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UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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United States of America,	)	File No. 22-cr-223
	)	(NEB/DTS)
Plaintiff,	)	
	)	
v.	)	
	)	Courtroom 13W
Aimee Marie Bock(1),	)	Minneapolis, Minnesota
Salim Ahmed Said(3),	)	Wednesday February 26, 2025
	)	9:00 a.m.
Defendants.	)	
	)	

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

**VOLUME XI - JURY TRIAL PROCEEDINGS**

Court Reporter: RENE E. 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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1       **9:00 A.M.**

2                               **IN OPEN COURT**

3                               **(JURY PRESENT)**

4               THE COURT:  You may all be seated.  Good morning.

5               We are on the record, and the government my call  
6       its next witness.

7               Mr. Ebert.

8               MR. EBERT:  Good morning.  Thank you, Your Honor.  
9       The government calls Cerresso Fort.

10              THE COURT:  Good morning.  I will have you come  
11     forward to me.  You are going to come all the way up to the  
12     witness chair.

13              Could you stand before me to take the oath.  Raise  
14     your right hand.

15                               CERRESSO FORT

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

18              THE WITNESS:  Yes.

19              THE COURT:  Thank you.  You may be seated.

20              And when you are settled could you state and spell  
21     both your last name fort the record.

22              THE WITNESS:  Cerresso Fort, C-E-R-R-E-S-S-O.  
23     F-O-R-T.

24              THE COURT:  Thank you.

25              Mr. Ebert, you may inquire.

1 MR. EBERT: Thank you, Your Honor.

2 DIRECT EXAMINATION

3 BY MR. EBERT:

4 Q. All right. Good morning, Mr. Fort.

5 A. Good morning.

6 Q. How are you doing this morning?

7 A. Good.

8 Q. First of all, just to start off, I'm going to ask you a  
9 few questions about you. Okay?

10 A. Okay.

11 Q. How old are you?

12 A. 38.

13 Q. Can you tell the jury where you grew up?

14 A. Grew up in St. Paul, Minnesota.

15 Q. And then did you attend school in St. Paul?

16 A. Correct. Yep, all schools in St. Paul.

17 Q. And the schools you attended in St. Paul, was that  
18 through the St. Paul Public School System?

19 A. Yes.

20 Q. And did you go all the way through high school?

21 A. Yes.

22 Q. Where did you graduate from high school?

23 A. Harding High School.

24 Q. For people on the jury who aren't familiar, where is  
25 harding in St. Paul?

1 A. East side of St. Paul, and it's considered the biggest  
2 high school in St. Paul.

3 Q. And is it located in one building?

4 A. Yes.

5 Q. How would you describe the building where you went to  
6 high school, Harding?

7 A. It's a long building. It's no upstairs. It's not like  
8 a three-floor building. It's just everything is one, one  
9 floor. It's long, long.

10 Q. Do you know about how many kids went to Harding High  
11 School in St. Paul?

12 A. Oh, we talk about 20 years ago. It was probably about  
13 25, 2,000 to a lot. It was probably around 2,000.

14 Q. Kids?

15 A. Kids, I would say that.

16 Q. What do you do for a living now?

17 A. Now I, I operate in, running a boxing club.

18 Q. A boxing club?

19 A. Mm-hmm.

20 Q. What happens at a boxing club?

21 A. We train members that want to lose weight. Some want to  
22 learn boxing and self-defense.

23 Q. And are you a boxer yourself?

24 A. A former boxer, yes.

25 Q. When you say "former boxer," what do you mean?

1 A. Meaning like I former, I competed at a present time, but  
2 not presently now. Now I go a hundred percent in coaching  
3 and then running my boxing club to be successful.

4 Q. And how long have you been running your own boxing club  
5 since you retired from it?

6 A. Ten years. This year makes ten years.

7 Q. Okay. What's the name of your boxing club?

8 A. Cerresso Fort Boxing and Fitness LLC.

9 Q. And does that sometimes go by the name SIR Boxing Club?

10 A. Yeah, boxing club. My professional boxing alias was  
11 SIR.

12 Q. Like S-I-R?

13 A. S-I-R, yes. So I want to come back and gravitate and  
14 bring something to Minnesota and help, help enhance our  
15 young athletes, and I decided to open SIR Boxing Club.

16 Q. And where is SIR Boxing Club located right now?

17 A. East St. Paul.

18 Q. I'm going to show you a picture on the screen right in  
19 front of you there, Mr. Fort.

20 A. Yes.

21 Q. And ask you to take a look at that. And this is  
22 something that has been marked, but not yet admitted into  
23 evidence. It's marked as Exhibit P14.

24 Do you see a couple photographs up on your screen?

25 A. Yes.

1 Q. And do you recognize what's in the pictures?

2 A. Yes.

3 Q. And is that a location where you used to have your  
4 boxing club?

5 A. Yes.

6 MR. EBERT: Okay. Your Honor, at this time the  
7 government offers P14 into evidence.

8 THE COURT: Any objection?

9 MR. UDOIBOK: No objection.

10 MR. MONTEZ: No objection.

11 THE COURT: P14 is admitted.

12 BY MR. EBERT:

13 Q. Okay. So now, Mr. Fort, the picture that you see  
14 everyone in the courtroom now can see. So I want to direct  
15 your attention to that.

16 Can you tell the jury what we see in this imagine  
17 on the screen?

18 A. Cars, snow, a building.

19 Q. What about the building? What, do you recognize that  
20 building?

21 A. Yeah, different, different suites. So it's a building,  
22 a mall strip building with different businesses there. Some  
23 businesses, like a space there for retail space there is  
24 available.

25 Q. And did you used to work at this place?

1 A. Yes.

2 Q. Okay. What --

3 A. I was down in the basement.

4 Q. And when you say you were down in the basement, is it,  
5 which part of the building were you located in?

6 A. So what happened is, you go in there. Where the red is,  
7 you go inside the doors there, and you go down the stairs.  
8 And you make a right, and then I was like underneath,  
9 underneath the part here where it says rental space kind of  
10 where the double doors are.

11 Q. Do you see --

12 A. There you go.

13 Q. Is that the area you are describing?

14 A. Yeah, I was underneath there, and it was actually a bait  
15 shop that was in there.

16 Q. A bait shop?

17 A. So every time water would like, we would get water in  
18 the gym, so it was kind of, it got bad. Yeah.

19 Q. You've since switched locations, right?

20 A. Yes, yes.

21 Q. And so under, the area that's highlighted in yellow,  
22 just so we're clear, it's the basement level where you had  
23 your gym; is that right?

24 A. Yes.

25 Q. And about how many people on a usual day are in your gym

1 training with you?

2 A. About between 25 and 30.

3 Q. And then do you see the big sign up there? It says  
4 Arcade Business Center?

5 A. Yes.

6 Q. Was that the name of this, this kind of retail strip  
7 mall building we're looking at?

8 A. Yes.

9 Q. Okay. And then generally about how many cars were able  
10 to park in the lot that we see there?

11 A. So you're saying when the lot was full?

12 Q. Yeah.

13 A. Approximately about 25 cars, I mean possibly more,  
14 because you look at the very back there. Probably about 25,  
15 between 25 and 40 cars.

16 Q. So now I want to kind of direct your attention back in  
17 time a couple years, Mr. Fort, and sort of think back to the  
18 time period of 2020 and 2021. Okay.

19 A. Okay.

20 Q. And so during that time period, when it was the  
21 pandemic, do you remember that?

22 A. Yep, the pandemic.

23 Q. Were you, did you still have your business operating  
24 from this location?

25 A. Yes.

1 Q. Okay. And on a typical, on a typical week, were you  
2 still coming to your business at the Arcade Business Center?

3 A. Yes.

4 Q. And this is located in St. Paul; is that right?

5 A. Yes.

6 Q. So during that time period of the pandemic, how often  
7 would you come to this location?

8 A. I'd be in and out all day. Take Sundays off, but I  
9 would be there about six days out of a week.

10 Q. Okay. And so the number that we see there, 1440, do you  
11 see that on the sign?

12 A. Yes.

13 Q. 1440, is that the, sort of the address number for your  
14 former building?

15 A. Yes. For the whole building, yeah.

16 Q. And you said a moment ago that there were a couple  
17 different businesses that were located in this building; is  
18 that right?

19 A. Yes.

20 Q. Above you was the leaking bait shop?

21 A. Yeah. The bait shop, yep, upstairs.

22 Q. Was there like an office or a suite letter or number for  
23 your boxing gym?

24 A. Yep.

25 Q. What was it?

1 A. Suite E.

2 Q. E? All right. Now I want to show you a couple other  
3 documents on your screen, Mr. Fort, that have already been  
4 admitted as evidence. All right?

5 A. Okay.

6 Q. So I'm showing you page 15 of Exhibit P6.

7 And in the upper left, do you see where it says MN  
8 for Minnesota Department of Education?

9 A. Yes.

10 Q. And then there's some typed information below that. And  
11 I'm going to enlarge it so you can see it a little better.  
12 Okay?

13 A. Okay.

14 Q. Do you see where it says the word "sponsor," and it has  
15 now been highlighted in yellow?

16 A. Yes.

17 Q. And then next to it there's some numbers. Do you see  
18 those numbers?

19 A. Yes.

20 Q. And right after it there's some words there. What does  
21 that say?

22 A. Feeding Our Future.

23 Q. Do you know what Feeding Our Future is?

24 A. No.

25 Q. Okay. Now down below it there's some more words. Do

1 you recognize any of them?

2 A. Yes.

3 Q. What do you recognize?

4 A. SIR Boxing Club.

5 Q. And there's an address below it. What do you recognize  
6 that address to be?

7 A. 1440 Arcade Street, Suite E.

8 Q. In other words --

9 A. St. Paul, Minnesota.

10 Q. And is that address the building we just looked at a  
11 moment ago?

12 A. Yes.

13 Q. Your former?

14 A. The building is not, you know, but I'm located inside of  
15 the building, which got multiple different usage spaces.

16 Q. In fact, you're in Suite E?

17 A. Suite E, yeah.

18 Q. Is that right?

19 A. Correct.

20 Q. This document on your screen, is this something that you  
21 put together?

22 A. No.

23 Q. Prior to your being as a witness, had you ever seen this  
24 before?

25 A. No.

1 Q. Is it a surprise to you to see SIR Boxing Club, Suite E,  
2 St. Paul, with this Minnesota Department of Education  
3 document?

4 A. Yeah, big surprise.

5 Q. Big surprise?

6 A. Yes.

7 Q. Were you ever serving food out of your boxing club?

8 A. No.

9 Q. Were you feeding thousands of children from your boxing  
10 club location?

11 A. Would love to, but, no. Haven't.

12 Q. I show you another page from this same exhibit,  
13 Exhibit P6. At your location in that Arcade building in  
14 St. Paul, did you or that building based on your time being  
15 there have the capacity to serve and feed 2,500 daily meals  
16 to children?

17 A. The math ain't math. That's a lot. That math ain't  
18 mathing.

19 Q. Did that math make sense to you?

20 A. No. It's not even the capacity we can have inside our  
21 space, no.

22 Q. Even close?

23 A. That's not even, that's -- can't even imagine it.

24 Q. If that amount of meals, 2,500, were happening in that  
25 building where you worked, is that something you think you

1 would have seen?

2 A. Yes.

3 Q. And is that something you ever saw, 2,500 meals to  
4 children every day?

5 A. To children, no, I didn't see that.

6 Q. All right. Mr. Fort, I'm going to show you another  
7 picture up on your screen. Okay? And this has been marked  
8 but not admitted, and it's Exhibit Y17.

9 Do you see that on your screen?

10 A. Yes.

11 Q. Do you recognize the person in that photo?

12 A. Yes. Empress Watson, a childhood -- someone that we  
13 boxed together back when we was -- when we first started  
14 boxing, we was in a boxing club together. We traveled and,  
15 yeah, boxing amateur boxing events.

16 Q. Okay.

17 MR. EBERT: Your Honor, at this time the  
18 government offers Exhibit Y17.

19 MR. UDOIBOK: No objection.

20 MR. MONTEZ: No objection.

21 THE COURT: Y17 is admitted.

22 BY MR. EBERT:

23 Q. All right. So, Mr. Fort, the gentleman that you are  
24 talking about, his name is Empress Watson; is that right?

25 A. Yes.

1 Q. Does he also go by the name Malcolm, do you know?

2 A. Malcolm? Yes. I don't know if he go by that name.  
3 Malcolm you said?

4 Q. Yeah.

5 A. That is his name, isn't it?

6 Q. That is his name?

7 A. That is his name, isn't it?

8 Q. What do you know him as?

9 A. Empress.

10 Q. Empress Watson. And did Empress Watson, did he train at  
11 your gym in 2020 and 2021?

12 A. Yes, he was a member at the club at the time, around  
13 that time.

14 Q. And were there times that he would come in with a  
15 girlfriend?

16 A. No. He would come in -- not come in with. A lot of  
17 times the girlfriend would pick him up.

18 Q. I'm showing you Exhibit Y1, a photograph of Aimee Bock.  
19 Do you recognize her?

20 A. Yes.

21 Q. Who is -- how do you recognize her?

22 A. You mean how?

23 Q. Yes.

24 A. The eyes, the hair is, yes, Aimee.

25 Q. Did she come to your boxing club with Mr. Watson

1 sometimes?

2 A. Yes.

3 Q. All right. And do you see Aimee Bock here in court  
4 today?

5 A. Yes.

6 Q. Can you point her out based on what she's wearing?

7 A. Point her out?

8 Q. Yes, please.

9 A. She's right there.

10 Q. When you say, "She's right there," is she wearing what  
11 appears to be a white sweater?

12 A. White sweater, yes.

13 MR. EBERT: Your Honor, may the record reflect  
14 that the witness has identified Ms. Bock?

15 THE COURT: The record will so reflect.

16 BY MR. EBERT:

17 Q. About how many times do you think you saw Ms. Bock come  
18 to your boxing club with Mr. Empress Watson?

19 A. A few times.

20 Q. A few times?

21 A. Not many, but a few times. And like I said, a lot of  
22 times it wasn't like hanging out, more so coming to pick up  
23 I think, and then they would leave.

24 Q. And that's when you would see Aimee Bock at your club?

25 A. That's when I -- yes.

1 Q. All right. I'm going to show you a few more items that  
2 are in evidence, and the jury will recognize this as P6, as  
3 an item obtained from the Feeding Our Future office space.

4 And this is a photocopy of some records, Mr. Fort.  
5 And at the very top, do you see where it says Permanent File  
6 in all capital letters?

7 A. Yes.

8 Q. And then to the left, do you recognize some of those  
9 words?

10 A. Yes.

11 Q. Your business SIR Boxing?

12 A. Yeah.

13 Q. And your address at 1440 Arcade Street in Suite E in  
14 St. Paul?

15 A. Yes. I never committed, I never agreed on, okayed that  
16 my business be used for anything. This is under my  
17 knowledge of knowing that this is happening.

18 Q. All right. And as we move on to the second page, do you  
19 once again see your business SIR Boxing listed on this  
20 Feeding Our Future submission to MDE?

21 A. Yes.

22 Q. With a claim month of August 3rd, 2020? Did I read that  
23 correctly?

24 A. Yes.

25 Q. And beneath that, do you see a name that is handwritten?

1 A. Yes.

2 Q. What does it say?

3 A. Aimee Bock.

4 Q. Were you aware that Aimee Bock submitted these documents  
5 to MDE?

6 A. No.

7 Q. Using the name of your business, SIR Boxing?

8 A. No, not -- no acknowledgement on my end that this was  
9 going to happen.

10 Q. I take it, then, Aimee Bock never asked your permission  
11 for this to happen; is that right?

12 A. Never.

13 Q. What is your reaction to seeing these documents from  
14 Aimee Bock that list your business SIR Boxing?

15 A. My reaction is, is it's pretty bad because someone like  
16 myself that's really trying to do the best I can in the  
17 community and help the kids, I don't really want to be, you  
18 know, I don't want to be misled or looked at as if, you  
19 know, my business is with something that's not right for --

20 Yeah. I feel really awful, you know. I feel  
21 really awful.

22 Q. And continuing with this same exhibit, Exhibit P6, do we  
23 see again more references to Aimee Bock throughout this  
24 document, including again here on page 7?

25 A. Yes.

1 Q. Now let's take a look at the ninth page of this exhibit.  
2 At the top does it talk about required elements and civil  
3 rights training?

4 A. Yes.

5 Q. And once again at the location, it's your company. Is  
6 that what it says, SIR Boxing, and STP for St. Paul?

7 A. Yes.

8 Q. And it shows a date of training supposedly on July 28th,  
9 2020, at 6:00 p.m. Did I read that correctly?

10 A. Yes.

11 Q. Do you know anything about this elements and training  
12 involving SIR Boxing that we see on the screen?

13 A. When you say "training," boxing training?

14 Q. No. I'm talking about the civil rights training. Do  
15 you know anything about that?

16 A. No.

17 Q. Okay. And do you see who is listed as the person who is  
18 giving this training?

19 A. Yes.

20 Q. And what does it say?

21 A. Aimee Bock.

22 Q. And then the attendee who is supposedly receiving this  
23 civil rights and program training is what name?

24 A. Malcolm Watson.

25 Q. The person that you would train with at the gym?

1 A. Yes.

2 Q. Were you aware that your business name was being used in  
3 this way on this document?

4 A. No. No, I didn't know it was training -- I have no --

5 Q. You don't know anything about this?

6 A. No. It's new to me.

7 Q. All right. Mr. Fort, now I'm going to show you some  
8 documents from Exhibit P7. And up on the right does it say  
9 FY21, Arcade, July?

10 A. Yes.

11 Q. And as we scroll through it, do you see multiple forms  
12 that are all titled Summer Meal Counts Clicker?

13 A. Yes.

14 Q. And let's take a look at one of them. This one for the  
15 week of the 4th of July 2021 for a sponsor, does it say  
16 Feeding Our Future?

17 A. Yes.

18 Q. And for an email does it say  
19 aimee@feedingourfuturemn.org?

20 A. Yes.

21 Q. And then you see in handwriting after the week of, do  
22 you see that that I've highlighted now in yellow?

23 A. Yes.

24 Q. Does it say July 4th?

25 A. Yes.

1 Q. And on each of the days of this week, do you see the  
2 Number 2500?

3 A. Yes.

4 Q. 2,500, is that larger, is that larger, Mr. Fort, 2,500,  
5 than the enrollment at Harding High School where you went to  
6 high school?

7 A. Pretty big, yes, yes. That's a lot. Another time my  
8 math is not mathing on this. That's a large number.

9 Q. When you say the math is mathing or not mathing --

10 A. Not mathing, like it don't add up to me.

11 Q. It doesn't add up?

12 A. It don't add up. It don't make sense that many kids in  
13 the facility.

14 Q. Did you observe 2,500 meals to children?

15 A. No, I didn't. I haven't observed it.

16 Q. Every single day?

17 A. No.

18 Q. Including on the 4th of July?

19 A. No. 4th of July the gym is typically closed. A lot of  
20 times I have family in town, so I wasn't even present that  
21 day.

22 Q. Is that the type of thing you think you would have known  
23 about or heard about if a population larger than your high  
24 school descended upon your building to get food?

25 A. Yes.

1 Q. And did you?

2 A. No.

3 Q. And you can see copies of these sheets of paper continue  
4 on and on. Do you see that? As it's moving down, do you  
5 see that, Mr. Fort?

6 A. Yes.

7 Q. 2,500 supposedly served every single day. Is that what  
8 it says?

9 A. Yes. And like I said, I wish we could, I would love to  
10 do something like this for the kids in the community every  
11 single day. It's needed. I mean should you say, with that  
12 number is outrageous.

13 Q. Why do you say that it's outrageous, Mr. Fort?

14 A. Because that number of, like I said population at the  
15 high school is, that's a lot of individuals that, and the  
16 gym size or if you are looking at the location, it's not  
17 that big.

18 Q. And right now we've just looked at through the month of  
19 July 2021.

20 Now I'm showing you Exhibit P8. And in the upper  
21 right, do you see the letters AUG for August?

22 A. Yes.

23 Q. And do we see here the same type of supposed numbers of  
24 children served every single day at your location? Is that  
25 what you see on your screen, Mr. Fort?

1 A. That is what I see. It's --

2 Q. That's what you see. That's what you see on the screen?

3 A. Inaccurate. That's not, that's not happening. That  
4 didn't happen at my club. That large number there, no.

5 Q. And continuing on in Exhibit P10 for the month of  
6 August, excuse me, October of 2021, do you see 2,128 meals  
7 being handed out there every single day in October?

8 A. No.

9 Q. And these are every single day of the week. Is that how  
10 this shows on this form?

11 A. Yes.

12 Q. In fact, Halloween day, 2021, is this true that it says  
13 2,604 meals were handed out at that building where your gym  
14 was located on Halloween day?

15 A. Like I said, Halloween day I wasn't even present. I was  
16 with my kids taking them -- yeah, that's a large number.

17 Q. Does that make sense to you?

18 A. It doesn't make sense. It doesn't make sense at all.

19 Q. I'm showing you page 9 of Exhibit P10. And I'm going to  
20 make this a little bit bigger. Based on your time at your  
21 gym building throughout the pandemic, did you ever know or  
22 hear anything about something called Star Distribution?

23 A. No.

24 Q. Mr. Fort, what is your reaction to seeing your company's  
25 name and address used throughout these documents in this

1 way?

2 A. I feel, like I say, awful. It feels, this is -- I  
3 couldn't, I mean, amazingly like this is really confusing.  
4 And I don't want to push anyone down because I understand,  
5 but this is like why, like why would I even be --

6 This is ludicrous. Why would I be like this and  
7 involved. A woman named -- if I'd indicate that it should  
8 happen, why would it happen? I don't understand. This is,  
9 it's not right.

10 Q. All right. Thank you.

11 MR. EBERT: I have no further questions.

12 THE COURT: Mr. Udoibok.

13 MR. UDOIBOK: Yes, Your Honor.

14 CROSS-EXAMINATION

15 BY MR. UDOIBOK:

16 Q. Good morning, sir.

17 A. Good morning.

18 Q. My name is Kenneth Udoibok, and I represent Aimee Bock  
19 who you see in court.

20 So I don't think you did anything wrong, so don't  
21 be nervous. All right?

22 Your building -- do you own the Arcade building?

23 A. No, I don't own the building.

24 Q. All right.

25 A. I renting out space downstairs underground, the

1 basement, little bit of basement area, Suite E.

2 Q. And then there are other tenants, correct?

3 A. There are other tenants.

4 Q. And your, your club is in the basement, as you  
5 testified, correct?

6 A. Yes.

7 Q. All right. And do you know all the tenants in the  
8 building?

9 A. No.

10 Q. Okay. Do you know other people who have -- let me back  
11 up. You don't know all the tenants, correct?

12 A. No.

13 Q. All right. And you don't know what type of leases other  
14 tenants have?

15 A. Correct.

16 Q. All right. And you agree with me that your location,  
17 sometimes people call it SIR Boxing Club, because you've  
18 been there for a long time, right?

19 A. Yes.

20 Q. And others call it the Arcade, right?

21 A. No one called it the Arcade.

22 Q. Okay.

23 A. My boxing club?

24 Q. No, not your boxing club.

25 A. Okay.

1 Q. I'm talking about the complex.

2 A. The complex, yes. Yes, it's Arcade Business Center.

3 Q. The Arcade Business Center. Folks call the Arcade?

4 A. Yes, they could.

5 Q. And some because of your -- would you say you were  
6 pretty popular in St. Paul?

7 A. Yes.

8 Q. All right. And some people have used SIR Boxing Club to  
9 call Arcade, correct?

10 A. Yes.

11 Q. All right. If people want to come to the Arcade, some  
12 people would say I'm going to SIR Boxing Club. It doesn't  
13 necessarily mean they have a membership with you, but  
14 that's -- people know that building?

15 A. Yes.

16 Q. All right. So you were never involved with the food  
17 program, correct?

18 A. Correct.

19 Q. But you know some people in the food program, correct?

20 A. Yes.

21 Q. All right. Was there a time that a refrigeration was  
22 put in your club?

23 A. No.

24 Q. Okay. Do you know Empress Watson?

25 A. Yes.

1 Q. All right. And a boyhood friend, boxing?

2 A. Yeah. From boxing, yeah.

3 Q. Now, you never submitted an application to MDE for  
4 participation in the food program, right?

5 A. No.

6 Q. All right. And do you know whether Mr. Watson submitted  
7 an application to MDE to participate in the food program?

8 A. No.

9 Q. Do you know whether you were in the basement, and  
10 upstairs somewhere in the building there was someone  
11 participating in the food program, do you know?

12 A. Correct, yes.

13 Q. Okay. You knew?

14 A. So, so what I said -- okay. When kids would leave on  
15 Saturdays, they will leave, and they will go upstairs and  
16 get, and get food.

17 Q. All right.

18 A. They leave with food. And like I said, that happened.  
19 And I was like, man, this is really a good thing this  
20 happening. I like that that's going on. But then as you  
21 fast-forward now me seeing these numbers and everything.

22 Q. Well, your testimony is, remember I said you are not in  
23 trouble. You, you didn't fill out any application to go  
24 into a food program.

25 A. No.

1 Q. Yeah. But you knew somebody upstairs that give out free  
2 food, right?

3 A. Yes.

4 Q. Okay. But you never ask what kind of program it was,  
5 correct?

6 A. No.

7 Q. For you, all you care about was the kids going upstairs  
8 and getting food before they left, right?

9 A. Yes.

10 Q. Okay.

11 A. Good things. Like I said, it was apples, fruit and  
12 different things, and it was, like I said, that was a good  
13 thing, you know, the kids leaving with that. But then, you  
14 know, like I say, you fast-forward it and it's -- yeah.

15 Q. You just don't, you just don't -- can't imagine the  
16 numbers, right? That's what you think. You didn't see  
17 that, those numbers, correct?

18 A. Correct.

19 Q. All right. But you don't know whether someone there was  
20 delivering food to homes.

21 A. No, I don't know what was going on.

22 Q. Okay.

23 A. I don't know. I can't speak on that.

24 Q. You can't speak on, yeah, what was going on.

25 A. No, no, no. That part I don't know. I just don't know.

1 Q. You don't know whether they were delivering or not?

2 A. I don't know. I don't know.

3 Q. All right. So I want, I want to talk to you a bit about  
4 a document that is in evidence regarding this SIR Boxing  
5 Club. So is it possible that because your name was popular  
6 with kids and families that someone could use SIR Boxing  
7 Club as a location to identify where the building?

8 Is that possible?

9 MR. EBERT: Objection, Your Honor. Calls for  
10 speculation.

11 THE COURT: Sustained.

12 BY MR. UDOIBOK:

13 Q. All right. I want to direct your attention to  
14 Exhibit A75. So this is -- the jury's already seen this  
15 before. There is an email from Ms. Bock to Kendra Pace. It  
16 was a site application.

17 You don't know anything about it because you  
18 haven't applied to be a site, correct?

19 A. Correct.

20 Q. All right. So I want to take you to --

21 Ms. Mallet, would you call up paragraph 3?

22 MR. EBERT: Your Honor, I'm going to object as  
23 lack of foundation and well beyond the scope.

24 THE COURT: Could I see page 3, and I will rule.

25

1 BY MR. UDOIBOK:

2 Q. All right. Now do you see --

3 THE COURT: Wait. You are going to ask about this  
4 paragraph?

5 MR. UDOIBOK: I'm leading up to it.

6 THE COURT: All right. I'm overruling the  
7 objection.

8 MR. UDOIBOK: Excuse me?

9 THE COURT: I'm overruling the objection. You may  
10 go ahead.

11 MR. UDOIBOK: All right.

12 BY MR. UDOIBOK:

13 Q. So people refer to the building that you had a boxing  
14 club, that building, as SIR Boxing, correct?

15 A. Correct.

16 MR. EBERT: Objection. That misstates his  
17 testimony.

18 THE WITNESS: The building?

19 MR. UDOIBOK: Yes.

20 THE COURT: Overruled. You may answer.

21 MR. UDOIBOK: The people call that building, well  
22 SIR Boxing?

23 THE WITNESS: I wouldn't think there's different,  
24 but someone, if they just know the boxing, I mean someone  
25 could say that's the boxing gym over there, you know. If

1 they on a city bus or just riding, that's the boxing gym.

2 BY MR. UDOIBOK:

3 Q. The boxing gym was the most popular business in that  
4 building?

5 A. I would say so.

6 Q. And then some people call it the Arcade, correct?

7 A. Possibly so.

8 Q. Okay. Now --

9 A. The Arcade Business Center, yeah.

10 Q. So you testified earlier that, that they were giving out  
11 food to your kids upstairs. All right.

12 A. Yeah, some of the kids, they would leave the gym, and  
13 they would go and leave with food. They would go up and get  
14 food.

15 Q. Did you ever go inside? Did you ever go inside the  
16 building? Do you know whether there was a nonprofit or  
17 for-profit?

18 A. I don't know. I'm not sure.

19 Q. Did the kids pay for the food, do you know?

20 A. No, they did not.

21 Q. They did not pay for the food.

22 Now, do you know that there was confusion about  
23 the location of the, the SIR Boxing Club distribution?

24 MR. EBERT: Objection. Lack of foundation. It  
25 also assumes facts that are not in evidence.

1 THE COURT: Sustained.

2 MR. UDOIBOK: I'll move on.

3 BY MR. UDOIBOK:

4 Q. Now let's go to, let's go to P14.

5 All right. So you testified earlier you see it's  
6 called the Arcade Business Center, right?

7 A. Yes.

8 Q. And then the, to the right is, it looks like a garage.  
9 What is it? Is that the bakery? What's that building  
10 highlighted?

11 A. That's the, that space operation, nothing there going on  
12 right now.

13 Q. Are you in the basement of that?

14 A. Yes, correct. I was.

15 Q. Basement of that?

16 A. Yeah, downstairs.

17 Q. But so, and then the rest of the complex, they're  
18 businesses, correct?

19 A. Different, yep.

20 Q. Could you --

21 A. Different tenants.

22 Q. Is it to the left? Where would the kids go to pick up  
23 food?

24 A. They will go upstairs, upstairs. But sometimes they  
25 wouldn't even have to go upstairs because, you know,

1 individuals would be outside, bring it to them.

2 Q. So the kids would be outside, and individuals will bring  
3 the food to the kids?

4 A. Yes.

5 Q. Okay. So at least your testimony is, food was being  
6 distributed, correct?

7 A. Yes.

8 Q. Okay. I just want to make sure. But you don't, you  
9 think the number is exaggerated, right?

10 A. Yes.

11 Q. Okay. So let's go to P6. Now I want you to just walk  
12 through this carefully.

13 On the top there it says SIR Boxing, correct?

14 A. Yep, SIR Boxing.

15 Q. Let's go to the next page, Ms. Mallet.

16 The program name is SIR Boxing, correct? To the  
17 left, it says program name SIR Boxing?

18 A. Yes.

19 Q. And you don't know anything about it, right? You seeing  
20 this the first time?

21 A. Yes.

22 Q. Okay. Do you remember, I said you are not in trouble.  
23 I'm not saying you did anything. So let's keep on going.

24 And again it says site name SIR Boxing. Do you  
25 see that?

1 A. Yes.

2 Q. What's your name? What's your real name?

3 A. Cerresso.

4 Q. Cerresso. Is your name written at all on this document?

5 A. No.

6 Q. Okay. Just the name of your business, correct, and the  
7 location?

8 A. Yes.

9 Q. All right. And remember you testified earlier that SIR  
10 Boxing is very popular. You are the most popular business  
11 in that building, correct?

12 A. Yes.

13 Q. Okay. Let's go to page 15.

14 All right. So you see the site. It's called SIR  
15 Boxing Club, right? Do you see that?

16 A. Yes.

17 Q. All right. Is your name on it?

18 A. No.

19 Q. All right. Let's just walk through it a little bit.

20 Go to the next page.

21 Do you see the check on --

22 Highlight Number 9, method of meal preparation.

23 Do you see meals prepared on site? Do you see  
24 that?

25 A. Yes.

1 Q. All right. Let's go to the delivery section, the next,  
2 participation. Site participation. There you go.

3 Do you see I certify the after-school care program  
4 at each sponsored site?

5 And go down more. Highlight more.

6 And then see Number 3. Students who are part of  
7 school sports teams and clubs can receive after-school  
8 snacks or meals as part of a broad based, overarching  
9 educational or enrichment program offered by a school.

10 Do you see that?

11 A. Yes.

12 Q. Did any of your -- you said, you testified that kids  
13 will go upstairs, or they will bring the food down to them  
14 after gym?

15 A. No. On Saturdays, they will leave the gym, and then  
16 they will get food in a box.

17 Q. Out of box. Okay.

18 A. They would leave, yes.

19 Q. So let's go to the next page. Continue on to the end.  
20 Just keep leafing through.

21 So is there any time that your, any time that  
22 anyone talked to you about signing your name?

23 A. No.

24 Q. Did you at any time get a bill for, for services from  
25 anybody?

1 A. No.

2 Q. All right. Did anyone talk to you that they give, they  
3 give you something that you, they give you food, your kids  
4 food and you owe them money?

5 A. No.

6 Q. All right. Do you know -- let's look at, let's look at  
7 the Y17.

8 So this is Empress, the Empress Watson that you  
9 talked, you've talked about, correct?

10 A. Yes.

11 Q. And he trained at your gym, correct?

12 A. Yes.

13 Q. Do you know one way or another whether he was the one  
14 organizing that meal be delivered, do you know?

15 A. I don't.

16 Q. You don't know. You just know food was given out,  
17 right?

18 A. Correct.

19 Q. Okay. Now, let's go to Y1. And that's a surprising  
20 picture. This is Ms. Bock, right?

21 A. Yes.

22 Q. And did Ms. Bock ever come inside your gym?

23 A. Yes.

24 Q. How many times?

25 A. Few times.

1 Q. All right. When Ms. Bock came inside your gym, did she  
2 ever talk to you that she wanted you personally or your club  
3 to be part of the meal program?

