

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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),)	Thursday, February 27, 2025
)	9:03 a.m.
Defendants.)	
)	

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

VOLUME XII - JURY TRIAL PROCEEDINGS

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

* * *

Proceedings recorded by mechanical stenography;
Transcript produced by computer.

* * *

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

APPEARANCES:

For Plaintiff: UNITED STATES ATTORNEY'S OFFICE
BY: JOSEPH H. THOMPSON
HARRY JACOBS
MATTHEW S. EBERT
DANIEL W. BOBIER
600 United States Courthouse
300 South Fourth Street
Minneapolis, Minnesota 55415

For Defendant KENNETH UBONG UDOIBOK P.A.
Aimee Marie Bock(1): BY: KENNETH U. UDOIBOK
310 Fourth Avenue South, #5010
Minneapolis, Minnesota 55415

For Defendant COLICH & ASSOCIATES
Salim Ahmed Said(3): BY: MICHAEL J. COLICH
ADRIAN SCOTT LAFAVOR-MONTEZ
RAGHEN LUCY
10 South Fifth Street, #420
Minneapolis, Minnesota 55402

* * *

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I N D E X

PAGE

JOSHUA PARKS

Cross-Examination By Mr. Udoibok	2613
Cross-Examination By Mr. Montez	2633
Redirect Examination By Mr. Ebert	2638
Recross-Examination By Mr. Udoibok	2642

MOHAMED HUSSEIN

Direct Examination By Mr. Bobier	2644
Cross-Examination By Mr. Udoibok	2701

JOHN SENKLER

Direct Examination By Mr. Jacobs	2755
Cross-Examination By Mr. Udoibok	2766

TRAVIS WILMER

Direct Examination By Mr. Bobier	2768
----------------------------------	------

GOVERNMENT'S EXHIBITS

REC'D

A21	2827
A23	2835
A82	2774
T70	2795
T91	2792
U10	2819
GG36	2794

* * *

1 BY MR. UDOIBOK:

2 Q. All right. And so you relied on the information the
3 witnesses provided you, correct?

4 A. Yes.

5 Q. And so you did not review the regulations impacting the
6 nutrition food program?

7 A. That's correct.

8 Q. All right. And who are these witnesses that you relied
9 on?

10 A. Several MDE employees.

11 Q. Several MDE employees. Is that a practice that you
12 don't consult the regulation itself to inform you of what
13 the legal parameters may be in your investigation?

14 A. That wasn't part of my scope and what I was doing as
15 part of the investigation.

16 Q. Don't you believe that the waiver program from USDA
17 impacting the program that you investigating is important
18 for you to consult the regulation?

19 MR. EBERT: Your Honor, objection.

20 THE COURT: Sustained.

21 BY MR. UDOIBOK:

22 Q. All right. So your testimony is, you did not consult
23 the USDA regulation impacting the nutrition food program,
24 correct?

25 MR. EBERT: Objection. Asked and answered.

1 THE COURT: Sustained.

2 BY MR. UDOIBOK:

3 Q. All right. So you trusted MDE witnesses, correct?

4 MR. EBERT: Your Honor, may we approach?

5 THE COURT: Is there an objection to the question?

6 MR. EBERT: There's an objection to this entire
7 line of questioning.

8 THE COURT: All right.

9 **(Sidebar discussion)**

10 THE COURT: Mr. Ebert.

11 MR. EBERT: Thank you, Your Honor.

12 I feel like we're right back where we were prior
13 to our sidebar yesterday evening. This is simply
14 introduction of attorney argument, and that's all it is. It
15 is just rank argument. It's assuming facts not in evidence.

16 The entire crux of the direct of this witness had
17 to do with the falsity of those rosters, and so to sort of
18 launch into these loaded questions that are laden with
19 argument about MDE regulations lacks foundation, and it's
20 just altogether improper.

21 THE COURT: Mr. Udoibok.

22 Nope. You are not on, I don't think.

23 MR. UDOIBOK: Can you hear me now, Judge?

24 THE COURT: Now I can, yes.

25 MR. UDOIBOK: Thank you.

1 The question was whether he's familiar with the
2 USDA regulation impacting the food program. He said no. I
3 asked him, is it important that he would know the regs
4 impacting his investigation. He relied on MDE witnesses.

5 And the next question was objected to and
6 sustained, which would have been hearsay. And I wanted to
7 ask him whether he trusted the representation given to him
8 by MDE.

9 THE COURT: About what?

10 MR. UDOIBOK: About the food program, the waiver.

11 THE COURT: It has nothing to do with whether the
12 rosters were fake, though.

13 MR. UDOIBOK: That's not the issue. The issue is,
14 Feeding Our Future and the sites supposedly from the
15 narrative of the government used the roster in furtherance
16 of fraud.

17 Our position is, the roster was unnecessary.

18 THE COURT: Okay. You can argue that in closing.
19 This witness doesn't know anything about whether it is
20 necessary or not. That's a closing argument. It is not a
21 question for this witness.

22 MR. UDOIBOK: May I, Your Honor? The witness has
23 testified that it is fraudulent.

24 THE COURT: That it's fake.

25 MR. UDOIBOK: That it's fake.

1 THE COURT: It has nothing to do with whether it's
2 required.

3 MR. UDOIBOK: Well, if it's not required, it
4 cannot be fake, because there's no purpose to it.

5 THE COURT: That's not true. Mr. Udoibok, I've
6 ruled. You need to respect my ruling.

7 **(In open court)**

8 BY MR. UDOIBOK:

9 Q. So I understand, Officer, I mean, Investigator --
10 What's your title? I've forgotten already.

11 A. My title is special agent, but you can call me officer,
12 investigator. Those are both fine.

13 Q. Thank you. I don't want to diminish your position here.

14 A. No.

15 Q. So I understand your testimony, you are not familiar
16 with the USDA regs, correct?

17 MR. EBERT: Objection, Your Honor.

18 THE COURT: That's asked and answered.

19 MR. UDOIBOK: All right.

20 BY MR. UDOIBOK:

21 Q. And you talked to folks from MDE.

22 MR. EBERT: Objection, Your Honor. Asked and
23 answered.

24 THE COURT: Sustained.

25

1 BY MR. UDOIBOK:

2 Q. All right. But nonetheless -- all right. You, you went
3 out to determine whether that roster was real or not,
4 correct?

5 A. Yes.

6 Q. All right. Now, did your investigation lead you to
7 determine whether the roster was used by Feeding Our Future
8 in any way?

9 A. The rosters were collected by Feeding Our Future.

10 Q. The roster was, was it collected or sent to Feeding Our
11 Future?

12 A. Correct.

13 Q. Which is correct? Sent or collected?

14 A. They were sent to Feeding Our Future.

15 Q. All right. Feeding Our Future did not create the
16 roster, did it?

17 A. I don't know that to be true. It's possible that
18 Feeding Our Future could have been involved in creating the
19 rosters, but I don't know that to be true either way.

20 Q. Okay. So it is possible -- we don't have any evidence
21 as you sit here today that Feeding Our Future participated
22 in creating the roster?

23 A. One example I would use is the name Cerresso Fort, which
24 was found to be a person at a Feeding Our Future site,
25 right? That was an owner of a location purportedly serving

1 meals under the sponsorship of Feeding Our Future.

2 And then we found that name at Stigma-Free,
3 Mankato. I don't know how that name got there, but --

4 Q. So it is good not to speculate, right?

5 A. I agree.

6 Q. All right. Let's take the name Cerresso. All right?

7 A. Okay.

8 Q. Do you have any evidence that Feeding Our Future created
9 the roster? Simply as a yes or no.

10 A. I don't have any evidence.

11 Q. Okay. Do you have any evidence that Ms. Bock created
12 the roster?

13 A. No.

14 Q. Okay. Well, let's go to -- Ms. Mallet, would you call
15 up LL10.

16 I believe you started testifying to this
17 yesterday. Do you recall?

18 A. Yes, I do.

19 Q. Now, looking at Exhibit LL10, is there anywhere in
20 Exhibit LL10 where Ms. Bock is sending anyone an email?

21 A. No.

22 Q. Okay. Let's go to C34. Call out the top portion.

23 A. Yes. This is an email sent from Abdulkadir Salah to
24 asia@feedingourfuturemn.org.

25 Q. And because you reviewed this before, I don't want to go

1 through all 456 pages. Do you want me to do that?

2 A. That's up to you.

3 Q. All right. I don't want to do it. So, but, nonetheless
4 if you look at the attachment, are they all PDFs?

5 A. Yes.

6 Q. All right. And the attachment is not sent to Ms. Bock,
7 is it?

8 A. The attachment is sent to asia@feedingourfuturemn.org.

9 Q. All right. And the attachment would not contain an
10 Excel formula, does it?

11 A. These are PDFs, so no.

12 Q. Thank you.

13 Ms. Mallet, please call up P22. Call up the top
14 corner.

15 This is an email from Salim Said to Salah,
16 correct?

17 A. Yes.

18 Q. This email is not sent or was not sent to Ms. Bock, was
19 it?

20 A. It was not.

21 Q. Okay. Thank you.

22 Please go to page 3 of P22.

23 This is a list of names, correct?

24 A. I agree.

25 Q. And you also, you testified that it wasn't sent to

1 Feeding Our Future, correct?

2 A. This specific email --

3 Q. Yes.

4 A. -- was not sent.

5 Q. So the list here, you determined that it was, this list
6 was a public school list? Is that -- I'm not sure what your
7 testimony was? Was it a list of public school students or
8 private school students?

9 A. Can you rephrase your question?

10 Q. Well, this list, you testified that you checked with the
11 public schools, correct?

12 A. Correct.

13 Q. Did you check private schools?

14 A. I did not have private school records.

15 Q. Okay. Let's go to LL9. 9? LL9.

16 You testified that this is a summary that you
17 prepared relating to ASA, correct?

18 A. Correct.

19 Q. Did Ms. Bock send this list to anyone?

20 A. I don't know if she sent it to anybody, but I don't have
21 evidence to suggest that she did.

22 Q. Okay. Thank you.

23 Let's go to LL8.

24 This is another list, summary of roster that you
25 created, correct?

1 A. Correct.

2 Q. Would you, Ms. Mallet, could you call up the top half?

3 So C22 is from whom?

4 A. Abdihakim Ahmed.

5 Q. To whom?

6 A. Salim Said and tfsauditors@gmail.com.

7 Q. All right. So running through C22, Z12 and C33, did
8 Ms. Bock send any of those emails?

9 A. Not on this summary chart.

10 Q. All right. Thank you.

11 Ms. Mallet, would you call out C48.

12 Again, I just want to understand what your
13 testimony is. The attachment, as you testified earlier,
14 it's an Excel sheet, correct?

15 A. Correct.

16 Q. And, again, this email with the attachment did not come
17 from Ms. Bock, did it?

18 A. It did not.

19 Q. Thank you.

20 Ms. Mallet, would you call up LL5?

21 This was -- I don't know how you pull it out --
22 but some kind of website strategy or device you used to come
23 up with these names, correct?

24 MR. EBERT: Objection. That misstates his
25 testimony.

1 THE COURT: Overruled.

2 You may answer. You can recall your testimony.

3 THE WITNESS: Can you rephrase your question, sir?

4 MR. UDOIBOK: I'll try. I'll make it easier for
5 you. What is this?

6 THE WITNESS: So during the investigation we found
7 on email with an attachment. The attachment had a list of
8 about 300 surnames on it.

