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UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America,)	
)	File No. 22-cr-223
Plaintiff,)	(NEB/DTS)
)	
v.)	
)	Courtroom 13W
Aimee Marie Bock(1),)	Minneapolis, Minnesota
Salim Ahmed Said(3),)	Tuesday February 25, 2025
)	9:04 a.m.
Defendants.)	
)	

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

VOLUME X - JURY TRIAL PROCEEDINGS

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

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Proceedings recorded by mechanical stenography;
Transcript produced by computer.

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* * *

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1 Mr. Jacobs, you may inquire.

2 MR. JACOBS: Thank you, Your Honor.

3 DIRECT EXAMINATION

4 BY MR. JACOBS:

5 Q. Good morning, Mr. Driscoll.

6 A. Good morning.

7 Q. Could you please tell the jury where you are currently
8 employed.

9 A. Yes, I work at Wells Fargo.

10 Q. And for any of us that don't know what Wells Fargo is,
11 what is Wells Fargo?

12 A. Wells Fargo is a bank.

13 Q. And how long have you worked at Wells Fargo?

14 A. I've worked at Wells Fargo since 2012.

15 Q. What is your current role at Wells Fargo?

16 A. My current title is a business execution consultant.

17 Q. And what does that mean?

18 A. Generally means I assist with all things kind of legal.
19 My title would be litigation research and support, so
20 anything the bank needs me to do for research.

21 Q. And as part of that role, do you come to court and
22 testify on behalf of Wells Fargo?

23 A. Yes, that's also part of it, along with small claims
24 court.

25 Q. About Wells Fargo?

1 A. Yes.

2 Q. Okay. I want to talk today about checks. All right?

3 A. Right on.

4 Q. And in particular I want to focus on two different types
5 of checks, cashier's checks and what I'll call a regular
6 check.

7 A. Okay.

8 Q. Let's talk about regular checks first. Okay? What's a
9 check?

10 A. A check would be a means of giving someone or
11 transferring funds from one person to another. So if you
12 needed to pay a bill or pay a person, you would write a
13 check to them.

14 That essentially would transfer the funds from
15 your account into theirs.

16 Q. One checking account to another checking account?

17 A. Correct.

18 Q. All right. What is a cashier's check?

19 A. A cashier's check is a similar idea, except for what you
20 need to do to make a cashier's check is, you need to request
21 that from the bank. You need to request a cashier's check.

22 And by doing that, you are immediately withdrawing
23 the funds from your own account and essentially placing them
24 in a Wells Fargo cashier's check account, which makes that
25 cashier's check guaranteed. So then when the person that

1 receives it, they know those funds are guaranteed by the
2 bank.

3 Q. So Wells Fargo is standing behind that cashier's check?

4 A. Correct.

5 Q. It can't bounce?

6 A. Correct.

7 Q. In order to get a cashier's check, do you have to have
8 an account at Wells Fargo?

9 A. You do, yes.

10 Q. And can you explain the process of obtaining a cashier's
11 check?

12 A. Well, you would go into the branch. You would need to
13 present, you need to authenticate yourself as you're a bank
14 account holder. Generally that would be done by a PIN
15 validation, a PIN, swiping the card and using the PIN, along
16 with the ID, your government issued ID.

17 And then you withdraw the funds from your account
18 and tell the teller who you want the check made out to.
19 They would then hand you a physical cashier's check.

20 Q. Okay. I want to take a step back and you about
21 something called the Federal Deposit Insurance Corporation.
22 Are you familiar with that entity?

23 A. Yes, I am.

24 Q. If I call it the FDIC, do you know what I'm talking
25 about?

1 A. Yes.

2 Q. What is the Federal Deposit Insurance Corporation or
3 FDIC?

4 A. FDIC insurance is something that Wells Fargo has on the
5 accounts, all of the accounts that we have.

6 Generally what it means is, if something were to
7 happen to Wells Fargo, like we were to go under, be out of
8 business, the account holder's money is insured by that
9 corporation.

10 Q. So think It's a Wonderful Life bank run scene.

11 A. That's exactly right.

12 Q. The FDIC stands behind those accounts.

13 A. Exactly.

14 Q. And this maybe apparent from the "F" in FDIC, but is it
15 a federal program?

16 A. Yes.

17 Q. And Wells Fargo participates in the FDIC?

18 A. That is correct.

19 Q. And do all Wells Fargo checking accounts, are they FDIC
20 insured?

21 A. That is correct, yes.

22 Q. Meaning that the Federal Depository Insurance
23 Corporation stand behind -- stands behind those accounts?

24 A. Exactly. That would be one of the benefits of banking
25 with Wells Fargo is you get FDIC insurance.

1 Q. I want to show you what is marked but not in evidence
2 yet as Z44. Is Z44 a check from a Wells Fargo account?

3 A. Yes, this is.

4 MR. JACOBS: Your Honor, we would offer Government
5 Z44.

6 MR. UDOIBOK: No objection.

7 MR. MONTEZ: No objection.

8 THE COURT: Z44 is admitted.

9 My understanding is we submitted a number of the Z
10 yesterday, and the clerk will remind me of how many.

11 All of them?

12 So the Z series is all in.

13 BY MR. JACOBS:

14 Q. All right. Looking at Z44, which corresponds to
15 government Count 44, can you tell the jury what this is?

16 A. This would be a personal check from a Wells Fargo
17 checking account. The account holder here at the bottom
18 left would be Anisa Checchekani.

19 Q. Checchekani?

20 A. Yes, Checchekani.

21 Q. So let's just go over a few things. It's a Wells Fargo
22 check, so is this account FDIC insured?

23 A. Yes, it is.

24 Q. And this check is made out to Feldman Imports; is that
25 correct?

1 A. That is correct.

2 Q. And are you aware of what Feldman Imports is?

3 A. I am not aware of what that is, no.

4 Q. And the amount is how much?

5 A. \$60,000.

6 Q. And what is the date of this check?

7 A. The date this was written was March 4th, 2021.

8 Q. Okay. From an FDIC insured account?

9 A. From an FDIC insured account.

10 Q. All right. Now let's talk about cashier's checks. And
11 I'm pulling up what's already in evidence as Z51, which
12 again corresponds to government Count 51. And I'm going to
13 the second page.

14 Can you tell the jury what we're seeing on the
15 second page there?

16 A. Yes. This is what we would describe in the bank as an
17 offset for a cashier's check.

18 Q. What's an offset?

19 A. Essentially it's the receipt for the cashier's check or
20 the balance. The customer receives the cashier's check, and
21 this would be our recordkeeping of that cashier's check in
22 the bank.

23 Q. Okay. For this particular cashier's check, I want to
24 talk through some of the details.

25 First, who is the purchaser of this cashier's

1 check?

2 A. The purchaser of this cashier's check is Salim Said.

3 Q. And what is the date that it was issued?

4 A. The date issued is October 8th, 2021.

5 Q. And this particular cashier's check is made payable to
6 the order of what?

7 A. Micasa, LLC.

8 Q. All right. And the amount on this cashier's check is
9 how much?

10 A. 178,000.

11 Q. And was this cashier's check drawn on a Wells Fargo
12 account?

13 A. Yes.

14 Q. And was that Wells Fargo account FDIC insured?

15 A. Yes.

16 Q. Moving on to the third page here. Another offset?

17 A. That is correct.

18 Q. Let's go through the details of it. The date issued
19 here is what?

20 A. July 28th, 2021.

21 Q. And paid to the order of?

22 A. It's Results Title.

23 Q. And again this check is, this cashier's check is in the
24 amount of how much?

25 A. \$702,000.

1 Q. And the purchaser is whom?

2 A. Salim Said.

3 Q. And, again, was this drawn on a Wells Fargo checking
4 account?

5 A. Yes, it was.

6 Q. Was that checking account FDIC insured?

7 A. Yes, it is.

8 Q. All the accounts that we're talking about today have
9 been FDIC insured?

10 A. Yes.

11 MR. JACOBS: Your Honor, no further questions for
12 this witness.

13 THE COURT: Cross-examination, Mr. Udoibok?

14 MR. UDOIBOK: None.

15 THE COURT: Mr. Montez or Mr. Colich?

16 MR. MONTEZ: No questions, Your Honor.

17 THE COURT: Thank you.

18 Sir, you may step down.

19 THE WITNESS: Thank you.

20 THE COURT: And the government may call its next
21 witness.

22 MR. JACOBS: The government calls Robert
23 Blackmore.

24 THE COURT: Good morning, sir. I will have you
25 come all the way up to the witness stand.

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ROBERT BLACKMORE,

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

THE WITNESS: Yes, I do.

THE COURT: Thank you. You may be seated.

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

THE WITNESS: Yes, Your Honor. My name is Robert Blackmore. R-O-B-E-R-T B-L-A-C-K-M-O-R-E.

THE COURT: Thank you.

Mr. Jacobs, you may inquire.

MR. JACOBS: Thank you, Your Honor.

DIRECT EXAMINATION

BY MR. JACOBS:

Q. Good morning, Mr. Blackmore.

A. Good morning.

Q. Where do you currently work?

A. I work for the Minnesota Department of Natural Resources.

Q. And what do you do for the Minnesota Department of Natural Resources?

A. I work as a senior investigator, and I investigate employee misconduct cases.

Q. How long have you worked there?

1 A. About six months.

2 Q. Prior to that employment, where did you work?

3 A. Immediately before this job, I was retired, but prior to
4 that I worked for the Federal Bureau of Investigation as a
5 special agent.

6 Q. How long were you a special agent with the FBI?

7 A. 22 years.

8 Q. And can you briefly describe to the jury what your
9 duties and responsibilities were as a special agent with the
10 FBI?

11 A. When I was employed as a special agent, I was generally
12 the case agent on a number of different cases that I worked
13 over the years. I primarily worked crimes against children.

14 As the case agent, I was responsible for all
15 aspects of the case, securing warrants and other legal
16 process, insuring the interviews were done, evidence was
17 collected in an appropriate manner, review that evidence,
18 and present my findings to the U.S. Attorney's Office.

19 Q. I want to direct your attention now to this particular
20 case. Okay?

21 At some point, did you assist in the investigation
22 in this case?

23 A. Yes, I did.

24 Q. How so?

25 A. I was a member of a search warrant team at Aimee Bock's

1 residence.

2 Q. And was that at the address 13299 Bronze Parkway in
3 Rosemount, Minnesota?

4 A. Yes.

5 Q. When you worked as a special agent with the FBI over the
6 course of your 22 years, have you executed search warrants
7 at residences before?

8 A. Many times.

9 Q. Approximately how many?

10 A. Between the cases that I was the case agent for and
11 others that I assisted on, probably over 100.

12 Q. Okay. And are you familiar with the policies and
13 procedures of the FBI relating to searches?

14 A. As they were when I retired, yes.

15 Q. So I want to direct your attention now to January of
16 2022 and the search of that residence. Okay?

17 A. Sure.

18 Q. Did you participate in the search of that house?

19 A. Yes, I did.

20 Q. And can you explain to the jury what your role was in
21 the search of that house?

22 A. Initially, I was on what was called the entry team,
23 which conducts a knock and announce when a warrant is
24 served. Then we go in, and we clear the residence to make
25 sure it's safe for the team to enter.

1 After that's done, we begin the process of
2 searching the residence.

3 Q. Was this search on January 20th of 2022?

4 A. Yes.

5 Q. The same day that searches took place at other
6 businesses and residences throughout Minnesota?

7 A. Correct.

8 Q. Was this search pursuant to court authorization?

9 A. Yes, we got a search warrant.

10 Q. And approximately how many agents were involved in the
11 search of this residence?

12 A. I don't recall exactly how many, but I would probably
13 guess about a dozen. I don't know for sure.

14 Q. And can you explain the different roles that agents
15 would have had from a high level in the search?

16 A. Sure. I mean, after the entry is made and the premises
17 is secured, there's usually one person that's designated as
18 the search team leader who is responsible for coordinating
19 who goes into what room to look for what.

20 There's usually a team that's assigned to do
21 interviews. There's a photographer to take what we call
22 entry and exit photos during search warrant. There's
23 usually someone there that acts as the official evidence
24 custodian and to log the evidence in on the paperwork and
25 make sure it gets entered into the evidence room.

1 Those are among the duties that we do.

2 Q. And at this search, did you and other agents actually
3 seize evidence from the residence?

4 A. Yes, we did.

5 Q. And at a high level, what different types of evidence
6 did you seize?

7 A. There were several pieces of electronic evidence,
8 computers, laptops, cell phones. There were documents. I
9 believe there was cash and jewelry as well.

10 Q. I'm showing you what has been marked but not admitted
11 into evidence as BB1. Do you recognize this document?

12 A. Yes, I do.

13 Q. And what is it?

14 A. That is the standard cover sheet we use when we take
15 photographs at a search warrant scene. It's usually the
16 very first photo that is taken, and it documents the case
17 name, the date, the location, and the person who is in
18 charge of taking and documenting the photographs.

19 Q. I'm just going through a few of these. What are these
20 photos?

21 A. Those are different pictures, both of the interior and
22 exterior of the search residence.

23 Q. Taken the day of the search?

24 A. Yes.

25 MR. JACOBS: Your Honor, the government offers

1 BB1.

2 MR. UDOIBOK: No objection.

3 MR. MONTEZ: No objection.

4 THE COURT: BB1 is admitted.

5 BY MR. JACOBS:

6 Q. Okay. Mr. Blackmore, the jury is now looking at the
7 sheet you were talking about. This is the cover sheet you
8 mentioned?

9 A. Yes.

10 Q. I want to walk through some of the photographs. Okay?

11 A. Yeah.

12 Q. Go to the second page. What are we looking at?

13 A. That is the exterior of the search location of the
14 residence.

15 Q. And flipping through, can you just briefly explain to
16 the jury what we are seeing?

17 A. That would have been the hallway right inside the front
18 entry to the residence, going back towards a living, kitchen
19 area. And there's a stairway going to the second floor on
20 the left-hand side of the photograph.

21 Q. On to page?

22 A. Would be the kitchen area.

23 Kitchen, dining, living area on the first floor.

24 The living area.

25 One of the bedrooms.

1 Q. We're on page 7 here. This is the primary bedroom?

2 A. It's one of the bedrooms, yes.

3 Q. And moving on to page 8, can you tell the jury what we
4 see here?

5 A. I see a cell phone on the bed, and on the floor next to
6 the bed there is a laptop computer and what appears to be a
7 designer handbag of some sort.

8 Q. Okay. So here on the bed, that's a phone?

9 A. Yes.

10 Q. Was that phone searched and seized?

11 A. Yes.

12 Q. Computer on the floor. Let me enlarge that. Was that
13 computer searched and seized?

14 A. Yes.

15 Q. Going on to page 9, another photograph of the computer?

16 A. Correct.

17 Q. Page 10. What is this?

18 A. That's the nightstand drawer next to the bed with the
19 drawer open and what appears to be, up towards the front of
20 the drawer, what appears to be a large amount of cash.

21 Q. And moving on to page 11, can you tell the jury what
22 we're seeing?

23 A. That's the bed in the bedroom we've seen previously.

24 The handbag is on the bed, and there is cash and jewelry
25 laid out in the same area.

1 Q. Page 12, a similar picture?

2 A. Yes.

3 Q. Familiar with the designer of that bag? I am almost
4 scared to ask.

5 A. I believe that is Gucci.

6 Q. Okay. Page 13?

7 A. Some jewelry that was located.

8 Q. Page 14?

9 A. Cufflinks, what appear to be cufflinks and jewelry.

10 Q. Can you make out the name? It looks like a custom
11 necklace. Can you make out the name?

12 A. It says, "Aimee."

13 Q. Moving on to page 15, what do we see here?

14 A. That is a closet I believe in the bedroom we've just
15 seen, and I see a safe on the right-hand side and a set of
16 car keys and what looks to be another designer purse of some
17 sort.

18 Q. Page 16. What are we looking at?

19 A. Jewelry and watch.

20 Q. Page 17?

21 A. That is the safe that was in the closet we just saw.
22 It's open. There appears to be some cash down at the bottom
23 and some sort of gift box above it.

24 Q. Okay. Moving on to page 18. It looks like a close-up
25 of some items in the closet?

1 A. Yeah, it looks like a designer handbag.

2 Q. Louis Vuitton?

3 MR. UDOIBOK: Objection.

4 THE WITNESS: I don't know the logo.

5 THE COURT: Overruled as to leading.

6 BY MR. JACOBS:

7 Q. Another handbag?

8 A. Yes.

9 Q. Same closet?

10 A. Yes.

11 Q. What do we see here?

12 A. It looks like a box from Gucci.

13 Q. Maybe a shoebox?

14 A. I believe so, yeah.

15 Q. Okay. Moving on to page 21, what are we looking at?

16 A. That's a living/recreation area inside the house.

17 Q. Page 22?

18 A. It looks like a women's winter coat.

19 Q. Tag still on?

20 A. Yes.

21 Q. Page 23?

22 A. That's the tag on the coat.

23 Q. Okay. Page 24 is the garage?

24 A. Yes, it is.

25 Q. What do you see?

1 A. A Mercedes Benz vehicle, white in color.

2 Q. Back of the same vehicle?

3 A. Yes, that's the same vehicle. It's got a temporary tag
4 on it.

5 Q. And what is page 26?

6 A. That's the rear of the vehicle. The back hatch or trunk
7 area is opened, and those are the contents that were in the
8 trunk of the car.

9 Q. Now we're moving on to outside the house. Is this the
10 driveway?

11 A. Yes, it is.

12 Q. Another car parked in the driveway?

13 A. Yes.

14 Q. Same, a photograph of that same car?

15 A. Correct.

16 Q. Okay. Moving on to page 29, what is this?

17 A. That's a three-ring binder that was located during the
18 execution of the search warrant.

19 Q. Okay. It says Program Policies, Procedures and Program
20 Records for Rule 3?

21 A. Yes.

22 Q. Mr. Blackmore, you talked earlier about the different
23 types of evidence that were seized from the house, and you
24 mentioned there was documentary evidence.

25 Prior to testifying today, did you have a chance

1 to review some of that evidence?

2 A. Yes, I did.

3 Q. And was Government's Exhibit BB2, BB3 and BB9 some of
4 that documentary evidence that was seized from the house?

5 A. Yes, it was.

6 MR. JACOBS: Your Honor, the government would
7 offer BB2, BB3 and BB9.

8 THE COURT: Any objection?

9 MR. UDOIBOK: Just a moment.

10 (Counsel confer)

11 MR. UDOIBOK: No objection.

12 THE COURT: Any objection?

13 MR. MONTEZ: No objection.

14 THE COURT: BB2, 3 and 9 are admitted.

15 BY MR. JACOBS:

16 Q. All right. Mr. Blackmore, you also talked about a
17 different category of evidence, digital evidence, that was
18 seized.

19 A. Yes.

20 Q. The cell phone and the computer?

21 A. Yes.

22 Q. And prior to your testimony today, did you have an
23 opportunity to look at several different government
24 exhibits?

25 A. Yes, I did.

1 Q. In particular, government exhibits -- well, were those
2 exhibits seized from the search of that cell phone and that
3 computer?

4 A. Yes, they were.

5 MR. JACOBS: Your Honor, we'd offer a series of
6 exhibits from that cell phone and computer, BB30a through
7 BB30e, or excuse me, BB30a through BB30f, BB32a through
8 BB32d and BB41a through BB41e, BB50 through BB53.

9 THE COURT: 53 was the last one?

10 MR. JACOBS: Correct, Your Honor.

11 THE COURT: Okay. Any objection?

12 MR. UDOIBOK: May we approach, Your Honor.

13 THE COURT: Yes.

14 **(Sidebar discussion)**

15 THE COURT: Mr. Udoibok.

16 MR. UDOIBOK: Your Honor, I haven't been able --
17 can you hear me?

18 THE COURT: Yes.

19 MR. UDOIBOK: I haven't been able to see these
20 exhibits. If -- just for foundation, I don't have any
21 objection, but if their witness is going to testify about it
22 specifically, then I would object because there may be a
23 series of hearsay, and I haven't been able to look at any of
24 them, but I'm assuming.

25 THE COURT: Why haven't you been able to look at

1 any of them?

2 MR. UDOIBOK: Right now I haven't. Well this,
3 this, Your Honor, there's significant number of exhibits
4 that I haven't, I can't, impossible to have reviewed them
5 before today, I have looked at them earlier, but before now,
6 no.

7 THE COURT: Okay. Mr. Montez, any objection?

8 MR. MONTEZ: There's no objection from us.

9 THE COURT: Mr. Jacobs, when were these exhibits
10 disclosed as exhibits?

11 MR. JACOBS: Your Honor, the, these are text
12 message strings. The computer reports have been disclosed
13 for weeks or months. Some of the text message clips are
14 coming in in the last couple days.

15 I think we can alleviate this because I'm not
16 going to publish the text messages to the jury right now.
17 I'm simply offering them as a foundation from the witness
18 who found them.

19 **(In open court)**

20 THE COURT: BB30a through 30f, 32a through 32d,
21 41a through 41e and 50 through 53 are admitted.

22 BY MR. JACOBS:

23 Q. All right. Special Agent Blackmore, I want to walk
24 through a couple of the documentary items that you found in
25 the house. Okay?

1 A. Very well.

2 Q. Pulling up what's been admitted into evidence as BB2,
3 what is this document?

4 A. That appears to be a bank statement from Bank of
5 America.

6 Q. Okay. And what or who is the bank statement for?

7 A. An entity called School Age Consultant.

8 Q. And what's the address listed there for School Age
9 Consultant?

10 A. 202 North Cedar Avenue, Suite 1, Owatonna, Minnesota,
11 55060.

12 Q. And moving on to page 3 here, what is the name of the
13 individual associated with School Age Consultants LLC?

14 A. Aimee Marie Bock.

15 Q. Pulling up what has been admitted into evidence as
16 Government's BB3, Mr. Blackmore, can you tell the jury what
17 we see here?

18 A. These are copies of checks that were recovered during
19 the search warrant.

20 Q. Okay. Let's pull up one of these to focus on. Who is
21 this a check from?

22 A. It is from an entity called S & S Catering Incorporated.

23 Q. And who is it made out to?

24 A. School Age Consultants.

25 Q. The LLC that we just saw the banking information for?

1 A. That's correct.

2 Q. What's the date of this check?

3 A. January 10th, 2022.

4 Q. And how much is it for?

5 A. \$2,800.

6 Q. All right. Let's look at this top one here. Again, can
7 you just walk through who the check is from and who it's
8 made payable to?

9 A. I'll apologize if I can't pronounce the name correctly.
10 Abduljawad K. Omar, and it's made out to School Age
11 Consultants on January 5th of '22, in the amount of \$2,800.

12 Q. And if we look down in the bottom left-hand corner, what
13 is the for memo line?

14 A. It says, "Worthy purpose to," and I'm not sure what the
15 last word says.

16 Q. All right. One more check that we can make out down
17 here. Again, why don't you walk the jury through who the
18 check is from and who it's made payable to?

19 A. The check is from Mako Child Care, made out to School
20 Age Consultants on January 11th of 2022 in the amount of
21 \$5,600. And the notation is "worthy work/youth connect."

22 Q. Okay. Moving on to page 2, what's this?

23 A. It looks like a deposit slip from Bank of America.

24 Q. And what was the amount of the check deposited?

25 A. The amount of the check was \$65,000.

1 Q. And what's the available balance after that deposit?

2 A. \$2,761,452.70.

3 Q. Okay. You don't know what account that's for?

4 A. No, I do not.

5 Q. All right. Moving on to page 4, I'll rotate this so we
6 can all see it. Another check?

7 A. Yes.

8 Q. This one is from whom?

9 A. I-Care Home Health Care LLC.

10 Q. Made out to School Age Consultant?

11 A. Yes.

12 Q. What's the date of the check?

13 A. January 11th of 2021 in the amount of \$5,600.

14 Q. We saw a couple checks earlier that were \$2,800. This
15 one is \$5,600, twice as much?

16 A. Yes.

17 Q. What is written in the memo line?

18 A. It says, "FOF Taylor, Southside Youth."

19 Q. All right. Moving on to page 5, what is this?

20 A. They appear to be VIP tickets or passes I believe to
21 Graceland.

22 Q. What is Graceland?

23 A. It's the home, museum of Elvis Presley.

24 Q. Okay. And pulling up what's been admitted as
25 Government's BB9, can you tell the jury what BB9 is?

1 A. This is an earnings statement. It appears to be from
2 Handy Helpers LLC.

3 Q. And are you familiar with what Handy Helpers LLC is?

4 A. No, I'm not.

5 Q. And who is this earnings statement for?

6 A. Empress M. Watson.

7 Q. What is the address listed for Mr. Watson?

8 A. 13299 Bronze Parkway, Rosemount, Minnesota 55068.

9 Q. And this physical document was found in the house during
10 the search.

11 A. Yes, it was.

12 Q. Special Agent Blackmore, I just want to be clear. Were
13 you a case agent in this case?

14 A. No, I was not.

15 Q. You just participated in this investigation in what
16 capacity?

17 A. I assisted on the search warrant.

18 Q. And that's it?

19 A. That's it.

20 MR. JACOBS: Your Honor, no further questions for
21 Mr. Blackmore.

22 THE COURT: Thank you.

23 Mr. Udoibok, cross-examination.
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CROSS-EXAMINATION

BY MR. UDOIBOK:

Q. Officer, you were not a case agent. You just testified to that, correct?

A. That's correct. I was not the case agent.

Q. So you don't have any information as to what those documents were for, correct?

A. No. I just know that they were found on site.

MR. UDOIBOK: No further questions.

THE COURT: Mr. Montez or Mr. Colich?

MR. MONTEZ: No questions, Your Honor.

THE COURT: Thank you.

You may step down, sir. Thank you.

THE WITNESS: Thank you, Your Honor.

THE COURT: And the government may call its next witness.

MR. THOMPSON: Thank you, Your Honor. Your Honor, the government calls Hanna Marekegn.

THE COURT: Good morning. Would you stand before me to take the oath.

HANNA MAREKEGN,

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

THE WITNESS: Yes.

THE COURT: Thank you. You may be seated.

1 Q. Were you born and raised in Ethiopia?

2 A. Yes, sir.

3 Q. At some point did you leave Ethiopia?

4 A. Yes, sir.

5 Q. How old were you when you left Ethiopia?

6 A. I was 15 and a half.

7 Q. 15 and a half years old?

8 A. Yes, sir.

9 Q. Did you leave with your family?

10 A. Yes, sir.

11 Q. Where did you and your family go when you left Ethiopia
12 when you were 15 and a half years old?

13 A. Minneapolis.

14 Q. Minneapolis?

15 A. Yes.

16 Q. When you got to Minneapolis, did you go to school?

17 A. Yes, sir.

18 Q. Where did you attend school?

19 A. Roosevelt High School.

20 Q. Minneapolis Roosevelt High School?

21 A. Yes, sir.

22 Q. At the time you moved to the United States, did you
23 speak English?

24 A. No, I did not.

25 Q. What language did you grow up speaking?

1 A. I speak Amharic.

2 Q. I'm sorry. Pronounce that again?

3 A. Amharic.

4 Q. And that's the language in Ethiopia?

5 A. Yes, sir.

6 Q. Where did you learn English?

7 A. Minneapolis.

8 Q. In high school?

9 A. Yes, sir.

10 Q. Did you graduate?

11 A. Yes, sir. I have a GED.

12 Q. When did you get your GED?

13 A. After two years I came to the United States.

14 Q. Okay. At the time you would have graduated?

15 A. Yes, sir.

16 Q. Okay. After you got your GED and finished high school,
17 what did you do? Did you work?

18 A. Yes, sir.

19 Q. What kind of jobs did you have after you finished
20 school?

21 A. I was working for retail, JCPenney store.

22 Q. You worked at JCPenney?

23 A. Yes, sir.

24 Q. What did you do at JCPenney's?

25 A. I was a sales associate.

1 Q. A sales associate?

2 A. Yes, sir.

3 Q. Did you have other jobs in that time in your life when
4 you were young?

5 A. Not yet.

6 Q. At some point you started your own business; is that
7 right?

8 A. Yes, sir.

9 Q. When was that?

10 A. 2010.

11 Q. What business did you start in 2010?

12 A. I start food truck.

13 Q. Where was your -- where did you start your food truck?

14 A. Minneapolis.

15 Q. What kind of food truck did you have?

16 A. I started Ethiopian, vegan food.

17 Q. Vegan food?

18 A. Yes, sir.

19 Q. Can you give us a sense of what that means, what that
20 would be?

21 A. More vegetarian food.

22 Q. Okay. How long did you have your food truck?

23 A. Since 2010.

24 Q. Do you still run a food truck?

25 A. Yes, sir.

1 Q. Ms. Marekegn, at some point did you start another
2 business?

3 A. Yes, sir, I did.

4 Q. What was that business?

5 A. I used to run child daycare.

6 Q. A child daycare?

7 A. Yes, sir.

8 Q. How long did you run a child daycare?

9 A. Maybe a year and a half.

10 Q. How many kids attended your daycare?

11 A. Yes, sir.

12 Q. How many kids?

13 A. I was licensed for I believe 50.

14 Q. 50 kids. Did you have 50 kids attending?

15 A. No, sir.

16 Q. How many, roughly?

17 A. Maybe 20.

18 Q. 20?

19 A. Yeah.

20 Q. When did you have the daycare?

21 A. 2016, May, I had a license.

22 Q. And that you had for about a year and a half?

23 A. Yeah, I run it a year and a half.

24 Q. What did you do after your daycare?

25 A. I went back to food.

1 Q. You went back to food?

2 A. Yes, sir.

3 Q. Tell us what you did.

4 A. I was running a food truck business, and I only done it
5 summertime because wintertime we could not run the food
6 truck.

7 Q. What happened in the winter to your food truck?

8 A. We cannot operate because it's too cold.

9 Q. Okay. So did you start another business to supplement
10 your food truck?

11 A. Yes, sir.

12 Q. Is what was that business called?

13 A. I start, at COVID time I start a food program.

14 Q. Okay. But you had a physical location before COVID; is
15 that right?

16 A. Yes, sir.

17 Q. What was the business you had before COVID?

18 A. Brava Cafe.

19 Q. What is Brava Cafe?

20 A. It's 13 sitting. It's a cafe because it only has 13
21 seats.

22 Q. 13 seats?

23 A. Yes, sir.

24 Q. 13 chairs or 13 tables?

25 A. It's 13 chair.

1 Q. Okay. What kind of restaurant was Brava Cafe?

2 A. It was a small coffee shop.

3 Q. Where was it located?

4 A. 2021 East Hennepin.

5 Q. That's here in Minneapolis?

6 A. It's in Minneapolis.

7 Q. What, about a mile and a half from here, maybe two
8 miles?

9 A. Yes, sir.

10 Q. What kind of building was Brava Cafe located in?

11 A. At the point when I start, there was a YMCA corporate
12 office across the street from where I work. And, but it was
13 a very slow building.