4 A. No.

5 Q. No. But you now see SIR Boxing Club, correct?

6 A. Yes.

7 Q. Have you ever received any notification from MDE saying  
8 that SIR Boxing Club billed MDE for any amount of money?

9 A. No.

10 Q. Okay. So let's go to P6. Next page. So highlight  
11 program name.

12 All right. So did you ever get any money from  
13 MDE?

14 A. No.

15 Q. All right. It's about 20 pages. Ms. Mallet, I want you  
16 to just scroll down, you know, a bit, as quick as you can.

17 So stop at this. We talked about the site  
18 information. You testified earlier. Highlight Section 1.

19 All right. Your name is not SIR Boxing, is it?  
20 It's just your business location, correct?

21 A. Correct.

22 Q. All right.

23 A. But -- yeah.

24 Q. Let's go to the next. Continue. Go back to the map.

25 Do you know what that is?

1 A. No.

2 Q. No. Okay. Is it, is it -- there's testimony that  
3 that's a site location.

4 MR. EBERT: Objection, Your Honor. Beyond the  
5 scope and beyond his personal knowledge.

6 THE COURT: Sustained.

7 MR. UDOIBOK: All right. I'll move on.

8 BY MR. UDOIBOK:

9 Q. So there's SIR Boxing. Do you see the address, for  
10 press release, immediate release, rather? All right. Do  
11 you see that part?

12 A. Yes.

13 Q. And you testified that sometimes the kids will be given  
14 food, right?

15 A. Not out of Suite E.

16 Q. Okay. But where was it? Outside, right?

17 A. Outside, as they leave the gym and go upstairs and they  
18 would get the food. What suite was that?

19 Q. Do you know, do you know how the kids knew food was  
20 given upstairs?

21 A. Because there was individuals getting food from outside,  
22 just food given.

23 Q. Okay. Let's go to the next page. Now stop.

24 So you testified that you weren't aware of civil  
25 rights training, right, given on July 28, 2020, right?

1 A. Yes. At SIR Boxing Club I was not aware of that.

2 Q. Okay. But who, whose name is printed on the --

3 A. SIR Boxing.

4 Q. Is it possible that the training was given in the Arcade  
5 structure and not specifically at your club location?

6 A. Well, why is my club location is, why is it SIR Boxing  
7 though?

8 Q. It's just the name.

9 A. Because the building.

10 Q. Yeah, it's a big building, right?

11 A. I don't understand why, why my address and my suite and  
12 my, the club be, be the location if it wasn't a location?

13 Q. What I'm saying, my question is, you agree that folks  
14 know?

15 A. Yes. The building is that big, but it's never -- why  
16 and the suite I use, why is it my location?

17 Q. I understand.

18 A. That's my frustration. I don't understand. I don't  
19 understand why is it my location.

20 Q. I understand.

21 A. My, you know, my suite. Because if there's other, you  
22 know, suites, what's the other suite? What suite? Was it  
23 upstairs? What was that upstairs?

24 Q. So, so, but let's just, let's just, you know, let me ask  
25 the questions. You try to answer. I know you frustrated

1 that you see your name here, correct? You're frustrated,  
2 right?

3 A. I just don't understand.

4 Q. I'm saying you are frustrated. I agree with you.  
5 You're frustrated your name is --

6 MR. EBERT: Objection, Your Honor. Argumentative.

7 THE COURT: Sustained.

8 MR. UDOIBOK: All right. Are you frustrated or  
9 not?

10 MR. EBERT: Objection, Your Honor. Argumentative.

11 THE COURT: Sustained.

12 THE WITNESS: I'm not, I can't say I'm frustrated.

13 THE COURT: No. I sustained it. You don't have  
14 to answer.

15 BY MR. UDOIBOK:

16 Q. So my question then is, is it possible this training  
17 occurred somewhere in the building? I'm not saying that it  
18 occurred at your suite, but in the building, is it possible?

19 A. Yes.

20 Q. Okay. But you agree with me that you're the most  
21 popular business at the Arcade, correct?

22 MR. EBERT: Objection.

23 THE WITNESS: Yes.

24 BY MR. UDOIBOK:

25 Q. Okay.

1 MR. EBERT: Lack of personal knowledge.  
2 Speculation.

3 THE COURT: It's been asked and answered a few  
4 times. I'm going to overrule that objection.

5 BY MR. UDOIBOK:

6 Q. All right. Let's go to the next page. Continue.  
7 Continue. Continue.

8 Sir, if you see a signature anywhere --

9 A. No.

10 Q. -- please stop me.

11 Go ahead. Okay. Now let's go to P7.

12 What do you see on the top right?

13 A. Arcade.

14 Q. It's called Arcade, right? It's no longer SIR Boxing,  
15 is it?

16 Okay. Let's continue. Go to the first page.  
17 Stop there. And highlight the site, the site.

18 What is it called?

19 A. Arcade.

20 Q. Is it still SIR Boxing?

21 A. No.

22 Q. It's not SIR Boxing. Who is the supervisor? Do you  
23 know who that is?

24 A. No.

25 Q. But you testified that at least food was at some point

1 being delivered in this area.

2 I'm sorry. Let's go to P8.

3 What name is on there?

4 A. Arcade.

5 Q. Arcade also.

6 And let's go to the next page.

7 Highlight the site, the first two lines, straight  
8 throughout.

9 And what's the site name?

10 A. Arcade.

11 Q. All right. And who is the supervisor?

12 A. I don't know.

13 Q. You don't know. Okay. You never met him. You never  
14 seen this document before?

15 A. No.

16 Q. All right. And you don't know why it changed from SIR  
17 Boxing to Arcade, do you?

18 A. No.

19 Q. Okay. So you just assuming -- are you, are you, are you  
20 considering that SIR Boxing is being used now in Exhibit P8?

21 MR. EBERT: Objection, Your Honor. First of all,  
22 it misstates his testimony. Assumes facts not in evidence.  
23 Calls for speculation.

24 THE COURT: Sustained.

25

1 BY MR. UDOIBOK:

2 Q. All right. You see the site name Arcade, correct?

3 A. Correct.

4 Q. Is it SIR Boxing?

5 A. No.

6 Q. Okay. Let's go to P10. Again highlight, call out.

7 Is it SIR Boxing?

8 A. No.

9 Q. Okay. All right. Go to the first page. Call out the  
10 site and the other --

11 Is it Arcade again?

12 A. Yes.

13 Q. Yes. And it's not SIR Boxing, correct?

14 A. Correct.

15 Q. All right. Go to page 7. Call out Feeding Our Future,  
16 as well as site. There you go.

17 Is it SIR Boxing?

18 A. No.

19 Q. All right. And you don't know who the Ardo Guled is, do  
20 you?

21 A. No.

22 Q. And go to the signature page please.

23 This is not your signature, is it?

24 A. No.

25 Q. Okay. Ms. Mallet, go to page 9. Call out Star

1 Distribution.

2 Do you own a business called Star Distribution?

3 A. No.

4 Q. All right. And call out bill to.

5 Do you see Arcade? Do you see that?

6 A. Yes.

7 Q. Is that Star -- is that SIR Boxing Club?

8 A. No.

9 Q. All right. What address is on?

10 A. 3055 Old Highway.

11 Q. Is that your address?

12 A. No.

13 Q. All right.

14 A. Minneapolis.

15 Q. All right. Sir, let me just make sure. No one gave you  
16 money, correct?

17 A. No.

18 Q. No one gave you a bill, correct?

19 A. No.

20 Q. Never heard from MDE?

21 A. No.

22 Q. And you never -- no one has said you were responsible  
23 for anything regarding the food program, correct?

24 A. No.

25 Q. All you know is SIR Boxing was used in some paperwork?

1 A. Yeah.

2 Q. Correct?

3 A. Correct.

4 Q. Thank you.

5 THE COURT: Mr. Colich or Mr. Montez, any  
6 questions?

7 MR. MONTEZ: No questions.

8 THE COURT: Mr. Ebert, redirect.

9 MR. EBERT: Thank you, Your Honor.

10 REDIRECT EXAMINATION

11 BY MR. EBERT:

12 Q. You were asked a series of questions just now about your  
13 business SIR Boxing. Can you remind the jury how long  
14 you've been involved in boxing?

15 A. Since I was, since I was 13 years old. That's when I  
16 first -- so 12 years old is when I walked into the gym. I  
17 started competing at 13 years old. Excuse me.

18 And I fast-forward my career, I turn pro after not  
19 making the Olympic team, losing at the, in Colorado Springs  
20 Olympic Training Center. Then I turn pro 2009, FSN, Fox  
21 Sport Network follow me, and I kept going.

22 Fast-forward that, retirement. I stopped, slow  
23 down with boxing in 2000 -- around 2015 is when I opened up  
24 SIR Boxing Club.

25

1 BY MR. EBERT:

2 Q. Is it fair to say boxing is important to you?

3 A. Yes.

4 Q. It matters to you?

5 A. Yeah, boxing is a lifestyle. Boxing is, yeah.

6 Q. And is it fair to say it matters so much to you that  
7 you've started your own gym?

8 A. Yes.

9 Q. Your own gym focused exclusively on boxing?

10 A. Yes, to where it is not just so much about me more, but  
11 it's more so, it was for the kids.

12 Q. And that's what you do?

13 A. And just everyone, you know, for everyone.

14 Q. And that's what you've been doing in building your own  
15 boxing gym, right?

16 A. Yes.

17 Q. For the kids?

18 A. Yes.

19 Q. Six days a week?

20 A. Yes.

21 Q. Week after week?

22 A. Yes.

23 Q. Month after month?

24 A. Yes.

25 Q. For over ten years now; is that right?

1 A. Yes, even, even prior before that, you know, I was, you  
2 know -- I've been doing this. Even as a professional, as a  
3 fighter, I trained and work with a lot of my peers. You  
4 know, you get those coming in the gym that don't know  
5 nothing. I'm trying to help them and gear them into learn  
6 the sport.

7 Q. So you built that gym?

8 A. Yes.

9 Q. We've now looked at documents where your business's  
10 name, your gym, SIR Boxing, was being used time and time  
11 again.

12 Did we just see those documents?

13 A. Yes.

14 Q. Your gym being used in documents submitted to the State  
15 of Minnesota. Do you remember seeing those?

16 A. Mm-hmm.

17 Q. What is your reaction that your business, your gym, SIR  
18 Boxing, was being used in that way by others?

19 A. You know, it's very awful. You know it's very, very  
20 awful. It's significant. I mean you, you know, because  
21 someone like what I'm doing in the community, you know, for  
22 the kids and the youth, for everyone, in opening doors, you  
23 know, and, you know, you never want it to be tarnished or be  
24 looked at as if it's not what it really perceive and what it  
25 really is.

1 Q. And to be clear, when I said "being used by others," we  
2 saw document after document that listed the name of Aimee  
3 Bock. Do you remember that?

4 A. Yes.

5 Q. Did you ever give Aimee Bock permission to use your  
6 business, your gym, SIR Boxing, in any of those documents?

7 A. No.

8 Q. You were also asked a couple questions, Mr. Fort, about  
9 whether you got money. Do you remember when you were just  
10 asked that a few moments ago?

11 A. Yes.

12 Q. I'm showing you Exhibit X1. And this has a list of  
13 different sites. And do you see where it says Feeding Our  
14 Future, Arcade? Do you see that highlighted in yellow?

15 A. Yes.

16 Q. So let's talk about money. Do you see where it lists  
17 \$1.8 million for that location? Do you see that?

18 A. Yes.

19 Q. Did you get \$1.8 million?

20 A. No.

21 Q. Do you know who did?

22 A. No.

23 Q. Did you get rich during the pandemic to the tune of  
24 \$1.8 million?

25 A. No. In fact, I had to close the gym down. I started

1 doing classes on Zoom. And, you know, which brought in  
2 fairly not a lot of money, but, you know, I mean that's  
3 neither here nor there.

4 Q. Not 1.8 million.

5 A. No. But that, like I say that -- so SIR Boxing, was SIR  
6 Boxing on that form there? That was Arcade again?

7 Q. That was Arcade.

8 A. Yes.

9 Q. All right. Now I want to show you a few more documents  
10 that you were just asked about. P6, which is, you see here  
11 it says Permanent File up in the upper right, Mr. Fort?

12 A. Yes.

13 Q. And throughout all of these documents that reference  
14 your business, do they, they all say Suite E on them next to  
15 1440 Arcade Street?

16 A. Yes, that say Suite E.

17 Q. And Suite E was your business, right, the one that you  
18 built?

19 A. Yes.

20 Q. And if we look at page 15 of this exhibit, this is one  
21 of those you've looked at involving the Minnesota Department  
22 of Education; is that right?

23 A. Right.

24 Q. And once again, do you see your business name, SIR  
25 Boxing Club?

1 A. Yes.

2 Q. It says it's submitted for approval, Suite E, 1440  
3 Arcade Street?

4 A. Yes.

5 Q. Underneath Feeding Our Future; is that right?

6 A. Yes.

7 Q. And in the upper right, do you see where there's some  
8 log in information?

9 A. Yes.

10 Q. And who is the person underneath log in information for  
11 Feeding Our Future?

12 A. Aimee Bock, sponsor, Feeding Our --

13 Q. And now, if we flash forward, do you see where it says  
14 August 17th, 2010 {sic}?

15 A. Yes.

16 Q. Once again, do you still see SIR Boxing Club is listed  
17 as a site?

18 A. 1440 Arcade Street, Suite E.

19 Q. And do you see SIR Boxing Club highlighted in yellow?

20 A. Yeah.

21 Q. It's still your same address, right?

22 A. Yes.

23 Q. Suite E?

24 A. Yes.

25 Q. And then a name is just changed to call it this Feeding

1 Our Future, Arcade; is that right?

2 A. Could I see something? Could you go back to -- can I  
3 see the before screen? It says change have been accepted.  
4 Changes have been accepted.

5 Q. Do you know about any changes? Did you do that?

6 A. No.

7 Q. Okay. And to be clear, this is still your exact same  
8 address, is that right, Suite E?

9 A. Yeah, Suite E. So that was no changes. It was still  
10 the same.

11 Q. Is that your same address?

12 A. Yes.

13 Q. And in the upper right, again, do we see a person  
14 underneath the log in information?

15 A. Yes.

16 Q. Who is it?

17 A. It says name Aimee Bock.

18 Q. Now, you mentioned you saw meals being delivered on  
19 Saturdays; is that right?

20 A. Yes.

21 Q. But you never saw 2,500 meals being delivered on  
22 Saturdays, did you?

23 A. No, I didn't see.

24 Q. Anything close to that?

25 A. That I didn't see. When I came -- I went upstairs, and

1 I would leave the gym. I would leave, and it would be cars  
2 outside. There was people outside.

3 Q. But you never saw a population larger than your high  
4 school getting food at that building, did you?

5 A. No, I didn't stay, and I didn't watch. And, yeah, so I  
6 would leave.

7 Q. Is that a type of thing you would have known about at  
8 your building if a population larger than your high school  
9 descended there to get food?

10 A. Possibly so.

11 Q. And you never saw that?

12 A. No. I didn't see it, no.

13 Q. And you never heard about that?

14 A. I didn't hear about it, no. Until now.

15 Q. And then on your screen, Mr. Fort, is another document,  
16 page 5 of Exhibit V4.

17 Do you see where it says Sponsor Name Feeding Our  
18 Future?

19 A. Yes.

20 Q. And once again using your business there, SIR Boxing?

21 A. Yes.

22 Q. Which you didn't know about, did you?

23 A. No, I didn't at all.

24 Q. Did you authorize it?

25 A. No.

1 Q. And down below do you see where it says that the, "SIR  
2 Boxing site manager will staff the site."

3 Did I read that correctly?

4 A. Yes.

5 Q. And who does it indicate is supposedly the site monitor  
6 for giving food to kids at your business, SIR Boxing?

7 A. Aimee Bock.

8 Q. And did you ever see her in that capacity as --

9 A. No.

10 Q. Never?

11 A. No.

12 MR. EBERT: Thank you, Your Honor.

13 THE COURT: Mr. Udoibok, do you have recross?

14 MR. UDOIBOK: Yes.

15 RECROSS-EXAMINATION

16 BY MR. UDOIBOK:

17 Q. Ms. Mallet, would you call up X1. Call out Feeding Our  
18 Future, Arcade. Feeding Our Future, Arcade.

19 Do you see Feeding Our Future, Arcade?

20 A. Yes.

21 Q. Is it, is that SIR Boxing?

22 A. No.

23 Q. Okay. Go to P6, Ms. Mallet. Go to page 18. And that  
24 page. I want at the top of that page. Go to the first  
25 page. I mean go back. Scroll down. Scroll down. Stop.

1 Just a second. Keep on. Keep on going.

2 There's a document I'm looking for that came in  
3 during your cross.

4 Keep on going. I think it's on page 18. Not so  
5 fast. Stop. Stop. Go down a little bit. Just a second.

6 Your Honor --

7 All right. I believe you noticed -- highlight  
8 changes have been accepted.

9 Do you see that?

10 A. Mm-hmm. Yes.

11 Q. That's a yes. Okay. And what time period is this? If  
12 you look at the date, it is stamped August 17, 2021,  
13 correct?

14 A. Yeah.

15 Q. All right. And then I want to see. Do you see the site  
16 name? Do you see that? It's SIR Boxing?

17 And then go further down. There's the address.  
18 And then go further down. Go further down.

19 I want the site name. The change. The change  
20 site name. All right.

21 So you see the program site program name. Call  
22 out that.

23 What is it now?

24 A. 14.

25 Q. Site program name is what?

1 A. Site application submitted for approval.

2 Q. What is that?

3 A. Feeding Our Future, Arcade.

4 Q. It says what? Feeding Our Future, Arcade, right?

5 A. If you look at the site address, it's still Suite E.

6 Q. I realize that but what is the --

7 MR. EBERT: Objection. Asked and answered.

8 THE COURT: Sustained. It's asked and answered.

9 THE WITNESS: The address --

10 THE COURT: Hang on. It's asked and answered.

11 You don't need to answer any more. Thank you.

12 BY MR. UDOIBOK:

13 Q. So the change has been accepted?

14 MR. EBERT: Lack of foundation.

15 THE COURT: Sustained.

16 BY MR. UDOIBOK:

17 Q. Okay. So if, if, would it surprise you that Feeding Our  
18 Future wanted to change --

19 MR. EBERT: Objection. Assumes facts in evidence.  
20 It calls for speculation.

21 THE COURT: Sustained.

22 Mr. Udoibok, you can't testify.

23 MR. UDOIBOK: May I approach, Your Honor?

24 THE COURT: You may.

25 **(Sidebar discussion)**

1 THE COURT: Mr. Udoibok.

2 MR. UDOIBOK: Yes, Your Honor. May I? Okay.

3 The government has elicited testimony specifically  
4 relating to P6 and meal counts from this witness. And  
5 hearsay evidence have been allowed to be entered.

6 THE COURT: I didn't hear any hearsay objections.

7 MR. UDOIBOK: Well, but nonetheless, nonetheless,  
8 A75, A75 is evidence, exhibit that is already in evidence,  
9 testified to by witnesses other than Aimee Bock. And  
10 specifically Exhibit 75 clarifies what --

11 THE COURT: Is 75 the CLiCS? I'm sorry.

12 MR. UDOIBOK: No. 75 is an email, email from  
13 Aimee Bock to MDE about, it specifically about SIR Boxing  
14 Club and the name change. And it's already in evidence.

15 I want to ask whether, what his reaction would be  
16 if he finds out that in the government exhibit that the  
17 jury's already seen that SIR Boxing was never started with  
18 FOF, and it had to do with naming the, naming the location  
19 where food has been delivered.

20 THE COURT: Okay. Mr. Ebert.

21 MR. EBERT: So, Your Honor, a few points.

22 First of all, it's I think clear to the court, to  
23 the jury, Mr. Fort is a, is a boxer who operated the gym.  
24 The questioning of him has been cabined to what he observed,  
25 what he knew, what he's seen on these documents that

1 directly relates to what he does know, which is the name of  
2 his business and his business address.

3 Mr. Udoibok I think is improperly attempting to  
4 just refashion it to ask him to speculate about internal  
5 machinations about bureaucratic paperwork and MDE processes  
6 that are far beyond his personal knowledge.

7 He's asking him essentially to opine and to get  
8 reactions on things that he has no personal knowledge of,  
9 and so it's multiple problems with these types of questions  
10 that Mr. Udoibok is persisting in.

11 This witness just isn't a witness who knows  
12 anything about it, and they're really more being fashioned  
13 as arguments that I understand Ms. Bock hopes to make, wants  
14 to impart, but I don't think this is the proper vehicle to  
15 do it through this witness in this way.

16 THE COURT: Any changes that the MDE made, if he  
17 doesn't know about them, he can't testify about them. And  
18 you testifying about them and asking for his reaction is  
19 improper.

20 It may well be an avenue of argument, but it isn't  
21 proper for this witness.

22 MR. UDOIBOK: Your Honor, may I, just for the  
23 record?

24 THE COURT: Of course.

25 MR. UDOIBOK: The witness has been asked about the

1 use of his name, SIR Boxing, by the government. And also in  
2 evidence is that Arcade has been used. That's in evidence.

3 But specifically Exhibit A75 has already been  
4 entered into evidence, and the jury has seen it. And  
5 there's testimonies about Exhibit 75.

6 All I want is to ask the witness to see his  
7 reaction as to what paragraph 3(a), just one sentence or two  
8 sentence, SIR Boxing never started with FOF. There is a  
9 different nonprofit that is operating in the multi building  
10 at this site.

11 THE COURT: If that's true and he knows it, he can  
12 testify about it, but he has said he doesn't know it.

13 MR. UDOIBOK: Judge, he testified that the food  
14 been given from another business upstairs on the same  
15 property.

16 THE COURT: So what is it that you want to ask  
17 him?

18 MR. UDOIBOK: Well, that SIR Boxing was never a  
19 part of Feeding Our Future.

20 THE COURT: That's not a question. That's a  
21 statement. What do you want to ask him?

22 MR. UDOIBOK: What is his reaction to that SIR  
23 Boxing was never, was never started with FOF and there is  
24 no -- there is a different nonprofit operating in the multi  
25 unit building at the time.

1 THE COURT: It's not proper under the Rules of  
2 Evidence.

3 (In open court)

4 THE COURT: The objection is sustained.

5 BY MR. UDOIBOK:

6 Q. One more question. Do you know whether the person that  
7 was distributing food upstairs, whether the person or the  
8 business was using the name Feeding Our Future, Arcade?

9 A. No, I do not know.

10 Q. Okay. And do you know whether that entity was a  
11 for-profit or a nonprofit?

12 A. I don't know.

13 Q. All right. Do you know --

14 A. But.

15 Q. Go ahead.

16 A. I would assume nonprofit because, like I said, the kids  
17 would go upstairs and get food. They didn't pay for it.

18 Q. Yeah.

19 A. So --

20 Q. I just want to make sure. And as you sit here today, do  
21 you know the communication that Ms. Bock had with MDE,  
22 Minnesota Department of Education, regarding the nonprofit  
23 upstairs?

24 MR. EBERT: Objection.

25 THE WITNESS: I don't, no.

1 MR. EBERT: Foundation. Beyond the scope.

2 THE COURT: Overruled.

3 You can answer that question, which is do you  
4 know.

5 THE WITNESS: No.

6 BY MR. UDOIBOK:

7 Q. All right. You just concerned that you saw your name,  
8 not your name, SIR Boxing being used in paperwork here,  
9 correct? That's it?

10 A. Yes.

11 MR. UDOIBOK: No further questions.

12 THE COURT: Mr. Ebert, anything?

13 MR. EBERT: No, Your Honor. Thank you.

14 THE COURT: You may step down, sir. Thank you.

15 And the government may call its next witness.

16 MR. BOBIER: Your Honor, the government calls  
17 Jamie Phelps.

18 THE COURT: I'm sorry. Could you ask Jamie Phelps  
19 to hold on? It's 10:30, and we need to take a break.

20 MR. BOBIER: No problem.

21 THE COURT: We will come back at 10:45, everyone.

22 All rise for the jury.

23 10:28 a.m.

24 **IN OPEN COURT**

25 **(JURY NOT PRESENT)**

1 THE COURT: We're in recess until 10:45.

2 (Recess taken at 10:29 a.m. till 10:49 a.m.)

3 10:49 a.m.

4 **IN OPEN COURT**

5 **(JURY PRESENT)**

6 THE COURT: You may all be seated.

7 And the government may now call its next witness.

8 MR. BOBIER: Thank you, Your Honor. The

9 government calls Jamie Phelps.

10 THE COURT: Good morning, sir. Come on up here to

11 take the oath. Would you raise your right hand?

12 JAMIE PHELPS,

13 called on behalf of the government, was duly sworn, was

14 examined and testified as follows:

15 THE WITNESS: I do.

16 THE COURT: Thank you. You may be seated.

17 And when you are settled there, could you state

18 and spell both your first and last name for the record.

19 THE WITNESS: Jamie Phelps, J-A-M-I-E P-H-E-L-P-S.

20 THE COURT: Thank you.

21 Mr. Bobier, you may inquire.

22 MR. BOBIER: Thank you, Your Honor.

23 DIRECT EXAMINATION

24 BY MR. BOBIER:

25 Q. Good morning, Mr. Phelps.

1 A. Good morning to you.

2 Q. How are you doing today?

3 A. Pretty good. How about yourself?

4 Q. Okay. I would like to ask you a few questions about  
5 your background to give the jury an opportunity to learn a  
6 little bit about you, if that's okay.

7 A. Yep.

8 Q. How old are you, sir?

9 A. 49.

10 Q. Where are you from?

11 A. St. Paul.

12 Q. Born and raised?

13 A. Yes, sir.

14 Q. Still live in the St. Paul area?

15 A. Correct.

16 Q. How far did you go in school?

17 A. Highest I was at the School of Business for  
18 entrepreneurship.

19 Q. Entrepreneurship?

20 A. (Moves head up and down.)

21 Q. And what did you do for work after you left school?

22 A. Mechanic.

23 Q. How long have you been a mechanic?

24 A. My entire life.

25 Q. How many years is that, not your entire life, working as

1 a mechanic?

2 A. 25 years.

3 Q. What sort of mechanic are you? What do you work on?

4 A. Heavy equipment, all the way down to a golf cart.

5 Q. Full range?

6 A. Full range.

7 Q. As a mechanic, where do you work currently?

8 A. City of Eagan.

9 Q. Of Eagan?

10 A. Yes.

11 Q. That's here in Minnesota; is that right?

12 A. Correct.

13 Q. How long have you worked as a mechanic for the City of

14 Eagan?

15 A. Ten years I've been at the City of Eagan.

16 Q. And at the City of Eagan, what sorts of work do you do

17 as a mechanic day in, day out?

18 A. We take care of lawnmowers. I now work for the Parks

19 and Rec, so I take care of their equipment.

20 Q. You like it there?

21 A. Yeah, I love it there.

22 Q. How long have you been in Eagan? You say ten years?

23 A. Ten years.

24 Q. Good stretch?

25 A. Yeah.

1 Q. Mr. Phelps, do you know the name Aimee Bock?

2 A. I do.

3 Q. How do you know that name?

4 A. She's a friend of my neighbor's.

5 Q. A friend of your neighbor's, you said?

6 A. Correct.

7 Q. Who is that neighbor?

8 A. Coley Flynn.

9 Q. How long has Coley Flynn been your neighbor?

10 A. About 15 years.

11 Q. 15 years. How close does Coley Flynn live to where you  
12 live?

13 A. A lot over.

14 Q. Sort of like next door?

15 A. Next door, yeah.

16 Q. And how well do you know Coley?

17 A. He moved in 15 years ago.

18 Q. Reasonable stretch for a neighbor.

19 A. Yeah.

20 Q. How through Coley did you come to meet Aimee Bock?

21 A. I think they worked together.

22 Q. Okay. When was the first time that you remember meeting  
23 Aimee Bock?

24 A. Bonfire in the back of Coley's yard.

25 Q. Can you describe the bonfire for us?

1 A. Firewood, beers.

2 Q. I'm sorry. Can you describe the event? I guess I'm --

3 A. Exactly a bonfire. Bonfire, standing around, having  
4 beers.

5 Q. Couple folks from the neighborhood?

6 A. Yeah.

7 Q. So you said that was on Coley's lot; is that correct?

8 A. Correct, in his backyard.

9 Q. And to your recollection, why was Aimee Bock at this  
10 bonfire with the --

11 A. Coley and her were coworkers.

12 Q. Do you know what kind of work they did together?

13 A. I had -- I don't know. Somewhere on Rice Street.

14 Q. Okay. Do you know how long ago this was? Was it pre or  
15 post COVID?

16 A. It was before COVID.

17 Q. Do you know how long before?

18 A. A year or two. I don't know. COVID kind of melts your  
19 brain on time.

20 Q. You are not alone on that. So you met Ms. Bock at this  
21 bonfire at Coley Flynn's backyard sometime before COVID; is  
22 that right?

23 A. Correct.

24 Q. You said you understood that they worked together?

25 A. Yes.

1 Q. Was it your understanding at the time that they then or  
2 thereafter had another part of their relationship?

3 A. I found out that they have been hanging out, I guess,  
4 romantically or dating. I don't know if they would, either  
5 one would say they were or they weren't.

6 Q. But you don't know much of the details of that?

7 A. I don't.

8 Q. So how many times in total have you spoken with Aimee  
9 Bock?

10 A. A handful of times.

11 Q. Fewer than five, do you think?

12 A. Right around there.

13 Q. And on the occasions you'd speak with her, where was it?  
14 Was it always at a bonfire at Coley's?

15 A. It would be at a bonfire or if we met them out at a  
16 local public.

17 Q. In the area?

18 A. In the area yes.

19 Q. Which pubs might you go to?

20 A. Grand 7. Back then it was called -- what was it called?  
21 Lucky Fox. I don't know. It had a couple different names.

22 Q. But that was over in St. Paul?

23 A. Correct. Yes. All in St. Paul. All in the  
24 neighborhood.

25 Q. So you said you met Aimee Bock sort of through your

1 neighbor at these casual events a handful of times.

2 Mr. Phelps, how well do you know Aimee Bock?

3 A. As well as I know you.

4 Q. And how many times have we talked?

5 A. Under five. Around five.

6 Q. Okay. In those under five times that you spoke with  
7 Aimee Bock, did she ever ask you to join a board of an  
8 organization?

9 A. She said she was going to -- she, when she got let go of  
10 whatever job was on Rice Street, she said she wanted, she  
11 needed board members because she wanted to do it herself.

12 Q. Okay. What did she tell you about the company she was  
13 thinking about starting?

14 A. Never got that far.

15 Q. How long was this conversation, do you think?

16 A. Probably as long as that last question you asked me.

17 Q. During that conversation, did Aimee Bock tell you the  
18 name of the company she was thinking about starting?

19 A. No.

20 Q. During this conversation, did she ask if you had any  
21 experience in accounting?

22 A. No, not at all.

23 Q. Or any advanced education in finance?

24 A. No, not at all.

25 Q. During this conversation when Aimee Bock asked you to

1 join a board for a company she was starting, did she ask if  
2 you had any experience serving on a board before?

3 A. No.

4 Q. Or any experience working in nonprofits?

5 A. No.

6 Q. How about any experience handling a large budget?

7 A. No.

8 Q. What did she ask you?

9 A. Would you be a board member.

10 Q. That's about it?

11 A. That's it.

12 Q. She explain what your role might be?

13 A. No.

14 Q. What your responsibilities might be?

15 A. No.

16 Q. What the mission or task of the company she was thinking  
17 about founding would be?

18 A. No.

19 Q. Was this conversation at one of those bonfires in Coley  
20 Flynn's backyard as you've described?

21 A. Yes, it was.

22 Q. And what did you respond when Ms. Bock asked if you'd  
23 join a board?

24 A. I said yes.

25 Q. Why did you say yes?

1 A. Because I don't -- I was trying to help. I don't know.  
2 She needed board members.

3 Q. Said you'd do it.

4 A. Yeah.

5 Q. Did you ever speak with Ms. Bock about that again?

6 A. No.

7 Q. Did she ever bring it up the other two or three times  
8 you met her?

9 A. No.

10 Q. Did she ever send you emails about participating on the  
11 board that she'd mentioned?

12 A. I have never received an email from her, no.

13 Q. Did she ever send you any mail about participating on a  
14 board of that organization?

15 A. I have never received a piece of mail from her.

16 Q. Now, sitting here today, Mr. Phelps, do you know what  
17 company it was that she founded?

18 A. Now I do.

19 Q. And what is that?

20 A. Feeding our friends, I guess. I don't know exactly.

21 Q. She didn't tell you at the time, right?

22 A. No.

23 Q. Did you file any paperwork to start that company with  
24 her?

25 A. I did not.

1 Q. Did you sign any paperwork to start that company with  
2 her?

3 A. I did not.

4 Q. I'm going to show you Exhibit A3. It's in evidence.

5 Mr. Phelps, we're looking at a Feeding Our Future  
6 organizational chart. Do you see that?

7 A. I do.

8 Q. Do you have an idea about what an organizational chart  
9 is for a business?

10 A. I do not.

11 Q. Have you ever been on an organizational chart for a  
12 business, as far as you know?

13 A. I have not.

14 Q. Let's take a look at the very top rows here. And,  
15 first, do you see at the very top it says Feeding Our  
16 Future?

17 A. Yes.

18 Q. Is that your understanding of the company Ms. Bock ended  
19 up --

20 A. It is.

21 Q. Let me zoom in here.

22 All right. Mr. Phelps, do you see your name on  
23 this org chart?

24 A. I do.

25 Q. And what's your title?

1 A. It says treasurer.

2 Q. Were you the board treasurer for Feeding Our Future?

3 A. Not that I know of.

4 Q. Did you ever agree to be the board treasurer for Feeding  
5 Our Future?

6 A. By saying I would be on the board member, I didn't know  
7 that I would be treasurer.

8 Q. At one time --

9 A. Yeah.

10 Q. In that one conversation?

11 A. That one conversation.

12 Q. And you told us you don't have an accounting background,  
13 right?

14 A. I do not.

15 Q. Do you think you would be well suited to be a board  
16 treasurer for a large nonprofit?

17 A. I'm going to say no.

18 Q. Not your background; is that right?

19 A. Just because I wouldn't know what I would be doing.

20 Q. What about being the treasurer for a company responsible  
21 for \$200 million? Do you think that would be something you  
22 would be well suited for?

