purported to be 3,000  
17 and number of kids served, looks like the lowest on this  
18 week was 2,992.

19 Q. Okay. And this kind of continues on and on, is that, is  
20 that right, every day after this?

21 A. Yes.

22 Q. 3,000 every day?

23 A. Yes.

24 Q. You said that was similar to the claims for the  
25 Stigma-Free, Willmar site; is that right?

1 A. Correct.

2 Q. Could you describe that? What do you mean by that?

3 A. Specifically, the Willmar and the Mankato, the very  
4 first day, that 10/19/2020 --

5 Q. Mm-hmm.

6 A. -- it's like in the 2700 range as far as purported  
7 meals, and then goes up to 3,000. Also, the similarities  
8 between the two is they, for the most part, they never seem  
9 to serve under 2,990 meals a day.

10 Q. Always within a handful of the maximum?

11 A. Yes.

12 Q. Okay. I'm showing you now on the screen on the left  
13 side of the screen, Government Exhibit H5, which is the  
14 exhibit we were just looking at, the email on December 30th,  
15 2020, containing the Stigma-Free, Mankato claims for  
16 October/November of 2020; is that right?

17 A. Correct.

18 Q. And on the right side is an email sent that same day  
19 containing the meal counts for the Stigma-Free, Willmar site  
20 for October and November of 2020; is that right?

21 A. Correct.

22 Q. Could you -- well, who were the emails sent from, both  
23 emails?

24 A. Abdikadir Mohamud sent them both and he sent them to  
25 both Eidleh at his Feeding Our Future inbox and the claims

1 at Feeding Our Future inbox.

2 Q. And what day were the two emails sent on?

3 A. December 30th, 2020, both of them, approximately two  
4 minutes apart.

5 Q. Okay. And you mentioned that the claims are similar. I  
6 want to walk you through here.

7 On the left we see the Stigma-Free, Mankato  
8 claims; is that right?

9 A. Yes.

10 Q. It looks like they start at 2700 and go up to 3,000 by  
11 the end of the week; is that right?

12 A. Correct.

13 Q. And then on the right we see the Stigma-Free, Willmar  
14 claims, and what do we see in terms of the pattern?

15 A. Same thing. They start at 2700, and they jump up to  
16 3,000.

17 Q. And after that first week, what do we see for each of  
18 these two sites in terms of the claims? Like for example  
19 here on page 4 of Government Exhibit H5, and page 5 of  
20 Government Exhibit G6, these are the claims for  
21 November 1st, 2020; is that right?

22 A. Correct.

23 Q. How would you compare them between the two sites?

24 A. They both have 3,000 as the number of meals prepared,  
25 and they both purport to serve at least 2,990 kids each day.

1 Q. Okay. Is that a pattern you see throughout these two  
2 sites?

3 A. Yes.

4 Q. Generally describe what you see how these two sites  
5 Stigma-Free, Willmar and Stigma-Free, Mankato operated in  
6 terms of the claims in the paperwork you've seen?

7 A. Basically the same number as displayed here, the same  
8 number of kids purportedly served, the same dates.

9 Q. Okay. Inspector Western, I want to follow the trail  
10 here because these claims were emailed to Feeding Our  
11 Future, correct?

12 A. Correct.

13 Q. We talked before about the search warrant that was  
14 executed at Feeding Our Future's offices.

15 A. Correct.

16 Q. That was in January of 2022, correct?

17 A. Yes.

18 Q. During that site, I know you talked this morning about  
19 folders that were recovered that were the meal counts and  
20 materials related to the Stigma-Free, Willmar site; is that  
21 right?

22 A. That's right.

23 Q. Did agents also recover similar folders related to the  
24 Stigma-Free, Mankato site?

25 A. Yes.

1 Q. I want to -- many of those have been admitted into  
2 evidence; is that correct?

3 A. Yes.

4 Q. I'm going to show you now what's been admitted into  
5 evidence as Government Exhibit H42.

6 Inspector, is this a Government Exhibit H42, is  
7 this one of the folders that was recovered during the search  
8 of Feeding Our Future's office?

9 A. Yes.

10 Q. And what is contained in this folder?

11 A. Stigma-Free, Mankato FY2020 October documents.

12 Q. FY being fiscal year?

13 A. Yeah.

14 Q. And on page 2 there's a monthly claim packet for  
15 Stigma-Free, Willmar?

16 A. Yes.

17 Q. For October 2020? And then starting on page 3, what do  
18 we see?

19 A. We see the meal counts.

20 Q. The ones that had been emailed in to Feeding Our Future?

21 A. Yes.

22 Q. All right. That's the -- there's 11 pages in that  
23 exhibit; is that correct?

24 A. Yes.

25 Q. Okay. Okay. I'm showing you now Government

1 Exhibit H43, which is in evidence.

2 Is this another folder that was recovered during  
3 the search of Stigma-Free, Mankato?

4 A. Yes.

5 Q. What month is this for?

6 A. November of 2020.

7 Q. Okay. And what do we find inside this folder?

8 A. More meal counts.

9 Q. For the Stigma-Free, Mankato site?

10 A. Yes.

11 Q. Sponsored by?

12 A. Feeding Our Future.

13 Q. Okay. Email address?

14 A. Aimee@feedingourfuturemn.org.

15 Q. Do you recognize that email?

16 A. Yeah, Ms. Bock's.

17 Q. Okay. I'm just walking through. There's more of these  
18 meal counts in there; is that right?

19 A. Yes.

20 Q. Just walking through the contents of that folder. So it  
21 looks like just under 3,000 a day; is that correct?

22 A. Yes.

23 Q. Seven days a week?

24 A. Yes.

25 Q. Okay. So those counts were emailed by Abdikadir Mohamud

1 to Feeding Our Future, correct?

2 A. Correct.

3 Q. They were recovered at Feeding Our Future. How do those  
4 meal counts relate to the claims actually submitted to the  
5 Minnesota Department of Education?

6 A. That's what they used to submit their monthly --

7 Q. Okay.

8 A. -- Feeding Our Future submits their monthly counts.

9 Q. And we didn't go through it with all the Willmar counts  
10 this morning, and I don't want to go through every one here.  
11 But by and large during the investigation, did you find that  
12 these meal counts formed the basis for claims that were  
13 actually submitted to Feeding Our Future?

14 A. Yes.

15 Q. Okay. I'm going to show you an example here, which has  
16 been admitted as Government Exhibit V19.

17 And this is a document from the CLiCS system. Are  
18 you familiar with the CLiCS system?

19 A. A little bit, yeah.

20 Q. Generally, what is it?

21 A. It's the system that they used to enter in the number of  
22 days served and the total number of meals.

23 Q. These are the actual claims for Federal Child Nutrition  
24 Program fund reimbursements?

25 A. Yes.

1 Q. And this one here, Government Exhibit V19, what's the  
2 site for which this, these claims relate?

3 A. Stigma-Free International, Mankato.

4 Q. Okay. And the sponsor?

5 A. Feeding Our Future.

6 Q. And what month and year is this?

7 A. November of 2020.

8 Q. Okay. And then we see here, you have to do some math  
9 here, Inspector, but looks like just under 60,000 breakfasts  
10 and just under 60,000 lunch for 20 days served; is that  
11 right?

12 A. Yes.

13 Q. 60,000 divided by 20, how many breakfasts and lunch is  
14 that a day?

15 A. Just under 3,000 a day.

16 Q. So that's those meal count forms put into CLiCS format;  
17 is that correct?

18 A. Correct.

19 Q. Okay. And the sponsor, Ms. Bock, submits these; is that  
20 right?

21 A. Correct.

22 Q. And each time she does, she -- there's a sponsoring  
23 authority certification; is that right?

24 A. Yes.

25 Q. Could you read that for the jury, please?

1 A. Sure.

2 "I hereby full responsibility for ensuring that  
3 this claim accurately represents the number of meals/milks  
4 served by a reimbursement category, that records are all  
5 available to support this claim, that this claim is in  
6 accordance with the program agreement, and that payment  
7 therefore has not been received. I understand that this  
8 information is being given in connection with the receipt of  
9 federal funds, that officials of the U.S. Department of  
10 Agriculture and the Minnesota Department of Education may  
11 verify this information and that deliberate  
12 misrepresentation may subject me to prosecution under  
13 applicable state and federal criminal statutes."

14 Q. Does that certification have to be made for each month's  
15 claims?

16 A. Yes.

17 Q. That's true of the Stigma-Free, Mankato site?

18 A. Yes. Yes.

19 Q. And in fact each month here, if we page through  
20 Government Exhibit V19, we see that, correct?

21 A. Correct.

22 Q. And all these claims are based on the meal count forms  
23 that we've looked at?

24 A. Yes.

25 Q. Similarly, did you see a certification like that for the

1 Stigma-Free, Willmar site?

2 A. Yes.

3 Q. Are all of those claims in the CLiCS system that are in  
4 evidence based on the meal count forms that we looked at  
5 this morning?

6 A. Yes.

7 Q. Thank you.

8 All right. I show you now what's been admitted as  
9 Government Exhibit H44. Is this another of the files that  
10 was recovered during the search of Feeding Our Future?

11 A. Yes.

12 Q. Stigma-Free, Mankato?

13 A. Yes.

14 Q. For the month of November 2020?

15 A. Correct.

16 Q. And what do we see here at page 2?

17 A. More meal counts.

18 Q. These are the same ones we saw before; is that right?

19 A. Yes.

20 Q. Did the meal counts fluctuate at all?

21 A. Very little.

22 Q. Even Thanksgiving?

23 A. Correct.

24 Q. Showing you now Government Exhibit H45. What do we see  
25 here?

1 A. That's December 2020's documentation.

2 Q. For Stigma-Free -- I got the wrong stack here. Hold on.

3 That was for Willmar. We won't go back, unless  
4 you want to.

5 A. No.

6 Q. Okay. H46, is this a folder recovered from Feeding Our  
7 Future?

8 A. Yes.

9 Q. What do we see? What month is this for?

10 A. It was January 2021 for Stigma-Free, Mankato.

11 Q. And it looks here, there's a sheet. It looks like it's  
12 numbered 1 through 31, and then there's a column B and  
13 column L. What do we see here?

14 A. 1 through 31 is the days of the months, and B is for  
15 breakfast. L is for lunch, and those are the numbers of  
16 breakfast and lunches served that month.

17 Q. Looks like the fluctuation is from between 2990 and  
18 2998; is that right?

19 A. Looks to be correct.

20 Q. All right. Page 4 here we see the actual meal count  
21 forms; is that right?

22 A. Yes.

23 Q. For the Stigma-Free, Mankato site?

24 A. Yes.

25 Q. And is that similar to what we saw before, both of the

1 Mankato counts and then the Willmar site?

2 A. Correct.

3 Q. Does that trend of essentially 3,000 a day continue into  
4 February of 2021?

5 A. Yes.

6 Q. I'm showing you the Government Exhibit H47, which is a  
7 folder recovered from Feeding Our Future during the search  
8 warrant, titled Fiscal Year 21, Feb, Stigma-Free, Mankato;  
9 is that right?

10 A. Yes.

11 Q. And what do we see here starting at page 2?

12 A. More meal count sheets starting the week of  
13 February 1st.

14 Q. Breakfast and lunch?

15 A. Yes.

16 Q. Same numbers, essentially?

17 A. Yes.

18 Q. 3,000 a day?

19 A. Correct.

20 Q. Government Exhibit H48 is the folder recovered from  
21 Feeding Our Future showing the Stigma-Free, Mankato meal  
22 counts for March of 2021; is that right?

23 A. Correct.

24 Q. What do we see in terms of the counts?

25 A. Same thing. Purported counts of children served

1 hovering right around 3,000.

2 Q. Government Exhibit H49 is a folder titled Horseed; is  
3 that right?

4 A. Yes.

5 Q. And again, what's Horseed?

6 A. Horseed's the vendor company.

7 Q. And what's inside of the folder marked Horseed that's  
8 been admitted as Government Exhibit H49?

9 A. Meal counts from March 1st for Stigma-Free, Mankato.

10 Q. March 2021?

11 A. Yes.

12 Q. How would you describe them compared to the other ones?

13 A. They look very similar, still number of kids purported  
14 to be served, right above 2,990.

15 Q. Is there ever -- we talked about Willmar this morning,  
16 and there was never a day that was off, like there was never  
17 shut down for a day?

18 A. No.

19 Q. There was never a day where the claims were  
20 significantly lower.

21 You've reviewed the meal counts and the claims for  
22 Stigma-Free, Mankato, correct?

23 A. Yes.

24 Q. What did you find with respect to whether or not the  
25 site was ever down or they ever went significantly below the

1 maximum?

2 A. Same thing with Willmar. There was never a day skipped  
3 due to snowstorm or anything like that. They kept going  
4 every day.

5 Q. They submitted Federal Child Nutrition Program fund  
6 reimbursement claims every single day?

7 A. Yes.

8 Q. H50 here, Government Exhibit H50 is another folder  
9 recovered from Feeding Our Future; is that right?

10 A. Yes.

11 Q. For April 2021, Stigma-Free, Mankato?

12 A. Correct.

13 Q. And what do we see here starting at page 4?

14 A. Meal counts, Stigma-Free, Mankato. This one is for the  
15 week of April 25th. Same thing, the number of kids served  
16 hovering just below 3,000.

17 Q. Okay. One second.

18 Inspector Western, you talked a little bit about  
19 the size of Mankato as a city, correct?

20 A. Yeah.

21 Q. I'm curious how this claim of 3,000 breakfasts and lunch  
22 served to kids at the Stigma-Free, Mankato site, how does  
23 that compare to the total enrollment at the Mankato Area  
24 Public School District?

25 A. It's, well, it's a little less than half.

1 Q. Okay.

2 A. Total enrollment is 8,000, and this is just under 3,000.

3 Q. Okay. And this site, where was it purportedly located  
4 the, the Stigma-Free, Mankato site?

5 A. Originally it was at 1415 First Avenue.

6 Q. What was that?

7 A. It was like a multiple unit, almost like an old  
8 warehouse that had been converted by somebody to, to suites,  
9 small little suites.

10 Q. What kind of suites? Like restaurant suites?

11 A. No. Like little offices that maybe an accountant or  
12 someone would have, like the single person offices, small.

13 Q. Okay. Is it a daycare? Did it appear to be used for a  
14 daycare or anything like that?

15 A. Didn't appear to be to me.

16 Q. Okay. You said it was originally located at that  
17 location. Did that change at some point?

18 A. Yeah, that's the address that was on the application.  
19 Yeah, then it, then it used the address 503 Belgrade in  
20 Mankato.

21 Q. And what kind of -- what's located at 503 Belgrade?

22 A. That is a, it's been historically been a restaurant  
23 there, several different types of restaurants throughout its  
24 history and still got the bones of a restaurant.

25 Q. At that point what was it called?

1 A. It was called J's Sambusa.

2 Q. Okay. I'm going to show you what's been marked as  
3 Government Exhibit H30, but not yet admitted.

4 Is that a picture of J's Sambusa?

5 A. Correct.

6 MR. THOMPSON: Your Honor, I move to admit  
7 Government Exhibit H30.

8 THE COURT: Any objection?

9 MR. UDOIBOK: No objection.

10 MR. COLICH: No objection.

11 THE COURT: H30 is admitted.

12 BY MR. THOMPSON:

13 Q. All right. Inspector Western, can you just describe  
14 what we're looking at here for the jury?

15 A. Yeah, that's a picture of the building located at 503  
16 Belgrade that was at one time J's Sambusa.

17 Q. You say, "At one time." What do you mean?

18 A. It no longer -- it ceased to exist as a restaurant  
19 starting in about October or November 2020. They went out  
20 of business.

21 Q. COVID?

22 A. COVID.

23 Q. Okay. How big is this restaurant? It looks --

24 A. You see the part with the blue awning, that's the bones  
25 of that restaurant, the square footage. Then if you look to

1 the right where you get sort of a beige colored building --

2 Q. Mm-hmm.

3 A. -- that's a separate suite that another catering  
4 business uses.

5 Q. Separate location?

6 A. Separate location.

7 Q. Unrelated to --

8 A. Unrelated, yeah. I am just trying to give just the  
9 square footage, kind of.

10 Q. Okay. All right. So let's look at Government  
11 Exhibit H51, which I believe are the meal counts for June of  
12 2021 at this site here we're just looking at.

13 And is this a folder that was also recovered  
14 during the search of Feeding Our Future?

15 A. Yes.

16 Q. FY21 Stigma-Free, Mankato June?

17 A. Correct.

18 Q. It says on page 2, there's a little sticky that says  
19 "missing receipts"; is that right?

20 A. Yes.

21 Q. And then at page 3 here on page 6, what do we see on  
22 page 6 of Government Exhibit H51?

23 A. Page 6 is another meal count for Stigma-Free, Mankato  
24 for the week of June 20th, June 20th, 2021.

25 Q. Okay. And what do we see here in June of 2021?

1 A. The number of meals prepared, purportedly prepared,  
2 prepared is now at 2,000, and the number of children served  
3 is just below 2,000 daily.