14 Q. It was a slow building?

15 A. Yes, sir.

16 Q. Was Brava cafe in an office building?

17 A. Yes, it is an office building.

18 Q. How would you describe the office building that Brava
19 Cafe was located in?

20 A. It was an small business owner that they used to
21 operate.

22 Q. Was it full of people? Was it an active building?

23 A. No, it was not.

24 Q. How would you describe it?

25 A. It was occupied maybe 30 percent, the building.

1 Q. When you first started Brava Cafe, prior to COVID, did
2 you have employees, or was it just you?

3 A. It was just me.

4 Q. And how many customers would you get in a typical day?

5 A. It depends of the day. Maybe five, ten. It was a
6 struggling business.

7 Q. All day?

8 A. Yes, sir. Not all day. We operate until 2:00.

9 Q. Okay.

10 A. Yeah.

11 Q. Now, Ms. Marekegn, you said that at some point you
12 joined the food program with Brava Cafe; is that right?

13 A. Yes, sir.

14 Q. What do you mean by the "food program"?

15 A. It was COVID, so the building was empty, so I was not
16 even getting those five people or six people so --

17 Q. You didn't even get five or six customers a day?

18 A. No.

19 Q. Okay.

20 A. I was struggling, so I heard the program. My friend,
21 her name was Anab Awad, and she connected me with an
22 employee, with Eidleh, that he works for Feeding Our Future.

23 Q. Okay. I want to stop and walk you through that slowly
24 to make sure everyone catches it. Okay?

25 A. Okay.

1 Q. You said you heard, a friend of yours told you about the
2 food program.

3 A. Yes, sir.

4 Q. And that friends name was Anab Awad?

5 A. Yes, sir.

6 Q. Anab, is the first name?

7 A. Yes, sir.

8 Q. And the last name Awad, Awad?

9 A. Yes, sir.

10 Q. How did you know Anab Awad?

11 A. I know her because she used to have adult daycare and
12 different businesses.

13 Q. And what did she tell you about the food program?

14 A. It was a great program, that I would make money and I
15 can do it because I have the kitchen.

16 Q. What do you mean that you would make money? What did
17 Anab tell you?

18 A. It was really good program. You will make good money.
19 You don't have to struggle.

20 Q. And how are you going to make, according to Anab Awad,
21 how were you going to make good money in the food program?

22 A. At that time school was closed because of the COVID, so
23 kids not going to school, and you are giving kids food.

24 Q. Okay. And she said you can make money. What kind of
25 money?

1 A. Very good money.

2 Q. Okay. Were you interested?

3 A. Yes, sir.

4 Q. What did you tell her?

5 A. I say how do I start.

6 Q. And what happened next?

7 A. And she give me the information about Eidleh.

8 Q. Who is Eidleh?

9 A. He was an employee for Feeding Our Future.

10 Q. Okay. And when were these conversations?

11 A. This was on, before September.

12 Q. Of 2020?

13 A. Yes, sir.

14 Q. So in the first few months of COVID?

15 A. At the beginning of September.

16 Q. After Ms. Anab Awad gave you Eidleh's, put you in touch

17 with Eidleh, did you meet with him?

18 A. Yes, sir.

19 Q. Where did you meet with him?

20 A. I sent him my address. He came to the cafe.

21 Q. The Brava Cafe?

22 A. Yes, sir.

23 Q. Ms. Marekegn, before we talk about your meeting with

24 Mr. Eidleh, I want to talk to you a little bit about how you

25 came to testify here at this trial. Okay?

1 A. Okay.

2 Q. Were you charged for your role in the food program?

3 A. Yes, sir.

4 Q. With a crime?

5 A. Yes, sir.

6 Q. What were you charged with?

7 A. That I, I did fraud.

8 Q. You did a fraud? Did you plead guilty for your role in
9 the fraud scheme?

10 A. Yes, sir.

11 Q. When you pled guilty, did you agree to do something in
12 your guilty plea?

13 A. Can you repeat the question?

14 Q. When you pled guilty for your role in the food program
15 fraud scheme, did you agree to do something?

16 A. Yes, sir.

17 Q. What did you agree to do?

18 A. To tell the truth.

19 Q. Why did you agree to tell the truth?

20 A. Because I made a lot of mistake, and I have to tell the
21 truth.

22 Q. Do you hope to get a reduction in your sentence for
23 testifying truthfully in this case?

24 A. I don't -- I hope.

25 Q. You hope so?

1 A. Yes.

2 Q. What's your -- do you understand who will decide what
3 your sentence is ultimately?

4 A. Yes, sir.

5 Q. Who?

6 A. The judge.

7 Q. The judge?

8 A. (Moves head up and down.)

9 Q. Have you or I had any discussions about what your
10 sentence might be in this case?

11 A. No, sir.

12 Q. Have we talked about it at all?

13 A. No, sir.

14 Q. Okay. Ms. Marekegn, I want to go back to that first
15 meeting with Mr. Eidleh. When did you first meet with him?

16 A. Beginning of September.

17 Q. Of 2020?

18 A. Yes, sir.

19 Q. Where did you and Mr. Eidleh meet in early September of
20 2020?

21 A. At the 2021 East Hennepin, my coffee shop, Brava Cafe.

22 Q. What did you discuss with Mr. Eidleh when he came to
23 your Brava Cafe at that time?

24 A. He looked around the cafe. He looked the kitchen. He
25 says I am capable to do it.

1 Q. You are capable of doing what?

2 A. Cooking the food.

3 Q. Okay. What did, what else did he tell you during that
4 first meeting?

5 A. That is, you giving food for family. Basically, you
6 know, I -- you give food to children because they don't go
7 to school. They are at home, and he said he was going to
8 bring the contract and for me to start the work.

9 He took a picture of my EIN number, the business.
10 And it was a very quick meeting that we done the first time.

11 Q. He took a picture of your EIN number. That's a tax ID
12 form for your business?

13 A. Yes, sir.

14 Q. Brava Cafe?

15 A. Yes, sir.

16 Q. You said Mr. Eidleh told you the food program involved
17 serving meals to kids who were not in school; is that right?

18 A. Yeah. They are not attending school.

19 Q. Okay. Now were you running at Brava Cafe any sort of
20 after-school program or educational program, daycare,
21 anything like that?

22 A. No, sir.

23 Q. Did Mr. Eidleh talk to you about what kids would come to
24 your Brava Cafe?

25 A. No, sir.

1 Q. What kind of neighborhood is Brava Cafe located in? Is
2 it a residential neighborhood?

3 A. No, sir.

4 Q. What kind of neighborhood is it?

5 A. It's more industrial area.

6 Q. An industrial area?

7 A. Yes, sir.

8 Q. And Eidleh, Mr. Eidleh, did he tell you about where
9 these kids would come from or how you would find kids?

10 A. You supposed to go to churches, your community and
11 recruit your own kids.

12 Q. Recruit your own kids?

13 A. Yes, sir.

14 Q. Why would you do that?

15 A. That's the family, you have to give the food.

16 Q. Okay. How long did that first meeting last with
17 Mr. Eidleh at Brava Cafe?

18 A. The first meeting, it did not last long time.

19 Q. Okay. Did you meet with him again?

20 A. Yes, sir.

21 Q. When was that?

22 A. It was mid-September, the same month.

23 Q. Okay. Where did you meet the second time?

24 A. The same, my Brava Cafe.

25 Q. What did you discuss with Mr. Eidleh at that second

1 meeting?

2 A. That I have to -- he brought me the application. It was
3 not completed, filled out. So I signed where he wants me to
4 sign.

5 And he told me to serve up to 5,000 kids. And
6 I -- it's a lot of food, so I say I don't think I could do
7 5,000. So we talked about it a little bit, and I don't want
8 to fight back or, because I needed it, the money.

9 So we agreed to do 4,000, and he took the
10 application with him. He told me that I would start soon.

11 Q. Okay. I want to walk through that conversation piece by
12 piece.

13 You said he brought an application for you to fill
14 out?

15 A. Yes, sir.

16 Q. Did you fill -- who filled out that application?

17 A. At the time was not filled out, that application, but I
18 did sign the application.

19 Q. Did you and Mr. Eidleh fill it out at that meeting?

20 A. No, we did not.

21 Q. You just signed it?

22 A. I sign the application.

23 Q. Okay. You said he talked -- and we'll look at that
24 application in a second, but before we do, you said he
25 talked about serving 5,000 kids a day?

1 A. Yes, sir.

2 Q. Who came up with that number?

3 A. Eidleh.

4 Q. What was your reaction when he said you could serve
5 5,000 kids a day at Brava Cafe?

6 A. I mean, the, that is a lot of kids. I said I don't
7 think I could do 5,000 kids.

8 Q. Do you know 5,000 kids?

9 A. I don't know.

10 Q. Had you ever served 5,000 meals at Brava Cafe?

11 A. No, sir.

12 Q. How many people came into Brava Cafe on a typical day
13 prior to the COVID-19 pandemic?

14 A. It was not even five or ten people.

15 Q. Five or ten customers a day?

16 A. Yes, sir.

17 Q. When you told Mr. Eidleh you couldn't do 5,000 a day,
18 how did he respond?

19 A. He was not very happy, but I tried to compromise, and I
20 said, okay, I can do less, not 5,000. Then he said just to
21 do 4,000. And I said okay.

22 Q. Had you ever served 4,000 kids a day or people a day at
23 Brava Cafe?

24 A. No, sir.

25 Q. Were you capable of doing that?

1 A. No, sir.

2 Q. Did you have any employees?

3 A. I did not have employee yet.

4 Q. Did Mr. Eidleh at this next meeting talk to you about
5 money? I know you had said Anab Awad told you the program
6 involved good money, you would make good money. Did you and
7 Mr. Eidleh discuss that?

8 A. At the second meeting, we did not discuss yet the money.

9 Q. You did not discuss?

10 A. Not yet.

11 Q. Okay. Later you did?

12 A. Yes, we did.

13 Q. I want to show you what's been marked, but not yet
14 admitted, as Government Exhibit Q90.

15 I guess this is already in evidence Your Honor.
16 It's Government Exhibit Q90.

17 Ms. Marekegn, I'm going to, I'm showing you now
18 what's been admitted as Government Exhibit Q90, which is an
19 email from Aimee Bock to employees of MDE, sent on
20 September 16th of 2020. And it says Site Application for
21 the Brava Cafe.

22 That's your company, Brava Cafe?

23 A. Yes, sir.

24 Q. And September 16th, 2020, are you familiar with that
25 time frame?

1 A. Yes, sir.

2 Q. What happened around that time frame?

3 A. I was just still waiting for, to start work.

4 Q. Okay.

5 A. I did not start work.

6 Q. And I'm going to direct your attention here to page 4.

7 There's a site identification request for a site called

8 Brava Cafe.

9 A. Yes, sir.

10 Q. That's your company, your restaurant?

11 A. Yes, sir.

12 Q. And the site address 2021 East Hennepin Avenue,

13 Suite 190?

14 A. Yes, sir.

15 Q. Do you recognize that address?

16 A. Yes, sir.

17 Q. What is it?

18 A. That's Brava Cafe address.

19 Q. And on page 5 it lists the sponsoring organization as

20 Feeding Our Future. Are you familiar with Feeding Our

21 Future?

22 A. At that time, I don't know the name, what it called, at

23 the time that I was signing contract. I only know Eidleh.

24 Q. Okay. You learned later?

25 A. Yes.

1 Q. How about Ms. Bock? Did you know -- it says Aimee Bock
2 is listed as the contact person. Did you know Aimee Bock at
3 the time?

4 A. No, sir.

5 Q. Did you later meet her?

6 A. Yes, sir.

7 Q. And there's a contract here between Feeding Our Future
8 and Brava Cafe. I'm directing your attention to page 11 --

9 A. Yes.

10 Q. -- of Government Exhibit Q90. Is that your signature?

11 A. Yes, sir.

12 Q. Under Brava Cafe?

13 A. Yes, sir.

14 Q. As the owner?

15 A. Yes, sir.

16 Q. When did you sign this form?

17 A. I -- September, mid-September, 9/15/2020.

18 Q. When you met with Mr. Eidleh?

19 A. Yes, sir. The second time.

20 Q. And it says here on page 13 there's a preoperational
21 visit. And it says there was a site visit on September 15,
22 2020.

23 Does that appear to be when Mr. Eidleh came?

24 A. That's the time I sign the contract.

25 Q. Okay. How long was he at your business that second

1 meeting?

2 A. Not very long time.

3 Q. Do you have a sense of how long?

4 A. Maybe 30 minutes.

5 Q. And then you signed again here on the bottom of page 18.

6 And it says the plan start date was September 16th of 2020;
7 is that right?

8 A. That's what it said in here.

9 Q. You said that's what it says, but your face suggests
10 otherwise.

11 A. No, I did not start the 16.

12 Q. You did not start that 16th. Why not?

13 A. I did not start because I was not okay to start yet.

14 Q. What do you mean by that?

15 A. He didn't -- he told me that he would let me know when I
16 can start.

17 Q. Okay. And then on page 19, there's another form.

18 Minnesota Department of Education Summer Food Service
19 Program sponsor preoperational start date, and that's your
20 company there, Brava Cafe?

21 A. Yes, sir.

22 Q. And it says, "The planned meal service is breakfast and
23 lunch." Was that your understanding?

24 A. Yes, sir.

25 Q. And then it says, "The estimated number of meals to be

1 served at the site, 5,000 and the site capacity, 5,000."

2 Was that true?

3 A. I did not see this form until, you know -- no. This
4 form was not existed in the application.

5 Q. You didn't see this form before --

6 A. No.

7 Q. -- we showed it to you?

8 A. No, sir.

9 Q. Brava Cafe, did it have a capacity of 5,000 kids or
10 people?

11 A. No, sir.

12 Q. You said there was 13 seats?

13 A. I was licensed for 13 seats, yes.

14 Q. Did you plan on serving 5,000 meals a day at the site?

15 A. No, sir.

16 Q. And then on the bottom of page 20, that form is then,
17 there's a space that says, "Monitor's signature," and it
18 appears to be signed by Aimee Bock and dated September 15,
19 2020.

20 Did Ms. Bock come to Brava Cafe on September 15th,
21 2020?

22 A. No, sir.

23 Q. And then on page 23 there's another document that's
24 Required Elements and Civil Rights Training, and it lists
25 the trainer of Eidleh on September 15th, 2020.

1 Did you receive a civil rights training at that
2 day when Mr. Eidleh came to your business?

3 A. No, sir.

4 Q. Okay. Ms. Marekegn, after you submitted or signed that
5 application, what happened next?

6 A. He told me I can start working on September 24th.

7 Q. On September 24th?

8 A. Yes.

9 Q. Who told you you could start working on September 24th?

10 A. I started September 24th, but he said, you know, I could
11 have started before, but I was not doing anything.

12 Q. Who told you that?

13 A. Eidleh.

14 Q. How did he tell you that?

15 A. Because he said I can go ahead and start, and I start
16 working on the 24, but I did not start before
17 September 20th.

18 Q. On September 24th, what did you do?

19 A. I cook food.

20 Q. Okay. How much food?

21 A. Not very much because that was the first day.

22 Q. Okay. What did you do with the food?

23 A. We tried to give it away. We open the door.

24 Q. And did people come when you opened the door?

25 A. Not yet.

1 Q. After you joined the food program, how were you going to
2 get paid? What was your understanding?

3 A. I thought, my understanding was you submit the payment.
4 Eidleh is supposed to, told me how to make it, how to do it.
5 But when I first started, I never know how much food that we
6 were doing and stuff.

7 I honestly, like I did not, I did not do the meal
8 count or anything. It was just the end of the month, that's
9 when you get paid. That's what I was told.

10 Q. Okay. Who told you that?

11 A. Eidleh.

12 Q. So at the end of the month, what did you do?

13 A. September, I did not do anything.

14 Q. Okay. Moving forward, though, at the end of the month,
15 what would you typically do to get paid?

16 A. October, the end of October, I ask Eidleh when are we
17 going to get paid.

18 Q. And what did he tell you?

19 A. And Eidleh told me I have to submit to a claim and email
20 the meal count sheets. And I was not aware of that sheets
21 because I did not have the sheets.

22 Q. Okay. Did you eventually, did you at some point get the
23 sheets?

24 A. Yes, sir.

25 Q. How did you get the meal count sheets?

1 A. Eidleh brought it to me.

2 Q. Where did he bring it to?

3 A. To the cafe, Brava Cafe.

4 Q. Okay. And when he, when Mr. Eidleh brought meal count
5 sheets to you at Brava Cafe, what did you do with them
6 during that meeting?

7 A. I did not know what to do with it. He fill out for me
8 an example. And he told me he could just follow, copy this
9 and do it.

10 Q. So he filled out an example form?

11 A. Yes, sir.

12 Q. You said you had not been keeping track of how much food
13 you were giving out to how many kids prior to that?

14 A. Yes, sir. I mean I, he gave me a little circle, a
15 click, you have to click it.

16 Q. Okay.

17 A. You have to have it, but I never used them either.

18 Q. Why not?

19 A. There's only one click I was given and, and I don't
20 click every day or I was not trained very well, you know.
21 Just, I had the click and then they say that's how you fill
22 out the paperwork every day, but I didn't -- October meal
23 count sheet at the end of the month.

24 Q. Okay. Whether Eidleh told you how to fill out a meal
25 count sheet, what did he tell you to do?

1 A. Not to put the same number always.

2 Q. Okay. Well, let's look at one of those examples.

3 I'm going to show you Government Exhibit Q91
4 that's in evidence. And this is an email from an email
5 account missbenti@yahoo.com?

6 A. Yes, sir.

7 Q. Whose email account is that?

8 A. That's my email account.

9 Q. What name is listed on that email account?

10 A. That's my first name and my last name and my email
11 address.

12 Q. Okay. Now today you introduced yourself as Hanna
13 Marekegn.

14 A. Yes.

15 Q. That's not the name listed here. Could you explain
16 that?

17 A. I came to United States as Yemesarch Marekegn Benti.
18 And when I became citizen I change my name from Yemesarch to
19 Hanna. Hanna was my nickname before, because Yemesarch was
20 hard to pronounce.

21 Q. Okay. And Marekegn was your essentially your middle
22 name in Ethiopia?

23 A. Yeah. Yeah. No, that was my father name. My middle
24 name, my -- Benti is my grandfather name.

25 Q. Names in East Africa work differently; is that right?

1 A. Yes.

2 Q. Could you explain how names work in Ethiopia and
3 Somalia?

4 A. It is, you get call with your father name, and Benti is
5 my last name. And I took, I took it out, Benti, my
6 grandfather name. I use my father name.

7 Q. So your first name is your given name, right?

8 A. My first name was given to me by my grandmother.

9 Q. And your second name, when you lived in Ethiopia, what
10 was your -- Marekegn, where did that come from?

11 A. Marekegn is my father name.

12 Q. His first name?

13 A. Yes.

14 Q. His given name?

15 A. That's his first name.

16 Q. And Benti, your third name, or your last name in
17 American --

18 A. My grandfather name.

19 Q. And that's how names work in East Africa?

20 A. Yes.

21 Q. And so when you changed your name to Hanna Marekegn,
22 you -- Hanna was your nickname, and Marekegn was your
23 father's name?

24 A. Yes.

25 Q. Okay. Okay. And you sent this email to claims at

1 Feeding Our Future. What's that email account?

2 A. That was the email address we use to send to the claim.

3 Q. All right. Ms. Marekegn, I'm going to show you here.

4 These are meal counts starting at page 2 of Government
5 Exhibit Q91 for the week of January 1st, 2021; is that
6 right?

7 A. Yes, sir.

8 Q. And for the site Brava Cafe?

9 A. Yes, sir.

10 Q. That's your site?

11 A. Yes, sir.

12 Q. And I'll skip down to the first full week, which is on
13 page 4 of this exhibit. All right. Let's walk through what
14 you filled out here.

15 The available meals for each day is how many?

16 A. 4100.

17 Q. Where did that number come from?

18 A. That was I was told by Eidleh.

19 Q. What did Mr. Eidleh tell you?

20 A. You put the first ones what you're approved for, 4100.

21 Q. What you're approved for, what do you mean by that?

22 A. That's what we agreed, me and Eidleh.

23 Q. Essentially the maximum every day?

24 A. Yes, sir.

25 Q. Okay. And then down below here there's a line that

1 says, "Number of firsts served to children."

2 And what did you put there?

3 A. That's how much food you give.

4 Q. Okay. And who told you to do that?

5 A. Eidleh.

6 Q. Now, the numbers are just below about, within 100 below
7 of the 4100 figure every day?

8 A. Yes.

9 Q. Why did you do that?

10 A. If you write the same number every day that don't look
11 logistic.

12 Q. Who told you that?

13 A. Eidleh.

14 Q. Now, to be clear, were you actually, were you actually
15 serving meals to 4,000 kids a day in January 2021?

16 A. No, sir.

17 Q. Were you serving anywhere near that number of meals?

18 A. No, sir.

19 Q. Then why did you say that?

20 A. Greed.

21 Q. What do you mean by "greed"?

22 A. You don't think right, you know. I needed it, the
23 money, the money and just -- I was not thinking right. I
24 lied.

25 Q. You lied?

1 A. Yes.

2 Q. Every time? Ms. Marekegn, why did you lie in the meal
3 count forms?

4 A. I just, I write every month the sheets. I just copy it,
5 and I did not -- I was not myself.

6 Q. You are not suggesting that you didn't know this was
7 wrong, are you?

8 A. No.

9 Q. Okay. The initials at the bottom here are not your
10 initials; is that right?

11 A. Yes.

12 Q. Why -- is that one of your employees or whose initials
13 are that?

14 A. Eidleh told me as an owner I cannot sign this form.

15 Q. Why did Mr. Eidleh tell you not to sign the form
16 yourself or using your own name?

17 A. Because you supposed to count every day the food, and he
18 says you cannot sign it as Brava owner. Employee have to
19 sign it. And I use my husband initials.

20 Q. You used your husband's initials?

21 A. (Moves head up and down.)

22 Q. As I page through Government Exhibit Q91, every day for
23 the month of January 2021, you claimed to have prepared
24 4,100 breakfasts and 4,100 lunches; is that right?

25 A. Yes.

1 Q. And distributed right around 4,000 of those to children.

2 Did that actually happen? Did you actually do that?

3 A. No, sir.

4 Q. Could you have done that?

5 A. No, sir.

6 Q. Did children ever come to Brava Cafe?

7 A. No, sir.

8 Q. I'm going to show you now what's been admitted as
9 Government Exhibit Q92, which is another email that you sent
10 to claims at Feeding Our Future; is that right?

11 A. Yes, sir.

12 Q. And this email you sent on March 4th, 2021?

13 A. Yes.

14 Q. Is that right?

15 A. Yes, sir.

16 Q. And directing your attention to the second page, could
17 you describe the meal counts that you submitted for Brava
18 Cafe in the month of February 2021?

19 A. Yes, sir.

20 Q. Could you describe what they look like? What did you
21 claim?

22 A. 4100.

23 Q. Is that true?

24 A. No, sir.

25 Q. Why did you say it?

- 1 A. The greed, the money again.
- 2 Q. Eidleh knew you were doing this?
- 3 A. Yes, sir.
- 4 Q. What did he get out of it?
- 5 A. I was paying him for 15 percent.
- 6 Q. You were paying Eidleh?
- 7 A. Yes, sir.
- 8 Q. Can you tell us how the payments worked for the food
9 program?
- 10 A. When you receive the payment, he will know when you
11 receive it.
- 12 Q. Who would know?
- 13 A. Eidleh.
- 14 Q. What happened when you got paid?
- 15 A. He will ask you to pay him his 15 percent.
- 16 Q. What percent did you pay Eidleh?
- 17 A. 5 percent, I am sorry.
- 18 Q. You paid him 5 percent?
- 19 A. Yes, sir.
- 20 Q. How did you pay -- well, first off, why did you pay
21 Mr. Eidleh 5 percent?
- 22 A. He said he was the consultant for and I had to pay him.
- 23 Q. He said you had to pay him?
- 24 A. Yes, sir.
- 25 Q. What would happen if you didn't pay him 5 percent of the

1 amount you got?

2 A. You lose the contract.

3 Q. Would that have been a problem?

4 A. Yes, sir.

5 Q. Why?

6 A. Because you were -- I saw the payment. I was not
7 expecting that kind of payment first, and the payment was
8 really large.

9 Q. What kind of payments were you getting from the food
10 program?

11 A. The first time it was direct deposit, and I got it. It
12 was not a check, and it was really large amount of money.

13 Q. Roughly, how much was the first payment you received
14 from Feeding Our Future?

15 A. It was 200,000, 300,000 because I start the end of
16 September. And then October was really large amount,
17 600,000, I believe, or 700,000.

18 And then that's, you know, I just keep paying him
19 because he says, you know, you will do great and you will
20 live -- I wanted, you know, to live a better life.

21 Q. You wanted to get rich?

22 A. Yes, sir.

23 Q. Did you for a time?

24 A. Yes, sir.

25 Q. You continued to submit claims like this month after

1 month; is that right?

2 A. Yes, sir.

3 Q. I'm showing you now Government Exhibit Q93. And this is
4 an email you sent to claims at Feeding Our Future with your
5 March 2021 meal counts; is that right?

6 A. Yes, sir.

7 Q. I'm just paging through to the first full week here.
8 Page 4, now it's 4,200 meals prepared every day?

9 A. Yes, sir.

10 Q. Was that true?

11 A. No, it's not true.

12 Q. Did you actually do that?

13 A. No, sir.

14 Q. When you paid the kickbacks to Mr. Eidleh, how did you
15 do it?

16 A. I was paying him check and cashier's check.

17 Q. Cashier's check.

18 I'm going to show you now what's been admitted as
19 Government Exhibit W50 and directing your attention to
20 page 261 of this exhibit.

21 And this is a check from Brava Cafe Inc. Is that
22 your company?

23 A. Yes, sir.

24 Q. And it's dated January 2021, \$36,000 payment to Eidleh
25 Inc. And you signed it; is that right?

1 A. Yes, sir.

2 Q. What's Eidleh Inc.?

3 A. That's the, that's the company he give me to pay him.

4 Q. Okay. What is this \$36,000 for?

5 A. That's his 5 percent.

6 Q. Okay. The memo line says, "Supplies." Did you actually
7 purchase supplies from Eidleh Inc.?

8 A. No, sir.

9 Q. Why did you write that in the memo line of the check?

10 A. That's not my handwriting.

11 Q. You didn't write that in?

12 A. No, sir.

13 Q. I'm going to show you now Government Exhibit W57, which
14 is a bank account for a company called Hope Suppliers. And
15 specifically at page 19, there's another check for \$17,000
16 dated December 17th, 2020.

17 And this check is made out to Hope Suppliers, and
18 it's paid by you, Hanna Marekegn; is that right?

19 A. Yes, sir.

20 Q. What is this? What is this check for \$17,000 that you
21 wrote or obtained to Hope Suppliers?

22 A. That's also his, the payment for the --

23 Q. That's Mr. Eidleh's company?

24 A. Eidleh, yeah.

25 Q. Now, I'm directing your attention to Government

1 Exhibit W61, which is another bank account opened in the
2 name of Hope Suppliers LLC. And there's another cashier's
3 check that you wrote to Hope Suppliers LLC in February 2021.

4 Do you see your name in the upper-left-hand
5 corner?

6 A. Yes, sir.

7 Q. And this check is for \$39,461 to Hope Suppliers. What's
8 this check?

9 A. That's also his 5 percent.

10 Q. The memo line here says, "Supplies and logistics." Is
11 that true? Did you actually purchase supplies and logistics
12 from Hope Suppliers?

13 A. No, sir.

14 Q. If I page down to page 48, there's another check from
15 your company Brava Cafe to Hope Suppliers LLC for March,
16 March 18th of 2021 for \$33,000. What's this check?

17 A. That's also the payment for 5 percent.

18 Q. Okay. To Mr. Eidleh?

19 A. Yes, sir.

20 Q. Just happens, as we paged through the page before,
21 there's another check to Hope Suppliers from a company
22 called Salim Limited LLC. Are you familiar with that
23 company?

24 A. No, sir.

25 Q. Do you know whose company that belongs to?

1 A. No, sir.

2 Q. Do you know why Salim Limited LLC was writing a check
3 for \$14,000 to Mr. Eidleh's company Hope Suppliers LLC?

4 A. No, sir.

5 Q. Ms. Marekegn, I want to talk to you a little bit
6 about --

7 THE COURT: I would propose a break here.

8 MR. THOMPSON: That's fine, Your Honor. Good spot
9 for a break.

10 THE COURT: All right. And so let's return at
11 10:40.

12 So I will have you step down, and you will return
13 there at 10:40.

14 All rise for the jury.

15 10:23 a.m.

16 **IN OPEN COURT**

17 **(JURY NOT PRESENT)**

18 THE COURT: All right. 10:40, everyone. Thank
19 you.

20 (Recess taken at 10:24 a.m. till 10:42 a.m.)

21 10:42 a.m.

22 **IN OPEN COURT**

23 **(JURY PRESENT)**

24 THE COURT: You may all be seated.

25 Mr. Thompson, you may continue.

1 MR. THOMPSON: Thank you, Your Honor.

2 BY MR. THOMPSON:

3 Q. Welcome back, Ms. Marekegn.

4 A. Thank you.

5 Q. Can you pull that mic close again?

6 A. Okay.

7 Q. It's always hard to come back after a break. I get it.

8 Okay. When we left we were talking about the
9 kickbacks that you paid to Mr. Eidleh; is that right?

10 A. Yes, sir.

11 Q. And you made those via checks to various companies that
12 he, he had; is that right?

13 A. Yes, sir.

14 Q. Why did you pay those kickbacks to Mr. Eidleh?

15 A. Because he's the one enrolled me to the program.

16 Q. And were they optional payments?

17 A. No, sir.

18 Q. What would have happened had you not paid them?

19 A. You would lose the contract.

20 Q. No more money?

21 A. No more. Yes.

22 Q. Now, I want to talk about Aimee Bock. Okay?

23 A. Okay.

24 Q. Who is Aimee Bock?

25 A. She's the founder of Feeding Our Future.

1 Q. The founder of Feeding Our Future?

2 A. Yes, sir.

3 Q. When did you first meet Aimee Bock?

4 A. Right around spring of 2021.

5 Q. What happened in the spring of 2021 with respect to the
6 food program?

7 A. The food program was no -- they don't allow restaurant
8 to use it anymore.

9 Q. Okay. At some point did the food program stop for a
10 while?

11 A. Yes, sir.

12 Q. Who stopped the food program?

13 A. Department of Education.

14 Q. And do you know why the Department of Education stopped
15 the food program for a while or the payments?

16 A. Because we were told restaurant cannot be enrolled
17 anymore.

18 Q. Who told you that?

19 A. Feeding Our Future employee.

20 Q. Okay. Was there a dispute between Aimee Bock and the
21 Department of Education?

22 A. Yes, sir.

23 Q. What was that dispute about?

24 A. The program was disconnected and Feeding Our Future was
25 fighting with Department of Education.

1 Q. You say, "The program was disconnected." What do you
2 mean by that?

3 A. There was no more food program for COVID.

4 Q. And what did that mean when there was no more food
5 program in the spring of 2021? What was the effect of that?

6 A. If you were a nonprofit organization, you can still do
7 it, but I was not nonprofit organization.

8 Q. Okay. You talked about Aimee Bock having a fight with
9 the Department of Education.

10 A. Yes, sir.

11 Q. Can you tell us about that fight?

12 A. Department of Education, they were racist to the
13 community. They could not give us anymore the program as
14 the program existed. So that's the fight.