23 A. No.

24 MR. UDOIBOK: Objection. Calls for speculation.

25 THE COURT: Overruled.

1                   You may answer.

2                   THE WITNESS: No.

3 BY MR. BOBIER:

4 Q. Why not?

5 A. Again, it's like I would be a Fish out of water. I  
6 don't know what I'm doing.

7 Q. Mr. Phelps, do you see that there's a, a row beneath the  
8 board members here. Do you see that on Government's A3?

9 A. I do.

10 Q. And underneath the board there's an executive director.  
11 Do you see that?

12 A. I do.

13 Q. What's the name written there?

14 A. Aimee Bock.

15 Q. Did you ever supervise Aimee Bock at Feeding Our Future?

16 A. I did not.

17 Q. Did you oversee her conduct?

18 A. I did not.

19 Q. Did you approve or review her actions as executive  
20 director at Feeding Our Future?

21 A. I never have.

22 Q. You work with Feeding Our Future at all?

23 A. I have never worked with Feeding Our Future with  
24 anything.

25 Q. A few more names up here.

1                   It says Board President. The name is Benjamin  
2 Stayberg. Do you see that?

3           A. I do.

4           Q. Do you know a Benjamin Stayberg?

5           A. I do.

6           Q. How do you know him?

7           A. He is a bartender at one of the pubs in St. Paul.

8           Q. One of the pubs you used to go to sometimes?

9           A. Correct.

10          Q. One of the pubs you've described you might have had one  
11 of those five brief conversations with Ms. Bock?

12          A. Yes.

13          Q. If you were starting a nonprofit, Mr. Phelps, would you  
14 select Benjamin Stayberg to be the board president?

15                   MR. UDOIBOK: Objection. Calls for speculation.

16                   THE COURT: Overruled.

17                   You may answer.

18                   THE WITNESS: Ben's a great guy. I don't think I  
19 would want him to be president of anything of mine.

20                   BY MR. BOBIER:

21          Q. And why is that?

22          A. It's not his background.

23          Q. Not what he's well suited for?

24          A. Correct.

25          Q. And what is his background?

1 A. Well, I know he's a bartender.

2 Q. There's also a name for board secretary on that org  
3 chart. Do you see that?

4 A. I do.

5 Q. That name is John Senkler?

6 A. Correct.

7 Q. Do you know John Senkler?

8 A. I do know John Senkler.

9 Q. How do you know him?

10 A. He's also a bartender at the local pub.

11 Q. Same area in St. Paul we've been talking about?

12 A. Same area in St. Paul, yep. Known him maybe 15,  
13 20 years.

14 Q. Is John Senkler the sort of person you would choose as  
15 your board secretary if you were starting a nonprofit?

16 A. John is also a good guy. I will not want him on my  
17 board either.

18 Q. Why is that?

19 A. It's not his, not in his wheelhouse.

20 Q. What does that mean?

21 A. I don't know. How do I say it? I just -- I wouldn't  
22 want him in charge of my piggy bank.

23 Q. Let me show you A5. It's also in evidence.

24 It's an email. We'll come back to the top in a  
25 moment, but I want to go down to page 4, which is one of the

1 attachments. Okay?

2 And at the top of this attachment on A5, you see  
3 that this is a State of Minnesota document?

4 A. I do.

5 Q. It says Charitable Organization Initial Registration  
6 Form; is that right?

7 A. Yes.

8 Q. The Minnesota Attorney General's Office?

9 A. Yes.

10 Q. And Section A of this document we see a name of an  
11 organization. What is that?

12 A. Feeding Our Future.

13 Q. And there's some contact information for Feeding Our  
14 Future; is that right?

15 A. There is.

16 Q. What's the name?

17 A. It says Aimee Bock.

18 Q. And there's an email address also?

19 A. Yes.

20 Q. Aimee@feedingourfuturemn.org?

21 A. That is correct.

22 Q. If we go down to page 9 of the same document -- excuse  
23 me. Let's go to page 5 first.

24 All right. So we're in the same document, and  
25 here in paragraph 9 there's a little more information. The

1 form asks for the address of the principal office in  
2 Minnesota; is that right?

3 A. Yes, that's what it says.

4 Q. And there's a name for the contact person?

5 A. Yes.

6 Q. Who is that on this form?

7 A. It says Aimee Bock.

8 Q. There's an address given in Rosemount; is that right?

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

10 Q. Do you recognize that address?

11 A. I don't know anything about that address.

12 Q. Go down a little farther in the document. Paragraph 10  
13 asks to explain in detail the organization's charitable  
14 purposes. Do you see that?

15 A. I do.

16 Q. Can you read to us what's written there?

17 A. It says sponsor of the USDA Child and Adult Care. It  
18 says full or food program. We also train and consult in  
19 early childhood programs.

20 Q. All right. Mr. Phelps, do you have any experience with  
21 the Child and Adult Care Food Program?

22 A. No, I do not.

23 Q. Before today, had you ever heard of the CACFP?

24 A. I have never heard of that.

25 Q. You ever participated in any training and consulting

1 with early childhood programs?

2 A. I have not.

3 Q. Ever done anything like that?

4 A. I have not.

5 Q. Go down two pages later. There's a Section C. It says,  
6 "Board of Directors Signatures and Acknowledgement," is that  
7 right?

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

9 Q. You remember the org chart we looked at a moment ago  
10 with you as one of the board members?

11 A. Yes.

12 Q. And down here at the bottom of this State of Minnesota  
13 document, we see your name again?

14 A. We do.

15 Q. Is that your name?

16 A. That is my name.

17 Q. It says Treasurer. Were you the treasurer for Feeding  
18 Our Future?

19 A. I was not.

20 Q. And there's a signature there?

21 A. There is.

22 Q. Is that your signature?

23 A. That is not my signature.

24 Q. Did you sign this document?

25 A. I did not sign this document.

1 Q. You ever give anyone permission to sign it for you?

2 A. No, I did not.

3 Q. Did you ever give Ms. Bock permission to sign it for  
4 you?

5 A. I did not.

6 Q. Let's go to page 12 of the same program or rather same  
7 set of attachments to that email we started with.

8 Part of this form identifies the program's  
9 responsible principals. Do you see that?

10 A. Yes, I do.

11 Q. There are a few names here. One of them is Ben Stayberg  
12 who we just talked about.

13 A. Yep.

14 Q. And right on top here you are again, Jamie Phelps.

15 A. That's me.

16 Q. What do you, what is your reaction to seeing your name  
17 as a program responsible principal on this Feeding Our  
18 Future form?

19 A. I don't know. I don't know anything about it, so -- I  
20 mean, I mean I am here, so I have those feelings.

21 Q. You are here, so you have those feelings?

22 A. Yeah, I've -- my name is on a sheet that I've never seen  
23 before, and I'm in the front of a federal court. That's  
24 kind of an odd feeling.

25 Q. Not a great feeling?

1 A. No.

2 Q. Let me go back to page 1. All of those attachments we  
3 were looking at in Government's A5, they are attached to an  
4 email.

5 Who is that email from, Mr. Phelps?

6 A. From Aimee Bock.

7 Q. Submitted to some entity at the state government; is  
8 that right?

9 A. State of Minnesota, yes. That's what it looks like.

10 Q. Let me show you A29, which is in evidence.

11 Another email; is that right?

12 A. That's what it looks like to me.

13 Q. This one also from Aimee Bock?

14 A. That's what it says.

15 Q. All right. So the email in this one, date June of 2020.  
16 Did I read that right?

17 A. Yes.

18 MR. UDOIBOK: Objection. Hearsay.

19 THE COURT: Overruled.

20 BY MR. BOBIER:

21 Q. And what does Ms. Bock write in the body of this email?

22 MR. UDOIBOK: Objection. Hearsay, Your Honor.

23 THE COURT: Overruled.

24 THE WITNESS: "Attached is the information for  
25 myself, as well as our board of directors. They volunteer

1 an average of one to two hours per month. Thanks, Aimee."

2 BY MR. BOBIER:

3 Q. And we can see in the attachment similar looking form  
4 from Feeding Our Future on page 2. There you are again, one  
5 of the board members, right?

6 A. Yes, I guess.

7 Q. "I guess" meaning this is what the form says anyway?

8 A. Correct.

9 Q. Says you've been a board member since June 2018, right?

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

11 Q. We go down to the last page. That piece of paper that  
12 says you were the board treasurer for Feeding Our Future,  
13 attached to an email sent from Aimee Bock, do you see that  
14 there's a signature at the bottom of that page?

15 A. I do.

16 Q. Can you make out what that says?

17 A. I have no clue.

18 Q. Not your signature, is it?

19 A. No, it's not.

20 Q. Let me go back up to the first page. Were you  
21 volunteering one to two hours per month for Feeding Our  
22 Future around June of 2020?

23 A. I have never volunteered any time with Feeding Our  
24 Future.

25 Q. At all?

1 A. At all.

2 Q. Well, this is June of 2020. Let's go to October of  
3 2021. This is Government's A76, which is in evidence.

4 Another email from Aimee Bock; is that right?

5 A. That's what it looks like.

6 Q. The last one was June of 2020. So this is a year and  
7 change later; is that right?

8 A. Yes.

9 Q. She lists in this email a bunch of board members. Do  
10 you see that?

11 A. I do.

12 Q. Including Ben Stayberg who we've discussed?

13 A. Yes.

14 Q. Including Jamie Phelps who I think you said -- I'm  
15 sorry. You are Jamie Phelps; is that right?

16 A. That's me.

17 Q. And John Senkler who I think you said was a good guy but  
18 you wouldn't trust with your piggy bank?

19 A. Correct.

20 Q. So in June 2020 Aimee Bock's email says you are  
21 volunteering one to two hours a month. Now we're in October  
22 of 2021. It seems like your hours per month have gone up by  
23 quite a bit; is that right?

24 A. Yes.

25 MR. UDOIBOK: Objection. Hearsay.

1 THE COURT: Overruled. It's a statement of a  
2 party opponent.

3 BY MR. BOBIER:

4 Q. Is that right, Mr. Phelps?

5 A. It does look that way.

6 Q. And what does Ms. Bock say in this email as to how many  
7 hours per week you and the other board members she  
8 identifies there are supposedly volunteering?

9 A. Five or so.

10 Q. Not true?

11 A. I -- no, I haven't volunteered any hours.

12 Q. Not accurate.

13 I'm going to show you Government's A2. This is a  
14 file folder, scanned. It says Financial Year 2019 Board  
15 Training. Do you see that?

16 A. Yep.

17 Q. I'll take you to page 8.

18 All right. So at the top this says Feeding Our  
19 Future Procurement and Financial Recordkeeping Quiz; is that  
20 right?

21 A. Correct.

22 Q. Mr. Phelps, prior to you prepping for witness testimony,  
23 have you ever seen this document?

24 A. I have never seen this document.

25 Q. Have you ever taken something called a Procurement and

1 Financial Recordkeeping Quiz?

2 A. I have never taken that.

3 Q. Do you have any idea what that is?

4 A. No clue.

5 Q. Or what it's about?

6 A. No.

7 Q. Well, on the next page, the second page of that same

8 quiz, there's a printed name. Is that yours?

9 A. You got it. There I am again.

10 Q. Is it your signature?

11 A. No, it's not.

12 Q. Is it even close to what your signature looks like?

13 A. No.

14 Q. Did you sign that?

15 A. I did not sign that. I've never seen it before.

16 Q. Did you tell anyone they can sign it for you?

17 A. No, I did not.

18 Q. Here's another one in the same packet. What's this one

19 called?

20 A. Claims of Reimbursement Quiz.

21 Q. It looks like there's a true or false set of questions

22 at the top; is that right?

23 A. Yes.

24 Q. One of them asks about meal counts for meals and snacks

25 requested for reimbursement can be in excess of attendance

1 for the day in the classroom. It's a true or false  
2 question. Do you see that?

3 A. Yes, I do.

4 Q. Have you ever seen that question before?

5 A. I've never seen that question before.

6 Q. Do you even have any idea what it's asking?

7 A. No, I do not.

8 Q. There's a signature at the bottom of this one too; is  
9 that right?

10 A. There is.

11 Q. Sort of looks like the signature we just looked at on  
12 the other quiz?

13 A. It does resemble the last one, yes.

14 Q. Is it yours?

15 A. That is not mine.

16 Q. Did you tell anyone they could sign this?

17 A. No, I did not.

18 Q. I'm going to show you Government's A77.

19 MR. UDOIBOK: Your Honor, renew my objection.

20 Hearsay.

21 MR. BOBIER: It's an FOF tax filing, Your Honor.

22 THE COURT: Overruled.

23 BY MR. BOBIER:

24 Q. All right. Mr. Phelps, at the top of this document --  
25 let me ask you this: Have you ever filed your own taxes?

1 A. I have.

2 Q. Does this look generally like the kind of form you see  
3 when you are preparing your taxes?

4 A. It does.

5 Q. At the top it says the name of the organization for this  
6 financial year 2020 tax form is Feeding Our Future; is that  
7 right?

8 A. Yes.

9 Q. Lists an address on Old Highway 8. Do you recognize  
10 that address?

11 A. I've never seen that address before.

12 Q. Not a place you remember ever going to?

13 A. Never been there. Never seen it.

14 Q. Could you tell us what name is on this A77 at page 32  
15 for the principal officer?

16 MR. UDOIBOK: Your Honor, may I approach?

17 THE COURT: You may approach.

18 **(Sidebar discussion)**

19 THE COURT: Mr. Udoibok.

20 MR. UDOIBOK: Your Honor, I just want to make a  
21 record about the court's ruling on A77. The email is from  
22 Hussein Hashi. I don't know who that is or what connection  
23 that is to Ms. Bock.

24 THE COURT: Mr. Bobier.

25 MR. BOBIER: Your Honor, two things. So first,

1 this is a representative statement of a party opponent.  
2 It's her tax preparer, Feeding Our Future's tax preparer  
3 collating the information she provided in crafting this  
4 document. So, one, that obviates the hearsay concern.

5 Two, even if that weren't the case, this goes to  
6 her notice as she continues after this point to put the  
7 names of these purported board members on documents.

8 So this at a minimum, even if we are later going  
9 to hear argument that perhaps she wasn't the one sending the  
10 earlier emails from her account that lists those board  
11 members, this is coming in to her and giving her notice.

12 And finally, Your Honor, I would point out A77 is  
13 in evidence already. It's been admitted. And I'm just  
14 asking the witness if the place where his name appears is  
15 something that he authorized. Fundamentally, it's not  
16 offered for its truth.

17 MR. UDOIBOK: May I?

18 **(In open court)**

19 THE COURT: Mr. Bobier, you may continue.

20 MR. BOBIER: Thank you, Your Honor.

21 BY MR. BOBIER:

22 Q. All right. Mr. Phelps, we were looking at this Feeding  
23 Our Future tax form; is that right?

24 A. Correct.

25 Q. And in box F, the form asks for the name of the

1 principal officer. Who is the name there?

2 A. Aimee Bock.

3 Q. If we go down to page 38 of the same document, some more  
4 information here. There's an identification once again of  
5 some board members for Feeding Our Future; is that right?

6 A. I see that, yes.

7 Q. Does the list start to look a little familiar?

8 A. It does not look familiar, no.

9 Q. Well, does it look familiar from what you've seen today?

10 A. That I'm a board member? Yes. I've never seen this  
11 before.

12 Q. Were you a board member at Feeding Our Future?

13 A. I was never a board member at Feeding Our Future.

14 Q. You authorize anyone to put your name on a Feeding Our  
15 Future tax record indicating that you were?

16 A. No, I have never done that before.

17 Q. Is this true?

18 A. It's not true.

19 Q. This record also indicates that at the time Ms. Bock's  
20 salary at Feeding Our Future was over \$120,000. Do you see  
21 that?

22 A. I do see that.

23 Q. No salary listed for you, though?

24 A. Why not?

25 Q. I take it you never took a salary?

1 A. I never did.

2 Q. And also never volunteered for them, as you've told us.

3 A. Correct.

4 Q. Mr. Phelps, I'm going to show you Government's A80,  
5 which is in evidence.

6 It appears to be another Feeding Our Future  
7 document; is that fair?

8 A. Yes, it is.

9 Q. And it says Board Meeting Minutes. Are you familiar  
10 with what board meeting minutes are?

11 A. I can imagine what they are.

12 Q. What do you imagine them to be?

13 A. The board is meeting, how long -- for how long.

14 Q. Have you ever taken down board meeting minutes yourself?

15 A. I never have been to a board meeting, nor taken down for  
16 board meeting minutes.

17 Q. Well, on this Feeding Our Future document, it says that  
18 you were at the board meeting. It says you were present.

19 Do you see that X in the present column?

20 A. I do see that X.

21 Q. It says this was a special meeting at November 2018 in  
22 the morning; is that true?

23 A. That's true. That's what it says.

24 Q. Is it true that you attended a Feeding Our Future board  
25 meeting in November 2018?

1 A. I have never been to a board meeting.

2 Q. Not ever?

3 A. It is not true.

4 Q. We've seen documents indicating that you were the  
5 Feeding Our Future treasurer, right?

6 A. We have.

7 Q. This Feeding Our Future document says that you approved  
8 the budget at this meeting. I guess that's the treasurer's  
9 job?

10 A. I guess that's what the treasurer does.

11 Q. Is that what you did?

12 A. No, since I was not there and I'm not a board member.

13 Q. So that was November 2018. So before we go on, on the  
14 second page that concludes these minutes, there's a minutes  
15 certification.

16 Do you see that?

17 A. Yes.

18 Q. It says, "Proposed minutes respectfully submitted by."

19 Is that right?

20 A. Yes, it does.

21 Q. What's the name printed there?

22 A. It says Aimee Bock.

23 Q. And there's a signature?

24 A. There is.

25 Q. Let's go down to page 9 of the same document. It looks

1 like another set of minutes; is that right?

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

3 Q. This Feeding Our Future board meeting, according to this  
4 document, occurred in July of 2020 in the morning; is that  
5 true?

6 A. That's true, yes.

7 Q. Well, it's true that it's written on the document,  
8 right?

9 A. Correct.

10 Q. Do you know whether this board meeting happened on  
11 July 3rd of 2020?

12 A. I would not know.

13 Q. Why wouldn't you know if this board meeting happened in  
14 July of 2020?

15 A. Because I wasn't there.

16 Q. Does the document say that you were there or not?

17 A. It has an X under "present." So the document does say I  
18 was there.

19 Q. Is that true?

20 A. That is not true.

21 Q. It looks like you approved the budget again; is that  
22 true? Did you do that?

23 A. It's true that that's what it says. It's not true that  
24 it actually happened.

25 Q. As I click through this document, you see a number of

1 minutes for supposed board meetings at Feeding Our Future.  
2 Here on page 11 we see your name with -- here on page 13, we  
3 see your name again.

4 Is that right?

5 A. We do see our name -- my name again, yes.

6 Q. But you weren't at these; is that true?

7 A. Correct. I've never been at a board meeting for Feeding  
8 Our Future.

9 Q. Mr. Phelps, you never served on the board of Feeding Our  
10 Future, right?

11 A. Correct.

12 Q. You told us you told Aimee Bock in one of four or five  
13 conversations you've ever had with her that you would serve  
14 on the board, right?

15 A. Correct.

16 Q. And why did you say that?

17 A. Trying to help her out.

18 Q. Be a good neighbor?

19 A. Correct.

20 Q. But after that, did she ever speak with you about being  
21 on the board again?

22 A. No.

23 Q. Did you ever attend a board meeting?

24 A. Never.

25 Q. Did you ever review a budget?

1 A. Never.

2 Q. Did you ever as a board member review her actions as  
3 executive director?

4 A. Never.

5 Q. How do you feel seeing your name on document after  
6 document after document purporting that you were a board  
7 member who was actively involved with Feeding Our Future?

8 A. Pretty angry.

9 Q. Why?

10 A. Pretty upset. Why? Because I'm in federal court again  
11 for something I know nothing about.

12 Q. After Ms. Bock had that one conversation with you where  
13 she asked you to join the board --

14 A. Yep.

15 Q. -- what was the next time that you heard you were  
16 involved supposedly on the board of that organization?

17 A. When I got off the plane from Mexico.

18 Q. When about was that?

19 A. '22, I guess.

20 Q. Early 2022?

21 A. Yep.

22 Q. And what did you find out when you got off the board --  
23 got off the plane from Mexico?

24 A. All my attorney friends messaged me, were leaving  
25 messages and asking if I was okay.

1 Q. If you were okay?

2 A. Correct.

3 Q. Why did they think you might not be okay as far as you  
4 know?

5 A. I didn't know. I didn't know.

6 Q. What did you find out?

7 A. My name was in the paper for Feeding Our Future.

8 Q. And what was the story that caused your attorney friends  
9 to be concerned?

10 A. I think \$250 million, and I was the treasurer.

11 Q. Concerning to you at the time?

12 A. Yeah.

13 Q. Mr. Phelps, had you ever been in the paper before?

14 A. I have been in the paper before.

15 Q. What was the time you were in the paper before that?

16 A. We broke the world record for the Flugtag in St. Paul.

17 Q. Flugtag?

18 A. Yeah, Red Bull Flugtag.

19 Q. What's the Red Bull Flugtag?

20 A. A bunch of people make a flying apparatus that you throw  
21 off a 50-foot platform into water.

22 Q. Like a river or a lake?

23 A. River or lake, any body of water.

24 Q. So you were in the paper because you broke a record at  
25 the Flugtag?

1 A. Yeah, the first 15 years, a world record.

2 Q. For doing what?

3 A. We broke the 150-foot mark for the Flugtag that was held  
4 for 15 years.

5 Q. Because --

6 A. In Germany.

7 Q. The contraption you built shot the farthest off --

8 A. Yeah, flew the furthest.

9 Q. So after participating in the Red Bull Flugtag being in  
10 the paper, what was the next time you made the headlines?

11 A. Feeding Our Future.

12 Q. Which one are you more proud of?

13 A. We'll go with the Red Bull Flugtag.

14 MR. BOBIER: Thank you.

15 Nothing further, Your Honor.

16 THE COURT: Mr. Udoibok.

17 MR. UDOIBOK: Thank you, Your Honor.

18 CROSS-EXAMINATION

19 BY MR. UDOIBOK:

20 Q. So my name is Kenneth Udoibok. I represent Aimee Bock.  
21 You didn't really want to be here, did you?

22 A. I don't think anybody would.

23 Q. Okay. I understand.

24 And you said you met with the, with the government  
25 lawyers five times?

1 A. I have, yes.

2 Q. Was there any accusation that you got money from Feeding  
3 Our Future?

4 A. Accusations that I --

5 Q. That you got money from Feeding Our Future.

6 A. Not that I know of.

7 Q. All right. Was there any accusation that you signed a  
8 document that gave Feeding Our Future money?

9 A. No, I don't think so.

10 Q. No. Between Ms. Bock and Coley Flynn, who do you know  
11 more?

12 A. Coley Flynn.

13 Q. All right. And you still know, are you still friends  
14 with Mr. Flynn?

15 A. Yeah, he's my neighbor.

16 Q. All right. And I believe you testified that you just  
17 wanted to help out Ms. Bock in joining the board.

18 A. Correct.

19 Q. And has anyone accused you of owing money to somebody?

20 A. Besides everybody reading the paper?

21 Q. Besides reading the paper.

22 A. I would say no.

23 MR. UDOIBOK: No. No further questions.

24 THE WITNESS: Okay.

25 THE COURT: Mr. Montez.

1 MR. MONTEZ: No questions, Your Honor.

2 THE COURT: Mr. Bobier.

3 MR. BOBIER: Nothing further, Your Honor.

4 THE COURT: You may step down, sir. Thank you.

5 And the government may call its next witness.

6 MR. THOMPSON: Your Honor, the government calls  
7 Farhiyo Moalim.

8 THE COURT: Okay. I'm sorry. Did you want a  
9 break?

10 MR. THOMPSON: We're okay.

11 THE COURT: Okay.

12 Good morning.

13 THE WITNESS: Good morning.

14 THE COURT: I'm going to have you stand up and  
15 take the oath before me. Okay. Raise your right hand.

16 FARHIYO MOALIM,  
17 called on behalf of the government, was duly sworn, was  
18 examined and testified as follows:

19 THE WITNESS: Yes.

20 THE COURT: Okay. Thank you. You may be seated.

21 And you are going to speak right into that  
22 microphone, and when you are settled, please state and spell  
23 both your first and last name for the record.

24 Go ahead.

25 THE WITNESS: Farhiyo Moalim.

1 THE COURT: Can you spell it?

2 THE WITNESS: F-A-R-H-I-Y-O. Last name  
3 M-O-A-L-I-M.

4 THE COURT: Thank you.

5 Mr. Thompson, you may inquire.

6 MR. THOMPSON: Thank you, Your Honor.

7 DIRECT EXAMINATION

8 BY MR. THOMPSON:

9 Q. Good morning.

10 A. Good morning.

11 Q. How are you?

12 A. Good.

13 Q. All right. Ms. Moalim, I'm going to ask you a few  
14 questions here. Okay?

15 A. Okay.

16 Q. Where are you from?

17 A. Kenya. Somalia.

18 Q. Where were you born?

19 A. Somalia.

20 Q. Where in Somalia?

21 A. Africa.

22 Q. Where, what part of Somalia were you born in?

23 A. Mogadishu.

24 Q. How long did you live in Mogadishu?

25 A. I was young.

- 1 Q. Okay. Your family left Somalia when you were young?
- 2 A. Yes.
- 3 Q. Where did your family go?
- 4 A. Kenya.
- 5 Q. Where in Kenya?
- 6 A. Nairobi.
- 7 Q. Why did your family leave Somalia for Nairobi, Kenya,
- 8 when you were young?
- 9 A. Fight.
- 10 Q. Fights?
- 11 A. (Moves head up and down.)
- 12 Q. The conflict in Somalia?
- 13 A. Yes.
- 14 Q. How long did you live in Nairobi, Kenya?
- 15 A. Until 2017.
- 16 Q. Did you go to school in Kenya?
- 17 A. Yes, I did.
- 18 Q. Did you graduate?
- 19 A. Yes.
- 20 Q. Where did you graduate from high school?
- 21 A. In Mombasa.
- 22 Q. In Mombasa, Kenya?
- 23 A. Yes.
- 24 Q. And that's a port city --
- 25 A. Yes.

1 Q. -- in Kenya, correct?

2 A. Yes.

3 Q. On the Indian Ocean?

4 A. Yes.

5 Q. Ms. Moalim, when did you move to the United States?

6 A. January 2017.

7 Q. January of 2017?

8 A. Mm-hmm.

9 Q. Did you come here with your family?

10 A. With my mom.

11 Q. With your mom. Where did you first come to the

12 United States in 2017?

13 A. Vegas.

14 Q. Las Vegas? A bit of a culture shock?

15 A. Yes.

16 Q. How long did you stay in Las Vegas?

17 A. About 14 days.

18 Q. And then what happened?

19 A. And then I came, moved to Minnesota.

20 Q. How old were you when you moved to Minnesota, roughly?

21 A. 20.

22 Q. Okay. When you got to Minnesota, did you work?

23 A. Yes.

24 Q. What kind of jobs did you work when you first got to

25 Minnesota?

1 A. As a retail and as a PSA and then as a para.

2 Q. You said at retail. What kind of store?

3 A. Macy's.

4 Q. The department store?

5 A. Yes.

6 Q. Did you continue your education after you moved to  
7 Minnesota?

8 A. I did.

9 Q. Could you describe that? Where did you go to school?

10 A. MCTC.

11 Q. And what did you study at MCTC?

12 A. In business and accounting.

13 Q. Okay. While you were studying in accounting, did you  
14 get a job in the accounting field?

15 A. Yes.

16 Q. Where did you get a job?

17 A. TFS.

18 Q. What is TFS?

19 A. It's accounting firm.

20 Q. Total -- thank you.

21 Is it called -- what does it stand for, TFS?

22 A. Oh, Total Financial Solution.

23 Q. Okay. When did you start working -- and this is the  
24 company that brings you to testify here today; is that  
25 right?

1 A. Yes.

2 Q. Okay. When did you start working at Total Financial  
3 Solutions?

4 A. 2020 towards the end.

5 Q. Okay. Fall of 2020?

6 A. Yeah.

7 Q. Okay. What kind of company is -- you said it's an  
8 accounting firm?

9 A. Yes.

10 Q. How big is Total Financial Solutions?

11 A. It's not that big.

12 Q. How many employees were there?

13 A. Two, three, four.

14 Q. Okay. What was your job?

15 A. Payroll.

16 Q. Okay. Who did you work for?

17 A. TFS.

18 Q. Well, who was your boss? Who hired you?

19 A. Salah.

20 Q. Salah. I'm going to show you now a picture of -- sorry.

21 I'm going to show you an exhibit that's not yet in  
22 evidence, Government Exhibit Y5. Do you recognize that  
23 photo?

24 A. Yes.

25 Q. Who is depicted in it?

1 A. Salah.

2 MR. THOMPSON: Your Honor, I move to admit  
3 Government Exhibit Y5.

4 THE COURT: Any objection?

5 MR. COLICH: No objection.

6 MR. UDOIBOK: No objection.

7 THE COURT: Y5 is admitted.

8 MR. THOMPSON: And, Ms. Moalim, just for the  
9 record that's your boss at Total Financial Solutions  
10 pictured in Government Exhibit Y5?

11 THE WITNESS: Yes.

12 BY MR. THOMPSON:

13 Q. Okay. Were there other individuals that you worked with  
14 at Total Financial Solutions?

15 A. Said.

16 Q. I'm sorry. What did you say?

17 A. Said.

18 Q. Said?

19 A. Said.

20 Q. Did he go by a nickname?

21 A. (Moves head from side to side.)

22 Q. Okay. What's his full name?

23 A. Said Salah.

24 Q. Said Salah. Is Said Salah related to the Salah that you  
25 just identified on the screen?

1 A. Sorry. I didn't get that.

2 Q. Was that his brother?

3 A. Yes.

4 Q. Did Salah, your boss, have other brothers?

5 A. Fish.

6 Q. Fish. Okay. So, Ms. Moalim, I'm just going to ask you  
7 to describe for the jury. Fish isn't his real name; is that  
8 right?

9 A. No.

10 Q. It's okay. Tell us about -- you're Somali, correct?

11 A. Mm-hmm.

12 Q. Is it common in Somali culture to use nicknames?

13 A. Yes.

14 Q. Could you just describe that for us?

15 A. Honestly, I just go by what people call other people.

16 Q. Okay. And is that commonly a nickname?

17 A. Yes.

18 Q. Often a colorful nickname by American standards?

19 A. It depends. Maybe if somebody doesn't have a hand, they  
20 call him the handless guy but in Somali words.

21 Q. So somebody without a hand might be called a handless  
22 guy?

23 A. Maybe in Somali.

24 Q. That would qualify as colorful by American standards, by  
25 Minnesota standards.

1                   So Fish, who is Fish? What's his real name, do  
2 you?

3           A. Abdulkadir Salah.

4           Q. Abdulkadir Salah. And was he related to your boss  
5 Salah?

6           A. Yes.

7           Q. I'm going to show you what's been marked, but not yet  
8 admitted, as Government Y4. Do you recognize this photo?

9           A. Yes.

10          Q. Who is depicted in it?

11          A. Abdulkadir, Fish.

12          Q. Fish?

13          A. Yes.

14                   MR. THOMPSON: Your Honor, I move to admit  
15 Government Exhibit Y4.

16                   MR. COLICH: No objection.

17                   THE COURT: Y4 is admitted.

18           BY MR. THOMPSON:

19           Q. That's Mr. Abdikadir Salah?

20           A. Yes.

21           Q. Do you know why they called him Fish?

22           A. No.

23           Q. Okay. Did Fish have another brother that you met while  
24 you worked at Total Financial Solutions?

25           A. Oh, I don't know his name.

1 Q. Okay. Do you know anything about him, where he worked,  
2 say?

3 A. With the mayor or with the governor.

4 Q. With the mayor of Minneapolis?

5 A. I don't know, somewhere.

6 Q. I'm going to show you what's been marked as Government  
7 Exhibit Y6. Do you recognize Government Exhibit Y6?

8 A. Yes.

9 Q. Who is that?

10 A. Him.

11 Q. That's him?

12 A. Mm-hmm.

13 Q. The brother who worked for the mayor of Minneapolis?

14 A. Yes.

15 MR. THOMPSON: Your Honor, I move to admit  
16 Government Exhibit Y6.

17 MR. COLICH: No objection.

18 MR. UDOIBOK: No objection.

19 THE COURT: Y6 is admitted.

20 BY MR. THOMPSON:

21 Q. All right. Ms. Moalim, could you give us a sense of  
22 what you did day-to-day at Total Financial Solutions?

23 A. I will make checks, scan papers and set up appointments  
24 for Salah.

25 Q. Okay.

1 A. And maybe do some shopping for the office.

2 Q. Like what kind of shopping for the office?

3 A. Papers.

4 Q. Okay.

5 A. Pens.

6 Q. Office supplies?

7 A. Yes, office supplies.

8 Q. Where was -- and what kind of, it was an accounting

9 firm. What kind of businesses did Total Financial Solutions

10 provide accounting services for?

11 A. Restaurants, trucking, home cares, assisted living.

12 Q. Okay. Where was, when you first started at Total

13 Financial Solutions, where was it located?

14 A. Lake -- no, I don't remember the address.

15 Q. Just off Lake Street?

16 A. 3032.

17 Q. We'll set aside the street address. Was it located next

18 to a restaurant?