4 Q. So used to be 3,000. Now it's 2,000 starting in June of  
5 2021?

6 A. Correct.

7 Q. Was there a similar change with respect to the meal  
8 counts in June of 2021 for the Stigma-Free, Willmar site?

9 A. Yes, there was.

10 Q. Can you describe the similarities, if any?

11 A. Went, around the same time, it went from 3,000 daily  
12 prepared to 2,000.

13 Q. And if we look through June, the numbers stay the same.  
14 2,000 a day; is that correct?

15 A. Correct.

16 Q. And the name as a supervisor, that box is filled in on  
17 some but not all of the counts; is that right?

18 A. Yeah.

19 Q. For this one, whose name appears as the supervisor for  
20 the site?

21 A. Abdinasir Abshir, the owner of Horseed.

22 Q. All right. And Government Exhibit H52 is up on the  
23 screen now. This is another folder of documents recovered  
24 during the search of Feeding Our Future; is that right?

25 A. Correct.

1 Q. And this is for the Stigma-Free, Mankato counts for July  
2 of 2021; is that right?

3 A. That's right.

4 Q. And what do we see here at page 3?

5 A. Another meal count for Stigma-Free, Mankato starting  
6 with the week of July 1st, 2021.

7 Q. Okay. And how would you describe the meal counts in  
8 July of 2021 at the Stigma-Free, Mankato site?

9 A. Again, inflated and hard to believe.

10 Q. Why do you say that?

11 A. Again, just like Willmar in the previous months, 2,000  
12 prepared and never, never going below like 10, more than 11  
13 kids not getting meals from --

14 Q. Okay. I'm going to show you now Government Exhibit H53.  
15 What is on the screen here?

16 A. This is a folder for Stigma-Free, Mankato for August of  
17 2021.

18 Q. Okay. If I page through here, what do we see in terms  
19 of the meal counts for August 2021 for the Stigma-Free,  
20 Mankato count or site?

21 A. Again, same thing. Starting August 1st, 2021,  
22 purporting to prepare 2,000 a day and serve just under 2,000  
23 children a day.

24 Q. Page 8?

25 A. Similarly, that's the following week, the week of

1 August 8th, 2021.

2 Q. Page 9?

3 A. Again, similar to the other two. This is the week  
4 beginning August 15th, 2021.

5 Q. And it just continues like that day after day; is that  
6 correct?

7 A. Correct.

8 Q. Okay. I want to direct your attention up here. There's  
9 an invoice in this folder for Stigma-Free, Mankato in August  
10 of 2021; is that right?

11 A. Yes.

12 Q. And that's at page 4 of Government Exhibit H53?

13 A. Yes.

14 Q. Could you describe the invoice that's on the screen for  
15 us?

16 A. Yeah. This is an invoice from Safari Restaurant billing  
17 Feeding Our Future, and it looks like it's on behalf of  
18 Stigma-Free, Mankato. And it's for daily breakfast and  
19 lunches for the month of August 2021.

20 Q. And how many, how much is Safari Restaurant billing  
21 Feeding Our Future for serving breakfast and lunch at the  
22 Stigma-Free, Mankato site in August of 2021?

23 A. Per day, \$14,220.

24 Q. Okay. And I'm going to show that on the left side of  
25 the screen. Okay?

1 A. Okay.

2 Q. And what's the total amount that Safari Restaurant  
3 billed to Feeding Our Future for providing 2,000 breakfasts  
4 and 2,000 lunches at the Stigma-Free, Mankato site in August  
5 of 2021?

6 A. \$440,820.

7 Q. In Federal Child Nutrition Program funds?

8 A. Correct.

9 Q. I'm going to, on the right side of the screen, I'm going  
10 to direct your attention to a similar folder that was  
11 recovered during the search of Feeding Our Future related to  
12 the Stigma-Free, Willmar site. Okay?

13 A. Sure.

14 Q. And this is a folder also for August of 2021. Just like  
15 the one on the left. Okay?

16 A. I can see that, yep.

17 Q. And if we see here, on the right side of the screen,  
18 what do we find in the Stigma-Free, Willmar folder at  
19 Feeding Our Future for August of 2021?

20 A. Find an invoice from Safari Restaurant to Feeding Our  
21 Future that looks number-wise, dollar-wise, quantity-wise,  
22 identical to the Mankato one.

23 Q. So it's billing for serving 2,000 breakfasts and 2,000  
24 lunches every day, all 31 days of August 2021?

25 A. Correct.

1 Q. At the Stigma-Free, Willmar site?

2 A. Yes.

3 Q. How much is Safari Restaurant billing to Feeding Our  
4 Future every day for doing so?

5 A. Daily? It's the same as Mankato. \$14,220 a day.

6 Q. And what's the total amount that Safari Restaurant,  
7 Mr. Salim Said's restaurant, bills Feeding Our Future for  
8 providing those meals in August of 2021 at the Stigma-Free,  
9 Willmar site?

10 A. \$440,820.

11 Q. And how does that compare, if you look on the left side  
12 of the screen, to the amount that Salim Said's company,  
13 Safari Restaurant, billed?

14 A. Exactly the same.

15 Q. For the Stigma-Free, Mankato site?

16 A. Correct.

17 Q. \$440,820?

18 A. Yep.

19 Q. So how much all told did Safari Restaurant, Mr. Said's  
20 company, bill to the Federal Child Nutrition Program funds  
21 for providing meals at the Stigma-Free, Mankato and  
22 Stigma-Free, Willmar sites in the one month of August of  
23 2021?

24 A. It looks like 880,000 and change.

25 Q. 880,000 -- more than \$880,000?

1 A. More than \$880,000, yep.

2 Q. I'm showing you now what's been admitted as Government  
3 Exhibit H54, which is another folder recovered during the  
4 search of Feeding Our Future; is that right?

5 A. Yes.

6 Q. And this is Stigma-Free, Mankato for September of 2021;  
7 is that right?

8 A. Correct.

9 Q. And there's another invoice here on page 3; is that  
10 right?

11 A. Yes.

12 Q. And it's from Mankato Stigma-Free at that 503 Belgrade  
13 Avenue address?

14 A. Yes.

15 Q. Is that the one we looked at before?

16 A. Yes.

17 Q. And it's billed to Feeding Our Future?

18 A. Correct.

19 Q. How much is being billed each day, approximately?

20 A. With the exception of one day down there, it looks like  
21 over 10,000.

22 Q. Looks like maybe there's a typo --

23 A. Correct.

24 Q. -- on September 23rd; is that right?

25 A. Looks like it to me.

1 Q. Expensive typo?

2 A. Yes.

3 Q. What's the total amount billed for this site in  
4 September of 2021?

5 A. \$227,223.15.

6 Q. Safari Restaurant also bills, looks like they submitted  
7 an invoice here for purportedly providing some meals during  
8 the first seven days or so of September 2021; is that right?

9 A. Yes.

10 Q. Could you describe the nature of this invoice?

11 A. Yeah. It's from Safari Restaurant billing Feeding Our  
12 Future for meals served at Stigma-Free, Mankato for the  
13 first seven days of September 2021, 2,000 meals a day.

14 Q. And what's -- 2,000 breakfasts and 2,000 lunch?

15 A. Correct.

16 Q. What's the total amount billed each day?

17 A. \$14,220 each day.

18 Q. For a total of just under a hundred thousand dollars in  
19 that seven-day period?

20 A. Yes.

21 Q. And there are meal count sheets in support, for lack of  
22 a better term, of these claims; is that right?

23 A. Yes.

24 Q. Starting at page 7 here, could you describe the meal  
25 count sheet that we see for the week of September 8th of

1 2021?

2 A. Yes. This is meal count sheet for Stigma-Free, Mankato.  
3 Sponsor is Feeding Our Future. This is starting the week of  
4 September 8th, starting on the Wednesday.

5 Q. Okay. And this continues on at the same amount  
6 throughout the month of September?

7 A. Yes.

8 Q. Okay. And then there's a roster starting at page 11 of  
9 Government Exhibit H54; is that right?

10 A. Yes.

11 Q. Now, you talked earlier about some investigation that  
12 the team did with respect to the attendance roster submitted  
13 in support of the Stigma-Free, Willmar claims; is that  
14 right?

15 A. Right.

16 Q. Was there a similar analysis or investigation done with  
17 respect to the rosters submitted in support of the  
18 Stigma-Free, Mankato claims?

19 A. Yes.

20 Q. Could you describe what was done?

21 A. Same thing. These, these, this roster was compared to  
22 the, to the full roster of the Mankato School District to  
23 determine how many people from this roster were on the  
24 school district roster.

25 And it was like a little over a hundred, maybe,

1 out of 8,000.

2 Q. Okay. And one of your colleagues did this analysis; is  
3 that right?

4 A. Correct.

5 Q. And he'll be up to talk more about it later in the  
6 trial?

7 A. Yes.

8 Q. Okay. All right. I'm showing you now Government  
9 Exhibit H55, another folder recovered during the search of  
10 Feeding Our Future; is that right?

11 A. Yes.

12 Q. What month is this for?

13 A. November 2021.

14 Q. And which site?

15 A. Stigma-Free, Mankato.

16 Q. Directing your attention to page 2, could you generally  
17 describe the claims that were submitted for the Stigma-Free,  
18 Mankato site in the month of November 2021?

19 A. Yeah, purported to prepare 2,000 meals and purported to  
20 serve just under 2,000 children a day.

21 Q. Showing you now what's been admitted as Government  
22 Exhibit H56. Is this another folder recovered during the  
23 search of Feeding Our Future?

24 A. Yes.

25 Q. For the month of December 2021?

1 A. Yes.

2 Q. Which site?

3 A. Stigma-Free, Mankato.

4 Q. Okay. And directing your attention starting at the  
5 second page, what do we see in terms of the claims that were  
6 submitted on behalf of the site in December of 2021?

7 A. Same thing. 2,000 meals prepared and purported to serve  
8 to just under 2,000 kids.

9 Q. Okay. Okay. Now we talked earlier about how the  
10 Stigma-Free, Willmar claims were submitted to Feeding Our  
11 Future. How were the Stigma-Free, Mankato claims typically  
12 submitted?

13 A. The same way.

14 Q. Via email?

15 A. Yes.

16 Q. Okay. I'm going to show you one that's been marked but  
17 not yet admitted as Government Exhibit H7, H as in horse.

18 Is this an email from Ahmed Artan to Feeding Our  
19 Future on February 28th of 2021?

20 A. Yes.

21 Q. Containing some meal counts?

22 A. Yes.

23 MR. THOMPSON: Your Honor, I move to admit  
24 Government Exhibit H7.

25 THE COURT: Any objection?

1 MR. UDOIBOK: No.

2 MR. COLICH: No objection, Your Honor.

3 THE COURT: H7 is admitted and may be published.

4 BY MR. THOMPSON:

5 Q. Inspector Western, can you just describe this email for  
6 the record?

7 A. Yeah, it's an email from Ahmed Artan to the claims email  
8 at Feeding Our Future. Copied is Eidleh, an employee of  
9 Feeding Our Future. Sent on February 28th, 2021. Subject:  
10 February 2021 Claims for Stigma-Free, Mankato.

11 Q. Okay. And attached to this email there are, some of the  
12 meal count forms we looked at earlier?

13 A. Yes.

14 Q. For which month?

15 A. February.

16 Q. Of 2021?

17 A. Yes.

18 Q. Okay. Now you said that there was some similarities  
19 between the Stigma-Free, Willmar and Mankato site; is that  
20 right?

21 A. Yes.

22 Q. Did that include with respect to the timing in which the  
23 counts were submitted?

24 A. Yeah, often submitted together.

25 Q. All right. I'm showing you on the right a different

1 Government Exhibit G8; is that right?

2 A. Yes.

3 Q. Can you describe that exhibit for us? It's already in  
4 evidence.

5 A. Similar to the one on the left, this is an email from  
6 Ahmed Artan to the claims email inbox at Feeding Our Future,  
7 with Eidleh copied. And it's the February 2021 claims for  
8 Stigma-Free, Willmar, submitted on February 28th, 2021,  
9 two minutes after the Mankato one.

10 Q. And what do we see in terms of the claims as we page  
11 through them of the meal counts that are attached to these  
12 two emails, Government's Exhibits H7 and G8?

13 A. Can you repeat that?

14 Q. How would you describe the counts that are attached to  
15 these two emails that Mr. Artan submitted on February?

16 A. Very, very similar.

17 Q. Very similar?

18 A. Yeah.

19 Q. 3,000 a day for each site?

20 A. Yep.

21 Q. I'm showing you now what's been admitted or what's been  
22 marked but not yet admitted as Government Exhibit H14.

23 Is this another email submitting claims for the  
24 Stigma-Free, Mankato site?

25 A. Yes.

1 Q. Specifically, sent on April 1st of 2021?

2 A. Correct.

3 MR. THOMPSON: Your Honor, I move to admit  
4 Government Exhibit H14.

5 THE WITNESS: Any objection?

6 MR. UDOIBOK: No objection.

7 MR. COLICH: No.

8 THE COURT: H14 is admitted and may be published.

9 MR. THOMPSON: Thank you, Your Honor.

10 BY MR. THOMPSON:

11 Q. All right. Inspector Western, could you just describe  
12 this email for us quick?

13 A. Yeah. This is an email from the Stigma-Free gmail  
14 account to the claims at Feeding Our Future inbox and  
15 Eidleh's Feeding Our Future inbox.

16 The subject is March 2021 Claims for Stigma-Free,  
17 Mankato, Horseed Management. And it's emailed on April 1st,  
18 2021, at about 8:32 p.m.

19 Q. Were there claims also submitted on behalf of the  
20 Stigma-Free, Willmar site that same day, April 1st, 2021?

21 A. Yes.

22 Q. And I'm showing you on the right side of the screen  
23 Government Exhibit G12. Is that the similar claims  
24 submission or meal count submission for the Stigma-Free,  
25 Willmar site?

1 A. Correct.

2 Q. Tunyar Trading?

3 All right. When are the two emails sent?

4 A. One minute apart on April 1st, 2021.

5 Q. Both from that same email address

6 stigma-freemn1@gmail.com?

7 A. Yep.

8 Q. Both unsigned?

9 A. Correct.

10 Q. And if I page down to the first page of the attachment  
11 of each exhibit, what do we see in terms of the claims that  
12 were submitted or the meal counts?

13 A. Very similar again.

14 Q. 3,000 a day for both sites?

15 A. Yes.

16 Q. Stigma-Free, Mankato on the left. Stigma-Free, Willmar  
17 on the right.

18 A. Correct.

19 Q. Sent on the same day?

20 A. Yep.

21 Q. Okay. One more, I think, Inspector. No more.

22 And, Inspector Western, all told, how many meals  
23 did the defendants claim to have served at the Stigma-Free,  
24 Mankato site between October 2020 and December 2021?

25 A. 1.6 million.

1 Q. How does that compare to the amount of meals, the number  
2 of meals purportedly served at the Stigma-Free, Willmar  
3 site?

4 A. Basically the same amount.

5 Q. And how much in Federal Child Nutrition Program funds  
6 reimbursements did they claim to be entitled to and receive  
7 through Feeding Our Future for meals purportedly served at  
8 the Stigma-Free, Mankato site?

9 A. 5.2 million.

10 Q. And how does that compare to the amount that they  
11 received for meals purportedly served at the Stigma-Free,  
12 Willmar site?

13 A. Nearly the same amount.

14 Q. Thank you.

15 Now, Inspector, there's actually other Stigma-Free  
16 sites that were opened at other locations of the state?

17 A. Correct.

18 Q. One of your colleagues will be here to testify about  
19 those sites at some other time?

20 A. Yes.

21 MR. THOMPSON: Thank you. Nothing further for  
22 this witness, Your Honor.

23 THE COURT: Mr. Udoibok, cross-examination.

24 MR. UDOIBOK: Yes, Your Honor. May I approach?

25 **(Sidebar discussion)**

1 THE COURT: Mr. Udoibok.

2 MR. UDOIBOK: Yes. Can you hear me?

3 THE COURT: I can.

4 MR. UDOIBOK: Your Honor, I'm sorry. I have to go  
5 to the bathroom.

6 THE COURT: No worries.

7 **(In open court)**

8 THE COURT: We're going to take a brief break. We  
9 will take another one later this afternoon. So let's just  
10 take a ten-minute break at this time. So we will come back  
11 at 2:15.

12 All rise for the jury.

13 2:06 p.m.

14 **IN OPEN COURT**

15 **(JURY NOT PRESENT)**

16 THE COURT: We're in recess for ten minutes.

17 Thanks, everyone.

18 (Recess taken at 2:06 p.m. till 2:17 p.m.)

19 2:17 p.m.

20 **IN OPEN COURT**

21 **(JURY PRESENT)**

22 THE COURT: You may all be seated.

23 And, Mr. Udoibok, you may inquire.

24 MR. UDOIBOK: Thank you, Your Honor.

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CROSS-EXAMINATION

BY MR. UDOIBOK:

Q. Mr. Western, my name is Kenneth Udoibok, and I represent Aimee Bock, who is seated next to my paralegal, Ms. Mallet.

I'm going to jump around a bit, and I hope not to take the same amount of time that the government used.