15 Q. Okay. And to be clear, are you calling the Department
16 of Education racist?

17 A. No, sir.

18 Q. Who called the Department of Education racist?

19 A. Aimee Bock.

20 Q. What did Aimee Bock say?

21 A. She said they don't want to give us the program, the
22 program still exists and they just, they want us to do the
23 work, was not meant to be for our community.

24 Q. What do you mean "your community"?

25 A. Was all East African community was involved into this

1 program at that time.

2 Q. Okay. And what did Aimee Bock say about that in her
3 dispute with the Department of Education?

4 A. That they don't want colored people to do it.

5 Q. She accused the Department of Education of that?

6 A. Yes, sir.

7 Q. Was that true?

8 A. No, sir.

9 Q. What was the truth?

10 A. From the beginning until -- was a fraud. We were doing
11 wrong.

12 Q. Who was doing wrong?

13 A. All of us.

14 Q. What were you all -- and whether you say, "All of us,"
15 do you mean all of the sites under Feeding Our Future?

16 A. Yes.

17 MR. UDOIBOK: Objection. Leading.

18 THE COURT: Overruled.

19 You may answer.

20 THE WITNESS: Yes, sir.

21 BY MR. THOMPSON:

22 Q. What were the sites under the sponsorship of Feeding Our
23 Future doing? How were they doing wrong?

24 A. There was no right guideline. We were doing it wrong,
25 and we were not doing the food, what we said we were giving.

1 And that was wrong.

2 Q. Lying.

3 A. Yes, sir.

4 Q. To get what?

5 A. To live, to make more money.

6 Q. How much money did people make?

7 A. Lots of money.

8 Q. This fight -- well, first off, did Aimee Bock know that
9 the people in the program were making a lot of money?

10 MR. UDOIBOK: Objection. Leading.

11 THE COURT: Overruled.

12 MR. UDOIBOK: Your Honor, calls for speculation.

13 THE COURT: You may answer if you can.

14 The objection is overruled.

15 THE WITNESS: Yes, we were. It was wrong.

16 BY MR. THOMPSON:

17 Q. Okay. Can you tell me about that fight that Ms. Bock
18 had with the Department of Education? Did you have any
19 involvement in that?

20 A. Yes, sir.

21 Q. Could you talk about that? What was your involvement?

22 A. We was told East African community, we have senates and
23 council member through the community. We were supposed to
24 make calls Department of Education, and we're supposed to
25 advocate, you know, make calls all the time, so they can

1 open for us, the program.

2 Q. Who asked you and others in the East African community
3 to call city council members, senators, politicians?

4 A. It was Aimee Bock.

5 Q. What did she ask you to say to those politicians?

6 A. That our, the children needs the food. This program, we
7 need it.

8 Q. Was that true?

9 A. No, it was not true.

10 Q. What was actually happening with the program?

11 A. More fraud.

12 Q. You said Aimee Bock asked you and others in the East
13 African community to call the Department of Education.

14 A. Yes, sir.

15 Q. What did she want you to call them about or say?

16 A. Telling them we do need it. The childrens need the
17 food. We need the program.

18 Q. Who needed the program?

19 A. Us.

20 Q. When you say, "Us," what do you mean?

21 A. Us, the people, we were doing wrong.

22 Q. But are you talking about a certain group of people?

23 A. All of us, the vendor, the founder, we all were doing
24 wrong.

25 Q. Did Aimee Bock ask you and others, when you called

1 politicians or the Department of Education, to claim that
2 they were discriminating against the East African community?

3 A. Yes.

4 Q. Did you and others do that?

5 A. Yes, we did.

6 Q. Was that true?

7 A. It was not true.

8 Q. Why did you and others do it? Why did you say that if
9 it wasn't true?

10 A. We were, we were fooled to -- I mean, it was stupid. We
11 knew everything was wrong, but we just keep doing it because
12 you never, you know, you were leaving -- we needed the
13 money. We work. We come to this country to have a better
14 life, and this was way different.

15 Q. How was it way different?

16 A. Something we never seen, and it's, you know, sometimes
17 COVID fraud is not a fraud.

18 Q. COVID fraud is not a fraud?

19 A. Yes.

20 Q. You said you heard that?

21 A. Yes, sir.

22 Q. Where did you hear that?

23 A. From Feeding Our Future office. Everybody, we all were
24 told COVID fraud is not a fraud.

25 Q. COVID fraud is not a fraud?

1 A. Yes, sir.

2 Q. Did that mean you didn't think it was fraud? You didn't
3 think it was wrong?

4 A. I might -- you have the fear. I knew I was doing wrong,
5 but I was not thinking right, you know.

6 Q. Okay. At some point Ms. Bock won her dispute with the
7 Department of Education, at least for a time; is that right?

8 A. Yes, sir.

9 Q. I want to talk about that later, but before I do, after
10 that in the spring of 2021, did you have some conversations
11 with, sorry, with Aimee Bock?

12 A. Yeah, we went to the Feeding Our Future office.

13 Q. When did you go to the Feeding Our Future office?

14 A. When the dispute was going on with the state.

15 Q. Why did you go to Feeding Our Future's office?

16 A. To support more the fraud.

17 Q. What did you do at Feeding Our Future's office when you
18 went in the spring of 2021?

19 A. We had, the state senate was there. We called Keith
20 Ellison office. We told them like we get shut down for no
21 reason, and it was race issue.

22 Q. You said a state senator was there?

23 A. Yes, sir.

24 Q. And you said someone made a call to Keith Ellison?

25 A. Yes, sir.

1 Q. Who is Keith Ellison?

2 A. He is the United States -- Minnesota.

3 Q. The attorney general?

4 A. Attorney general.

5 Q. Okay. Who called Keith Ellison while you were at
6 Feeding Our Future?

7 A. It was the state senate.

8 Q. Okay. Did you have an individual meeting with Aimee
9 Bock in the spring of 2021?

10 A. Yes, sir.

11 Q. Could you describe that meeting?

12 A. It was first meeting I have done, seven days meal pack,
13 and she was not aware of it that I was doing seven days a
14 week.

15 Q. Are you talking about a meeting in August of 2021?

16 A. Yes, sir.

17 Q. I'm talking about in the spring of 2021, after the food
18 program restarted.

19 A. Oh, I had told Aimee Bock that I was paying Eidleh, if
20 that was okay.

21 Q. Okay. Well, let's talk about this meeting. Why were
22 you meeting with Aimee Bock in the spring of 2021?

23 A. I went there to pick up a check.

24 Q. You went to Feeding Our Future to pick up a check?

25 A. Yes, sir.

1 Q. Is that something you would do regularly?

2 A. Yes, sir.

3 Q. How often would you go to Feeding Our Future to pick up
4 a check?

5 A. Once a month.

6 Q. Okay. What would you see when you picked up a check?

7 A. It was all, there was a lot of people in office all the
8 time.

9 Q. What were they doing?

10 A. Some people picking up a check, some people getting a
11 new site, you know. I was --

12 Q. Okay. In the spring of 2021, you went to her office to
13 talk about a change in the program; is that right?

14 A. Yes, sir.

15 Q. What was that change?

16 A. I couldn't get food from my location.

17 Q. Why was your -- why could your location not do food?

18 A. Because I was a restaurant owner.

19 Q. A for-profit?

20 A. Yes, sir.

21 Q. Okay. So the rules had changed. Were you able to still
22 participate in the program as Brava Cafe?

23 A. Yes, sir.

24 Q. But you had to participate in a different way; is that
25 right?

1 A. Yes, sir.

2 Q. How so?

3 A. I supposed to cook the food and deliver the food to the
4 nonprofits location.

5 Q. As a vendor?

6 A. Yes, sir.

7 Q. Okay. During this conversation with Ms. Bock, did you
8 talk about your relationship with Mr. Eidleh?

9 A. Yes, sir.

10 Q. And what did you and Ms. Bock discuss?

11 A. That if that was okay to pay a percentage for Eidleh.

12 Q. You asked Ms. Bock that?

13 A. Yes, sir.

14 Q. What specifically did you ask her?

15 A. That I give him 5 percent from the money that I receive.

16 Q. Why did you talk to Ms. Bock about that?

17 A. I don't want to pay him.

18 Q. You didn't want to pay Mr. Eidleh?

19 A. Yes, sir.

20 Q. Why not?

21 A. I heard he doesn't work there anymore, so I just wanted
22 to know if he still there or not.

23 Q. What did Ms. Bock, how did Ms. Bock respond when you
24 asked whether you needed to continue to pay Mr. Eidleh 5
25 percent of the funds you received?

1 A. She says just keep doing what you and Eidleh agreed.
2 She didn't want to know the detail of it.

3 Q. What do you mean? What did she say about not wanting to
4 know the details?

5 A. She don't want to know the whole, you know, I couldn't
6 explain to her any more. She said just do what you are --
7 talk to Eidleh.

8 Q. Keep doing what you are doing?

9 A. Yeah.

10 Q. So did you?

11 A. Yes, I did.

12 Q. During that meeting, did you and Ms. Bock also
13 participate or discuss how Brava Cafe could participate in
14 the program as a vendor?

15 A. At that time I was still working, but when I got
16 disconnected from Department of Education, when they told me
17 I cannot do it as a restaurant, that's when I asked Aimee if
18 I can become a vendor for.

19 Q. Can you tell us the difference between having a site at
20 Brava Cafe and being a vendor? What did Ms. Bock tell you?

21 A. That she give it to me to serve 2,000 cooked food,
22 breakfast and lunch, to Shamsia Hope in Brooklyn Center.

23 Q. And what's Shamsia Hopes?

24 A. It's a nonprofit organization.

25 Q. And what did Ms. Bock tell you to do with respect to

1 Shamsia Hopes?

2 A. That I can take the food to Shamsia Hopes, but Shamsia
3 Hopes, she cannot -- they cannot distribute the food.

4 Q. Ms. Bock told you that or you knew that?

5 A. I was told by Ms. Bock.

6 Q. Okay. Did you also serve as a vendor for another site?

7 A. Yes, sir.

8 Q. What was that site called?

9 A. House of Refuge.

10 Q. And who ran House of Refuge?

11 A. House of Refuge is another nonprofit organization.

12 Q. So the nonprofits could keep participating at this
13 point?

14 A. Yes, sir.

15 Q. When did you start as a vendor for Shamsia Hopes and
16 House of Refuge?

17 A. I started first for Shamsia Hope in June 2021 in the
18 summer food program.

19 Q. In the summer food program?

20 A. Yes, sir.

21 Q. And how much, when you first started with Shamsia Hopes,
22 how much did you claim? How many meals did you claim to be
23 delivering to that site every day?

24 A. 2,000.

25 Q. Were you actually doing that?

1 A. No, sir.

2 Q. Why not?

3 A. We were supposed to distribute the food, not Shamsia
4 Hopes.

5 Q. Okay. But did you actually distribute food?

6 A. No, sir.

7 Q. Why did you continue to claim that you were?

8 A. The money makes you really blind.

9 Q. As a vendor, your fraud got significantly larger; is
10 that right?

11 A. Yes.

12 Q. Can you tell us how your fraud got larger as a vendor in
13 the summer of 2021?

14 A. At the time 2021, when I was doing for Shamsia Hopes,
15 was Feeding Our Future won with the Department of Education,
16 and we knew Aimee Bock was, she will not lose any fight.
17 She --

18 We were told she's stated that there was no one
19 won Department of Education. She was the only one won.

20 Q. Okay. So as a vendor what did you do? How did your
21 fraud get bigger? What did you do?

22 A. At the moment you feel, you know, even the lie become
23 true.

24 Q. What do you mean "the lie became true"?

25 A. You feel like you are doing right, not even a fraud.

1 You know, you become --

2 Q. Emboldened?

3 A. Yeah.

4 Q. You thought you could get away with it?

5 A. Yes.

6 Q. Why did you think you could get away with it?

7 A. Because she was very proud of it that she won Department
8 of Education.

9 Q. Aimee Bock was proud of it?

10 A. Yes, sir.

11 Q. Why do you say that?

12 A. I was there when the, in her office, we used to attend
13 the court. It was a zoom court that time. Nobody can not
14 go to the courtroom. So they used to open a TV, and we used
15 to watch what the court was.

16 And, you know, Department of Education is, it's a
17 big thing, and for her to win it, you say, you know,
18 everybody -- when she won, Aimee Bock, everybody thought
19 nobody can not touch Aimee.

20 Q. Okay. So let's talk about your vendor. I'm going to
21 show you what's been admitted as Government Exhibit Q98.

22 Actually, I'm going to first show you Government
23 Exhibit Q96, which is an email that you sent to Feeding Our
24 Future on May 21st, 2021. Okay. Do you see that?

25 A. Yes, sir.

1 Q. It says, "Brava Cafe April invoice"?

2 A. Yes, sir.

3 Q. And directing your attention to page 2, there's an
4 invoice from your company, Brava Cafe; is that right?

5 A. Yes, sir.

6 Q. Invoice Number 8?

7 A. Yes, sir.

8 Q. And it's billed to Feeding Our Future, correct?

9 A. Yes, sir.

10 Q. And for each day, it lists about 4,100 breakfasts and
11 4,000ish lunches; is that right?

12 A. Yes, sir.

13 Q. For every day of April 2021, correct?

14 A. Yes, sir.

15 Q. And the total amount of the -- well first off, let me
16 ask you: Did you actually serve more than 4,000 breakfasts
17 and lunches to kids every day in April 2021?

18 A. No, sir.

19 Q. This is a fraudulent invoice?

20 A. Yes, sir.

21 Q. The total amount of that invoice that you are claiming
22 is \$808,821 for the month of April 2021 alone; is that
23 correct?

24 A. Yes, sir.

25 Q. Should you have received that money?

1 A. I never should have received, but I did receive.

2 Q. Who did you receive it from?

3 A. Feeding Our Future.

4 Q. I want to show you a different one, Q98, which is
5 another email that you sent to Feeding Our Future on
6 August 3rd of 2021; is that right?

7 A. Yes, sir.

8 Q. And it says, "House of Refuge, July invoice." Can you
9 remind us again what House of Refuge is?

10 A. It's a nonprofit food, food shelf place.

11 Q. Okay. And what was, at least on paper, the relationship
12 between your company, Brava Cafe, and House of Refuge?

13 A. Again, my, my friend Anab brought me a different person,
14 Omar Jamal, and then I was working with them. And House of
15 Refuge has a lot of churches, a lot of sites to give food.
16 And I was, I could be able to do it.

17 Q. Who introduced you to House of Refuge?

18 A. It was Anab Awad.

19 Q. Okay. And so what were you supposed to be doing with
20 respect to House of Refuge?

21 A. She's a nonprofit organization. She does food shelters.
22 She gives food to low income people, and Omar Jamal known
23 her, and she has good potential doing this program for a
24 long time.

25 Q. And so House of Refuge joined the food program?

1 A. Yes, sir.

2 Q. Was that a good idea?

3 A. No, sir.

4 Q. Was Sharon Ross ultimately charged in this case?

5 A. Yes, sir.

6 Q. I'm going to direct your attention to the second page of
7 Government Exhibit Q98. And this is an invoice from Brava
8 Cafe to House of Refuge; is that right?

9 A. Yes, sir.

10 Q. Dated August 3rd, 2021?

11 A. Yes, sir.

12 Q. It's Invoice Number 1?

13 A. Yes, sir.

14 Q. And the total amount of the invoice is over
15 \$3.1 million; is that right?

16 A. Yes, sir.

17 Q. And that's for the month of July 2021, just for that
18 single month, correct?

19 A. Yes, sir.

20 Q. When we look here, for each day of July 2021, it says
21 breakfast and lunch 2,890, and the price is \$38.50, so over
22 a hundred thousand dollars a day in Federal Child Nutrition
23 Program funds.

24 Can you explain why the numbers are so high on
25 this invoice, what were you claiming to be doing?

1 A. That food, that this is the, a dry food program.

2 Q. Okay. What's the dry food program?

3 A. You supposed to give each day different kids, 3,000
4 children, seven days food, meal pack. Seven days breakfast,
5 seven days lunch.

6 Q. All in one?

7 A. And all in one bag.

8 Q. One bag?

9 A. Yeah.

10 Q. And so each day you claimed to be providing 2,890, just
11 under 3,000 seven-day meal packs?

12 A. Yes, sir.

13 Q. Two meals?

14 A. Yes, sir.

15 Q. So how many meals is that a week?

16 A. That's 21,000 meals.

17 Q. That's actually 21,000 meals a day?

18 A. Yes.

19 Q. Or maybe 42,000 meals a day? I don't know. Breakfast
20 and lunch?

21 A. Yes, breakfast and lunch.

22 Q. Were you actually doing that?

23 A. Yes. We have to.

24 Q. Did you do it?

25 A. No, sir.

1 Q. Why did you claim you were?

2 A. I, I was, I was bad. I --

3 Q. You said you were bad?

4 A. Yeah.

5 Q. How were you bad? What does that mean?

6 A. I don't know. This is more than, more than greed, you
7 know. This is wrong.

8 Q. This invoice that you submitted caught Aimee Bock's eye;
9 is that right?

10 A. Yes, sir.

11 Q. What happened after you submitted this \$3 million
12 invoice to Feeding -- well, the House of Refuge, but it made
13 it's way to Feeding Our Future here, correct?

14 A. Yes, sir.

15 Q. You emailed it to Feeding Our Future on August 3rd,
16 2021, correct?

17 A. Yes, sir.

18 Q. What happened after you did that?

19 A. Me and Aimee Bock, we start fighting.

20 Q. You and Ms. Bock started fighting?

21 A. Yes, sir.

22 Q. What did you and Aimee Bock start fighting about?

23 A. That the first meeting I had she says you are, you are
24 claiming wrong. You are not doing the work, she said.

25 Q. About this invoice?

1 A. Yes, sir.

2 Q. What did she tell you?

3 A. She said you cannot do all this food. You are not
4 capable.

5 Q. Was she right?

6 A. Yes, she's right.

7 Q. How did you tell her she was wrong, this is wrong?

8 A. I told her she was wrong.

9 Q. Why did you tell her she was wrong?

10 A. Because she has an employee that comes in and inspect.
11 They inspect that day. They supposed to count how many pack
12 we had.

13 Q. A Feeding Our Future employee?

14 A. Yes, sir.

15 Q. Was supposed to be monitoring your site?

16 A. Yes, sir.

17 Q. And when the Feeding Our Future employee would come --
18 well, did they come to your site sometimes?

19 A. They never came Brava Cafe, but they did come to House
20 of Refuge.

21 Q. The day that a Feeding Our Future employee came to House
22 of Refuge, did you distribute 21,000 meals or 42,000 meals?

23 A. No, sir.

24 Q. Okay. So when you pushed back against Ms. Bock, what
25 happened during that conversation? What happened next?

1 A. And the second that I told her that her employee came,
2 there were three of them came the first time that we were
3 giving food. They were there until the food shelf was done,
4 and they passed that inspection, so she was responsible to
5 pay that bill.

6 Q. Even though you knew it wasn't true?

7 A. Yes, sir.

8 Q. How did Ms. Bock react to that? Why were you telling
9 her that? Her employees were there. They signed off on
10 this. Why did you say that?

11 A. Because I was working with this, this contract is --
12 Anab Awad also involved in it. She was partner with me to
13 this program.

14 Q. Okay.

15 A. And she said she pays everyone like that. She just, she
16 wants something, you know.

17 Q. Okay. Let me just get this clear. Anab Awad told you
18 something?

19 A. Yes.

20 Q. She was your partner?

21 A. Yes, sir.

22 Q. What did Anab Awad tell you about this dispute?

23 A. She said, you know, you can fight it, you will get paid.

24 Q. And what did, specifically what did Anab Awad tell you
25 about Ms. Bock?

1 A. She says I will get paid. She just want some money out
2 of there, so you can fight it, you will get paid.

3 Q. What do you mean she might, she must want some money out
4 of this? Who must want some money out of it?

5 A. Aimee Bock.

6 Q. Did you later meet with Aimee Bock about this invoice?

7 A. Yes, I did.

8 Q. Where did you meet?

9 A. For the second time we met, me, Aimee Bock and House of
10 Refuge, Sharon Ross.

11 Q. Where did you, Ms. Bock and Sharon Ross meet?

12 A. At her office.

13 Q. Whose office?

14 A. Aimee's office.

15 Q. What did you discuss at this second meeting?

16 A. We discuss about more milk than the food.

17 Q. What do you mean, "More milk than the food"?

18 A. The program is more milk counts than the food. So Aimee
19 told me I did not have all that milk receipts. And so that
20 was the fight. She was trying to explain to me the numbers
21 and stuff like that.

22 Q. Did you actually have as much milk as you had claimed?

23 A. It's, it's impossible to do all that -- that's a lot of
24 milk.

25 Q. Okay. All right. So how did you respond when Ms. Bock

1 said there's no way you did that much milk and you didn't
2 have enough receipts?

3 A. The meeting, it did not go very well.

4 Q. What do you mean when you say, "The meeting did not go
5 very well"?

6 A. We didn't finish our conversation that day, so she
7 wanted the milk receipt and everything, and then we, I said
8 I'm willing to submit and I left.

9 Q. Did you meet with Ms. Bock again about this invoice?

10 A. Yes, sir.

11 Q. Who was present for that meeting?

12 A. By myself.

13 Q. Where did you and Ms. Bock meet?

14 A. Aimee Bock told me to meet her out of sight of her
15 office.

16 Q. Outside of her office?

17 A. Yes, sir.

18 Q. Where did Ms. Bock want to meet you?

19 A. I was told to meet her at the northeast, a coffee shop.

20 Q. A coffee shop in northeast Minneapolis?

21 A. Yes, sir.

22 Q. And did you do that?

23 A. Yes, sir.

24 Q. What happened when you arrived at the coffee shop?

25 A. She will submit the invoice.

1 Q. Okay.

2 A. And she can pay me if I can pay back half the money.

3 Q. Okay. When you arrived at the coffee shop, what
4 happened?

5 A. Aimee Bock told me to leave my phone and my watch in my
6 car.

7 Q. Aimee Bock told you to leave your phone and your watch
8 in your car?

9 A. Yes, sir.

10 Q. What kind of watch do you have?

11 A. I have an Apple watch.

12 Q. Why did Ms. Bock want you to leave your phone and your
13 Apple watch in the car?

14 A. It's normal in the community get recorded, so she's told
15 me like leave your phone and your watch.

16 Q. She was concerned you would record the conversation?

17 A. Yes, sir.

18 Q. So did you do that?

19 A. Yes, sir.

20 Q. Did you leave your phone and your Apple watch in the
21 car?

22 A. Yes, sir.

23 Q. Then you went in the coffee shop?

24 A. Yes, sir.

25 Q. When you sat down with Ms. Bock in the coffee shop, can

1 you tell me about how that conversation transpired?

2 A. Not very good. I was there for less than 20 minute.

3 Q. Okay. How did it begin?

4 A. It was a very quiet conversation.

5 Q. A very quiet conversation?

6 A. Yes, sir.

7 Q. What do you mean by that?

8 A. She was very straightforward, and she says, you know, it
9 was my choice to do the work or not. She didn't -- she
10 wanted half of the money on the invoice.

11 Q. I'm sorry. Aimee Bock told you she wanted what?

12 A. It was not an option for me to do the food or not to do
13 the food, but she wanted half the money of that.

14 Q. Half of what money?

15 A. The invoice.

16 Q. Okay. This is the invoice we're looking at here,
17 Government Exhibit Q98, correct?

18 A. Yes, sir.

19 Q. So this is the \$3 million invoice that caused this big
20 dispute?

21 A. Yes, sir.

22 Q. What did Ms. Bock want with respect to this invoice? I
23 want to make sure I'm clear.

24 A. It was a million. She wanted it to get paid cash.

25 Q. She wanted to get paid cash?

1 A. Yeah.

2 Q. A percentage of this invoice?

3 A. 50 percent.

4 Q. She wanted 50 percent.

5 A. Yeah.

6 Q. When she asked you that, how did you respond?

7 A. I was pretty shocked because that's a lot of money for
8 me to get in cash with that kind of money.

9 Q. Did you want to pay her?

10 A. That's a lot of money. I know I cannot get that kind of
11 money in cash.

12 Q. Well, you had \$3 million.

13 A. Yeah, but not cash.

14 Q. Okay. Did you pay her?

15 A. No, I did not give her.

16 Q. How did you respond?

17 A. I said I cannot come up with a million and a half cash.

18 Q. What happened then?

19 A. I walked out from the coffee shop.

20 Q. Okay. What happened to your relationship with Ms. Bock
21 and Feeding Our Future after you refused?

22 A. I got terminated from the contract.

23 Q. Who terminated you from the food program contract?

24 A. It was Aimee Bock.

25 Q. Okay. What did you do then?

1 A. I fight it.

2 Q. You fought it?

3 A. Yes, sir.

4 Q. What did you do? How did you fight it?

5 A. I hire a lawyer, and I send it to Department of

6 Education. She has her lawyer was sending --

7 Q. Well, what did you send to the Department of Education?

8 A. I first file a complaint.

9 Q. Okay. What did you, what was the complaint that you
10 filed with the Department of Education against Ms. Bock and
11 Feeding Our Future?

12 A. She asked me to pay her a kickback, and I refused to pay
13 her.

14 Q. At that point, were you paying kickbacks to Eidleh?

15 A. No, I was not paying -- Eidleh was not there after that
16 moment.

17 Q. You had stopped paying him?

18 A. Yes, sir.

19 Q. Did he -- was he okay with you when you had stopped
20 paying him?

21 A. No, sir.

22 Q. Can you explain what conversations, if any, you had with
23 Mr. Eidleh?

24 A. I ignore talking to him. I was not responding his call
25 or his text message.

1 Q. When did that start?

2 A. That was April.

3 Q. Okay.

4 A. That's the last check I took.

5 Q. Ms. Marekegn, after, while this dispute was going on
6 with Ms. Bock, she terminated you in the program. You filed
7 a complaint --

8 A. Yes, sir.

9 Q. -- with MDE against her. You went on to continue to be
10 involved in the program under another sponsor; is that
11 right?

12 A. Yes, sir.

13 Q. Did you submit fraudulent claims through that sponsor as
14 well?

15 A. Yes, sir.

16 Q. Ms. Marekegn, before we finish here, I want to talk to
17 you about the spring of 2021 and go back to that dispute
18 with the Department of Education.

19 You had said earlier that Ms. Bock -- well, how
20 did that dispute resolve in the spring of 2021?

21 A. Aimee won the Department of Education, the fight.

22 Q. When you say she won the fight with the Department of
23 Education, what do you mean? What happened?

24 A. The fraud, you know, it was all a fraud, and she won
25 Department of Education.

1 Q. So after she won, what happened?

2 A. The whole community look at her, Aimee Bock was a god.

3 Q. Aimee Bock was a god?

4 A. Yes.

5 Q. Who viewed Aimee Bock as a god after she beat the
6 Department of Education?

7 A. All of us.

8 Q. All of us meaning who? Who is "us"?

9 A. All the community. There was a party was done for her.
10 We went. I did go to the party. And, you know, nobody
11 cannot -- she was very proud of it, talking, telling us that
12 no one cannot win Department of Education, she won, and they
13 were wrong, she was right.

14 And everybody, she has a nickname was Aimee Sweet.

15 Q. Sweet Aimee?

16 A. Yes, sir.

17 Q. That was her nickname?

18 A. Yes, sir.

19 Q. Who called Ms. Bock Sweet Aimee?

20 A. The whole East African community.

21 Q. Why did the East African community call Ms. Bock Sweet
22 Aimee?

23 A. Because she give us the real American dream life.

24 Q. What do you mean by she gave you the American dream
25 life?

1 A. I will never -- we, we were able to own houses, good
2 cars. I mean, we were living very large.

3 Q. Living very large?

4 A. Yes, sir.

5 Q. When you would go to Feeding Our Future each month to
6 pick up a check, what would you see in terms of cars and
7 things like that?

8 A. We were, all of us, driving fancy cars and stuff like
9 that.

10 Q. You talked about the celebration that you went to. When
11 was that?

12 A. That was right after she won Department of Education.

13 Q. Who hosted the celebration?

14 A. There were very certain people that is very friend with
15 Aimee.

16 Q. Good friends with Aimee?

17 A. Yes, sir.

18 Q. Do you know them?

19 A. I know them through, through the community, yes.

20 Q. Who were they?

21 A. S & S Catering. I always, when I pick up a check, I see
22 her there Sahra Nur.

23 Q. Sahra Nur?

24 A. Yeah. And Ikram. I don't know here last name. She was
25 always there. I don't know if she was an employee or --

1 Q. You said you saw the owner of S & S Catering Sahra when
2 you would go to Feeding Our Future?

3 A. Yes, sir.

4 Q. Could you describe that?

5 A. You don't know who works there, who doesn't work there,
6 because you will see a lot of women there. You will see
7 the -- some of the eman used to teach religion. He's always
8 there, and like there's people always there. You wonder,
9 you know, and they do have the sites, so I know they do
10 distribution food.