19 A. Yes.

20 Q. What restaurant was it located next to?

21 A. Safari.

22 Q. And what's the Safari Restaurant?

23 A. A restaurant.

24 Q. Okay. Who owns it?

25 A. Fish.

1 Q. Okay.

2 A. Blackie.

3 Q. Blackie. Who is Blackie? That's another nickname,  
4 correct?

5 A. Yes.

6 Q. Who is Blackie?

7 A. Salim.

8 Q. Are you looking at him back there? Is he in court  
9 today?

10 A. Yes.

11 Q. And could you identify what he's wearing?

12 A. Blue lights or gray.

13 Q. Suit?

14 A. Yeah, suits.

15 MR. THOMPSON: Your Honor, could the record  
16 reflect that the witness has identified defendant Salim  
17 Said?

18 THE COURT: The record will so reflect.

19 BY MR. THOMPSON:

20 Q. So Fish, Abdulkadir Salah, and defendant Said owned  
21 Safari Restaurant?

22 A. Mm-hmm.

23 Q. As far as you know?

24 THE COURT: Is that a yes.

25 THE WITNESS: Yes. I'm sorry.

1 BY MR. THOMPSON:

2 Q. All right. Ms. Moalim, this trial as you know is about  
3 the food program, is that right, the Federal Child Nutrition  
4 Program?

5 A. Yes.

6 Q. When you worked at Total Financial Solutions, did you  
7 become aware of the Federal Child Nutrition Program?

8 A. Yes.

9 Q. How so?

10 A. The papers.

11 Q. The papers?

12 A. Yeah.

13 Q. Okay. Can you tell us what you mean by "the papers"?

14 A. There was those that you showed me.

15 Q. What kind of documents? These are the documents we  
16 looked at --

17 A. Yes.

18 Q. -- before you testified?

19 A. Yes.

20 Q. Could you explain the kind of documents that we're  
21 talking about?

22 A. I don't know by name. I just know.

23 Q. I tell you what, we're going to look at them in a  
24 second.

25 A. Okay.

1 Q. How did these food papers come to your attention while  
2 you worked at Total Financial Solutions?

3 A. People would bring them for scanning.

4 Q. People would bring the papers for scanning? What do you  
5 mean by that?

6 A. So I will scan the papers for them and email to them.

7 Q. Okay.

8 A. Because we only have one printer.

9 Q. Okay. At Total Financial Solutions?

10 A. Yes.

11 Q. Who would bring these papers to you?

12 A. The owners or maybe the employees of this company.

13 Q. That were involved in the food program?

14 A. Mm-hmm.

15 Q. And they would come to you at Total Financial Solutions,  
16 correct?

17 A. Yes.

18 Q. When they got there, did they hand you papers?

19 A. Yes.

20 Q. Did they do anything else?

21 A. Yes.

22 Q. What's that?

23 A. Meet.

24 Q. Who did they come to meet with?

25 A. Blackie, Fish. Salah?

1 Q. What did they meet about?

2 A. I don't know.

3 Q. Where did they meet?

4 A. At the office.

5 Q. Okay. Before we talk about these papers in more detail,  
6 at some point did Total Financial Solutions move to a new  
7 office that wasn't connected to Safari Restaurant?

8 A. Yes.

9 Q. When was that, do you recall?

10 A. February of 2021.

11 Q. Yeah. You seem like you don't really remember.

12 A. 2021, February somewhere.

13 Q. Okay. And where was the new location? What kind of  
14 building was it?

15 A. It was in Minneapolis at the 20 -- Portland.

16 Q. Okay. Park Avenue?

17 A. Oh, yeah, Park.

18 Q. I'm going to show you now what's been admitted as  
19 Government Exhibit U8. And this is a photo of 2722 Park  
20 Avenue.

21 A. Yes.

22 Q. In Minneapolis. Do you recognize that building?

23 A. Yes.

24 Q. How so?

25 A. That's where I worked.

1 Q. There where you worked. It's actually Park, which is  
2 one block away from Portland; is that right?

3 A. Yes.

4 Q. Okay. That's where you moved.

5 Now, Ms. Moalim, I want to show you a document.  
6 Do you know -- well, let's talk about who owned this  
7 building. Okay?

8 I'm going to show you on the screen what's been  
9 marked, but not yet admitted, as Government Exhibit N41.  
10 And this is an email. It's an email chain, but the last  
11 email in the chain is from Salim Said to Farhiyo Moalim.

12 Is that your email address where you were  
13 receiving this?

14 A. Yes.

15 Q. And who sent it?

16 A. Salim.

17 Q. Okay. And the date is June 3rd, 2021.

18 Your Honor, I move to admit Government  
19 Exhibit N41.

20 MR. COLICH: No objection.

21 THE COURT: Any objection?

22 MR. UDOIBOK: No objection.

23 THE COURT: N41 is admitted.

24 BY MR. THOMPSON:

25 Q. Okay. Ms. Moalim, I am just directing your attention to

1 the top here. Well, there's a series of emails here. The  
2 first one at the bottom is dated June 3rd, 2021, and it's  
3 from a man named Mohamed Abdulle.

4 Do you know who that is?

5 A. No.

6 Q. And it's sent to two email addresses. The first one is  
7 tfsauditors@gmail.com. Do you recognize that email address?

8 A. Yes.

9 Q. Whose is it?

10 A. The company's email.

11 Q. Total Financial Solutions?

12 A. Yes.

13 Q. And the second email address is salimsaid4040@gmail.com.  
14 Do you recognize that?

15 A. Yes.

16 Q. What is it? Whose email address that?

17 A. Oh, Salim's.

18 Q. Okay. The subject line is 2722 Park Avenue offer. And  
19 later that day Mr. Said forwards that email to Farhiyo  
20 Moalim, farhiyo.tsf@gmail.com. Do you recognize that email  
21 address?

22 A. Yes.

23 Q. Who is that?

24 A. That's mine.

25 Q. And 2722 Park Avenue, that's the building that Total

1 Financial Solutions moved to in 2021?

2 A. Yes.

3 Q. I'm just going to direct your attention to page 2. Do

4 you see the purchase price of this building?

5 A. Yes.

6 Q. What's the purchase price?

7 A. \$2,675,000.

8 Q. And do you know who purchased it?

9 A. Is it, Salah?

10 Q. I'm asking you if you know.

11 A. I'm not sure.

12 Q. Okay. Did you have any understanding of who owned it?

13 A. I'm not sure.

14 Q. Okay. When you started working there, can you tell us

15 about who -- well, tell us about that building. You -- I'll

16 put U8 back up on the screen. Can you tell us about this

17 building?

18 A. I mean, whoever wants to lease or rent, they will just

19 come to the office, maybe make an appointment with Fish or

20 Salim or Salah.

21 Q. Okay. If they want to rent space in this building?

22 A. Yes.

23 Q. They would talk to Fish, Abdulkadir Salah?

24 A. Abdulkadir Salah.

25 Q. Or Salim Said?

1 A. Yes.

2 Q. Or your boss, Salah? This is -- could you describe the  
3 building itself?

4 A. It's old.

5 Q. Was it originally an office building?

6 A. I don't know.

7 Q. Okay. There was different units in it?

8 A. Yes.

9 Q. It looks like a big fireplace, like a big living room in  
10 the first floor, correct?

11 A. First floor?

12 Q. Yeah.

13 A. Yes.

14 Q. Like an old mansion?

15 A. Yes.

16 Q. Okay. So if people want to lease space in it, they  
17 would come and meet with the defendant Said or one of his  
18 partners; is that right?

19 A. Yes.

20 Q. Okay. What kind of businesses rented space in there?

21 A. Different.

22 Q. Okay.

23 A. Truckers, home cares.

24 Q. When you say "home care," what do you mean?

25 A. Like people who have group homes and home cares, but

1 they want the office space instead of doing it in the house.

2 Q. Okay. And you said trucking?

3 A. Truckers.

4 Q. What do you mean by "truckers"?

5 A. I don't know.

6 Q. Like transportation companies?

7 A. Yes.

8 Q. Were there trucks parked outside?

9 A. Just the office.

10 Q. Okay.

11 A. They used office.

12 Q. Okay. And Total Financial Solutions, your company was  
13 there, correct?

14 A. Yes.

15 Q. Who would work in the office at Total Financial  
16 Solutions when you were at 2722 Park Avenue?

17 A. Me and Said Salah and Salah, the company.

18 Q. Were other people there regularly?

19 A. Yes.

20 Q. Who else would be at the office regularly?

21 A. Salim.

22 Q. Salim Said, the defendant?

23 A. Yes. And sometimes Fish.

24 Q. How often would Fish be there?

25 A. Honestly, once in a while. Maybe -- I don't know.

- 1 Q. Like --
- 2 A. He sometimes regular, sometimes not that regular.
- 3 Q. How about Salim Said? How often would he be at the
- 4 office?
- 5 A. Quite a bit.
- 6 Q. Most days?
- 7 A. Almost every day.
- 8 Q. Okay. What would he be doing when he was at Total
- 9 Financial Solutions?
- 10 A. I don't know.
- 11 Q. Okay. Would he meet with people?
- 12 A. Yes.
- 13 Q. Who would he meet with?
- 14 A. People.
- 15 Q. People who are involved in what businesses?
- 16 A. Businesses is different, but he would meet with people.
- 17 Q. Okay. All right. Well, you talked a little bit about
- 18 the food program. Okay. Tell us about these papers that
- 19 you would receive because this happened a lot at this
- 20 business, this location?
- 21 A. Yes.
- 22 Q. People would come in, you said?
- 23 A. Yes.
- 24 Q. And what would they give you?
- 25 A. The rosters, just come.

1 Q. Okay. And what would you do then?

2 A. And then send it to the email on that papers, the  
3 company's name.

4 Q. How often did this happen?

5 A. Couple times, like towards the end of the month.

6 Q. Okay. And it would kind of come all at the same time  
7 each month?

8 A. Yes.

9 Q. Okay. And these people that would come in and deliver  
10 these papers or give them to you to scan, you said they  
11 would meet with people, correct?

12 A. Yes.

13 Q. And who would they meet with, and where would they meet?

14 A. At the Safari room.

15 Q. What's the Safari room?

16 A. That's the room.

17 Q. What do you mean "it's their room"? Whose room is it?

18 A. Fish and Salim.

19 Q. How was it their room?

20 A. Because they in there.

21 Q. Okay. Why did you call it the Safari room?

22 A. Because we -- nobody goes in there, and that's their  
23 room. And if they have any meeting, they can use that room  
24 for meetings.

25 Q. Okay. You said no one else would go in there. What do

1 you mean by that?

2 A. Nobody knows what goes in there.

3 Q. Did you know -- were you allowed to go in there?

4 A. Nobody's allowed to go in there, but I would try to  
5 clean down the tables.

6 Q. Ms. Moalim, you talked about the food papers that you  
7 would scan. Okay. I want to show you some of them.

8 First, what's been marked, but not yet admitted,  
9 as Government Exhibit N15. And I'm showing you on the  
10 screen, and it's an email. It's from  
11 scanner@tsfaccountants.com, and then it's to your email  
12 address farhiyo.tsf@gmail.com; is that right?

13 A. Yes.

14 Q. And there's a series of documents attached to this  
15 email. Could you describe -- I mean, one, is this an at  
16 email that you, of documents that you scanned to yourself?

17 A. Yes.

18 MR. THOMPSON: Your Honor, I move to admit  
19 Government Exhibit N15.

20 THE COURT: Any objection?

21 MR. COLICH: No objection.

22 MR. UDOIBOK: No objection.

23 THE COURT: N15 is admitted.

24 BY MR. THOMPSON:

25 Q. All right. So, Ms. Moalim, for those of us who don't

1 scan a lot of documents, can you describe what this email  
2 is?

3 A. The scanner sends everything like email it to me.

4 Q. Okay. So you take the documents. You'd scan them, and  
5 then what happened?

6 A. Yes, and then I email it to myself, or I don't know. It  
7 comes into my, and then I send it out to them.

8 Q. Okay. And this is an example of you scanning documents  
9 and emailing it to yourself, correct?

10 A. Yes.

11 Q. Okay. And this one particularly is January 4th, 2022,  
12 correct?

13 A. Yes.

14 Q. I'm just going to direct your attention to the second  
15 page, and there's a document after School Meal Counts,  
16 Clicker for Bet on Better Future, Safari Restaurant.

17 Are you familiar with sheets that look like this?

18 A. Yes.

19 Q. How so?

20 A. They're the ones I scan.

21 Q. They're the ones you scanned?

22 A. Yes.

23 Q. This one is for Safari Restaurant. Did you scan  
24 documents for Safari Restaurant?

25 A. Yes.

1 Q. Who would ask you to do that?

2 A. Whoever brings it.

3 Q. Who was associated with Safari Restaurant? Who owned  
4 it?

5 A. Fish, Salim.

6 Q. Salim Said, the defendant in this case?

7 A. Yes.

8 Q. Okay. And these meal counts here that are attached to  
9 the email you scanned to yourself, Government Exhibit N15,  
10 show 3500 meals prepared every single day.

11 Is that typical of the types of meal count sheets  
12 that you would scan?

13 A. Yes.

14 Q. Big numbers like that?

15 A. Yes.

16 Q. Consistent numbers?

17 A. Yes.

18 Q. I'm going to show you now what's been admitted as  
19 Government Exhibit FF5, and this is a document that was  
20 recovered during the investigation.

21 More meal counts for Safari Restaurant. Again,  
22 this is 6,000 a day. Is that similar to the ones that you  
23 saw when you worked at Total Financial Solutions?

24 A. Yes.

25 Q. And you were asked to scan?

1 A. Yes.

2 Q. I'll go back briefly to N15. And at page 10, there's an  
3 invoice that says Safari Restaurant. Did you scan invoices  
4 like this?

5 A. Yes.

6 Q. And this is a pretty big invoice, \$554,000.

7 A. Yes.

8 Q. Why are you smiling?

9 A. Because it's good money.

10 Q. Did you scan invoices like that with some regularity  
11 when you worked at Total Financial Solutions?

12 A. Yes.

13 Q. Related to the food program?

14 A. Yes.

15 Q. Including for defendant Salim Said?

16 A. Yes.

17 Q. I want to show you another exhibit that's not yet in  
18 evidence, it's N14.

19 Ms. Moalim, is this another example of documents  
20 that you scanned and emailed to yourself?

21 A. Yes.

22 MR. THOMPSON: Your Honor, I move to admit  
23 Government Exhibit N14.

24 MR. UDOIBOK: No objection.

25 MR. COLICH: No objection.

1 THE COURT: N14 is admitted.

2 BY MR. THOMPSON:

3 Q. And starting at the first page, again it's a scan,  
4 scanned documents that you scanned to your own email address  
5 on January 4th of 2022; is that right?

6 A. Yes.

7 Q. I'm directing your attention to the second page.  
8 Actually I'll go to the third page here.

9 These meal counts are for a site called ASA  
10 Limited. Are you familiar with that site?

11 A. Yes.

12 Q. How so?

13 A. We do payroll for them.

14 Q. Okay. And do you recall the name of the person who --  
15 would you receive -- sorry. Let me stop.

16 You said you did payroll for that company.

17 A. Yes.

18 Q. ASA Limited?

19 A. Yes.

20 Q. What do you mean by that?

21 A. Do checks.

22 Q. Okay. You'd cut checks for the company?

23 A. Yes.

24 Q. At whose direction?

25 A. The owner.

1 Q. Okay. And do you recall the name of the owner of this  
2 company?

3 A. Starts with Abdi.

4 Q. Okay. If I show you a picture, will that help?

5 A. Yes.

6 Q. I'm going to show you what's been marked but not yet  
7 admitted as Government Exhibit Y7. Do you recognize that  
8 photo?

9 A. Yes.

10 Q. Who is it of?

11 A. The owner of ASA.

12 Q. Okay. Do you recall his name sitting here today? You  
13 said it was Abdi?

14 A. Abdi.

15 Q. Okay.

16 MR. THOMPSON: Your Honor, I move to admit  
17 Government Exhibit Y7.

18 THE COURT: Any objection?

19 MR. UDOIBOK: No objection.

20 THE COURT: Y7 is admitted.

21 MR. COLICH: Your Honor?

22 THE COURT: Yes.

23 MR. COLICH: Is there a last name identifying this  
24 person?

25 THE COURT: Not from this witness.

1 MR. COLICH: Then no objection.

2 THE COURT: Y7 is admitted.

3 MR. THOMPSON: Okay.

4 BY MR. THOMPSON:

5 Q. Going back to Government Exhibit Y -- N14, sorry, and  
6 these meal counts for ASA Limited, the number of meals  
7 received and prepared each day is 2,000, 2,000, 2,000,  
8 2,000, 2,000; is that right?

9 A. Yes.

10 Q. Is that typical of what you saw for this ASA Limited  
11 site?

12 A. Yes.

13 Q. And it goes on.

14 And then at the page 10, there's another invoice;  
15 is that right?

16 A. Yes.

17 Q. How much is ASA Limited invoicing for meals distributed  
18 in December 2021?

19 A. 316,160.

20 Q. Is that typical what you would see from ASA Limited?

21 A. Yes.

22 Q. I'm going to show you now what's been marked, but not  
23 yet admitted -- well, actually let me --

24 The owner of ASA Limited, he would come by and  
25 bring those papers for you to scan?

1 A. Yes.

2 Q. Would he see anyone when he came to the office?

3 A. Yes.

4 Q. Who would he talk to?

5 A. Fish, Blackie and -- Abdulkadir and Salim Said.

6 Q. Fish being Abdulkadir Salah, and Blackie being the  
7 defendant Salim Said?

8 A. Yes.

9 Q. Okay. And where would they talk?

10 A. Safari room.

11 Q. All right. Now I'm showing you what's been marked, but  
12 not yet admitted, as Government Exhibit N4. And is this an  
13 email that you sent on April 1st, 2021?

14 A. Yes.

15 MR. THOMPSON: Your Honor, I move to admit  
16 Government Exhibit N4.

17 THE COURT: Any objection?

18 MR. UDOIBOK: No objection.

19 MR. COLICH: No objection.

20 THE COURT: N4 is admitted.

21 BY MR. THOMPSON:

22 Q. Okay. Who did you send this email to?

23 A. TFS.

24 Q. TFS Auditors?

25 A. Yes.

1 Q. And who used that email account?

2 A. The whole company.

3 Q. Okay. The subject line here is Summer Meal Count for  
4 March. I'm directing your attention to page 4.

5 There's more meal counts; is that right?

6 A. Yes.

7 Q. What company is, what site are these meal counts for?

8 A. Olive Management.

9 Q. What is Olive Management?

10 A. A restaurant.

11 Q. Whose restaurant?

12 A. Salah.

13 Q. Salah, your boss?

14 A. Yes.

15 Q. And would he give you these forms to scan in?

16 A. Yes.

17 Q. These meal counts were Olive Management?

18 A. Yes.

19 Q. And here, the meal counts for the March of -- for the  
20 month of March 2021 are exactly 3,000 meals prepared every  
21 single day, seven days a week; is that right?

22 A. Yes.

23 Q. Is that typically what you saw when Salah would give you  
24 meal counts for the Olive Management site?

25 A. Yes.

1 Q. I'm going to show you now what's been marked, but not  
2 admitted, as Government Exhibit N10. And this is another  
3 email that you sent to the TFS Auditors email address on  
4 October 4th of 2021; is that right?

5 A. Yes.

6 Q. And contains more meal counts for Olive Management?

7 A. Yes.

8 MR. THOMPSON: Your Honor, I move to admit  
9 Government Exhibit N10.

10 MR. COLICH: No objection.

11 MR. UDOIBOK: No objection.

12 THE COURT: N10 is admitted.

13 MR. THOMPSON: Thank you.

14 BY MR. THOMPSON:

15 Q. Do you see this email, Ms. Moalim?

16 A. Yes.

17 Q. Who did you send this email titled or with the subject  
18 line Summer Meal Count?

19 A. Salah.

20 Q. Getting harder to read, but turning your attention to  
21 page 4, could you describe these meal counts for the Olive  
22 Management site?

23 A. Foods that were given to kids.

24 Q. 2,000 a day?

25 A. Yes.

1 Q. Seven days a week?

2 A. Yes.

3 Q. Would Salah go, your boss Salah, go into the Safari  
4 room?

5 A. It's his place.

6 Q. Would he meet with defendant Said and Abdulkadir Salah  
7 in that room?

8 A. Yes.

9 Q. To talk about the food program?

10 A. I don't know that one.

11 Q. All right. I'd like to show you now what's been marked,  
12 but not yet admitted, as Government Exhibit G27. Is this an  
13 email that you sent on November 2nd, 2021?

14 A. Yes.

15 Q. To an email address a.mohamud15@gmail.com?

16 A. Yes.

17 Q. And there's meal count forms attached?

18 A. Yes.

19 MR. THOMPSON: Your Honor, I move to admit  
20 Government Exhibit G27.

21 MR. COLICH: No objection.

22 MR. UDOIBOK: No objection.

23 THE COURT: G27 is admitted.

24 MR. THOMPSON: Okay. Ms. Moalim, that's your  
25 email address sending this email?

1 THE WITNESS: Yes.

2 BY MR. THOMPSON:

3 Q. And the subject line, Meal Count?

4 A. Yes.

5 Q. The date, November 2nd, 2021?

6 A. Yes.

7 Q. And directing your attention to the third page. This is  
8 one of the, from the attachments to this email, another meal  
9 count sheet?

10 A. Yes.

11 Q. What's the site here?

12 A. Stigma-Free.

13 Q. And Willmar?

14 A. Willmar, yeah.

15 Q. Did you get meal count sheets for a Stigma-Free, Willmar  
16 site? Did someone bring meal count sheets for Stigma-Free,  
17 Willmar?

18 A. Yes.

19 Q. You are familiar with that site?

20 A. Yes.

21 Q. The supervisor listed here is Abdikadir Mohamud or  
22 Mohamud -- Mohamud. Do you know who that is?

23 A. Yes.

24 Q. Who is he? How did you know him?

25 A. The owner.

1 Q. Of what?

2 A. Stigma-Free.

3 Q. Stigma-Free, Willmar. Would he come in to Total  
4 Financial Solutions?

5 A. Yes.

6 Q. Why?

7 A. Because we would do taxes and payroll for him.

8 Q. Would he bring meal count sheets like this?

9 A. Yes.

10 Q. What would he do with them when he got to Total  
11 Financial Solutions?

12 A. I would scan and send to him.

13 Q. You would scan and send it to him?

14 A. Yes.

15 Q. Would Abdikadir Mohamud meet with anyone at Total  
16 Financial Solutions?

17 A. Yes.

18 Q. Who would he meet with?

19 A. Fish, Blackie, Salah.

20 Q. In the Safari room?

21 A. Not in the Safari room.

22 Q. Elsewhere also?

23 A. Yes.

24 Q. And are these typical of the counts that you would see  
25 that Abdikadir Mohamud, Mohamed, would give you for the

1 Stigma-Free, Willmar site?

2 A. Yes.

3 Q. I'm going to show you what's been marked, but not yet  
4 admitted, as Government Exhibit Y9. Do you recognize the  
5 person depicted in Government Exhibit Y9?

6 A. Yes.

7 Q. Who is it?

8 A. Abdikadir.

9 COURT REPORTER: Could you --

10 THE COURT: Could you say the name again?

11 THE WITNESS: Abdikadir.

12 MR. THOMPSON: Your Honor, I move to admit  
13 Government Exhibit Y9.

14 THE COURT: Any objection?

15 MR. COLICH: No objection.

16 MR. UDOIBOK: No objection.

17 THE COURT: Y9 is admitted.

18 MR. THOMPSON: Thank you.

19 BY MR. THOMPSON:

20 Q. Your Honor, I -- or, Ms. Moalim, I'd like to show you  
21 what's been marked, but not yet admitted, as Government  
22 Exhibit H26. Is this an email that you received from  
23 Abdikadir Mohamud?

24 A. Yes.

25 Q. On November 21st, 2021?

1 A. Yes.

2 MR. THOMPSON: Your Honor, I move to admit  
3 Government Exhibit H26.

4 MR. COLICH: No objection.

5 MR. UDOIBOK: No objection.

6 THE COURT: H26 is admitted.

7 BY MR. THOMPSON:

8 Q. This email was sent on November 21st, 2021, correct?

9 A. Yes.

10 Q. The subject line, November Meal Click Willmar?

11 A. Yes.

12 Q. And again, attached to it is the meal count sheets such  
13 as the ones you received from Abdikadir Mohamud?

14 A. Yes.

15 Q. For the Stigma-Free, Willmar site?

16 A. Yes.

17 Q. Typical of the meal counts that you received from him?

18 A. Yes.

19 Q. I'm going to show you now what's been marked, but not  
20 yet admitted, as G32. Is this another email that you  
21 received from Abdikadir Mohamud?

22 A. Yes.

23 Q. On November 14th of 2021?

24 A. Yes.

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

1 Government Exhibit G32.

2 MR. COLICH: No objection.

3 MR. UDOIBOK: No objection.

4 THE COURT: G32 is admitted.

5 MR. THOMPSON: Thank you.

6 BY MR. THOMPSON:

7 Q. Ms. Moalim, this email, the subject line is Willmar, Two  
8 Weeks, November; is that right?

9 A. Yes.

10 Q. And there's two documents attached to it; is that right?

11 A. Yes.

12 Q. One appears to be an Excel spreadsheet that's main  
13 attendance; is that right?

14 A. Yes.

15 Q. I'm directing your attention to page 2 of this document.  
16 There's a document that's titled Stigma-Free International,  
17 Willmar, and then it says Tunyar Trading.

18 Are you familiar with Tunyar Trading?

19 A. Yes.

20 Q. How so?

21 A. The owner?

22 Q. Who's the owner?

23 A. Abdikadir.

24 Q. Of the Stigma-Free, Willmar site?

25 A. Yes.

1 Q. That's his company?

2 A. Yes.

3 Q. How had you seen it before?

4 A. I didn't see it.

5 Q. How are you familiar with it?

6 A. Just do payrolls.

7 Q. You did payroll for it?

8 A. Yes.

9 Q. When you say you did payroll, what did you do for it?

10 A. Give out checks.

11 Q. You'd give out checks?

12 A. Yes.

13 Q. What kind of business was Tunyar Trading in?

14 A. Investment.

15 Q. The food program?

16 A. The food program.

17 Q. Okay. This document, Feeding Our Future, Stigma-Free  
18 International Willmar, Tunyar Trading, then it says  
19 attendance for after-school program for the month of  
20 September 2021.

21 Did you see rosters like this when you worked at  
22 Total Financial Solutions?

23 A. Yes.

24 Q. Where would you see them?

25 A. Just with the other rosters together.

1 Q. How would they come to you?

2 A. Somebody brings it.

3 Q. The person who owns the site?

4 A. Or the employee, the manager of that site.

5 Q. And when they brought you a roster like this, what would  
6 you do with it?

7 A. Scan it and send it to the owner.

8 Q. So for Stigma-Free, Willmar, it would be Abdikadir?

9 A. Yes.

10 Q. And directing your attention to page 32 of this exhibit,  
11 there's also attached to it more meal counts; is that right?

12 A. Yes.

13 Q. Similar to the meal counts that we've seen before?

14 A. Yes.

15 Q. 2,000 a day for the Stigma-Free, Willmar site?

16 A. Yes.

17 Q. For those two weeks in November 2021?

18 A. Yes.

19 Q. I'm going to show you now what's been marked, but not  
20 yet admitted, as Government Exhibit H28. Is this an email  
21 that you sent to a man named Abdinasir Abshir?

22 A. Yes.

23 Q. On January 5th of 2022?

24 A. Yes.

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

1 Government Exhibit H28.

2 MR. COLICH: No objection.

3 MR. UDOIBOK: No objection.

4 THE COURT: H28 is admitted.

5 BY MR. THOMPSON:

6 Q. The subject line of this email is December 2020 Meal  
7 Count and Invoices; is that right?

8 A. Yes.

9 Q. And there's two attachments titled Stigma-Free, Mankato  
10 Invoice and Stigma-Free, Mankato Count. Are you familiar  
11 with Stigma-Free, Mankato?

12 A. Yes.

13 Q. How so?

14 A. They are in the food program.

15 Q. They are in the food program?

16 A. Yes.

17 Q. And how did you know that?

18 A. Because of the invoice.

19 Q. You'd get the papers?

20 A. Yes.

21 Q. Okay. This email you sent about Stigma-Free, Mankato  
22 was to Abdinasir Abshir. Who is that?

23 A. Another guy.

24 Q. Another guy?

25 A. Yes.

1 Q. When you say "another guy," what do you mean?

2 A. Another like, he has another business with us that we do  
3 payroll too.

4 Q. He would do payroll?

5 A. Yes.

6 Q. Why were you sending him these meal counts and invoices  
7 for the Stigma-Free, Mankato site?

8 A. Maybe the owners Stigma-Free told me to send it to him.

9 Q. Okay. And directing your attention to page 4, we see  
10 more meal counts for the Stigma-Free, Mankato site?

11 A. Yes.

12 Q. Does it look similar to the other meal counts we've seen  
13 for these other sites?

14 A. Yes.

15 Q. 2,000 a day?

16 A. Yes.

17 Q. Is that typically what you would see for Stigma-Free,  
18 Mankato?

19 A. Yes.

20 Q. And if we page through, there's also a roster for that  
21 site; is that right?

22 A. Yes.

23 Q. And an invoice on page 11. This invoice was from a  
24 company called Horseed Management. Are you familiar with --  
25 have you heard of that company name before?

1 A. Yes.

2 Q. Where had you heard that name before?

3 A. We do payroll.

4 Q. Who did payroll for Horseed Management?

5 A. TFS.

6 Q. Total Financial Solutions?

7 A. Yes.

8 Q. And were you involved in that?

9 A. Yes.

10 Q. What would you do?

11 A. Make checks.

12 Q. Did you know whose company was Horseed Management?

13 A. Yes.

14 Q. Whose?

15 A. Abdinasir Abshir.

16 Q. And directing your attention to the first page of this

17 Exhibit H8, that's the man who you sent this email to?

18 A. Yes.

19 Q. Do you know what he looks like?

20 A. Yes.

21 Q. I'm going to show you now what's been marked, but not

22 yet admitted, as Government Exhibit Y10. Do you recognize

23 the man pictured in that photo?

24 A. Yes.

25 Q. Who is it?

1 A. Abdinasir Abshir.

2 MR. THOMPSON: Your Honor, I move to admit  
3 Government Exhibit Y10.

4 MR. COLICH: No objection.

5 MR. UDOIBOK: No objection.

6 THE COURT: Y10 is admitted.

7 BY MR. THOMPSON:

8 Q. That's Abdinasir Abshir?

9 A. Yes.

10 Q. Who owned Horseed Management?

11 A. Yes.

12 Q. When Abdinasir -- would Abdinasir Abshir ever come to  
13 2722 Park Avenue?

14 A. Yes.

15 Q. Why?

16 A. First, payroll; and second, meetings.

17 Q. Okay. When you say for "payroll," what do you mean?

18 A. Checks, I'll make checks for his company.

19 Q. What kind of checks?

20 A. Employee checks.

21 Q. Okay.

22 A. His checks. I don't know.

23 Q. Checks to him?

24 A. Yes.

25 Q. Okay. You said for meetings. Who would he meet with?

1 A. Salah, Fish, Blackie.

2 Q. Defendant Salim Said?

3 A. Yes.

4 Q. Where would they meet?

5 A. In the office.

6 Q. The Safari room?

7 A. Yes.

8 Q. I'm going to show you now what's been marked, but not  
9 yet admitted, as Government Exhibit N6. Is this another  
10 email that you sent to the TFS Auditors gmail account?

11 A. Yes.

12 Q. This time on June 18th of 2021?

13 A. Yes.

14 MR. THOMPSON: Your Honor, I move to admit  
15 Government Exhibit N6.

16 MR. COLICH: No objection.

17 MR. UDOIBOK: No objection.

18 THE COURT: N6 is admitted.

19 BY MR. THOMPSON:

20 Q. The subject line of this email is HO Meal Count for May  
21 and April; is that right?

22 A. Yes.

23 Q. Is HO initials?

24 A. I don't remember.

25 Q. Okay. Let's look at page 2. There was meal counts

1 attached to this email; is that right?

2 A. Yes.

3 Q. For the site Stigma-Free International, Waite Park. Are  
4 you familiar with that?

5 A. Yes.

6 Q. How so?

7 A. We do payrolls for them too.

8 Q. Okay. Did you see meal counts for that site?

9 A. Yes.

10 Q. Would someone bring them to you?

11 A. Yes.

12 Q. Who?

13 A. Maybe -- anybody would bring it.

14 Q. Lots of people brought lots of meal counts to you?

15 A. Yes.

16 Q. At Total Financial Solutions?

17 A. Yes.

18 Q. The supervisor listed here on this meal count, which is  
19 dated April 4th, 2021, is Hamdi Omar. Are you familiar with  
20 Hamdi Omar?

21 A. Maybe.

22 Q. Okay. How so?

23 A. Maybe she brought one of these papers --

24 Q. Okay.

25 A. -- for scanning.

1 Q. The meals prepared every day here are 1700; is that  
2 right?

3 A. Yes.

4 Q. And then it goes on. It goes on later, for example, on  
5 page 4 to be 2,000 every single day; is that right?

6 A. Yes.

7 Q. Seven days a week.

8 A. Yes.

9 Q. Is that typical of what you would see from the  
10 Stigma-Free, Waite Park site?

11 A. Yes.

12 Q. And it goes on for the month of May here at page 11.  
13 Again, 2,000 every single day for Stigma-Free, Waite Park?

14 A. Yes.

15 Q. There were other sites called Stigma-Free; is that  
16 right?

17 A. Yes.

18 Q. What is Stigma-Free International? Are you familiar  
19 with it?

20 A. A restaurant.

21 Q. Do you have any idea?

22 A. No.

23 Q. You just saw papers; is that right?

24 A. Yes.

25 Q. Do you know whether or not it had a physical restaurant?

1 A. I don't know.

2 Q. Okay. I'm going to show you a couple more examples.

3 This one has been marked but not yet admitted as J15. And  
4 is this an email that you sent to tfsauditors@gmail.com on  
5 November 3rd, 2021?