9 BY MR. UDOIBOK:

10 Q. Okay.

11 A. Those 300 surnames had hyperlinks to an outside website.

12 Q. So what's a hyperlink? I don't know what that is.

13 A. Yeah. It's a connection, essentially a piece of
14 computer code that says, when you click on this button, go
15 reach out to the internet and call up that website.

16 Q. Okay.

17 A. That's a specific address.

18 Q. Is this a little thing that when you put your cursor, it
19 calls up a series of things, numbers and HH dash, dash,
20 something like that?

21 A. Potentially, yes, and you can see that here in this
22 exhibit, right? You see HTTPS.

23 Q. All right.

24 A. Yeah.

25 Q. So, but during this investigation did that hyperlink

1 come from Ms. Bock?

2 A. Not that I know of.

3 Q. Okay. Thank you.

4 Let's go to C21.

5 This is another email with an Excel attachment.

6 Did it come from Ms. Bock?

7 A. It did not.

8 Q. Let's go to C -- let's see -- LL6, I believe.

9 And you testified that this was a, what, a
10 screenshot?

11 A. Yes.

12 Q. All right. Ms. Mallet, could you call up the top
13 corner, please.

14 Now, was this Excel creation from Ms. Bock?

15 A. I don't know who created this document.

16 Q. But you don't, you don't have any evidence that Ms. Bock
17 created it, correct?

18 MR. EBERT: Objection, Your Honor. Lack of
19 personal knowledge.

20 THE COURT: Overruled.

21 You can answer if you can.

22 THE WITNESS: Can you restate your question?

23 BY MR. UDOIBOK:

24 Q. Did Ms. Bock create this exhibit?

25 A. Not that I know of.

1 Q. Let's go to C20. Call out the top half.

2 Again, did you testify to this being an Excel
3 document?

4 A. Yes.

5 Q. Did Ms. Bock create this?

6 A. Not that I know of.

7 Q. Do you have any evidence that she did create it?

8 A. No.

9 Q. Let's go to C47.

10 I believe you testified to this yesterday that
11 these were documents found at the Feeding Our Future; is
12 that correct?

13 A. Yeah, I believe these are physical files found at
14 Feeding Our Future.

15 Q. Do you know how it was found?

16 A. Found via search warrant.

17 Q. All right. And let's go to page 7.

18 And you found the roster, correct?

19 A. Correct.

20 Q. And do you have any evidence that Ms. Bock created that
21 roster?

22 MR. EBERT: Your Honor, I object to the form of
23 the question. Beyond his personal knowledge.

24 THE COURT: Sustained.

25

1 BY MR. UDOIBOK:

2 Q. Do you know who created it?

3 A. I do not.

4 Q. Do you know why -- I withdraw that.

5 Let's go to Z12. Call out the top half. Top
6 corner. Sorry.

7 This is an email from Ahmed to Feeding Our Future
8 claims and Ms. Bock and another employee at Feeding Our
9 Future, correct?

10 A. Yes.

11 Q. And there's an attachment, correct?

12 A. Yes, there are multiple attachments.

13 Q. And the attachments are all PDF, correct?

14 A. Yes.

15 Q. All right. And go to page 10.

16 All right. And you testified that this was
17 another roster, correct?

18 A. Yes.

19 Q. All right. And the roster was sent, correct, to Feeding
20 Our Future, correct?

21 A. Yes.

22 Q. All right. Thank you.

23 Let's go to C, I believe C28. Call out.

24 This is an email from Ahmed?

25 A. Yes.

1 Q. All right. And the email is not sent to Ms. Bock,
2 though, is it?

3 A. This email is not.

4 Q. And there's a series of attachments to this email,
5 correct?

6 A. Correct.

7 Q. Let's go to I believe LL4. Call out the top, all of it.
8 There you go.

9 This, again, was, was it a summary, your summary?

10 A. Yes.

11 Q. All right. And I believe you've testified that C28 and
12 Z12 were emails from Ahmed, correct?

13 A. Correct.

14 Q. And Z12 was sent to Ms. Bock, correct?

15 A. Yes.

16 Q. And then C28 was sent to Mr. Said?

17 A. Yes.

18 Q. And they all relate to roster, correct?

19 A. Yes.

20 Q. And I believe you testified that Feeding Our Future
21 received PDF attachment of the rosters, correct?

22 A. Correct.

23 Q. And as far as Exhibit LL4 is concerned, Ms. Bock only
24 received Z12, PDF attachment of the roster, correct?

25 A. Correct.

1 Q. Let's go to K3.

2 K3 is another exhibit that you testified to
3 yesterday. Again, there are PDF attachments, correct?

4 A. Yes, and Excel.

5 Q. And Excel?

6 A. Yes.

7 Q. But they were not sent to Ms. Bock, were they?

8 A. No.

9 Q. I believe you spoke at length about LL3.

10 Ms. Mallet, would you call up LL3, please.

11 This is, again, your summary, correct?

12 A. Yes.

13 Q. And based on your review and summary of the roster, is
14 it fair to say that Ms. Bock did not send any roster to
15 anyone?

16 A. Not on this summary chart.

17 Q. Thank you.

18 Officer, I want to shift focus a little bit to the
19 pandemic times. All right?

20 A. Okay.

21 Q. And is it fair to say that this roster was sent anywhere
22 between 2020 and 2021?

23 A. The majority of rosters that I reviewed were in the fall
24 of 2021.

25 Q. All right. And I believe you also -- I'm not sure.

1 Correct me if I'm wrong. You believe that the rosters were,
2 were fake and, and they did not represent the meal counts
3 that ultimately was produced, correct?

4 A. Correct.

5 Q. All right. And when you did your analysis, you took
6 into consideration the number of students in a particular
7 school district, correct?

8 A. Yes.

9 Q. And you also testified that you did not take into
10 account private schools, correct?

11 A. Correct.

12 Q. Did you take into account charter schools?

13 A. I did not.

14 Q. And during the pandemic times when there were no
15 schools, right? Noncongregation, you remember those times,
16 right?

17 A. Say that again please?

18 Q. There was times in 2020 when there was no school
19 attendance, correct, during COVID?

20 MR. EBERT: Objection. I don't understand the
21 scope.

22 THE COURT: Overruled.

23 You may answer if you can.

24 THE WITNESS: Your question is -- can you please
25 repeat your question, sir?

1 BY MR. UDOIBOK:

2 Q. Well, during the pandemic in 2020, schools were closed,
3 correct?

4 A. Correct.

5 Q. And so by schools being closed, kids could not
6 congregate in schools, correct?

7 MR. EBERT: Objection. Assumes facts not in
8 evidence.

9 THE COURT: Sustained.

10 BY MR. UDOIBOK:

11 Q. All right. So you did not consider, you did not
12 consider private schools, charter schools in your
13 computation, correct?

14 MR. EBERT: Objection. Asked and answered several
15 times.

16 THE COURT: Sustained.

17 BY MR. UDOIBOK:

18 Q. Let me try it this way.

19 Did you determine when you looked at the roster in
20 public schools where the parents of the children lived?

21 A. I did not have access to the parents of the public
22 school children.

23 Q. Did you determine where the parents worked?

24 A. No.

25 Q. Now, and in the case of children who cannot drive, you

1 would assume the parents will pick up meals for them,
2 correct?

3 MR. EBERT: Objection. This calls for
4 speculation.

5 THE COURT: Sustained.

6 BY MR. UDOIBOK:

7 Q. All right. So did you consider that anyone can pick up
8 food in any location in the State of Minnesota?

9 MR. EBERT: Objection. Assumes facts not in
10 evidence.

11 THE COURT: Sustained.

12 BY MR. UDOIBOK:

13 Q. All right. I will try a different way.

14 Because you restricted your investigation to the
15 number of students in attendance in a public school, you did
16 not consider other variables that would impact the number of
17 meals picked up at a site?

18 MR. EBERT: Objection to the form of the question,
19 and it misstates his testimony.

20 THE COURT: Overruled.

21 You may answer.

22 THE WITNESS: I disagree. I did consider other
23 variables. It wasn't solely just a consideration of the
24 numbers that matched the local public school district. I
25 looked up how many kids are generally home-schooled, for

1 example. The Census Bureau publishes some of those
2 statistics. There's very few home-schooled children, for
3 example. So I feel very comfortable saying that these
4 rosters are not lists of a bunch of home-schooled kids.

5 I looked at a bunch of school districts in
6 neighboring areas. That's why we obtained, you know, 20
7 public schools. Maybe the St. Paul kids are actually eating
8 in Minneapolis.

9 I ran those same comparisons, and I still found
10 very little overlap from the rosters to the public school
11 district records. So even if there is an open site, I'm
12 still comfortable that we've accounted for that.

13 BY MR. UDOIBOK:

14 Q. Is your account for that documented? Is that
15 documented?

16 A. That is not documented in the summary rosters I've
17 shared.

18 Q. All right. Those kids allowed to pick up food, aren't
19 they?

20 MR. EBERT: Objection. Assumes facts not in
21 evidence.

22 THE COURT: Sustained.

23 BY MR. UDOIBOK:

24 Q. So is it fair to say that your comparison did not take
25 into account some other variables other than just members of

1 a school district?

2 MR. EBERT: Objection. This has been asked and
3 answered several times.

4 THE COURT: Sustained.

5 MR. UDOIBOK: No further questions.

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

7 MR. MONTEZ: Thank you, Judge.

8 THE COURT: Thank you.

9 CROSS-EXAMINATION

10 BY MR. MONTEZ:

11 Q. Good morning, sir.

12 A. Good morning, sir.

13 Q. I'm just going to kind of go over some of the emails
14 that we've looked at several times, but I'm just going to
15 kind of orient in terms of when these emails were sent.

16 Is that okay?

17 A. Okay. Sounds great.

18 Q. All right. Can we start with C20.

19 Now as we've already seen, this is an email that
20 was sent from an individual Abdihakim Ahmed to some email
21 address, which is Faaris Studio in Minneapolis; is that
22 true?

23 A. Yes.

24 Q. Now do you know who Abdihakim Ahmed is?

25 A. He is one of the owners of ASA.

1 Q. Okay. This email was sent October 7th, 2021, at
2 approximately 2:44 p.m.; is that true?

3 A. Yes.

4 Q. Now this email sent from Abdihakim Ahmed, one of the
5 owners of ASA, to this email address is asking whoever is on
6 the receiving end of this, can you make all the kids ages 6
7 to 17, true?

8 A. Yes.

9 Q. Salim Said is not on this email; is that correct?

10 A. Correct.

11 Q. Okay. Can we please pull up C21.

12 Now this is an email from Faaris Studio, right?
13 So the recipient of the previous email is now responding
14 essentially to Abdihakim Ahmed, the owner of ASA, true?

15 A. Correct.

16 Q. And in this email, which you testified to yesterday, was
17 an attachment that had a list of surnames; is that true?

18 A. I believe that is correct.

19 Q. And on those surnames there were links to a website
20 where you would click on it, and they would show you, okay,
21 these are all of the surnames that we're using to
22 essentially autopopulate this roster; is that true?