When did you start your investigation in this case?

A. Me personally or the government?

Q. You.

A. I got on the case probably late in 2021.

Q. Late 2021?

A. Yeah.

Q. November, October, or December?

A. I'd have to guess. I'm not sure.

Q. All right. So you would say the fall?

A. Fall, sure.

Q. All right. And where did you acquire your information about Feeding Our Future?

A. The FBI.

Q. All right. So you were not part of the execution of the search warrant at the Feeding Our Future building?

A. That particular site, no.

Q. All right. So you acquired knowledge of the photos you had testified to after the search warrant had been executed,

1 right?

2 A. Correct.

3 Q. And you just, you viewed them and formed your opinion  
4 about the nature of the evidence at Feeding Our Future,  
5 correct?

6 A. Sure.

7 Q. So you don't know how the boxes were located at Feeding  
8 Our Future for the government to acquire this information?

9 A. No, I don't know -- the boxes taken from the search  
10 site?

11 Q. Yes.

12 A. No. I just know they were taken.

13 Q. So you can't tell me whether the boxes, the photos were  
14 organized in such ways for you to form an impression or  
15 opinion about Stigma-Free or Mankato, Willmar or Mankato?

16 A. Can you repeat that?

17 Q. I will try.

18 A. Okay.

19 Q. So if you look at -- why don't you just --

20 Ms. Mallet, please call up C3.

21 Just for an example. All right. This is an email  
22 that you testified to earlier from Mr. Ahmed to Mr. Said,  
23 correct?

24 A. Sure. Yeah.

25 Q. All right. So you couldn't tell me where at Feeding Our

1 Future that this email come from, can you?

2 A. I personally couldn't, but I am sure someone could.

3 Q. I just want to know how much you do know.

4 Now, let's just walk through this Exhibit C3.

5 A. Okay.

6 Q. Ms. Mallet, just scroll down page by page and I will  
7 tell you where to stop. Go to second page. All right. So  
8 go back to the other page.

9 That's -- oh, that's the first, that's the email.  
10 And there's an attachment to this email you testified to,  
11 correct?

12 A. Yeah, there's attachments on there. I see that.

13 Q. Why don't you go to the next page. Next one.

14 So this is, this is -- you testified to the fact  
15 that this is a certificate of incorporation, correct?

16 A. If I testified to that, yeah, that's what this is.  
17 Correct.

18 Q. Now, do you know whether or not this corporation had  
19 prior conversations with Feeding Our Future to scale up  
20 their production capabilities? Do you have that information  
21 at all?

22 A. I'm unaware of any conversations they may have had.

23 Q. Do you know or not whether the corporation had any  
24 conversation with Feeding Our Future regarding production  
25 capability?

1 MR. THOMPSON: Objection. Asked and answered.

2 THE COURT: Sustained.

3 MR. UDOIBOK: All right.

4 BY MR. UDOIBOK:

5 Q. Your testimony regarding the newness of this corporation  
6 is not based on anything else other than this information  
7 records, correct?

8 A. As far as the date they incorporated?

9 Q. Yes.

10 A. Yes, it's based on this document.

11 Q. The fact that it was incorporated on this particular  
12 day, does that mean that there would be no other activity  
13 before the incorporation?

14 A. No, that doesn't mean that.

15 Q. Okay. Let's go to the next page.

16 This is also the documents regarding the formation  
17 of a corporation.

18 Go to the next page. Next one.

19 What is page 6 of this document? Is it the fees  
20 to the Secretary of State?

21 A. Yes, it looks like the registration fees.

22 Q. All right. Go to the next page. Next page.

23 What is that? Is that the Articles of  
24 Incorporation. You testified to this.

25 MR. THOMPSON: Your Honor, I object. He didn't

1 testify to this exhibit at all.

2 THE WITNESS: I don't recognize it. Yeah.

3 THE COURT: Sustained as to his prior testimony.

4 BY MR. UDOIBOK:

5 Q. All right. Let's go to the next page. Continue to  
6 scroll down, Ms. Mallet. Continue. Stop.

7 What is that?

8 A. This looks like a, something from the Internal Revenue  
9 Service related to ASA Limited.

10 Q. Ms. Mallet, why don't you call out the paragraph that  
11 starts with, "Thank you for applying."

12 What does that say?

13 A. "We assigned you" -- do you want me to read it?

14 Q. You can summarize.

15 A. Oh, it looks like they gave, the IRS gave them an  
16 employer identification number.

17 Q. All right.

18 A. Assigned one to them.

19 Q. Okay. Let's go to the next page. Continue to scroll.  
20 We want to go through some of these pages. Next.

21 What is that?

22 A. It looks like a registration request submission for --

23 Q. Is that the Minnesota Department of Revenue?

24 A. That's correct.

25 Q. All right. Next page.

1                   You testified to this. Do you recall?

2           A. I don't recall seeing this document.

3           Q. But what is this?

4           A. This looks like articles of organization from the  
5 Minnesota Secretary of State.

6           Q. All right. Next page. Continue to go.

7

8                   MS. MALLET: That's the last page.

9                   MR. UDOIBOK: That's the last page?

10           BY MR. UDOIBOK:

11           Q. Now Exhibit G3, is that a series of government records  
12 regarding application for corporate status and tax ID  
13 identification number?

14                   THE COURT: Counsel, this is C3?

15                   MR. UDOIBOK: I meant G3. Sorry.

16                   THE COURT: C3 is before the jury right now.

17                   MR. UDOIBOK: Yes. But that's -- that's regarding  
18 corporate application for --

19                   THE WITNESS: Yeah, this appears --

20           BY MR. UDOIBOK:

21           Q. Correct?

22           A. Apologize. This appears to be some sort of articles of  
23 organization --

24           Q. Okay.

25           A. -- paperwork.

1 Q. All right. So now let's go to, let's go to G3.

2 What is that?

3 A. That's an email from Aimee Bock to MDE.

4 Q. And then it's, it's regarding what?

5 A. It's regarding a site application for Stigma-Free  
6 International, Willmar.

7 Q. All right. There's about 26 pages of this document.  
8 There's some pages that I want to focus on.

9 Ms. Mallet, could you just pace it.

10 What is this second page?

11 A. It looks like an MDE submission verification for the  
12 Stigma-Free International, Willmar site.

13 Q. All right. So what are those check, checked boxes?

14 A. It looks like, it looks like they are checking off that  
15 they have --

16 Q. Ms. Mallet, would you call out, call out the five check  
17 boxes?

18 What is that?

19 A. To me it appears that they are checking off as soon as  
20 they receive those documentation to, that they have all  
21 their documents they need for the submission.

22 Q. All right. You see the signed agreement is checked?

23 A. Yeah, I do.

24 Q. And to the right of the signed agreement, do you see  
25 where it says, Not applicable roster with ABCs?

1 A. I do.

2 Q. Okay. What does that mean?

3 A. I have no idea.

4 Q. All right. Would you doubt that, that that application,  
5 all right, that a roster of attendance is not required?

6 MR. THOMPSON: Objection. Foundation.

7 THE COURT: Sustained.

8 BY MR. UDOIBOK:

9 Q. So you don't know whether a roster is required regarding  
10 when this application was made?

11 A. I know there was a time where rosters were required.

12 Q. In this exhibit you see, Not applicable, correct?

13 A. Yeah, if that's what that NA means.

14 Q. Okay. What about for-profit eligibility form? What  
15 does it say?

16 A. NA as well.

17 Q. Not applicable?

18 A. Sure.

19 Q. Meaning for-profit may not participate, correct?

20 A. Yeah, maybe.

21 Q. Okay. Next page.

22 What is this?

23 A. MDE Summer Food Service Program Submission Verification.

24 Q. This is further verification about the site  
25 identification, correct?

1 A. Yes.

2 Q. This a preoperational visit form, correct?

3 A. Oh, yes.

4 Q. Is the press release checked?

5 A. Yes.

6 Q. What does that mean, do you know?

7 MR. THOMPSON: Objection. Foundation.

8 THE COURT: Overruled. You may answer the "do you  
9 know."

10 THE WITNESS: Maybe they put some press release  
11 out.

12 BY MR. UDOIBOK:

13 Q. For people to know about the site, correct?

14 A. Perhaps.

15 Q. And there's a health department notification letter. Do  
16 you know what that is?

17 A. I don't know specifically what it is.

18 Q. Let's go to the next page.

19 What is this?

20 A. Pardon me?

21 Q. What is page 4?

22 A. Oh. Looks like it's the MDE site identification request  
23 form to add, change or look up a site number in the cyber  
24 linked interactive child nutrition system.

25 Q. So Feeding Our Future is communicating with MDE

1 regarding the site, correct?

2 A. Yes.

3 Q. And is the Stigma-Free, Willmar, correct?

4 A. Correct.

5 Q. All right. Next page.

6 And the contact person for Feeding Our Future is  
7 Ms. Bock, correct?

8 A. Yes.

9 Q. All right. Next page. What, what is this Child and  
10 Adult Care Food Program page, page 6?

11 A. That looks like it's an agreement between Feeding Our  
12 Future and a program, meaning -- perhaps meaning a site.

13 Q. All right. Go to the next page, please. And you see  
14 Ms. Bock. Ms. Mallet, would you call out the first box,  
15 please?

16 And the program is crossed out and Stigma-Free  
17 International, Willmar is written in, correct?

18 A. Correct.

19 Q. All right. Release and then call out, go to the next  
20 page. Go to the next page.

21 Now, I don't want to go through all the items.

22 A. Sure.

23 Q. Would you agree with me that this is a contract between  
24 Feeding Our Future and the Mankato Stigma-Free site?

25 A. Yes.

1 Q. All right. Let's go to the next page.

2 And do you see site eligibility documentation?

3 Ms. Mallet, would you call out that section,  
4 please.

5 A. Yes, I see that.

6 Q. What does the first, first paragraph there say?

7 A. Do you want me to read it?

8 Q. Please.

9 A. "Annually provide Feeding Our Future with program  
10 information for CACFP application purposes. Promptly inform  
11 Feeding Our Future of any changes in program operations  
12 including mealtimes, meal types, days of operation,  
13 unexpected closings, director, address, email addresses and  
14 tax status."

15 Q. What about the next, next paragraph? Next paragraph,  
16 sorry. 2?

17 A. Sure. "Provide the Feeding Our Future with a copy of  
18 current Minnesota Department of Human Services child care  
19 license or CACFP alternate approval documents for CACFP  
20 application purposes. Continue to provide updated license  
21 or alternative approval documents when changes occur in  
22 license capacity, expiration date, license type, or  
23 licensee."

24 Q. Okay. Call out Number 3.

25 Please read.

1 A. "Annually, and when new participants enroll, distribute  
2 or collect signed CACFP enrollment forms meeting CACFP  
3 requirements for each child or obtain enrollment information  
4 for Head Start children from a Head Start agency. Ensure  
5 that complete information is provided and send copies of  
6 completed enrollment forms to Feeding Our Future in a timely  
7 manner."

8 Q. Thank you.

9 Let's go to the next page. Call out meal service  
10 section.

11 Would you read seven please?

12 A. Sure.

13 "Prepare and serve meals that meet CACFP meal  
14 pattern and portion size requirements in 7 C.F.R. 226.20 for  
15 the ages served. Maintain dated menus for each meal  
16 service, including any substitutions or additions."

17 Q. Go to 11. Call out paragraph 11 and call that out, if  
18 you can.

19 Could you read that, please?

20 A. Sure.

21 "Maintain records for each fiscal year on site at  
22 program for three years after submission of the final claim  
23 for the fiscal year, including copies of records that have  
24 been submitted to Feeding Our Future. Provide records to  
25 Feeding Our Future as directed."

1 Q. Let's go to the next page, please. Call out authorized  
2 representatives section, please.

3 This Exhibit G3 was signed, correct?

4 A. Correct.

5 Q. And who are the signatories?

6 A. Ahmed Artan and Aimee Bock.

7 Q. All right. All right. Let's go to the next page.

8 What is this?

9 A. Sponsor preoperational visit to new sites Child and  
10 Adult Care Food Program --

11 Q. What does that mean?

12 A. -- form.

13 They go -- the sponsor visits the site before they  
14 let them go into operation.

15 Q. All right. Next page.

16 So they are check marks, right? And the first box  
17 has what?

18 A. It looks like the name of the vendor, whether they pick  
19 up or deliver, and then which meal or snack they are  
20 providing.

21 Q. Does that mean that for that site meals can be picked up  
22 and delivered?

23 A. It looks like only one's checked. So I'm assuming --

24 Q. Pickup?

25 A. -- pickup, yeah.

1 Q. Wait a minute. So it's center pickup, correct?

2 A. Appears to be.

3 Q. All right. Now let's go to the next page. So call out  
4 participant enrollment forms.

5 What does AS mean?

6 A. I have no idea.

7 Q. Okay. Go to the next page.

8 We have the box for for-profit eligibility. Call  
9 out that section.

10 There's an NA and then NP. Do you know what NP  
11 stands for?

12 A. I could guess that it's nonprofit.

13 Q. All right. Next page, please. Continue. Call out the  
14 approval section.

15 You testified earlier that the sponsor signature  
16 was Ms. Bock, correct?

17 A. It appears to me to be.

18 Q. Ms. Mallet, would you call out the first sponsor  
19 signature? The first sponsor signature. No. The next one.  
20 No. No. The middle one. The middle one. There you go.  
21 Pull it up.

22 And then call out the bottom signature. Put them  
23 side by side. Put them next to each other, if you can.

24 Are those the same signatures?

25 A. No.

1 Q. They are different, aren't they?

2 A. I think the sponsor signature in the black ink, I would  
3 guess that it's the person up above signing the wrong spot  
4 initially, and then Ms. Bock signed below in blue ink.

5 Q. You are guessing, aren't you?

6 A. Yeah.

7 Q. Thank you.

8 Next. Next page. Back up. Back up. Back up to  
9 the other page. Call out the signatures.

10 Do you, do you have any information that the  
11 middle signature is another Feeding Our Future employee?

12 A. No, I don't know if it is or not.

13 Q. Okay. Next page.

14 What is this page?

15 A. Looks like an MDE Summer Food Service Program sponsor  
16 preoperational site visit form.

17 Q. All right. Next page. Call out the signature section.

18 That signature section resembles the last, the  
19 third signature we saw?

20 A. Yes.

21 Q. All right. Ms. Mallet, could you go back and see  
22 whether you can -- I don't want -- I don't want to show out  
23 here.

24 But nonetheless, the last, the bottom signature is  
25 the same as this one, correct?

1 A. Yes.

2 Q. All right. She's been doing well. I don't want to make  
3 her --

4 Next. Next.

5 Now, what is this?

6 A. A Feeding Our Future license exempt verification.

7 Q. Okay. Next page.

8 What is that?

9 A. It looks like a map.

10 Q. Of the location of the site, correct?

11 A. Yeah, I believe so.

12 Q. All right. Next page. Call out the first paragraph.

13 You testified to this earlier. Is this the  
14 approval 501c3 status?

15 A. Correct.

16 Q. All right. Next page. That's the signature of the  
17 director. All right.

18 Next page?

19 A. There?

20 Q. Yes.

21 A. Okay.

22 Q. What is this?

23 A. Looks like it's a Feeding Our Future CACFP required  
24 elements and civil rights training sign-in sheet.

25 Q. That is nondiscriminatory training, correct?

1 A. Say that one more time.

2 Q. Nondiscrimination training?

3 A. Correct.

4 Q. So you can't discriminate based on age, sex, gender,  
5 disabilities, correct?

6 A. I don't know what it entails, but it's some sort of  
7 civil rights training, correct.

8 Q. Next page.

9 What is this?

10 A. Looks like, looks like it's their idea of a press  
11 release, maybe.

12 Q. Press release to varying, for publications, correct?

13 MR. THOMPSON: Objection. Foundation.

14 THE COURT: Sustained.

15 BY MR. UDOIBOK:

16 Q. But the first, that page, page 25 is a press release,  
17 correct?

18 A. It doesn't say "press release" on it.

19 Q. All right.

20 A. I don't know what it is.

21 Q. For immediate release?

22 A. Yeah.

23 Q. All right. Let's go to the next page.

24 What is this?

25 A. That looks like a letter from Feeding Our Future to

1 Kandiyohi County Health and Human Services.

2 Q. All right. So, Officer, we have gone through 26 pages  
3 of Exhibit G3.

4 A. Sure.

5 Q. Is that considered a site application?

6 A. Appears to be.

7 Q. And after this application, where, where does the  
8 application go?

9 A. They submit it to MDE.

10 Q. And they submit it to MDE for what? For approval,  
11 correct?

12 A. Correct.

13 Q. All right. And now you've gone through a series of meal  
14 counts. The meal counts that you've gone through with the  
15 government's attorney included -- we'll go through it later.