6 A. Yes.

7 MR. THOMPSON: Your Honor, I move to admit  
8 Government Exhibit J15.

9 MR. COLICH: No objection.

10 MR. UDOIBOK: No objection.

11 THE COURT: J15 is admitted.

12 BY MR. THOMPSON:

13 Q. And this one says Stigma-Free Meal Count for October; is  
14 that right?

15 A. Yes.

16 Q. And this has meal counts for a site called Stigma-Free  
17 International, St. Cloud; is that right?

18 A. Yes.

19 Q. For the food program?

20 A. Yes.

21 Q. 2,000 a day?

22 A. Yes.

23 Q. And you I assume scanned these and sent them; is that  
24 right?

25 A. Yes.

1 Q. I'm going to show you now what's been marked as  
2 Government Exhibit F35, not yet in evidence. Another email  
3 that you sent on December 2nd, 2021; is that right?

4 A. Yes.

5 Q. To an email address stigma-freemnl@gmail.com.

6 Your Honor, I move to admit Government Exhibit  
7 F35.

8 MR. COLICH: No objection.

9 MR. UDOIBOK: No objection.

10 THE COURT: F35 is admitted.

11 BY MR. THOMPSON:

12 Q. And, Ms. Moalim, the subject line says this is November  
13 Meal Count and Invoices; is that right?

14 A. Yes.

15 Q. The email address to which you sent it is  
16 stigma-freemnl@gmail.com. Are you familiar with that email  
17 address?

18 A. Yes.

19 Q. From where?

20 A. From the payroll.

21 Q. From the payroll?

22 A. Yes.

23 Q. From when you worked at Total Financial Solutions?

24 A. Yes.

25 Q. Who used that email address?

1 A. Abdulkadir.

2 Q. Is that one that was used by multiple people, as far as  
3 you know?

4 A. Maybe.

5 Q. And the attachments here, Stigma-Free, St. Cloud Clicks  
6 and Invoices, Horseed Management, 1130 Holdings, Tunyar,  
7 Stigma-Free, Willmar, Feeding Our Youth Clicks and Invoices,  
8 are you familiar with those entities?

9 A. Yes.

10 Q. All in the food program?

11 A. Yes.

12 Q. We'll start with 1130 Holdings. Are you familiar with  
13 1130 Holdings?

14 A. Yes.

15 Q. How so?

16 A. I do payrolls too for him.

17 Q. For that company?

18 A. Yes.

19 Q. Okay. This invoice is rather large. Have you seen  
20 invoices like this or payroll like this for 1130 Holdings?

21 A. Yes.

22 Q. \$600,000 for the month of November 2021?

23 A. Yes.

24 Q. And the meal counts for that month here at page 7 are  
25 4,000 a day, seven days a week; is that right?

1 A. Yes.

2 Q. For Stigma-Free, St. Paul?

3 A. Yes.

4 Q. Then at page 11 there's an invoice for Feeding Our  
5 Youth. Are you familiar with Feeding Our Youth?

6 A. Yes.

7 Q. Whose company is that?

8 A. I don't remember.

9 Q. Okay. What's the amount of that invoice?

10 A. 403,465.

11 Q. Okay. And it's billing to Stigma-Free?

12 A. Yes.

13 Q. And then they list an address here, Feeding Our Youth.  
14 What city is that located in?

15 A. Waite Park.

16 Q. And then at page 14 of Government Exhibit F35, there's  
17 meal counts for the Stigma-Free, Waite Park site; is that  
18 right?

19 A. Yes.

20 Q. And it looks like it's 2,659 people every day; is that  
21 right?

22 A. Yes.

23 Q. And the supervisor is listed as Hamdi Omar; is that  
24 right?

25 A. Yes.

1 Q. She's, she ran the Stigma-Free, Waite Park site?

2 A. Yes.

3 Q. I direct your attention to page 19. There's an invoice  
4 attached to this email at Government Exhibit F35 for Horseed  
5 Management; is that right?

6 A. Yes.

7 Q. What's the total amount of that invoice for  
8 November 2021?

9 A. 305,874.

10 Q. And that's Abdinasir Abshir's company?

11 A. Yes.

12 Q. And then there's meal counts for that Stigma-Free,  
13 Mankato site; is that right?

14 A. Yes.

15 Q. For that same month? 2,000 a day?

16 A. Yes.

17 Q. Okay. I want to show you just a few more. Okay?

18 A. Okay.

19 Q. This is a big folder. We're not going to go through it  
20 all.

21 THE COURT: Mr. Thompson, if you've got a few  
22 more --

23 MR. THOMPSON: That's fine. We can break now.

24 THE COURT: All right. We're going to take a  
25 lunch break. So we'll go until 1:25.

1           So all rise for the jury. And then I want to talk  
2 to the attorneys.

3 12:24 p.m.

4                           **IN OPEN COURT**

5                           **(JURY NOT PRESENT)**

6           THE COURT: Counsel, do you have anything else for  
7 the record? I just wanted to make sure that she's escorted  
8 out.

9           MR. THOMPSON: One moment, Your Honor.

10          THE COURT: Thank you.

11                       (Counsel confer)

12          MR. THOMPSON: No, Your Honor. We're fine. We  
13 addressed the issue.

14          THE COURT: All right. Thank you.

15                       All right. 1:25. We're in recess. Thank you.

16                       (Recess taken at 12:25 p.m. till 1:26 p.m.)

17 1:26 p.m.

18                           **IN OPEN COURT**

19                           **(JURY NOT PRESENT)**

20          THE COURT: You may all be seated.

21                       We are out of the presence of the jury.

22                       Mr. Bobier.

23          MR. BOBIER: Good afternoon, Your Honor. I spoke  
24 with counsel over the break. Just to try to move things  
25 along, just a few more exhibits that counsel are willing to

1 stipulate as admissible.

2 THE COURT: Terrific.

3 MR. BOBIER: Those will be GG32 through 39 and  
4 also GG39a.

5 THE COURT: All right. GG32 through 39 and GG39a  
6 are admitted.

7 MR. BOBIER: Thank you, Your Honor.

8 THE COURT: All right. And so we're pulling our  
9 witness back up to the witness stand? Yes? Okay.

10 I'm going to take a moment off the bench and then  
11 come back.

12 COURTROOM DEPUTY: All rise.

13 1:27 p.m.

14 **IN OPEN COURT**

15 **(JURY PRESENT)**

16 THE COURT: You may all be seated.

17 Mr. Thompson. You may continue.

18 MR. THOMPSON: Thank you, Your Honor.

19 BY MR. THOMPSON:

20 Q. Welcome back.

21 A. Thank you.

22 Q. I'm going to show you now what's been marked, but not  
23 yet admitted, as Government Exhibit B25. And is this an  
24 email that you sent on August 3rd, 2021?

25 Yes?

1 A. Yes.

2 Q. And you sent it to claims at Feeding Our Future and  
3 Aimee at Feeding Our Future; is that correct?

4 A. Yes.

5 MR. THOMPSON: Okay. Your Honor, I move to admit  
6 Government Exhibit B25.

7 THE COURT: Any objection?

8 MR. COLICH: No objection.

9 THE COURT: B25 is admitted.

10 BY MR. THOMPSON:

11 Q. All right. Ms. Moalim, I want to show you here this  
12 email. That's sent from your email address; is that right?

13 A. Yes.

14 Q. You sent this email?

15 A. I'm not sure.

16 Q. Okay. And it's to claims@feedingourfuturemn.org and  
17 aimee@feedingourfuturemn.org.

18 Do you know what Feeding Our Future is?

19 A. Yes.

20 Q. What is it?

21 A. The one that's funding the program.

22 Q. The company that's funding the program?

23 A. Yes.

24 Q. And what program are you referring to?

25 A. Food program.

1 Q. The food program?

2 A. Yes.

3 Q. And that's the one where you were scanning all the  
4 papers for defendants Salim Said and others?

5 A. Yes.

6 Q. And the subject line of this email is Invoices. And it  
7 says there's an attachment to it; is that correct?

8 A. Yes.

9 Q. And the attachment is titled Invoices for Safari  
10 Sites.pdf. The Safari sites, what does that mean?

11 A. Safari Restaurant.

12 Q. Safari Restaurant?

13 A. Yes.

14 Q. And that's the restaurant that defendant Said is part  
15 owner of?

16 A. Yes.

17 Q. And I'm directing your attention to the second page of  
18 this exhibit. This attachment, it's a single PDF document,  
19 correct?

20 A. Yes.

21 Q. And it contains a series of invoices. And the first one  
22 here at page 2 is from Safari Restaurant billed to Feeding  
23 Our Future; is that right?

24 A. Yes.

25 Q. And the date is July 31st of 2021. It's invoice

1 Number 4005, and there's a site name above Feeding Our  
2 Future; is that right?

3 A. Yes.

4 Q. What site does this invoice relate to?

5 A. Stigma-Free, Mankato.

6 Q. And then each day how much does this invoice bill from  
7 Safari Restaurant to Feeding Our Future?

8 A. 14,220.

9 Q. Dollars?

10 A. Dollars.

11 Q. For serving breakfast and lunch to 2,000 kids every day?

12 A. Yes.

13 Q. And that goes on each and every day of July 2021,  
14 correct?

15 A. Yes.

16 Q. And the total amount of this invoice that you sent to  
17 Feeding Our Future in this Government Exhibit B25 for the  
18 Stigma-Free, Mankato site is \$440,000; is that right?

19 A. Yes.

20 Q. Similar to some of the, many of the other invoices that  
21 you scanned and submitted and sent?

22 A. Yes.

23 Q. And this document, Invoices For Safari Sites, continues  
24 at page 4 of Government Exhibit B25 where there's an invoice  
25 for a site called Stigma-Free, Willmar; is that right?

1 A. Yes.

2 Q. Is that one of the sites that we talked about earlier?

3 A. Yes.

4 Q. And looked at the meal counts? On this invoice dated  
5 July 31st, 2021, how much is Safari Restaurant billing  
6 Feeding Our Future each day for the Stigma-Free, Willmar  
7 site?

8 A. 14,220.

9 Q. For how many, for serving how many breakfasts and  
10 lunches each day?

11 A. 2,000.

12 Q. And turning to page 5, the bottom of the invoice, how  
13 much does Safari Restaurant bill Feeding Our Future for  
14 meals purportedly served at the Stigma-Free, Willmar site in  
15 July of 2021?

16 A. 440,820.

17 Q. Now page 6 is another invoice that's a part of this PDF  
18 document, correct?

19 A. Yes.

20 Q. And again, it's from Safari Restaurant to Feeding Our  
21 Future?

22 A. Yes.

23 Q. For July of 2021?

24 A. Yes.

25 Q. What site is this, does this invoice relate to?

1 A. Brava.

2 Q. Are you familiar with Brava Restaurant?

3 A. Yes.

4 Q. How are you familiar with Brava Restaurant?

5 A. We also do payrolls for them.

6 Q. At Total Financial Solutions?

7 A. Yes.

8 Q. Was Brava Restaurant involved in the food program?

9 A. Yes.

10 Q. How do you know that?

11 A. They will bring the same rosters and scan it.

12 Q. They brought paperwork for you to scan?

13 A. Yes.

14 Q. Who brought you the paperwork?

15 A. It depends.

16 Q. Okay. Different people?

17 A. Different.

18 Q. When those people would come bring you the paperwork,  
19 where would they bring it?

20 A. From the restaurant.

21 Q. From Brava Restaurant?

22 A. Yes.

23 Q. And where would they deliver it to you?

24 A. In the office.

25 Q. At Total Financial Solutions?

1 A. Yes.

2 Q. Would the people from Brava Restaurant meet with anyone  
3 at 2722 Park when they brought you the paperwork for the  
4 food program?

5 A. Yes.

6 Q. Who would they meet with?

7 A. Salah, Fish, Salim Said.

8 Q. This invoice here, page 6 of Government Exhibit B25, how  
9 much is billed each day by Safari Restaurant to Feeding Our  
10 Future for meals purportedly served at Brava Restaurant?

11 A. 14,220.

12 Q. 2,000 breakfast and lunches a day?

13 A. Yes.

14 Q. Same as the other two invoices for Stigma-Free, Willmar  
15 and Stigma-Free, Mankato?

16 A. Yes.

17 Q. And at page 7 the same total amount for that month being  
18 billed by Safari Restaurant to Feeding Our Future, correct?

19 A. Yes.

20 Q. Just over \$440,000 for that month?

21 A. Yes.

22 Q. Page 8, this document invoice is for Safari sites  
23 continues with another invoice from Safari Restaurant to  
24 Feeding Our Future; is that right?

25 A. Yes.

1 Q. What site does this invoice relate to?

2 A. Olive Management.

3 Q. How does it compare to the other invoices we've just  
4 looked at?

5 A. The same.

6 Q. Same number of meals a day?

7 A. Yes.

8 Q. 2,000?

9 A. Yes.

10 Q. Same amount billed each day, 14,220?

11 A. Yes.

12 Q. And at page 9, the same total amount billed by Safari  
13 Restaurant to Feeding Our Future for Olive Management in  
14 July 2021?

15 A. Yes.

16 Q. Just over \$440,000?

17 Page 10 is another invoice, Safari Restaurant to  
18 Feeding Our Future. This is for a different site?

19 A. Yes.

20 Q. We talked about this site earlier this morning before  
21 lunch?

22 A. Yes.

23 Q. ASA Limited?

24 A. Yes.

25 Q. Another site that you received meal counts for?

1 A. Yes.

2 Q. How does this invoice compare to the others that you  
3 sent to Feeding Our Future in this email?

4 A. The same.

5 Q. 2,000 breakfast and lunch every day?

6 A. Yes.

7 Q. For July of 2021; is that correct?

8 A. Yes.

9 Q. \$14,220 billed per day by Safari Restaurant?

10 A. Yes.

11 Q. And again, Safari Restaurant for the month of July 2021  
12 billing \$404,000 and change to Feeding Our Future for meals  
13 purportedly served at the ASA Limited site?

14 A. Yes.

15 Q. Is that right?

16 Going back to page 1 of this, you sent this in to  
17 Feeding Our Future, is that right, these invoices?

18 A. I am not sure if it was me or somebody else.

19 Q. Okay. I take it these weren't -- well, you have seen  
20 invoices like that; is that correct?

21 A. Yes.

22 Q. Where have you seen invoices like this?

23 A. In the office.

24 Q. Where were they created?

25 A. I don't know.

1 Q. Okay. Now, the attachment was invoices for Safari  
2 sites, and I think you explained that relates to Safari  
3 Restaurant.

4 You spoke earlier this morning about the Safari  
5 room; is that right?

6 A. Yes.

7 Q. At 2722 Park?

8 A. Yes.

9 Q. Remind us again. What's the Safari room?

10 A. That's whatever happens in Safari.

11 Q. Safari Restaurant?

12 A. Yes.

13 Q. Does that include the food program and these food sites?

14 A. That's the office.

15 Q. Okay. And who used that office space, that room, the  
16 Safari room?

17 A. Safari owners.

18 Q. And who are?

19 A. Fish, Blackie.

20 Q. Defendant Said?

21 A. Who?

22 Q. Salim Said?

23 A. Yeah.

24 Q. When you say "Blackie"?

25 A. Yes.

1 Q. I'm showing you now what's been admitted as Government  
2 Exhibit FF1. And there's a series of photographs here taken  
3 at 2722 Park. This is a view of the back of the building;  
4 is that right?

5 A. Yes.

6 Q. TFS here at page 5, that's Total Financial Solutions?

7 A. Yes.

8 Q. Suite 100?

9 A. Yes.

10 Q. I'm going to direct your attention here. Do you  
11 recognize this picture at page 11 of Government Exhibit FF1?

12 A. Yes.

13 Q. What is it?

14 A. The meeting, community room.

15 Q. I'm sorry. What's that?

16 A. The meeting room.

17 Q. The meeting room?

18 A. Yes.

19 Q. Is this the room you called the Safari room?

20 A. No.

21 Q. What's the room you called the Safari room?

22 A. It's the other one.

23 Q. The other one. Would you see it if I page through here?  
24 This one?

25 A. This one, yeah.

1 Q. At page 14?

2 A. Yes.

3 Q. That looks like there's paperwork in the corner; is that  
4 right?

5 A. Yes.

6 Q. Of this photograph?

7 A. Yes.

8 Q. And I believe if you look at page 13, you see some of  
9 that paperwork; is that right?

10 A. Yes.

11 Q. This one's Mankato Restaurant, Horseed  
12 Management/Stigma-Free correct?

13 A. Yes.

14 Q. You talked a little bit about Brava Restaurant; is that  
15 right?

16 A. Yes.

17 Q. I'm going to show you what's been marked, but not  
18 admitted, as Government Exhibit N9. And is this an email  
19 that you sent to bravarestaurant@gmail.com?

20 A. Yes.

21 Q. On September 6th of 2021?

22 A. Yes.

23 Q. And directing your attention to page 2, what is  
24 attached --

25 Well, I'll move to admit Government Exhibit N9,

1 Your Honor.

2 THE COURT: Any objection?

3 MR. UDOIBOK: No objection.

4 MR. COLICH: No objection.

5 THE COURT: N9 is admitted.

6 MR. THOMPSON: Thank you.

7 BY MR. THOMPSON:

8 Q. Ms. Moalim, is this the email you sent here at page 1 of  
9 Government Exhibit N9?

10 A. Yes.

11 Q. Correct? Okay. On September 6th of 2021?

12 A. Yes.

13 Q. And directing your attention to page 2, there's meal  
14 count sheets, 2,000 a day; is that right?

15 A. Yes.

16 Q. The site name is blank here, though; is that correct?

17 A. Yes.

18 Q. I believe if we page down to page 9, it's filled in,  
19 though. What site does this relate to?

20 A. Brava Restaurant.

21 Q. And it looks like the supervisor name is Sharmake Jama?

22 A. Yes.

23 Q. Are you familiar with that person?

24 A. Yes.

25 Q. Who is he?

1 A. One of the owners.

2 Q. Of?

3 A. Brava Restaurant.

4 Q. Would he come to Total Financial Solutions when you  
5 worked there?

6 A. Yes.

7 Q. What would he do when he got there?

8 A. Once in a while he will meet with Salah.

9 Q. Salah. Okay. Would he ask you to do things?

10 A. Scan the papers.

11 Q. Okay. Were there other individuals that worked for  
12 Brava Restaurant?

13 A. Yes.

14 Q. Would they come as well?

15 A. Yes.

16 Q. Who would they meet with?

17 A. Salah.

18 Q. Would they meet with anyone when they came?

19 A. Salah.

20 Q. Okay. I'm going to show you now what's been marked, but  
21 not admitted, as Government Exhibit N19. Is this another  
22 email that you sent on January 7, 2012 {sic}?

23 A. Yes.

24 MR. THOMPSON: Your Honor, I move to admit  
25 Government Exhibit N19.

1 MR. COLICH: No objection.

2 MR. UDOIBOK: No objection.

3 THE COURT: N19 is admitted.

4 BY MR. THOMPSON:

5 Q. Ms. Moalim, who -- could you describe this email for us?

6 Did you send -- who did you send this email to?

7 A. Abdulkadir Salah.

8 Q. And what's his nickname?

9 A. Fish.

10 Q. And the subject line here is Bet on Better Future. Are  
11 you familiar with Bet on Better Future?

12 A. Food program.

13 Q. It's a food program company?

14 A. Yes.

15 Q. Okay. If I look here, I direct your attention to  
16 page 61. This is some of the attachments here. This is  
17 another meal count sheet; is that right?

18 A. Yes.

19 Q. Did someone ask you to scan these?

20 A. Yes.

21 Q. And the site name here is Bet on Better Future/ASA  
22 Limited.

23 A. Yes.

24 Q. Did Bet on Better Future have a relationship with ASA  
25 Limited?

1 A. I don't know.

2 Q. You don't know. Similar meal counts for ASA Limited  
3 here in December of 2021; is that right?

4 A. Yes.

5 Q. 1800 a day?

6 A. Yes.

7 Q. And at page 125 of this exhibit is another, more of the  
8 attachments to this email. There's an after-school meal  
9 count for Bet on Better Future/Gaur, G-A-U-R. What's Gaur?

10 A. Another food site.

11 Q. You've seen that one before?

12 A. Yes.

13 Q. When did you see it?

14 A. Towards the end of 2021.

15 Q. Towards the end of 2021?

16 A. Yes.

17 Q. And you saw it through the food papers?

18 A. Yes.

19 Q. Were you asked to scan meal count sheets and other forms  
20 related to the Gaur site?

21 A. Yes.

22 Q. Did they look similar to this one here, 1800 a day?

23 A. Yes.

24 Q. Day after day?

25 A. Yes.

1 Q. Page 195 of this exhibit, there's meal count sheets for  
2 Bet on Better Future/Safari. Is that the Safari Restaurant  
3 site?

4 A. Yes.

5 Q. Just paging through here, how many meals do these meal  
6 count sheets claim were distributed at the Safari Restaurant  
7 site each day in December 2021?

8 A. 3,100.

9 Q. Typical of the claims you would see for Safari  
10 Restaurant?

11 A. Yes.

12 Q. This one lists, and all these list, before the site name  
13 Bet on Better Future. Do you recall why that is?

14 A. No.

15 Q. Okay. I'm going to show you now what's been marked, but  
16 not yet admitted, as Government Exhibit N17. Is this  
17 another email where you scanned meal count sheets to  
18 yourself, this time on January 4th, 2022?

19 A. Yes.

20 MR. THOMPSON: Your Honor, I move to admit  
21 Government Exhibit N17.

22 MR. COLICH: No objection.

23 MR. UDOIBOK: No objection.

24 THE COURT: N17 is admitted.  
25

1 BY MR. THOMPSON:

2 Q. And you see on the first page that's the scan email?

3 A. Yes.

4 Q. And directing your attention to page 3 of the exhibit,  
5 the attachment is a meal count sheet for a site called Bet  
6 on Better, Rochester; is that right?

7 A. Yes.

8 Q. How many meals are listed every day there?

9 A. 2500.

10 Q. And on page 2 there's a different site called Bet on  
11 Better Future/Southcross. Are you familiar with Southcross?

12 A. Yes.

13 Q. What's Southcross?

14 A. Food program.

15 Q. Another food site?

16 A. Yes.

17 Q. Were you asked to scan and email documents related to  
18 the Southcross site?

19 A. Yes.

20 Q. Did they look similar to these in terms of large round  
21 numbers?

22 A. Yes.

23 Q. You said earlier that part of your job was payroll and  
24 cutting checks; is that right?

25 A. Yes.

1 Q. And I think you testified that people would come to  
2 Total Financial Solutions, people who were involved in the  
3 food program, to pick up checks; is that right?

4 A. Yes.

5 Q. What were those checks like?

6 A. Regular checks.

7 Q. Yeah. Were they big checks, small checks?

8 A. Paychecks, no. Paychecks.

9 Q. Were there checks that were large and not paycheck-like?

10 A. Yes.

11 Q. You are making a face. I know it's hard to talk about.  
12 Can you tell us about the large checks that you saw when you  
13 worked at Total Financial Solutions?

14 A. How?

15 Q. What did you see?

16 A. Big numbers.

17 Q. Big numbers?

18 A. Yes.

19 Q. Like how big were the checks?

20 A. 400, 500.

21 Q. Four or five hundred thousand dollars?

22 A. Yes.

23 Q. Were they related to the food program?

24 A. Yes.

25 Q. Was that surprising to you?

1 A. Yes.

2 Q. Did you ever receive a check like that?

3 A. Received?

4 Q. Yeah.

5 A. No.

6 Q. Okay. You just worked there.

7 A. Yes.

8 Q. Are you familiar with a company called Salim Limited?

9 A. Yes.

10 Q. Whose company is Salim Limited?

11 A. Salim Said.

12 Q. Okay. I'm going to show you -- I'm going to show you  
13 what's been marked as Government Exhibit T3. And is this an  
14 email that you received from Salim Said?

15 A. Yes.

16 Q. On February 3rd, 2021?

17 A. Yes.

18 MR. THOMPSON: Your Honor, I move to admit  
19 Government Exhibit T3.

20 MR. COLICH: No objection.

21 MR. UDOIBOK: No objection.

22 THE COURT: T3 is admitted.

23 BY MR. THOMPSON:

24 Q. Ms. Moalim, this email was sent from Salim Said, and the  
25 email account salimsaid4040@gmail.com. That's Defendant

1 Said here, correct?

2 A. Yes.

3 Q. Sent to you?

4 A. Yes.

5 Q. And the subject line is Salim Limited.pdf, correct?

6 A. Yes.

7 Q. And attached to it is a Certificate of Organization  
8 filed with the Minnesota Secretary of State; is that right?

9 A. Yes.

10 Q. For Salim Limited LLC?

11 A. Yes.

12 Q. And does it show who organized Salim or Salim Limited  
13 LLC?

14 A. Yes.

15 Q. Who is that?

16 A. Salim Said.

17 Q. And directing your attention to the second page, when  
18 did he file the company, register the company?

19 A. June, July. July.

20 Q. July 30th, 2020?

21 A. Yes.

22 Q. Okay. You said you'd seen Salim Limited. You are  
23 familiar with it. Could you explain how so?

24 A. The owner.

25 Q. How did you know the company?

1 A. Payroll.

2 Q. Did you ever, did Mr. -- Defendant Said ever ask you to  
3 do something with respect to Salim Limited LLC?

4 A. Do payrolls.

5 Q. What did you do?

6 A. Did the payroll.

7 Q. Get him checks?

8 A. Yes.

9 Q. Did you see a lot of checks going into and out of the  
10 Salim Limited LLC account?

11 A. Not a lot.

12 Q. Okay. You saw a lot of checks generally, though, big  
13 checks?

14 A. Big checks, yes.

15 Q. Let's take a look. I'm going to show you what's been  
16 admitted as Government Exhibit W26. And these are records  
17 of a bank account held by Salim Limited LLC.

18 Do you see that? Salim Said's name, he's a  
19 signatory on the account?

20 A. Yes.

21 Q. And I'm going to direct your attention to page 18. And  
22 there's a series of checks that were deposited into the  
23 account. This first check is dated January 22nd, 2021, and  
24 it's to Salim Limited LLC. That's Defendant Said's company?

25 A. Yes.

1 Q. It's for \$135,000 from ASA Limited. What's ASA Limited?

2 A. It's one of the food programs.

3 Q. And that same page, there's also a check for \$70,000 to

4 Salim Limited LLC that same day January 22nd, 2021, from

5 Olive Management. Are you familiar with Olive Management?

6 A. Yes.

7 Q. What's Olive Management?

8 A. One of the food programs.

9 Q. And that same day, January 22nd, 2021, there's a check

10 for \$277,000 to Salim Limited from Cosmopolitan Business

11 Solutions. Are you familiar with Cosmopolitan Business

12 Solutions?

13 A. Yes.

14 Q. What is that?

15 A. Safari.

16 Q. Involved in the food program?

17 A. Yes.

18 Q. And on page 19, a couple weeks later there's a check

19 dated February 9th, 2021, for \$94,000 to Salim Limited from

20 Tunyar Trading. Are you familiar with Tunyar Trading?

21 A. Yes.

22 Q. What's Tunyar Trading?

23 A. One of the food programs.

24 Q. On page 20, there's a check on February 23rd, 2021, to

25 Salim Limited for \$130,000. That's from ASA Limited?

1 A. Yes.

2 Q. Food program site?

3 A. Yes.

4 Q. And on that same page 20, there's another check that  
5 same day, February 22nd, 2021, from Horseed Management LLC  
6 to Salim Limited for \$125,000. Are you familiar with  
7 Horseed Management?

8 A. Yes.

9 Q. What's Horseed Management?

10 A. One of the food programs.

11 Q. Those are the types of checks that you saw people  
12 picking up?

13 A. Yes.

14 Q. When you worked at Total Financial Solutions?

15 A. Yes.

16 Q. Ms. Moalim, I'm going to ask you a few more questions  
17 here. Okay?

18 Did something stressful happen on January 20th of  
19 2022?

20 A. Yes.

21 Q. What happened that day?

22 A. You guys came to us.

23 Q. Okay. Can you tell us what happened, how you  
24 experienced that day?

25 A. It was crazy.

1 Q. How did you learn that the FBI was searching 2722 Park,  
2 correct?

3 A. Yes.

4 Q. They had a search warrant?

5 A. Yes.

6 Q. How did you learn about the search warrant that day?

7 A. I received a phone call from Salah early morning,  
8 telling me to open the doors because there's some people  
9 outside.

10 Q. Your boss called you?

11 A. Yes.

12 Q. He told you that you should go to work and open the  
13 doors?

14 A. Yes.

15 Q. And he told you because some people were outside?

16 A. Yes.

17 Q. Did he tell you who those people were?

18 A. No.

19 Q. So did you do it?

20 A. He just said they were from the government, they need  
21 something. So before they knock down the door, just open  
22 the door.

23 Q. Okay. And did you go to 2722 Park?

24 A. Yes.

25 Q. What did you see when you got there?

1 A. A lot of FBIs.

2 Q. Okay. When you saw the FBI agents were at 2722 Park,  
3 did you have some sense of why they were there?

4 A. Not at first, but after they start giving me the papers.

5 Q. What was your -- what did you think, and I know we've  
6 talked about this before, right?

7 A. Mm-hmm.

8 Q. When you saw the FBI there that day, what did you think  
9 was going on and why they were there?

10 I know it's hard to talk about.

11 A. I knew.

12 Q. What did you know?

13 A. Like when they give me the paper, it's like, oh, okay.

14 Q. What did you know?

15 A. No.

16 Q. What occurred to you? When you say, "Oh, okay"?

17 A. Like the paper, they showed me the papers, the rosters  
18 and the checks, the big checks. They are like, are you  
19 familiar with this? It was like, oh, that's why.

20 Q. That's why what?

21 A. That's why they're here.

22 Q. All the big checks?

23 A. Mm-hmm.

24 Q. All the identical-looking meal counts?

25 A. Yes.

1 Q. The secret meetings in the Safari room?

2 A. Yes.

3 MR. THOMPSON: Thank you. No further questions,  
4 Your Honor.

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

6 MR. UDOIBOK: Yes.

7 CROSS-EXAMINATION

8 BY MR. UDOIBOK:

9 Q. Ms. Moalim, my name is Kenneth Udoibok. I have a few  
10 questions for you.

11 Did you ever receive any meal count from Ms. Bock?

12 A. No.

13 Q. Do you ever write a check to Ms. Bock?

14 A. Not that I know.

15 Q. Okay. And your job was to enter data, scan, enter data  
16 in the computer?

17 A. Yes.

18 Q. And were you, you consider yourself an accountant?

19 A. Yes.

20 Q. Okay. Have you worked in the food program?

21 A. No.

22 Q. Have you -- I'm just curious. Have you gone to Feeding  
23 Our Future building before?

24 A. No.

25 MR. UDOIBOK: No further questions.

1 THE COURT: Mr. Colich.

2 MR. COLICH: Thank you, Your Honor.

3 CROSS-EXAMINATION

4 BY MR. COLICH:

5 Q. Good afternoon.

6 A. Good afternoon.

7 Q. My name is Mike Colich, along with Mr. Montez. Can you  
8 see him?

9 A. Yes.

10 Q. We're representing Mr. Said. And he know Mr. Said,  
11 correct?

12 A. Yes.

13 Q. Okay. So you worked for Total Financial Solutions?

14 A. Yes.

15 Q. And am I correct that Fish and Salah were the owners?

16 A. Yes.

17 Q. So let me make sure we get the names straight. Okay?

18 A. Okay.

19 Q. So you know Fish is Abdulkadir Nur Salah?

20 A. Yes.

21 Q. And do you know Salah by the name to be Ahmed  
22 Omar-Hashim?

23 A. Yes.

24 Q. And they're brothers, correct?

25 A. Yes.

1 Q. There's another brother named Abdi Nur Salah. You know  
2 who that is?

3 A. Yes.

4 Q. And you know where he worked at one time?

5 A. The mayor?

6 Q. Okay. Thank you.

7 And then you had mentioned Said Salah. That's the  
8 fourth brother, correct?

9 A. Yes.

10 Q. Okay. Now this is the first time we've met, right?

11 A. Yes.

12 Q. And it's the first time you saw Mr. Montez?

13 A. Yes.

14 Q. Myself, Mr. Montez, Salim Said, we weren't at the grand  
15 jury when you testified, were we?

16 A. No.

17 Q. So this is my first chance to talk to you. Not going to  
18 take long either. Okay?

19 A. Okay.

20 Q. All right. So you started working at Total Financial  
21 Solutions when?

22 A. Fall of 2020.

23 Q. Okay. Would that be around October, or do you know for  
24 sure?

25 A. Maybe August. I'm not sure.

1 Q. Okay. And you ended up working there till August 2022?

2 A. Yes.

3 Q. Did I get that right?

4 A. Yes.

5 Q. Okay. And you did all types of work for Total Financial  
6 Solutions; is that true?

7 A. Yes.

8 Q. And they do, among other things, auditing?

9 A. Yes.

10 Q. Business consultation?

11 A. Yes.

12 Q. Bookkeeping?

13 A. Yes.

14 Q. Business planning?

15 A. Yes.

16 Q. Things like that?

17 A. Yes.

18 Q. And did you observe them doing that at that location,  
19 doing those things?

20 A. I heard their people do other stuff.

21 Q. Okay.

22 A. But my job was the payroll.

23 Q. All right. And is it your understanding that a lot of  
24 the people that the prosecutor has talked with you today  
25 about from the different sites were also customers of Total

1 Financial Services?

2 A. Yes.

3 Q. So they all had a relationship at one time or another  
4 with Total Financial Services?

5 A. Yes.

6 Q. And that would be with the two brothers?

7 A. Yes.

8 Q. Is that correct? All right. Now, you testified at the  
9 grand jury; is that correct?

10 A. Yes.

11 Q. And then you met with U.S. Attorneys and agents from the  
12 FBI and other agencies on two different occasions. Do you  
13 recall that?

14 A. Yes.

15 Q. Okay. And so I want to talk to you a little bit about  
16 some of the things you talked to them about to make sure we  
17 cover everything today for the jury.

18 A. Okay.

19 Q. All right? So do you recall when you met with them  
20 being asked whether or not someone has to approve all the  
21 checks before they go out?

22 A. Yes.

23 Q. And who did you say was the two people that had to do  
24 that?

25 A. Not two people. I say whoever is in charge of the

1 company, the owner of that company.