23 A. Yes.

24 Q. Okay. Salim Said is not on this email; is that correct?

25 A. Correct.

1 Q. Now this email is sent October 21st -- I'm sorry --
2 October 7th, 2021, at 7:14 p.m.; is that true?

3 A. Yes.

4 Q. Can we pull up C22, please.

5 Okay. Now this is an email from Abdihakim Ahmed,
6 the owner of ASA, correct?

7 A. Yes.

8 Q. To TFS Auditors, and now Salim Said is included on this
9 email; is that correct?

10 A. Yes.

11 Q. Okay. TFS Auditors, can you remind the jury? Do you
12 know who the owners of TFS is, Total Financial Solutions?

13 A. I don't specifically recall the name, but I am aware of
14 the individual.

15 Q. Does Abdulkadir Nur Salah sound correct?

16 A. I think that is correct.

17 Q. And he has a brother; is that true?

18 A. I believe so, yes.

19 Q. Ahmed Omar-Hashim?

20 A. I don't know if that is his brother's name, but that may
21 be correct.

22 Q. Okay. Now, this email includes this purported fake
23 roster, true?

24 A. Yes.

25 Q. Okay. But it doesn't include the email with the

1 randomly generated Excel spreadsheet; is that correct?

2 A. I believe this spreadsheet contains the formula driving
3 the ages.

4 Q. Okay. But it doesn't say in this email, can you make
5 all the kids ages 7 to 17, correct?

6 A. Correct.

7 Q. It doesn't state in there, hey, here's a link to a
8 website with a bunch of surnames, correct?

9 A. Correct.

10 Q. Thank you.

11 And this email is sent October 7th, 2021, at about
12 9:32 p.m.; is that correct?

13 A. Yes.

14 Q. Can we pull up Z12, please.

15 Now, you testified yesterday that this is directly
16 related to a specific count in the indictment; is that
17 correct?

18 A. Yes.

19 Q. This is an email from who?

20 A. This is an email from Abdihakim Ahmed.

21 Q. The same Abdihakim Ahmed who had previously emailed
22 Faaris Studio, asking them to make all the kids ages 7 to
23 17, true?

24 A. True.

25 Q. The same Abdihakim Ahmed who received an email with the

1 list of the surnames; is that true?

2 A. True.

3 Q. And this is the same Abdihakim Ahmed who is now sending
4 an email with these ASA, with the ASA information to claims
5 at Feeding Our Future; is that true?

6 A. Yes.

7 Q. Salim Said is nowhere on this email; is that correct?

8 A. He is not on this email. He did receive the email two
9 days before in a very similar format.

10 Q. Okay. That's not my question.

11 A. Okay.

12 Q. He received the email, correct?

13 A. Correct.

14 Q. He did not send the email to claims; is that true?

15 A. True.

16 Q. And the email that he received, which you just testified
17 to, was after Faaris Studio and Abdihakim Ahmed had already
18 been discussing the roster, true?

19 A. True.

20 Q. Thank you.

21 MR. MONTEZ: No further questions.

22 THE COURT: Mr. Ebert.

23 MR. EBERT: Thank you, Your Honor.

24

25

REDIRECT EXAMINATION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

BY MR. EBERT:

Q. All right. Good morning, Special Agent Parks.

A. Good morning, Mr. Ebert.

Q. You were asked a few moments ago by counsel for Ms. Bock about whether some of the student names may have gone to a school that was not a public school.

Do you remember that?

A. Yes.

Q. So taking a look at Exhibit LL10, given your work on this investigation, do you have any reason to believe that a supposed kid by the name of Amen Love went to a private school?

A. I don't believe these are real names, so no.

Q. Why? Why is that?

A. They're very unusual names. Amen, Praise and Blessings all in one family, all with the last name of Love and all with different ages at different sites and different times.

Q. And what about the repeated references to a child of differing ages named Putify Nop.

Do you remember that?

A. I do remember that, yes.

Q. Any reason to believe that's a real kid?

A. No. I don't think it's a real kid.

Q. I'm sorry.

1 A. I don't think that's a real kid at all.

2 Q. I take it then no reason to believe that's a kid that is
3 home-schooled?

4 A. No.

5 Q. Any reason to believe that's a child who went to a
6 private school?

7 A. I don't believe that.

8 Q. Or an undocumented child?

9 A. No.

10 Q. And these are just but a few examples of some of these
11 ludicrous names, right?

12 A. Yes. If I recall, there's also a Mopey Nop in some of
13 the records. I also believe that's another example of a
14 fake name, so Putify and Mopey.

15 Q. Now, you were also asked about, some questions about
16 Feeding Our Future and Ms. Aimee Bock's role with respect to
17 those rosters.

18 Do you remember that?

19 A. Yes.

20 Q. Did Aimee Bock collect rosters?

21 A. Yes.

22 Q. Can you explain?

23 A. Aimee Bock received rosters in emails. Aimee Bock's
24 organization, Feeding Our Future, received rosters in
25 emails. Aimee Bock's employees received these rosters in

1 emails, and we found rosters in the search warrants
2 conducted.

3 So certainly these rosters were collected by Aimee
4 Bock.

5 Q. And approximately how many pages do you estimate of
6 these rosters were received and collected by Aimee Bock?

7 A. It would be in the thousands.

8 Q. And you've reviewed many of those; is that right?

9 A. Yes.

10 Q. How long did it take you to realize those rosters had
11 fake kids' names?

12 A. The first, the first roster that I opened I didn't
13 believe it to be true.

14 Q. Why not?

15 A. The names were ridiculous. You could just tell by
16 looking through the names, I didn't believe them to be true
17 at all.

18 Q. And on the subject of these questions you were asked
19 about Feeding Our Future's role in rosters, are you aware of
20 whether or not Feeding Our Future itself had its own sites?

21 A. Yes.

22 Q. And with respect to Feeding Our Future sites, did they
23 have a role with respect to rosters?

24 A. Yes.

25 Q. On the left is an example of these rosters; is that

1 correct?

2 A. Yes.

3 Q. This is the Feeding Our Future, Taylor site in
4 Minneapolis?

5 A. Yes.

6 Q. And on the right, is this a portion of a roster
7 submitted for the Southside Youth site name?

8 A. Yes.

9 Q. The jury may recall. This is the site where video
10 surveillance was done on the graffiti building.

11 A. Yes.

12 Q. Are you aware of that location?

13 A. Yes.

14 Q. These are rosters, are they not?

15 A. These are, yes.

16 Q. For a Feeding Our Future maintained site, correct?

17 A. Correct.

18 Q. Submitted at the exact same time of November 2021?

19 A. Correct.

20 Q. Both maintained in the physical files of Aimee Bock's
21 Feeding Our Future; is that right?

22 A. Yes.

23 Q. And these contain duplicate children's names; is that
24 right?

25 A. Let me review for one second here.

1 Q. Directing your attention to the top of the left and the
2 bottom of the right.

3 A. Yes.

4 Q. Multiple names of supposed children being claimed by
5 Aimee Bock's Feeding Our Future at its own sites, correct?

6 A. Correct.

7 MR. EBERT: Thank you. I have no further
8 questions, Your Honor.

9 THE COURT: Mr. Udoibok.

10 MR. UDOIBOK: Thank you.

11 RECROSS-EXAMINATION

12 BY MR. UDOIBOK:

13 Q. Ms. Mallet, would you call up LL10, please.

14 You testified about LL10 just a few minutes ago,
15 correct?

16 A. Yes.

17 Q. Ms. Bock did not send this email to anyone, did she?

18 A. Not these emails on this exhibit.

19 Q. Okay. Now, let's go to --

20 Ms. Bock, are you able to call up P66 and P77 side
21 by side? Just go through. There you go. There you go.

22 Now, you testified that this is a Feeding Our
23 Future site, correct?

24 A. That's my understanding, yes.

25 Q. All right. And call out 77 also. I think, what page is

1 that? Scroll down a bit. There you go.

2 All right. So, but -- do you have any evidence
3 that Ms. Bock created this roster?

4 MR. EBERT: Object to the form of the question.
5 Beyond his personal knowledge.

6 THE COURT: Sustained.

7 BY MR. UDOIBOK:

8 Q. All right. Did Ms. Bock create this roster?

9 A. I don't know who created this roster.

10 MR. UDOIBOK: No further questions.

11 THE COURT: Mr. Montez.

12 MR. MONTEZ: Nothing further, Your Honor.

13 THE COURT: Mr. Ebert.

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

15 THE COURT: Special Agent Parks, you may step
16 down. Thank you.

17 THE WITNESS: Thank you.

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

20 MR. BOBIER: Thank you, Your Honor. The
21 government calls Mohamed Hussein.

22 THE COURT: Good morning, sir. I will have you
23 come forward to me up here. It's me. Hi. You are going to
24 come all the way up here, and then you will stand before me
25 to take the oath first.

1 THE WITNESS: Yes.

2 MOHAMED HUSSEIN,

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

5 THE WITNESS: Yes, I will tell the truth.

6 THE COURT: All right. Thank you. You may sit
7 down.

8 THE WITNESS: Thanks, Your Honor.

9 THE COURT: And, sir, when you are settled, can
10 you state and spell both your first and last name for the
11 record?

12 THE WITNESS: My name is Mohamed Hussein.

13 THE COURT: Can you speaking both of them.

14 THE WITNESS: Mohamed, M-O-H-A-M-E-D. Last name
15 Hussein, H-U-S-S-E-I-N.

16 THE COURT: Thank you our court reporter is taking
17 down what you say so I will ask you to speak slowly and not
18 speak over Mr. Bobier who is going to ask you questions.

19 THE WITNESS: Observation Your Honor.

20 THE COURT: You may inquire Mr. Bobier.

21 MR. BOBIER: Thank you, Your Honor.

22 DIRECT EXAMINATION

23 BY MR. BOBIER:

24 Q. Hello, Mr. Hussein. How are you?

25 A. Good.

1 Q. Could you tell us how old you are?

2 A. How old I am?

3 Q. Yes.

4 A. I was born October 15, 1969.

5 Q. And where were you born in 1969?

6 A. I was born in Somalia, Mogadishu.

7 Q. Is that where you grew up?

8 A. That where I grew up, yes.

9 Q. How long were you in Mogadishu?

10 A. I was -- since we have civil war.

11 Q. There was a civil war?

12 A. In, yes, 1991. And then I was there since I was born

13 1969 until 1991, and then I flee. I left the country, and I

14 went to Kenya, Nairobi.

15 Q. To Kenya?

16 A. To Kenya, Nairobi.

17 Q. So you fled the civil war, went to Nairobi.

18 A. Yes.

19 Q. How long were you in Kenya?

20 A. In two months.

21 Q. Just two months?

22 A. Yes, and I went to Cairo, Egypt.

23 Q. To Egypt next?

24 A. Egypt next.

25 Q. How long did you live in Egypt?

1 A. I was approximately eight years. I left 1998.

2 Q. In 1998 --

3 A. Yes.

4 Q. -- where did you go after you left?

5 A. I went Australia.

6 Q. Australia?

7 A. Yes, and I came here in 1999.

8 Q. You came to the U.S. for the first time --

9 A. Yes.

10 Q. -- 1999?

11 A. 1999, correct.

12 Q. When you first moved to the U.S., what state did you
13 live in?

14 A. Virginia.

15 Q. Where in Virginia?

16 A. North Virginia.

17 Q. Okay.

18 A. It's Hudson Parkway.

19 Q. Oh, how long were you in North Virginia?

20 A. I was in 1999 to 2001. I move to Minnesota 2001.

21 Q. Why did you move to Minnesota in 2001?

22 A. Initially my wife she have a friend in, in Minnesota,
23 Owatonna, and she, she did community. She called her
24 friends. She said you are here, come, you know, it's good.
25 And then we moved because of my wife.