16 But just so we know, I don't want to go through  
17 all the exhibits for the sake of time, but you would agree  
18 with me that the meal counts were consistent with the  
19 approved site application by MDE?

20 A. No. I believe in the site applications they said the  
21 meals were supposed to be 500. That's what they applied  
22 for, as I recall.

23 Q. Well, let's, let's see. Let's go to G6. Maybe that  
24 will be helpful.

25 So what is this?

1 A. This is an email from Abdikadir Mohamud to Mr. Eidleh.

2 Q. All right. And there's an attachment, right?

3 A. Yeah.

4 Q. Let's go to the first, second page.

5 What is that?

6 A. It's a meal count sheet.

7 Q. And this meal count sheet is consistent with the  
8 contract that this site had with Feeding Our Future and  
9 approved by MDE, correct?

10 MR. THOMPSON: Objection. Compound and lack of  
11 foundation.

12 THE COURT: Sustained.

13 MR. UDOIBOK: I'll try it a different way.

14 BY MR. UDOIBOK:

15 Q. Can you point me, to make it easy, can you point me to a  
16 meal count that was submitted to Feeding Our Future in  
17 excess of the allocated number for the site?

18 A. I don't remember seeing an allocated number in the  
19 contracts.

20 Q. Were these meal counts approved or not?

21 A. Approved by Feeding Our Future.

22 Q. Were they approved by MDE?

23 A. They were paid by MDE.

24 Q. All right. Let's go to G39. See whatever we can find  
25 in the agreement.

1 I think I'm off, right? Am I off?

2 MS. MALLETT: G39?

3 MR. UDOIBOK: Yes.

4 Can you pull it up?

5 MR. THOMPSON: Yes.

6 MR. UDOIBOK: Mine is -- same thing. G39.

7 MR. THOMPSON: G39?

8 MR. UDOIBOK: This is G39.

9 MR. THOMPSON: Yeah.

10 BY MR. UDOIBOK:

11 Q. So this FaaFan restaurant, all right.

12 A. Yes.

13 Q. You testified that it was a Stigma-Free vendor, correct?

14 A. FaaFan --

15 Q. Yes. Yes, it was a Stigma-Free vendor?

16 A. It wasn't the vendor. Tunyar Trading was the vendor.

17 Q. Yeah. Tunyar Trading was the vendor.

18 All right. And was there any agreement at all for  
19 FaaFan Restaurant to produce food?

20 A. There may have been a verbal agreement to produce some  
21 food.

22 Q. All right.

23 A. And Tunyar would pay them rent.

24 Q. All right.

25 A. I don't know if there's a written one anywhere.

1 Q. Let's go to G1.

2 All right. So we establish that this is Tunyar  
3 Trading LLC, correct?

4 A. Correct.

5 Q. All right. And Tunyar Trading LLC is related to which  
6 organization now?

7 A. Well, it's -- you mean who opened it?

8 Q. Yes.

9 A. Mr. Mohamud.

10 Q. Okay.

11 A. Abdikadir Mohamud.

12 Q. Let's go to W11.

13 All right. This is a bank account, right, of  
14 which organization?

15 A. This is the bank account for Stigma-Free International.

16 Q. All right. And is that the account that moneys were  
17 paid into by Feeding Our Future?

18 A. Yes.

19 Q. Okay. And was that account the for-profit account or  
20 nonprofit account?

21 A. This was the, this bank account belonged to the original  
22 nonprofit Stigma-Free.

23 Q. Okay. All right. Let's go to B63.

24 All right.

25 (Counsel confer)

1 MR. THOMPSON: G3, page 18.

2 MR. UDOIBOK: Page 18.

3 All right. So this is the part of the document  
4 that was sent to MDE, correct?

5 THE WITNESS: Yeah.

6 BY MR. UDOIBOK:

7 Q. And then in the site capacity it's 500, correct?

8 A. Yes.

9 Q. Now, did Stigma-Free exceed the 500?

10 A. Yeah. According to their count sheets, yes.

11 Q. Well, at what time period?

12 A. The whole time.

13 Q. So they were allowed, the application, it was 500 for  
14 lunch. And what was for breakfast?

15 A. I think the same.

16 Q. The same 500, totaling what? So if you have breakfast  
17 and lunch, 500 breakfast, 500 lunch, how many does that  
18 amount to?

19 A. 500 for breakfast and 500 for lunch.

20 Q. Okay. For one day how much, how many meals?

21 A. Oh, I guess if you count breakfast and lunch, a thousand  
22 meals.

23 Q. Okay. I thought I wasn't doing my math properly.

24 Now, did Stigma-Free exceed the thousand  
25 allocated?

1 A. Yes.

2 Q. When?

3 A. Every day.

4 Q. So your testimony here is the meal count that was  
5 submitted was never approved by MDE.

6 A. Well, by "approval," what do you mean?

7 Q. Well, was there, was there -- okay. Let me back up.

8 This is site application, right?

9 A. Sure.

10 Q. And the site application, is it ever approved by MDE?

11 MR. THOMPSON: Objection. Beyond the scope. Your  
12 Honor, I think this is the wrong witness for this line of  
13 inquiry.

14 THE COURT: Sustained.

15 BY MR. UDOIBOK:

16 Q. Your testimony is that the meal count was unreasonable,  
17 right?

18 A. Yes, in my opinion.

19 Q. And it is unreasonable because it is beyond what the  
20 sites can produce, correct?

21 A. I believe so.

22 Q. And that they did not deliver that amount of food,  
23 correct?

24 A. That's what I believe.

25 Q. My question is: Was the site, the site allocation, the

1 portions, the meal counts allowed by that site, was it ever  
2 approved by MDE at the initial application?

3 A. I don't know.

4 Q. Okay. So when you say it is excessive, all right, you  
5 were basing it on just your assumption without knowing  
6 whether MDE approved that site allocation.

7 A. I'm basing it on numerous things, the investigation, the  
8 size of the location, the size of the city it's in, the  
9 school districts around it, the fact that every day the  
10 numbers rarely changed. They hovered right around 3,000.  
11 They never took a day off. Those are the reasons.

12 Q. Well, I know that's what you are saying. My question,  
13 though, is, I'm trying to get at, is the meal count you  
14 testified that is consistent, right?

15 A. Yes.

16 Q. And it was consistent, 3,000 consistent, you know,  
17 2,000, correct?

18 A. Yes.

19 Q. As you sit here today, you don't have any information  
20 whether MDE approved prior to delivery of the food -- I know  
21 you contest with that -- whether MDE approve that number of  
22 food being delivered?

23 MR. THOMPSON: Objection. Asked and answered.  
24 Foundation.

25 THE COURT: Overruled.

1                   You may answer.

2                   THE WITNESS:  Sorry.  Can you repeat that?

3  BY MR. UDOIBOK:

4  Q.  I'm going to try.

5                   All right.  Feeding Our Future submitted claims  
6  from sites, Stigma-Free?

7  A.  Correct.

8  Q.  And they submitted 2,000 meal counts.

9  A.  True.

10  Q.  We agree on that?

11  A.  Yes.

12  Q.  And as you sit here today, do you know whether MDE  
13  pre-approved that number of food to be delivered?

14  A.  I don't know that.

15  Q.  Okay.  You testified -- let's look at G40, just for an  
16  example, G40.

17                   MS. MALLET:  I need it back.

18                   MR. THOMPSON:  I'm sorry.

19  BY MR. UDOIBOK:

20  Q.  All right.  So this is Stigma-Free, Willmar folder; is  
21  that right?

22  A.  Yes.

23  Q.  All right.  And you see the check, the checks there,  
24  claims, attendance receipts, and what is the last one there?  
25  Meal?

1 A. My guess would be meal counts.

2 Q. All right.

3 So, Mr. Thompson, could you just go through --  
4 it's only eight pages.

5 MR. THOMPSON: I'm trying. My mouse seems to have  
6 failed on me.

7 MR. UDOIBOK: Maybe I can -- now.

8 MR. THOMPSON: Hold on.

9 MS. MALLETT: Give it back to me.

10 MR. THOMPSON: She has it.

11 MR. UDOIBOK: All right. Thank you.

12 BY MR. UDOIBOK:

13 Q. So you see the summer meal count, correct?

14 A. Yes.

15 Q. Ms. Mallet, go to the first page so we can -- all right.

16 So you testified -- we just go through quickly  
17 page 1, go through page 2 slowly, I mean, not as fast as you  
18 normally are. Next page.

19 All right. So these are the meal count. All  
20 right?

21 A. Yep.

22 Q. Go to the next page.

23 And there's the summer meal count clicker?

24 A. Yep.

25 Q. Correct?

1 Back up.

2 And the number of children requesting meals, call  
3 out that section. No. Number of children requesting meals  
4 of, food is gone. They have 71, 69. There you go.

5 Those are numbers of children that supposedly were  
6 turned away, correct?

7 A. Yeah, that's how I read it.

8 Q. And what I was getting at is this: Isn't it true that  
9 the 3,000 that you see on top, those are the numbers that  
10 the sites, Stigma-Free, was pre-approved to deliver,  
11 correct?

12 A. I don't know that they were pre-approved.

13 Q. Okay. But you don't have any -- you don't have any  
14 information otherwise?

15 A. Not about who pre-approved them for what.

16 Q. Okay. Excuse me?

17 A. I don't know who pre-approved them for what amount.

18 Q. Okay. Next page.

19 Is the same amount, correct?

20 A. Yes.

21 Q. Next page. The next page.

22 So these are meal counts that moneys were paid,  
23 correct?

24 A. Yes.

25 Q. From MDE, correct?

1 A. Correct.

2 Q. All right. And you believe it was an alarming number.

3 A. I do.

4 Q. But in October -- do you have any information that on  
5 November 8, 2020, that it was alarming to MDE?

6 A. No, I don't know if it was alarming to them.

7 Q. Okay. All right. So, Officer -- Inspector, sorry. I  
8 don't mean to diminish you.

9 A. That's okay.

10 Q. You understand the concept of contract, don't you?

11 A. Yeah.

12 Q. Feeding Our Future had an agreement with MDE, correct?

13 A. Correct.

14 Q. And the sites had an agreement with Ms. Bock, correct?

15 A. Correct.

16 Q. And based on your, based on your investigation, do you  
17 know whether or not at any time MDE terminated Feeding Our  
18 Future from participating in its food nutrition program?

19 A. At any time?

20 Q. Yeah.

21 A. Well, I think there was an issue at one point in time.

22 Q. And there was a stop pay?

23 A. Yeah.

24 Q. It was removed, correct?

25 A. I don't know all the machinations of it, but there

1 was --

2 Q. Just if you know.

3 A. Yeah.

4 Q. And the moneys were paid?

5 MR. THOMPSON: Your Honor, this is far beyond the  
6 scope of the agent's knowledge.

7 MR. UDOIBOK: I'll withdraw that question.

8 THE COURT: Sustained.

9 BY MR. UDOIBOK:

10 Q. Now the federal government execute a search warrant,  
11 correct, on Feeding Our Future.

12 A. Yes.

13 Q. Correct? And you reviewed with counsel checks that were  
14 written, correct?

15 A. Yes.

16 Q. By some of the sites.

17 A. Yes.

18 Q. To various entities, correct?

19 A. Correct.

20 Q. And those checks came from Feeding Our Future.

21 A. Yes.

22 Q. And you acquired that pursuant to a search warrant from  
23 a court?

24 A. The checks were, could have been subpoenaed by a bank  
25 record. They are bank records.

1 Q. It was, it wasn't -- you didn't walk up to the bank and  
2 just pick it up, pick the checks up?

3 A. A legal process.

4 Q. Oh, yes. And does, does Feeding Our Future, Ms. Bock,  
5 have subpoena power?

6 A. Maybe her defense attorney does. I'm not sure.

7 Q. To get records from sites, bank records?

8 MR. THOMPSON: Objection, Your Honor. Foundation.  
9 Beyond the scope.

10 THE COURT: Sustained.

11 MR. UDOIBOK: All right.

12 BY MR. UDOIBOK:

13 Q. Let me put it this way. You received the bank records  
14 based on a subpoena, correct?

15 A. Sure.

16 Q. All right. And what was your expectation for Feeding  
17 Our Future when the checklist of the documents are provided  
18 by the sites to Feeding Our Future? What was you supposed  
19 to do?

20 A. I'm not sure I understand the question.

21 Q. So there's an application approved by MDE, correct?

22 A. Correct.

23 Q. Site ID approved by MDE, correct?

24 A. Correct.

25 Q. I know you don't have that information. Just trust me

1 that the number of meals was pre-approved.

2 Correct?

3 MR. THOMPSON: Objection, Your Honor.

4 THE COURT: Sustained.

5 MR. UDOIBOK: All right.

6 BY MR. UDOIBOK:

7 Q. If Feeding Our Future went through its checklist, right,  
8 pursuant to the agreement it has with the sites --

9 You follow me so far?

10 A. I do.

11 Q. How would she terminate on agreement?

12 A. Who is she? Ms. Bock?

13 Q. Yes.

14 A. An agreement with a site? Is that what you are asking?

15 Q. Yes. How does she terminate it?

16 MR. THOMPSON: I'm going to object to this  
17 question. I'm not even sure I understand it.

18 THE COURT: Sustained.

19 BY MR. UDOIBOK:

20 Q. You've seen the site application?

21 A. I have.

22 Q. You have seen the site ID, correct?

23 A. Yes.

24 Q. You have seen the meal counts?

25 A. Yes.

1 Q. You have seen the agreement?

2 A. Yes.

3 Q. That records are to be complete, correct?

4 A. Complete, yes.

5 Q. The sites provided those documents. What facts do you  
6 know, based on your investigation, would Ms. Bock use to  
7 deny the claims?

8 A. I think, in my opinion, the sheer number, the fact that  
9 the dollar amount of claims from 2019 went from 4 million to  
10 nearly 200 million within two years, I think she would,  
11 would have been wise to scrutinize this as the sponsor.

12 Q. Yeah, it's wise to scrutinize. Well, my question,  
13 though, is simpler. In the documentation, the documents are  
14 provided to Feeding Our Future, specifically Ms. Bock, the  
15 requisite documents.

16 You agree with me that she cannot deny a claim  
17 that all the documents have been provided to her, correct?

18 MR. THOMPSON: Objection, Your Honor, as to "all  
19 the documents," the requisite documents were provided to  
20 Ms. Bock.

21 THE COURT: Sustained.

22 MR. UDOIBOK: I don't want to go back to going  
23 through the agreements. We read it. We went through the  
24 agreement with you.

25 THE WITNESS: Sure.

1 BY MR. UDOIBOK:

2 Q. All right. Was there anything in that agreement that  
3 says if you bring a million dollar claim, we will deny it?  
4 Did you see any?

5 A. I didn't read that.

6 Q. All right. Was there anything in the agreement that  
7 says before you purchase 200 gallons of milk, you need to  
8 call Feeding Our Future?

9 A. No.

10 Q. All right. Now, you saw the attestation in CLiCS?

11 A. Yes.

12 Q. Was there anything in that attestation between Feeding  
13 Our Future and MDE that says you can terminate, you can  
14 disregard a claim that meets your conditions?

15 MR. THOMPSON: Your Honor, objection as to this  
16 "meeting the condition." That's not the evidence, and  
17 that's not -- that's his testimony.

18 THE COURT: Sustained.

19 BY MR. UDOIBOK:

20 Q. All right. Did you see anything in the agreement, in  
21 the CLiCS, that you went through with counsel that gave  
22 Ms. Bock, Feeding Our Future, any powers to not submit  
23 claims based on suspicion?

24 A. I didn't see anything that said she could, and I didn't  
25 see anything that said she couldn't.

1 Q. All right. If a site complies with Feeding Our Future's  
2 document demands, we went through them, and Ms. Bock out of  
3 her feelings refuses to submit a claim to MDE, would you  
4 agree with me that would be in violation of the agreement  
5 with the sites?

6 MR. THOMPSON: Objection, Your Honor.

7 THE COURT: Sustained. We're going to take an  
8 afternoon break at this time.

9 We'll come back at 3:25.

10 All rise for the jury.

11 3:11 p.m.

12 **IN OPEN COURT**

13 **(JURY NOT PRESENT)**

14 THE COURT: You may all be seated.

15 Counsel, I'm sustaining the questions because they  
16 are hypotheticals that are confusing to the court and I  
17 think the witness. So, and they -- you asked a number of  
18 them.

19 I'm going to continue to sustain objections to  
20 hypotheticals that are based not on the evidence, but, and  
21 are confusing to the court and the witness. Okay?

22 Did the government want to place anything on the  
23 record?

24 MR. THOMPSON: I would, Your Honor.

25 THE COURT: Go ahead.

1 MR. THOMPSON: Your Honor, last week Mr. Colich  
2 raised an issue with respect to some of the codefendants who  
3 are charged in this case but are not at trial here in this  
4 trial, this proceeding, coming to court and watching the  
5 proceedings.

6 And we commented and we agree that we won't be  
7 calling their presence out to the notice of the jury, but  
8 otherwise they obviously have a right to be here as any  
9 member of the public does. Whether or not it's wise, not my  
10 call.