2 Q. Okay. So do you recall telling them that Abdulkadir  
3 Salah and Ahmed Sharif Omar-Hashim first had to approve any  
4 of the checks that were being written and sent out?

5 A. I am not sure I say that.

6 Q. Well, if it's reported by an FBI agent in his report, is  
7 there any reason that you wouldn't believe that?

8 A. I'm not sure I say that.

9 Q. Okay. They're the two owners.

10 A. They are.

11 Q. Checks had to be approved before they are sent out,  
12 correct?

13 A. Everybody's companies, the owner of those companies,  
14 yes.

15 Q. Just want to make sure that, you don't remember telling  
16 the agents and U.S. Attorneys that, or you do remember?

17 MR. THOMPSON: Objection. Improper impeachment,  
18 Your Honor.

19 THE COURT: Sustained.

20 BY MR. COLICH:

21 Q. So let's talk a little bit more about some things that I  
22 think that we may get clarity on. Okay?

23 Were the brothers in charge of Total Financial  
24 Services?

25 A. Yes.

1 Q. And do you recall telling the government that they  
2 coordinated and had to look at all the paperwork that you  
3 submitted regarding the checks?

4 MR. THOMPSON: Objection. Improper impeachment.

5 THE COURT: Sustained.

6 BY MR. COLICH:

7 Q. Did you have to have approval by the two owners before  
8 you could process the paperwork?

9 A. Which paperworks? Do you talk about checks?

10 Q. I'm just relying on what I've read about things that  
11 have been said.

12 MR. THOMPSON: Objection, Your Honor. Improper  
13 impeachment.

14 THE COURT: Sustained.

15 BY MR. COLICH:

16 Q. Did you have to get approval by the owners before you  
17 submitted paperwork? Yes or no.

18 MR. THOMPSON: Objection. Vague as to which  
19 paperwork.

20 THE COURT: Overruled. She can answer if she can.

21 THE WITNESS: I just want to know which you talk.  
22 Is it the rosters or the checks?

23 BY MR. COLICH:

24 Q. Any of the paperwork.

25 A. Any of the paperwork?

1 Q. Yes.

2 A. The checks, obviously Salah has to, I have to do the  
3 checks for each company, and he told me each company, the  
4 owners can contact me. And as for the rosters, each company  
5 bring in their own stuff, and I send it to whoever they  
6 want.

7 Q. Okay. All right. Thank you.

8 When someone would come there to Total Financial  
9 Services, is there one particular person they would look for  
10 to get answers?

11 A. Yes.

12 Q. Who was that?

13 A. Salah.

14 Q. Salah?

15 A. Yes.

16 Q. Nickname Salah?

17 A. Omar-Hashim.

18 Q. Omar-Hashim. Do you know the name Abdihakim Ali Ahmed?

19 A. Yes.

20 Q. And do you know what site he owned?

21 A. ASA.

22 Q. The ASA Limited?

23 A. Yes.

24 Q. All right. And is it correct that he was the one that  
25 would provide you the meal counts and the receipts and the

1 rosters?

2 A. For ASA?

3 Q. Yes.

4 A. Yes.

5 Q. Okay. And you have, you are familiar with Stigma-Free  
6 International?

7 A. Yes.

8 Q. At least the name of the company?

9 A. Yes.

10 Q. And this morning you were talking about a lot of the  
11 paperwork, meal counts and other things that were submitted  
12 to you from some of the Stigma-Free sites. You recall that?

13 A. Yes.

14 Q. And do you know who Ahmed Mohamed Artan is?

15 A. No.

16 Q. No?

17 A. Who?

18 Q. Ahmed Mohamed Artan.

19 A. I don't remember.

20 Q. Okay. Do you know who owned Stigma-Free International?

21 MR. THOMPSON: Objection, Your Honor. You can't  
22 own a nonprofit.

23 BY MR. COLICH:

24 Q. Do you know who registered that company with the State?

25 A. I don't remember.

1 Q. No? So you don't know Ahmed Mohamed Artan, correct?

2 A. I don't know.

3 Q. But you do know Abdulkadir Nur Salah, right?

4 A. Yes.

5 Q. And you do know Abdi Nur Salah, correct?

6 A. Yes.

7 Q. And it was your testimony again that -- were it

8 generally the people that were running the sites,

9 Stigma-Free sites, they would come in with the documents?

10 A. Yes.

11 Q. And that's how you got to learn who some of the owners

12 of the sites were?

13 A. Yes.

14 Q. And you testified a little bit about Bet On A Better

15 Future?

16 A. Yes.

17 Q. Do you know who owned that?

18 A. Is it Abdulkadir? I don't know.

19 Q. Do you recall testifying at the grand jury about who

20 owned Bet On A Better Future?

21 A. I don't remember every single person. That was long

22 time ago.

23 Q. Long time ago.

24 Your Honor, may I just have a moment or two?

25 THE COURT: You may.

1 MR. COLICH: Your Honor, may I approach the  
2 witness for purposes of refreshing her memory?

3 THE COURT: Yes.

4 MR. COLICH: 46 and 47.

5 I'm going to ask you, if you would, don't read out  
6 loud.

7 I'm showing you a document which identifies you as  
8 the person testifying at the federal grand jury. Do you  
9 recognize your name?

10 THE WITNESS: Yes.

11 BY MR. COLICH:

12 Q. Okay. And you did testify there?

13 A. Yes.

14 Q. So I'm going to ask you. I'm directing U.S. Attorneys,  
15 as well as you, to page 46 and 47.

16 And there's a series of questions starting, I'll  
17 just draw a line right there (indicating).

18 Counsel, it's about three-quarters of the way down  
19 where it refers to Bet On A Better Future.

20 If you could read that, and there's a point here  
21 where it talks about ownership. If you could read all that,  
22 I would appreciate it. Take your time.

23 Okay. Thank you.

24 Does that refresh your recollection of what you  
25 said at the grand jury?

1 A. Yes.

2 Q. Okay. And can you tell us who owned Bet On A Better  
3 Future?

4 A. Abdulkadir Salah.

5 MR. COLICH: No other questions.

6 THE COURT: Mr. Thompson.

7 MR. THOMPSON: Thank you, Your Honor.

8 REDIRECT EXAMINATION

9 BY MR. THOMPSON:

10 Q. All right. Almost done for real this time.

11 Mr. Colich just asked you some questions about, if  
12 I understood him correctly, kind of probing at the  
13 relationship between Salim Said and these various entities  
14 that were involved in the food program.

15 Does that sound kind of like what he was getting  
16 at?

17 A. Yes.

18 Q. Okay. And he asked about Stigma-Free International; is  
19 that right?

20 A. Yes.

21 Q. Now Stigma-Free had a bunch of the sites, correct?

22 A. Yes.

23 Q. One of them was in Mankato?

24 A. Yes.

25 Q. If I recall correctly, it had another name Horseed

1 Management; is that right?

2 A. Yes.

3 Q. That was related to that --

4 A. Yes.

5 Q. -- Mankato site?

6 And I just want to direct your attention to  
7 Government Exhibit W25, which is a Salim Said bank account  
8 records. And at page 23, there's a check from Horseed  
9 Management referring to the Stigma-Free, Mankato site to  
10 Salim Said's company Salim Limited; is that right?

11 A. Yes.

12 Q. On February 8th, 2021?

13 A. Yes.

14 Q. And the amount of the check from Horseed Management is  
15 \$155,000. Now, do you know why Horseed Management  
16 Stigma-Free, Mankato was paying \$155,000 to Salim Said's  
17 company on February 8th, 2021?

18 A. No.

19 Q. Another one February 22nd, \$229,000 from Olive  
20 Management to Salim Limited. Food site?

21 A. Yes.

22 Q. Do you know why Olive Management, the food site, was  
23 paying \$229,000 to Salim Said's LLC, Salim Limited, on  
24 February 22nd, 2021?

25 A. No.

1 Q. Same page. Brava Restaurant, February 17th, 2021, wrote  
2 a check for \$42,000 to Salim Said's entity Salim Limited  
3 LLC.

4 Do you know why Brava Restaurant was writing Salim  
5 Said's LLC a check for \$42,000?

6 A. No.

7 Q. Now, the owners of these companies, Horseed Management,  
8 Olive Management, Brava Restaurant, did they know Salim  
9 Said?

10 A. Yes.

11 Q. Did they come talk to him?

12 A. Yes.

13 Q. Where did they come talk to him?

14 A. Safari room.

15 Q. At your work?

16 A. Yes.

17 Q. Those days they would come to talk to Salim Said, would  
18 they give you anything?

19 A. Not every time.

20 Q. But when they would come to 2722 Park, what did they  
21 have in their hands when they had stuff in their hands?

22 A. Maybe cut the checks.

23 Q. Checks?

24 A. Yeah.

25 Q. Did they have papers for you to scan?

1 A. Yes.

2 Q. What did those papers have to do with?

3 A. Because it was the end of the month.

4 Q. Yeah, but what did they give you to scan?

5 A. The rosters.

6 Q. Meal counts?

7 A. Meal counts.

8 Q. For these sites?

9 A. Yes.

10 Q. And then they would go meet with Salim Said?

11 A. Yes.

12 Q. And Abdulkadir Salah?

13 A. Yes.

14 Q. Fish, his partner?

15 A. Yes.

16 Q. Thank you.

17 MR. THOMPSON: No further questions, Your Honor.

18 THE COURT: Mr. Colich.

19 MR. COLICH: I have nothing further.

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

21 MR. THOMPSON: Your Honor, with permission, may I  
22 step out for a moment, just so my colleagues can continue.

23 THE COURT: Yes, you may.

24 And the government may call its next witness.

25 MR. BOBIER: Your Honor, the government calls

1 Jessica Woodbridge.

2 THE COURT: Good afternoon. I'll have you come  
3 all the way up here to the witness stand.

4 Would you stand before me to take the oath.

5 JESSICA WOODBRIDGE,

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

8 THE WITNESS: I do.

9 THE COURT: Thank you. You may be seated.

10 And when you are settled, would you please state  
11 and spell both your first and last name for the record.

12 THE WITNESS: Sure. It's Jessica Woodbridge.

13 J-E-S-S-I-C-A. Woodbridge W-O-O-D-B-R-I-D-G-E.

14 THE COURT: Thank you.

15 Mr. Bobier, you may inquire.

16 MR. BOBIER: Thank you, Your Honor.

17 DIRECT EXAMINATION

18 BY MR. BOBIER:

19 Q. Good afternoon, Ms. Woodbridge.

20 A. Hi.

21 Q. How are you?

22 A. Good.

23 Q. Could you tell the jury what you do for a living,  
24 please?

25 A. Sure. I am a vice president, consumer resolution

1 associate, with Bank of America NA.

2 Q. How long have you worked at the bank?

3 A. Since September of 2012.

4 Q. How do you like it?

5 A. Great.

6 Q. Do you live in the State of Minnesota?

7 A. I do not.

8 Q. Where do you live?

9 A. In Dallas, Texas.

10 Q. Come up here to testify?

11 A. Yes.

12 Q. Little colder up here?

13 A. Yes.

14 Q. I want to ask you just a few questions today. It will  
15 be pretty brief. Okay?

16 A. Okay.

17 Q. First, are you familiar at a high level with how the  
18 computer systems operate at Bank of America when an account  
19 holder at your bank sends a wire?

20 A. Yes.

21 Q. And at a high level, a wire is just a transfer of funds;  
22 is that right?

23 A. Yes.

24 Q. Do you know, those computer systems that your bank uses  
25 when a customer sends a wire, if I call it a server, is that

1 your understanding of what that system is?

2 A. Yes.

3 Q. Do you know where their servers are located  
4 geographically?

5 A. Yes.

6 Q. Where are they located?

7 A. In Richmond, Virginia; Richardson, Texas; and Kansas  
8 City, Missouri.

9 Q. And is that where those servers were located in 2020  
10 through 2022?

11 A. Yes.

12 Q. So none of those servers that the bank uses to complete  
13 wire transfers, none of them are in Ohio?

14 A. That's correct.

15 Q. And none of them are here in Minnesota?

16 A. That's correct.

17 Q. Before I ask you just a bit more about those, are funds  
18 held at Bank of America insured by the FDIC?

19 A. Yes.

20 Q. Pretty standard for a big bank; is that right?

21 A. Yes.

22 Q. Let me show you something on the screen in front of you.  
23 It's W81, which is in evidence. This is in evidence as a  
24 record from your bank, Bank of America. You see that at the  
25 top here on the left?

1 A. Yes.

2 Q. And the account title of this bank is Afrikan Village  
3 LLC; is that right?

4 A. Yes.

5 Q. It's a checking account?

6 A. Yes.

7 Q. And we go down to the bottom of this bank record, we see  
8 that there's one signatory on the account; is that right?

9 A. Yes.

10 Q. And the name there is Abdirahman Ahmed?

11 A. Yes.

12 Q. All right. Now, Ms. Woodbridge, this account ends in  
13 6629; is that right?

14 A. That's correct.

15 Q. All right. I'd like to show you one wire in particular  
16 from that account ending in 6629. This is Government  
17 Exhibit Z57, which is in evidence and corresponds to  
18 Count 57 in this case.

19 Can you see that document in front of you?

20 A. I can, yes.

21 Q. Have you had an opportunity to review bank records  
22 concerning this particular wire?

23 A. Yes.

24 Q. Do you know that this wire was completed?

25 A. Yes.

1 Q. Do you know where it was originated?

2 A. Yes.

3 Q. Where was it originated?

4 A. It was at a financial center located in Worthington,  
5 Ohio.

6 Q. At a financial center, you mean a brick and mortar bank?

7 A. Yes.

8 Q. Like a branch?

9 A. Yeah.

10 Q. So this went out, you can see in the top left, from the  
11 Afrikan Village LLC account we were just discussing; is that  
12 right?

13 A. Yes.

14 Q. On which we saw that one signer, Abdirahman Ahmed; is  
15 that right?

16 A. Yes.

17 Q. Could anyone but Mr. Ahmed have caused this wire to be  
18 sent out from the account, given that he was the only  
19 signatory?

20 A. No.

21 Q. Can you tell from the information on this page where  
22 this wire went?

23 A. Yes.

24 Q. Where did it go?

25 A. To Stewart Title Company, and it looks like a U.S. Bank

1 NA account.

2 Q. An account at U.S. Bank for something called Stewart  
3 Title Company?

4 A. Yes.

5 Q. In general, what's a title company?

6 A. My understanding is they facilitate real estate  
7 transactions.

8 Q. So I know you only have part of the records here, but  
9 based on what's available to you, fair to say it looks like  
10 this transfer is related to a real estate transaction,  
11 headed to a title company?

12 A. Yes.

13 Q. What's the total amount of the wire?

14 A. \$2,471,112.41.

15 Q. All right. You told us this wire was initiated at a  
16 brick and mortar bank location in Ohio. You mentioned those  
17 servers earlier that are in three different locations  
18 throughout the country.

19 Do you know whether this wire had to transfer  
20 through one of those servers to be completed?

21 A. Yes.

22 Q. Do you know which server in particular?

23 A. Yes.

24 Q. Which one?

25 A. The Richardson, Texas, servers were active on this

1 particular day.

2 Q. And again, you know the wire was completed, right?

3 A. Yes.

4 Q. It reached the title company accounts at U.S. Bank?

5 A. Yes.

6 Q. Okay. So this wire was initiated in Ohio, crossed state  
7 lines to get to the server in Texas, and ended up at the  
8 U.S. Bank account wherever their servers are; is that right?

9 A. Yes.

10 Q. Thank you.

11 MR. BOBIER: Nothing further, Your Honor.

12 THE COURT: Cross-examination?

13 MR. UDOIBOK: Nothing.

14 THE COURT: Mr. Colich?

15 MR. COLICH: No, Your Honor.

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

17 THE WITNESS: Thank you.

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

20 MR. EBERT: Thank you, Your Honor. The government  
21 calls Joshua Parks.

22 THE COURT: Raise your right hand.

23 JOSHUA PARKS,

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

1 THE WITNESS: Yes, I do, Your Honor.

2 THE COURT: Thank you. You may be seated, and  
3 when you are settled I will have you state and spell both  
4 your first and your last name for the record.

5 THE WITNESS: Yeah, my name is Joshua Parks. It's  
6 J-O-S-H-U-A. Parks, P-A-R-K-S.

7 THE COURT: Thank you.

8 Mr. Ebert, you may inquire.

9 MR. EBERT: All right. Thank you, Your Honor.

10 DIRECT EXAMINATION

11 BY MR. EBERT:

12 Q. Where do you work?

13 A. I work for the IRS.

14 Q. What do you do at the IRS?

15 A. I'm a special agent in the IRS criminal investigation  
16 group.

17 Q. And can you describe a little bit what your duties are  
18 with that part of IRS?

19 A. Yeah, I investigate potential white-collar crimes, that  
20 being fraud, money laundering, and obviously tax being in  
21 the IRS.

22 Q. How long have you been a special agent with the IRS?

23 A. I joined the IRS in July of 2023, and then I spent about  
24 six months in training at the federal law enforcement  
25 training center where you learn how to become a federal

1 agent. And so then after that six months, I joined the team  
2 here last February.

3 Q. And where is that training center located?

4 A. The training center is in Glynco, Georgia, so the south,  
5 I guess, east portion of Georgia, right along the coast.

6 Q. What did you do before you joined IRS in 2023?

7 A. Yeah. I spent ten years in the public sector or the  
8 private sector. Six of those years was in public accounting  
9 and then four years in investment banking.

10 Q. So what types of things did you do in your six years in  
11 public accounting?

12 A. Yeah. I did financial due diligence, primarily. That  
13 would be where I would look at companies' books and records  
14 to better understand companies and, you know, making sure  
15 that numbers really add up to what is being stated.

16 Q. And four years in investment banking?

17 A. Correct.

18 Q. What types of places did you work at?

19 A. Yeah. So I helped buy and sell middle market companies.  
20 So helping diligence those companies and then actually  
21 market them. So understanding all the operations of a  
22 company, what makes a company tick, and then finding a buyer  
23 and/or seller.

24 Q. What's a middle market company?

25 A. Yeah. A middle market company would be a company with a

1 value of about \$100 million up to about \$1 billion.

2 Q. Okay. Let's talk a little bit about your education and  
3 background. Did you go to college?

4 A. I did, yes.

5 Q. Where did you go?

6 A. I went for my undergrad at the University of North  
7 Dakota, which is located in Grand Forks. I got a bachelor's  
8 degree in accounting. And then I also pursued upper level  
9 college classes at Northwestern University, and I finished  
10 with my master's of business administration.

11 And Northwestern is in Chicago, Illinois.

12 Q. All right. I want to direct your attention now to your  
13 role and why you are here today.

14 A. Sure.

15 Q. At some point did you become a part of the investigation  
16 that gives rise to why we are all here in this room now?

17 A. Yes. I joined the team approximately one year ago,  
18 February 2024.

19 Q. And generally what types of investigative tasks have you  
20 undertaken since you joined?

21 A. Yes. Since I've joined I have interviewed many  
22 witnesses. I've interviewed cooperating defendants. I've  
23 interviewed subjects. I participated in a search warrant.  
24 I've participated in arrest warrant.

25 And I've done a lot of roster analysis and

1 analysis of other documents used to submit claims for meals.

2 Q. Now one of the items you just mentioned was rosters; is  
3 that right?

4 A. Correct.

5 Q. Can you just briefly summarize for the jury in the  
6 context of your work on the case how have you observed  
7 rosters have appeared?

8 A. Yeah. I saw rosters appear in the fall of 2021. And  
9 rosters are long lists of children's names, and they are  
10 submitted by different meal sites to support meal claim  
11 reimbursements.

12 So picture a list of 2,000 names submitted, along  
13 with a claim packet.

14 Q. And that has been part of the types of paperwork that  
15 the jury has seen that have been submitted in support of a  
16 claim?

17 A. Yes.

18 Q. Particularly a claim for reimbursement?

19 A. That's correct.

20 Q. As part of the federal child food program?

21 A. Yes.

22 Q. And how is it that they, these rosters you are  
23 describing have appeared in the evidence you have reviewed?

24 A. Yeah. I found the rosters in emails between the  
25 defendants, other codefendants, between other people that we

1 don't necessarily know, and then we've also found the  
2 rosters at Feeding Our Future in the physical files.

3 We found the rosters in text messages. We have  
4 found the rosters in the physical files at the Safari  
5 location on Park Avenue. The rosters have been found over  
6 many sources during the investigation.

7 Q. Let's talk about some of these roster and enrollment  
8 records that you have reviewed.

9 First, as part of the investigation, did you and  
10 others acquire student enrollment records from some  
11 Minnesota Public School Districts?

12 A. That's correct, we did.

13 Q. And why did you do that?

14 A. We wanted to compare the rosters against actual children  
15 names from, you know, children enrolled at school districts.

16 Q. And have you reviewed those student enrollment records?

17 A. I have, yes.

18 Q. Are you familiar with them generally?

19 A. Yes, I am.

20 Q. And prior to today in fact, have you reviewed contents  
21 of those enrollment records on a thumb drive that is marked  
22 as Exhibit LL1?

23 A. Yes, I have.

24 Q. Can you more specifically describe for the jury the  
25 types of information that are on this Exhibit LL1?

1 A. Yeah. On Exhibit LL1 are 20 long lists of children's  
2 names actually enrolled in public schools. There are 20  
3 school districts that we reached out to and got their actual  
4 enrollment records.

5 And the time frame was 2020 and 2021 of those  
6 records.

7 Q. And does 1LL1 contain true and accurate enrollment  
8 records as provided to investigators by some Minnesota  
9 Public School Districts?

10 A. Yes.

11 MR. EBERT: Your Honor, at this time the  
12 government moves to admit Exhibit LL1.

13 THE COURT: Any objection?

14 MR. COLICH: No objection.

15 MR. UDOIBOK: No objection.

16 THE COURT: LL1 is admitted.

17 MR. EBERT: Thank you.

18 BY MR. EBERT:

19 Q. Next, Special Agent Parks, have you created a chart that  
20 summarizes the information that you obtained that contain  
21 those real student enrollment records?

22 A. Yes, I did.

23 Q. All right. I'm going to show you on your screen what's  
24 been marked, but not admitted, as Exhibit LL2.

25 Just taking a look at that, do you recognize it?

1 A. Yes, that is a chart that I created.

2 Q. And does this chart fairly and accurately summarize the  
3 school record data that's on that thumb drive?

4 A. Yes, it does.

5 Q. Would it be helpful to the jury in understanding that  
6 evidence?

7 A. Yes, it would.

8 MR. EBERT: Your Honor, at this time the  
9 government offers Exhibit LL2.

10 MR. UDOIBOK: No objection.

11 MR. COLICH: No objection.

12 THE COURT: LL2 is admitted.

13 MR. EBERT: Thank you.

14 BY MR. EBERT:

15 Q. Okay. So we're going to kind of go through this  
16 step-by-step so the jury can see.

17 So first, what's the title of this chart you  
18 created?

19 A. Summary Schedule of School District Student Enrollment.

20 Q. And at the very bottom I'm going to enlarge that green  
21 row. What are we looking at?

22 A. We are looking at the total number of students enrolled  
23 in the selected 20 districts that we obtained data from.

24 Q. And what is the total number of students enrolled?

25 A. 193,249.

1 Q. And there are a list of 20 school districts cited here;  
2 is that right?

3 A. Yes.

4 Q. Is there a rhyme or reason to the way in which they are  
5 ordered?

6 A. They are ordered from largest to smallest. So  
7 Minneapolis was the largest school district that we received  
8 data from, and Medford was the smallest.

9 Q. Okay. And so obviously there are far more than 20  
10 school districts in the --

11 A. Correct.

12 Q. -- State of Minnesota?

13 A. That's correct.

14 Q. Why are these 20 part of what the investigation  
15 gathered?

16 A. These 20 school districts were located in places where  
17 meal sites by -- or supported by Feeding Our Future were  
18 also located.

19 Q. And in the next category, what are we looking at here  
20 for enrollment time period?

21 A. Yes. So each school district keeps track of the records  
22 slightly different. We ask for a consistent point of the  
23 data. Unfortunately, we didn't get exactly consistent data,  
24 but this defines, you know, the time period in which the  
25 schools gave us the data.

1 Q. Generally throughout the time period of the pandemic?

2 A. Correct. 2020 and 2021.

3 Q. And what is this third category?

4 A. Again, the school districts gave different sets of data.

5 Some school districts kept K through 12, whereas others had

6 early child learning and went all the way down to infants,

7 all the way up to, as you can see, age 21 in St. Paul.

8 Q. But generally speaking is a fair summary that a common

9 denominator is that these are minors?

10 A. Yes.

11 Q. Students generally under the age of 18; is that fair?

12 A. Generally, yes.

13 Q. And then lastly over here on the right, what do we see?

14 A. That is the number of students enrolled in the

15 respective school districts.

16 Q. The largest at the top being just over 33,000?

17 A. Yes.

18 Q. And just below it, which district is about 32,000?

19 A. St. Paul Public.

20 Q. And these continue on below it; is that right?

21 A. Yes.

22 Q. Rochester at just over 20,000 students?

23 A. Correct.

24 Q. So we see urban districts?

25 A. Yes, we do.

1 Q. As well as a mixture of districts located in different  
2 parts of the state; is that right?

3 A. That is correct.

4 Q. Some suburban, some in different parts of Minnesota?

5 A. Yes.

6 Q. All right. So we'll return back to those enrollment  
7 records in a bit, but now I want to direct your attention to  
8 some of these rosters in the case.

9 Okay?

10 A. Okay.

11 MR. EBERT: Can I have one moment, Your Honor?

12 THE COURT: You may.

13 MR. EBERT: All right. Thank you, Your Honor.

14 BY MR. EBERT:

15 Q. And by way of example, I'm showing you what is in  
16 evidence as Exhibit B32. And this is yet another email  
17 message of the type the jury has seen. What is the date of  
18 this one?

19 A. November 2nd, 2021.

20 Q. Who is it from and who is it to?

21 A. The email is sent from safarirestaurantmn@gmail.com, and  
22 it was sent to claims@feedingourfuturemn.org.

23 Q. And with a subject line of After School Claims,  
24 October 2021, for Safari; is that right?

25 A. That's correct.

1 Q. And there are a series of attachments listed. What are  
2 those?

3 A. Yeah. There are three attachments. Safari Invoice  
4 October 2021, October 2021, and Safari Attendance.

5 Q. And so when we speak of Safari, is this Safari  
6 Restaurant? Is it Safari Restaurant in Minneapolis?

7 A. Yes.

8 Q. And on the screen is one of the bank accounts for Safari  
9 Restaurant. Did that sometimes go by the name Cosmopolitan  
10 Business Solutions?

11 A. Correct.

12 Q. And W4 is the account signature for one of those bank  
13 accounts. And remind the jury, at least on this item, who  
14 are listed as the account owners for Safari Restaurant?

15 A. Yeah. There are two individuals listed, Abdulkadir Nur  
16 Salah and Salim Said.

17 Q. So returning back to Exhibit B32, this was the email  
18 message we were just looking at one moment ago; is that  
19 right?

20 A. That's correct.

21 Q. And you testified that there was a series of documents  
22 attached.

23 A. Yes.

24 Q. Including these meal count forms?

25 A. Yes.

1 Q. Also including things like this?

2 A. Yes. This is an invoice to Feeding Our Future.

3 Q. And how much is being billed by Safari Restaurant to the  
4 federal child program on this invoice?

5 A. Approximately \$429,000.

6 Q. Based on purported meal servings, costing upwards of  
7 13,000 or \$14,000 every single day in the month of  
8 October 2021?

9 A. Yes.

10 Q. And then do you see where it says QTY?

11 A. Yes.

12 Q. What does that mean?

13 A. That would stand for quantity, and quantity here would  
14 represent the number of snacks and the number of suppers  
15 served.

16 Q. So over 2,600 served allegedly every single day by  
17 Safari Restaurant?

18 A. Yes.

19 Q. Now in addition to the meal counts in this invoice, was  
20 there also submitted to Feeding Our Future a longer document  
21 like this one?

22 A. Yes. This is an example of a roster.

23 Q. Back at the top, what do we see?

24 A. We see the title Cosmopolitan Business Solutions LLC.

25 We see that this is the attendance for an after-school

1 program for the month of October 2021.

2 Q. And as you continue on through this document, this goes  
3 on for page after page; is that right?

4 A. That is correct.

5 Q. And at a certain point, do you start to see check marks  
6 listed virtually every single day for every single purported  
7 child?

8 A. Correct.

9 Q. Did you attach any significance to seeing that in this  
10 and any other rosters like that?

11 A. Yeah. That appears to be the attendance of that student  
12 or child in this after-school program at Cosmopolitan  
13 Business Solutions, also known as Safari Restaurant.

14 And you will see that there are many check marks.  
15 I found that unusual because you wouldn't expect all of  
16 these children to be in attendance every day.

17 Q. Yet, what do you see throughout this roster?

18 A. Day after day, these children are in attendance and  
19 getting meals.

20 Q. At least according to this document?

21 A. Correct.

22 Q. Now there are other examples of rosters you've looked  
23 at; is that right?

24 A. Yes, many.

25 Q. I'm showing you what's been marked, but not admitted, as

1 Exhibit P22. Is this a copy of an email message provided to  
2 investigators in response to a search warrant from Google?

3 A. Yes, it is.

4 Q. A true and accurate copy of such records?

5 A. Yes.

6 MR. EBERT: Your Honor, at this time the  
7 government offers P22.

8 THE COURT: Any objection?

9 MR. UDOIBOK: No objection.

10 MR. MONTEZ: No objection.

11 THE COURT: P22 is admitted.

12 BY MR. EBERT:

13 Q. So this appears to be a forwarded email.

14 A. Yes.

15 Q. Fair to say? So let's look at the bottom. What's the  
16 date of the message at the bottom?

17 A. The date is November 6th, 2021.

18 Q. And it's September by Farhiyo Moalim with a TSF at gmail  
19 address; is that right?

20 A. That's correct.

21 Q. And to whom was she sending a message an November 6th of  
22 that year?

23 A. Salim Said.

24 Q. Salimsaid4040@gmail.com?

25 A. That's correct.

1 Q. Is that known to the investigators to be the account  
2 used by Salim Said?

3 A. It is.

4 Q. And there's a subject. What is it?

5 A. Southcross October Attendace, which I believe is a  
6 spelling error.

7 Q. Attendance?

8 A. Yes.

9 Q. And based on your work in the investigation, are you  
10 familiar with that word and that term "Southcross"?

11 A. Yes.

12 Q. How so?

13 A. Southcross is a purported meal distribution site located  
14 in Burnsville, Minnesota, in a small strip mall.

15 Q. And we'll talk about these at length, but just by way of  
16 example, do we see here yet another email attaching rosters  
17 of purported children?

18 A. Yes.

19 Q. Listing their supposed ages?

20 A. Yes.

21 Q. And that email we just looked at was forwarded; is that  
22 right?

23 A. It was.

24 Q. This was received by Salim Said. And then what did he  
25 do with it?

1 A. Salim Said received the email and then sent it along to  
2 Abdulkadir Salah.

3 Q. Sometimes known as Fish; is that right?

4 A. Yes.

5 Q. And that was his -- one of the coowners of a Safari  
6 Restaurant; is that correct?

7 A. That is correct.

8 Q. Are you also familiar, because of the investigation,  
9 with an entity called ASA Limited?

10 A. Yes.

11 Q. What is ASA Limited?

12 A. ASA Limited is a purported meal site located in St. Paul  
13 along McKnight Road, and it's also a legal entity owned by  
14 three people, one of those being Salim Said.

15 Q. Up on the left is Exhibit C60a. Is that a photo?

16 A. Yes, it is.

17 Q. And how does that relate to ASA that you are testifying  
18 about?

19 A. This is a photo of the address listed for ASA Limited  
20 where the purported meal distribution occurred.

21 Q. And now I'm showing you page 16 of Exhibit C3 on the  
22 right. And is this describing the ownership of this entity  
23 ASA Limited?

24 A. Yes.

25 Q. And it lists 33 and a third ownership amongst three

1 individuals; is that right?

2 A. That is correct.

3 Q. And who are those individuals?

4 A. Abdihakim Ahmed, Salim Said, and Ahmed Ghedi.

5 Q. In other words, ASA?

6 A. Yes.

7 Q. Now is it your testimony that ASA purported to feed  
8 children from this location under the words "Smokes?"

9 A. Yes.

10 Q. And have you seen in the investigation rosters of  
11 supposed children who ate at that location under the yellow  
12 words "Smokes" on McKnight Road?

13 A. Yes, I have seen rosters claiming to have served meals  
14 to children at that location.

15 Q. For example, on the screen is Exhibit C26. Is this yet  
16 another email message?

17 A. It is.

18 Q. And can you describe who sent it?

19 A. The email was sent by Abdihakim Ahmed.

20 Q. Defendant in this case?

21 A. Yes.

22 Q. And who did he send a message to?

23 A. He sent a message to three email accounts. One of those  
24 is claims@feedingourfuturemn.org. Another is to  
25 hani@feedingourfuturemn.org, and then lastly

1 aimee@feedingourfuturemn.org, which I understand is accessed  
2 by Aimee Bock.

3 Q. And there's a subject to this message sent to Aimee Bock  
4 and others; is that right?

5 A. Yes.

6 Q. What is that subject?

7 A. ASA September Meal Count.

8 Q. This was sent on which date?

9 A. October 8th, 2021.

10 Q. And once again, there's a series of attachments,  
11 correct?

12 A. Yes, there are two attachments.

13 Q. And does one of them indicate it's an attendance list of  
14 some sort?

15 A. Correct, ASA September attendance.

16 Q. Which thereafter continues on for several pages; is that  
17 right?

18 A. Correct.

19 Q. And we'll talk about this and others in a moment, but  
20 just generally, are these the examples of the types of  
21 records that you've reviewed in the investigation with  
22 respect to the usage of rosters?