11 Q. I'm going to show you now what's been admitted as --

12 (Video recording played)

13 Q. This is Government Exhibit BB37a. Is this the party you
14 were referring to?

15 A. Yes, sir.

16 Q. You were at this party?

17 A. Yes, sir.

18 Q. Who else was there?

19 A. A lot of people was there.

20 Q. What kind of people were there?

21 A. They were all have something to do with the food
22 program.

23 Q. The food program?

24 A. Yes.

25 Q. And who was this party given in honor of?

1 A. To Aimee.

2 Q. Why?

3 A. Because she won Department of Education and we can make
4 more fraud too.

5 Q. Is that what you did?

6 A. Yes, sir.

7 Q. Did Aimee Bock know why everyone was celebrating her?

8 A. Yes, sir.

9 Q. She knew about the fraud?

10 A. Yes, sir.

11 MR. THOMPSON: Thank you. No further questions,
12 Your Honor.

13 THE COURT: Mr. Udoibok, cross-examination.

14 MR. UDOIBOK: Thank you, Your Honor.

15 CROSS-EXAMINATION

16 BY MR. UDOIBOK:

17 Q. Is it Marekegn?

18 A. Marekegn.

19 Q. Marekegn. My name is Kenneth Udoibok, and I represent
20 Ms. Bock.

21 So I want to make sure that I understand your
22 testimony this morning.

23 So you grew up in Ethiopia, right?

24 A. Yes, sir.

25 Q. Do you speak -- how many languages do you speak?

1 A. Two.

2 Q. Which one and which?

3 A. Amharic and English.

4 Q. Okay. You don't speak Somalia, do you?

5 A. No, sir.

6 Q. All right. So I want to start out first with drawing
7 your attention to Exhibit BB37a that you just testified to.

8 Ms. Mallet, would you call that up, please.

9 Why don't you play it?

10 (Video recording played)

11 MR. UDOIBOK: That's enough.

12 BY MR. UDOIBOK:

13 Q. Do you understand what was said there?

14 A. My husband, he's Somalia.

15 Q. I know.

16 A. So --

17 Q. I know you said your husband, you said. I'm saying, do
18 you understand what was just spoken there?

19 A. What was just spoken there, I don't understand the
20 language.

21 Q. Thank you.

22 A. Yeah.

23 Q. So when you testify about what was said at that meeting,
24 was it something that someone else told you or what you
25 understood yourself?

1 A. I don't understand the language, but this call buranbur,
2 so I know.

3 Q. Okay. I want to focus first on -- you were asked by
4 Mr. Thompson earlier that after Feeding Our Future stopped
5 your relationship with Feeding Our Future, you continued to
6 go to another program, correct?

7 A. Yes, sir.

8 Q. And what program was that?

9 MR. THOMPSON: Objection, Your Honor. Relevance
10 and pretrial motion.

11 THE COURT: Sustained.

12 BY MR. UDOIBOK:

13 Q. All right. But nevertheless you continued. I believe
14 you testified in that other program you continued to submit
15 fraudulent claims, correct?

16 A. Yes, sir.

17 Q. All right. At this time Feeding Our Future has stopped
18 paying you, correct?

19 A. Yes, sir.

20 Q. All right. And when you -- about what time was this?
21 What year was this?

22 A. 2021.

23 Q. 2021. About what month?

24 A. That was they call after-school program.

25 Q. What month?

1 A. September.

2 Q. September?

3 A. Yes, sir.

4 Q. So when you went to another program and continued to do
5 this fraud, did you feel bad about it?

6 A. Yes, sir.

7 Q. You felt bad.

8 A. (Moves head up and down.)

9 Q. Is that a yes?

10 A. Yes, sir.

11 Q. But that badness didn't stop you from continuing the
12 criminal activity.

13 A. No, sir.

14 Q. Okay. So now who was your partner? I believe you
15 testified to the fact that Anab was your partner?

16 A. Yes, sir.

17 Q. Is it a he or she?

18 A. She.

19 Q. What's her full name? I didn't quite get it, because
20 you talk real softly.

21 A. It's Anab Awad.

22 Q. Anab Awad?

23 A. Yes, sir.

24 Q. Do you know whether Anab Awad was banned from Feeding
25 Our Future building at any time?

1 A. At that time, I did not know.

2 Q. All right. So during your relationship with Feeding Our
3 Future, was there any time that Anab was unable to go into
4 the Feeding Our Future building?

5 A. At the time I start, I did not know.

6 Q. All right. When you ended about -- did you end about
7 September 2021 with Feeding Our Future?

8 A. August 24th.

9 Q. August 24th?

10 A. Yes, sir.

11 Q. That's precise. Is there any reason why you remember
12 that date?

13 A. Because I knew it was almost the end of the month.

14 Q. All right. Almost the end of the month.

15 A. Yes, sir.

16 Q. And so at around August 24th, do you know whether Anab
17 was able to go to Feeding Our Future?

18 A. No, sir.

19 Q. Okay. Do you know why Ms. Bock, if you said Ms. Bock
20 wanted to meet with you at the cafe; is that correct?

21 A. Yes, sir.

22 Q. But not your cafe, though?

23 A. No, sir.

24 Q. Okay. And what time was, what time was that meeting?

25 A. Was right around, if I recall it right, oneish,

1 afternoon. Afternoon we met.

2 Q. What month?

3 A. Before August 24th.

4 Q. Before August 24th?

5 A. Yeah.

6 Q. Was it before your fight or after the fight?

7 A. Before the fight.

8 Q. Before the fight. That's when Ms. Bock wanted to meet
9 with you at the cafe?

10 A. Yes, sir.

11 Q. So, and you testified that you hired a lawyer. Was
12 this, was this, was the lawyer involved in the fight with
13 you?

14 A. He was not fighting with her, but he was fighting with
15 her lawyer.

16 Q. Okay. So your lawyer was fighting with Feeding Our
17 Future?

18 A. Aimee.

19 Q. Feeding Our Future lawyer?

20 A. Yes, sir.

21 Q. Okay. And you wanted, you wanted to be paid for that
22 \$3 million, didn't you?

23 A. Yes, sir.

24 Q. And you knew, you knew it was all fraudulent, correct?

25 A. Yes, sir.

1 Q. Now, and I don't want to ask you what you told your
2 lawyer. But were you at any time in the meeting with your
3 lawyer and Feeding Our Future lawyer?

4 A. Can you repeat the question?

5 Q. Did you attend any meeting with your lawyer and Feeding
6 Our Future lawyer?

7 A. I have never met Aimee Bock lawyer.

8 Q. Okay. I meant Feeding Our Future.

9 A. Yes, sir.

10 Q. Or --

11 A. Yes, sir.

12 Q. Did you tell anyone when you started submitting
13 fraudulent claims that what you doing was not good?

14 A. If I have told someone?

15 Q. Yeah.

16 A. No.

17 Q. Why not?

18 A. I -- that's wrong to tell.

19 Q. Okay. So I just want to -- I want to understand
20 something. Let's just -- I want to take it step-by-step a
21 little bit so I understand.

22 At some point you stopped dealing with Eidleh,
23 correct?

24 A. Yes, sir.

25 Q. Why?

1 A. Because he left the company.

2 Q. He left the country?

3 A. The company.

4 Q. The company?

5 A. Yes, sir.

6 Q. Okay. Do you know why he left the company?

7 A. I have no clue.

8 Q. All right. Did you try to reach him?

9 A. Yes.

10 Q. And did you talk to him?

11 A. Yes.

12 Q. And what did you gather was the reason he left the
13 company?

14 A. The conversation was not about he left the company.

15 Q. Excuse me?

16 A. The conversation we had was not because he left the
17 company.

18 Q. Why didn't you ask him why he left the company?

19 A. He was working at PC company in the Uptown area. I
20 don't know.

21 Q. Well, this is the man that was, based on your testimony,
22 that demanded money from you?

23 A. Yes, sir.

24 Q. And you gave him money?

25 A. Yes, sir.

1 Q. And you testified that he demanded 5 percent from you.

2 A. Yes, sir.

3 Q. Now, when you were giving Eidleh 5 percent --

4 A. Yes, sir.

5 Q. -- did Ms. Bock ever ask you for anything?

6 A. I did not know.

7 Q. You didn't know her?

8 A. Right.

9 Q. Okay. So the first time that Ms. Bock, based on your
10 testimony, asked you for money was around August or
11 September 2021.

12 A. Yes, sir.

13 Q. Right around the time that Ms. Bock had a meeting with
14 you about milk, correct?

15 A. Yes, sir.

16 Q. All right. I believe you testified that Ms. Bock told
17 you that your milk was not, your milk, your milk count was
18 not sufficient? Is that what --

19 A. That's what she said.

20 Q. I don't understand why, why milk? Why not oranges? Do
21 you know why?

22 A. We were not giving orange.

23 Q. You were not giving oranges?

24 A. Not orange juice.

25 Q. So why wasn't -- I didn't quite understand. What was

1 the issue with the number of milk not being sufficient? Why
2 is that important?

3 A. They count the meal with the milk, so when you --

4 Q. Oh, so -- go ahead.

5 A. The milk count goes with milk.

6 Q. So how many, how many milks -- I don't know the food
7 program. I'm learning as I'm going.

8 So how many milk counts would go with one gallon
9 milk?

10 A. That is one gallon of milk should be for one week.

11 Q. For one week.

12 A. Yes, sir.

13 Q. So when you bill 21,000, you didn't have enough milk to
14 go with 21,000, correct?

15 A. Yes, sir.

16 Q. Oh. And you testified earlier that you knew that that
17 was fraudulent, correct?

18 A. Yes, sir.

19 Q. Yes. And you fought it, correct?

20 A. Yes, sir.

21 Q. And you hire a lawyer to fight it, correct?

22 A. Yes, sir.

23 Q. And then Ms. Bock did not want to pay you for that meal
24 count, correct?

25 A. Yes, sir.

1 Q. And then you had a meeting with Ms. Bock, correct?

2 A. Yes, sir.

3 Q. Now, did you hire lawyer before that meeting or after
4 the meeting?

5 A. Before then.

6 Q. Well, so at this meeting you did not go to the meeting
7 with your lawyer, did you?

8 A. No, sir.

9 Q. You went by yourself?

10 A. Yes, sir.

11 Q. Why didn't you go with your lawyer?

12 A. This was not a meeting for the lawyer. She told me not
13 to bring my phone, so --

14 Q. Well, well, my question is, Who asked for the meeting?
15 Ms. Bock?

16 A. She did.

17 Q. Did you, why didn't you go with your lawyer?

18 A. I did not involve my lawyer. I had him before the food
19 program.

20 Q. You had --

21 A. He's been my lawyer for a long time.

22 Q. He was your lawyer for a long time?

23 A. Yes, sir.

24 Q. And so when you got into the food program, he continued
25 to represent you, correct?

1 A. When I had this problem, I start involving him.

2 Q. Yeah. When you had the problem -- I don't want to
3 interrupt. I'm sorry.

4 A. Sorry.

5 Q. When you had the problem, you -- and the problem is when
6 Ms. Bock refused to pay you the \$3 million invoice, correct?

7 A. Yes, sir.

8 Q. That's when you involve your lawyer?

9 A. Yes, sir.

10 Q. And you want your lawyer to make sure that Ms. Bock will
11 pay you the \$3 million invoice, correct?

12 A. Yes, sir.

13 Q. Now, and you knew that was a lie?

14 A. Yes, sir.

15 Q. And then after that, you had a meeting with Ms. Bock,
16 right?

17 A. Yes, sir.

18 Q. But you did not tell your lawyer that you were going to
19 have, going to that meeting, correct?

20 A. No.

21 Q. All right. And then at that meeting, your testimony is
22 Ms. Bock was suspicious and didn't want you to bring your
23 camera, your phone and your Apple watch in the meeting,
24 correct?

25 A. Yes, sir.

1 Q. Is it possible that Ms. Bock did not trust you as a
2 person?

3 A. Yes, sir.

4 Q. Correct. So at that meeting your testimony is she all
5 of a sudden -- never asked you for any money -- wanted you
6 to give her 50 percent of \$3 million.

7 A. Yes, sir.

8 Q. But you refused?

9 A. Yes, sir.

10 Q. And then you left and went to another program and
11 continued with fraud?

12 A. Yes, sir.

13 Q. At what point were you going to tell the truth? Is it
14 possible that the point came when you met with law
15 enforcement?

16 A. No, sir.

17 Q. All right. When was the first contact you had with law
18 enforcement in this case?

19 A. Around almost the end of 2021.

20 Q. Almost the end of 20 -- sometime in December 2021?

21 A. Yes.

22 Q. When did you stop submitting fraudulent claims?

23 A. September, October, November.

24 Q. November?

25 A. Yes, sir.

1 Q. So you stopped before law enforcement met you or
2 after --

3 A. Yes, sir.

4 Q. -- law enforcement met you?

5 A. Before.

6 Q. Before? What made you stop?

7 A. The program was done.

8 Q. The program was done.

9 A. Yes, sir.

10 Q. So if the program wasn't done, you would have still
11 continued?

12 A. Yes, sir.

13 Q. Now, what did you do with all that money?

14 A. Lived the American dream.

15 Q. Lived the American dream?

16 A. Yes, sir.

17 Q. Ms. Marekegn, you understand that's not American dream.

18 A. I understand very well now.

19 Q. I want you to explain a little bit clearly.

20 Ms. Mallet, will you pull up Q98 and go to the
21 second page, please. Just the second. Yes.

22 I believe you testified that this was a bill,
23 invoice, you had submitted. Who helped you create this
24 invoice?

25 A. This between me and Anab Awad and House of Refuge and

1 Omar Jamal.

2 Q. Do you know whether Feeding Our Future terminated House
3 of Refuge?

4 A. She did not terminate House of Refuge.

5 Q. What did -- House of Refuge wasn't part of Feeding Our
6 Future?

7 A. She was, but she was not terminated.

8 Q. She wasn't terminated?

9 A. (Moves head from side to side.)

10 Q. When did -- does House of Refuge continue to operate?

11 A. Yes, she did.

12 Q. All right. And till now?

13 A. What?

14 Q. Up to today?

15 A. No. She was terminated, but not when I was terminated.

16 Q. Oh, okay. Do you know when -- who terminated House of
17 Refuge?

18 A. She left Feeding Our Future herself.

19 Q. Okay.

20 A. Yes, sir.

21 Q. Did House of Refuge leave Feeding Our Future after the
22 \$3 million dispute?

23 A. No, sir.

24 Q. Okay. All right. So you testified that this was dry
25 food program?

1 A. Yes, sir.

2 Q. That's what this bill was about?

3 A. Yes, sir.

4 Q. What does that mean? What does dry food -- milk is not
5 dry. Did you provide milk?

6 A. Yes, sir.

7 Q. So how's it dry food if milk is included?

8 A. They call it dry food is because they're each individual
9 packaged food.

10 Q. All right. Did you actually purchase the milk?

11 A. I have some.

12 Q. All right. Where did you get the receipts of purchase
13 from?

14 A. I submitted whatever I had.

15 Q. Excuse me?

16 A. I submitted it whatever I had, the receipt.

17 Q. You submitted whatever you had. But was it -- did you
18 have enough receipt to show \$3 million purchase?

19 A. No, sir.

20 Q. So what were you expecting -- you didn't have enough
21 milk. The receipt doesn't meet, but yet you want to be
22 paid. What were you expecting? To be paid?

23 A. Yes, sir.

24 Q. Ms. Mallet, would you call up Q96, please.

25 This is an email that you sent to Feeding Our

1 Future claims, correct? Do you see that? That's your
2 email, Benti?

3 A. Yes, sir.

4 Q. And then to claims at Feeding Our Future, correct?

5 A. Yes, sir.

6 Q. That's sometime in May 2021?

7 A. Yes, sir.

8 Q. It's an April invoice?

9 A. Yes, sir.

10 Q. Ms. Mallet, would you go to the second page. Could you
11 call out the \$808,000?

12 You created this exhibit, didn't you?

13 A. Yes, sir.

14 Q. And you sent it to Feeding Our Future, correct?

15 A. Yes, sir.

16 Q. Again, who helped you create this exhibit?

17 A. Myself.

18 Q. Yourself?

19 A. Yes, sir.

20 Q. You testified about -- by the way, just another question
21 on that.

22 Sometime in May 2021, when you were preparing this
23 invoice --

24 A. This is for April invoice.

25 Q. April invoice?

1 A. Yes.

2 Q. Did you feel remorseful at all?

3 A. I'm sorry.

4 Q. Oh, sorry.

5 A. No problem.

6 Q. I'm trying to show I'm a lawyer using big words. I'm
7 sorry.

8 Did you feel bad?

9 A. For the invoice?

10 Q. Yes.

11 A. No, I did not feel bad at that moment.

12 Q. And you got the money?

13 A. Yes, sir.

14 Q. And you were living in your mind what the American dream
15 was?

16 A. Yes, sir.

17 Q. But now do you know that's not it, that most Americans
18 don't do this?

19 A. No. I understand now.

20 Q. Okay. So I believe you testified about Omar Jamal.

21 A. Yes, sir.

22 Q. Who is that?

23 A. It's a different guy I met at the food program time.

24 Q. At the food program time. What food program time are
25 you referring to?

1 A. At the COVID food program.

2 Q. Was that at the House of Refuge?

3 A. Yes, sir.

4 Q. All right. You testified earlier about Ms. Aimee Bock
5 being referred to as Sweet Aimee. All right?

6 A. Yes, sir.

7 Q. All right. And I believe you testified during your
8 direct examination by Mr. Thompson that Ms. Aimee Bock won a
9 lawsuit against the, against MDE, correct?

10 A. Yes, sir.

11 Q. Did you ever review any of the paperwork?

12 A. Never.

13 Q. All right. Do you know whether Ms. Bock or Feeding Our
14 Future filed a discrimination lawsuit? Do you know?

15 A. She said it.

16 Q. She said she filed a discrimination lawsuit?

17 A. She said because of that we're all color. If you see
18 the program, there's only color people involved.

19 Q. Okay. What do you mean "color people"? That means a
20 whole different -- I'm East African. You are East African,
21 right?

22 A. Yes.

23 Q. So when you say "color people," it has a whole different
24 meaning to me. What do you mean "color people"?

25 A. East African, East African.

1 Q. So Ms. Bock told you that she won a discrimination
2 lawsuit?

3 A. Yes, sir.

4 Q. All right. If I told you that there was no
5 discrimination lawsuit won by Feeding Our Future, Aimee
6 Bock, would you have any reason to doubt what I just said?

7 A. Because we were told the program was stop because she
8 was just serving East African community.

9 Q. Ms. Marekegn, do you realize that Feeding Our Future
10 brought a claim against MDE for MDE to approve or deny
11 claims? Are you aware of that?

12 A. Yes.

13 Q. All right. Is that the discrimination lawsuit that you
14 are referring to?

15 MR. THOMPSON: Objection. Foundation.

16 THE COURT: Overruled.

17 You may answer.

18 BY MR. UDOIBOK:

19 Q. You may answer.

20 A. Okay.

21 Q. Maybe I should make it easier.

22 A. Please.

23 Q. All right. You agree with me that Feeding Our Future
24 brought a claim against MDE in court in Minnesota?

25 A. Yes.

1 Q. Do you agree? All right. And the claim was for MDE to
2 approve or deny pending claims before MDE?

3 MR. THOMPSON: Objection. Foundation. She said
4 she hasn't reviewed the lawsuit.

5 THE COURT: Sustained.

6 MR. UDOIBOK: All right.

7 BY MR. UDOIBOK:

8 Q. So when you talking about Ms. Bock winning a
9 discrimination lawsuit, you are just guessing what it was?

10 MR. THOMPSON: Objection. That misstates her
11 testimony.

12 THE COURT: Sustained.

13 MR. UDOIBOK: All right.

14 BY MR. UDOIBOK:

15 Q. So you never reviewed any paperwork about a
16 discrimination lawsuit, did you?

17 A. No, sir.

18 Q. Did you review any legal work that Feeding Our Future
19 submitted to the courts?

20 A. No, sir.

21 Q. All right. So I would like to talk to you about Shamsia
22 Hopes. You testified to that?

23 A. Yes, sir.

24 Q. What is that?

25 A. It's a nonprofit organization.

1 Q. Okay. Who runs Shamsia Hopes?

2 A. Mekfira Hussein.

3 Q. I have in my notes I believe your testimony was you were
4 disconnected as a -- you were disconnected and you became a
5 vendor.

6 Is that what your testimony?

7 A. I was -- it was done the program because I was not
8 nonprofit.

9 Q. Excuse me?

10 A. I was not nonprofit.

11 Q. You were not a nonprofit. You were for-profit. So you
12 became a vendor?

13 A. Yes, sir.

14 Q. So you supplied food to Shamsia Hopes?

15 A. Yes, sir.

16 Q. All right. What type of food did you supply?

17 A. It was cooked food.

18 Q. Cooked food?

19 A. Yes.

20 Q. And then that cooked food, you supplied 2,000 meals a
21 day?

22 A. Yes, sir.

23 Q. All right. And that was also fraud?

24 A. What -- sorry?

25 Q. Did you cook 2,000 food?

1 A. No, I did not.

2 Q. Okay. But you sent the invoice of 2,000 food to Shamsia
3 Hopes?

4 A. Yes, we did.

5 Q. All right. And you were paid?

6 A. Yes, sir.

7 Q. And you spent the money, didn't you?

8 A. Yes, sir.

9 Q. You didn't tell anyone that it was fraud.

10 A. No, I did not tell.

11 Q. All right. So you also testified that in the spring of
12 2021 Mr. Eidleh didn't work at Feeding Our Future anymore.

13 A. Yes, sir.

14 Q. All right. So you stopped giving Mr. Eidleh the 5
15 percent?

16 A. Yes, sir.

17 Q. I want to make sure I understand your testimony
18 correctly, because earlier during your direct examination
19 you had said something, you said on one hand that Mr. Eidleh
20 demanded 5 percent and then I think -- 15 -- I think you
21 corrected -- 15 percent and then you corrected to 5.

22 I want to clearly, what is the percent that
23 Mr. Eidleh demanded from you?

24 A. 5 percent.

25 Q. 5 percent. Not 15. Okay.

1 MR. UDOIBOK: Thank you, Your Honor.

2 BY MR. UDOIBOK:

3 Q. Ms. Marekegn, just, I have just one or two questions for
4 you.

5 A. Okay.

6 Q. All right. So it is your testimony that the one time
7 Ms. Bock solicited money from you throughout your
8 relationship with Feeding Our Future was when she asked you
9 for about \$1.5 million in cash?

10 A. Yes, sir.

11 Q. All right. And you know getting \$1.5 million in cash,
12 that's -- you know that's almost impossible?

13 A. Yes, I know.

14 MR. UDOIBOK: Okay. No further questions.

15 THE COURT: Thank you.

16 Mr. Montez.

17 MR. MONTEZ: No questions, Your Honor.

18 THE COURT: Mr. Thompson.

19 MR. THOMPSON: No further questions, Your Honor.

20 THE COURT: Thank you.

21 And you may step down. Thank you. You are
22 finished. Thank you.

23 And the government may call its next witnesses.

24 MR. BOBIER: Sorry for the wait, Your Honor.

25 THE COURT: That's all right.

1 MR. BOBIER: Your Honor, the government calls --
2 Your Honor, are you ready for the next witness?

3 THE COURT: I am.

4 MR. BOBIER: The government calls Genesis Alonso.

5 THE COURT: Good afternoon. Just come forward to
6 me, and I will have you come before me and stand to take the
7 oath.

8 GENESIS ALONSO,
9 called on behalf of the government, was duly sworn, was
10 examined and testified as follows:

11 THE WITNESS: Yes.

12 THE COURT: Thank you. You may be seated.

13 And then when you are comfortable, please state
14 and spell both your first and last name for the record.

15 THE WITNESS: Genesis Alonso, G-E-N-E-S-I-S
16 A-L-O-N-S-O.

17 THE COURT: Thank you.

18 Mr. Bobier, you may inquire.

19 MR. BOBIER: Thank you, Your Honor.

20 DIRECT EXAMINATION

21 BY MR. BOBIER:

22 Q. Ms. Alonso, good afternoon.

23 A. Good afternoon.

24 Q. How are you doing today?

25 A. Good.

1 Q. First time in a federal courtroom?

2 A. Yeah.

3 Q. Let's just have a conversation, and I'll ask questions.

4 Please wait until I'm done asking them for our court

5 reporter. Then you answer them, and it will feel normal

6 before you know it. Okay?

7 A. Okay.

8 Q. Could you tell the jury what you do for a living?

9 A. I do eyelashes.

10 Q. Eyelashes?

11 A. Yeah.

12 Q. Is that --

13 A. Eyelash extensions.

14 Q. Like gluing them individually?

15 A. Yeah.

16 Q. Take a lot of time?

17 A. Yeah.

18 Q. Got to have very steady hands?

19 A. You do.

20 Q. Okay. This morning while the rest of us were in court,

21 is that what you were up to?

22 A. No. I was on a field trip with my niece.

23 Q. Where were you on a field trip with your niece?

24 A. Feed Our Starving Children in Chanhassen.

25 Q. What is Feed Our Starving Children?

1 A. You pack food and send it to other kids across the
2 country.

3 Q. So that's what you were doing with your niece this
4 morning?

5 A. Yeah.

6 Q. On a field trip?

7 A. Yeah.

8 Q. I want to ask a little bit about your background so the
9 jury understands a bit more about you. Okay.

10 A. Okay.

11 Q. Where are you from?

12 A. St. Louis Park, Minnesota.

13 Q. Is that where you were born?

14 A. No. Shakopee, Minnesota.

15 Q. Have you always lived in Minnesota?

16 A. I lived in Texas for almost four years.

17 Q. When were the four years you were in Texas?

18 A. 2017 till almost 2020.

19 Q. After you got back from Texas, I take it you moved back
20 here?

21 A. Yeah, to Minnesota.

22 Q. And where do you live now?

23 A. In St. Louis Park.

24 Q. How far did you go in school, Ms. Alonso?

25 A. I dropped out in high school.

1 Q. And where were you in high school?

2 A. In Arlington, Texas.

3 Q. So you were in high school down there, and then at some
4 point you moved in 2020 back up to Minnesota?

5 A. Well, 2019, yeah.

6 Q. Thank you. Back up to Minnesota; is that right?

7 A. Yeah.

8 Q. Tell us what you did for work when you left school.

9 A. In Minnesota?

10 Q. Sure.

11 A. I worked at a call center, and then I worked at
12 Shutterfly and then Feeding Our Future.

13 Q. What did you do at the call center?

14 A. Answered calls.

15 Q. What was that like?

16 A. For claims like insurance.

17 Q. Got it. And you said you worked at Shutterfly?

18 A. Yeah.

19 Q. What's Shutterfly?

20 A. Like photos, editing photos.

21 Q. Okay. A little bit different than the first job?

22 A. Yeah.

23 Q. You like that better?

24 A. A little bit.

25 Q. Then you said there's a job after that, right?

1 A. Yeah.

2 Q. And where was that?

3 A. Feeding Our Future.

4 Q. I want to ask you a little bit about how you came to
5 work there. Okay?

6 A. Yeah.

7 Q. That's all right. Before you started working at Feeding
8 Our Future, had you been working at Shutterfly immediately
9 prior?

10 A. No. I was on you know employment because COVID hit.

11 Q. A lot of people had trouble with work during COVID,
12 right?

13 A. Yeah.

14 Q. So you were on unemployment. COVID has hit. What was
15 the first time that you heard about Feeding Our Future?

16 A. In June of 2020.

17 Q. And how did you hear about it?

18 A. My mom was friends with the owner of Feeding Our Future.

19 Q. Who is the owner?

20 A. Aimee.

21 Q. Aimee Bock?

22 A. Yeah.

23 Q. What's your mom's name?

24 A. Norma Cabadas.

25 Q. How did your mom, Norma Cabadas, know Aimee Bock?

1 A. They were friends from years ago from working at a child
2 care center.

3 Q. In Minnesota?

4 A. In Minnesota.

5 Q. So what was the first that your mom heard about Feeding
6 Our Future?

7 A. It was in June of 2020.

8 Q. And what did she hear?

9 A. That they were hiring.

10 Q. Who did she hear that from?

11 A. Aimee Bock.

12 Q. Do you know how they were communicating?

13 A. They are friends I think through Facebook.

14 Q. Okay. So your mom hears that Feeding Our Future, that
15 Aimee Bock, are hiring. And at this point you don't have a
16 job, right?

17 A. No.

18 Q. How about your mom? Is she working at the time?

19 A. She was working at Shutterfly too.

20 Q. Okay. So what did you and your mom hear from Aimee Bock
21 about possibly taking a position at Feeding Our Future?

22 A. But we just went to like an interview, and then we got
23 the job.

24 Q. Where was the interview?

25 A. In St. Anthony.

1 Q. Was it at Feeding Our Future?

2 A. Yeah, at Feeding Our Future.

3 Q. Who did you meet there?

4 A. Aimee Bock, and then I think Coley was there the first
5 time I went.

6 Q. Was that Coley Flynn?

7 A. Yeah.

8 Q. So tell us about this interview. Is it a sit-down
9 process, you had a resume in hand, or was it more informal?

10 A. More informal.

11 Q. Tell the jury about it.

12 A. Just our information, social security, and then just
13 talking about what the job requirements were, I guess.

14 Q. Talking with Aimee Bock about it?

15 A. Yeah.

16 Q. What did Aimee Bock say about the job requirements for
17 Feeding Our Future?

18 A. Just a lot of paperwork. There's no like actual
19 requirement, I guess, like school or anything.

20 Q. Did she tell you then anything about the lot of
21 paperwork you might be doing?

22 A. No, just a lot of data entry.

23 Q. How long was this interview?

24 A. I don't remember.

25 Q. Was it a full day, or was it --

1 A. No. It was just a little, under an hour.

2 Q. And after that hour interview, you and your mom got
3 hired, right?

4 A. Yeah.

5 Q. What position did you get hired for?

6 A. Coordinator, food program coordinator, I think so.

7 Q. That was your title?

8 A. Yeah.

9 Q. Now before we delve into what you were doing in the role
10 of coordinator, can you tell us the time frame overall that
11 you worked at Feeding Our Future?

12 A. I started in June 2020, and I left December of 2021,
13 around there.

14 Q. At a high level in that year and a half that you were
15 working at Feeding Our Future, what were your
16 responsibilities day-to-day?

17 A. Enter menus, receipts, and that's kind of -- menus and
18 receipts.

19 Q. A lot of data entry?

20 A. Yeah, data entry.

21 Q. Now, the jury's heard from some witnesses about things
22 called site visits. Are you familiar with that phrase?

23 A. Yeah.

24 Q. Was it part of your job to do site visits, or were you
25 mostly doing other things?

1 A. No, that wasn't part of my job.

2 Q. You were mostly data entry; is that true?

3 A. Yeah.

4 Q. Did you ever, though, visit a site called Safari?

5 A. At one time, yes.

6 Q. One time? That's the Safari Restaurant; is that right?

7 A. Yeah.

8 Q. In Minneapolis?

9 A. Yeah.

10 Q. Tell us about that one time you went.

11 A. They were setting up for a wedding, so there wasn't

12 really much going on. They were just setting up for a

13 wedding, putting some food out.