11 Today, though, during the testimony the two Abshir  
12 brothers, Abdinasir Abshir and Asad Abshir, came to court  
13 after the lunch break. They entered the court rather  
14 noisily, and they sat down as close to the jury as they  
15 possibly could.

16 Several times, I couldn't see what they were  
17 doing, but they made noise, and I could hear them behind me,  
18 and then they walked up and got out somewhat noisily.

19 I'm just concerned for the sake of the whole  
20 trial, frankly, that these co-defendants are coming to  
21 court. Frankly, you rarely see people sit as close to the  
22 jury as they did, especially in a courtroom that is largely  
23 empty, more than half empty.

24 I don't know what could be done about it, but I  
25 wanted to let the court know of my concerns, and maybe it

1 was already communicated to them, either through their  
2 lawyers or through the court security officers, to make sure  
3 they are not coming to court in a way that catches the  
4 attention of the jurors, because certainly their behavior  
5 today was not what I would like to see of any member of the  
6 audience, let alone defendants who are charged in this  
7 indictment.

8 THE COURT: Can you state the names one more time  
9 for me today?

10 MR. THOMPSON: Yes, Your Honor. It's Abdinasir  
11 Abshir. A-B-D-I-N-A-S-I-R. Abshir, A-B-S-H-I-R. And Asad  
12 Abshir. A-S-A-D.

13 And they were the two defendants who Inspector  
14 Western testified to, and they ran the Stigma-Free, Mankato  
15 site and Horseed Management LLC.

16 THE COURT: Thank you.

17 Does anyone else want to place anything on the  
18 record with respect to that issue?

19 MR. UDOIBOK: I didn't see it. I was -- my back  
20 is --

21 THE COURT: That's fine. I just want to make sure  
22 no one has a position.

23 MR. COLICH: No, Your Honor.

24 THE COURT: All right. Thank you.

25 All right. Let's take ten minutes, and we'll

1 return.

2 (Recess taken at 3:14 p.m. till 3:24 p.m.)

3 3:24 p.m.

4 **IN OPEN COURT**

5 **(JURY NOT PRESENT)**

6 THE COURT: You may all be seated.

7 All right. Counsel, my understanding is that  
8 someone wants to be heard before the jury comes in?

9 MR. THOMPSON: Yes, Your Honor.

10 Your Honor, before the break I noted the presence  
11 of one of the co-defendants, one or two of the codefendants  
12 here in the courtroom and the ruckus they caused in front of  
13 the jury.

14 During the break I was informed by attorney Ryan  
15 Pacyga, who represents the government's next witness who is  
16 a cooperating defendant in this case, and Mr. Pacyga on  
17 behalf of his client informed us that one of the two  
18 gentlemen in the courtroom approached him outside court and  
19 asked him to come into the bathroom with him.

20 THE COURT: Approached Mr. Pacyga or --

21 MR. THOMPSON: Mr. Pacyga's client, the witness,  
22 the cooperating defendant, who is set to testify next for  
23 the government. He's here with Mr. Pacyga, waiting to  
24 testify here in court.

25 And he asked him to go into the bathroom with him

1 after he learned that this witness, Mr. Jama, was here to  
2 testify on behalf of the government.

3 THE COURT: And did Mr. Jama follow that?

4 MR. THOMPSON: He did not. He did not go into the  
5 bathroom with him and instead informed his lawyer, Ryan  
6 Pacyga.

7 THE COURT: All right. Which of the two men?

8 (Mr. Ebert confers with Mr. Thompson)

9 MR. THOMPSON: Your Honor, if I understand  
10 correctly, there was two individuals in the room. One I  
11 believe to be Abdinasir Abshir, who is a defendant charged  
12 in the case.

13 The other individual, I don't know his identity.  
14 Our next witness, Mr. Jama, believes him to be a relative of  
15 Salim Said, and that's the man who approached him about  
16 going into the bathroom after he learned he was here to  
17 testify for the government.

18 THE COURT: All right. I'm requesting that the  
19 government find out more information from Mr. Jama, if  
20 possible, and then bring that to the court, and the court  
21 will address it in the courtroom with the unnamed  
22 individual.

23 MR. THOMPSON: Thank you, Your Honor.

24 THE COURT: As to the seating in the courtroom,  
25 the court has called the attorneys for both individuals

1 named by the government who were perhaps in the courtroom  
2 earlier, one of them we know, have called the attorneys and  
3 have -- I've instituted a rule by which any defendant in the  
4 larger investigation or this indictment is certainly welcome  
5 in the courtroom, unless they are on the witness list,  
6 unless and until I get a request otherwise.

7 But I'm going to have them seat, be seated on  
8 either side as close to the aisle as possible. So I'm  
9 instituting that rule.

10 We've let the counsel know for the individuals we  
11 know who were in the courtroom. And other than that, I'll,  
12 I'll have court security deal with any security issues.

13 MR. THOMPSON: Your Honor, may I ask and request  
14 that the court instruct the two defendants on trial here be  
15 admonished not to communicate with any codefendants in the  
16 case about the courtroom proceedings or anything else during  
17 the pendency of this trial?

18 THE COURT: Is there any objection to that?

19 MR. UDOIBOK: Would you repeat that? I just  
20 wasn't quite clear.

21 MR. THOMPSON: I would ask that the court admonish  
22 both defendants, Bock and Said, to have no communications  
23 with codefendants in this case during the pendency of the  
24 trial and certainly not about the courtroom proceedings,  
25 witness testimony or exhibits.

1 THE COURT: Any objection?

2 MR. UDOIBOK: No objection.

3 MR. COLICH: Your Honor, basically I have no  
4 objection, but what I have learned in working with Somali  
5 citizens that there's a lot of interaction between  
6 individuals who are family members and that if there's a  
7 crisis or if there's an issue that they will go to the aid  
8 of those people.

9 So I certainly don't oppose interaction between  
10 defendants and codefendants regarding discussions of the  
11 case. I do know personally that there are some very  
12 traditional practices in their culture that brings them  
13 together quite often.

14 Now, I also don't know that there's any  
15 relationship between my client and someone else in this case  
16 that would be identified as a relative.

17 MR. THOMPSON: Your Honor, the last time there was  
18 a crisis related to this case involving a jury trial before  
19 Your Honor, relatives of defendants attempted to bribe a  
20 juror. So obviously I don't really care about those  
21 cultural norms.

22 Today, we have to protect the integrity of this  
23 courtroom proceeding, and that's true to the fairness for  
24 these defendants, too, and not have the appearance of  
25 impropriety as codefendants come walzing in here, making a

1 scene and sitting as close as possible to the jurors.

2 Obviously, I don't know whether the jurors have  
3 heard about the jury bribery. I assume not and they won't  
4 consider it.

5 But honestly, we need to protect the integrity of  
6 the proceedings, and I've had it about to here (indicating)  
7 with the shenanigans in this case and this community, and I  
8 don't think cultural differences are an adequate explanation  
9 for attempts to monkey with and interfere with our criminal  
10 justice system.

11 THE COURT: Ms. Bock and Mr. Said, you are not to  
12 speak with anyone who is either a witness or a codefendant  
13 in the case at all about anything during the pendency of  
14 this trial. This trial isn't going to last that long, and  
15 so I'm instituting that rule.

16 It concerns me greatly that we have a cooperating  
17 defendant who is a witness who is out in the hallway who was  
18 potentially approached to meet without his attorney just  
19 outside the courtroom. It's very concerning to the court.

20 And so that's why I've asked the government to  
21 follow up on it.

22 I'm instituting that rule. And we're ready to  
23 continue.

24 Can you get the jury?

25 Thank you.

1 All rise for the jury.

2 3:32 p.m.

3 **IN OPEN COURT**

4 **(JURY PRESENT)**

5 THE COURT: You may all be seated.

6 Mr. Udoibok, you may continue.

7 MR. UDOIBOK: Thank you, Your Honor.

8 BY MR. UDOIBOK:

9 Q. Inspector, let's, let's shift gear a little bit to  
10 Exhibit G51 that you testified to earlier.

11 And who is driving? Ms. Mallet, are you driving?

12 MS. MALLETT: Trying.

13 BY MR. UDOIBOK:

14 Q. There you go. Go to page 3 of Exhibit 51.

15 You testified to this exhibit, that that was an  
16 invoice, right, from Afro Produce LLC?

17 A. Yes.

18 Q. And is that Brava Restaurant purchasing food? At least  
19 that's what the invoice purports?

20 A. That's what the invoice purports, yes.

21 Q. All right. Now, and this invoice was ultimately sent to  
22 Feeding Our Future, correct?

23 A. Correct.

24 Q. And Feeding Our Future paid, correct?

25 A. Correct.

1 Q. Is it your position that Feeding Our Future should not  
2 have paid this invoice?

3 MR. THOMPSON: Objection. Relevance.

4 THE COURT: Overruled.

5 You may answer.

6 THE WITNESS: This invoice?

7 BY MR. UDOIBOK:

8 Q. Scroll down to the end.

9 A. It's invoiced to -- it's supporting documentation --

10 Q. Yes.

11 A. -- for Brava Restaurant.

12 Q. For the supplies that Brava purchased, correct?

13 A. Purportedly, yes.

14 Q. And my question was, Is it your position that Ms. Bock  
15 should not have paid, Feeding Our Future should not have  
16 paid the bill from Brava Restaurant based on the supporting  
17 documents?

18 MR. THOMPSON: Your Honor, the Feeding Our Future  
19 wasn't a party to this invoice.

20 THE COURT: Mr. Udoibok.

21 BY MR. UDOIBOK:

22 Q. Was this invoice submitted as supporting documents for  
23 Brava to purchase food?

24 A. Yes.

25 Q. All right. And it supported the bill that Brava sent to

1 Feeding Our Future, correct?

2 A. I think Brava submitted a meal count that they got paid  
3 for.

4 Q. Yes.

5 A. I don't think they got reimbursed for this purported  
6 grocery bill.

7 Q. Go to page 16.

8 That is the attendance, correct?

9 A. Yeah, it appears to be their attendance list.

10 Q. And you testified earlier that -- you testified earlier  
11 that you are not sure whether attendance was required or  
12 not, correct?

13 MR. THOMPSON: Objection. Misstates his  
14 testimony.

15 THE COURT: Overruled.

16 You may answer, if you can.

17 THE WITNESS: At this particular time, I don't  
18 know.

19 BY MR. UDOIBOK:

20 Q. All right. Go to page 7.

21 Is that a meal count?

22 A. Yes.

23 Q. All right. I'm just asking you based on your knowledge  
24 of this case, was the Afro foods invoice one of the  
25 supporting documents of the amount of food purchased for

1 feeding the number of people expressed on page 7 of  
2 Exhibit G51?

3 A. I think that invoice, submitting that invoice was their  
4 attempt to show that they had purchased some food.

5 Q. All right. Now, was, was your, was it your expectation  
6 based on your investigation that Ms. Bock or Feeding Our  
7 Future should not have submitted the claim to MDE?

8 MR. THOMPSON: Objection, Your Honor. Inspector  
9 Western wasn't there. He had no expectation.

10 THE COURT: Sustained.

11 BY MR. UDOIBOK:

12 Q. All right. Do you know whether or not Feeding Our  
13 Future submitted this claim to MDE?

14 A. My assumption would be that they did.

15 Q. All right. And is it your belief that Ms. -- Feeding  
16 Our Future should not have submitted it?

17 MR. THOMPSON: Objection, Your Honor.

18 THE COURT: Sustained.

19 BY MR. UDOIBOK:

20 Q. All right. Let's go to page, let's go to page 6.

21 You testified to this meal count, didn't you?

22 A. Yes.

23 Q. Now, what is, what is on Sunday, Monday Tuesday,  
24 Wednesday, Thursday? What is that? Is that a meal count?

25 A. No. I think that would, that would indicate, that would

1 indicate that October 1st was a Friday; and Sunday, Monday,  
2 Tuesday, Wednesday, Thursday would have been probably the  
3 end of November would be my guess.

4 Q. So it was crossed out?

5 A. Yeah.

6 Q. All right. And let's go to G52.

7 This is Stigma-Free, Willmar you testified to  
8 earlier?

9 A. I did.

10 Q. All right. Ms. Mallet, go to page 6 of that document.

11 There's a big X crossed out. What is that?

12 A. I think similar to the other one, this, this one starts  
13 on the 28th of November. So I think the three Sunday,  
14 Monday, Tuesday days would represent the 28, 29th and 30th  
15 of November.

16 Q. All right.

17 A. And the rest of that week would be put on a -- December  
18 would be put on a different meal count sheet.

19 Q. And that's a meal count, correct?

20 A. Correct.

21 Q. All right. Now, based on the investigation, did you  
22 uncover anything that this specific meal count was  
23 incorrect?

24 A. Throughout the whole investigation?

25 Q. Yeah. I mean, was it correct or wrong?

1 A. Based on the totality of information we have, interviews  
2 of people, yeah, I think this is, like I mentioned earlier,  
3 incorrect and inflated numbers.

4 Q. And you have information that Ms. -- Feeding Our Future,  
5 let me see, Ms. Bock knew this particular exhibit was  
6 incorrect?

7 A. This one sheet here?

8 Q. Correct.

9 A. I don't know if she looked at this one sheet.

10 Q. Where did this, this meal count go to, the email on the  
11 meal count?

12 Ms. Mallet, would you call out the email address?  
13 The first sponsor email address, please. Go back. There  
14 you go.

15 Whose email address is that?

16 A. Claims@feedingourfuturemn.org. That's Feeding Our  
17 Future's claims email address.

18 Q. Do you know how many people work at claims department at  
19 Feeding Our Future?

20 A. I don't.

21 Q. Is that Ms. Bock's email address?

22 A. Her personal one, no.

23 Q. Okay. Now, let's go to G8, Government Exhibit G8.

24 Would you call out the email from/to section?

25 This email is from whom?

1 A. This is from Stigma-Free at gmail.com to  
2 claims@feedingourfuturemn.org, copying  
3 eidleh@feedingourfuturemn.org.

4 Q. Is Ms. Bock's email in that Exhibit 8?

5 A. No.

6 Q. All right. Let's go to G12, please. Highlight the  
7 email, please.

8 Who is that email from?

9 A. Again, that one is from stigma-freemn1@gmail to the  
10 claims email box and Eidleh's email box at Feeding Our  
11 Future.

12 Q. What is the attachment?

13 A. The attachment is Willmar breakfast and Willmar lunch,  
14 assuming meal counts attached.

15 Q. Is that email sent to Ms. Bock?

16 A. Not specifically to aimee@feedingourfuturemn.org.

17 Q. In fact, is it sent to Eidleh and claims department,  
18 correct?

19 A. Correct.

20 Q. And you testified earlier that you don't know how many  
21 people work in claims, correct?

22 A. Correct.

23 Q. And did your investigation lead you to determine what  
24 was Eidleh's relationship with Feeding Our Future?

25 A. Yeah, he was an employee.

1 Q. He was an employee. Was he a management employee or  
2 just a clerk?

3 A. I'm not sure what his exact title was.

4 Q. All right. I want to direct you to Exhibit 46 that you  
5 testified to earlier. And what month is that claim?

6 A. That's June of 2021.

7 Q. All right. Go to the next page, please. Let me see.  
8 Continue. Next page.

9 What time period is this claim, meal count?

10 A. This is the end of June 2021.

11 Q. All right. Do you know one way or the other whether  
12 Stigma-Free, Willmar was open in May 2021?

13 A. In May?

14 Q. Yes.

15 A. I assume they were.

16 Q. You assume that.

17 A. Yeah.

18 Q. All right. But you don't have any specific knowledge  
19 whether or not they were open.

20 A. If we have documents for it, I guess.

21 Q. If you don't, you don't.

22 A. Yeah.

23 Q. Okay. Ms. Mallet, why don't you pull up G47, first  
24 page.

25 This is July?

1 A. Correct.

2 Q. And it's Willmar also?

3 A. Yes.

4 Q. And based on your investigation and even testimony  
5 today, does the check marks represent the things in this  
6 folder, G47?

7 A. Yeah, I think that they would probably represent --

8 Q. The claim?

9 A. -- that they have everything in the folder that is  
10 marked on here.

11 Q. All right. Do you know whether Feeding Our Future was  
12 required to maintain these records? I believe we, we read  
13 some instructions.

14 Do you know whether they were required to maintain  
15 these documents as part of the participation in the food  
16 program?

17 A. I don't know specifically.

18 MR. THOMPSON: Objection. Beyond the scope, Your  
19 Honor.

20 THE COURT: Overruled. The answer will stand.

21 BY MR. UDOIBOK:

22 Q. Why don't you look at G42 that you testified to earlier.  
23 And this is also, this is Stigma-Free January 21st, correct?

24 A. Correct.

25 Q. And within this folder are what?

1 MR. THOMPSON: Your Honor, I'm going to object to  
2 him showing the first page of the folder and asking for the  
3 contents.