23 A. Yes.

24 Q. How many rosters do you think you have looked at in the  
25 course of working on the investigation?

1 A. Hundreds.

2 Q. And have you created some charts that summarize the  
3 information that you've looked at across the evidence?

4 A. Yes.

5 Q. Next I'm showing you what's been marked, but not  
6 admitted, as Government Exhibit LL3. Do you recognize that?

7 A. Yes, I created this.

8 Q. And did you create that chart by combining some of the  
9 information contained in the public school records in LL1?

10 A. Yes.

11 Q. And what else did you look at?

12 A. Yes. I looked at 20 email messages that contained  
13 attached rosters, and then I compared the roster attachments  
14 to the actual enrollment records obtained by the schools.

15 Q. And does that chart fairly and accurately summarize the  
16 information contained in those various rosters, as well as  
17 in the school district enrollment records?

18 A. Yes.

19 MR. EBERT: Your Honor, at this time the  
20 government offers Exhibit LL3.

21 MR. UDOIBOK: No objection.

22 MR. MONTEZ: No objection.

23 THE COURT: LL3 is admitted.

24 MR. EBERT: Thank you.

25

1 BY MR. EBERT:

2 Q. So let's take a moment and explain to the jury what you  
3 have compiled in this summary.

4 A. Sure. It would make sense to go column by column.

5 Q. Okay.

6 A. The first column is the site. So there are many sites  
7 in this case. To make it easy, we put a column specifically  
8 referencing the site that the meal rosters were for.

9 Q. Okay.

10 A. So you can see Safari, ASA, Olive Management and  
11 Stigma-Free, Willmar, these are all purported food  
12 distribution sites.

13 Q. And the last one you mentioned was Willmar. There are  
14 additional sites you've also compiled here; is that right?

15 A. Yes.

16 Q. Including a Stigma-Free in Mankato. And where else?

17 A. Stigma-Free, Waite Park; Stigma-Free, St. Cloud;  
18 Stigma-Free, St. Paul; Brava Restaurant; Bet On Better  
19 Future, Gaur; and Southcross.

20 Q. And all of these that are compiled in this summary LL3,  
21 these were all sites that were enrolled in what?

22 A. They were enrolled in the federal nutrition program.

23 Q. And did they have a sponsor?

24 A. They did. The sponsor was Feeding Our Future.

25 Q. All right. And now let's take a look at the next column

1 over so the jury has an understanding of this summary.

2 A. Yes. This column references the actual exhibit that can  
3 be used to look up this data. As you can see on the bottom  
4 right-hand corner, you will see Government Exhibit LL3 with  
5 its sticker.

6 This column represents and references out to that  
7 actual evidence.

8 Q. And some of these perhaps we've already looked at today  
9 or we will; is that right?

10 A. Yes.

11 Q. And generally these exhibits, B28, B32, C26, as  
12 examples, these are email messages; is that right?

13 A. Yes.

14 Q. And so enlarging some of the next few columns, what do  
15 we see here?

16 A. So here we show the sender or the "from" column and the  
17 receiver, the "to" column, of the email message.

18 Q. And in certain instances, is the recipient a defendant  
19 in this courtroom in this trial?

20 A. Yes. Aimee Bock and Salim Said both received at least  
21 some of these emails.

22 Q. And in other instances, did a defendant in this trial  
23 send some of these messages with these rosters?

24 A. That's correct.

25 Q. Multiple sent; is that right?

1 A. Yes.

2 Q. Okay. Moving on. What is the next column to the right?

3 A. This column references the actual attachment to the  
4 email message, and that's the attachment used to, selected  
5 for comparison purposes.

6 Q. Okay. Now, the names of these attachments, did you pick  
7 those names?

8 A. No. That is the actual reference to the attachment in  
9 the emails.

10 Q. Okay. And then just after that column describing the  
11 attachment is one that reads Number Roster Names; is that  
12 right?

13 A. Yes, this is the number of names included in those  
14 attachments on the emails, the names being children's names  
15 purportedly.

16 Q. Purported children names. So the first one had the  
17 names of supposedly 1,547 children; is that correct?

18 A. Yes.

19 Q. And then the next several, as we see here enlarged, all  
20 profess to have the names of more than 2,000 children  
21 attached to the email message as the roster?

22 A. Yes.

23 Q. All right. So what then did you do with these lists of  
24 purported children?

25 A. I took those names on each of these attachments, and I

1 compared and looked at those names to see are those children  
2 actually enrolled in the most relevant school district.

3 So, for example, the first one, there were 1500  
4 names approximately. I took those names, and I said are  
5 these actually children enrolled in Minneapolis.

6 Q. And what's the purpose of doing that? Why?

7 A. I'm doing that to see is there validity in the rosters  
8 that were attached, right? If these are actual rosters of  
9 real children, you would expect them to be enrolled in  
10 public schools.

11 Q. And generally, what was the case when you compared the  
12 names on these various rosters with the actual Minnesota  
13 public school enrollment records?

14 A. I found very low percentages of rosters that actually  
15 represented real kids.

16 Q. So, for example, taking a look at ASA, and there's been  
17 a lot of names mentioned. So just as a reminder, ASA was a  
18 food site that purported to feed children where?

19 A. In St. Paul.

20 Q. And so if we enlarge two examples of messages, one  
21 received by Aimee Bock, another received by Salim Said; is  
22 that correct?

23 A. Yes.

24 Q. One with September attendance, the other with ASA  
25 October attendance; is that correct?

1 A. That's correct.

2 Q. And how many children's names were attached on each of  
3 those rosters sent, one, to Aimee Bock, the other to Salim  
4 Said?

5 A. Both 2,043 names.

6 Q. And so can you describe, what did you do with taking a  
7 look at those 2,043 names?

8 A. Well, the first step I took, I actually compared the  
9 September names to the October names. They're the same  
10 names.

11 Q. Just to stop you right there.

12 A. Yes.

13 Q. What significance, if any, that it's the same names on  
14 the same lists month after month?

15 A. I found it very surprising that you would have 2,000  
16 children in September show up in the exact same order and  
17 the same attendance in October.

18 Q. Surprising why?

19 A. People get sick. This is a pandemic, right? At this  
20 point school is back in session. There are holidays  
21 occurring. Attendance isn't consistent, right, for  
22 students.

23 And many of these names, there's actually an age  
24 column. And many of them are 17 years old. I know when I  
25 was 17 I probably wasn't getting free food every single day

1 month after month.

2 Q. At the smoke shop on McKnight Road?

3 A. Right.

4 Q. So moving on here, you said that there were 2,043 names  
5 identically on both lists; is that right?

6 A. That's correct, yes.

7 Q. And you were starting to describe what you did to look  
8 at those names. And what is that?

9 A. Yes. I took those names, and I compared to see are  
10 those names of children enrolled in the St. Paul School  
11 District.

12 Q. And what did you find out?

13 A. I found only 65 names are names of real children  
14 enrolled in school districts -- or in the school district.

15 Q. So what percentage is that, do you know?

16 A. I think it's around 3 percent.

17 Q. So only about 3 percent of the names matched?

18 A. Yes.

19 Q. Was that a concern or a red flag for the investigation?

20 A. It's an immediate red flag. Where are these children  
21 coming from? Like, who are these children? Where do these  
22 names come from?

23 Q. So just below the one that we looked at is another  
24 example. And can you describe this next example for the  
25 jury?

1 A. Yes. This was an email message sent by  
2 tfsauditors@gmail.com, and the email was sent on  
3 November 3rd, 2021, and the email was sent to Salim Said and  
4 also to Feeding Our Future.

5 Q. And it says Olive Management; is that right?

6 A. Yes.

7 Q. And is Olive Management another entity that's involved  
8 in the food program?

9 A. Yes. They had a purported meal site I believe in  
10 St. Cloud, Minnesota.

11 Q. In fact as a reminder for the jury, do we see that  
12 purported St. Cloud food site depicted here in Exhibit E33?

13 A. Yes.

14 Q. Now going back to your summary chart LL3, that summary  
15 references an email involving Olive Management, correct?

16 A. Yes.

17 Q. And it's marked for the jury as Exhibit E25?

18 A. Yes.

19 Q. And we'll take a look at it in a moment, but did that  
20 also have one of these attendance rosters when it was sent  
21 in?

22 A. Yes. It had an attendance roster for Olive Management's  
23 October 2021 attendance.

24 Q. And the recipients of that were which parties?

25 A. Salim Said and Feeding Our Future.

1 Q. And how many names of supposed kids were on the Olive  
2 Management roster sent to Feeding Our Future and Salim Said  
3 on November 3rd, 2021?

4 A. There was 2,128 names.

5 Q. Did you follow the same procedure you just described a  
6 moment ago?

7 A. Yes, I did.

8 Q. Tell us what you did.

9 A. I compared the names in the attachment, and I looked at  
10 the school district data for St. Cloud, which is a  
11 relatively large school district with 10,000 kids. And I  
12 found a very small percentage of the names and the roster  
13 were actually enrolled in the St. Cloud School District.

14 Q. Now, you offered similar testimony a minute ago about  
15 the results of your comparison for which city?

16 A. For St. Paul.

17 Q. And now we're talking about St. Cloud; is that right?

18 A. Yes.

19 Q. For folks who don't know, roughly where is St. Cloud?

20 A. It's about an hour, hour and a half away north of here.

21 Q. Did it give you pause that yet again you are seeing  
22 another district where there's virtually no overlap between  
23 these enrollment records of supposed kids and the actual  
24 school district records?

25 A. Yes. And I actually looked at the size of the

1 geographic region covered by the St. Cloud School District.  
2 I thought maybe this is a very small district, but in fact  
3 it's not. It covers a large area.

4 So I feel comfortable that you are capturing the  
5 area around St. Cloud.

6 Q. Do you feel comfortable about the names on that roster  
7 attached to Feeding Our Future and Salim Said?

8 A. No, I do not.

9 Q. Why not?

10 A. I would absolutely expect these names to be names of  
11 kids in the local district. Public, public school kids  
12 would be the students most likely to need the free meals  
13 being offered at this time.

14 I wouldn't expect it to be the private school  
15 kids. I wouldn't expect it to necessarily be, I don't know,  
16 home-schooled kids. It's probably going to be the public  
17 school kids that need the meals, and those children are not  
18 actually enrolled in the local district.

19 MR. EBERT: Your Honor, would this be an ideal  
20 time to pause?

21 THE COURT: Is that why you were breaking?

22 MR. EBERT: Yes, Your Honor.

23 THE COURT: I thought you just lost your train of  
24 thought.

25 All right. This is fine.

1 We'll come back at 3:25.

2 All rise for the jury.

3 3:02 p.m.

4 **IN OPEN COURT**

5 **(JURY NOT PRESENT)**

6 THE COURT: All right. Everyone, we will recess  
7 until 3:25.

8 (Recess taken 3:02 p.m. till 3:31 p.m.)

9 3:31 p.m.

10 **IN OPEN COURT**

11 **(JURY PRESENT)**

12 THE COURT: You may all be seated.

13 You may continue.

14 MR. EBERT: All right. Thank you, Your Honor.

15 BY MR. EBERT:

16 Q. All right. Special Agent Parks, before the break I was  
17 asking you questions about one of the email messages that is  
18 summarized on your chart, and I believe it was email E25.

19 And that had to do with Olive Management; is that  
20 right?

21 A. That's correct, yes.

22 Q. And that was the, the image we just looked at a moment  
23 ago in E33, the supposed food site in St. Cloud?

24 A. Yes.

25 Q. So now taking a look at that email, is this the one you

1 testified about a moment ago that was sent to Salim Said at  
2 his gmail account?

3 A. Yes.

4 Q. With all these various attachments?

5 A. Yes.

6 Q. And this was sent by TFS Auditors. Do you see that?

7 A. I do.

8 Q. Remind the jury what that is.

9 A. Tfsauditors@gmail.com is the sender of this, and I  
10 believe it's a codefendant.

11 Q. And then among the attachments are yet again meal  
12 counts. Do we see that?

13 A. Yes.

14 Q. Page after page professing that upwards of 2,000  
15 children were fed each day; is that right?

16 A. That's right.

17 Q. As well as an invoice for Hormud Meat and Grocery in  
18 St. Cloud, Minnesota?

19 A. Yes.

20 Q. And each one of these is billing the federal child  
21 program; is that right?

22 A. That's correct.

23 Q. One for \$29,000. Another one for 31,000; is that right?

24 A. Yes.

25 Q. And then we get to the rosters of names; is that right?

1 A. Yes.

2 Q. And is this of the type in which you observed any type  
3 of correlation with the local district?

4 A. This would be one of the rosters that I took and  
5 compared against the St. Cloud School District enrollment  
6 data and found very little matching names.

7 Q. And that message we just looked at on the screen, is  
8 that one that was obtained through a search warrant served  
9 upon Google?

10 A. Yes.

11 Q. And is that a true and accurate copy of the record  
12 produced by Google?

13 A. Yes.

14 MR. EBERT: And, Your Honor, that item I would now  
15 offer into evidence, which I understood to have been in  
16 evidence when we looked at it a moment ago, but I would  
17 offer that now, and it's E25, Your Honor.

18 THE COURT: Any objection to E25?

19 MR. UDOIBOK: No objection.

20 MR. MONTEZ: No objection.

21 THE COURT: E25 is admitted.

22 MR. EBERT: Thank you.

23 BY MR. EBERT:

24 Q. Is Willmar, Minnesota, another area in the state for  
25 which you have looked at enrollment records?

1 A. Yes.

2 Q. And I'm showing you what has been marked as Exhibit G28,  
3 which I believe is in evidence. Can you describe what that  
4 is, Special Agent Parks?

5 A. Yes. This is an email message sent from Abdikadir  
6 Mohamud to Salim Said, with a subject Stigma-Free, Willmar  
7 September Meal Documents. This email was sent on  
8 November 3rd, 2021, and contained multiple attachments.

9 Q. One of which is one that has the title or the words  
10 Attendance in it; is that right?

11 A. Yes.

12 Q. Now, the sender, Abdikadir Mohamud, is he another  
13 defendant charged in this case?

14 A. Yes.

15 Q. And the Willmar location, the jury will recall testimony  
16 about this. Can you describe what's on the screen in  
17 Exhibit G39?

18 A. Yes. These are pictures of the purported meal  
19 distribution site in Willmar at the FaaFan Restaurant.

20 Q. And that email message G28, did that have a roster  
21 attached to it?

22 A. It did.

23 Q. And how many children's names, supposed children's  
24 names, were listed on that?

25 A. 1,991 names.

1 Q. And that email message sent on November 3rd, 2021, to  
2 Salim Said, did you see much, if any, correlation between  
3 the list of those names and the Willmar Public School  
4 records?

5 A. No. I found very little correlation. The other  
6 observation that I had when looking at the Willmar records,  
7 if you notice, like about 2,000 names are in that, and the  
8 Willmar School District only had 4,600 names or so.

9 That's a large number of children getting meals in  
10 such a small community, purportedly.

11 Q. And going back to that email that attached was almost  
12 2,000 names, do we also see that there was an invoice  
13 included with it?

14 A. Yes.

15 Q. And is Stigma-Free, Willmar billing the Federal Child  
16 Nutrition Program for over \$10,000 a day for supposed meals  
17 served to children?

18 A. Yes.

19 Q. In fact, almost 2,000 supposed meals served out of the  
20 FaaFan Restaurant we just looked at a moment ago?

21 A. Yes.

22 Q. In total for that month alone, according to this  
23 invoice, how much was Stigma-Free, Willmar billing when they  
24 emailed this to Salim Said?

25 A. \$246,798.

1 Q. Moving back to your summary of these various districts,  
2 I want to direct your attention to an item that I do not  
3 believe is in evidence, and it's marked as K3.

4 Is that a copy of an email message received in  
5 response to a Google search warrant?

6 A. Yes.

7 Q. True and accurate copy?

8 A. Yes.

9 MR. EBERT: At this time the government offers  
10 Exhibit K3, if it is not in evidence, Your Honor.

11 MR. UDOIBOK: No objection.

12 MR. MONTEZ: No objection.

13 THE COURT: K3 is admitted. It's not in evidence.

14 MR. EBERT: Thank you, Your Honor.

15 BY MR. EBERT:

16 Q. What are we looking at in this one, Special Agent Parks?

17 A. Yes. This is an email message sent from Abdihakim Ahmed  
18 to Salim Said, and the subject of that email is  
19 ASA/Stigma-Free, St. Paul.

20 Q. So that same Stigma-Free name we've now heard several  
21 times; is that right?

22 A. Yes.

23 Q. Except this time it's not in a place like Willmar or  
24 elsewhere. It's where?

25 A. St. Paul.

1 Q. And looking back at the "from" line, Abdihakim Ahmed?

2 A. Yes.

3 Q. Another defendant in this case?

4 A. Yes.

5 Q. Is he one of the individuals you just testified about in  
6 those ASA corporate records?

7 A. It is, yes.

8 Q. And he's sending this message to whom?

9 A. Salim Said.

10 Q. And looking back at your summary chart at LL3, and I'll  
11 highlight this so it's a little easier to see. For this  
12 Stigma-Free, St. Paul party or this place, how many names  
13 were attached to that roster sent to Salim Said?

14 A. 3,744 names.

15 Q. And is it your understanding that Stigma-Free, St. Paul  
16 is another site in the food program?

17 A. That's my understanding, yes.

18 Q. All under the sponsorship of which sponsor?

19 A. Feeding Our Future.

20 Q. Did you reference those supposed children names with the  
21 St. Paul Public School records?

22 A. Yes. I made a similar comparison as has been done  
23 before.

24 Q. And can you describe for the jury the outcome of that  
25 comparison?

1 A. It was a very low number of roster names that were  
2 actually enrolled in the St. Paul Public School District.

3 Q. All right. Next I want to direct your attention to  
4 Exhibit Z12. Z12, is this an email message dated  
5 November 4th, 2021?

6 A. Yes.

7 THE COURT: Z12 is in. Did you already know that?

8 MR. EBERT: This is in evidence Your Honor.

9 THE COURT: It is already in evidence.

10 MR. EBERT: Thank you.

11 BY MR. EBERT:

12 Q. And Z12, does that correspond to a wire fraud count in  
13 the indictment?

14 A. Yes. It's a charged Count 12.

15 Q. Wire fraud. So it's Count 12 of the indictment. And  
16 that's against Aimee Bock?

17 A. Yes.

18 Q. As well as Salim Said?

19 A. Yes.

20 Q. And can you describe what this email message is?

21 A. This email message is from Abdihakim Ahmed to Feeding  
22 Our Future, to Aimee Bock, and to another individual at  
23 Feeding Our Future.

24 And the contents of this email are invoices, meal  
25 counts, and attendance rosters.

1 Q. Did you do a similar analysis of information contained  
2 in the attached roster?

3 A. Yes.

4 Q. And did you create yet another summary chart of that?

5 A. I did, yes.

6 Q. Did you kind of follow the same types of steps that  
7 you've already testified about previously?

8 A. Yes. Same methodology.

9 Q. I'm showing you what's been marked, but not admitted, as  
10 Exhibit LL4. Do you recognize that?

11 A. Yes. I created this.

12 Q. And does the underlying data in this summary, is it  
13 accurately and truly reflected?

14 A. Yes.

15 Q. Helpful to the jury in understanding that underlying  
16 evidence?

17 A. Yes.

18 MR. EBERT: Your Honor, at this time the  
19 government offers Exhibit LL4.

20 MR. UDOIBOK: No objection.

21 MR. MONTEZ: No objection.

22 THE COURT: LL4 is admitted.

23 BY MR. EBERT:

24 Q. All right. So I'm going to enlarge the top portion so  
25 that the folks can see it better. And I would ask you to

1 describe what you have compiled in the enlarged portion.

2 Okay?

3 A. Yes. So very similar to the summary that we've already  
4 talked through, the columns are essentially the same. The  
5 first column is the site, the site being here ASA.

6 There's a column for exhibits. There's a column  
7 for date. That is the date of an email message being  
8 transmitted.

9 There's a "from" field. So that is the sender of  
10 the email.

11 There is a "to" column. That's the receiver of  
12 the email. And then there's an attachment for comparison.  
13 And that attachment was the same ASA attendance October, and  
14 it had the same names.

15 Q. Same names?

16 A. Yes.

17 Q. Same supposed ages?

18 A. Yes, it's the same attachment.

19 Q. In the exact same order?

20 A. Yes.

21 Q. And so in the first instance, that roster of children,  
22 and both of these are associated with that site on McKnight  
23 Road in St. Paul; is that right?

24 A. Correct.

25 Q. This ASA site?

1 A. Yes.

2 Q. And in the first exhibit, C28, an email sent on  
3 November 2nd, 2021, that is sent to which person?

4 A. Sent to Salim Said.

5 Q. Attachment is titled ASA Attendance October; is that  
6 right?

7 A. Yes.

8 Q. And then what, how many names are on the list?

9 A. 2,043 names.

10 Q. And then approximately two days later, what happens?

11 A. Two days later that same attachment is sent from the  
12 same person to Aimee Bock and to the Feeding Our Future  
13 account called claims at Feeding Our Future, and then one  
14 other person at Feeding Our Future.

15 Q. And it's that occurrence two days later, November 4th,  
16 2021, that corresponds with Count 12 of the indictment; is  
17 that right?

18 A. Correct.

19 Q. And when you compared the 2,043 names with the St. Paul  
20 Public School enrollment at the time of 32,317 names, did  
21 you find substantial overlap or commonality between the two  
22 lists?

23 A. No. About 3 percent of the names on the roster actually  
24 matched a name of a student enrolled at the St. Paul Public  
25 School District.

1 Q. Real kids?

2 A. Not real kids.

3 Q. So let's take a peak back at one of those messages we're  
4 talking about right now. C28, this one, does it have an  
5 invoice attached?

6 A. Yes.

7 Q. And it's Stigma-Free, St. Paul with a University Avenue  
8 West address, billing the Federal Child Nutrition Program,  
9 according to this invoice?

10 A. Yes.

11 Q. How many supposed kids are they claiming to feed?

12 A. From 3,000 to about 3,600 or so.

13 Q. Billing daily amounts that ranges from about what to  
14 what?

15 A. About 15,000 to about 18,000.

16 Q. And in just that one month alone, October 2021, how much  
17 are they billing the Federal Child Nutrition Program?

18 A. A lot of money. Over a half a million dollars.

19 Q. Claiming that they served kids that are real?

20 A. Not real kids.

21 Q. So in addition to the type of review that you conducted,  
22 now I want to shift gears a little bit and talk about the  
23 ages, the ages that you see on some of these rosters.

24 Okay?

25 A. Okay.

1 Q. With respect to the ages, what, if anything, did you  
2 notice as you started to look across these rosters?

3 A. I noticed that ages changed month after month.

4 Q. Can you explain what you mean by that?

5 A. Yeah. If you take a single child on that roster, say in  
6 September or October, the child's age is different only a  
7 month or two later and not, you know, a person going from 15  
8 to 16 years old, but in fact a person going backwards in age  
9 or multiple years ahead.

10 And there are many instances of this kind of  
11 across the different rosters that I looked at.

12 Q. Did that matter to the investigation?

13 A. Absolutely. It was certainly a red flag that something,  
14 something is being created here that's not actually in  
15 reality, not based in reality.

16 Q. Or truth?

17 A. Or truth.

18 Q. So on the screen, Special Agent Parks, on the left is  
19 Exhibit Z12. Do you see that?

20 A. Yes.

21 Q. And Z12 is multi-page document with a lot in it; is that  
22 right?

23 A. Yes.

24 Q. Z12, just to be clear, this is that same one that  
25 corresponds with wire fraud Count 12?

1 A. Yes.

2 Q. Now on the right, do you see the exhibit number up  
3 there?

4 A. I do.

5 Q. Is that, is that Exhibit C47, a portion of the roster  
6 that was attached within or that was included within that  
7 exhibit?

8 A. Sorry. Can you repeat that question?

9 Q. C47, is that a portion of the roster that's included  
10 within that exhibit?

11 A. Yes.

12 Q. And specifically C47, is that a portion of records that  
13 were found at the Feeding Our Future office during the  
14 search warrant?

15 A. Yes.

16 Q. Okay. Now you mentioned your observations about  
17 children's ages changing; is that right?

18 A. Yes.

19 Q. With these two items on the screen, can you explain what  
20 you mean?

21 A. Yes. Take the first name on the list. On the left, you  
22 see Ali Hashim is a 17-year-old. And then on the right, Ali  
23 Hashim is now a 16-year-old.

24 And that is just one example. If you look at the  
25 other names, the other names also change ages except for

1 Hamza Hashim.

2 Q. All right. So, for example, line 1 in the roster on the  
3 left, which is ASA Limited for the month of October 2021; is  
4 that correct?

5 A. Yes.

6 Q. And on the right is ASA Limited in the December 2021  
7 folder found at Feeding Our Future; is that right?

8 A. Yes.

9 Q. So let's take a look at this time. Ali Hashim in  
10 October of that year is how old?

11 A. 17.

12 Q. And then two months later, what magically happens to  
13 Ali?

14 A. Lost a year, 16 years old now.

15 Q. Okay. So in line 4, do you see the name Aish, A-I-S-H,  
16 Hashim?

17 A. Yes.

18 Q. How old?

19 A. An 11-year-old.

20 Q. And then what happens two months later?

21 A. Aish is now 10 years old.

22 Q. What about the person with the last name of Korngot. Do  
23 you see that?

24 A. Yes.

25 Q. How old in October '21?

1 A. Korngot is nine years old.

2 Q. What happens two months later?

3 A. Korngot is now seven years old.

4 Q. And these go on and on; is that right?

5 A. About 2,000 names, yes.

6 Q. And what happens to those 2,000 names?

7 A. They're different month compared to month.

8 Q. The names stay the same, but the ages change?

9 A. Yes. The names stay the same, exactly the same, 2,043

10 names, but the ages fluctuate.

11 Q. Does that make sense?

12 A. Absolutely not.

13 Q. All right. I want to show you what is in evidence as

14 Exhibit C20. Now C20 is another email message; is that

15 right?

16 A. Yes.

17 Q. And what's the date of it?

18 A. October 7th, 2021.

19 Q. Okay. And it's sent by Abdihakim Ahmed; is that

20 correct?

21 A. Yes.

22 Q. One of Salim Said's fellow operators of ASA; is that

23 right?

24 A. Yes.

25 Q. And he writes a message. Do you see that?

1 A. Yes. He says, "Can you make all the kids ages 6-17?"

2 Q. And did you have an opportunity to look at the  
3 attachment to this message where he's asking whether you can  
4 make all the kids ages 6-17?

5 A. Yes, I reviewed the attachments, the attachment in this  
6 instance.

7 Q. And that attachment, is that the one that reads ASA  
8 Sept, Sept for September, kids count?

9 A. Yes.

10 Q. And at the end there's sort of a file extension. Do you  
11 see that?

12 A. Yes, I do.

13 Q. What is that?

14 A. That is the extension for a Microsoft Excel file.

15 Q. And now I'm showing you what has been marked, but not  
16 admitted, as Exhibit C22 or rather LL5.

17 MR. EBERT: Your Honor, could I have one moment,  
18 please?

19 THE COURT: Yes.

20 MR. EBERT: Thank you, Your Honor.

21 BY MR. EBERT:

22 Q. Okay. I'm showing you on the screen what's been marked,  
23 but not admitted, as Exhibit LL6. Do you recognize that?

24 A. I do, yes.

25 Q. Is it something that you created in your review of the

1 attachment?

2 A. Yes.

3 Q. Exhibit C20?

4 A. Yes.

5 Q. And is that a true and accurate screen capture of a  
6 portion of that attachment?

7 A. Yes, I took this screen capture.

8 MR. EBERT: Your Honor, at this time the  
9 government offers Exhibit LL6.

10 MR. UDOIBOK: No objection.

11 MR. MONTEZ: No objection.

12 THE COURT: LL6 is admitted.

13 BY MR. EBERT:

14 Q. All right. So, Special Agent Parks, we were just  
15 talking about that email which read in part, "Can you make  
16 all of the ages between 6 and 17," do you recall that?

17 A. Yes.

18 Q. And now what do we see on the screen?

19 A. Yes. This is a screenshot of one of those Microsoft  
20 Excel files that I spoke about just a minute ago. And here  
21 there's a column for the child's age, and within it is a  
22 formula that generates a random number between 7 and 17.

23 Q. And there's a box that, on my screen at least, appears  
24 to be a green one. Do you see that?

25 A. Yes.

1 Q. What is within that box?

2 A. In that box is the formula RAND between. And that is a  
3 built-in formula within Microsoft Excel that generates a  
4 random number based on your inputs, which is in parenthesis  
5 7, 17.

6 That portion is not built into the application,  
7 but would be typed in.

8 Q. Now when you say a random number, does it create a  
9 random number that's larger than 17?

10 A. No.

11 Q. Does it create a random number that's less than seven?

12 A. No.

13 Q. Can you explain why in the context of this case?

14 A. Yeah. This is a built-in formula within Excel that is  
15 very strict on what it can put out when the formula is ran.  
16 And it would set between 7 and 17, so it would not go  
17 outside those bounds.

18 Q. Because between 7 and 17, that's the age of a typical  
19 kid, right?

20 A. Yes.

21 Q. It wouldn't, it wouldn't work if you are listing someone  
22 who is, say, 81 or someone who is 45 years old, right?

23 A. Right. That would not be eligible for meal  
24 reimbursement.

25 Q. But someone who has the appearance of being an actual

1 kid, that would?

2 A. Yes.

3 Q. Potentially?

4 A. Yes.

5 Q. Now all the names on here, to be clear, are names that  
6 have what type of correlation compared to Minnesota school  
7 district records?

8 A. Yes. This is the same list of 2,043 names that I have  
9 already spoken about that have about that 3 percent overlap  
10 with the actual St. Paul Public School District records.

11 Q. Now, this image here, this is not, this isn't a live  
12 Excel document up on the screen, is it?

13 A. It is not. It is a screen capture to make it convenient  
14 for the court.

15 Q. But if this were the live document, have you had  
16 occasion to do something with respect to this age function  
17 that you are testifying about?

18 A. Yes. You can run the application, and every time you  
19 click the button run, it generates a new age. For each  
20 instance here, each name would generate a random age for  
21 each kid.

22 Q. For all?

23 A. Except for Hamza Hashim. You will notice here there's a  
24 13 that is hard-coded in.

25 Q. So it doesn't change?

1 A. It does not change.

2 Q. But with respect to the other 2,042 names on this list,  
3 how quickly does it automatically generate a brand-new age  
4 for each kid name?

5 A. Milliseconds. As soon as you hit the button, it  
6 generates a new age.

7 Q. Now this example on the screen in LL6, is this the only  
8 instance in which you saw rosters in this investigation that  
9 that had this age generator formula embedded in the Excel  
10 attachment?

11 A. No. I looked through Excel attachments at other sites  
12 as well, and I recall seeing the same formula at Willmar,  
13 Mankato, Waite Park, I believe Stigma-Free, St. Paul. So  
14 multiple, multiple rosters and multiple sites.

15 Q. Does that give any pause to you as part of the  
16 investigation to see it present across all of these rosters?

17 A. It certainly seems that whoever is putting this together  
18 is working to create ages for these kids, which these kids  
19 are, to be clear, not real kids.

20 These are the same fake names that don't match,  
21 you know, enrolled students, but now also applying an age  
22 for them. This is intentional, right? I mean, you would  
23 have to put this in.

24 Q. And so in other instances, did you observe names of  
25 other types of people within these various rosters seen in

1 the investigation?

2 A. Yes, I found real, real people in, for example, the ASA  
3 rosters.

4 Q. All right. I want to direct your attention to  
5 Exhibit C21. Can you describe what that is?

6 A. Yes. This is an email message sent to Abdihakim Ahmed.  
7 And there's an attached Excel document or, yeah, Excel  
8 document.

9 Q. And this is one of the gentlemen associated together  
10 with Salim Said for ASA Limited; is that right?

11 A. Yes.

12 Q. And there is an Excel -- in the original form, there was  
13 an Excel spreadsheet attached; is that right?

14 A. Yes.

15 Q. And as we scroll through, there are a series of names  
16 listed in blue lettering. Do you see that?

17 A. I do.

18 Q. And there's sort of an underline to them. Do you see  
19 it?

20 A. Yes.

21 Q. What's the significance, if any, that appears in that  
22 way with sort of the blue underline?

23 A. Yeah, in Microsoft Excel, this would indicate that  
24 there's a hyperlink or a connection to an outside website.

25 Q. And on the native document, did you click on some of

1 those links?

2 A. Yes.

3 Q. What happened?

4 A. It goes to an outside website of surnames.

5 Q. I'm showing you what's been marked as Exhibit LL5. This  
6 is not in evidence, but do you recognize this?

7 A. Yes. These are screen captures that I took.

8 Q. Of that website?

9 A. Yes, of the Excel document and then the corresponding  
10 website that it was linked to.

11 Q. Is it true and accurate copy of the images you took from  
12 that site?

13 A. Yes.

14 MR. EBERT: Your Honor, at this time the  
15 government offers Exhibit LL5.

16 MR. UDOIBOK: No objection.

17 MR. MONTEZ: No objection.

18 THE COURT: LL5 is admitted.

19 BY MR. EBERT:

20 Q. Now you are telling the jury about instances of seeing  
21 other names that are contained within these rosters; is that  
22 right?

23 A. Yes.

24 Q. So now that it's up on the screen for them, can you  
25 describe what this website is that's captured in

1 Exhibit LL5?

2 A. Yes. This website shows many common names from Somalia,  
3 and it also lists the frequency of those names. So the  
4 numbers behind correspond to the general frequency, from my  
5 understanding from the website.

6 And there are many names. And then if you click  
7 into a specific name, it gives you information about the  
8 origin and kind of the backstory about those surnames.

9 Q. I mean on page 3, does it literally say, "Discover the  
10 most common surnames among Somalis"?

11 A. Yes.

12 Q. And then there's a number after some of these names. Do  
13 you see that?

14 A. Yes.

15 Q. For example, names like Ali, correct?

16 A. Yes.

17 Q. Abdi?

18 A. Yes.

19 Q. Mohamed?

20 A. Yes.

21 Q. Each of those has a specific number, right?

22 A. Yes.

23 Q. And then embedded in that email attachment, does that  
24 same number with these common Somali names, is that the same  
25 number that you see?