14 Q. When you say, "They were setting up for a wedding," who

15 are you talking about?

16 A. The people working at Safari.

17 Q. So were you at Safari for food distribution to children

18 or --

19 A. No. We were looking at the site. They were showing us

20 that it's one of the sites that's feeding kids the most.

21 Q. One of the sites working with Feeding Our Future; is

22 that right?

23 A. Yeah.

24 Q. So at the time that you visited Safari that one time,

25 there wasn't a food distribution going on to kids; is that

1 right?

2 A. They were handing out some food, yeah.

3 Q. Was the food being given out to people dropping by?

4 A. From what I remember, there was some cars coming in
5 through the back, and there was just some boxes being given
6 to them.

7 Q. How many cars?

8 A. I don't remember.

9 Q. How long were you there?

10 A. Maybe like an hour or less.

11 Q. During that hour, are we talking five cars or are we
12 talking 500?

13 A. Not five but not 500.

14 Q. What do you think?

15 A. Maybe like 10 to 15.

16 Q. Okay. You said you went to high school in Texas for a
17 while; is that right?

18 A. Yeah.

19 Q. How big was that high school?

20 A. Pretty big.

21 Q. Thousands?

22 A. Thousands of kids, yeah.

23 Q. Do you know how many?

24 A. No, but over 3,000.

25 Q. It's a big high school.

1 A. Yeah.

2 Q. Were there meals being distributed that day you were at
3 Safari Restaurant to as many people as attended your high
4 school?

5 A. No.

6 Q. Anywhere close?

7 A. No.

8 Q. Do you think Safari Restaurant from what you saw of it
9 could distribute enough meals in a single day --

10 MR. MONTEZ: Objection.

11 MR. BOBIER: -- to as many kids as went to your
12 high school?

13 MR. MONTEZ: Objection. Calls for speculation.

14 THE COURT: Overruled.

15 You may answer.

16 THE WITNESS: No.

17 MR. BOBIER: Why not?

18 THE WITNESS: Because I don't think it's big
19 enough to feed as many kids as the high school I went to.

20 BY MR. BOBIER:

21 Q. Is your high school a lot bigger than Safari Restaurant?

22 A. Definitely.

23 Q. Is the cafeteria at your high school a lot bigger?

24 A. Yeah.

25 Q. All right. So site visits, not really your

1 responsibility, right?

2 A. No.

3 Q. But were you aware of site visits occurring while you
4 were at Feeding Our Future?

5 A. At the beginning, yeah.

6 Q. Why do you say, "At the beginning"?

7 A. They had stopped because of COVID spiking for a little
8 bit.

9 Q. Could you explain that?

10 A. There was just more COVID cases, so we had taken a break
11 and started working on more stuff in the office to get the
12 sites.

13 Q. When you say you took a break, what time are we talking
14 about here?

15 A. I don't remember exactly, but maybe like fall of 2020.

16 Q. So in the fall of 2020, what happened as far as you are
17 aware with site visits at Feeding Our Future?

18 A. They were paused for a little bit.

19 Q. They were paused?

20 A. Yeah.

21 Q. Wasn't happening at all as far as you know?

22 A. I don't know if they were doing any or not, but as far
23 as I know.

24 Q. On the days when site visits were occurring at the
25 beginning that you described, were folks in the office that

1 you worked near leaving to do those visits?

2 A. The site support, yeah.

3 MR. UDOIBOK: Objection. Calls for speculation.

4 THE COURT: Overruled. The answer will stand.

5 BY MR. BOBIER:

6 Q. And then during the period you're describing in the fall
7 of 2020 where you said the site visits paused, did the
8 support folks from the office continue to leave, or did they
9 just stay in the office all day?

10 A. It was kind of a mix. They would have to go do
11 different things for the sites as well.

12 Q. But as far as you know, the sites visits themselves were
13 paused?

14 A. As far as I know, yeah.

15 Q. You said your main responsibility was data entry?

16 A. Yeah.

17 Q. Let me ask you a few things about that. You mentioned
18 menus at the beginning.

19 A. Yeah.

20 Q. What's a menu in the context of Feeding Our Future?

21 A. Menus that the sites are giving us on what they are
22 feeding kids.

23 Q. Okay. Describing the food that each site is supposedly
24 handing out; is that right?

25 A. Yeah.

1 Q. And what would you do with these menus?

2 A. Enter them in.

3 Q. Enter them where?

4 A. To CenterPilot.

5 Q. What is CenterPilot?

6 A. A program we used to keep track of everything for the
7 sites.

8 Q. And what was the point of it? Why enter menus anywhere
9 at all?

10 A. Because they need everything, menu, receipts, everything
11 to get paid.

12 Q. Who needed that to get paid?

13 A. The sites.

14 Q. Okay. Let me make sure I have that right. You enter
15 the menus into CenterPilot, which is the system at Feeding
16 Our Future.

17 A. Mm-hmm.

18 Q. Is that right?

19 A. Yeah.

20 Q. And what happens for a site if there is no menu entered
21 by the Feeding Our Future team for that site?

22 A. Then they don't get paid.

23 Q. They don't get paid?

24 A. No.

25 Q. How would you get these menus from the sites?

1 A. Site support or the sites would bring them in themselves
2 or sometimes email it.

3 Q. Let me ask you about the email. The jury's heard a lot
4 about an email address claims@feedingourfuturemn.org.

5 Does that sound familiar?

6 A. Yeah.

7 Q. What do you remember about that email address?

8 A. Well, it was made for directly claims.

9 Q. The sites would have access to that email address? In
10 other words, they would submit their information to that
11 email address; is that right?

12 A. Yeah.

13 Q. And you and others would be able to access that email
14 address, pull down whatever the sites had submitted and
15 enter it?

16 A. Yeah.

17 Q. Who had access to claims@feedingourfuturemn.org?

18 A. Aimee, my mom Norma, and then the other Norma, and then
19 we had access to it as well.

20 Q. So you had access, right?

21 A. Yeah.

22 Q. As did Aimee Bock?

23 A. Yeah.

24 Q. Let me show you on your screen there Government's B21,
25 which is in evidence.

1 Let's hope that was worth it.

2 Ms. Alonso, the top of this email here on B27,
3 this is a submission from Safari Restaurant at gmail. Do
4 you see that?

5 A. Yeah.

6 Q. And that's going to, among other recipients,
7 claims@feedingourfuturemn.org; is that right?

8 A. Yeah.

9 Q. Is that the email we're talking about, that's how you
10 and some other folks at Feeding Our Future would receive
11 information from the sites?

12 A. Yes.

13 Q. That's the email address that Aimee Bock had access to?

14 A. Yes.

15 Q. How do you know she had access to it?

16 A. Because I think her and my mom made it together.

17 Q. Do you know where the password to that account was kept?

18 A. I believe my mom, Coley and Aimee had the password on
19 their desks.

20 Q. On their desks?

21 A. Yeah.

22 Q. Now when you say you were entering menus into
23 CenterPilot at Feeding Our Future, were you tasked with
24 making sure menus were accurate, or were you just entering
25 whatever was on the piece of paper?

1 A. Both.

2 Q. Okay. Let's talk about that. When you were entering
3 menus, were you familiar with something called a meal
4 pattern?

5 A. Yes.

6 Q. At Feeding Our Future, the jury's heard a little bit
7 about this, but what was a meal pattern?

8 A. Basically everything they need in a meal for it to be
9 qualified as a like a healthy meal.

10 Q. And if a meal wasn't qualified, if it didn't fit the
11 meal pattern, could you get paid for it?

12 A. Yeah. I mean, you're feeding kids, so yeah.

13 Q. Let's talk about that. You said if you don't have a
14 menu, you don't get paid; is that right?

15 A. Yeah.

16 Q. Was it consistent in your experience that the sites
17 would always give you menus to be entered?

18 A. Sometimes we had to fight with them about it, but for
19 the most part, yeah.

20 Q. When they didn't give you menus, what would happen?

21 A. Their claim would be paid late or they wouldn't be paid.

22 Q. What would happen when a site wouldn't have a menu and
23 you would be left with nothing to enter into CenterPilot?

24 A. We would have to request it a few times, and then if
25 not, we just had to put the generic menu.

1 Q. What's a generic menu?

2 A. A menu kind of like a generic menu. The menu is already
3 made -- not made, but the milk, two percent and stuff like
4 that.

5 Q. Okay. Let me break that down. So at Feeding Our Future
6 there was something called a generic menu, right?

7 A. Yeah.

8 Q. And that was a menu that met the meal pattern, right?

9 A. Yeah.

10 Q. And if you were actually giving out the items on the
11 generic menu, it would get paid, right?

12 A. Yeah.

13 Q. But when a site would not have a menu to give you and
14 your reach-outs that you describe to get that menu wouldn't
15 result in them giving you any information, you would just
16 enter into CenterPilot for that site the generic menu; is
17 that right?

18 A. Yeah, or if they had food that wasn't -- because it's
19 certain foods that are already listed on CenterPilot, so if
20 they had something that was like, like a Somali dish or
21 something, we would have to put a generic menu because it's
22 not in the drop box what they are serving or whatever.

23 Q. It's not in the box to enter into CenterPilot, right?

24 A. Right. It doesn't give the option of what they put.

25 Q. And if you don't enter a complete menu that fits the

1 meal pattern into CenterPilot, what would happen?

2 A. They don't get paid.

3 Q. So were there times that sites got paid because staff
4 entered the generic menu?

5 A. Yes.

6 Q. Even when the site didn't provide you a real menu, based
7 on what they said they were giving out?

8 A. Yes.

9 Q. Did Aimee Bock know about the generic menu?

10 A. Yeah, I believe so.

11 Q. Why do you say that?

12 A. I mean, everyone knew about it.

13 Q. Did you ever discuss it at a meeting, for example?

14 A. Yeah. We had meetings, and we would talk about generic
15 menus.

16 Q. Meetings that Aimee Bock attended?

17 A. Yeah, most of them.

18 Q. Did that concern you at all when you'd enter a generic
19 menu and it didn't match whether you knew the food on that
20 menu was actually being given out at the site?

21 A. Not all the time because some sites would, like I said,
22 serve different meals that weren't on the drop box of what
23 was already entered into CenterPilot.

24 Q. But it wasn't your job to change the software, right?

25 A. No.

1 Q. Or to expand the options on the drop down. That wasn't
2 you?

3 A. No.

4 Q. You were entering something, either given you from the
5 site or just the generic menu sitting around at Feeding Our
6 Future, you'd do one or the other, right?

7 A. Yeah.

8 Q. And why would you do that?

9 A. So they can get paid.

10 Q. At the beginning when you were describing the types of
11 information you entered, you said menus. We talked about
12 those a little, right?

13 A. Mm-hmm.

14 Q. You also mentioned invoices or receipts?

15 A. Yeah.

16 Q. What did you do with invoices or receipts while you were
17 entering data at Feeding Our Future?

18 A. Enter them into CenterPilot.

19 Q. Okay. Same software we were just talking about?

20 A. Yeah.

21 Q. And that's basically used by the team at Feeding Our
22 Future to collect the information for the sites; is that
23 right?

24 A. Yeah.

25 Q. Let me ask you a bit about the invoices you'd receive.

1 When you would get invoices from the sites, did they ever
2 cause you to be concerned?

3 A. At the beginning, no, but then eventually, yeah.

4 Q. What happened eventually?

5 A. They were just really big receipts or they were just
6 some -- the receipts were like documents entered on to
7 Google Docs that were typed.

8 Q. What do you mean "that were typed"?

9 A. You could edit them if you wanted to.

10 Q. What concerned you about receiving from sites receipts
11 that were editable?

12 A. That they are not actual receipts. They are typed.

13 Q. Why did you feel that way?

14 A. Because of somebody typing them.

15 Q. Let me talk about those typed invoices a bit. Let's
16 take a step back.

17 These invoices that you are reviewing, are they
18 supposedly created at the site, or are they supposedly
19 created by a vendor giving food to the site to give out to
20 kids?

21 A. The vendor.

22 Q. Okay. So I should think about Costco or Sysco. That's
23 the kind of thing if I were really giving food out to kids
24 there might be only invoices from those kinds of places; is
25 that right?

1 A. Yeah. There's different types of food organizations, so
2 different, there was classical and Restaurant Depot,
3 different places.

4 Q. But were Costco and Restaurant Depot the only types
5 of --

6 A. No.

7 Q. -- businesses you saw in those receipts?

8 A. No.

9 Q. What were some of the other ones?

10 A. S & S Catering, Evergreen Deli, and kind of every --
11 Walmart, Sam's Club.

12 Q. You mentioned S & S Catering; is that right?

13 A. Yeah.

14 Q. What's S & S Catering?

15 A. A food place, a deli place.

16 Q. As far as you know a place you'd get invoices from?

17 A. Yeah.

18 Q. Associated with sites?

19 A. Yeah.

20 Q. Do you know who worked with S & S Catering or who owned
21 it?

22 A. I don't remember.

23 Q. Tell me what you do remember about the invoices from
24 S & S Catering.

25 A. They were big invoices.

1 Q. How big?

2 A. Sometimes over 500,000. Sometimes 98,000.

3 Q. Let me show you Government's Q6, which is in evidence.

4 Going down to the second page, is this kind of document the
5 one we were talking about?

6 A. Yeah.

7 Q. Do you recognize seeing invoices like this one from
8 S & S Catering?

9 A. Yeah.

10 Q. What do you remember about these kinds of invoices?

11 A. Sometimes they had the same invoice number.

12 Q. I'm sorry. What does that mean? Like if I zoom in here
13 at the top, I can enlarge it. I see an invoice number here
14 on the top right, 0990.

15 A. Yeah.

16 Q. Is that what you were talking about?

17 A. Yeah.

18 Q. What do you mean sometimes they'd have the same invoice
19 number?

20 A. Sometimes they would -- I mean if you put them next to
21 each other, they had the same invoice number.

22 Q. You mean multiple invoices would come in?

23 A. Yeah.

24 Q. And they would be different invoices, but the number at
25 the top would be the same?

1 A. Yeah.

2 Q. What was concerning to you about that?

3 A. The fact that it was the same invoice number.

4 Q. Is that what you'd expect to see on a legitimate
5 invoice?

6 A. No.

7 Q. When you saw something like that, got multiple invoices
8 from S & S Catering or another vendor submitted to you using
9 the same invoice number but on different invoices, what did
10 you do?

11 A. Reach out to the site or the site support.

12 Q. And did you always get answers from the site or site
13 support that satisfied you about what you were seeing?

14 A. Not always.

15 Q. What would happen when you weren't getting answers? Who
16 at Feeding Our Future would you take these issues to, if
17 anyone?

18 A. Aimee.

19 Q. You would tell her that, for example, you are getting
20 multiple invoices that are different but have the same
21 number?

22 A. Yeah, I would bring it to her attention.

23 Q. Why would you bring it to Aimee Bock's attention?

24 A. Because she's the boss.

25 Q. She's the boss. She's in charge of Feeding Our Future?

1 A. Yeah.

2 Q. When you bring invoices like that to Aimee Bock, what
3 would she do with them?

4 A. Put them on her desk.

5 Q. Would she tell you anything about them?

6 A. She was going to talk to them, to the sites.

7 Q. Talk to the sites. And then as far as you know, when
8 you would bring invoices like this to Aimee Bock, would
9 those claims get paid?

10 A. As far as I know, most of them got paid.

11 Q. You also mentioned some of the invoices you saw were
12 very big; is that right?

13 A. Yeah.

14 Q. So if we look lower in this same document, Government's
15 Q6 --

16 First of all, if we just look at the entries for
17 March 1st, it looks like about \$18,000 billed in one day; is
18 that right?

19 A. Yeah.

20 Q. Is that the kind of large invoice you are talking about
21 that you would see sometimes at Feeding Our Future?

22 A. No.

23 Q. No? Let's go to the bottom. So all told, this S & S
24 invoice for a single month, it's about half a million
25 dollars, isn't it?

1 A. Yeah.

2 Q. All right. Ms. Alonso, is that the kind of big number
3 that you would sometimes see on the invoices?

4 A. Yes.

5 Q. Pretty big invoice?

6 A. Yeah.

7 Q. All right. So sometimes you saw invoices that were very
8 large?

9 A. Yeah.

10 Q. Sometimes you saw them with the same number on multiple
11 documents.

12 Did you ever see invoices with items that didn't
13 seem to be food?

14 A. Sometimes.

15 Q. What sorts of things would you see?

16 A. Different things like plates, cups. I remember one time
17 there was like a woman hygiene products, like pads,
18 different stuff.

19 Q. When you see those sorts of things, pads, plates, not
20 food, did that cause you concerns given that these were
21 receipts submitted to Feeding Our Future in support of
22 claims?

23 A. Yeah. They weren't frequently different items. And if
24 it were, we would just take it off into other expenses when
25 we would enter the claim or the receipt. Sorry.

1 Q. You mentioned "other expenses"?

2 A. Yeah.

3 Q. Are you describing a category from that drop down you
4 mentioned on CenterPilot?

5 A. Yeah.

6 Q. So there are categories in the software, and one of them
7 is just "other"?

8 A. Yeah.

9 Q. And that's where you would enter the things you would
10 see on these invoices, like the female hygiene products,
11 like the plates --

12 A. Yeah.

13 Q. -- that didn't seem to match food; is that right?

14 A. Yeah.

15 Q. Why would you enter those items in the "other" category?

16 A. Because they weren't food expense.

17 Q. Why would you enter them at all?

18 A. Because that was my job. I had to enter it.

19 Q. Why did you have to enter it?

20 A. Because it was another expense, so anything that's on
21 the receipt has to be entered.

22 Q. Anything that's on the receipt has to be entered?

23 A. Yeah.

24 Q. Whose rule was that?

25 A. Everyone's. I mean --

1 Q. Everyone at Feeding Our Future?

2 A. Yeah.

3 Q. Tell us about that.

4 A. We all have requirements, so we have to enter what's on
5 the receipt. So if it's food, we have to enter food. If
6 it's other expenses, we have to list it so they know what
7 other expenses it is.

8 Q. And just so we are clear, the items entered into
9 CenterPilot, that supports the check that's cut to the site,
10 right?

11 MR. UDOIBOK: Objection. Leading.

12 THE COURT: Wait. Sustained as to leading.

13 BY MR. BOBIER:

14 Q. Why would you enter those items into CenterPilot?

15 A. Because that was what was turned in.

16 Q. If you didn't enter items into CenterPilot, would the
17 site get paid?

18 A. Yeah. I mean, they have to have receipts regardless to
19 process.

20 Q. I'm sorry. If, for example, you told us earlier, if
21 there was no menu entered, the claim wouldn't be paid,
22 right?

23 A. Yeah.

24 Q. When you were entering things into the other category,
25 as far as you know, were the items entered in the other

1 category paid to the sites?

2 A. Yeah, because sometimes it was like plates and stuff
3 that were feeding the kids.

4 Q. But sometimes it was female hygiene products and other
5 things?

6 A. Yeah.

7 Q. And you would enter those too, right?

8 A. Yes, they are listed in other expenses. I'm not sure if
9 they're paid exactly for the other expenses, but I'm pretty
10 sure.

11 Q. We talked about the receipts. I want to ask you about
12 comparing those receipts to claims. Okay?

13 A. Okay.

14 Q. We looked at some of the invoices together. You've
15 mentioned the S & S ones in particular.

16 Did you ever while you were entering this data
17 into CenterPilot compare the receipts that you were getting
18 from the sites to the claims that the site was providing
19 you?

20 A. Not all the time, but sometimes.

21 Q. And on the occasions you did that, what sorts of things
22 would you see?

23 A. Sometimes the receipts wouldn't add up to the claims.

24 Q. What do you mean by that?

25 A. Sometimes the claims were more than what the receipts

1 was, what was on the receipts.

2 Q. Sometimes there wouldn't be enough totals on the receipt
3 to match the claim; is that right?

4 A. Yeah.

5 Q. Any examples of that stick out in your mind as
6 memorable?

7 A. No, not that I can remember.

8 Q. But you remember it happening only once or several
9 times?

10 A. A few times.

11 Q. When this would happen that you would get invoices much
12 larger than the -- I'm sorry. Strike that.

13 When this would happen that you would get claims
14 larger than the receipts you were given, would you bring
15 those to Aimee Bock's attention too?

16 A. Sometimes, or sometimes I just ignore it.

17 Q. Ignore it and do what?

18 A. Keep working.

19 Q. Keep entering the claims?

20 A. Yeah.

21 Q. Because you have to enter the claims?

22 A. Yeah. I wasn't doing claims, but the menus and
23 receipts, yeah.

24 Q. Keep entering the paperwork?

25 A. Yeah.

1 Q. To pay the sites?

2 A. Yeah.

3 Q. On those occasions that you would bring those big gaps
4 to Aimee Bock's attention, the gap between the receipts not
5 being large enough to match the claims from the site, what
6 would Aimee do with them?

7 A. Put them on her desk and work on them.

8 Q. Did she tell you anything about them?

9 A. No.

10 Q. So you'd bring the claims that were causing you the
11 concerns you described to Aimee Bock. She put them on her
12 desk. As far as you know, were those claims generally paid?

13 A. Most of them for the most part, yeah.

14 Q. Let me ask you about something called Monday.com. Are
15 you familiar with that?

16 A. Yeah.

17 Q. Did you use that at Feeding Our Future?

18 A. Yeah.

19 Q. What was Monday.com?

20 A. It was kind of where we would communicate more between
21 us, the employees.

22 Q. It was an internal communication platform; is that fair?

23 A. Yeah.

24 Q. Whether you would bring these invoices you described,
25 for example, with the same invoice number on different

1 invoices to Aimee Bock, were you ever instructed to make a
2 note about them in Monday.com?

3 A. Yeah.

4 Q. Aimee would instruct you to do that?

5 A. I mean, everyone would. Whoever that was the manager
6 would instruct us to leave notes, everyone.

7 Q. But on occasions, including Aimee Bock?

8 A. Yeah.

9 Q. What sorts of notes would you write in Monday.com about
10 the concerning invoices or the concerning claim and receipts
11 that you were seeing?

12 A. Just notate that either the receipts weren't adding up
13 or just whatever was going on with the site.

14 Q. Did Aimee Bock have access to Monday.com?

15 A. Yeah.

16 Q. How do you know that?

17 A. Everyone had access to it.

18 Q. Including the boss?

19 A. Yeah.

20 Q. Was there a function in Monday.com like a read receipt?

21 A. Yeah. Whenever anyone would leave, you could see their
22 initials.

23 Q. So if you and I were both on Monday.com and you made a
24 post, and then I looked at it later, you sitting at your
25 computer could tell that I'd looked at it; is that right?

1 A. Yeah, whoever did it.

2 Q. And on the occasions that you would put your concerns
3 from the paperwork that you had seen into Monday.com, did
4 you sometimes see that a read receipt would appear for Aimee
5 Bock?

6 A. Yeah, or for the site support. Any time you update,
7 everyone gets a notification.

8 Q. Including her read receipts; is that right?

9 A. Yeah.

10 Q. Ultimately, Ms. Alonso, when you would raise these kinds
11 of issues about the claims, about the receipts you were
12 mentioning, the size of the receipts, the other category on
13 them, were they generally paid?

14 A. For the most part, as far as I can remember, yeah.

15 Q. Let me ask you about a few examples. Do you remember a
16 group called ABC Learning?

17 A. Yeah.

18 Q. Why do you remember that group?

19 A. Because of their claims.

20 Q. What about their claims was memorable?

21 A. They had big claims.

22 Q. How big?

23 A. I don't remember exactly.

24 Q. Was it claims like the S & S invoices we looked at, half
25 million dollars for a month?

1 MR. UDOIBOK: Objection. Leading.

2 THE COURT: Sustained.

3 THE WITNESS: I don't remember. I don't remember
4 exactly, but yeah, I think.

5 BY MR. BOBIER:

6 Q. Large enough for you to remember today, though?

7 A. Yeah.

8 Q. Do you remember any sites called youth, youth sites?

9 A. Yeah, but we weren't in charge of those.

10 Q. Who do you mean, "We weren't in charge"?

11 A. Site coordinators.

12 Q. You mean you personally weren't in charge of them.

13 A. Yeah. I wasn't.

14 Q. But are you aware of the youth sites as being Feeding
15 Our Future sites?

16 A. Yeah.

17 Q. Even though you weren't personally in charge of those,
18 did you ever see invoices come in from youth sites?

19 A. Sometimes.

20 Q. Do you remember anything about them?

21 A. No, not exactly.

22 Q. If I show you Government's Q6 again, we go down to the
23 second page, or rather, the third one, this was the half
24 million dollar invoice we just looked at. Do you remember
25 that?

1 A. Yeah.

2 Q. And you said this was one of the particularly big ones
3 that was the kind that concerned you. Remember?

4 A. Yeah.

5 Q. At the top, "billed to." Can you read that for us?

6 A. "Youth Inventors Lab."

7 Q. Is that one of the sites you remember submitting those
8 big sorts of claims?

9 A. Yeah. I didn't work with that site directly.

10 Q. Got it. But these were the types of invoices that were
11 large and concerned you; is that right?

12 A. Yeah.

13 Q. Let me ask you about the claims. I know your job wasn't
14 entering claims; is that right?

15 A. Yeah.

16 Q. But while you worked at Feeding Our Future, did you ever
17 see the claims that the sites were submitting?

18 A. Sometimes. Not all the time.

19 Q. When you did see them, did anything about them ever
20 concern you?

21 A. Not at the time. They were just a lot of numbers, and I
22 didn't really pay attention to them.

23 Q. How about the size of the claims being submitted? Do
24 you remember anything about that?

25 A. No, just big claims.

1 Q. Big claims?

2 A. Yeah.

3 Q. You ever been to a town in Minnesota called Willmar?

4 A. Yeah.

5 Q. How large is Willmar?

6 A. It's not big at all.

7 Q. Pretty small?

8 A. Yeah.

9 Q. Do you ever see any claims for a site operating in
10 Willmar while you were working at Feeding Our Future?

11 A. Yeah.

12 Q. I show you Government's G6, which is in evidence. So if
13 I zoom in, Ms. Alonso, on this claim here, here we've got
14 about 3,000 meals to kids a day being claimed.

15 And in the top left, you can see the site is
16 Stigma-Free, Willmar; is that right?

17 A. Yeah.

18 Q. Is this the kind of big claim you were thinking about?

19 A. No.

20 Q. What was?

21 A. Like 5,000 kids or more.

22 Q. Remind us how many people went to your high school in
23 Texas.

24 A. I don't know. Like maybe over 3,000.

25 Q. Over 3,000. So this Stigma-Free, Willmar is an example

1 of a claim that almost the whole population of your high
2 school is being fed every day; is that right?

3 A. Yeah.

4 Q. But you said you saw ones even bigger than that, right?

5 A. Sometimes.

6 Q. You said like 5,000 a day?

7 A. Sometimes, yeah.

8 Q. All right. So the point you've told us of entering all
9 of this information, the receipts, the menus, that was to
10 get the claims paid; is that right?

11 A. Yeah.

12 Q. Let me talk to you about payment a little bit. How did
13 the sites get paid by Feeding Our Future?

14 A. Checks.

15 Q. Like a paper check?

16 A. Yeah.

17 Q. You ever see checks given out at Feeding Our Future to
18 the sites?

19 A. Yeah.

20 Q. When would that happen?

21 A. Mostly Fridays.

22 Q. Fridays?

23 A. Yeah.

24 Q. Just about every Friday?

25 A. Yeah, mostly.

1 Q. Payday?

2 A. Yeah.

3 Q. When Feeding Our Future was giving out checks on Fridays
4 to its site operators, what would that look like? Help the
5 jury picture it.

6 A. A bunch of people coming in for checks.

7 Q. Like four people?

8 A. No. Maybe like 10, 15.

9 Q. All throughout the day?

10 A. Throughout the day a little bit more, but sometimes they
11 would just come in groups.

12 Q. When they came in groups, are we talking about a fair
13 number of people throughout the day from all of those sites
14 coming in?

15 A. Yeah.

16 Q. When those site operators would come to Feeding Our
17 Future to get paid, what sorts of cars were they coming in?

18 A. I mean, nice cars sometimes. I mean, if I was in my
19 office I could see, but if I was in the front I couldn't.

20 Q. On those occasions you could see the cars, you said nice
21 cars?

22 A. Yeah.

23 Q. What do you mean by "nice cars"?

24 A. I mean nobody ever had an ugly car.

25 Q. None of the folks coming go in to get checks had an ugly

1 car?

2 A. No.

3 Q. Did they have beat up road cars?

4 A. No, as far as I know.

5 Q. Did they have nice ones?

6 A. Yeah.

7 Q. When this Friday payday came around, was Aimee Bock in
8 the office?

9 A. For the most part.

10 Q. Who was signing all the checks?

11 A. I believe she would sign them in the morning and then
12 hand them to the front to be given out.

13 Q. She would come in, sign them in the morning on Fridays?

14 A. Yeah, or maybe the day before.

15 Q. Was Aimee Bock aware, if you know, of all the nice cars
16 all the site operators were showing up in to Feeding Our
17 Future to get checks?

18 MR. UDOIBOK: Objection. Calls for speculation.

19 THE COURT: Overruled. The question is do you
20 know.

21 THE WITNESS: I'm not sure.

22 BY MR. BOBIER:

23 Q. Do you know if she had a window in her office?

24 A. Yeah.

25 Q. What did the window look out over?

1 A. The parking lot.

2 Q. Speaking of what Aimee knew in the office, was there a
3 camera in the office?

4 A. Yeah.

5 Q. Tell us about the camera.

6 A. It's in the front. I mean, there's two cameras, I
7 believe.

8 Q. And who is able to review the footage on the camera?

9 A. As far as I know only Aimee.

10 Q. Only Aimee?

11 A. Yeah.

12 Q. The boss?

13 A. Yeah.

14 Q. Is that like a live footage thing?

15 A. Yeah, I believe so.

16 Q. She would have that up in her office; is that right?

17 A. Yeah, on her computer, I believe.

18 Q. All right. You've told us about payments. Let me ask
19 you a little bit, Ms. Alonso, about how money was spent.

20 Okay?

21 A. Okay.

22 Q. Let me show you what's in evidence as Government's AA1.
23 All right. Ms. Alonso, these are some photos taken during
24 the execution of a search warrant at the Feeding Our Future
25 office.