4 THE COURT: Sustained.

5 BY MR. UDOIBOK:

6 Q. All right. Well, does this folder state there's claims,  
7 there's claim, attendance and receipt?

8 MR. THOMPSON: Your Honor, that's not what's in  
9 the folders.

10 MR. UDOIBOK: It is.

11 THE COURT: Sustained.

12 BY MR. UDOIBOK:

13 Q. All right. Go to the first page. What is that?

14 A. It's a meal count.

15 Q. Next page. What is that?

16 A. Another meal count.

17 Q. What is that?

18 A. Another meal count.

19 Q. Continue to go on to --

20 A. Meal count, meal count, meal count, meal count, meal  
21 count, meal count.

22 Q. Stop there.

23 Now, Ms. Mallet, circle the week on to the right.

24 What week is that?

25 A. Looks like the week of January 31st, 2021.

1 Q. Okay. Get out.

2 And then the days?

3 A. Just Sunday.

4 Q. All right. Next page.

5 MS. MALLET: That's the last page.

6 BY MR. UDOIBOK:

7 Q. All right. So there were meal counts in that exhibit?

8 A. Say that one more time?

9 Q. There were meal counts.

10 A. Yes.

11 Q. Okay. And in the signature page, someone signs that  
12 meal count, correct?

13 A. Correct.

14 Q. And who is that, do you know?

15 A. It may be Mr. Mohamud.

16 Q. But it's not Ms. Bock, is it?

17 A. No, it's not Ms. Bock.

18 Q. Okay. I think we talked about G6.

19 Why don't you, Ms. Mallet, would you call out G6  
20 for me.

21 And this is an email from Mr. Mohamud to Eidleh,  
22 correct?

23 A. Yes.

24 Q. And also claims, correct?

25 A. Correct.

1 Q. And what are those attachments, if you know?

2 A. If my recollection is correct, I think they are meal  
3 counts.

4 Q. All right. Let's just go through first second page.  
5 Those are meal counts?

6 A. Yes.

7 Q. Let's just take --

8 Ms. Mallet, just call out as much as you can.

9 And the signature there is who?

10 A. Looks like Abdikadir Mohamud.

11 Q. All right. And it's not Ms. Bock, is it?

12 A. No, it's not.

13 Q. All right. And go to the first page, Ms. Mallet. First  
14 page.

15 And the email is sent to who?

16 A. Claims at Feeding Our Future and Mr. Eidleh at Feeding  
17 Our Future.

18 Q. And it's not Ms. Bock, correct?

19 A. No, her email is not on there.

20 Q. And you don't know how many people worked in the claims  
21 department of Feeding Our Future?

22 A. I don't.

23 Q. I'm almost done.

24 Why don't you look at, pulling up F21. That's,  
25 you testified to F21. This is an email from Jamal Osman to

1 Abdi Salah, correct?

2 A. Correct.

3 Q. And in summary, would you agree with me that that  
4 included the documentation for the initial incorporation of  
5 the new corporation, correct?

6 A. For the, yes, the nonprofit for --

7 Q. Yes.

8 A. -- Stigma-Free, yes.

9 Q. Now, Ms. Bock did not participate in the creation of  
10 that nonprofit, was she?

11 A. I don't see her name on anything.

12 Q. Okay. I think you testified regarding, is it S7, like  
13 in Sam? I may have mis heard counsel.

14 S7. Could you pull that up?

15 MR. THOMPSON: F7.

16 MR. UDOIBOK: Is it F7?

17 MR. THOMPSON: Frank.

18 MR. UDOIBOK: Yeah, F like in frank.

19 BY MR. UDOIBOK:

20 Q. You testified about the clarification that Ms. Bock  
21 wrote to MDE regarding for-profit versus nonprofit  
22 participation in the food program, correct?

23 A. Correct.

24 Q. And Ms. Bock clarified that Feeding Our Future would be  
25 staffing this site, correct?

1 A. Correct.

2 Q. And do you know whether Feeding Our Future staffed the  
3 site?

4 A. Which site?

5 Q. The Safari site.

6 A. I don't, I don't know if anybody claimed to work for  
7 Feeding Our Future there.

8 Q. I just want to understand you. You don't know one way  
9 or the other whether Feeding Our Future staffed it?

10 A. For that site?

11 Q. Yes.

12 A. No.

13 Q. Okay. She sent, Ms. Bock sent a clarification so that  
14 she would comply with, you know, only nonprofit  
15 participating in the program, correct?

16 A. I don't believe that was the intention.

17 Q. The clarification was, Feeding Our Future is a nonprofit  
18 and will staff the site, correct?

19 A. Yes. That's what they told MDE that they would be  
20 staffing sites, and that was their way to comply with the  
21 nonprofit ruling.

22 Q. That that, what Feeding Our Future was doing was  
23 allowable, correct?

24 A. Was what?

25 Q. Allowable?

1 A. Yes, if they staffed the sites.

2 Q. Okay.

3 MR. UDOIBOK: No further questions.

4 THE COURT: Mr. Colich.

5 MR. COLICH: Ken, you want this? You want this?

6 May I Your Honor?

7 THE COURT: You may.

8 CROSS-EXAMINATION

9 BY MR. COLICH:

10 Q. Good afternoon.

11 A. Good afternoon.

12 Q. You are earning your paycheck today, aren't you?

13 A. Yes.

14 Q. Yeah. So I'm going to try to get through my questioning  
15 with you without calling up one exhibit. I'm only going to  
16 be discussing with you maybe for the purposes of this jury  
17 sort of the organizational stuff you testified about in part  
18 today.

19 A. Sure.

20 Q. Okay? So we keep hearing this phrase "Safari group,"  
21 which is apparently now synonymous with my client. You've  
22 heard the prosecutor say Safari group numerous times, have  
23 you not?

24 A. Correct.

25 Q. So you know, do you know the name of, let's see,

1 Abdulkadir Nur Salah?

2 A. Yes.

3 Q. Okay. Do you know the name of Abdirahman Mohamud Ahmed?

4 A. Yes.

5 Q. And is it correct that those are the two men that  
6 originally formed Cosmopolitan Business Solutions?

7 A. I'm not sure if it was just those two. Yeah. I'm not  
8 sure the formation of that company.

9 Q. If there had been testimony in the courtroom that these  
10 are two men that initially formed it and opened a bank  
11 account, would you have any reason to disagree with that?

12 A. No.

13 Q. And as far as your investigation, did you learn at some  
14 time later in time my client became part of Cosmopolitan  
15 Business Solutions?

16 A. Yes.

17 Q. Okay. And do you know, have you heard of the Total  
18 Financial Solutions company?

19 A. I have.

20 Q. And do you know who are the owners of that?

21 A. No, not specifically.

22 Q. Well, if I told you one was Abdulkadir Nur Salah, would  
23 you have any reason to disagree with?

24 A. No, I wouldn't.

25 Q. And if I told you another one was Ahmed Sharif

1 Omar-Hashim, would you have any reason to disagree with me?

2 A. No.

3 Q. And if I told you they were brothers, would you have any  
4 reason to disagree with me?

5 A. Say the first one's name again?

6 Q. The first one?

7 A. Yeah.

8 Q. It's the same as the person that I named earlier with  
9 Cosmopolitan, Abdulkadir Nur Salah.

10 A. All right. I know that Abdi Salah and Abdulkadir Salah  
11 are brothers.

12 Q. My next question: But you are not, you don't know  
13 personally whether Mr. -- I'll shorten it -- Omar-Hashim is  
14 a brother of theirs?

15 A. I'm not aware of that.

16 Q. Do you know that name, however?

17 A. Yes.

18 Q. Is that tied to Olive Management?

19 A. Yes.

20 Q. So you know that at least they are tied together one way  
21 or the other. You can't tell this jury for a fact they're  
22 brothers, right?

23 A. I know two of them are brothers.

24 Q. But do you know if the third is?

25 A. I'm not sure. Someone might on our team.

1 Q. Okay. But you know they have all pled guilty, correct?

2 A. Correct.

3 Q. Okay. So bear with me one minute. I want to make sure  
4 I get this correct. Let's go to Stigma-Free for a moment.

5 A. Okay.

6 Q. It was interesting to me. So Jamal Osman and his wife  
7 are initially the owners of Stigma-Free International; is  
8 that correct?

9 A. Yes, that's correct. They are on the board.

10 Q. Okay. And there's a bank account at U.S. Bank in the  
11 name of Stigma-Free International.

12 A. Correct.

13 Q. Okay. Am I correct that you said that was a shell  
14 company?

15 A. Yes.

16 Q. And you concluded that because there was no activity in  
17 that account?

18 A. Correct.

19 Q. Okay. Now I'm not here to support those people at all,  
20 but is it possible for someone who might be inclined to  
21 start a business to open an account to not have anything to  
22 put in that account initially?

23 A. Over the course of a year, I guess it's possible.

24 Q. Okay. Would you still say that's a shell company then?

25 A. Well, I mean, I guess based on the facts that I saw in

1 the bank records and --

2 Q. Well, let me just -- can you answer the question?

3 A. Sure.

4 Q. Because this is important for me and my daughter who  
5 opened her business and has a bank account now. She has not  
6 made a penny in a year and a half.

7 A. Repeat that.

8 Q. Sure. Is it a shell company if someone opens the  
9 account in the name of a company with the expectation maybe,  
10 at least in my life the expectation was, you are going to  
11 make a lot of money, but they don't. So they are not  
12 putting any money in the account?

13 Is that a shell company?

14 Thank you for waiting.

15 MR. THOMPSON: Objection, Your Honor.

16 THE COURT: Sustained.

17 BY MR. COLICH:

18 Q. Okay. Well, let's go back to Mr. Osman. I believe your  
19 testimony was that at sometime during this process of them,  
20 did they sell this to these other individuals?

21 A. I'm not aware of any financial arrangement.

22 Q. They just freely voluntarily transfers it to them.

23 A. It appears to be.

24 Q. Okay. And that's during the time that Mr. Osman is  
25 running for city council?

1 A. Yeah.

2 Q. And it happens to be that Abdi Salah is a top aide to  
3 the mayor, correct?

4 A. I don't know about the top aide, but a senior aide.  
5 Yes.

6 Q. He's an aide, a senior aide. Okay.

7 Was that fishy to you? Was that suspicious?

8 A. Not necessarily.

9 Q. Okay. And then, now here's where we get to the use of  
10 the word "Safari group." It was presented to you that the  
11 Safari group then take over Stigma-Free International.

12 Do you recall that question?

13 A. Yes.

14 Q. And your answer was yes?

15 A. Yes.

16 Q. Okay. So who from the Safari group did we talk about  
17 when you were discussing Stigma-Free and all their sites?  
18 What principals do we talk about for that, do you recall?

19 A. I do. I believe there was an email --

20 Q. Well, you are talking about one email. I'm talking  
21 about an hour and a half discussion where you were talking  
22 about Stigma-Free and all these different sites that were  
23 opened up by Stigma-Free. Okay?

24 Is it correct that you talked of course about Abdi  
25 Nur Salah?

1 A. Yeah.

2 Q. And you talked about the board of directors; is that  
3 correct?

4 A. Correct.

5 Q. And one was Ahmed Artan, correct? He was the chairman?

6 A. Correct.

7 Q. And you know those forms you've we've been looking at  
8 with the counts on the meals?

9 A. Yes.

10 Q. And I at one point during this process, I don't remember  
11 when it was now, said look at that bottom line. Who is  
12 identified as the person who says it's true and accurate?  
13 And there are initials, right?

14 Do you remember that?

15 A. Yeah, a lot of initials on those.

16 Q. Lots.

17 A. Yes.

18 Q. Okay. And so are you interpreting that to mean whoever  
19 is the person who is initialing that and signing is the  
20 person who actually has looked at that counts and apparently  
21 been there to verify those accounts?

22 A. That's what they are purporting to represent.

23 Q. Okay. So what we need to be looking at is whether or  
24 not there are any sites that ever produced my food, correct?

25 A. Correct.

1 Q. And it's easy to say there are sites that didn't,  
2 correct?

3 A. Sure.

4 Q. Particularly if you go and say two and a half years  
5 after COVID hit and a some of these, some of these sites  
6 opened up, correct?

7 A. Sure.

8 Q. So if you are looking at a site two years after COVID,  
9 it might be a heck of a lot different than it was right  
10 during COVID, right at the beginning?

11 Would that be fair to say?

12 A. That's fair to say.

13 Q. Okay. All right. So do you know who are the partners  
14 in ASA Limited LLC?

15 A. I know one of them is Mr. Said.

16 Q. Correct. Do you know the name Ahmed Ghedi?

17 A. Yes.

18 Q. Do you know the name of Abdihakim Ahmed?

19 A. Yes.

20 Q. Okay. Does that ring a bell for you as far as who was  
21 involved in that?

22 A. Yes.

23 Q. And did you go to that site?

24 A. I did not.

25 Q. Okay. Do you know who was managing that site?

1 A. I don't.

2 Q. Do you know who might have signed the --

3 Do you want me to finish or --

4 MR. THOMPSON: I do.

5 MR. COLICH: Okay.

6 BY MR. COLICH:

7 Q. Do you know who might have been signing the meal counts  
8 from there?

9 MR. THOMPSON: Objection, Your Honor. This is  
10 beyond the scope of his testimony. He testified to the  
11 Stigma-Free, Willmar and Stigma-Free, Mankato sites.

12 THE COURT: Sustained.

13 MR. COLICH: Okay. So let's go to those sites.

14 BY MR. COLICH:

15 Q. Let's start with Willmar. Just so I have the structure  
16 here, is Ahmed Artan involved in that?

17 A. Yes.

18 Q. Okay. And he is the chairman of the board or something,  
19 right?

20 A. Of the new Stigma-Free, yes.

21 Q. New Stigma-Free. And what is his role there?

22 A. He's the chairman of the board.

23 Q. Okay. And so Abdikadir Mohamud, that would be AK. He  
24 was the alleged vendor; is that correct?

25 A. Yes. He ran the site and had a company called Tunyar

1 Trading.

2 Q. Okay. All right. And I know that my client's name has  
3 come up in your testimony regarding a couple invoices or  
4 things. You recall that?

5 A. I do.

6 Q. But other than that testimony, which was laid out  
7 very -- in an ordinary fashion like everything else, my  
8 client's name never came up during your testimony regarding  
9 the Willmar site, did it?

10 A. Other than those two emails, I don't believe it did.

11 Q. Okay. Let's go to Mankato. That is a Mr. Abshir, and  
12 that's Horseed Management?

13 A. Correct.

14 Q. Okay. During that testimony, did you talk about my  
15 client?

16 A. I don't recall if he sent one of the emails.

17 Q. Okay.

18 A. We spoke about one of those.

19 Q. Okay. So what we've done is, we tried to create a  
20 little more structure here so the jury can put this in  
21 perspective for who is from what companies and who is doing  
22 what at other times.

23 A. Yes.

24 Q. Would it be fair to say you and I have done that?

25 A. Yes.

1 MR. COLICH: Okay. Thanks.

2 THE COURT: Mr. Thompson, redirect.

3 MR. THOMPSON: Yes, Your Honor.

4 REDIRECT EXAMINATION

5 BY MR. THOMPSON:

6 Q. Good afternoon again, Inspector Western.

7 A. Hello.

8 Q. You were asked on cross-examination by Mr. Udoibok a  
9 series of questions about who certified these claims; is  
10 that right?

11 A. Yes.

12 Q. What was your understanding of Ms. Bock and her  
13 organization's role in the Federal Child Nutrition Program?

14 A. She was the sponsor.

15 Q. And what does the sponsor do?

16 A. In laymen's term, they're kind of the gatekeeper.

17 Q. And what do you mean by the "gatekeeper"?

18 A. They are the sponsor of numerous companies that want to  
19 get involved for sites, and they facilitate the paperwork,  
20 the payments, et cetera.

21 Q. Okay. And when you say the "paperwork," what kind of  
22 paperwork does Ms. Bock and her company Feeding Our Future  
23 do for a site that it sponsors?

24 A. The application, as we've seen today in the exhibits,  
25 they maintain the meal counts and any other documentation.

1 Q. And what other documentation do they gather?

2 A. You say what other?

3 Q. Yes.

4 A. Well, they also had rosters.

5 Q. Attendance rosters?

6 A. Attendance rosters, yeah.

7 Q. And what's the purpose of those attendance rosters?

8 A. To support, purportedly to support the, the kids that  
9 are in the meal counts.

10 Q. Okay. And there was some testimony today about, or you  
11 were asked about when those rosters were required; is that  
12 right?

13 A. That's correct.

14 Q. Could you explain generally the requirement of the  
15 rosters?

16 A. Can I or did I?

17 Q. Yes, can you.

18 A. At one point the rosters were required.

19 Q. And that's when MDE was cracking down on the system --

20 A. Correct.

21 Q. -- in the spring of 2021?

22 A. Yes.

23 Q. And so after MDE did that, this was during the stop pay,  
24 correct?

25 A. Yes.

1 Q. And when MDE implemented the stop pay on Feeding Our  
2 Future and sites understand its sponsorship, what was it  
3 requiring along with the claims?