1 A. It's the same number from the website, yes.

2 Q. What, if any, significance do you attach to seeing this  
3 within the evidence?

4 A. It appears somebody copied the names and dragged the  
5 names directly into Excel, and with it it took the links to  
6 the website.

7 Q. A way to create names?

8 A. Yes.

9 Q. Quickly?

10 A. Quickly, yes.

11 Q. Just like the age generator is a way to create names?

12 A. Yes.

13 Q. In a matter of what? Milliseconds?

14 A. Milliseconds. I tested this myself. I highlighted a  
15 lots of these names and dragged the names right into Excel,  
16 and it created a very similar document to what's been shown  
17 in evidence.

18 Q. I'm showing you what is in evidence as Exhibit C48. Do  
19 you recognize that?

20 A. Yes, I do.

21 Q. What is C48?

22 A. It's an email message sent to Abdihakim Ahmed with an  
23 attached Excel document.

24 Q. This is going to one of Salim Said's cooperators or  
25 coowners of ASA Limited?

1 A. Yes.

2 Q. Okay. Now this attachment contains some really small  
3 language on it. Fair to say?

4 A. Yes.

5 Q. And we'll enlarge some of that in a moment. But before  
6 we do that, can you describe for the jury what is contained  
7 in this multi-page attachment?

8 A. Yes. This attachment contains names, addresses, phone  
9 numbers, voter preferences, and contact information for many  
10 different people.

11 Q. Are these many different people children?

12 A. No.

13 Q. Who are they?

14 A. There's an age column here, and they appear to be  
15 adults.

16 Q. Adults, age 61, right?

17 A. Yes.

18 Q. Some are in their 70s?

19 A. Even older, yes.

20 Q. Even older than that, right?

21 And is there an address that is listed on this  
22 document for all these individuals?

23 A. Yes.

24 Q. What is that address?

25 A. The address changes depending on the person, but it

1 appears that these are real addresses.

2 Q. And is there a portion of them that are all located at  
3 the same address?

4 A. Yes.

5 Q. And is that 1247 St. Anthony Avenue?

6 A. Yes. It's a large apartment complex along I94 in  
7 St. Paul.

8 Q. Have you been there?

9 A. I have.

10 Q. Why did you go there?

11 A. I went there to try to meet and find some of these  
12 people on the list.

13 Q. And did you do that?

14 A. I did, yes.

15 Q. And did you show them -- first of all, why was it  
16 significant or necessary to go there and talk to them?

17 A. I found the same names in ASA rosters with ages of  
18 children. It's not the same age that I found in these.  
19 These are people sometimes in their 80s. And so I wanted to  
20 verify is this just a random list or is this a list of real  
21 people.

22 So I went out to the address listed and met with  
23 some of these people.

24 Q. You concluded that --

25 A. These are real people.

1 Q. And these real people show themselves in what way,  
2 according to the evidence you've seen?

3 A. They show up in the rosters as children under the age of  
4 18.

5 Q. Is that true?

6 A. No. These people are definitely not children. Many of  
7 them are quite elderly.

8 Q. I'm showing you what's been marked, but not admitted, as  
9 Exhibit LL8. Is this another summary chart that you  
10 created?

11 A. Yes.

12 Q. And is it a true and accurate copy of underlying data  
13 contained in rosters sent in emails?

14 A. Yes.

15 MR. EBERT: Your Honor, at this time the  
16 government offers Exhibit LL8.

17 THE COURT: Any objection?

18 MR. UDOIBOK: No objection.

19 MR. MONTEZ: No objection.

20 THE COURT: LL8 is admitted.

21 BY MR. EBERT:

22 Q. I'm going to enlarge this at the top and have you  
23 explain what's included in your summary. Okay?

24 A. Yes. I summarized three specific emails here. The top  
25 row is the exhibit reference to make it easy in court.

1                   Then there's the exhibit type. These were all  
2 emails.

3                   The emails were sent from the person in the gold  
4 box. And then there is a gray box which shows where the  
5 email was sent to.

6                   The claim period, that represents the month of  
7 purported meals served, September, October, November. You  
8 will see they are sequential here. And then the number of  
9 names, in each of these three instances the same number.

10 Q. And it's the same names, correct?

11 A. It's the same, same names, all 2,043 names.

12 Q. Month after month after month?

13 A. Month after month.

14 Q. Okay. Now on that note, I want to show you another  
15 summary that's been marked, but not exhibited into evidence,  
16 as LL9.

17                   Do you recognize that?

18 A. Yes, I created this.

19 Q. Okay. And does this summarize data contained from at  
20 least four different other exhibits in this trial?

21 A. Yes.

22 Q. And does it truly and accurately summarize that  
23 underlying data?

24 A. Yes.

25                   MR. EBERT: Your Honor, at this time the

1 government offers LL9.

2 MR. UDOIBOK: No objection.

3 MR. MONTEZ: No objection.

4 THE COURT: LL9 is admitted.

5 BY MR. EBERT:

6 Q. And is this another summary concerning rosters of  
7 supposed children who were fed at the ASA site on McKnight  
8 Road in St. Paul?

9 A. Yes.

10 Q. I've enlarged the top. Can you explain to the jury --  
11 first of all, can you explain to the jury what are the  
12 several dozen names that are contained in here?

13 A. These are the same names from that address that we just  
14 reviewed a moment ago, the same address that I went out to  
15 and I met with these elderly folks.

16 Q. Real people?

17 A. Real people.

18 Q. And their names are now used in what fashion?

19 A. To support meal claims in rosters.

20 Q. And so I'm not going to enlarge the names. Okay? But,  
21 instead, I'm going to enlarge everything to the right of it.  
22 Sound all right?

23 A. Okay.

24 Q. So walk us through from the left to right what we're  
25 seeing in each column.

1 A. Yes. The first column is C22. That is an email sent by  
2 Abdihakim Ahmed of ASA to Salim Said, and it contained  
3 information about the September 2021 rosters.

4 And you will see there's a column with the ages.  
5 Those are the ages shown for those individuals.

6 Q. And that line 1, that's an individual that was from that  
7 real list of adults, correct?

8 A. Yes.

9 Q. And for this September 2021 roster sent to Salim Said,  
10 how old is that first person?

11 A. 16 years old.

12 Q. But then in the next column, October 2021 submission to  
13 Aimee Bock in claims at Feeding Our Future, what happens to  
14 that same person's age?

15 A. The person is now younger by two years.

16 Q. And then in December 2021, the third column, what is  
17 their age?

18 A. Eleven.

19 Q. And that corresponds with C47; is that right?

20 A. Yes. Those are files taken from the search warrant at  
21 Feeding Our Future.

22 Q. And then what's in the last column?

23 A. The last column are the files taken from the Safari Park  
24 Avenue site in a search warrant. And that age is now seven.

25 Q. And again to be clear, line 1: 16, 14, 11, 7 in the

1 span of four months, that is all associated across these  
2 rosters with the same person?

3 A. The same person, yes.

4 Q. So moving below it, what do we see?

5 A. A very similar phenomenon where the person's ages  
6 changing over time and across different exhibits.

7 Q. 17, to 13, back up to 17, dropping all the way down to  
8 8?

9 A. Yes.

10 Q. The next person, what happens to that person's age?

11 A. Again, 16, down to 10, back to 16, and then to 7.

12 Q. These examples you are testifying about, is that true of  
13 every other line as we go down this same list?

14 A. Yes. I think except for maybe that one example that  
15 Hamza, which was a certain age that was hard-coded.

16 Q. Real kids?

17 A. Not real kids. Real people, maybe. Definitely not real  
18 kids.

19 Q. But these claims generated real money?

20 A. Real money.

21 Q. A lot of money?

22 A. Yes.

23 Q. Millions of dollars?

24 A. Yes.

25 Q. Based on information like this that was true or that was

1 false?

2 A. False. Fraudulent.

3 Q. I'm showing you what's been marked, but I don't believe  
4 has been admitted, as Exhibit P22.

5 Which I understand is in, Your Honor.

6 And is this an email message sent by Defendant  
7 Salim Said?

8 A. Yes.

9 Q. And he sent that to which person?

10 A. To Abdulkadir Salah.

11 Q. And was that that same individual you testified about at  
12 the beginning of your testimony?

13 A. Yes, a business partner with Safari Restaurant.

14 Q. His name was on that W exhibit bank record?

15 A. Yes.

16 Q. Together with Salim Said, rather?

17 A. Yes.

18 Q. And Southcross, do you know where that was located?

19 A. Burnsville.

20 Q. And this was a food site?

21 A. A food site, yes.

22 Q. Now, did you review multiple examples of rosters  
23 involving this Southcross site in Burnsville?

24 A. Yes.

25 Q. And they go on for page after page; is that right?

1 A. That's correct.

2 Q. With respect to some of the names on here, did you have  
3 any observations, just sort of eyeballing some of the names?

4 A. Some of the names are frankly absurd.

5 Q. Directing your attention to the third page, what are  
6 some of the examples of that?

7 A. We have a Putify Nop, an eight-year-old.

8 Q. Is Putify Nop a real child?

9 A. Not in Minnesota public schools.

10 Q. Did you run that name through 193,000?

11 A. Yes.

12 Q. Did you run that name through the Burnsville School  
13 District?

14 A. I did.

15 Q. Any indication of a person with the name of Putify?

16 A. No.

17 Q. Real kid?

18 A. Not a real kid.

19 Q. And this said Putify is how old?

20 A. Eight years old.

21 Q. And as we scroll down to the next page, who shows up  
22 just a few lines down?

23 A. Another Putify Nop.

24 Q. Coincidence?

25 A. No.

1 Q. Okay. How old is this second supposed Putify Nop?

2 A. 16 years old.

3 Q. Real kids?

4 A. Not at all.

5 Q. Fake names?

6 A. Fake names.

7 Q. Fake ages?

8 A. Fake ages.

9 Q. Formulas with age generators?

10 A. Formulas with age generators and copy pasting names.

11 Q. Is this the only example of a roster with absurd names

12 like this?

13 A. No. There are many.

14 Q. Showing you Exhibit C34. And is this an email message

15 from Abdulkadir Salah?

16 A. Yes.

17 Q. To a Feeding Our Future email address?

18 A. Yes.

19 Q. And this one, what's in the subject?

20 A. Bet on Better Future.

21 Q. Another party or entity involved in the food program?

22 A. Yes.

23 Q. And what's the date of this message?

24 A. January 7th, 2022.

25 Q. And then a whole series of attachments that are

1 included; is that fair to say?

2 A. Yes.

3 Q. And then within this same attachment of hundreds of  
4 pages, do you see the same sort of pattern of absurd names?

5 A. Yes. Absurd names, names that don't represent kids  
6 actually enrolled at school districts, ages that fluctuate.

7 Q. And including yet another appearance from --

8 A. Another Putify Nop.

9 Q. -- the Nop family?

10 A. Yes.

11 Q. Does that same ridiculous name appear yet again two  
12 times in this same list?

13 A. Yes.

14 Q. Yet again down below, right?

15 A. Yes.

16 Q. Yet this time with a different fake age attached to it?

17 A. Yes.

18 Q. Showing you what has been marked, but not admitted, as  
19 Exhibit LL10, is this another roster that you helped  
20 prepare?

21 A. Yes, I created this.

22 Q. Is it summarizing data contained in underlying exhibits?

23 A. Yes.

24 MR. EBERT: Your Honor, at this time the  
25 government offers Exhibit LL10.

1 MR. UDOIBOK: No objection.

2 MR. MONTEZ: No objection.

3 THE COURT: LL10 is admitted.

4 MR. EBERT: All right. Thank you.

5 BY MR. EBERT:

6 Q. Now, what's the title of your summary?

7 A. Summary of Selected Names Across Different Sites.

8 Q. Okay. And what are the particular names that you  
9 selected?

10 A. I selected three unusual or unique names that stuck out  
11 to me.

12 Q. Which are what?

13 A. Amen Love, Praise Love, and Blessings Love.

14 Q. Did you pick these names?

15 A. I picked them because they stuck out to me when I was  
16 reviewing the roster.

17 Q. So these are names that you saw in rosters?

18 A. Yes.

19 Q. Okay. Did you reference the names Amen Love, Praise  
20 Love, Blessings Love in comparison to the nearly 200,000  
21 names of real children in Minnesota School District records?

22 A. Yes. I made that comparison, and I did not find  
23 children with these names.

24 Q. And those names appear repeatedly throughout the  
25 evidence; is that correct?

1 A. Yes.

2 Q. So, for example, enlarging the first two columns, how do  
3 those names appear?

4 A. Yes. These names appear at Stigma-Free, St. Paul and  
5 also at Southcross.

6 Q. Southcross, that site located in Burnsville?

7 A. Yes.

8 Q. Where else do those names appear?

9 A. Again at Southcross. However, they had different ages.

10 Q. And in the one enlarged on the screen, in what  
11 evidentiary source did you see them again for Southcross?

12 A. The physical files from the Safari Park Avenue site.

13 Q. To the right, do those names appear in another place?

14 A. Stigma-Free, St. Paul, and you will note it's the same  
15 time, December 2021, as what we just we want over.

16 Q. And this time they show up in an email message contained  
17 in Exhibit K8; is that right?

18 A. Yes.

19 Q. And then lastly on the right, how do the names of  
20 supposed children in the Love family appear?

21 A. They appear in Willmar in December of 2021.

22 Q. Also being sent by a Stigma-Free email message to claims  
23 at Feeding Our Future?

24 A. Yes.

25 Q. So these, these names, they don't appear in the school

1 records; is that right?

2 A. Correct.

3 Q. And what happens to their ages across these different  
4 evidentiary sources over time?

5 A. The ages are all different essentially.

6 Q. Okay. Well, the first one, Amen Love is 15 in an email  
7 sent to Salim Said for Stigma-Free, St. Paul supposed  
8 attendance, right?

9 A. Yes.

10 Q. What happens to Amen Love's age when Amen Love appears  
11 in the Burnsville Southcross site for December 2021?

12 A. He's younger by ten years.

13 Q. What happens for Southcross in that same month,  
14 according to the physical records obtained at the Safari  
15 location?

16 A. Now there's an Amen Love that's 13.

17 Q. And then in an email sent by Stigma-Free for the  
18 St. Paul location for Stigma-Free, that same supposed kid is  
19 now 11?

20 A. Yes.

21 Q. And then in the same month, Feeding Our Future claims is  
22 emailed that same bogus kid's name for which location?

23 A. For Willmar.

24 Q. And now the age has bounced to what?

25 A. To nine.

1 Q. This same concept of the age shifting up and down over  
2 time, is that true for supposed Praise Love?

3 A. That's consistent for Praise Love.

4 Q. And --

5 A. And for Blessings Love.

6 Q. Does any of this make any sense whatsoever?

7 A. No, it doesn't make any sense.

8 Q. Is it real?

9 A. The names are fake. The ages are fake. The rosters are  
10 fake. And these three names, just to be clear, these are  
11 three names that I picked as an easy way to reference across  
12 multiple files.

13 There are many, many more names very, very similar  
14 to this that are copied across different sites at the same  
15 time.

16 Q. In this exact same manner?

17 A. Yes.

18 Q. Because the more, the more that is claimed to have eaten  
19 at a place, do you have a sense of what happens in response  
20 to the more you claim?

21 A. The more money you get.

22 Q. You mentioned that there was some examples --

23 Your Honor, I understand that K8, K9, my  
24 apologies, are not in evidence. I would offer those at this  
25 time.

1 THE COURT: Any objection?

2 MR. UDOIBOK: No objection.

3 MR. MONTEZ: No objection.

4 THE COURT: K8 and K9 are admitted.

5 MR. EBERT: Thank you, Your Honor.

6 BY MR. EBERT:

7 Q. You mentioned a few moments ago, Special Agent Parks,  
8 that you observed some instances of real people whose names  
9 would show up in these rosters as supposed kids; is that  
10 right?

11 A. Yes.

12 Q. And those real people, were they kids or generally  
13 adults?

14 A. Adults.

15 MR. EBERT: Your Honor, may I have one moment?

16 THE COURT: You may.

17 BY MR. EBERT:

18 Q. I'm showing you what has been marked, but not admitted,  
19 as Exhibit H21. Do you see that on the screen?

20 A. I do, yes.

21 Q. Is that a true and accurate copy of a record produced by  
22 Google in response to a search warrant?

23 A. Yes.

24 MR. EBERT: Your Honor, at this time the  
25 government offers Exhibit H21.

1 THE COURT: Any objection?

2 MR. UDOIBOK: No objection.

3 MR. MONTEZ: No objection.

4 THE COURT: H21 is admitted.

5 MR. EBERT: Thank you, Your Honor.

6 BY MR. EBERT:

7 Q. This is an email that is dated October 8th of 2021; is  
8 that correct?

9 A. That's correct.

10 Q. And it's sent with an attachment. What is the name of  
11 that attachment?

12 A. Stigma-Free, Mankato September Kids Count, Final.

13 Q. One of the food sites we've heard about in this case; is  
14 that right?

15 A. Yes.

16 Q. And Horseed Management, is that a name you've heard  
17 before?

18 A. Yes, I have.

19 Q. What is Horseed Management?

20 A. It's an entity involved in the case.

21 Q. A supposed food supplier?

22 A. Yes.

23 Q. Now, is there a list of names yet again attached for  
24 children who supposedly were fed by Stigma-Free, Mankato?

25 A. Yes.

1 Q. In Mankato, right?

2 A. Yes.

3 Q. So I want to direct your attention towards the end of  
4 this 40-page document, and I want to specifically direct  
5 your attention to the middle. Among the names that are  
6 here, what do you see?

7 A. A person named Cerresso Fort.

8 Q. Have you met a person named Cerresso Fort?

9 A. Yes, I have.

10 Q. Who is Cerresso Fort?

11 A. Cerresso Fort is the owner of SIR Boxing Club.

12 Q. Where is SIR Boxing Club located?

13 A. On Arcade Street in St. Paul.

14 Q. Have you done a search of whether there are any children  
15 that have the name Cerresso Fort?

16 A. Yes, I did that search, and there are no children with  
17 that name.

18 Q. Have you done a search of this name, period, in  
19 Minnesota, Cerresso Fort?

20 A. Yes, I have. There are no children with that name in  
21 the 20 school districts data that I obtained.

22 Q. And is there one Cerresso Fort that you know of?

23 A. Yes. The owner of SIR Boxing Club, Arcade Street,  
24 St. Paul.

25 Q. I take it then he is not a 7-year-old child?

1 A. No, he's not.

2 Q. I take it he's not a 7-year-old child who supposedly ate  
3 food at Mankato for Stigma-Free; is that right?

4 A. That's right.

5 Q. Is this true?

6 A. This is, this is fraud.

7 Q. Is this the only time that Cerresso Fort's name is used  
8 in this way, claiming that he is a supposed child who ate as  
9 part of the food program?

10 A. You find Cerresso Fort's name in other Mankato rosters.

11 Q. Directing your attention to H54. H54, page 62 of 73,  
12 which was recovered from the Feeding Our Future office when  
13 agents conducted a search warrant.

14 Q. Once again, do we see Cerresso Fort's name?

15 A. Yes, we do.

16 Q. As a supposed child, right?

17 A. Yes.

18 Q. And yet again in H55, this time for the month of  
19 November for Stigma-Free, Mankato, do you see that in the  
20 bottom right?

21 A. I do, yes.

22 Q. Another Feeding Our Future file recovered by federal  
23 agents; is that right?

24 A. Yes.

25 Q. And do you see Cerresso Fort's name again?

1 A. I do. It looks like he is now two years old.

2 Q. Another piece of fake information?

3 A. Yes.

4 Q. Because the more you claim, what happens?

5 A. The more you get paid.

6 MR. EBERT: Thank you. I have no further  
7 questions, Your Honor.

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

9 MR. UDOIBOK: Yes, Your Honor.

10 CROSS-EXAMINATION

11 BY MR. UDOIBOK:

12 Q. Good afternoon.

13 A. Hello, sir.

14 Q. I'm losing my voice, so -- my name is Kenneth Udoibok,  
15 and I have a few questions for you.

16 A. Okay.

17 Q. Ms. Mallet, would you please call up H55?

18 MS. MALLET: 55.

19 MR. UDOIBOK: H55.

20 BY MR. UDOIBOK:

21 Q. I believe you testified to this document, this -- I'm  
22 not going to go through every single one of them with you.

23 A. Okay.

24 Q. You don't want me to do that, but when you analyze this  
25 document as obtained by -- at the Feeding Our Future

1 building, do you know who submitted H55 to Feeding Our  
2 Future?

3 A. I don't specifically know exactly who submitted it to  
4 Feeding Our Future.

5 Q. But at least you know that the roster was not an Excel  
6 document when it was recovered at Feeding Our Future,  
7 correct?

8 A. It was recovered in a physical paper format, from my  
9 understanding.

10 Q. All right. Let's go to H54 page -- H54, page 62. All  
11 right. Page 62.

12 Now, it was, H54 was also recovered at Feeding Our  
13 Future, correct?

14 A. Yes.

15 Q. In a paper format?

16 A. Yes.

17 Q. And the Excel, Excel spreadsheet wasn't recovered -- I'm  
18 not a computer geek.

19 A. Sure.

20 Q. But it wasn't in Excel format, was it? It was in a  
21 paper form.

22 A. This specific piece of evidence was in paper format,  
23 yes.

24 Q. Now let's go to H21. Go to page 2.

25 Before you go to page, you go to page 1, please.

1 Call out the from and attachment.

2 You testified to this. This exhibit was sent from  
3 Horseed Management, correct?

4 A. Yes.

5 Q. To TFS Auditors, correct?

6 A. Yes.

7 Q. And it's an Excel format?

8 A. Correct.

9 Q. And it wasn't sent to -- this email wasn't sent to  
10 Ms. Bock, was it?

11 A. Not in this email, no.

12 Q. All right. Let's go to L10. Call out the Love, name  
13 Amen Love and Praise Love, what, you have it. Call out the  
14 entire block, please. Just expand it so that we can read  
15 it. All right.

16 So I just want to understand what your testimony  
17 was. Your summary of the selected names, correct me if I am  
18 wrong, taken C28, the email went from Mr. Ahmed to Mr. Said,  
19 correct?

20 A. Yes.

21 Q. All right. Not to Ms. Bock, correct?

22 A. That's correct.

23 Q. And then in the second column, C34, the email went from  
24 Mr. Salah to someone Asia at Feeding Our Future, correct?

25 A. That's correct.

1 Q. But not Ms. Bock?

2 A. Not Ms. Bock in this email directly.

3 Q. And then the FF38, that's a physical file. Is that --  
4 it is blank there. What was that about?

5 A. It's blank because it's not an email message sent from  
6 anybody or received by anybody. It's a physical file  
7 recovered.

8 Q. All right. And then at K8, there's an email to  
9 Stigma-Free -- from Stigma-Free to claims at Feeding Our  
10 Future, correct?

11 A. Correct.

12 Q. And you make an assumption that Ms. Bock received that  
13 email, correct?

14 A. I know Feeding Our Future received that email.

15 Q. Yes, I know. My question, though, is, Do you have any  
16 evidence that Ms. Bock received that email?

17 A. I understand Ms. Bock has access to that shared  
18 claims@feedingourfuturemn.org account.

19 Q. I don't know what you mean by "access." My question,  
20 rather, is, Do you have any evidence that Ms. Bock herself  
21 received that email?

22 A. I don't have evidence if she opened the document or  
23 received this email.

24 Q. Thank you.

25 And does that also apply to K9?

1 A. Yes.

2 Q. All right. I want to kind of shift focus a little bit  
3 to your understanding of these rosters. Okay?

4 A. Okay.

5 Q. When did you start? When was your involvement in this  
6 investigation?

7 A. I started on this investigation in February of 2024.

8 Q. February 2024. And then when did you do the analysis of  
9 these rosters?

10 A. I did this specific analysis starting in November of  
11 2024, and I finished up in the last week or so.

12 Q. And by the time you had commence your investigation, you  
13 were aware that back in 2022 that there was a search warrant  
14 executed at the Feeding Our Future building, correct?

15 A. That's my understanding, yes.

16 Q. And before you got involved, you also were aware that  
17 there was an indictment, correct?

18 A. Yes.

19 Q. Okay. So your investigation was not, you weren't doing  
20 it as a neutral. You were investigating culpability,  
21 correct?

22 A. To be clear, when I joined the team, I had an open mind,  
23 followed the evidence.

24 Q. Yes.

25 A. And if you take two seconds looking at these rosters,

1 you know they are fake. And so my opinion quickly, quickly  
2 shifted right when I started reviewing the evidence. But I  
3 came in with an open mind.

4 Q. All right. So but as you reviewed those rosters, did  
5 your investigation lead you to conclude that Ms. Bock, if  
6 possible, was a recipient of the roster, correct?

7 A. Yes, Ms. Bock received the rosters.

8 Q. And were you aware that as that '22, between 2020 and  
9 2022, there was some national waivers of attendance  
10 requirement? Were you aware of that?

11 MR. EBERT: Objection. Assumes facts not in  
12 evidence. It's also beyond his personal knowledge and  
13 beyond the scope.

14 THE COURT: Overruled.

15 You can answer.

16 THE WITNESS: Can you repeat the question, sir?

17 BY MR. UDOIBOK:

18 Q. Are you aware of waivers in existence between 2020 and  
19 2022 regarding attendance?

20 A. Yes, I've heard of waivers.

21 Q. So did it occur to you as you were investigating that  
22 the rosters were not necessary, were they?

23 A. They were used to further the scheme.

24 Q. I realize that.

25 A. They were lists of names sent --

1 Q. No, sir. My question is, I just want to know, Were  
2 rosters required as a condition of the food program?

3 A. I don't know that.

4 Q. All right. Now, is it possible that Feeding Our Future  
5 was requiring rosters as a means of making certain that  
6 sites comply with the number of children they would have  
7 fed?

8 MR. EBERT: Your Honor, may we approach?

9 THE COURT: You may.

10 **(Sidebar discussion)**

11 THE COURT: Mr. Ebert.

12 MR. EBERT: Can you hear me?

13 THE COURT: Yes.

14 MR. EBERT: I asked for this, Your Honor, because  
15 I want to just flag that I think the crux of the last series  
16 of questions I think is improper. I think it's confusing to  
17 the jury. I think it's, frankly, attorney argument that is  
18 sort of masquerading as a question.

19 And I think -- first of all, I don't think that  
20 this line of questioning is proper. It's introducing  
21 formulations about events that frankly are not true or  
22 accurate.

23 And I think if these are arguments that counsel  
24 wants to make later on, that's fine, but I think it's  
25 misleading and confusing to the jury and in its current form

1 the way he's asking them.

2 THE COURT: Mr. Udoibok.

3 MR. UDOIBOK: Your Honor, this is  
4 cross-examination. The witness has testified about fraud,  
5 testified that the roster was in furtherance of fraud. I'm  
6 at liberty to cross-examine him about the knowledge, his  
7 knowledge about even the fraud and the actions of the  
8 parties involved.

9 THE COURT: Right. What you are suggesting is  
10 that the rosters weren't required. And -- is that right?  
11 Is that what you are suggesting?

12 MR. UDOIBOK: The waivers, there were waivers in  
13 existence at that time. He cannot --

14 THE COURT: That waived -- wait. That waived  
15 rosters?

16 MR. UDOIBOK: Waived attendance, yeah.

17 THE COURT: Hang on.

18 Mr. Ebert, is that the case at this time?

19 MR. EBERT: That is not the case, Your Honor.  
20 We've had clear testimony and evidence about this. We  
21 heard, first and foremost, from Emily Honer from MDE clearly  
22 and emphatically on these issues, and she said that that is  
23 categorically not the case.

24 Rosters were required, full stop. And so the  
25 concern that I have here is, any suggestion that's in

1 conflict with that is highly misleading and confusing to the  
2 jury.

3 THE COURT: Mr. Udoibok, do you have any offer of  
4 proof that there was a waiver of the roster requirement?

5 MR. UDOIBOK: Yes. Attendance, congregation. Let  
6 me pull it up now just for the court's -- just a second. If  
7 you give me a minute, Your Honor. D1 --

8 THE COURT: All right. Just a minute. I'm going  
9 to excuse the jury, and then we'll go into this.

10 **(In open court)**

11 THE COURT: All right. Members of the jury, I'm  
12 going to address this issue with the attorneys, so I'm going  
13 to let you all go and tell you to come at 9:00 tomorrow  
14 morning.

15 All rise for the jury.

16 4:46 p.m.

17 **IN OPEN COURT**

18 **(JURY NOT PRESENT)**

19 THE COURT: All right. We're on the record out of  
20 the presence of the jury, and I've asked the witness to step  
21 out.

22 Mr. Udoibok, I want to make sure that I hear you  
23 out on this issue. And what we discussed at the sidebar was  
24 that you believe that there was a waiver of the roster  
25 requirement and, thus, you want to cross-examine this

1 witness about that waiver, given his testimony about the  
2 rosters.

3 Mr. Ebert's position is that Ms. Honer testified  
4 unequivocally that there is no waiver of the roster  
5 requirement. I asked you for an offer of proof as to that  
6 waiver. And then I'm going to ask you what you want to ask  
7 this witness.

8 MR. UDOIBOK: Your Honor, I wanted to make certain  
9 with the witness, because the government has given the  
10 narrative that the roster coming from the sites was, the  
11 rosters were in furtherance of fraudulent activity by FOF  
12 and specifically the emails that Ms. Bock may have received.

13 Now, it's not in evidence, but Exhibit D1-224 is  
14 the USDA publication that speaks Question 9, if the court  
15 would --

16 You didn't need to -- I know off the top of my  
17 head.

18 THE COURT: I don't -- I don't have it. Can I see  
19 it, please?

20 MR. UDOIBOK: Yes.

21 Can you pull it up?

22 We have it on our Trial Directory, D1-224,  
23 Question 9.

24 224. Question 9.

25 THE COURT: It's just for me, Ms. Wegner, thank

1 you, and the attorneys.

2 Go ahead. Thank you.

3 MR. UDOIBOK: Question 19. Sorry. Is it 19? 19,  
4 correct.

5 Call it out so the court can --

6 So this is a question. This is the memorandum  
7 from USDA to the public, is, "After-school centers need to  
8 maintain daily attendance records."

9 It's clear from their writing that the waiver  
10 waived those.

11 THE COURT: All right. Thank you.

12 Mr. Ebert.

13 MR. EBERT: So, Your Honor, the inquiry that  
14 counsel apparently wants to make strikes me as of the type  
15 of thing that may have been fodder for cross-examination of  
16 Emily Honer several weeks ago. But here we are weeks later,  
17 and now there's an IRS special agent testifying, who I don't  
18 believe has ever seen that document or has any information  
19 about it.

20 So as a matter of foundation, I think it's  
21 entirely improper to foist that upon him for some exercise  
22 to see what his reaction is to it. If counsel wants to call  
23 some other witness or introduce it in some other way that he  
24 may choose to see fit, then perhaps, but I don't think that  
25 this agent is the appropriate vehicle.

1           Also, frankly, the crux of what we just heard on  
2           direct had nothing to do with the requirements yea or nay  
3           about such a roster. I don't think any testimony was  
4           elicited on whether they were required or voluntary. The  
5           point was not that.

6           The point was, what types of documents are  
7           repeatedly being submitted to support false and fraudulent  
8           claims to get money. And that's in the form of invoices.  
9           It's in the form of meal counts, and it's repeatedly in the  
10          form of bogus rosters.

11          And so whether they were required, voluntary, is  
12          frankly not relevant. What's relevant is what types of  
13          tools were being used to advance this fraud by the  
14          defendants. That was the purpose of the testimony.

15          I think to try to introduce these regulatory  
16          C.F.R. items is far beyond the foundation for this witness  
17          to testify about.

18          THE COURT: Anything in response, Mr. Udoibok?

19          MR. UDOIBOK: Yes, Your Honor.

20          I never got far enough. I only wanted to  
21          determine whether the witness knew that the roster was not  
22          required. That's it.

23          THE COURT: You are saying it as though it is  
24          true, right? You can say, Do you know the regulation,  
25          without saying, Do you know, and then testify.

1           MR. UDOIBOK: Your Honor, I could do that, but it  
2 was a simpler question than the government is trying to make  
3 it seem.

4           The witness made comments about the roster was in  
5 furtherance of the conspiracy. One thing he doesn't know  
6 that Feeding Our Future even submitted that roster. It  
7 didn't because it wasn't necessary, so -- but here we are.  
8 You -- one cannot violate a law that doesn't exist.

9           THE COURT: Okay. This witness is not the right  
10 witness to testify about what the regulations required with  
11 respect to rosters. He doesn't have the knowledge, I don't  
12 think, and so he's not the right witness to do it.

13           Another witness may be the right witness to  
14 testify about regulations. This witness is an IRS agent.

15           MR. UDOIBOK: I realize that, Your Honor, but he  
16 is an IRS agent that is giving an opinion about the conduct  
17 of my client in furtherance of fraud. What is the  
18 fraudulent activity that Feeding Our Future is engaged in  
19 with the rosters that wasn't required? That's --

20           THE COURT: Again, I don't think that this witness  
21 can testify about whether the rosters were required or not.  
22 What he's testifying about is whether they were fake or not.

23           MR. UDOIBOK: Well, Your Honor, he can say whether  
24 he knows, whether he knows one way or the other. If he's  
25 incompetent about the regulation, that's fine.

1 THE COURT: You may ask him whether he is familiar  
2 with the USDA regulations as to the requirements of rosters,  
3 if you ask it in that way.

4 MR. UDOIBOK: Thank you, Your Honor.

5 THE COURT: All right. We're going to end for the  
6 day. We'll pick up tomorrow morning at 9:00.

7 THE CLERK: All rise.

8 (Court adjourned at 4:54 p.m., 02-26-2025.)

9 \* \* \*

10 I, Renee A. Rogge, certify that the foregoing is a  
11 correct transcript from the record of proceedings in the  
12 above-entitled matter.

13 Certified by: /s/Renee A. Rogge  
14 Renee A. Rogge, RMR-CRR

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