1 Do you recognize what we're looking at here?

2 A. The art?

3 Q. Yeah. Is this a picture in the office of Feeding Our
4 Future?

5 A. Yeah.

6 Q. Let me zoom in. You said some art. I've sort of zoomed
7 in on this wall painting in the back; is that right?

8 A. Yeah.

9 Q. What are we looking at?

10 A. Art, like a mural.

11 Q. Like a mural?

12 A. Yeah.

13 Q. That's a mural in Feeding Our Future?

14 A. Yeah.

15 Q. Do you know who painted that?

16 A. My sister-in-law.

17 Q. She painted the mural here in Government's AA1; is that
18 right?

19 A. Yeah.

20 Q. Who asked her to do that?

21 A. What do you mean?

22 Q. Well, who asked her to paint the mural in Feeding Our
23 Future?

24 A. I had mentioned the -- I mentioned to Aimee that my
25 sister-in-law did art and she was an artist, so if she ever

1 needed any art or anything, let me know.

2 Q. And as far as you know from this mural appearing on the
3 wall, did Aimee Bock follow up on that?

4 A. What do you mean?

5 Q. Did Aimee Bock pay, did you say, your sister-in-law?

6 A. Yeah.

7 Q. Did Aimee Bock pay your sister-in-law to paint the
8 mural?

9 A. Yes.

10 Q. How much did she pay her?

11 A. I don't know about this one, no.

12 Q. You don't know how much?

13 A. No, not this one.

14 Q. Was there another one she painted?

15 A. The one in the lobby.

16 Q. And how much was your sister-in-law paid to paint the
17 mural in the lobby?

18 A. A little over 10,000.

19 Q. Over \$10,000?

20 A. Yeah.

21 Q. At a nonprofit; is that right?

22 A. Yeah.

23 Q. Did your sister-in-law paint this second mural also?

24 A. Yeah.

25 Q. Was she paid to do that one?

1 A. Yeah.

2 Q. But you don't remember what additional she was paid for
3 this --

4 A. No.

5 Q. -- second mural, right?

6 A. No.

7 Q. Ms. Alonso, the jury's heard a lot in this case about
8 something called MDE, the Minnesota Department of Education.
9 Had you heard about them while you were working at Feeding
10 Our Future?

11 A. Yeah.

12 Q. I want to go to the time period the jury's heard a lot
13 about where there was some disagreements between Feeding Our
14 Future and MDE.

15 Do you remember that period in general?

16 A. Yeah.

17 Q. There was a time in fall of 2021 when there was a
18 request for documentation from MDE to Feeding Our Future; is
19 that true?

20 A. I don't think it was in the fall.

21 Q. When was it?

22 A. Spring, maybe.

23 Q. Of that year?

24 A. Yeah.

25 Q. What did MDE request from Feeding Our Future?

1 A. All the documents of every site.

2 Q. You say, "All the documents for every site"?

3 A. Yeah.

4 Q. All those kinds of documents we talked about before, the
5 menus, the invoices, the claims?

6 A. Yeah.

7 Q. Among other things?

8 A. Yeah.

9 Q. Why, if you know, did MDE ask for all the documents for
10 every site around spring of 2021?

11 MR. UDOIBOK: Objection. Calls for speculation.

12 THE COURT: Overruled. The question is do you
13 know.

14 THE WITNESS: As far as I know, because they were
15 concerned about how many kids we were feeding.

16 BY MR. BOBIER:

17 Q. Because MDE was concerned?

18 A. Yeah.

19 Q. So they wanted the documentation; is that right?

20 A. Yeah.

21 Q. To back up the proof?

22 A. Yeah.

23 Q. Was there a meeting at Feeding Our Future about all
24 these requests coming in from MDE?

25 A. Yeah.

1 Q. Was Aimee Bock at the meeting?

2 A. Yeah.

3 Q. What did she say at the meeting about MDE's request for
4 all of the documents from all of the sites?

5 A. We had to get all the paperwork.

6 Q. Had to get all the paperwork?

7 A. Yeah, or find it in the office.

8 Q. Or find it?

9 A. Yeah.

10 Q. Was the staff able to just open a filing cabinet and
11 pull out all of the documents that were requested?

12 A. Some of them.

13 Q. How about the rest?

14 A. No. We had to request them from the sites.

15 Q. Why didn't Feeding Our Future have all the documents
16 that MDE was asking for?

17 A. I mean, I don't know.

18 Q. Well, had they --

19 A. Some of them were misplaced. Some of them were in
20 emails, different things.

21 Q. Had all that paperwork been kept as it should have all
22 along?

23 A. Probably not.

24 Q. Probably not?

25 A. Yeah.

1 Q. You mentioned, for example, sometimes there would not be
2 a menu from a site.

3 A. Yeah.

4 Q. And you just, with the rest of the staff, entered
5 generic menus, right?

6 A. Yeah.

7 Q. So for those instances, there would not be a menu from
8 the site to pull out of the drawer when MDE came asking,
9 right?

10 A. Yeah.

11 Q. And you mentioned that sometimes there would be a really
12 big difference between the amount claimed on an invoice and
13 the much larger amount claimed on the claim itself, right?

14 A. Yeah.

15 Q. And that sometimes that gap wasn't satisfied with more
16 papers from the sites, right?

17 A. Yeah.

18 Q. So for those also Feeding Our Future wouldn't have the
19 paperwork that they needed to have waiting for them when MDE
20 asked; isn't that --

21 MR. UDOIBOK: Objection. Calls for speculation
22 again.

23 THE COURT: Overruled.

24 BY MR. BOBIER:

25 Q. Isn't that true?

1 A. Yeah. Sometimes they were misplaced.

2 Q. After this meeting when the instruction went out to find
3 all the paperwork, was there any need at Feeding Our Future
4 to find site monitoring paperwork?

5 A. Yeah.

6 Q. Like site visit paperwork maybe you called it?

7 A. Yeah.

8 Q. And what was the problem there? Why wasn't there site
9 monitoring paperwork available for staff to just pull out of
10 a drawer?

11 A. I don't know. Sometimes it wasn't there.

12 Q. You mentioned earlier that for a period in 2020 site
13 visits stopped altogether, right?

14 A. Yeah.

15 Q. I think you said they paused?

16 A. Yeah.

17 Q. So during that period, there wouldn't have been any site
18 visit paperwork created because there weren't any site
19 visits occurring; is that right?

20 A. Yeah.

21 Q. What did the staff do that you saw when there was this
22 need to fill up the site visit paperwork for MDE?

23 A. I don't know about everyone else, but one time somebody
24 was filling it out.

25 Q. You saw an MDE -- I'm sorry. You saw an FOF employee

1 filling out site visit paperwork?

2 A. Yeah.

3 Q. Tell us about that.

4 A. I just saw she was sitting down filling everything out.
5 She was filling it out.

6 Q. This was after the meeting when Aimee Bock instructed
7 everyone to find all of the paperwork for all of the claims
8 for all of the sites?

9 A. It was somewhere in between the time that we had to get
10 everything for MDE.

11 Q. And when you say "she," this employee that you had
12 worked with, was filling out site visits, paperwork, she was
13 doing that in the office?

14 A. Yeah.

15 Q. And were those reflecting visits she had actually done,
16 or were they just papers she was filling out in a stack?

17 A. I mean, I believe they were papers she was just filling
18 out. I don't know if she had went to them, yeah.

19 Q. But your understanding, she was just filling them out
20 right there next to you; is that right?

21 A. Yeah.

22 Q. So after you saw this employee just filling out staff
23 site visit paperwork, not for site visits that you
24 understood had occurred, did you take that stack of
25 documents and take it to Aimee Bock's office?

1 A. I don't remember.

2 Q. Don't remember if you took that to Aimee Bock?

3 A. No.

4 Q. Do you remember if she was aware of that stack of
5 paperwork? Did you talk to her about it?

6 A. I'm pretty sure, yeah.

7 Q. And do you remember what happened after you talked to
8 her about it?

9 A. I don't remember. Maybe they were just placed on the
10 desk. I don't know.

11 Q. The same place you'd put those huge invoices from S & S
12 Catering that had concerned you, on Aimee Bock's desk right?

13 A. Yeah.

14 Q. The same place you would put those receipts that didn't
15 match up with the claims, on Aimee Bock's desk, right?

16 A. Yeah.

17 Q. Ms. Alonso, at some point there was a lawsuit between
18 MDE and Feeding Our Future; is that right?

19 A. Yeah.

20 Q. Feeding Our Future sued MDE?

21 A. I think so, yeah.

22 Q. Okay. During the course of that litigation, was there a
23 rally that occurred at MDE?

24 A. Yeah.

25 Q. Like a protest?

1 A. Yeah.

2 Q. Whose idea was that, as far as you know?

3 A. I don't know. Aimee maybe.

4 Q. Was there a meeting at Feeding Our Future about that
5 exact plan, to go to MDE and have a rally?

6 A. I don't remember at that time. My grandpa had just
7 passed away, so I wasn't really going to work a lot.

8 Q. Are you aware that the protest at MDE actually took
9 place, though?

10 A. Yeah.

11 Q. Do you have an understanding of what sort of preparation
12 Feeding Our Future did for that rally?

13 A. No. I just know they got shirts.

14 Q. They got shirts?

15 A. Yeah.

16 Q. Describe the shirts.

17 A. They just said that Feeding Our Future feeds kids. MDE
18 doesn't.

19 Q. For the folks at the protest to wear?

20 A. Yeah.

21 Q. That's something Feeding Our Future put together?

22 A. Yeah.

23 Q. Who is the boss of Feeding Our Future, Ms. Alonso?

24 A. Aimee Bock.

25 Q. She's in charge?

1 A. Yeah.

2 Q. If you saw one of those T-shirts again, would you
3 recognize it?

4 A. Yeah.

5 MR. BOBIER: Your Honor, permission to approach
6 with a physical exhibit?

7 THE COURT: Permission granted.

8 BY MR. BOBIER:

9 Q. All right. Ms. Alonso, could you read the label on the
10 outside of that bag for me, please?

11 A. Government Exhibit AA5.

12 Q. Okay. And could you open that up and look at what's
13 inside.

14 A. Yeah, it's a shirt.

15 Q. Is that in substantially the same condition as the
16 shirts you are aware were worn by Feeding Our Future and
17 others at the rally at MDE?

18 A. I think so. I didn't get one. So I don't really
19 remember.

20 Q. But you've seen images of them; is that right?

21 A. Yeah.

22 Q. And you just described for everyone before, you were
23 holding up the words that were on it; is that right?

24 A. Yeah.

25 MR. BOBIER: Your Honor, the government would move

1 the admission of AA5.

2 THE COURT: Any objection?

3 MR. UDOIBOK: No objection.

4 MR. MONTEZ: No objection.

5 THE COURT: AA5 is admitted.

6 BY MR. BOBIER:

7 Q. Ms. Alonso, I'm sorry. Before you put that away, could
8 you take that shirt up and hold it up to the jury up high so
9 that they could see it, please?

10 A. (Complied).

11 Q. And while you are holding it up, I know it is printed on
12 both sides. Could you read it for them?

13 A. "FOF feeds our kids. MDE won't."

14 Q. Is that what you were talking about when you said
15 T-shirts were worn by the FOF employees and others --

16 A. Yeah.

17 Q. -- protesting MDE?

18 A. Yeah.

19 Q. Ms. Alonso, the jury's heard that at some point in that
20 dispute MDE stopped the payments in the food program.

21 A. Yeah.

22 Q. Do you remember that?

23 A. I do.

24 Q. Do you remember that that meant once the stop pay was
25 issued, no more money for the sites for that time?

1 A. Yeah.

2 Q. And the jury's heard that at some point later the stop
3 pay was lifted, the money could flow again; is that right?

4 A. Yeah.

5 Q. Was there a reaction at Feeding Our Future after the
6 stop pay was lifted and the money could flow again?

7 A. We were happy.

8 Q. You were happy?

9 A. Yeah.

10 Q. Was Aimee Bock happy?

11 A. I'm pretty sure.

12 Q. Was there a, some sort of celebration at Feeding Our
13 Future about this?

14 A. No, there wasn't a celebration.

15 Q. Let me ask you this: Did Feeding Our Future employees
16 get bonuses at that time?

17 A. Yeah.

18 Q. Were you one of them?

19 A. Yeah.

20 Q. How big was the bonus?

21 A. \$5,000.

22 Q. Single check?

23 A. Yeah.

24 Q. That's a pretty nice bonus.

25 A. Yeah.

- 1 Q. Ever gotten a bonus like that before?
- 2 A. No.
- 3 Q. At Shutterfly?
- 4 A. No.
- 5 Q. Your previous work?
- 6 A. No.
- 7 Q. And you weren't a manager at the time, right?
- 8 A. No.
- 9 Q. Now, you weren't a supervisor?
- 10 A. No.
- 11 Q. You were working in data entry, right?
- 12 A. Yeah.
- 13 Q. But you got a bonus check?
- 14 A. Yeah.
- 15 Q. And others got bonus checks too?
- 16 A. Yeah.
- 17 Q. These came from Aimee; is that right?
- 18 A. Yeah, I believe she gave them out. I wasn't there the
- 19 day they were given out.
- 20 Q. But you did get one?
- 21 A. Yeah.
- 22 Q. You took it?
- 23 A. Yeah.
- 24 Q. You glad to get it?
- 25 A. Yeah.

1 Q. Ms. Alonso, let me ask you about someone named Salim
2 Said. Do you know that name?

3 A. No.

4 Q. Do you know, we talked earlier about a site called
5 Safari; is that right?

6 A. Yeah.

7 Q. Do you know who ran Safari?

8 A. Blackie.

9 Q. You say Blackie?

10 A. Yeah.

11 Q. The jury's heard earlier that was a nickname for
12 Mr. Salim Said. Might not know him by that name.

13 What do you remember about Mr. Said being at
14 Feeding Our Future?

15 A. He was there often.

16 Q. He was there in person a lot?

17 A. Yeah.

18 Q. What was he doing while he was in Feeding Our Future?

19 A. I don't know. Sometimes talking to Aimee. Sometimes
20 talking to site support.

21 Q. Would he go to Aimee Bock's office?

22 A. Yeah.

23 Q. They talk back there?

24 A. Yeah, I think so.

25 Q. He go back there a lot?

1 A. Yeah.

2 Q. What was Safari, do you remember?

3 A. A restaurant. A site.

4 Q. Do you remember it being a very large site or a small
5 site?

6 A. A large site.

7 Q. Did Mr. Salim Said have other sites that you remember in
8 Feeding Our Future?

9 A. I think so.

10 Q. When he would come into Feeding Our Future, do you ever
11 remember him seeking payment for the claims from his sites?

12 A. I mean, we switched who would handle checks. There's
13 somebody new in the front every day, but, yeah, I do
14 remember sometimes him picking up checks.

15 Q. Sometimes he'd come in to pick up the payment?

16 A. Yeah.

17 Q. And just to be clear, sometimes the person at the desk
18 handing out the checks, sometimes that was you, right?

19 A. Yeah.

20 Q. Okay. Do you remember when Salim Said would come in him
21 talking about anything besides the payments?

22 A. Either turning his stuff in. Sometimes talking about
23 the restaurant. His car, just different things.

24 Q. His car?

25 A. Yeah.

1 Q. What would he say about his car?

2 A. He has a nice car.

3 Q. You ever see it?

4 A. Yeah.

5 Q. Fancy?

6 A. Yeah.

7 Q. When he was there, Salim Said ever talk at Feeding Our
8 Future about his house?

9 A. I remember one time we -- yeah, we were talking about
10 it.

11 Q. What did he say about his house?

12 A. I just remember something about a basketball, basketball
13 court.

14 Q. Basketball in the house?

15 A. Yeah.

16 Q. A court?

17 A. Yeah.

18 Q. Sounds like a pretty big house.

19 A. Yeah.

20 Q. Ms. Alonso, when you introduced yourself to the jury,
21 you explained that your mom worked at Feeding Our Future
22 also, right?

23 A. Yeah.

24 Q. Her name was Norma Cabadas?

25 A. Now it is, yeah.

1 Q. Now it is.

2 A. Yeah.

3 Q. What did she go by before?

4 A. Norma Alonso.

5 Q. Which is your last name?

6 A. Yeah.

7 Q. When did your mom start going by Norma Cabadas instead
8 of Norma Alonso?

9 A. Maybe 2021.

10 Q. Okay. When you were living in Texas, were you with your
11 mom?

12 A. Yeah.

13 Q. And that was when you were in high school before you
14 came back to Minnesota, before you started working at
15 Feeding Our Future?

16 A. Yeah.

17 Q. So at that time, your mom was still going by Norma
18 Alonso; is that right?

19 A. Yeah.

20 Q. Let me show you Government's A4, which is in evidence.

21 All right. Ms. Alonso, I know this isn't your
22 email, but you can see at the top here it's an email from
23 Aimee Bock at Feeding Our Future; is that right?

24 A. Yeah.

25 Q. Can you read us what the subject line is here?

1 A. "Loan."

2 Q. "Loan"? Okay. And you can see that Ms. Bock attached a
3 number of items. Do you see all these PDFs up here at the
4 top of the email?

5 A. Yeah.

6 Q. And we go down to a little bit lower in the email, you
7 see that one of the items being discussed --

8 MR. UDOIBOK: Objection. Hearsay.

9 THE COURT: Overruled.

10 BY MR. BOBIER:

11 Q. Do you see that one of the items being discussed is a
12 loan amount?

13 A. Yeah.

14 Q. For 9,000; is that right?

15 A. Yeah.

16 Q. Let me go down a few pages. You recognize the emblem at
17 the top of this, I take it?

18 A. Yeah.

19 Q. All right. So I'm showing you this letter, which is one
20 of the attachments to the email from Aimee Bock we just
21 reviewed. Now at the bottom here, it indicates that this is
22 from Norma Cabadas, right?

23 A. Yeah.

24 Q. And you said that today that's what your mom goes by.
25 That's her name now?

1 A. Yeah.

2 Q. All right. Let's see what's in this letter. This
3 letter is to Ms. Bock. Do you see that, "Dear Ms. Bock"?

4 A. Yeah.

5 MR. UDOIBOK: Objection. Hearsay.

6 THE COURT: Mr. Bobier.

7 MR. BOBIER: Your Honor, it's -- there is no truth
8 to the document. The testimony will reveal that.

9 MR. UDOIBOK: Your Honor, same objection.

10 MR. BOBIER: It's not offered for the truth.

11 THE COURT: I asked for his explanation. I'm
12 going to overrule the objection.

13 BY MR. BOBIER:

14 Q. Ms. Alonso, you see that this is to Ms. Bock at the top
15 here?

16 A. Yeah.

17 Q. And it says at the very beginning, "Following our recent
18 discussions, we are delighted to offer you the position of
19 executive director with Feeding Our Future."

20 Did I read that right?

21 A. Yeah.

22 Q. "Our organization is dedicated to increasing access to
23 the Child and Adult Care Food Program."

24 Do you see that?

25 A. Yeah.

1 Q. The third paragraph says, "We are confident you,"
2 Ms. Bock, the person who received this, "will find this new
3 opportunity both challenging and rewarding."

4 Do you see that?

5 A. Yeah.

6 Q. And at the bottom it says the title for Ms. Bock, it
7 says executive director; is that right?

8 A. Yeah.

9 Q. And her starting salary, according to this letter at
10 Feeding Our Future, \$85,000. Do you see that?

11 A. Yeah.

12 Q. So, Ms. Alonso, this letter, this is from
13 September 2018, right?

14 A. Yeah.

15 Q. Was your mom working at Feeding Our Future in
16 September 2018?

17 A. No.

18 Q. Was she living in Minnesota at the time?

19 A. No.

20 Q. She's living with you in Texas, right?

21 A. Yeah.

22 Q. And your mom in 2018, you've told us, she wasn't going
23 by Norma Cabadas, was she?

24 A. No.

25 Q. What was she going by?

1 A. Norma Alonso.

2 Q. Which is your last name?

3 A. Yeah.

4 Q. Ms. Alonso, do you have familiarity with what your mom's
5 signature looks like?

6 A. Yeah. That's not her signature.

7 Q. That's not her signature?

8 A. No.

9 Q. Doesn't look anything like that?

10 A. No.

11 Q. Was your mom in a position in September 2018 to offer to
12 Aimee Bock a job at Feeding Our Future?

13 A. No, my mom didn't have a job. We were living in poverty
14 in Texas at that time.

15 Q. Do you believe this letter came from your mom?

16 A. No.

17 Q. Is it real?

18 A. It's fake. It's fake.

19 Q. And to be clear, this letter that you are calling fake
20 with your mom's name on the bottom of it, this is the
21 attachment we just reviewed in this email. Who sent that
22 email?

23 A. Aimee Bock.

24 MR. BOBIER: Thank you. Nothing further, Your
25 Honor.

1 THE COURT: Mr. Udoibok, cross-examination.

2 CROSS-EXAMINATION

3 BY MR. UDOIBOK:

4 Q. Ms. Cabadas, my name is -- no, not Cabadas.

5 A. Alonso.

6 Q. Alonso. I'm sorry.

7 My name is Kenneth Udoibok, and I represent
8 Ms. Bock. I have a few questions for you, though, and I
9 want to start from exhibit that we were just reviewing. Is
10 that A? Was it A4, I believe, if I'm not mistaken?

11 Before today, have you ever seen this email?

12 A. No.

13 Q. All right. Now let's go I believe page 4.

14 Do you know at any time whether your mother was a
15 board member of Feeding Our Future?

16 A. She never was.

17 Q. I said do you know whether she was.

18 A. She wasn't.

19 Q. All right. In '19, '19 -- I mean 2018, were you living
20 with your mother?

21 A. Yes.

22 Q. And you said your mother was unemployed?

23 A. Yes.

24 Q. And were you with your mother 24/7?

25 A. I lived with her.

1 Q. All right. Do you know, did she ever have a
2 conversation in 2018 with Ms. Bock, do you know?

3 A. I don't know.

4 Q. You don't know. All right.

5 Do you, did you listen to all her phone calls?

6 A. No.

7 Q. All right. And who met Ms. Bock first?

8 A. My mom.

9 Q. Your mom. And do you know about when did your mom meet
10 with Ms. Bock?

11 A. I don't know. I think maybe 2014 or earlier.

12 Q. Earlier before 2018, correct?

13 A. Yeah.

14 Q. All right. Do you know where that meeting occurred?

15 A. At a child care center.

16 Q. Where was that child care center?

17 A. In Savage.

18 Q. In Savage. And do you know -- how would you
19 characterize the relationship between your mother and
20 Ms. Bock?

21 A. My mom loved her a lot.

22 Q. Oh, yeah. In 2014 and 2015, and would you consider them
23 friends?

24 A. Yeah.

25 Q. And because of your mother's relationship with Ms. Bock,

1 you were given a job, weren't you?

2 A. Yes.

3 Q. All right. Okay. You have been given a T-shirt, I
4 believe Exhibit AA5. Could you look at it again?

5 A. Okay.

6 Q. Isn't it true it was your mom who designed it?

7 A. Who?

8 Q. Your mother. Did your mother?

9 A. I don't remember.

10 Q. Okay. Does your mom do any designing?

11 A. No, no.

12 Q. But you have relative that do design work?

13 A. Oh, yeah, I do.

14 Q. If I told you it was your mom that designed that, would
15 you have any reason to say not?

16 MR. BOBIER: Objection. Foundation. She says she
17 doesn't know.

18 THE COURT: Overruled. You may answer if you can.

19 THE WITNESS: I don't know.

20 BY MR. UDOIBOK:

21 Q. You don't know. So now there was a stop pay by MDE.
22 And the stop pay was lifted, correct?

23 A. Yeah.

24 Q. And you testified that Ms. Bock was happy, correct?

25 A. I believe so.

1 Q. Were you happy also?

2 A. Yeah.

3 Q. All right. And as a result of that, Ms. Bock gave
4 employees \$5,000 bonus?

5 A. Yes.

6 Q. Because money had come in?

7 A. Yeah. Yeah.

8 Q. All right. And you were happy you got the money, right?

9 A. Yeah.

10 Q. All right. Now how was the 5,000 given to you?

11 A. A check.

12 Q. A check. It wasn't cash, was it?

13 A. No.

14 Q. And it was a Feeding Our Future check?

15 A. Yeah. I don't remember if it was coming from Feeding
16 Our Future directly or --

17 Q. Well, how were you paid?

18 A. Through a check.

19 Q. Okay. Did the check look like your, the normal check
20 that you receive?

21 A. It was paid through direct deposit. I'm not sure.

22 Q. Okay. But you got the extra --

23 A. Yeah.

24 Q. -- 5,000 just normal like you get your check?

25 A. Yeah.

1 Q. I want to talk about the litigation. Were you involved
2 in any way in drafting the lawsuit?

3 A. In what?

4 Q. In -- sorry. I'm using big words. Were you involved in
5 preparing for the lawsuit?

6 A. From MDE?

7 Q. Yeah. I mean, when Feeding Our Future sued MDE, were
8 you involved in --

9 A. Yes.

10 Q. -- preparing the lawsuit?

11 A. Yeah. No. I don't know.

12 Q. No? Did you ever meet with Feeding Our Future lawyer?

13 A. No.

14 Q. Did you ever -- do you know what a complaint is?

15 A. Yes.

16 Q. All right. Did you, were you involved in drafting the
17 complaint for the lawsuit?

18 A. No.

19 Q. All right. Did you read the complaint at all?

20 A. No.

21 Q. All right. So you don't know what went into the
22 lawsuit?

23 A. No.

24 Q. All right. And then regarding the protest, you
25 testified that you weren't there for the protest.

1 A. No.

2 Q. And you were gone. Was it maternity leave?

3 A. No, I just wasn't at work that day.

4 Q. Okay. You weren't at work.

5 So I want to talk a little bit about, about what
6 time were you working at Feeding Our Future.

7 A. June 2020 up until around December of 2021.

8 Q. And then this is during COVID, right?

9 A. Yeah.

10 Q. And were you aware whether the site coordinators
11 conducted remote site visit?

12 A. I don't know.

13 Q. Okay. So they would not do it -- where was your office,
14 in the front?

15 A. No. It was in the back.

16 Q. It was in the back. So did the site coordinators have
17 an office?

18 A. Yeah, they had their little cubicles in the front.

19 Q. Were you aware of any zoom meeting at Feeding Our
20 Future?

21 A. No.

22 Q. They had computers?

23 A. Yes, they had computers.

24 Q. And laptops?

25 A. Yes.

1 Q. And cell phones?

2 A. Yes.

3 Q. All right. Did the coordinators ever told you that they
4 conducted site visits?

5 A. No, no.

6 Q. They don't tell you because you were not involved in
7 their work, right?

8 A. Yeah. Not that I remember.

9 Q. So if you see a site coordinator filling out forms, you
10 just assume they was filling out forms for, claim forms,
11 right?

12 A. Yeah.

13 Q. And could it be that they're filling out forms of their
14 site, remote site visit?

15 A. I don't remember hearing about any remote visits.

16 Q. Well, I'm not talking about whether you heard about it,
17 but do you know whether or not site coordinators conducted
18 remote visits?

19 A. I don't know.

20 Q. Okay. Now, do you know how many times Feeding Our
21 Future was required to go to conduct a site visit?

22 A. I don't know.

23 Q. You don't know. So you don't know how many times site
24 visits were required and you don't know whether they
25 conducted remote visits.

1 A. No.

2 Q. By what I mean by "remote visit" is, on their desk doing
3 a zoom or phone call recording.

4 A. I don't know.

5 Q. Okay. I want to talk about, you were questioned here
6 about MDE and doing the disagreement with Feeding Our
7 Future. Do you remember that?

8 A. Yes.

9 Q. And then you testified that Ms. Bock in the spring of
10 2021 wanted all the sites to gather documents, right?

11 A. Yes, yeah.

12 Q. And any missing documents, they were asking the sites to
13 bring documents because MDE wanted them.

14 A. Yes.

15 Q. All right. And those documents were brought to Feeding
16 Our Future, correct?

17 A. Yeah.

18 Q. And do you recall whether there was any, were there
19 boxes of documents at Feeding Our Future?

20 A. Yes, there was.

21 Q. All right. It is in testimony here from law enforcement
22 that there are about 270 boxes.

23 A. Yeah.

24 Q. Are those, those boxes contain documents that you gather
25 from the site?

1 A. Yes.

2 Q. Are you aware of any time that Feeding Our Future
3 invited MDE to come to Feeding Our Future to look at those
4 boxes?

5 A. I think I remember once.

6 Q. All right. And who, tell me what you remember about
7 that.

8 A. I don't remember much. I just remember the, there was a
9 comment that MDE was invited to the office.

10 Q. All right. Who, who told you that, who made that
11 comment? Do you remember who made it?

12 A. Aimee.

13 Q. All right. So I want to talk about -- did you have a
14 sister-in-law?

15 A. Yes.

16 Q. That work at Feeding Our Future?

17 A. No, she didn't work at Feeding Our Future. She did art.

18 Q. She did art.

19 A. Yeah.

20 Q. Was it you or your mom that introduce your sister-in-law
21 to Feeding Our Future?

22 A. It was me.

23 Q. You. Is she a good artist?

24 A. Yeah.

25 Q. And you like your sister-in-law?

1 A. Yeah.

2 Q. All right. And she painted those murals that we saw in
3 Exhibit AA1?

4 A. Yeah.

5 Q. It's nice, isn't it?

6 A. Yeah.

7 Q. All right. And did Ms. Bock ever tell you that she
8 liked the mural?

9 A. She loved them, yeah.

10 Q. She loved it. And do you know how Ms. Bock paid your
11 sister-in-law? Was it cash or check?

12 A. Check.

13 Q. Do you know whether it was a Feeding Our Future check?

14 A. I don't know if it was from Aimee or from Feeding Our
15 Future.

16 Q. All right. Ms. Mallet, would you call up Exhibit AA1.

17 MS. MALLET: What was the number?

18 MR. UDOIBOK: One. AA1. Sorry.

19 BY MR. UDOIBOK:

20 Q. So you testified to this. Let's just scroll through.
21 Go to the second page, just lift it through.

22 I want to, I wanted to show me about where your
23 office is from this perspective.

24 Is this the front of Feeding Our Future?

25 A. Yeah.

1 Q. Go to the next page.

2 A. What was that?

3 Q. Oh, so this is page 3.

4 Around where would the checks be located, if you
5 can tell from --

6 A. You can't see it from here.

7 Q. Can't see. Is this where we're looking at the desk here
8 with that monitor, is that the front desk also?

9 A. I don't remember. That's -- I don't know what that
10 computer is for.

11 Q. It's been a while since you've been at Feeding Our
12 Future.

13 A. Yeah.

14 Q. Go to the next page.

15 Is that considered the front desk?

16 A. Yeah.

17 Q. And would that be where you would, you would have sat?

18 A. Yeah, when it was my turn.

19 Q. When you were what?

20 A. When it was my turn, yes.

21 Q. Okay. So you took turns in doing front desk job and
22 also doing data entry.

23 A. Yes.

24 Q. All right. Let's go through it a little bit further.

25 And what door is that?

1 A. That's the entrance to the --

2 Q. That's the entrance. And then that's the first, the
3 first mural?

4 A. Yeah, that was my office.

5 Q. That was your office behind the mural?

6 A. Yes.

7 Q. Okay. And you have those blinds?

8 A. Yes.

9 Q. Now where would Ms. Bock office be?

10 A. To the left at the end.

11 Q. How far? How many offices to the end?

12 A. From me?

13 Q. From this door.

14 A. That? I don't know. Like three, maybe.

15 Q. Three offices. And do you always have your blinds like
16 that?

17 A. Yeah.

18 Q. All right. And you have another window in the back?

19 A. Yes.

20 Q. And you can see the parking lot?

21 A. Yes.

22 Q. To your west, your right, is there a wall or a window?

23 A. Wall.

24 Q. A wall. And you can't see through that wall? I hope
25 not.

1 A. No.

2 Q. All right. So if someone comes through this door and
3 goes to Ms. Bock's office, you cannot see through Ms. Bock's
4 office, can you?