1 Q. Be closer to family friends?

2 A. Close to family and friends.

3 Q. So you said Owatonna; is that right?

4 A. Owatonna, yes.

5 Q. Is that where you and your wife lived in Minnesota?

6 A. Yes.

7 Q. And do you still live in Owatonna?

8 A. No. We move to Faribault.

9 Q. And Faribault, Minnesota, is where you live with your
10 wife today?

11 A. Yes.

12 Q. So after you came to the United States and you were
13 first living in Virginia, what did you do for work?

14 A. In Virginia?

15 Q. Yeah.

16 A. I was, I work at the gas station first when I came. I
17 been, I been working at the gas station, and then I change
18 my work and taxi driver. I became taxi driver before I move
19 to Minnesota, Owatonna.

20 Q. What work did you do in Owatonna?

21 A. Owatonna, I was, when I moved to Owatonna I start
22 working at Jennie-O Turkey Store in Faribault.

23 Q. The Jennie-O Turkey factory?

24 A. Jennie-O Turkey factory. I commute for the work when I
25 was living in Owatonna.

1 Q. Bit of a commute?

2 A. Bit of a commute to Faribault.

3 Q. Okay. What did you do after you worked at Jennie-O?

4 A. Jennie-O, and then I, after that I, I start college and
5 Faribault Community College to build my English and then I
6 study over there.

7 And then after that I became, I start working. I
8 quit the job. I start working at the high school. I
9 interpret in Waseca.

10 Q. In Waseca?

11 A. Yes.

12 Q. You worked at a high school?

13 A. And then, and then I stopped working at Waseca,
14 interpret at Waseca. I start working at Faribault High
15 School as a cultural liaison.

16 Q. What did you do as a cultural liaison at the Faribault
17 High School?

18 A. I was bridging families, student with the family and the
19 teachers and the principal. I communicate with them.

20 Q. Because -- with Somali families?

21 A. With Somali families, yes.

22 Q. Because you had been working on your English, right?

23 A. Yes, I was working my English, and my English start to
24 grow.

25 Q. Your English was growing?

1 A. Yes. My English start growing, and then they hire me as
2 a cultural liaison to help the people. The family don't
3 speak English that much. I was bridging between them.

4 Q. You were a bridge?

5 A. I was a bridge.

6 Q. What did you do after serving as a cultural liaison at
7 the high school?

8 A. And then, and then after, after I was working there, I,
9 I start working social, call it. I switch my work, social
10 at the college. I become adviser at the college.

11 Q. Adviser at the college?

12 A. At the college.

13 Q. And what were you doing as an adviser?

14 A. I was advising students to have classes on what they
15 need. If they tell me we need business management, I will
16 direct them to, you know, how many classes and what classes
17 they going to take. I was advising them.

18 Q. Okay. Now, at some point, Mr. Hussein, did you found a
19 nonprofit of your own?

20 A. Yes. While I was working at the high school, I, I
21 initiated 2009 Somali American Faribault 4education.

22 Q. The Somali American Faribault Education?

23 A. Education, yes. While I was working at the high school,
24 I initiated that because of the need of the student who
25 needs help for math and science. I talk to, I talk to the

1 principal, and I said is there any way I can get room to
2 help the student who needs help for math and science.

3 And then he give me a room. The principal give me
4 a room. And then I was helping them, and then I was helping
5 them -- I was using the teachers to help them, you know, to
6 help for homework.

7 Q. Got it.

8 A. Yes.

9 Q. So your organization, it was called SAFE; is that right?

10 A. Yes. You can, you brief it. It's called SAFE.

11 Q. Somali American --

12 A. Faribault Education.

13 Q. Okay. And you started that in 2009?

14 A. 2009.

15 Q. As a nonprofit?

16 A. As a nonprofit.

17 Q. Okay. Mr. Hussein, we'll talk about that. A few
18 minutes ago you said you live in Faribault with your wife.

19 A. Yes.

20 Q. What's your wife's name?

21 A. My wife's name is Lul Ali.

22 Q. Earlier in the trial, the jury heard testimony from Lul
23 Ali. Was that your wife?

24 A. Yes. She's my wife, yes.

25 Q. You weren't in the courtroom when she testified, right?

1 A. No, I wasn't. It's cultural, yes. No.

2 Q. But you know that she came here and told the jury all
3 about herself; is that right?

4 A. Yes.

5 Q. At some point your wife opens a restaurant; is that
6 right?

7 A. Yes, she opened restaurant called Lido.

8 Q. Lido, and the jury heard a lot about that?

9 A. Yes.

10 Q. Lido Restaurant, which was in Faribault?

11 A. Yes. It's in Faribault, yes.

12 Q. That's a Somali food restaurant?

13 A. Somali food restaurant.

14 Q. Ms. Ali told us it's not a very big restaurant.

15 A. It's not very big restaurant, approximately nine chairs
16 something.

17 Q. Nine places to sit, maybe?

18 A. Nine places to sit, yes. It's not much.

19 Q. Okay. Now, Mr. Hussein, at some point did you and your
20 wife get involved with the federal food program?

21 A. Yes.

22 Q. Including with Feeding Our Future?

23 A. Yes.

24 Q. And that began with your wife's restaurant Lido?

25 A. Yes.

1 Q. In Faribault?

2 A. Yes.

3 Q. How did you and your wife first get involved?

4 A. Basically what you called a guy, his name is Shafi came
5 to my wife at the restaurant, Lido, telling her -- I was
6 there with her -- telling her I have opportunity for you and
7 you giving food for the kids.

8 The program called Feeding Our Future is going to
9 give you opportunity. If you want, I can give you the
10 application and then, and then if -- she said, okay, that's
11 fine.

12 Q. So, Mr. Hussein, I want to ask you a lot about that
13 opportunity that Shafi from Feeding Our Future --

14 A. Yes.

15 Q. -- told you and your wife about.

16 A. Yes.

17 Q. But before I do, was it your and your wife's involvement
18 with Feeding Our Future that ultimately brought you here to
19 testify today?

20 A. Yes.

21 Q. Were you and your wife both charged with federal crimes
22 arising from your participation --

23 A. Yes.

24 Q. -- with Feeding Our Future?

25 A. Yes.

1 Q. What were you charged with doing?

2 A. It's a fraud.

3 Q. How is it fraud?

4 A. Fraud. It's, when you doing, when you doing carryout,
5 you know, we did for money involvement.

6 Q. What do you mean, "For money involvement"?

7 A. It's -- when Feeding Our Future sponsor -- giving sites
8 for my wife, and she was using the money inappropriate, and
9 the money wasn't right, you know. The invoices were
10 inflated, and the, the foods, the count meals were for the
11 kids was not right.

12 Q. The invoices were inflated?

13 A. The invoices were inflated.

14 Q. And the counts --

15 A. The counts, meal.

16 Q. -- were not right?

17 A. Were not right.

18 Q. And that's why you were charged with a crime?

19 A. With the crime, yes.

20 Q. Mr. Hussein, did you plead guilty?

21 A. I plead guilty, yes.

22 Q. And why are you here today?

23 A. Tell the truth.

24 Q. Tell the truth?

25 A. Yes.

1 Q. Back in 2022, some law enforcement agents from the FBI,
2 they came to talk to you.

3 Do you remember that?

4 A. Yes. There were several agent, agencies.

5 Q. Several agents from several agencies?

6 A. Several. Several people came, yes.

7 Q. They all came to talk to you?

8 A. Yes.

9 Q. Was that scarry?

10 A. I was scarred. First time in my life.

11 Q. The first time in your life you were that scared?

12 A. Yes. I face FBI.

13 Q. And when you were facing the FBI back in 2022, did you
14 tell them everything you knew about Feeding Our Future and
15 your involvement?

16 A. No, I wasn't tell everything I knew for involvement.

17 Q. You weren't fully forthcoming?

18 A. No. I was scared.

19 Q. You were scared?

20 A. Yes.

21 Q. But after that meeting, at some point you got a lawyer,
22 right?

23 A. Yes, I got a lawyer after that.

24 Q. And you are here to testify today?

25 A. Yes.

1 Q. And what are you going to do today?

2 A. Telling the truth.

3 Q. Mr. Hussein, have you been sentenced yet?

4 A. No.

5 Q. Do you know what sentence you will get?

6 A. I don't know.

7 Q. Have you and I ever discussed what sentence you might
8 get?

9 A. You and me?

10 Q. Yeah. Have we ever talked about that?

11 A. No.

12 Q. Has anyone from the government made any promises to
13 you --

14 A. No.

15 Q. -- about --

16 A. No.

17 Q. -- the sentence you will get?

18 A. No. Never.

19 Q. Who decides what sentence you will get?

20 A. Your Honor, the judge.

21 Q. Judge Brasel?

22 A. Judge Brasel, yes.

23 Q. She's the only one?

24 A. She's the only one.

25 Q. Do you hope that later, when Judge Brasel sentences you,

1 that she will consider you coming and testifying here today?

2 A. She knew that I was coming?

3 Q. Do you hope that when she sentences you, she will take
4 into account --

5 A. Yes.

6 Q. -- she will think about?

7 A. Yes.

8 Q. That you've come here?

9 A. Yes.

10 Q. You hope you might get a break?

11 A. I hope what?

12 Q. You hope she might give you a better sentence because
13 you are here?

14 A. I don't know about that. I hope I have, I hope for,
15 what do you call, I'm hoping good sentencing.

16 Q. You are hoping, but that's up to the judge?

17 A. That's up to the -- I hope lenience.

18 Q. Leniency.

19 All right. Mr. Hussein, let me talk to you a
20 little bit more about how you and your wife, Ms. Lul Ali,
21 got involved with Feeding Our Future. Okay?

22 A. Yes.

23 Q. When we left off, you said that a man named Shafi came
24 to meet you and your wife from Feeding Our Future and
25 mentioned an opportunity; is that right?

1 A. Yes.

2 Q. What did Shafi say?

3 A. Shafi said if you want, I have opportunity for you guys
4 and for you feeding the kids meal. It's going to be \$4
5 something. He said I will then explain it to her.

6 Q. \$4 per meal?

7 A. Per meal. 4.50 per meal, but you're going to make a lot
8 of money. And then, and then she said, okay, and that's
9 fine.

10 And then he called Aimee on FaceTiming right away.
11 He said I have new client.

12 Q. Shafi?

13 A. Shafi did.

14 Q. You held up your hand. You are saying Shafi FaceTimed?

15 A. Yes.

16 Q. Aimee Bock?

17 A. Aimee Bock. And then he said I have new client in
18 Faribault. And then, and then she said it's fine. And then
19 fill out the form, bring to me. And then he fill out the
20 form, and then he took the form to her.

21 Q. Okay. So Shafi comes to meet you and your wife, right?

22 A. Yes.

23 Q. And he FaceTimes Aimee Bock while you were there?

24 A. Yes, I was there.

25 Q. He says we have a new client for the program.

1 A. Yes.

2 Q. She says fine.

3 A. Yes.

4 Q. And then Shafi fills out the application?

5 A. While she was on FaceTiming too.

6 Q. While Ms. Bock was still FaceTiming?

7 A. Yes.

8 Q. And Shafi leaves with that application.

9 A. Yes.

10 Q. Okay. When was the next time someone from Feeding Our
11 Future came to visit you and Ms. Lul Ali?

12 A. Shafi called next day, my wife. He called my wife,
13 saying you application approved. And then he brought
14 Eidleh.

15 Q. Mr. Eidleh?

16 A. Mr. Eidleh. He brought him into the restaurant, saying
17 this guy's going to work with you. I will not work for you
18 anymore. This guy's going to work with you. And then he
19 introduce to her, and they get to know, and then they left.