4 A. Rosters.

5 Q. Okay. Verification up front?

6 A. Verification, yes.

7 Q. And they had to produce that, correct?

8 A. Correct.

9 Q. Okay. I want to show you. You got asked a series of  
10 questions about contract law, for lack of a better term; is  
11 that right?

12 A. Yes.

13 Q. And I'm showing you here Government Exhibit G3, and this  
14 is that site application for the Stigma-Free, Willmar site;  
15 is that right?

16 A. Yes.

17 Q. And on page 6, there's an agreement between Feeding Our  
18 Future and Stigma-Free, Willmar; is that right?

19 A. Yes.

20 Q. And in the middle of page 7 there's a section that is  
21 titled Sponsoring Organization's Rights and  
22 Responsibilities; is that right?

23 A. Correct.

24 Q. And it says, "In accordance with CACFP regulations and  
25 program directives, Feeding Our Future agrees to," and then

1 there's a series of things that Feeding Our Future agrees to  
2 do under this contract; is that right?

3 A. Yes.

4 Q. And I'm going to skip some of them, if you don't mind.

5 A. Sure.

6 Q. I'm sure you don't.

7 A. No, I don't.

8 Q. And I'm going to direct your attention to page 8. And  
9 there's a series of things under the title or the header  
10 Claims, Reimbursements, Payments, Administrative Fee; is  
11 that right?

12 A. Correct.

13 Q. And can you read Number 11 under Feeding Our Future's  
14 responsibility under this agreement between Feeding Our  
15 Future --

16 A. Yes.

17 Q. -- and Stigma-Free, Willmar?

18 A. Yes. "Submit program's monthly claims for reimbursement  
19 to MDE in a timely manner after confirming documentation to  
20 support the claim and conducting required edits. Establish  
21 a household contact system to verify attendance and income  
22 information of enrolled children, if needed."

23 Q. Okay. And then bullet 13, under the header Claims,  
24 Reimbursement, Payments and Administrative Fee, what does it  
25 say Feeding Our Future?

1 A. "Feeding Our Future may withhold any program payments  
2 for claims that Feeding Our Future has reason to believe are  
3 invalid due to false or erroneous meal counts or are not  
4 supported by program records."

5 Q. So you were asked by Mr. Udoibok whether or not Feeding  
6 Our Future had the ability to reject the claims for the meal  
7 counts submitted by sites under its sponsorship?

8 A. Yes.

9 Q. Did the program agreement allow them to under its plain  
10 language?

11 A. Yeah, absolutely.

12 Q. You were asked a series of questions by Mr. Udoibok,  
13 Ms. Bock's counsel, about based on your investigation and  
14 all your knowledge what was Aimee Bock to do with these  
15 claims. You looked at the claims, right?

16 A. I did.

17 Q. When you first looked at the claims in this case, what  
18 was your reaction?

19 A. It was jaw dropping. Just the sheer number of meals,  
20 the money moving. Yeah, it was unbelievable.

21 Q. Okay. And you'd looked at the meal counts right away,  
22 and they caught your attention?

23 A. Yes.

24 Q. And let's use Stigma-Free, Willmar as an example. What  
25 was it about the Stigma-Free, Willmar meal counts that

1 caught your attention when you first looked at them?

2 A. It was, A, the number of kids in a town of that size and  
3 that size school district. It was the consistency with  
4 which, as you saw earlier, the meal counts never dropped  
5 below 2,990.

6 There was never a day where there was wicked  
7 snowstorm where half the kids couldn't show up. And that  
8 went on for weeks and weeks, months. There was never a  
9 particular holiday where the meal numbers were cut in half.  
10 All of it just was glaringly obvious.

11 Q. Okay. Now, the sort of common sense reaction you had,  
12 was that the extent of your investigation?

13 A. No.

14 Q. Did you stop and say, oh, they must be guilty. We  
15 should charge them with a crime?

16 A. No.

17 Q. What did you do? What did you and your colleagues,  
18 there's a whole team involved, right?

19 A. Yes.

20 Q. Give me the steps that you and your colleagues took to  
21 investigate the validity of those claims?

22 A. We interviewed people. We interviewed people in  
23 adjacent businesses. We interviewed landlords. Most  
24 importantly, the forensic accountants followed the money and  
25 determined -- I think you will probably hear from them

1       shortly -- the amount of money actually spent on food as a  
2       percentage of the amount of money that these sites received.

3               Surveillance was done. Like I mentioned,  
4       interviews were done. We spoke to other defendants in the  
5       case.

6       Q. How about the rosters? You talked about that earlier.

7       A. Yeah, the rosters, as I mentioned earlier, were analyzed  
8       by someone with that particular set of skills, and they were  
9       able to determine, as I mentioned, Willmar in particular,  
10      that out of all those kids' names compared to the school  
11      district roster in Willmar, under 50 matched, which, again,  
12      I found to be truly unbelievable.

13      Q. Inspector Western, you noted the financial, the money  
14      trail?

15      A. Yes.

16      Q. I know that wasn't your specialty in the investigation;  
17      is that right?

18      A. That's correct.

19      Q. But generally you have some awareness of what was done;  
20      is that right?

21      A. Yes.

22      Q. Early on in the investigation, what steps were taken  
23      with respect to the financial trail?

24      A. Tons of subpoenas went out to -- as new entities got  
25      identified by the forensic accountants, new subpoenas would

1 go out, and they would schedule these bank accounts I  
2 think -- I couldn't even predict or guess how many total  
3 bank accounts there were that they analyzed and followed the  
4 money trail.

5 Q. So, for example, directing your attention back to  
6 Government Exhibit W11, which is that Stigma-Free account,  
7 do you see it on the screen there?

8 A. Yes.

9 Q. You had testified before that the account was opened in  
10 the fall of 2019; is that right?

11 A. Correct.

12 Q. That there was, there had been no activity in it; is  
13 that right?

14 A. That's right.

15 Q. Just a \$5 service fee every month?

16 A. Correct.

17 Q. All the way until January of 2021?

18 A. Yes.

19 Q. And then what happened?

20 A. Um --

21 Q. This is page 32 of the exhibit.

22 A. There was, as you can see down, scroll down a little  
23 bit, four giant deposits totaling over a million and a half  
24 bucks.

25 Q. It looks like there were three deposits on January 15,

1 2021; is that right?

2 A. Correct.

3 Q. Those are the first, to be clear, the first deposits  
4 into the account outside of the \$100 opening deposit in  
5 2019?

6 A. Correct.

7 Q. What was the amount of the three checks deposited into  
8 the Stigma-Free International account on January 15th, 2021?

9 A. You want the total?

10 Q. Yep. No. One at a time.

11 A. Oh, one at a time. January 15th, first deposit,  
12 \$354,870.4040. January 15, second deposit, \$425,209.92.  
13 Thirds deposit on January 15th, \$425,488.16, and then ten  
14 days later on January 25th, another deposit for \$354,456.24.

15 Q. Okay. The forensic accountants traced that money; is  
16 that correct?

17 A. Correct.

18 Q. I know you are not a forensic accountant. You are not a  
19 CPA; is that right?

20 A. Not even close.

21 Q. But it's not hard to trace this account, is it?

22 A. No.

23 Q. You look at page 38. There's one of the checks for  
24 \$125,000?

25 A. Yes.

1 Q. Page 40, \$354,000 deposit?

2 A. Correct.

3 Q. All from Feeding Our Future; is that right?

4 A. That's right.

5 Q. 100 percent?

6 A. Yes.

7 Q. Here on January 25th, another check, \$354,000 from  
8 Feeding Our Future?

9 A. Yes.

10 Q. Signed by Ms. Bock?

11 A. Correct.

12 Q. And then where does the money go a couple days later?

13 A. It goes to Ahmed Artan, Tunyar Trading. I'm sorry.

14 Signed by Ahmed Artan. It goes to Tunyar Trading, their  
15 vendor, who was Mr. Mohamud, Abdikadir Mohamud.

16 Q. Okay. And then that same day there's another check from  
17 Stigma-Free International to Horseed Management LLC; is that  
18 right?

19 A. That's correct.

20 Q. What's the amount of that check?

21 A. \$740,682.85.

22 Q. And remind us, when was Horseed Management LLC created?

23 A. That was created shortly after, a few days after the MDE  
24 instituted that nonprofit change.

25 Q. Okay. And the page before, Tunyar Trading, another also

1 740ish thousand dollars on January 27th, correct?

2 A. Yes, correct.

3 Q. And when was Tunyar Trading created?

4 A. Early October, again shortly after that change and also  
5 right after Stigma-Free changed hands.

6 Q. And then if we look here, a few days later on February  
7 5th, there's a cashier's check for the remaining balance of  
8 \$75,000 to Stigma-Free International; is that right?

9 A. That's correct.

10 Q. What happened to the account?

11 A. It was closed.

12 Q. Who closed the account?

13 A. The bank.

14 Q. U.S. Bank?

15 A. Yes.

16 Q. Why did U.S. Bank close the account?

17 A. I image they were suspicious of the transactions. A  
18 normal course of business, if they get suspicious of  
19 transactions are to shut it down.

20 Q. And that happened in fact on -- look at page 34 of  
21 Government Exhibit W11 on February 5th of 2021; is that  
22 right?

23 A. Correct.

24 Q. Only a few days after that first deposit hit?

25 A. Correct.

1 Q. Now, the forensic accountants traced the money to Tunyar  
2 Trading, Horseed Management and elsewhere; is that right?

3 A. Yes.

4 Q. What generally did they find about how that money was  
5 used?

6 A. It was often sent to other individuals involved and/or  
7 spent on items.

8 Q. Did any of the individuals involved in this case receive  
9 some of the money?

10 A. Yes.

11 Q. Which defendants?

12 A. Mr. Said.

13 Q. And how did he receive his money? Did he have an entity  
14 that he used?

15 A. Yes, he did.

16 Q. What was that entity called?

17 A. Salim Limited.

18 Q. Okay. You got a series of questions there. And Salim  
19 Limited, let me just be clear here. That entity, Salim  
20 Limited, that received funds from other Federal Child  
21 Nutrition Program sites; is that right?

22 A. Yes.

23 Q. And so when you talk about the Safari group or I talk  
24 about the Safari group, what are you referring to? What do  
25 you mean?

1 A. The whole group, the whole anybody connected to that in  
2 their adjacent business entities.

3 Q. And say how were they connected?

4 A. Through ownership.

5 Q. Through the flow of the money?

6 A. Yes.

7 Q. And Ms. Roase and her colleagues will testify in the  
8 trial later about that?

9 A. Yes.

10 Q. Okay. Now Mr. Said's lawyer asked you a series of  
11 questions about Stigma-Free International, I think  
12 suggesting that his client and the Safari guys weren't  
13 really involved in that; is that right?

14 A. Correct.

15 Q. I want to direct your attention to Government  
16 Exhibit F22. And what is this?

17 A. Oh. That is the email Abdulkadir Salah, who is Salim  
18 Said's business partner in Safari, his brother Abdi Salah  
19 sent this to an attorney, Keillen Curtis, discussing how to  
20 transfer the nonprofit to Ahmed Artan.

21 Q. And does Abdulkadir Salah have a connection to the  
22 Safari Restaurant and defendant Said?

23 A. Yes.

24 Q. What is that connection?

25 A. He's a partner.

1 Q. In Safari Restaurant?

2 A. Correct.

3 Q. And is he actually copied on this email from his brother  
4 Abdi Salah?

5 A. Yes.

6 Q. The email itself, does it refer to Abdulkadir?

7 A. Yes, it says, "Per Abdulkadir's conversation."

8 Q. And you also found emails with Mr. Said discussing this  
9 site; is that correct?

10 A. Yes.

11 Q. And I'm showing you now Government Exhibit G28. What is  
12 this email?

13 A. That's an email from Abdikadir Mohamud to Salim Said  
14 regarding Stigma-Free, Willmar September meal documents.

15 Q. Okay. And that's sent to Salim Said?

16 A. Yes.

17 Q. Okay. And what's attached here to this email?

18 A. An invoice for the month of September meal counts.

19 Q. Okay. One of the rosters?

20 A. A roster, yes.

21 Q. Okay. Meal counts?

22 A. Meal counts.

23 Q. The same type of meal counts we saw before?

24 A. Yes.

25 Q. Did Mr. Said also submit meal counts for the Willmar

1 site?

2 A. Yes.

3 Q. I'm showing you Government Exhibit G30. Is that an  
4 email from Salim Said to claims at Feeding Our Future?

5 A. Yes.

6 Q. And what is the subject line?

7 A. September Meal Count, Summer Days.

8 Q. And what's attached to it?

9 A. Meal count -- meal counts.

10 Q. For which site?

11 A. Stigma-Free, Willmar.

12 Q. And we talked about this consulting agreement earlier;  
13 is that right, too?

14 A. Yes.

15 Q. Government Exhibit T4?

16 A. Correct.

17 Q. Consulting agreement between Tunyar Trading and Salim  
18 Limited?

19 A. Yes.

20 Q. That's Mr. Said's company?

21 A. Correct.

22 Q. Agent Western, there was also some conversations about  
23 the Mankato site; is that right?

24 A. Yes.

25 Q. Was that site also tied in with the larger Safari group?

1 A. Yes.

2 Q. How so?

3 A. Again, through Stigma-Free.

4 Q. And you mentioned, who were the individuals that ran the  
5 Stigma-Free, Mankato site?

6 A. Abdinasir Abshir and his brother Asad Abshir.

7 Q. All right. I'd like to show you what's been marked but  
8 not yet admitted as Government Exhibit Y10.

9 Do you recognize that photo?

10 A. Yes.

11 Q. Who is that?

12 A. Mr. Abshir.

13 Q. Mr. Abdinasir, the older --

14 A. Abdinasir, yes.

15 Q. I'm going to show you now what's been marked but not yet  
16 admitted as Government Exhibit Y11.

17 A. Yes.

18 Q. Do you recognize that photo?

19 A. Yes, that's his brother Asad Abshir.

20 MR. UDOIBOK: Your Honor, I move to admit  
21 Government Exhibit Y10 and Y11.

22 THE COURT: Any objection?

23 MR. COLICH: No objection.

24 MR. UDOIBOK: No objection.

25 THE COURT: Y10 and 11 are admitted and may be

1 published.

2 MR. THOMPSON: Thank you, Your Honor.

3 BY MR. THOMPSON:

4 Q. Inspector Western, I'm showing you Y11. Can you just  
5 explain for the record who that is?

6 A. Yeah, that's Asad Abshir.

7 Q. And now Government Exhibit Y10.

8 A. Yeah.

9 Q. Who is that?

10 A. Abdinasir Abshir.

11 Q. Thank you.

12 Inspector Western, to circle back to Ms. Bock,  
13 those meal counts we went through for Stigma-Free, Willmar,  
14 Stigma-Free, Mankato, how were those actually submitted as  
15 claims to Feeding Our Future?

16 A. Via email.

17 Q. I'm going to show you V21. Do you recognize Government  
18 Exhibit V21?

19 A. Yeah.

20 Q. And what is this system again?

21 A. CLiCS.

22 Q. Okay. And what is CLiCS?

23 A. CLiCS is the interface that they submit the meal counts  
24 through.

25 Q. Who submits the meal counts?

1 A. Feeding Our Future.

2 Q. Okay. And these are, this one happens to be page 1 is  
3 the meal counts for Stigma-Free, Mankato for September 2021;  
4 is that right?

5 A. Correct.

6 Q. And what's the average daily attendance for that month  
7 at that site?

8 A. 1,997.

9 Q. And at the bottom there's this sponsoring authority  
10 certification; is that right?

11 A. Right.

12 Q. And we read this before; is that right?

13 A. I did.

14 Q. Before submitting, does someone have to certify these  
15 claims?

16 A. Yes.

17 Q. And specifically it says, "I hereby take full  
18 responsibility for ensuring that this claim accurately  
19 represents the number of meals/milks served by reimbursement  
20 category, that records are available to support this claim,  
21 that this claim is in accordance with the program agreement,  
22 and that payment therefore has not been received."

23 Is that right?

24 A. That's correct.

25 Q. The last sentence continues. It says, "I understand

1 that this information is being given in connection with the  
2 receipt of federal funds, that officials from the U.S.  
3 Department of Agriculture and the Minnesota Department of  
4 Education may verify this information and that deliberate  
5 misrepresentation may subject me to prosecution under  
6 applicable state and federal criminal statutes."

7 Is that right?

8 A. Correct.

9 Q. It says that officials from the U.S. Department of  
10 Agriculture and the Minnesota Department of Education may  
11 verify this information; is that right?

12 A. Correct.

13 Q. Could you explain that?

14 A. Yeah. They may audit them.

15 Q. Okay. There was -- Mr. Udoibok asked you some questions  
16 about whether or not MDE approved these claims, these  
17 submissions, and you said no, they processed them.

18 A. Yeah.

19 Q. What's the distinction?

20 A. The distinction is the certification. The whole idea of  
21 a sponsor is, they're the ones that go through and approve  
22 everything. And once this is submitted, MDE takes their  
23 word for them, and they pay them.