5 A. No.

6 Q. Okay. Now, do you know where about the camera was
7 located from this perspective?

8 A. To the right.

9 Q. Go back. Ms. Mallet, go to the second page.

10 All right. So can you tell where the camera would
11 have been located?

12 A. Not from here, no.

13 Q. All right. Let's go to the third page.

14 Can you tell?

15 A. No.

16 Q. Let's go to the fourth. Fourth.

17 Can you tell where the camera would have been
18 located?

19 A. Yeah, right in the corner.

20 Q. Excuse me?

21 A. In the corner.

22 Q. Oh, is that the little --

23 A. Yeah.

24 Q. -- thing that -- all right. And how many people can
25 watch the front desk from there, do you know?

1 A. I think just Aimee.

2 Q. Just Aimee. And did you talk to Aimee why she has the
3 camera in the front desk?

4 A. No, I don't know.

5 Q. But you believe it was just for security, right?

6 A. Yeah.

7 Q. All right. Because is it fair, do you know, whether
8 Ms. Bock screened her visitors?

9 A. No, I don't know.

10 Q. Anyone can just walk in and talk to Ms. Bock?

11 A. No.

12 Q. All right.

13 A. No.

14 Q. They have to talk to the front desk first?

15 A. Yeah.

16 Q. And have permission to go back and talk to Ms. Bock?

17 A. Yeah.

18 Q. All right. So I want to talk about checks. When the
19 sites come to Feeding Our Future to pick up checks, were the
20 checks in an envelope, or were they just out there for
21 anyone to see?

22 A. Most of the time they were in an envelope.

23 Q. Okay. So you would not know the amount on the check?

24 A. No.

25 Q. So when you were working at the front desk handing out

1 checks, except you open the check and see inside, you
2 wouldn't know what the amount would have been?

3 A. No.

4 Q. Ms. Mallet, would you pull up G6.

5 I believe you testified about this email, G6.
6 Call out that email.

7 Before today, have you seen that email?

8 A. The claims at Feeding Our Future?

9 Q. No. Before today, have you seen Exhibit 6 from
10 Abdikadir Mohamud to Abdikerm Eidleh?

11 A. No.

12 Q. You hadn't seen it?

13 A. No.

14 Q. All right. So let's go to the second page.

15 And call out the meal count.

16 And when you testified today, you were just
17 testifying based on what you just saw. It's not like you
18 had reviewed this exhibit before today, correct?

19 A. No.

20 Q. Yeah. You hadn't seen this before?

21 A. I saw it at the office, yes, but --

22 Q. But have you seen this particular --

23 A. No.

24 Q. -- exhibit? No. All right. Thank you.

25 I want to talk to you about Monday.com. How many

1 people at Feeding Our Future had access to Monday.com?

2 A. A lot of people. I don't remember exactly how many.

3 Q. And so I believe you testified that when you, when you
4 input anything into Monday.com, it would have your, is it
5 signature or initials? What is it?

6 A. You can just see who viewed it based on the initials.

7 Q. All right. Who viewed the Monday.com?

8 A. Everybody, yeah.

9 Q. So how do you know, how would you know who viewed it?

10 A. Because it shows little bubbles with the initials.

11 Q. Bubbles and initials. And can you go back in time to
12 look at a particular day how many people logged on to
13 Monday.com?

14 A. I don't know.

15 Q. Okay. Did you, did you have access to Monday.com?

16 A. Yes, I did.

17 Q. For how long did you have access?

18 A. The whole time I was there, maybe.

19 Q. So were there, could anyone change Monday.com?

20 A. No.

21 Q. If you viewed, if you viewed Monday.com, can you hide
22 the fact that you viewed it?

23 A. No.

24 Q. No. So any time you viewed Monday.com, your, your --
25 that bubble will show, right?

1 A. Yes.

2 Q. And did all of the employees have access to Monday.com?

3 A. As far as I know, yeah.

4 Q. All of them. So is it fair to say that Monday.com was
5 the one place that you go to to see what was going on in a
6 particular claim, correct?

7 A. Correct.

8 Q. All right. Did the site, the owners, the site
9 managers -- no. Let me strike that.

10 Did the vendors have access to Monday.com?

11 A. I don't remember.

12 Q. Okay. But at least you know that in Monday.com you will
13 see mostly Feeding Our Future employees?

14 A. Yes.

15 Q. All right. And is your testimony that you believe
16 Ms. Bock had access to Monday.com too?

17 A. Yes.

18 Q. You saw, to use your word, her bubble?

19 A. Yeah.

20 Q. In Monday.com?

21 A. Yeah.

22 Q. All right. And so just walk the jury through what goes
23 on in Monday.com. Taking a particular site, if there's
24 receipt missing, you put that notation in Monday.com, right,
25 that something is missing in the claim?

1 A. Yeah.

2 Q. All right. And before the claim will go to CenterPilot,
3 you want to, you want to resolve what is missing on
4 Monday.com, right?

5 A. Yeah.

6 Q. All right. So now how many people, if you know, while
7 you are there at Feeding Our Future, have access to
8 CenterPilot?

9 A. Just the employees, I think. No. I think the sites had
10 access to it, maybe.

11 Q. The sites have access to CenterPilot?

12 A. I don't know, I can't say. I don't know.

13 Q. Did you work in CenterPilot?

14 A. Yes, I did.

15 Q. All right. So you don't show -- you don't know whether
16 sites will come in and change CenterPilot?

17 A. No. I think they only put their claims through
18 CenterPilot sometimes.

19 Q. They put their claims to CenterPilot?

20 A. Sometimes, yeah.

21 Q. So what happens in CenterPilot? What's, what happens in
22 CenterPilot?

23 A. You submit everything given by the sites.

24 Q. All right. So in CenterPilot you take all the receipts,
25 right?

1 A. Yeah.

2 Q. And all the meal counts, right?

3 A. Yeah.

4 Q. And you put it in CenterPilot?

5 A. Yeah.

6 Q. And it will be CenterPilot where the total amount will
7 be performed?

8 A. Yes.

9 Q. Okay. And if something is missing, then Ms. Bock would
10 figure that out when the claim goes to CLiCS, correct?

11 MR. BOBIER: Objection. Misstates the testimony,
12 Your Honor.

13 THE COURT: Overruled.

14 You may answer.

15 THE WITNESS: I don't remember.

16 BY MR. UDOIBOK:

17 Q. All right. Did you ever work in CLiCS?

18 A. I don't know.

19 Q. Okay. You don't know what CLiCS is. That's fine.

20 A. Yeah. I don't know.

21 Q. Okay. But was there CLiCS at Feeding Our Future?

22 A. The little silver things to click on people. I don't
23 know.

24 Q. Okay. You don't know. All right.

25 So basically I believe you testified that part of

1 your job was to input data?

2 A. Yes.

3 Q. Into, is it Monday?

4 A. Monday or CenterPilot.

5 Q. Monday or CenterPilot. And you testified that there
6 were, there's another category that you call other, correct?

7 A. Yes.

8 Q. All right. And that "other" was anything you cannot
9 find in the drop-down menu?

10 A. No. It's anything that's not food items.

11 Q. Anything that is not food items, you put it in the
12 "other" category?

13 A. Yes.

14 Q. All right. And the reason you put it in other category
15 is because you want the claims department to know that this
16 is the "other," right?

17 A. Yeah.

18 Q. Was it your job to approve or deny receipts?

19 A. No.

20 Q. No. No. So you want to put everything that, your job
21 is to make sure you put everything down, whether it is good
22 or bad, put it down in the right category, correct?

23 A. Yeah.

24 Q. And then were people called claims administrators at
25 Feeding Our Future?

1 A. Claim administrator, yeah, there was.

2 Q. Okay. How many people were those?

3 A. I don't remember.

4 Q. All right. But those claim administrators are different
5 from you inputting the data into Monday or CenterPilot?

6 A. Yeah, we have different jobs.

7 Q. You have different job. And those claims administrators
8 are going to be the ones flagging this "other," correct?

9 A. Yeah.

10 Q. Okay. Did you get the impression that you had the
11 authority to say, oh, cancel a receipt? Could you do that?

12 A. No. I have to enter everything that's given.

13 Q. You enter everything.

14 A. Yes.

15 Q. And you did. I heard you did a good job.

16 A. Yeah. I tried.

17 Q. So I think you testified that you had some concerns
18 about some receipts, right?

19 A. Yeah.

20 Q. And then you put it on top of Ms. Bock's office, right?

21 A. Sometimes.

22 Q. Sometimes. And then the claims would be paid, right?

23 A. Yes, as far as I know.

24 Q. But you don't know whether Ms. Bock clarified whatever
25 problem you raised. Do you know that?

1 A. I don't know.

2 Q. Okay. When people -- you testified that Ms. Bock would
3 meet with some of the site in her office. You didn't know
4 what the conversation was, though?

5 A. No.

6 Q. So other than Ms. Bock at Feeding Our Future, there were
7 other managers, right?

8 A. Yes.

9 Q. Who were those?

10 A. Coley and my mom.

11 Q. All right.

12 A. And Hadith.

13 Q. Yes. And you considered them your supervisor, correct?

14 A. Yeah.

15 Q. All right. And if you have any problem, you would talk
16 to Coley or Hadith, right?

17 A. Yes.

18 Q. It is only when Hadith does not or Coley does not
19 satisfy your -- what your complaint would be about, you
20 would go to Ms. Bock, correct?

21 A. Yes.

22 Q. All right. And why don't you tell Ms. Bock as far as
23 you are concerned, you done your job, right?

24 A. Yeah.

25 Q. Okay. It's her job to resolve the problem, right?

1 A. Yeah.

2 Q. Okay. I wasn't quite sure about your testimony about
3 generic menu. I want some -- help me to understand that.

4 And I believe you testified also that there was
5 some sites that provided food that were not on the
6 Monday.com drop-down menu, correct?

7 A. CenterPilot, yeah.

8 Q. CenterPilot. But you are not saying that that food is
9 not authorized though. You are not saying that. It's just
10 that it's not on your menu, right?

11 A. No.

12 Q. So that's why you have a category at Feeding Our Future
13 for generic, right?

14 A. Sometimes, yeah.

15 Q. Okay. And there was some Somalian food that was not in
16 the drop-down menu, right?

17 A. Yeah.

18 Q. And you've seen that some of the site have provided East
19 African foods that are not in CenterPilot.

20 A. Yes, sometimes.

21 Q. All right. Now, I believe you testified that, you know,
22 you thought the meal counts were, were large, right?

23 A. Yeah.

24 Q. But you don't have any independent knowledge as to why
25 it was large or small, right?

1 A. No.

2 Q. When Feeding Our Future has a contract with a site, they
3 don't invite you to that meeting, do they?

4 A. No.

5 Q. All right. It's just that it was just large.

6 A. Yeah.

7 Q. Okay. And you don't know why it's large or not.

8 A. No.

9 Q. I believe you testified that sometime, is it 2020 you
10 had visited Safari Restaurant, right?

11 A. Yeah.

12 Q. That's the only site visit?

13 A. Yeah.

14 Q. Okay. And was that for training, just to see what a
15 site does?

16 A. Yeah, we had just started, so we were seeing what Safari
17 was doing.

18 Q. All right.

19 MR. UDOIBOK: I don't have any further questions.

20 THE COURT: Thank you.

21 Mr. Montez.

22 MR. MONTEZ: Thank you.

23 CROSS-EXAMINATION

24 BY MR. MONTEZ:

25 Q. Good afternoon, Ms. Alonso.

1 A. Good afternoon.

2 Q. My name is Adrian Montez. I represent Salim Said.

3 And a perfect transition here into this, questions
4 I want to ask you here. You started working for Feeding Our
5 Future in June 2020; is that right?

6 A. Yeah.

7 Q. And shortly after you got hired on with Feeding Our
8 Future, you did a site visit; is that correct?

9 A. Yeah.

10 Q. Now doing site visits, that wasn't part of your job.
11 Your job was data entry, correct?

12 A. Yes.

13 Q. But you did go to Safari Restaurant to kind of see how
14 everything worked out; is that true?

15 A. Correct.

16 Q. And while you were there, you saw that food was being
17 set out, correct?

18 A. Yeah.

19 Q. You saw that there were cars that were pulling up; is
20 that correct?

21 A. Yes.

22 Q. You described it as a, there was a lot of people there;
23 is that correct?

24 A. Yeah, a lot of employees.

25 Q. Okay. And a lot of other people coming to get food too;

1 is that true?

2 A. Yeah.

3 Q. I think you testified on direct examination that you
4 were there for less than an hour; is that right?

5 A. About.

6 Q. And you saw about 10 to 15 cars you estimated pull up to
7 get food?

8 A. Yes.

9 Q. Did you see containers going out to the food -- I'm
10 sorry -- containers going out to the cars?

11 A. Yeah, boxes of food.

12 Q. Boxes of food? Did you have any idea how much food was
13 in the boxes?

14 A. No.

15 Q. How much food was in the containers?

16 A. No.

17 Q. Okay. And are you aware if there were any other
18 deliveries or anything like that going on? Are you aware of
19 any of that?

20 A. Not that I was aware of no.

21 Q. Okay. But it's possible that was happening; is that
22 true?

23 A. I'm not sure.

24 Q. All right.

25 MR. MONTEZ: Thank you. No further questions.

1 THE COURT: Mr. Bobier.

2 MR. BOBIER: Briefly, Your Honor. Thank you.

3 REDIRECT EXAMINATION

4 BY MR. BOBIER:

5 Q. How are you holding up, Ms. Alonso?

6 A. Good.

7 Q. Weird afternoon.

8 A. Yeah.

9 Q. You are almost done, I promise.

10 A. Okay.

11 Q. Ms. Alonso, are you happy to be here testifying in a
12 federal courtroom today?

13 A. No.

14 Q. Not very fun?

15 A. No.

16 Q. A bunch of lawyers ask you questions about things that
17 happened a few years ago.

18 A. Yeah.

19 Q. A bunch of folks stare at you.

20 A. Yeah.

21 Q. We're almost done.

22 A. Okay.

23 Q. How old were you when you worked at Feeding Our Future?

24 A. I was 19.

25 Q. 19?

1 A. Yeah.

2 Q. Other than your work at Shutterfly, your first job; is
3 that right?

4 A. Yeah.

5 Q. When counsel for Ms. Bock was up here a minute ago, he
6 said if there was a problem at Feeding Our Future it was
7 Aimee Bock's job to resolve it.

8 A. Yes.

9 Q. I wrote that down. I remember him saying it.

10 Do you remember him asking you that?

11 A. Yeah.

12 Q. Do you think you agree with him if there's a problem at
13 Feeding Our Future, it's Aimee Bock's job to resolve it; is
14 that right?

15 A. Yeah.

16 Q. Why is it her job?

17 A. She's the boss.

18 Q. She's in charge?

19 A. Yeah.

20 Q. You were asked if you approved claims, but that's not
21 your job, right?

22 A. No.

23 Q. Who approves the claims?

24 A. Claims department or Aimee.

25 Q. Who signs the checks?

1 A. Aimee.

2 Q. Who has final sign-off on the money going out the door
3 at Feeding Our Future?

4 A. Aimee.

5 Q. Is she who interviewed you for the job?

6 A. Yeah.

7 Q. Is she who hired you?

8 A. Yes.

9 Q. Is she who ran the place?

10 A. Yes.

11 Q. You were also asked a little bit about the relationship
12 between your mom and Aimee Bock. Do you remember that?

13 A. Yeah.

14 Q. And you said that your mom and Aimee used to be friends,
15 right?

16 A. Yeah.

17 Q. You told us on direct that back in the day they worked
18 in child care together?

19 A. Yes.

20 Q. They'd known each other a while?

21 A. Yeah.

22 Q. For a while they were really good friends; isn't that
23 true?

24 A. Yeah.

25 Q. Aimee hired her, right?

1 A. Yeah.

2 Q. She hired you?

3 A. Yeah.

4 Q. Are they still friends?

5 A. They don't talk.

6 Q. They don't talk anymore, do they?

7 A. No.

8 Q. Why not?

9 A. Because they stopped talking when my mom left Feeding
10 Our Future.

11 Q. Your mom got hired by Aimee Bock, but she didn't stay
12 working with her, did she?

13 A. No.

14 Q. She left.

15 A. Yeah.

16 Q. Why did your mom leave Feeding Our Future?

17 A. Because she felt like it wasn't her place to be there
18 anymore.

19 Q. What made her feel like it wasn't here place to be there
20 anymore?

21 A. There was an employee that she couldn't see face-to-face
22 with, I guess.

23 Q. And did your mom have some concerns about Feeding Our
24 Future?

25 MR. UDOIBOK: Objection. Leading.

1 THE COURT: Overruled.

2 THE WITNESS: Yes, she did.

3 BY MR. BOBIER:

4 Q. What set off her concerns?

5 A. That somebody had approached her with some information,
6 and she went to Aimee, and Aimee told the person.

7 Q. What information did your mom hear that she then took
8 right to Aimee Bock that concerned her?

9 A. I'm not exactly sure, but it was something about being
10 paid to have sites enter the program.

11 Q. Getting paid in order to have a site at Feeding Our
12 Future?

13 A. Somebody had told my mom something like that, yeah.

14 Q. So your mom hears this, and she goes right to Aimee Bock
15 with it.

16 A. Yeah.

17 Q. Her friend, right?

18 A. Yeah.

19 Q. The person who hired her and hired you?

20 A. Yeah.

21 Q. So your mom takes what she's heard about people paying
22 to get a site under Feeding Our Future to Aimee Bock. What
23 happens after that?

24 A. I guess Aimee told the person, and the person went into
25 my mom's office yelling at her about it.

1 Q. Who is this person you are talking about?

2 A. Ikram Mohamed.

3 Q. That was someone else at Feeding Our Future?

4 A. The -- I don't know what her role is, honestly.

5 Q. But you knew her from around Feeding Our Future; is that
6 fair?

7 A. Yes.

8 Q. So what altercation happened between Ikram Mohamed and
9 your mom?

10 MR. UDOIBOK: Objection. Leading. Altercation.

11 THE COURT: Sustained. Rephrase.

12 BY MR. BOBIER:

13 Q. Can you describe what happened, as far as you know it,
14 after your mom raised this concern to Aimee Bock?

15 A. Ikram walked into my mom's office yelling at her,
16 stating that it wasn't true.

17 Q. And your mom who had been friends with Aimee Bock, how
18 did she react?

19 A. She felt like it was a slap in the face.

20 Q. Why?

21 A. Because she trusted Aimee with the information she gave
22 her.

23 Q. She trusted Aimee, right?

24 A. Yeah.

25 Q. She trusted her friend with this concerning thing that

1 she'd heard; is that right?

2 A. Yeah.

3 Q. And then what happened to your mom?

4 A. She left.

5 Q. Aimee didn't keep her around at Feeding Our Future, her
6 friend?

7 A. My mom chose to leave.

8 Q. Why did your mom choose to leave, as far as you know?

9 A. Because she felt like she had nothing to do there
10 anymore since she was disrespected.

11 Q. Disrespected. Place for her concerns brought to Aimee
12 Bock not --

13 A. Yeah.

14 Q. -- not being addressed?

15 A. Yes.

16 Q. So your mom left.

17 A. Yes.

18 Q. And then you left.

19 A. Yeah.

20 Q. Ms. Alonso, why did you leave Feeding Our Future?

21 A. Because -- well, after my mom left, I felt like I
22 wasn't, I wasn't, I guess welcome. I mean, it just started
23 being weird.

24 Q. Weird how?

25 A. I knew my mom wasn't there anymore, so I felt I guess

1 alone, and it was time for me to leave.

2 Q. Didn't feel like a safe workplace?

3 A. Not necessary --

4 MR. UDOIBOK: Objection. Leading.

5 THE COURT: Sustained. The answer will be
6 stricken.

7 BY MR. BOBIER:

8 Q. You left Feeding Our Future. When was that?

9 A. December of 2021.

10 Q. December 2021 your mom has left, right?

11 A. Yeah, she had already been gone.

12 Q. And then you leave.

13 A. Yeah.

14 Q. Ms. Alonso, what happened a few weeks at Feeding Our
15 Future after you left?

16 A. They were raided by the FBI.

17 MR. BOBIER: Nothing further, Judge. Thank you.

18 THE COURT: Do you have a recross, Mr. Udoibok?

19 MR. UDOIBOK: Yes, Your Honor.

20 RECROSS-EXAMINATION

21 BY MR. UDOIBOK:

22 Q. Ms. Alonso, you love your mom.

23 A. Yeah, I love her.

24 Q. Love her very much.

25 A. Yeah.

1 Q. Is there any job that you sacrifice against your mom?

2 A. No.

3 Q. No. It's the right thing to do.

4 Do you know whether or not what your mom told
5 Ms. Bock and that Ms. Bock investigated it? Do you know?
6 Do you have any information?

7 A. No.

8 Q. No. It's just that what you know is what your mom told
9 you.

10 A. It's what we all saw, yeah.

11 Q. Yes. That do you know whether Ms. Bock confronted Ikram
12 Mohamed about the information that was provided?

13 A. I don't know.

14 Q. Okay. But all you know is Ikram Mohamed confronted your
15 mom.

16 A. Yeah.

17 Q. And did you witness it?

18 A. No.

19 Q. Okay. It's just what your mom told you?

20 A. We were all in the office, so we all heard it, yeah.

21 Q. Oh, you heard something?

22 A. Yeah. I mean, when my mom walked out, she was crying,
23 yeah.

24 Q. Okay. Your mom was crying?

25 A. Yeah.

1 Q. And did you see Ikram Mohamed?

2 A. Yes, I did.

3 Q. Was she crying also?

4 A. No.

5 Q. But was she upset?

6 A. She was loud.

7 Q. All right. Did you recall what she said?

8 A. No.

9 Q. All right. But she disagreed with your mom, right?

10 A. Yeah.

11 Q. But you don't know what your mom -- let me back up.

12 Do you know whether your mom accused Ikram Mohamed
13 of anything?

14 A. No.

15 Q. Okay. It's just that your mom weren't happy about it.

16 A. My mom was just voicing what was told to her to Aimee.

17 Q. Okay. So your mom was voicing what was told to her, and
18 Ms. Bock disclosed what your mom told her.

19 A. Yeah, right away.

20 Q. You have to -- yeah. And that caused some problems.

21 A. Yeah.

22 Q. All right. As a result your mom quit?

23 A. Yes.

24 Q. Did you at any time after your mom quit contact Ms. Bock
25 and said you would like to volunteer because you like kids?

1 A. Yeah.

2 Q. Okay.

3 MR. UDOIBOK: No further questions.

4 THE COURT: Mr. Montez?

5 Mr. Bobier?

6 MR. BOBIER: Nothing further.

7 THE COURT: You may step down.

8 THE WITNESS: Thank you.

9 THE COURT: Thank you.

10 We're going to take an afternoon break, and we'll
11 come --

12 Let me ask. Your next witness, long, short?

13 MR. JACOBS: I suspect it will take us through the
14 rest of the day.

15 THE COURT: Got it. We're going to come back at
16 3:30.

17 All rise for the jury.

18 (Recess taken at 3:00 p.m. till 3:34 p.m.)

19 3:34 p.m.

20 **IN OPEN COURT**

21 **(JURY PRESENT)**

22 THE COURT: You may all be seated.

23 And the government may call its next witness.

24 MR. JACOBS: Thank you, Your Honor. The

25 United States calls Special Agent Valerie Eastwood.

1 THE COURT: Good afternoon. You may come forward
2 to me. I'll have you stand before me to take the oath.

3 VALERIE EASTWOOD,
4 called on behalf of the government, was duly sworn, was
5 examined and testified as follows:

6 THE WITNESS: Yes, I do.

7 THE COURT: Thank you. You may be seated.

8 And when you are settled, please state and spell
9 both your first and last name for the record.

10 THE WITNESS: Okay. My name is Valerie Eastwood.
11 V-A-L-E-R-I-E. Last name E-A-S-T-W-O-O-D.

12 THE COURT: Thank you.

13 Mr. Jacobs, you may inquire.

14 MR. JACOBS: Thank you, Your Honor.

15 DIRECT EXAMINATION

16 BY MR. JACOBS:

17 Q. Good afternoon, Special Agent Eastwood.

18 A. Good afternoon.

19 Q. Where are you currently employed?

20 A. FBI Minneapolis.

21 Q. What is your position in the FBI?

22 A. I'm a special agent.

23 Q. Can you explain to the jury at a very high level what
24 you do as a special agent with the FBI?

25 A. I'm currently assigned counter terrorism matters at the

1 FBI. And I work sources, all kinds of counter terrorism
2 issues that are within our area of responsibility.

3 Q. And you are here today to testify about a search of a
4 particular residence; is that right?

5 A. Yes, I am.

6 Q. Okay. Before -- how long have you been with the FBI?

7 A. 13 years.

8 Q. And prior to working at the FBI, what did you do?

9 A. I worked for the U.S. Marshal Service.

10 Q. What did you do for the U.S. Marshals?

11 A. I was a criminal program specialist for the District of
12 Northern Georgia.

13 Q. Prior to the marshals, what did you do?

14 A. Prior to the marshals, I was active duty Air Force.

15 Q. And can you, again at a high level, tell the jury what
16 you did with the Air Force?

17 A. With the Air Force, I did two enlistments. My first one
18 I was a vehicle operator. My second one I was an arabic
19 linguist.

20 Q. An Arabic linguist?

21 A. Yes, sir.

22 Q. Fluent in Arabic?

23 A. At the time I would say I was.

24 Q. Any other languages?

25 A. No, sir.

1 Q. Now you've been at the FBI for 13 years. Can you tell
2 the jury a little bit about the type of training that you
3 receive as an FBI special agent?

4 A. Yes. As a special agent, I went through about six
5 months at the academy in Quantico, Virginia, where we
6 learned search techniques. We learned interview and
7 interrogation techniques, arrests.

8 We did a tactical section, firearms, that sort of
9 thing.

10 Q. And in the intervening 13 years, have you received
11 additional training with the FBI?

12 A. Yes, I have.

13 Q. Can you tell the jury a little bit about that?

14 A. As an agent I do mandatory quarterly firearms training
15 to keep up firearms skills, same with tactics. We do
16 searches regularly. I was also a member of the evidence
17 response team.

18 So I got additional search -- in evidence, search
19 and seizure training on that. Most of everything we do in
20 the academy we continue to train on, so we don't lose any of
21 those skills.

22 Q. You mentioned the evidence response team or ERT?

23 A. Yes.

24 Q. Can you tell the jury what the ERT does?

25 A. The evidence response team is made up of agents and

1 support personnel. They do, you know, they are not
2 certified in anything necessarily that regular agents are
3 not, but they take the time to learn how to really get into
4 the weeds when they're doing a search.

5 So we usually call out our evidence response team
6 when we have a search that contains a lot of documents or a
7 lot of digital items that need to be seized or something
8 that may take a long time and may need special attention
9 paid to it.

10 Q. So in your time as a special agent with the FBI, as well
11 as your time with the evidence response team, about how many
12 searches have you participated in?

13 A. I'm not sure I could even guess that. A lot.

14 Q. More than ten?

15 A. More than ten.

16 Q. More than 20 maybe?

17 A. Yes.

18 Q. Lots?

19 A. Lots, yes.

20 Q. And have those searches been of residences?

21 A. Residences, businesses, vehicles.

22 Q. You name it.

23 A. Yes.

24 Q. Okay. I want to turn your attention now to this
25 particular case.

1 A. Okay.

2 Q. What was your role in this investigation?

3 A. I was a searcher on the search team.

4 Q. You weren't part of the case team?

5 A. Correct. I was not.

6 Q. And not a case agent.

7 A. Correct.

8 Q. You just participated or assisted in one search.

9 A. That's correct.

10 Q. Okay. So I want to turn your attention now to January
11 of 2022. Did you participate in a search of a residence at
12 5150 Alvarado Lane in Plymouth, Minnesota?

13 A. Yes, I did.

14 Q. And can you tell the jury a little bit about your role
15 at that particular search?

16 A. At that particular search I was a searcher. So when we
17 got to the residence and we began our search, I was one of
18 the people that were going through the house looking for
19 things that were on the warrant for us to search.

20 Q. And can you tell the jury a little bit about different
21 roles that people have in executing a search warrant?

22 A. Yes. We have a photographer that goes around, takes
23 pictures of the rooms in the house before we start the
24 search and after the search to show the difference, make
25 sure everybody knows that we didn't disturb anything

1 unnecessarily.

2 They also take pictures of evidence before we
3 seize it. We have a photo -- so we have a photographer, and
4 then the person that writes down what each photo is so they
5 can go back then and see what they're looking at when
6 they're looking at each photo.

7 We have a sketch, sketcher, that goes around to
8 each room and sketches what they see. We have regular
9 searches or searchers, and we have an evidence custodian
10 that's responsible for taking all the evidence in, labeling
11 it properly and making sure it goes into the evidence room.

12 Q. Okay. So now turning specifically to the search of this
13 residence, was it the residence of Mr. Salim Said that you
14 searched on Alvarado Place?