20 Q. Okay. So Mr. Shafi comes back.

21 A. Yes.

22 Q. With Mr. Eidleh.

23 A. With Mr. Eidleh.

24 Q. He introduces you and your wife to Mr. Eidleh.

25 A. Yes.

1 Q. And says this is your new guy, right?

2 A. The new guy, yes, you guys will work together.

3 Q. Okay.

4 A. He says, and then they left.

5 Q. And they left?

6 A. Yes.

7 Q. So after that, Mr. Hussein, did you and your wife start
8 participating in the program under Feeding Our Future at
9 Lido Restaurant?

10 A. Yes.

11 Q. How did you do that?

12 A. The next day, the following day, Eidleh came with the,
13 with the count meal and paper.

14 Q. The paperwork?

15 A. Yes, meal count sheet, and then with a clicker and with
16 clicker, one clicker for her. And then, and then he
17 explained to her this is, this is, this is how, this is how
18 you going, you going to do the application.

19 He called her right away. He say, I am here with
20 Lul. I am here with Lul. And then I'm showing her how to
21 do the count meal sheet.

22 Q. Let me pause you. You said he called her right away.

23 Who called who?

24 A. Mr. Eidleh called Aimee.

25 Q. Aimee Bock?

1 A. Yes.

2 Q. Was that FaceTime again?

3 A. FaceTiming again. Yes. I don't see her ever talking to
4 phone. I was seeing her with Eidleh FaceTiming all the
5 time.

6 Q. You saw that all the time?

7 A. When he comes to us.

8 Q. When he came to Lido Restaurant?

9 A. When he comes to Lido Restaurant.

10 Q. To talk to you about how to participate in the food
11 program?

12 A. How to participate in the food program.

13 Q. So in that meeting you were just describing where
14 Mr. Eidleh comes --

15 A. Yes.

16 Q. -- with the paperwork you said?

17 A. Yes, meal counts.

18 Q. Let me show you on your screen. Is this the kind of
19 paperwork --

20 A. Yes.

21 Q. -- you were talking about, Mr. Hussein?

22 A. Yes, yes.

23 Q. This is government's Q41, which is in evidence.

24 All right. So at this meeting, Mr. Eidleh comes
25 back. He's FaceTiming Aimee Bock, and he has paperwork that

1 looks like this?

2 A. Yes.

3 Q. What does Mr. Eidleh and Ms. Bock explain to you and
4 your wife about how to use this paperwork?

5 A. When he explain to her how to do, and then he called
6 her, and she said did Eidleh explain to you. She said, yes,
7 he explained to me. And then he, and then she was
8 FaceTiming with Eidleh.

9 And then Lul starts doing 1,000 meal every day.

10 Q. Who said do 1,000 meals every day?

11 A. Aimee.

12 Q. Aimee Bock?

13 A. Yes.

14 Q. On FaceTime?

15 A. On FaceTime.

16 Q. While you were standing there listening to it?

17 A. Yes. I was there with my wife. All the time I was
18 helping the restaurant.

19 Q. All the time you were there?

20 A. Yes, from the morning I was there.

21 Q. What did you understand Aimee Bock to be telling you to
22 do when she said every day do 1,000 on this sheet?

23 A. 1,000 every day for the kids, you giving food for the
24 kids. I give you this 1,000 every meal count for 1,000
25 every day. I give you. She was explaining, Lul, I give you

1 1,000 meal every day to feed the future, to give the kids.

2 Q. When you say Aimee Bock said, "I will give you 1,000,"
3 do you mean Aimee Bock was saying she would give you 1,000
4 actual meals to hand out?

5 A. No.

6 Q. What do you mean?

7 A. She said make, when you doing the meal counts, write
8 down 1,000, you provide foods for 1,000 kids every day.

9 Q. Write that down?

10 A. Write that down in the meal counts. That's what she was
11 meaning.

12 And then, and then she instructed how it works.

13 Q. How did it work, according to Aimee Bock?

14 A. She was saying, if you do 1,000 meal every day, you are
15 going to get more money. You are going to get big check.
16 You are going to benefit. I remember was saying you living
17 American life.

18 Q. American life?

19 A. Yes. She was saying, I remember she was saying American
20 dream. American dream. That's how she was using, American
21 dream.

22 And then she was, she was explaining, saying every
23 day you do meal count 1000, and then, and then send it to me
24 through email. When you do the meal count and the invoices,
25 you do the invoices, send it to me through email.

1 And we were doing that.

2 Q. Let me pause and ask you something. Do you see the
3 document that's still up on your screen there? It's page 4
4 of Q41.

5 Do you see that?

6 A. Yes.

7 Q. You and your wife submitted a lot of these meal counts
8 from Lido Restaurant, right?

9 A. Yes.

10 Q. Mr. Hussein, were you and your wife really feeding 1,000
11 meals to children every day like this meal count says?

12 A. Not even close. No. Believe me. I'm here to tell the
13 truth. I don't, I don't -- we never feed 1,000 kids meal,
14 ever.

15 Q. Do you think you could have fed a thousand kids a day
16 out of the small restaurant with nine tables in it?

17 A. No.

18 Q. Even close?

19 A. Not even close.

20 Q. Why did you write down with your wife 1,000 meals a day
21 if you weren't feeding that many kids?

22 A. She trained. She trained us. We have to listen to her.

23 Q. Aimee Bock trained you?

24 A. Aimee. Aimee, we have to listen because she's running
25 the program, and then we have to listen to her. That's why

1 she always saying, you know, do this, do this, do the
2 clicker.

3 And then if you do the clicker every day for 1,000
4 meal, I have the system, she tells me, in my office if you
5 do, if you click it.

6 Q. You are holding your hand up and moving your thumb up
7 and down?

8 A. Like that.

9 Q. Sort of clicking one of those little mechanical
10 counters; is that right?

11 A. Yes, yes.

12 Q. And what did Aimee Bock tell but how that counter
13 worked?

14 A. Like you clicking (indicating), you clicking like that,
15 and then it's going to -- I have a system in my office is
16 going to tell me when you done 1,000.

17 Q. Now, to be clear, Mr. Hussein, you weren't really
18 feeding a thousand kids with your wife every day at Lido
19 Restaurant?

20 A. No.

21 Q. Ever, right?

22 A. We never feed 1,000 meals every day. Never.

23 Q. Do you know if Aimee Bock knew?

24 A. She knew.

25 Q. Why?

1 A. Because, when, when, she could have come to the, the
2 restaurant and, and checked us, saying what you doing. She
3 was, she was monitoring us. She knew that this money coming
4 from the government was lies because the doctors and the
5 lawyers, she knew they don't make \$200,000 check.

6 Q. Even doctors and lawyers don't get \$200,000 checks?

7 A. They don't get \$200. And she knew that this is lie.

8 Q. But you were getting \$200,000 checks, weren't you?

9 A. Yes.

10 Q. You and your wife?

11 A. Me and my wife, yes.

12 Q. Checks from Feeding Our Future?

13 A. Yes. 30,000, 30,000 cash, and we giving her back.

14 Q. Let me ask you about that part. Was there a time when
15 someone from Feeding Our Future explained to you fees that
16 you would need to pay to be in the food program?

17 A. Yes.

18 Q. Tell us about that.

19 A. It's when Eidleh come. He said let me explain to you
20 how Aimee works.

21 Q. And when Mr. Eidleh comes to you and your wife and says
22 let me explain to you --

23 A. Yes.

24 Q. -- how Ms. Bock works?

25 A. Yes, he called her.

1 Q. He called her on FaceTime?

2 A. FaceTiming, along with her he explained to us.

3 Q. What did he and Ms. Bock explain?

4 A. He say we, we be, you pay 30,000 cash. And then before
5 the check comes, we cut 15 percent, and then that's how I
6 work, she said.

7 Q. That's how I work, Ms. Bock said?

8 A. Yes, yes. Are you accepting, she said. My wife said
9 yes. I was there.

10 And then, and then he, he comes every month. When
11 the check come, he comes every month and get the \$30,000,
12 and he called her saying, I have 30,000, 30,000 cash in my
13 hand. He called her all the time in FaceTiming.

14 Q. You would see that?

15 A. I seen that.

16 Q. When Mr. Eidleh would come --

17 A. Yes.

18 Q. -- to your wife's restaurant --

19 A. Yes.

20 Q. -- where you were running a Feeding Our Future site --

21 A. Yes.

22 Q. -- and he would take \$30,000 in cash from you --

23 A. Yes.

24 Q. -- every month?

25 A. Every month when the check comes.

1 Q. When Eidleh would come and pick up the \$30,000 payments
2 every month from you and your wife, he would FaceTime Aimee
3 Bock?

4 A. He called. He called FaceTiming Aimee, and then he say
5 I have the money in my hand.

6 Q. I have it in my hand.

7 A. In my hand. He always say, I have the money. Lul give
8 it to me in my hand, and then, and then she said thank you.
9 Lul, you doing good. I get the meal count paper. I
10 received it. You did really good.

11 And then, and then he took the money.

12 Q. Ms. Bock would say, I got your paperwork?

13 A. I got your paperwork.

14 Q. I got your meal count?

15 A. The meal count.

16 Q. Good job?

17 A. You doing good job. And then he took the money in cash.

18 Q. In cash?

19 A. Yes.

20 Q. I want to ask you about something you said a little
21 earlier. You mentioned 15 percent.

22 A. 15 percent from the, from the -- before the check comes,
23 she kept, before the check comes, and she was explaining.
24 She's using in the office.

25 Q. What does that mean? What did Aimee Bock explain about

1 the 15 percent?

2 A. The office, the office services she said. The office
3 services.

4 Q. So each month?

5 A. Each month.

6 Q. You and your wife get a check from Feeding Our Future
7 for the false meal counts you were submitting?

8 A. Yes.

9 Q. But before you got that check, Ms. Bock explained, she
10 would take 15 percent out and keep that money for Feeding
11 Our Future?

12 A. Yes.

13 Q. But then after you and Ms. Ali got the check, got what
14 was left, still, you needed to give her \$30,000?

15 A. Yes. When the check comes, she knows the check comes,
16 and then Eidleh come right away, come after we have -- after
17 we receive the check, Eidleh come, and then he take the
18 money.

19 He called her saying I'm here first. I'm with
20 Lul. I'm with Lido Restaurant, and then he say I -- we give
21 the money, say I have the money and then 30,000 in my hand.
22 That's what he was using.

23 Q. In my hand?

24 A. Yes.

25 Q. Now, Mr. Hussein, you also, you and your wife, sometimes

1 wrote checks to Mr. Eidleh; is that right?

2 A. Yes.

3 Q. Why did you write checks to Mr. Eidleh?

4 A. SAFE is nonprofit organization. You can't get cash.
5 You can write a check. He said, he said July, August,
6 September, October, November, I think he took four checks
7 from SAFE one time.

8 Q. All at once?

9 A. All at once.

10 Q. So when you would pay Mr. Eidleh --

11 A. He call.

12 Q. -- from SAFE --

13 A. Yes.

14 Q. -- the nonprofit you started back in 2009 --

15 A. Yes, yes.

16 Q. -- you had to use checks?

17 A. Yes. And he called, he say I have four checks from
18 SAFE. He called Aimee, I have four checks from SAFE. And
19 then I said, why do you need one time. If you want to keep
20 it, give me the money or otherwise we terminate you. That's
21 what we, that's what he was saying in front of her.