24 Q. Whose word do they take for it?

25 A. The sponsor. That's their job.

1 Q. Ms. Bock?

2 A. Yes.

3 Q. And you said it's their job. Was Ms. Bock and her  
4 company compensated for being a sponsor?

5 A. Yes.

6 Q. How was that?

7 A. They got an administrative fee.

8 Q. What was the amount of the administrative fee?

9 A. It was suggested 10 to 15 percent of the submission.

10 Q. They got to keep 10 percent, 10 to 15 percent of what?

11 A. Of the payments.

12 Q. The total amount of claim?

13 A. Claims, yes.

14 Q. So the higher the claim, the higher the --

15 A. Compensation.

16 Q. The higher the compensation?

17 A. Yes.

18 Q. In 2021 how much did Ms. Bock and her company, how much  
19 did sites under her sponsorship receive?

20 A. 2021, 200 million.

21 Q. Her company received 10 to 15 percent of that?

22 A. Correct.

23 Q. For sponsoring and certifying those claims?

24 A. Correct.

25 MR. THOMPSON: Thank you. No further questions.

1 THE COURT: Mr. Udoibok, recross.

2 MR. UDOIBOK: Yes.

3 Thank you.

4 Ms. Mallet, would you call up Exhibit V21.

5 RECROSS-EXAMINATION

6 BY MR. UDOIBOK:

7 Q. Inspector, you testified about V21, correct?

8 A. Correct.

9 Q. And call out the last column there, the total attendance  
10 and average attendance. Bottom, the last. There you go.

11 By the way, which exhibit is this? It's CLiCS,  
12 right?

13 A. CLiCS, right.

14 Q. And you know how CLiCS operated. Feeding Our Future  
15 inputs this data into CLiCS and then sends it to MDE,  
16 correct?

17 A. Correct.

18 Q. All right. And then MDE approve, MDE approves or not?

19 A. MDE pays.

20 Q. Yes. All right. But is there any approval process  
21 between sending CLiCS to MDE in any way?

22 A. Approval by?

23 Q. By MDE.

24 A. No. They accept it based on that attestation. They  
25 accept that the information is correct, and they pay it.

1 Q. Do you know whether the word "approve" is used at all  
2 when site application is sent by Feeding Our Future to MDE?

3 A. No. I think they leave that up -- you know, I don't  
4 know.

5 Q. All right. Maybe this might help. I think this is  
6 already in evidence regarding Mankato.

7 Look at V, like in victor, 18.

8 Is that -- now that's the Stigma-Free  
9 International, Mankato, correct?

10 A. Correct.

11 Q. And, Ms. Mallet, would you call out the site  
12 information.

13 And do you see April 2020 through April 2021?

14 A. Yeah.

15 Q. And it's approved, correct?

16 A. Yeah.

17 Q. All right.

18 I think that said October 2020 through April 2021.

19 I believe you testified --

20 Now, Ms. Mallet, would you call up W11. Go to  
21 page 43, if it's the same page that I have. See it's off.  
22 Go to the next page, because mine is off.

23 MR. THOMPSON: Can I do it?

24 MR. UDOIBOK: Sure.

25 MS. MALLET: Yeah, you better.

1 MR. UDOIBOK: V11 page. All right. Thank you.

2 No. That's fine.

3 So the check, this check is not written by, is not  
4 drawn by Feeding Our Future, is it?

5 THE WITNESS: No. This is, this is from the  
6 account of Stigma-Free International.

7 BY MR. UDOIBOK:

8 Q. All right. Now let's go to page 45. It may be the same  
9 thing. All right.

10 And this is also not a Feeding Our Future check.

11 A. That's correct. Again, it's a Stigma-Free  
12 International.

13 Q. And Feeding Our Future based on your investigation does  
14 not have, did not have access to Stigma-Free International  
15 banking?

16 A. No, I don't imagine they have access to their account.

17 Q. All right. Thank you, counsel.

18 I want to talk about -- just a moment. There's a  
19 series of questions that you have, that you had from counsel  
20 Mr. Thompson.

21 You testified that Feeding Our Future was a  
22 gatekeeper, correct?

23 A. In my words, yeah.

24 Q. And in fact you, you stated that as the gatekeeper would  
25 review the application, correct?

1 A. Yes.

2 Q. And Feeding Our Future reviewed application, turned them  
3 in to MDE as in V, I believe V20 that we reviewed, and  
4 there's an approval.

5 MR. THOMPSON: Your Honor, I'm sorry. He's  
6 misstating the claims versus the application.

7 THE COURT: Sustained.

8 MR. UDOIBOK: All right.

9 BY MR. UDOIBOK:

10 Q. I want, I want -- I don't want to have any confusion.

11 In the claims application, you testified that  
12 Feeding Our Future must review the application?

13 MR. THOMPSON: Your Honor --

14 MR. UDOIBOK: Right?

15 MR. THOMPSON: Objection. He didn't testify to  
16 that at all. It's far beyond the scope.

17 THE COURT: Sustained.

18 BY MR. UDOIBOK:

19 Q. Officer, you listed a series of conditions as a  
20 gatekeeper. One was application, correct?

21 MR. THOMPSON: Objection. Misstates the  
22 testimony.

23 THE COURT: The jury will recall the testimony.

24 You can answer, if you will.

25 THE WITNESS: Can you repeat that?

1 BY MR. UDOIBOK:

2 Q. You said Feeding Our Future was a gatekeeper, correct?

3 Did you say that or not?

4 A. Yeah.

5 Q. All right. And as a gatekeeper, you review application?

6 A. Yeah, they require people to fill out an application,  
7 correct.

8 Q. What application would have been, was that, that you  
9 were referring to?

10 A. The paperwork we went through.

11 Q. The paperwork that included the meal count, correct?

12 A. That's not the application.

13 Q. What application?

14 A. Well, you and I went through a document on here where I  
15 believe Aimee and Artan both signed, and it had --

16 Q. Well, this does, does -- all right. Let's, maybe it  
17 will be helpful. Why don't you call up V20. It's already  
18 in evidence. Let's go page -- it's only eight pages.

19 Go back to the previous page. All right. Circle  
20 1500 in the middle of that.

21 MR. THOMPSON: Objection, Your Honor. Beyond the  
22 scope. The inspector did not testify to this exhibit.

23 THE COURT: Sustained.

24 MR. THOMPSON: On direct or redirect.

25 THE COURT: Sustained.

1 BY MR. UDOIBOK:

2 Q. All right. Do you know what is entailed in the CLiCS  
3 site application?

4 A. A CLiCS, like the interface CLiCS?

5 Q. Yeah, this CLiCS. You testified to 21, didn't you?

6 A. I testified to?

7 Q. Exhibit 21.

8 A. Just a little radio button that said it was approved.

9 Q. Yes. But my question, though, you testified that  
10 Feeding Our Future must review application. I'm trying to  
11 determine what constitutes application.

12 MR. THOMPSON: Objection, Your Honor. He read  
13 from the certification signed by Ms. Bock along with every  
14 claim.

15 THE COURT: Sustained.

16 BY MR. UDOIBOK:

17 Q. What do you mean by "application"?

18 A. The application that they fill out with their address,  
19 et cetera.

20 Q. All right.

21 A. Name of business.

22 Q. Go ahead.

23 A. Name of the business, address. I believe we went  
24 through some of those documents.

25 Q. I just want to -- I don't want to misstate what your

1 testimony is.

2 A. Yeah.

3 Q. All right. Does that application include the meal  
4 count?

5 A. No. The application is to get into the program.

6 Q. All right.

7 A. Meal counts are to get paid.

8 Q. Does the application also include -- just a second here.  
9 I want to get the right language to understand.

10 Does the application, whether you know or not,  
11 tell me whether you know. You may not know it.

12 In the application from the site to participate in  
13 the program, does it include the estimated amount of food  
14 that the site is expected to produce?

15 A. Yeah, I think we looked at that earlier, and it said  
16 500.

17 Q. And that all the sites based on your investigation have  
18 only 500?

19 A. No. The two we looked at today.

20 Q. Some had more, correct?

21 A. I'm not familiar with that. I didn't look at all those.

22 Q. Fair enough. That estimated amount was sent, correct,  
23 to MDE?

24 A. I don't know what they did with those documents.

25 Q. All right. So your testimony is, you don't know whether

1 the site, the expected amount of food to be produced by site  
2 is sent to the MDE -- or to MDE or not. You don't know  
3 that, do you?

4 A. I don't know that.

5 Q. All right. Thank you.

6 So when you say that the amount is outrageous, you  
7 are saying it based on your own experience, not, not based  
8 on knowledge of MDE, correct?

9 MR. THOMPSON: Objection, Your Honor. He  
10 testified it's based on the investigation repeatedly.

11 THE COURT: Sustained.

12 BY MR. UDOIBOK:

13 Q. You testified as to the amount that you believe is  
14 outrageous, correct?

15 A. Correct.

16 Q. And you derived that from your investigating all the  
17 sites, correct?

18 A. Correct.

19 Q. Did you also have any investigation about the rules at  
20 MDE?

21 A. Me particularly?

22 Q. Yes.

23 A. No, I didn't. The rules didn't come into my equation.

24 Q. So as you sit here today, you don't know whether the  
25 amount, you use 500, is reasonable based on MDE's own rules,

1 do you?

2 MR. THOMPSON: Objection, Your Honor. Object.  
3 This is, it is misstating his testimony. It's  
4 mischaracterizing his testimony, and it sounds like this is  
5 a question best asked of MDE.

6 THE COURT: I'm going to overrule.  
7 You may answer.

8 THE WITNESS: Can you repeat that?

9 MR. UDOIBOK: I can't. I will put it a different  
10 way. All right.

11 BY MR. UDOIBOK:

12 Q. You never investigated what the rules are with MDE, did  
13 you?

14 A. I don't know the specific -- I don't know if there are  
15 MDE rules about the number of meals served a day at a  
16 particular site.

17 Q. All right. It's just based on what you believe it ought  
18 to be.

19 MR. THOMPSON: Objection, Your Honor. It's based  
20 on his investigation. He's testified to this repeatedly.

21 THE COURT: Is it asked and answered?

22 MR. THOMPSON: Asked and answered.

23 THE COURT: Sustained.

24 MR. UDOIBOK: No further questions.

25 THE COURT: Mr. Colich.

1 MR. COLICH: I have nothing further, Your Honor.

2 THE COURT: Mr. Thompson.

3 MR. THOMPSON: Yes.

4 REDIRECT EXAMINATION

5 BY MR. THOMPSON:

6 Q. Inspector Western, is there a law, if one was to submit  
7 a fraudulently inflated meal count number claim to the state  
8 Department of Education in order to get a large payment to  
9 which you were not entitled, is there a law that prohibits  
10 that?

11 A. Yes.

12 MR. UDOIBOK: Objection. Argumentative. Legal  
13 conclusion. Assumes facts not in evidence.

14 THE COURT: Overruled.

15 The answer will stand.

16 MR. THOMPSON: If you submit that claim via email,  
17 what's the law that you've violated?

18 THE WITNESS: Wire fraud.

19 MR. THOMPSON: Thank you.

20 No other questions.

21 THE COURT: You may step down, sir. Thank you.

22 Members of the jury, we're going to end here for  
23 the day. And so I'll have everyone rise for the jury.

24 4:45 p.m.

25

**IN OPEN COURT****(JURY NOT PRESENT)**

1 THE COURT: You may all be seated.

2 Before we break for the day, I just wanted to  
3 reiterate a couple of rules that impacted today.

4 First, there should be no codefendant attending  
5 the trial who sits anywhere near the jury. So any  
6 codefendant attending the trial shall sit near the aisle if  
7 they come into the courtroom.

8 We are trying to get ahold of those attorneys who  
9 are representing codefendants to inform them of this rule.

10 Mr. Said and Ms. Bock, you are not to talk to any  
11 witness or codefendant for the duration of the trial at all  
12 for any purpose. Doing so risks your pretrial release.

13 I am having the marshals come up to speak to me  
14 about the incident in the hallway today. So I'm going to  
15 break early to talk with the marshal about that. And I'll  
16 get the government's input on who else should be present  
17 during that conversation.

18 Mr. Udoibok.

19 MR. UDOIBOK: Your Honor, I need some clarity.

20 This rule, does it relates to the attorneys,  
21 because I have an investigator that I may want to talk to  
22 witnesses and even defendants who will be coming to testify  
23 on behalf of the government.  
24  
25

1 I'm -- I just want to make sure I don't run afoul.

2 THE COURT: Is your investigator also a potential  
3 witness?

4 MR. UDOIBOK: No.

5 THE COURT: Then I don't see an issue with it.

6 MR. UDOIBOK: Okay.

7 THE COURT: I mean, I just want to be clear.  
8 Witness tampering is a crime and a serious one. And that's  
9 what we're trying to prevent here. I don't know what  
10 occurred today, but I am going to find out.

11 MR. THOMPSON: Your Honor, if I may?

12 THE COURT: You may.

13 MR. THOMPSON: I hate that I find myself in this  
14 situation once again, but we've learned some more  
15 information about what happened, and that is that Abdinasir  
16 Abshir approached a witness this afternoon who is scheduled  
17 to testify for the government.

18 He arrived, as Your Honor noticed, right after  
19 lunch, right when the government was talking about his  
20 Stigma-Free, Mankato site.

21 That's the second time at trial that defendants  
22 involved with the Safari group of individuals have appeared  
23 in court while the government was talking about their site.  
24 Last week you may recall that Abdihakim Ahmed and Ahmed  
25 Ghedi appeared in court while the government was talking

1 about their site that they ran with Mr. Said, ASA Limited.

2 From what happened, it appears pretty clear to us  
3 that Mr. Said is communicating with his codefendants about  
4 the contents of this courtroom testimony and so they can  
5 come when it's of note to them.

6 And so we would ask that you take his phone into  
7 custody so we can get a warrant for it with appropriate  
8 taint protocol to see whether or not he communicated with  
9 Abdinasir Abshir over the lunch break about the testimony.

10 You may recall we broke for lunch, Your Honor, and  
11 I indicated that we would be moving on to talk about the  
12 Stigma-Free, Mankato site after lunch, which is when  
13 Mr. Abshir showed up, Defendant Abshir.

14 So I would ask that Your Honor order Mr. Said to  
15 turn his phone over so we can get a warrant for it and seize  
16 it as evidence.

17 THE COURT: Mr. Colich, where is your client's  
18 phone?

19 MR. COLICH: I don't know.

20 DEFENDANT SALIM SAID: It's at the office, ma'am.

21 MR. COLICH: We've directed him not to bring a  
22 phone to this courtroom.

23 Let me talk. You -- hey.

24 THE COURT: Where did you go over lunch? Did you  
25 go anywhere over lunch?

1 DEFENDANT SALIM SAID: Who? Me?

2 THE COURT: Did you go anywhere over lunch?

3 DEFENDANT SALIM SAID: I just went outside to  
4 smoke in the place around the building. I came back inside.

5 MR. COLICH: You answered that. You answered.

6 Your Honor, I would note that we have, in an  
7 effort to make sure that Mr. Said isn't accused of  
8 something, we've taken precautions in talking with him about  
9 what he should or shouldn't be doing in the courtroom, as  
10 well as what he should be bringing to the courtroom or to  
11 this courthouse.

12 To the best of our knowledge, every evening he  
13 walks with us back to our office, and he goes in and  
14 retrieves his coat and his phone.

15 THE COURT: All right.

16 MR. THOMPSON: Your Honor, I will note that there  
17 was several individuals that passed through security this  
18 morning, along with a member of our team who is not here in  
19 court. They indicated that they were here related to this  
20 trial. They have not appeared in the courtroom at all  
21 today.

22 So there's people in the courtroom -- or in the  
23 courthouse on behalf of Mr. Said that haven't been coming  
24 here.

25 I question why they are here, and I don't know

1 what to do, but I have a responsibility to the court to make  
2 everyone aware. And I take no pleasure in this. In fact,  
3 it makes me sick to my stomach, but here we find ourselves  
4 again with people trying to corrupt our process.

5 There's people in the courtroom. Someone sat down  
6 with one of our agents on the case while he was having  
7 breakfast this morning in a way that was clearly someone  
8 here with Mr. Said to talk to him.

9 And I don't know what's going on, but something is  
10 going on, and we have to stop it.

11 THE COURT: All right. I'm going to need more  
12 information, and I'm going to get it.

13 If Mr. Said's phone isn't in the courtroom, I'm  
14 not going to seize it. I may do so in the future, depending  
15 on what we find.

16 And I think, as you know, Mr. Said, the government  
17 will be able to tell if there's anything deleted from your  
18 phone from today forward.

19 So you are under a "do not delete" order on your  
20 phone. And if I determine that there is evidence enough to  
21 seize it, I will order it seized.

22 I can't determine that right now given the  
23 information that I have that you haven't been in  
24 Mr. Colich's office since last evening.

25 As to the ongoing investigation, I'm going to now