15 A. Yes.

16 Q. Or Alvarado Lane?

17 A. Yes.

18 Q. Okay. And approximately when was that search?

19 A. What time of day?

20 Q. What time when -- what date was that search,
21 January 20th of 2022?

22 A. January 20th of 2022, yes.

23 Q. And what time of day did the search take place?

24 A. It was early in the morning. It wouldn't have been
25 before 6:00 a.m.

1 Q. And was this the same day that search warrants were
2 executed throughout the state of Minnesota relating to this
3 case?

4 A. Yes, it was.

5 Q. Prior to the search of this residence, did law
6 enforcement apply for court authorization to search and
7 seize evidence from that residence?

8 A. Yes, they did.

9 Q. A search warrant?

10 A. Yes.

11 Q. What types of evidence, at a high level, were you
12 authorized to seize that day?

13 A. We were looking for documents and digital devices.

14 Q. Can you tell the jury a little bit about how the search
15 unfolded that morning?

16 A. We got there in the morning. We went to the residence,
17 identified ourselves to the resident in there, showed them
18 the warrant, said that we had the right to come in and do
19 the warrant.

20 When we got in, like I had described before, we
21 had a photographer go in first, take photos of everything,
22 how it was. And then the search team followed, and we went
23 through, searching for the items that were in the warrant.

24 Q. And can you explain to the jury how you go through a
25 house like that to search for items that are relevant to the

1 warrant?

2 A. We basically go room by room. If it's a search like
3 this and we're looking for documents, then that means
4 opening up drawers and cupboards and closets and basically
5 looking anyplace where a piece of paper could be.

6 Digital devices, we look for same thing. Opening
7 up drawers and cupboards, looking for any kind of digital
8 device that may be on the warrant.

9 Q. And maybe it speaks for itself, but when you say a
10 "digital device," what do you mean?

11 A. Like a cell phone or a computer.

12 Q. Now, you mentioned two types of categories of documents,
13 digital devices and hard copy paper documents?

14 A. Yes.

15 Q. Did you recover and seize both type of documents during
16 this search?

17 A. Yes.

18 Q. And what happens after you seize those documents?

19 A. After we seize those documents, the evidence custodian
20 there at the search site logs everything. We label it. We
21 seal it up. We take it over to our office, and we have an
22 evidence room there. We submit it. Those are for
23 documents.

24 For digital devices, they start with the same sort
25 of process, but they also go to our evidence technicians who

1 are able to do an analysis on those devices and pull the
2 information off of them.

3 Q. I want to now show you what has been marked for
4 identification but not admitted yet as Government
5 Exhibit GG1.

6 Do you recognize GG1, and I will page through a
7 couple of the pages. Do you recognize this exhibit?

8 A. Yes, I do.

9 Q. And what is it?

10 A. Those are photographs of the residence.

11 MR. JACOBS: Your Honor, the government offers
12 GG1.

13 THE COURT: Any objection?

14 MR. UDOIBOK: No objection.

15 MR. MONTEZ: No objection.

16 THE COURT: GG1 is admitted.

17 BY MR. JACOBS:

18 Q. All right. Special Agent Eastwood, the Government
19 Exhibit GG1 is now on the scene in front of the jury. Can
20 you tell them what they're looking at in this first page?

21 A. This is the form that we fill out before we take any
22 pictures, and that's to identify the residence where we are.
23 Basically every photo at that follows in the camera roll
24 from this will then be aligned with this address and it will
25 let you know who the photographer is, case number and when

1 the search occurs.

2 Q. Okay. So date we see is January 20, 2022?

3 A. Mm-hmm.

4 Q. And location is 5150 Alvarado Lane?

5 A. Yes.

6 Q. All right. Moving down to page 2, can you tell the jury
7 what we're seeing?

8 A. This is the front of the residence.

9 Q. So let me take a step back. This search was of a
10 residence in Plymouth, Minnesota. Can you tell the jury
11 where Plymouth is?

12 A. Where Plymouth, Minnesota, is?

13 Q. Correct.

14 A. It's a suburb of Minneapolis. I would say it's west.

15 Q. About 20 minutes west of here?

16 A. About 20 minutes west, yes.

17 Q. So this is the outside of the house?

18 A. Yes.

19 Q. A different view of that same outside?

20 A. Yes.

21 Q. And going down to page 4 now, what are we looking at?

22 A. Front door of the residence.

23 Q. Okay. And now we're on page 5. Can you tell the jury a
24 little bit about the house and what we're seeing in page 5
25 of this photo?

1 A. This looks like the dining room.

2 Q. And moving on to page 6, more of the dining room?

3 A. Yes.

4 Q. Page 7.

5 A. More of the dining room.

6 Q. Page 8.

7 A. This looks, if I remember right, this was a nook kind of
8 when you came into the house off to the side. It looks like
9 they're using it as an office space.

10 Q. Okay. There's a computer on that table?

11 A. Yes.

12 Q. An example of the type of digital devices --

13 A. Yes.

14 Q. -- that you are searching in addition to the documents?

15 A. Mm-hmm, yes.

16 Q. Page 9. Can you orient the jury as to what they're
17 seeing in this photograph?

18 A. This is the first floor, kind of looking into living
19 area, and you can see the stairs leading up on the right.

20 Q. Living room area?

21 A. Yes.

22 Q. Same living room?

23 A. Yes.

24 Q. Now we're looking off into the kitchen. Can you tell
25 the jury about what we're seeing?

1 A. It looks like the photographer at this point is standing
2 in the living room area and looking toward the kitchen.

3 Q. And I'm going to go down to Exhibit 15. And what are we
4 seeing in -- or excuse me -- page 15 of Exhibit GG1. What
5 do we see in this picture?

6 A. That is the garage with two vehicles in it.

7 Q. Okay. What kind of -- can you make out what kind of
8 cars they are?

9 A. Mercedes SUV and a Z71 pickup truck.

10 Q. Okay. This is the pickup truck.

11 All right. Moving on to page 17, what is this?

12 A. That looks like the, a living area and that might be in
13 the basement. I do not recall exactly what level of the
14 house that was in.

15 Q. Kind of TV room?

16 A. Yes.

17 Q. Same room?

18 A. Yes.

19 Q. All right. Going down to page 19, is this, can you tell
20 the jury what we're seeing here?

21 A. It's looking out. The photographer is standing in a way
22 that they're looking toward the sport court that was in the
23 residence on the lower level.

24 Q. This looks like maybe a bar area of the basement?

25 A. Yes.

1 Q. And to the right there, you said there was a sport
2 court. Is this the sport court?

3 A. Yes, it is.

4 Q. Indoor basketball court?

5 A. Yes.

6 Q. And that was part of the basement?

7 A. Yes.

8 Q. All right. Agent Eastwood, we talked a little bit about
9 digital devices. And in the course of the search, did you
10 search and subsequently seize digital devices from that
11 residence?

12 A. Yes.

13 Q. And was one of those devices the cell phone of the
14 defendant Salim Said?

15 A. Yes.

16 Q. And prior to your testimony here today, did you have an
17 opportunity to review several exhibits that were found on
18 the cell phone of Mr. Said?

19 A. Yes, I did.

20 Q. Those were text messages?

21 A. Yes.

22 MR. JACOBS: Your Honor, at this point the
23 government would offer a series of exhibits from that cell
24 phone. It's Government GG41a, GG41b, GG41c, GG47a through
25 c, GG48a and GG50b.

1 THE COURT: Any objection?

2 MR. UDOIBOK: No objection.

3 MR. MONTEZ: No objection.

4 THE COURT: Those exhibits are admitted.

5 BY MR. JACOBS:

6 Q. Okay. So those were text messages from the phone or
7 digital device. I want to pivot now and I want to talk
8 about some documentary evidence or documents that were found
9 in the house.

10 Okay?

11 A. Okay.

12 Q. In the course of the search, did you find numerous
13 different documents that you seized pursuant to the warrant?

14 A. Yes.

15 Q. I want to walk through some of those now. Okay?

16 A. Okay.

17 Q. I'm showing you what has been marked for identification,
18 but not admitted, as Government GG2. What is this document?

19 A. This was a document, it looks like a printout of some
20 sort of communication between a few people.

21 Q. Found in the residence of Mr. Said?

22 A. Yes.

23 MR. JACOBS: Your Honor, the government offers
24 GG2.

25 THE COURT: Any objection?

1 MR. UDOIBOK: No objection.

2 MR. MONTEZ: No objection.

3 THE COURT: GG2 is admitted.

4 BY MR. JACOBS:

5 Q. All right. Agent Eastwood, you said this appears to be
6 a printout of a document. What do you mean by that?

7 A. I mean it looks like somebody screenshotted or in some
8 other way printed out a conversation that was had between
9 multiple people.

10 Q. It looks like it was maybe an instant messaging --

11 A. That's what it appears.

12 Q. -- digital conversation?

13 A. Yes.

14 Q. But this was actually found as a physical document in
15 the house?

16 A. Yes.

17 Q. Okay. And can you tell us. I'm just going to highlight
18 the top participant. Who is that individual?

19 A. Jenny Butcher.

20 Q. And what is the email address for Ms. Butcher?

21 A. Jenny.butcher@state.mn.us.

22 Q. Okay. And I'm going to highlight the first five text
23 box, and they're between different people, but can you read
24 off what these text box say?

25 A. The first one says, "Which only for new SFSP sites."

1 Would you like me to read who is saying each box
2 as well?

3 Q. Sure.

4 A. Okay. So Jenny Butcher says, "Which only for new SFSP
5 sites."

6 Cindy Anderson wrote, "And that is all sites for
7 one sponsor as it is their first year in SFSP."

8 Camille Jones says, "Isn't there a Willmar site
9 that might be good to look at?"

10 Jenny Butcher says, "You mean Stigma-Free?"

11 Camille Jones says, "I can't recall if that is the
12 one, the one claiming, or was it just on the application,
13 that 3,000 children were served per day when the direct
14 enrollment is 4,000."

15 Q. Okay. And then can you go ahead and read these next
16 two?

17 A. Jenny Butcher says, "Stigma-Free is in Willmar, and
18 Mankato and vendors are questionable. We can't find their
19 production locations, so would be good to ask AG about.
20 Annette in Willmar is unaware of this organization about
21 three blocks from her that serves 3,000 meals when school
22 district has 4,100 students in school and 200 distant
23 learning. We discussed this during a call yesterday when
24 she called with application questions, and I was encouraging
25 her to serve her community's Somali population. She is

1 definitely willing."

2 And then Jenny Butcher also says, "There should be
3 a paper trail between site and vendor and sponsor."

4 Q. All right. Pulling up another document, which has been
5 marked but not admitted as Government's GG3, what is GG3?

6 A. This looks like a letter from the Minnesota Department
7 of Education to Aimee Bock.

8 Q. Found at the residence of Mr. Said?

9 A. Found at the residence, yes.

10 MR. JACOBS: Your Honor, we would offer GG3.

11 THE COURT: Any objection?

12 MR. UDOIBOK: No objection.

13 MR. MONTEZ: No objection.

14 THE COURT: GG3 is admitted.

15 BY MR. JACOBS:

16 Q. Okay. So the jury's now looking at this. Can you --
17 let's go over a couple parts of this.

18 You said it's a letter from Minnesota Department
19 of Education?

20 A. Yes.

21 Q. And what's the date of that letter?

22 A. December 3rd, 2021.

23 Q. And who is that letter to?

24 A. It's to Aimee Bock of Feeding Our Future.

25 Q. And just as a reminder to the jury, this was found as a

1 printed hard copy where?

2 A. In the residence.

3 Q. I'm blowing up the text of that letter. Can you read to
4 the jury, can you read to the jury this paragraph?

5 A. "The following sites are denied for the CACFP 2022
6 program year. This location is a for-profit restaurant.
7 Per Federal Regulation 7 C.F.R. 226.17a and 7 C.F.R. 226.6,
8 a CACFP at-risk after school care center must meet
9 regulatory requirements. A for-profit center must be
10 eligible to participate in the program as described in the
11 definition of for-profit center in 226.2. Therefore, a
12 for-profit at risk only site does not exist because the site
13 would also have to participate in regular CACFP."

14 Q. Okay. And below that text is a table that says, "Site
15 ID and name."

16 What this site name?

17 A. Hmong Village, ASA. And the one under it is ASA
18 Limited.

19 Q. Okay. And this one here?

20 A. Olive Management.

21 Q. And this one here?

22 A. Distribution Site Safari Restaurant.

23 Q. I want to take a step back and actually talk about the
24 digital devices for another moment.

25 A. Okay.

1 Q. In addition to the text messages, did law enforcement
2 recover documents from Mr. Said's phone?

3 A. Yes.

4 Q. And are those Government's GG33 through GG39, plus
5 GG39a?

6 A. I'm not sure. I would have to see the documents.

7 Q. Okay. Moving on to some other documents found in the
8 residence.

9 A. Okay.

10 Q. Showing you what's marked for identification, but not
11 yet admitted, is Government GG4. What is this document?

12 A. This is a, it says it's an after-school meal count work
13 sheet.

14 MR. JACOBS: Your Honor, the government offers
15 GG4.

16 THE COURT: Any objection?

17 MR. UDOIBOK: No objection.

18 MR. MONTEZ: No objection.

19 THE COURT: GG4 is admitted.

20 BY MR. JACOBS:

21 Q. All right. Agent Eastwood, can you tell -- I can tell
22 you that we've seen plenty of these, but can you tell the
23 jury what we're seeing here?

24 A. This is a Feeding Our Future document for after school
25 meal counts. It looks like it's from the Southcross site.

1 Q. And is there a -- who is the sponsor?

2 A. Feeding Our Future, the Southcross site.

3 Q. Okay. And is there a supervisor listed there?

4 A. Yes.

5 Q. Who?

6 A. Kiin Anod.

7 Q. Okay. And then if you go down to the bottom here,
8 there's a line that says Site Supervisor, "By signing, I
9 certify that the above information is true and accurate."

10 Do you see that part?

11 A. Yes.

12 Q. And then below that, is there a signature?

13 A. There is.

14 Q. Can you make out what that signature or who that
15 signature appears to be?

16 A. It appears to be the same signature as the supervisor up
17 above.

18 Q. Okay. And next to that signature, there's a date box.
19 And what's included in that date box?

20 A. That box is blank.

21 Q. Okay. And on the top here, there's a "week of" box.
22 And what's included in that box?

23 A. That box is blank as well.

24 Q. And what about the rest of the meal count form?

25 A. It appears to be empty. Every box is blank.

1 Q. And what is significant about that?

2 A. To me, I would say this is significant because it's
3 signed, but it hasn't been filled out.

4 Q. Showing you what has been marked, but not admitted, as
5 GG5. What is GG5 and where was it found?

6 A. That was found in the residence. That's also a Feeding
7 Our Future meal count work sheet.

8 MR. JACOBS: Your Honor, the government would
9 offer Exhibit GG5.

10 THE COURT: Any objection?

11 MR. UDOIBOK: No objection.

12 MR. MONTEZ: No objection.

13 THE COURT: GG5 is admitted.

14 BY MR. JACOBS:

15 Q. Okay. Similar or same style of meal count that we just
16 saw?

17 A. Yes.

18 Q. Feeding Our Future on the top?

19 A. Yes.

20 Q. And then it says "Summer Meal Counts, Clicker"?

21 A. Yes.

22 Q. What is the site and sponsor here?

23 A. The sponsor is Feeding Our Future. The site is
24 Stigma-Free, Mankato.

25 Q. Okay. And who is the supervisor listed on this meal

1 count?

2 A. Supervisor is Abdinasir Abshir.

3 Q. And again, what week is this for?

4 A. That is the week of June 27th, 2021.

5 Q. All right. Unlike the last meal count we looked at,
6 this one is filled in with information?

7 A. Yes.

8 Q. Several page document?

9 A. Yes.

10 Q. Okay. And this one for a site of Stigma-Free, Mankato
11 was found where?

12 A. In the residence.

13 Q. In Plymouth, Minnesota?

14 A. Yes, yes.

15 Q. Okay. Showing you what has been marked for
16 identification, but not yet admitted, as Government GG6.
17 Another document found during the search of the residence?

18 A. Yes.

19 MR. JACOBS: Your Honor, we'd offer
20 Government GG6.

21 THE COURT: Any objection?

22 MR. UDOIBOK: No objection.

23 MR. MONTEZ: No objection.

24 THE COURT: GG6 is admitted.

25

1 BY MR. JACOBS:

2 Q. All right. Agent Eastwood, the jury is looking at this
3 now. What is Government Exhibit GG6?

4 A. It is a letter from Bridgewater Bank.

5 Q. And who is that letter to?

6 A. Cosmopolitan Business Properties LLC.

7 Q. And what is the street address listed on this letter?

8 A. 2722 Park Avenue South, Number 100, Minneapolis,
9 Minnesota.

10 Q. Okay. The date of this letter is July 7, 2021?

11 A. Yes.

12 Q. And up here, I guess you would call that the memo line,
13 what is the text at least of the memo line?

14 A. The text is addressing an account closure.

15 Q. Okay. And can you read to the jury that top paragraph
16 that I just enlarged?

17 A. "Bridgewater Bank strives to provide banking services
18 that meet the needs of our clients. A review was conducted
19 on your account. The activity identified by Bridgewater
20 Bank during the course of the account review was determined
21 to exceed the services and capabilities for monitoring your
22 account as required by Bridgewater Bank, and the
23 determination has been made to close your account."

24 Q. Okay. And the date of this letter is July 7, 2021?

25 A. Yes.

1 Q. Now pulling up what's also marked for identification,
2 but not yet admitted, as GG7, another document found during
3 the search of the residence?

4 A. Yes.

5 MR. JACOBS: Your Honor, we'd offer Government
6 Exhibit GG7.

7 MR. UDOIBOK: No objection.

8 MR. MONTEZ: No objection.

9 THE COURT: GG7 is admitted.

10 BY MR. JACOBS:

11 Q. Okay. Do these appear to be cashier's checks?

12 A. Yes, they do.

13 Q. And what are the date of these two cashier checks?

14 A. They are both dated July 7th, 2021.

15 Q. Okay. And what is the amount of that bottom one?

16 A. That amount is \$715,000. \$715,037.69.

17 Q. Okay. Top one, \$12,000, approximately?

18 A. Yes.

19 Q. All right. Showing you what's marked for identification
20 as Government's GG10, another document that was recovered
21 during the search?

22 A. Yes.

23 MR. JACOBS: Your Honor, we'd offer
24 Government GG10.

25 THE COURT: Any objection?

1 MR. UDOIBOK: No objection.

2 MR. MONTEZ: No objection.

3 THE COURT: GG10 is admitted.

4 BY MR. JACOBS:

5 Q. All right. Special Agent Eastwood, what is this
6 document?

7 A. This is a business account application at Wells Fargo.

8 Q. Okay. A bank account application?

9 A. Yes.

10 Q. And specifically here a business account?

11 A. Yes.

12 Q. And I'm going to go down towards the bottom. What is
13 the business or customer name listed here?

14 A. Salim Limited LLC.

15 Q. Okay. And the date of this application is what?

16 A. July 9th, 2021.

17 Q. Two days after that account closure letter that we just
18 saw?

19 A. Possibly. I already forgot what date that was. Yes,
20 two days after that letter.

21 Q. And showing you what's marked for identification as
22 Government GG11, another document found during that search?

23 A. Yes.

24 MR. JACOBS: Your Honor, we'd offer GG11.

25 MR. UDOIBOK: No objection.

1 MR. MONTEZ: No objection.

2 THE COURT: GG11 is admitted.

3 BY MR. JACOBS:

4 Q. Does this appear to be a deposit receipt?

5 A. It does.

6 Q. Or transaction receipt?

7 A. It does.

8 Q. For Wells Fargo Bank?

9 A. Yes.

10 Q. And it's a little crooked here, but can you make out the
11 total amount of the checks deposited?

12 A. It looks like \$715,037.69.

13 Q. All right. Moving on and showing you what is marked for
14 identification as Government GG18. Another document found
15 in hard copy form during the search of the house?

16 A. Yes.

17 MR. JACOBS: Your Honor, we'd offer Government
18 Exhibit GG18.

19 THE COURT: Any objection?

20 MR. UDOIBOK: No objection.

21 MR. MONTEZ: No objection.

22 THE COURT: GG18 is admitted.

23 BY MR. JACOBS:

24 Q. All right. Agent Eastwood, what are we seeing here?

25 A. This looks like a receipt for a payment.

1 Q. All right. And in this case, what's the date of this
2 receipt?

3 A. January 22nd, 2021.

4 Q. Okay. And the payer here is what entity?

5 A. Cosmopolitan Business Solutions LLC.

6 Q. And the payee is what?

7 A. Salim Limited LLC.

8 Q. Okay. And that total pay amount is how much?

9 A. \$277,000.

10 Q. And it looks like, if we enlarge this memo part, it has
11 a memo or explanation for the pay. What is it?

12 A. Contractor payments.

13 Q. All right. Moving on to GG19, which has been marked,
14 but not yet admitted, a similar document?

15 A. Yes.

16 MR. JACOBS: Your Honor, we'd offer Government
17 Exhibit GG19.

18 THE COURT: Any objection?

19 MR. UDOIBOK: No objection.

20 MR. MONTEZ: No objection.

21 THE COURT: GG19 is admitted.

22 MR. JACOBS: Okay. Looks quite similar to the one
23 we just saw?

24 THE WITNESS: Yes, it does.

25

1 BY MR. JACOBS:

2 Q. This one, however, has a pay date of what?

3 A. May 17th, 2021.

4 Q. And if we go down, the payer and the payee, the same?

5 A. The same.

6 Q. Cosmopolitan Business Solutions to Salim Limited?

7 A. Yes.

8 Q. And this one lists the same contractor payments under
9 "Pay"?

10 A. Yes.

11 Q. How much was this receipt for?

12 A. This one is for \$270,000.

13 Q. Okay. One more of those. Showing you what's marked for
14 identification as Government's GG20, another similar
15 document?

16 A. Yes.

17 MR. JACOBS: Your Honor, we'd offer Government
18 Exhibit GG20.

19 THE COURT: Any objection?

20 MR. UDOIBOK: No objection.

21 MR. MONTEZ: No objection.

22 THE COURT: GG20 is admitted.

23 BY MR. JACOBS:

24 Q. All right. Very similar to the one we just saw?

25 A. Yes.

1 Q. This one contains two kind of mused together?

2 A. Yes.

3 Q. And let's just go from top to bottom. The date of this
4 top one is what?

5 A. October 31st, 2020.

6 Q. And the total, here we have a payer of Cosmopolitan
7 Business Solutions and a different payee, right?

8 A. Yes.

9 Q. Who is the payee?

10 A. Cerron Properties.

11 Q. And that's for an amount of?

12 A. \$8,700.

13 Q. All right. And then going down to the second one, we
14 again have the payer and payee that we saw last time?

15 A. Yes.

16 Q. Cosmopolitan Business Solutions, payer; Salim Limited,
17 payee?

18 A. Yes.

19 Q. And the date here is what?

20 A. February 22nd, 2021.

21 Q. And how much is that payment for?

22 A. \$240,000.

23 Q. Okay. Showing you another document recovered from that
24 search, which is marked but not yet admitted, GG21.

25 What is this document?

1 A. That looks like a check.

2 Q. From the search of the residence?

3 A. Yes.

4 MR. JACOBS: Your Honor, we'd offer Government
5 Exhibit GG21.

6 THE COURT: Any objection?

7 MR. UDOIBOK: No objection.

8 MR. MONTEZ: No objection.

9 THE COURT: GG21 is admitted.

10 BY MR. JACOBS:

11 Q. Okay. And this check is from?

12 A. Salim Limited LLC.

13 Q. And it's made out to?

14 A. Lupient Chevrolet.

15 Q. Okay. And it looks like this check may never have been
16 cashed, but what's the amount of this one?

17 A. \$470,000.

18 Q. Will you take my word for it that there was another
19 check that was for \$47,000 to Lupient Chevrolet?

20 A. Yes.

21 Q. Showing you what is marked, but not admitted, as
22 Government GG25. Recognize this as another document taken
23 during the search?

24 A. I don't recognize that as something that I took, but if
25 it's in our evidence log, then I would agree it was taken

1 during the search.

2 MR. JACOBS: Your Honor, we'd offer GG25.

3 THE COURT: Any objection?

4 MR. UDOIBOK: No objection.

5 MR. MONTEZ: No objection.

6 THE COURT: GG25 is admitted.

7 BY MR. JACOBS:

8 Q. All right. Agent Eastwood, directing your attention to
9 the top of this document, what is this?

10 A. A consulting agreement.

11 Q. Okay. And in this case it looks like there's a dated
12 section here. Is it dated?

13 A. No, it is not.

14 Q. And who is this agreement purportedly between?

15 A. The client appears to be Brava Restaurant, and the
16 consultant is Sirta Salim Limited.

17 Q. Okay. And if we go down to the "services provided"
18 part, can you read off that bullet point?

19 A. "Services will include analyzing client needs and
20 current business obstacles, identifying projects, scoping
21 potential business solutions, and improving sales by
22 coordinating sales efforts with both inside and field sales
23 representatives."

24 Q. And again, the client that's listed in this contract is
25 Brava Restaurant in Rochester, Minnesota?

1 A. Yes.

2 Q. And if we go down to the last page, page 6 of that
3 document, again, there's a signature and a date section. Is
4 this signed or dated?

5 A. No, it is not.

6 Q. Okay. Showing you what's marked as Government GG26 --
7 Your Honor, we'd offer Government GG26.

8 THE COURT: Any objection?

9 MR. UDOIBOK: No objection.

10 MR. MONTEZ: No objection.

11 THE COURT: GG26 is admitted.

12 BY MR. JACOBS:

13 Q. All right. Agent Eastwood, we looked at something very
14 similar. What is GG26?

15 A. This looks like another consulting agreement, and this,
16 this one is between the client Mankato and the consultant
17 Sirta Salim Limited.

18 Q. Okay. So same consultant as the last one?

19 A. Yes.

20 Q. And this time the client is just listed as Mankato?

21 A. Yes.

22 Q. Okay. And the "services provided" bullet, can you read
23 that again?

24 A. "Services will include analyzing client needs and
25 current business obstacles, identifying projects, scoping

1 potential business solutions, and improving sales by
2 coordinating sales efforts with both inside and field sales
3 representatives."

4 Q. Okay. Going down again to the last page here, the
5 signature block, it looks like there's a signature line for
6 the -- for Mankato?

7 A. Yes.

8 Q. And a signature line for Sirta Salim Limited?

9 A. Yes.

10 Q. Is it signed?

11 A. No, it is not.

12 Q. Okay. Pulling up what's marked as Government's GG27.

13 Your Honor, we'd offer Government GG27.

14 THE COURT: Any objection?

15 MR. UDOIBOK: No objection.

16 MR. MONTEZ: No objection.

17 THE COURT: GG27 is admitted.

18 BY MR. JACOBS:

19 Q. All right. Blowing up the top. We've seen this before.
20 What is it?

21 A. Consulting agreement.

22 Q. And in this purported consulting agreement, who is it
23 between?

24 A. The same consultant, Sirta Salim Limited, and this time
25 the client is Willmar.

1 Q. Willmar is a town in Minnesota?

2 A. Yes.

3 Q. Okay. I won't make you read it again, but is the
4 services provided exactly identical to what we saw in the
5 last two unsigned consulting agreements?

6 A. It looks like it is, yes.

7 Q. Okay. And again, going down to the bottom, there is a
8 signature box?

9 A. Yes.

10 Q. This one having a signature line for Mankato?

11 A. Yes.

12 Q. Is it signed?

13 A. No, it is not.

14 Q. Okay. Similarly to the other two, it's unsigned. And
15 this was found where?

16 A. In the residence.

17 Q. All right. Showing you one final one. It's GG24, which
18 has been marked but not yet admitted.

19 Q. What is, what is this document?

20 A. This is a purchase and sale agreement.

21 Q. Found during the search?

22 A. Yes.

23 Q. In hard copy? In hard copy form?

24 A. Yes.

25 Q. Printed out?

1 A. Yes.

2 MR. JACOBS: Your Honor, we'd offer Government
3 Exhibit GG24.

4 THE COURT: Any objection?

5 MR. UDOIBOK: No objection.

6 MR. MONTEZ: No objection.

7 THE COURT: GG24 is admitted.

8 BY MR. JACOBS:

9 Q. All right. Agent Eastwood, now that the jury is looking
10 at it, can you tell us what we're seeing here in GG24?

11 A. It's a purchase and sale agreement. It lists the
12 purchaser and a seller.

13 Q. In this particular case, it's for the purchase of, it
14 looks like, property?

15 A. Looks like property, yes.

16 Q. Okay. And here the purchaser is listed as what?

17 A. Cosmopolitan Business Properties LLC.

18 Q. Okay. And if we go down here, we see the address of
19 what?

20 A. 2722 Park Avenue, Minneapolis, Minnesota.

21 Q. And we have a purchase price here. What's the purchase
22 price for this property?

23 A. Purchase price is \$2,780,000.

24 Q. All right. Going down to this last page, the purchaser
25 is listed as who?

1 A. Cosmopolitan Business Properties.

2 Q. And it's dated on what date?

3 A. June 23rd, 2021.

4 Q. And is it signed by Salim Said?

5 A. That does look like the signature, yes.

6 Q. Listed as the general manager/president?

7 A. Yes.

8 Q. For the purchase of that \$2.7 million property?

9 A. Yes.

10 Q. Special Agent Eastwood, you testified about this
11 earlier, but you are not a case agent on this case?

12 A. No, I was not.

13 Q. Your work on this case exclusively revolved around your
14 searching of this site?

15 A. Yes.

16 MR. JACOBS: Your Honor, no further questions for
17 this witness.

18 THE COURT: Okay. Mr. Udoibok, any
19 cross-examination?

20 MR. UDOIBOK: No, Your Honor.

21 THE COURT: Mr. Montez?

22 MR. MONTEZ: No questions, Your Honor.

23 THE COURT: Agent, you may step down. Thank you.

24 THE WITNESS: Thank you.

25 THE COURT: We'll go ahead and end there for the

1 day.

2 All rise for the jury.

3 All right. We'll see you all at 9:00 a.m.

4 tomorrow morning. Have a good night.

5 4:21 p.m.

6 **IN OPEN COURT**

7 **(JURY NOT PRESENT)**

8 THE COURT: Does anyone else have anything for the
9 record or otherwise?

10 MR. THOMPSON: No, Your Honor.

11 THE COURT: All right. All right. We'll see you
12 all at 9:00 tomorrow morning. Have a good night.

13 (Court adjourned at 4:22 p.m., 02-25-2025.)

14 * * *

15 I, Renee A. Rogge, certify that the foregoing is a
16 correct transcript from the record of proceedings in the
17 above-entitled matter.

18 Certified by: /s/Renee A. Rogge
19 Renee A. Rogge, RMR-CRR

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