22 And she said, she was on the line, and she said,
23 Mohamed, give the check one time for July, August,
24 September, October. I'm thinking. And November is the end
25 of the program. November we don't have any program anymore.

1 Q. When Mr. Eidleh came to you and he wanted four checks,
2 how much money was that all put together?

3 A. A hundred thousand.

4 Q. A hundred thousand dollars?

5 A. Yes.

6 Q. Give or take?

7 A. Approximately.

8 Q. And Mr. Eidleh, with Aimee on the FaceTime, said, give
9 me the checks or we will terminate you?

10 A. Yes, yes, yes.

11 Q. What did that mean to you, that they would terminate if
12 you didn't pay?

13 A. You don't get money anymore. The money you making, you
14 don't get anymore.

15 Q. You are out of the program?

16 A. You are out of the program.

17 Q. Can't run a site?

18 A. You can't run a site.

19 Q. Can't work with Feeding Our Future?

20 A. Yes.

21 Q. Pay?

22 A. Yes, pay.

23 Q. Or you are terminated?

24 A. Or you are terminated. You are not going to be anymore
25 for the program. She was saying that.

1 Q. And, Mr. Hussein, to be clear, all these payments we're
2 talking about, 30,000 in cash every month, the additional
3 checks to Mr. Eidleh?

4 A. 26, 50 some, 30 some. I divided four checks, 26
5 something.

6 Q. 26,000?

7 A. Something.

8 Q. 30,000?

9 A. 30,000 something, yes. Accumulation of maybe 1,000,
10 100.

11 Q. All of those payments that you made to Eidleh, to
12 Ms. Bock, why did you make those payments?

13 A. To keep the program open.

14 Q. Why did you want to keep the program open?

15 A. Because we were need the money. That was stupid thing
16 to take. That was stupid, because we were after the money.
17 She will train us. She was saying that, you know, she was
18 convincing us, you know. You are living the American dream.
19 You know, it's.

20 Don't buy cash, don't buy -- but the things she
21 was telling us, don't buy cars, don't buy houses, you know.
22 You become obvious. That's what she was saying.

23 Q. Aimee Bock?

24 A. And I had meeting, yes, with her in the office. A lot
25 of people were sitting in the office. I was there.

1 Q. I'll ask you about that office meeting in just a minute.

2 How much money were you and your wife making just
3 when Lido was running as a site? How much money were you
4 making?

5 A. A month?

6 Q. Yeah.

7 A. 200, 250, somewhere around 200.

8 Q. \$50,000, \$250,000?

9 A. Approximately 2,000 to -- yes, 200,000, 200, 250,000,
10 200.

11 Q. Based on what? Based on true meals given to kids?

12 A. No. It was false. We didn't give any foods to any
13 kids. Not even close 2,000 meals a day. 2,000, 1,000 meal
14 a day, we never give even, not close.

15 We were lying to the government, to be honest. It
16 was stupid mistake that I took along with her influence.

17 Q. Aimee Bock's influence?

18 A. Aimee influence.

19 THE COURT: Could I have a sidebar, please?

20 **(Sidebar discussion)**

21 THE COURT: Mr. Bobier, at a point --

22 MR. BOBIER: I'm sorry, Your Honor. Can you hear
23 me now?

24 THE COURT: I can. I was waiting for everybody to
25 be on.

1 MR. BOBIER: I apologize.

2 THE COURT: At a point in the next few minutes,
3 let's take a break.

4 Mr. Udoibok, I wanted to do this by sidebar, but
5 you are going to need to caution your client against her
6 facial expressions. That's been going on the entire trial.
7 I don't believe that this witness is intimidated by them,
8 but it certainly could be taken that way.

9 I can't have scoffing or laughing during
10 testimony. So at a break, I'd like you to caution her.

11 MR. BOBIER: Your Honor, I apologize for chiming
12 in, but just for the record, I had noticed the witness sort
13 of repeatedly glancing over at her as his answer is
14 interrupted.

15 So I appreciate the court's statement. I just
16 wanted to complete the record.

17 THE COURT: Okay.

18 Mr. Udoibok, you got it?

19 MR. UDOIBOK: Thank you.

20 THE COURT: Thank you.

21 **(In open court)**

22 THE COURT: Mr. Bobier, a few more questions, and
23 then we'll take our morning break.

24 MR. BOBIER: Thank you, Your Honor.

25

1 BY MR. BOBIER:

2 Q. Mr. Hussein, you gave checks to Eidleh, but you never
3 wrote checks to Aimee Bock; is that right?

4 A. Yes.

5 Q. Why is that?

6 A. Because she always hide from the people. That's what I
7 was thinking. He came to us. We were giving money to her.
8 He come, Eidleh comes to, to us. And being cash, 30,000, he
9 call FaceTiming all the time. That tells me that she's on
10 board.

11 Q. She's on board?

12 A. She's on board.

13 Q. And what do you mean you understood Aimee Bock was
14 hiding from the people?

15 A. When she doesn't communicate us, ever. She, she -- he
16 called her. He called her FaceTiming, talking to, you did
17 very good job. You did a very good job. I will work with
18 you many years to come. You did very good job.

19 She was resigning that -- she was convincing and
20 do more invoices, you will get more money, you know. That's
21 what she was always say that.

22 Q. More invoices, more money?

23 A. More invoices, more money.

24 Q. And does paying cash as opposed to paying a check, is
25 that easier to do the hiding you were talking about?

1 A. Yes, more easier to.

2 MR. UDOIBOK: Objection. Leading, Your Honor.

3 THE COURT: Wait a minute. I'm going to overrule
4 that objection and let the answer stand.

5 BY MR. BOBIER:

6 Q. Is it easier to do the hiding you are talking about --

7 A. Yes.

8 Q. -- with cash as opposed to a check?

9 A. Yes. The cash you cannot tell, you know, but the check,
10 if you write her name on the check, it become obvious.

11 That's why she didn't want that.

12 Q. And what she asked you for was cash?

13 A. Was cash, yes. She said, yes, she said I explained to
14 you how I work. She said, 30,000 every month, 15 percent
15 cut from the check before comes. Is the, you are going to
16 work with that, Lul? She said, yes.

17 Same thing as me when I get the site for SAFE.

18 Q. Those were the terms?

19 A. Yes.

20 MR. BOBIER: Your Honor, a good time to break.

21 THE COURT: We'll return at 10:50.

22 All rise for the jury.

23 Sir, I'm going to have you stand there for a
24 minute.

25 10:30 a.m.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

IN OPEN COURT

(JURY NOT PRESENT)

THE COURT: Thank you. We'll recess until 10:50.

Mr. Simmons, can you stay with your client during the break?

MR. SIMMONS: Yes, Your Honor.

THE COURT: Thank you.

(Recess taken at 10:30 a.m. till 10:52 a.m.)

10:52 a.m.

IN OPEN COURT

(JURY PRESENT)

THE COURT: You may all be seated.

And Mr. Bobier, you may continue.

MR. BOBIER: Thank you, Your Honor.

BY MR. BOBIER:

Q. Mr. Hussein, welcome back.

A. Thank you.

Q. There's some water there in front of you. If you want it, there's a pitcher and some cups. You can help yourself to it, if you want that.

A. Thanks.

Q. Mr. Hussein, before the break, we had talked a little bit about the money that you and your wife had paid to Mr. Eidleh, to Aimee Bock.

Do you remember that?

1 A. Yes.

2 Q. You mentioned a series of big checks that at some point
3 you provided Mr. Eidleh.

4 Do you remember that?

5 A. Yes.

6 Q. I'll show you Government's 62, W62, which is in
7 evidence.

8 These are bank records from SAFE. That's your
9 nonprofit; is that right?

10 A. Yes, yes.

11 Q. This is a big check in July of 2021; is that right?

12 A. Yes.

13 Q. About \$26,000?

14 A. Yes.

15 Q. Who is Bridge Logistics LLC, the recipient of this check
16 from you?

17 A. Eidleh said this Bridge Logistics, we, me and what you
18 called Aimee owned something, and then he says it's, it's,
19 it's real.

20 It wasn't, I think, real, saying it was not real,
21 I think.

22 Q. You didn't think Bridge Logistics was real?

23 A. No, I think it not real.

24 Q. But Eidleh told you that's how you pay Mr. Eidleh. You
25 write a check to Bridge Logistics?

1 A. Yes.

2 Q. This one's for 26,000; is that right?

3 A. Yes.

4 Q. You said you wrote a few of these. Here's another one
5 from June for another 26,000.

6 A. Yes.

7 Q. Two pages later on page 80, another one for another
8 26,000 to Bridge Logistics?

9 A. Yes.

10 Q. Are these the sorts of payments you were describing that
11 you made to Mr. Eidleh?

12 A. Yes.

13 Q. So that he and Ms. Bock wouldn't terminate you from the
14 program?

15 A. Yes. That's what I was talking, this accumulation,
16 hundred thousand, approximately, but I broke for 26
17 something, 24 something. I don't exactly remember, but I
18 break it up into. It was hundred thousand.

19 Q. To Eidleh?

20 A. To Eidleh, yes.

21 Q. And also the \$30,000 in cash you said you were paying to
22 Aimee Bock each month?

23 A. Yes.

24 Q. Mr. Hussein, did you think those payments you and your
25 wife were making to Ms. Bock, to Mr. Eidleh, did you think

1 those were legal?

2 A. No, it wasn't legal. It was, it was like kickback.

3 Q. A kickback?

4 A. Yes. No good. It's illegal in America.

5 Q. Should you have been doing that?

6 A. I was -- we were doing that because of the money we are
7 getting, was given to us.

8 Q. The money you were getting drove you to give the
9 kickbacks?

10 A. Yes.

11 Q. You wanted to keep getting all those big checks?

12 A. Yes.

13 Q. From Feeding Our Future?

14 A. Yes, yes.

15 Q. You wanted to keep participating in the program?

16 A. Yes.

17 Q. Under Aimee Bock?

18 A. Under Aimee Bock.

19 Q. So you paid her?

20 A. Yes. And she was needed to get the 30,000, 30,000,
21 30,000 every month.

22 Q. Every month?

23 A. Yes, that's what her goal is too.

24 Q. She told you that?

25 A. Yes.

1 Q. Now, Mr. Hussein, most of our conversation so far has
2 been about your wife's restaurant called Lido; is that
3 right?

4 A. Yes, yes.

5 Q. But you mentioned that at some point you opened a
6 different site under Feeding Our Future?

7 A. Yes.

8 Q. Under your preexisting nonprofit?

9 A. Yes.

10 Q. SAFE?

11 A. SAFE Somali American Faribault Education.

12 Q. Tell us why you opened another site under Feeding Our
13 Future using SAFE?

14 A. Initially she said --

15 Q. Who said?

16 A. Aimee called with Eidleh. He called. He said there
17 will be, cooked food will be ended very soon.

18 Q. The cooked food program?

19 A. Program will be ended very soon. And then if -- you
20 need to open a nonprofit organization. That's what she was
21 telling us.

22 Q. You need to open a nonprofit --

23 A. Yes.

24 Q. -- because the cooked food program --

25 A. Yes.

1 Q. -- which Lido was participating in --

2 A. Yes.

3 Q. -- was ending?

4 A. Was ended, yes.

5 Q. Okay.

6 A. And then she said, and then we, Lul said, Mohamed
7 already 503c nonprofit.

8 Q. You already had a nonprofit?

9 A. I already had a nonprofit organization.

10 Q. Because you had founded SAFE way back in 2009?

11 A. 2009.

12 Q. So Ms. Bock on FaceTime?

13 A. Yes.

14 Q. And Eidleh in person?

15 A. Yes.

16 Q. Tell you and your wife?

17 A. Yes.

18 Q. That you need a nonprofit. Why did you need a
19 nonprofit?

20 A. Why do I need?

21 Q. Why did you need a nonprofit? What were you going to
22 use it for?

23 A. Yes, I was helping the Somalia community.

24 Q. Back in 2009?

25 A. From 2009.

1 Q. But what did you do with that nonprofit with Feeding Our
2 Future?

3 A. Getting and feeding for the kids, that's what she said.
4 You know, you are going to feed kids. You can use that for
5 a kid, 2,000 every day. You are giving, you are giving food
6 every day 2,000 kids, kids for the meal.

7 And then, and then your source is going to end.
8 Lido is going to -- Lido, you are going to have nonprofit
9 another site because you are not going to stop the money
10 from getting Lido, and then you are going to get here. So
11 it's going to stop Lido.

12 Q. Okay. Let's break that down.

13 A. Yes.

14 Q. Ms. Bock and Eidleh tell you the program Lido was in,
15 the hot food program --

16 A. Yes.

17 Q. -- your understanding was that was ending?

18 A. Yes.

19 Q. Couldn't run that site at least for a while?

20 A. Yes.

21 Q. So they tell you you need a nonprofit to keep running a
22 site --

23 A. Yes.

24 Q. -- under Feeding Our Future?

25 A. Yes, for dry food.

1 Q. For dry food?

2 A. Yes.

3 Q. So Ms. Bock says, if you run a site under SAFE, you can
4 claim how many kids a day?

5 MR. UDOIBOK: Objection. Leading.

6 THE WITNESS: 20.

7 THE COURT: Overruled.

8 THE WITNESS: Two --

9 THE COURT: Go ahead. You may answer now.

10 BY MR. BOBIER:

11 Q. How many kids a day did Ms. Bock say?

12 A. First she said 2,000 kids a day. And then after while,
13 it went up. She said you can have, now you can have 2,500.
14 You can do it right now, she said.

15 Q. You can do it, she said?

16 A. Yes.

17 Q. Q131 is in evidence.

18 Now, Mr. Hussein did you do that? Did you open a
19 site using SAFE?

20 A. Yes.

21 Q. Under Feeding Our Future?

22 A. Yes.

23 Q. After that conversation with Ms. Bock and Mr. Eidleh?

24 A. Yes.

25 Q. And you started submitting claims, right?

1 A. Yes.

2 Q. Just like you'd been submitting claims with your wife at
3 the Lido Restaurant?

4 A. Yes.

5 Q. Here's an early claim from February of 2021 on page 3 of
6 this exhibit. Do you see that?

7 A. Yes.

8 Q. This is the Somali American Faribault Education. That's
9 SAFE?

10 A. Yes.

11 Q. Your nonprofit?

12 A. Yes.

13 Q. Monday, about 2,000 meals claimed to kids?

14 A. Yes.

15 Q. Tuesday, about 2,000 meals claimed to kids?

16 A. Yes.

17 Q. Wednesday, same thing? Another 2,000 meals claimed to
18 kids; is that right?

19 A. Yes.

20 Q. And just in this first week here, 12,000 meals. That's
21 the claim?

22 A. Yes.

23 Q. Did you submit that claim, you and your wife, to Feeding
24 Our Future?

25 A. No.

1 Q. Well --

2 A. We submitted.

3 Q. You did submit it?

4 A. We did submit to Aimee, email.

5 Q. Go up to page 1, the thing we are just looking at,

6 that's attached to an email from you, right?

7 A. Yes.

8 Q. Going to claims at Feeding Our Future?

9 A. Yes.

10 Q. So you submitted it?

11 A. Yes.

12 Q. So, Mr. Hussein, did you actually do that?

13 A. No.

14 Q. Did you feed 2,000 meals to kids --

15 A. No.

16 Q. -- every single day at SAFE?

17 A. No.

18 Q. Even close?

19 A. Not even close.

20 Q. Is that a good thing to do?

21 A. Huh?

22 Q. Was this a good thing --

23 A. No.

24 Q. -- to do?

25 A. It was not good. Lying to the government is no good.

1 Q. These are lies, right?

2 A. Lies.

3 Q. Why did you and your wife tell all of these lies on
4 these meal count sheets month after month after month? This
5 is all just February.

6 But for months you did this, right?

7 A. Yes, months. Ten months.

8 Q. Ten months?

9 A. Ten months.

10 Q. Why did you claim that many kids every day for ten
11 months?

12 A. To get the money.

13 Q. To get the money?

14 A. Get the money.

15 Q. You lied to get the money?

16 A. Huh?

17 Q. You lied to get the money?

18 A. Yes, lied to the government. No good. We were after
19 the money. We were, I was greedy. No good. That was
20 stupid to lie to the government.

21 Q. Let me show you another submission, Q133. That's in
22 evidence. That's another email from you. Do you see that?

23 A. Yes.

24 Q. To Feeding Our Future?

25 A. Yes.

1 Q. So, Mr. Hussein, I go down to page 15 of this
2 submission. For SAFE, we see that at the top, right?

3 A. Yes.

4 Q. Somali American Faribault Education?

5 A. Yes.

6 Q. What are we looking at here? What is this on page 15 of
7 this exhibit?

8 A. Where?

9 Q. In front of you, it says Banadir Restaurant and Grocery
10 on top. Do you see that?

11 A. Yes, yes. Banadir Restaurant existed.

12 Q. Exists? It's a real place?

13 A. Yes, but we created the invoice.

14 Q. You created this invoice?

15 A. Yes. It wasn't real.

16 Q. It wasn't real?

17 A. Yeah. No.

18 Q. This invoice from Banadir Restaurant claims to be 600
19 times 6 times 4, thousands and thousands of pounds of sugar;
20 is that right?

21 A. Yes.

22 Q. That's what it says?

23 A. That's what it says.

24 Q. \$12,000 for thousands and thousands of pounds of sugar?

25 A. Mm-hmm.

1 Q. That's not real?

2 A. That's not real.

3 Q. Why did you and your wife, Ms. Lull Ali, make, create
4 this fake invoice?

5 A. Aimee trained us saying that if you make more invoices,
6 you get more money.

7 Q. More invoices, more money?

8 A. More money. That's what she say.

9 Q. You've been submitting these claims, 2,000 kids a day,
10 2500 kids a day?

11 A. Yes.

12 Q. Those lies you told us about?

13 A. Yes. It was lies and false.

14 Q. Did you need to submit paperwork sometimes, invoices
15 with those claims?

16 A. Yes, you need to submit it to Aimee.

17 Q. Why do you have to submit the invoice with the claim?

18 A. To get the -- when she receive the invoices, you are
19 going to check the check.

20 Q. To get paid?

21 A. To get paid.

22 Q. You need the invoice to get paid?

23 A. Yes.

24 Q. So what did Ms. Bock explain to you about making
25 invoices?

1 A. If you, if you make, if you make, she said, you know,
2 there's a lot of Halal around in Faribault. If you create
3 it, the invoices more, you are going to get more checks.

4 Q. If you --

5 A. Yes. And then she was saying if you open more sites,
6 you will get more money. Why don't you open more sites for
7 your kids, she was saying. And we scare and we stopped. We
8 didn't do.

9 Q. More invoices, more money?

10 A. More invoices, more money. She was saying that.

11 Q. Now, Mr. Hussein, let me show you this in Government's
12 Q134, which is in evidence.

13 Now, this is an invoice, and I'll show you the
14 first page. The first page of this exhibit shows another
15 submission from you for SAFE going to Feeding Our Future.
16 Do you see that?

17 A. Yes.

18 Q. And on the 14th page here, this is also an invoice?

19 A. Yes.

20 Q. This is from Sysco?

21 A. Yes.

22 Q. Food provider?

23 A. Sysco, the big company.

24 Q. Big company?

25 A. Yes.

1 Q. Is this a real invoice?

2 A. This is the real invoice.

3 Q. This one is real?

4 A. Yes.

5 Q. And if we go down a couple of pages, we see this invoice
6 is for about \$7,000; is that right?

7 A. Yes, 325.

8 Q. Why didn't you get all of the invoices to support your
9 claims from Sysco?

10 A. Because the money is going to be short and the check
11 will be small.

12 Q. Why would the check be small if you get all of the
13 receipts that you need for the claims from Sysco?

14 A. Because if you -- the Sysco is going to be obvious.
15 Obvious means the government can see, and, you know,
16 everybody can see. But when you creating invoice by your
17 own, that's what she said, is good for you to have, to
18 create more invoices to get more checks.

19 Q. Because the invoice we looked at before, the thousands
20 of pounds of sugar, you didn't really buy that sugar, right?

21 A. No, we did not.

22 Q. You didn't really pay for it?

23 A. No, we did not pay.

24 Q. But after you submitted that fake sugar invoice --

25 A. Yes.

1 Q. -- Feeding Our Future paid you for it, right?

2 A. Pay us more, yes. Big check.

3 Q. Big check?

4 A. Yes.

5 Q. But if you submit real invoices from Sysco, real
6 invoices?

7 A. Yes, it was real invoices.

8 Q. Invoices for food you actually buy, the check you get
9 from Feeding Our Future is smaller?

10 A. Small.

11 Q. Not as much money?

12 A. Not as much money. That's why we have to add some of
13 the inflated invoices to create invoices to submit to her
14 and then get more checks.

15 Q. Better to do a fake invoice, right?

16 A. Yes.

17 Q. Where you are not spending any money on real sugar?

18 A. No.

19 Q. Not real food?

20 A. No, we never buy it.

21 Q. But you get paid for it.

22 A. We get paid for that, yes. Aimee was paying to us.

23 Q. And that's what Ms. Bock explained to you about the
24 invoices?

25 A. Yes. If you, if you, she said if you, more invoices,

1 you get more money. If you, you need to, you need to create
2 more invoices.

3 Q. Mr. Hussein, we've talked a bit about the Lido site.
4 We've talked a bit about the SAFE site. I want to ask you a
5 few things about vendors.

6 Did SAFE have a vendor in the food program under
7 Feeding Our Future?

8 A. Yes.

9 Q. What was the vendor for SAFE?

10 A. It was Lido.

11 Q. Lido, your wife's company?

12 A. Yes.

13 Q. The same company that had been operating as a fraudulent
14 site?

15 A. Yes.

16 Q. With those fake meal counts you described?

17 A. Yes. Me and my wife, we were there. Eidleh came. And
18 then he said, he said you can be a vendor. Aimee will give
19 you training. And he called Aimee, and she said, Lul, you
20 can be a vendor. I can give you training that you can get
21 license.

22 And then she give her training, bunch of people
23 not only my wife. And then she, she trained to get the,
24 what you call it, she telling how to get the license.

25 Q. And why use Lido, your wife's restaurant, as a vendor

- 1 for SAFE? Why do that?
- 2 A. To get money in to, to us.
- 3 Q. How did that work?
- 4 A. To, to give the money to Lido.
- 5 Q. To give the money to Lido?
- 6 A. To Lido, yes.
- 7 Q. Your wife's company?
- 8 A. Yes.
- 9 Q. So Q138, which is in evidence, at page 19, this is a
10 Lido invoice to you, to SAFE, right?
- 11 A. Yes.
- 12 Q. This is an invoice from your wife's restaurant --
- 13 A. Yes.
- 14 Q. -- to your company?
- 15 A. Yes.
- 16 Q. For a couple thousand pounds of goat meat?
- 17 A. Yes.
- 18 Q. And thousands and thousands of gallons of milk; is that
19 right?
- 20 A. Yes.
- 21 Q. For \$55,000?
- 22 A. Yes.
- 23 Q. Is that true?
- 24 A. No.
- 25 Q. Did Lido Restaurant give SAFE thousands and thousands of

1 gallons of milk to provide to kids?

2 A. No. Never.

3 Q. Never?

4 A. Not even close.

5 Q. You got paid for it?

6 A. Yes.

7 Q. Earlier, Mr. Hussein, you mentioned going to Feeding Our
8 Future's office. Do you remember doing that?

9 A. Yes.

10 Q. You described a meeting earlier, a meeting at the
11 office?

12 A. Yes.

13 Q. Tell us about that meeting.

14 A. We went to the office. It was Highway 8 I think,
15 Aimee's office. There were a lot of people where sites, we
16 had sites.

17 Q. A lot of people were at the meeting from sites?

18 A. Yes.

19 Q. Sites under Feeding Our Future?

20 A. Yes.

21 Q. Okay.

22 A. And then we went there, and then we were sitting, and she
23 was standing in front of us, Aimee.

24 Q. Ms. Bock was standing in front of you at the meeting?

25 A. Yes, yes, saying, you know, it's, you guys don't buy

1 cars, don't buy houses, kind of that and then -- something
2 like that.

3 Q. So at this meeting --

4 A. Yes.

5 Q. -- where you and other sites under --

6 A. Yes.

7 Q. -- Feeding Our Future --

8 A. Yes.

9 Q. -- had gathered --

10 A. Yes.

11 Q. -- at Aimee's office?

12 A. At Aimee's office.

13 Q. Aimee Bock says, don't buy cars?

14 A. Don't buy houses.

15 Q. Don't buy houses?

16 A. And then she was mentioning MDE. MDE was going to have
17 stopped this program, but I will fight them, and then I let
18 you know, guys.

19 And then one month, I think it was June, the
20 program stopped.

21 Q. MDE, that's the State?

22 A. The State.

23 Q. The government?

24 A. Yes.

25 Q. MDE, Ms. Bock explains, might stop the food program?

- 1 A. The food program.
- 2 Q. But Ms. Bock says she'll fight for it?
- 3 A. I will fight for it.
- 4 Q. Did you want her to fight for it?
- 5 A. Yes, at the time.
- 6 Q. Why at the time did you want her to fight for it?
- 7 A. The money. She showing the money. She's giving money
- 8 with lie, bunch of lie, and then I was needing the money.
- 9 Q. You wanted the money?
- 10 A. Yes.
- 11 Q. Didn't want the program to stop?
- 12 A. Yes. I don't want the program to stop. That's why.
- 13 Q. At the meeting she said don't buy houses, don't buy
- 14 cars?
- 15 A. Don't buy houses, don't buy cars, and, you know, you
- 16 guys need to know that. That's what she was advising,
- 17 advising the sites.
- 18 Q. Did Ms. Bock explain why she was advising all the sites
- 19 not to buy cars and not to buy houses?
- 20 A. Yes, little bit. She was obvious -- you become obvious,
- 21 people can see you easier.
- 22 Q. People can see you?
- 23 A. Easier.
- 24 Q. What would people see if --
- 25 A. People see easier that they can see that you have houses

1 or when you have cars already, and then it's not good.

2 Q. Why is it not good if the people running the sites for
3 Feeding Our Future become obvious with buying cars and
4 buying houses? Why is that not good?

5 A. Because you become, you become cautious where you get
6 the money, where you get the money, and then the government
7 will see you. That's why I interpret.

8 She was saying, you know, you guys need to know
9 don't buy cars, don't buy houses. That's what I'm telling
10 you.

11 Q. Your understanding was, you didn't want the government
12 to see the sites getting all that money, right?

13 A. Yes.

14 Q. Because you wanted the program to keep running?

15 A. Keep running, going.

16 Q. You wanted the money to keep coming?

17 A. Yes.

18 Q. Where did you get all that money? All the money you
19 were getting, where did you get it?

20 A. From Feeding Our Future, from Aimee's office.

21 Q. From the fake sites at Lido, right?

22 A. Fake sites at Lido.

23 Q. At SAFE?

24 A. From SAFE.

25 Q. What did you use all your money for, Mr. Hussein? What

1 did you spend it on?

2 A. Buy house, houses, two houses and good, one fancy cars.
3 And then cash to my daughter on them. She get injury. She
4 became lame.

5 Q. You bought --

6 A. She was in the hospital seven months. In the hospital
7 seven months, my daughter, and then the car lost. The house
8 the government took back.

9 Q. You bought two houses?

10 A. Yes.

11 Q. With the Feeding Our Future money?

12 A. Yes.

13 Q. Money you got from lying?

14 A. Lying, from lying.

15 Q. You bought some fancy cars?

16 A. Fancy cars and houses, very good houses.

17 Q. Very good houses?

18 A. Yes.

19 Q. You don't have that stuff anymore, do you?

20 A. I don't have that spot anymore.

21 Q. The government took it?

22 A. The government took it.

23 Q. You sent some money overseas, didn't you?

24 A. I sent it overseas.

25 Q. To family in Somalia?

1 A. In Somalia. My brother in the Netherlands.

2 Q. In the Netherlands too you sent money to?

3 A. Yes.

4 Q. Money you got from Feeding Our Future?

5 A. Yes.

6 Q. How much money did you get from Feeding Our Future in
7 the ten months you were running SAFE?

8 A. Approximately millions. Millions of dollars I think.

9 Q. Millions? And millions more from Lido?

10 A. Yes.

11 Q. Millions and millions of dollars in a year or two; is
12 that right?

13 A. What's that?

14 Q. Millions and millions of dollars in a matter of months?

15 A. Yes, in ten months.

16 Q. In ten months?

17 A. Yes. I make millions of dollars SAFE, and Lul makes
18 same from June 2020 until 2021 April. My wife restaurant,
19 she had the program 2020 June until 2021 April.

20 Q. Mr. Hussein, how do you feel now about having gotten all
21 of that money by lying to the government?

22 A. I was devastated. I feel bad, lying to the government.
23 It's not something you could do. American people, for
24 taxpayers, to get their money send it back home buying
25 houses, lying to the American people, it devastated me.

1 I was greedy. I'm sorry about that.

2 Q. You've been here in America for 20 years or more; is
3 that right?

4 A. Approximately 25, 26.

5 Q. Have you ever done anything like this before?

6 A. Say again?

7 Q. Have you ever gotten \$200,000 checks?

8 A. No, I never. I never.

9 Q. Before working with Feeding Our Future?

10 A. Only Feeding Our Future. I never had money for 200,000
11 a month ever my life.

12 Q. And, Mr. Hussein, now how do you feel having worked for
13 those months with Aimee Bock?

14 A. How do I feel?

15 Q. Yeah.

16 A. Aimee, it's -- I feel she ruined my life. She destroyed
17 me and my family, to be honest with you. She knew that.
18 And I knew even that was wrong amount of money, getting
19 200,000. I knew that was wrong.

20 I couldn't stop myself. I don't know why. The
21 money driven me, but I make big mistake. I, I became
22 greedy. I was greedy by all means.

23 Q. Thank you.

24 MR. BOBIER: Nothing further, Your Honor.

25 THE COURT: Mr. Udoibok.

1 MR. UDOIBOK: Thank you.

2 CROSS-EXAMINATION

3 BY MR. UDOIBOK:

4 Q. Mr. Hussein, my name is Kenneth Udoibok, and I represent
5 Aimee Bock. Okay. I have a few questions for you.

6 A. Okay.

7 Q. I want to understand your testimony here today.

8 First of all, just so I rap this around my head
9 clearly, you wouldn't have gotten involved in fraud, right?

10 A. Yes.

11 Q. If you had not met Ms. Bock, correct? Is that your
12 testimony?

13 A. I met one time in her office.

14 Q. You met her one time.

15 A. In her office.

16 Q. In her office after you had been part of the program,
17 right?

18 A. Yes, while I was in the program.

19 Q. All right. When did you start with Feeding Our Future?

20 A. When did I start?

21 Q. Yes.

22 A. Sometimes were 2000, 2000 -- 2021.

23 Q. 2021. All right. I'm not talking about when your wife
24 started. Okay?

25 A. Mm-hmm.

1 Q. Between you and your wife, who started first?

2 A. Lido, my wife.

3 Q. Yes, your wife. When did your wife start?

4 A. 2020.

5 Q. Okay. 2020. And you started 2021, correct?

6 A. Yes, yes.

7 Q. All right. And then the first person from Feeding Our
8 Future that met with you was -- who was that?

9 A. The first person?

10 Q. The first person.

11 A. Meet with me?

12 Q. Yes.

13 A. Coming from Feeding Our Future?

14 Q. Yes.

15 A. Shafi came.

16 Q. Shafi?

17 A. Yes.

18 Q. Shafi came to your store?

19 A. To my wife's store.

20 Q. Oh. To your wife's store. When was that?

21 A. 2020.

22 Q. What month?

23 A. I don't exactly remember.

24 Q. All right. And, and so in 2021 when you started, who
25 from Feeding Our Future came to your store for you to start

1 with the program in 2021?

2 A. Eidleh continuously.

3 Q. All right.

4 A. From Lido.

5 Q. Now, I'm not talking about Lido. I'm talking about you.

6 All right?

7 Lido is a separate business, correct?

8 A. Yes.

9 Q. Okay. And what is the name of your business?

10 A. SAFE, Somali American Faribault Education.

11 Q. Somali American Faribault Education. That short form is

12 SAFE, right?

13 A. Yes.

14 Q. I'm going to use the word "SAFE" because it's simpler.

15 All right?

16 A. Yes, yes.

17 Q. When did SAFE start with Feeding Our Future?

18 A. 2021.

19 Q. 2021? Who from Feeding Our Future met with you to start

20 the program?

21 A. Eidleh.

22 Q. Eidleh. And it was not Shafi, correct?

23 A. No.

24 Q. Because Shafi was already not part of Feeding Our Future

25 in 2021, correct?

1 A. No. You are right.

2 Q. Was he part of Feeding Our Future in 2021?

3 A. No, I haven't seen him.

4 Q. Oh, you didn't see him at all.

5 A. No.

6 Q. So he was gone from Feeding Our Future, as far as you
7 know.

8 A. As far as, yes.

9 Q. All right. So that first meeting, you are not sure
10 about the month. Was it, is it in December or towards
11 January 2021?

12 A. 2021, my own assumption was it was February.

13 Q. February 2021. And Eidleh came to your, to your store,
14 correct?

15 A. Yes.

16 Q. All right. And then that first meeting did, did Eidleh
17 talk to Ms. Bock, that first meeting in February?

18 A. Eidleh -- can I go back? Eidleh came --

19 Q. No. Hang on. Hang on. Hang on.

20 A. Okay.

21 Q. I want you to answer my question.

22 A. Okay. Okay.

23 Q. If you don't understand, I will try to clarify.

24 A. Okay.

25 Q. All right. That first meeting, right, it was with you

1 and Eidleh, correct?

2 A. Mm-hmm.

3 THE COURT: Is that a yes?

4 THE WITNESS: Yes.

5 BY MR. UDOIBOK:

6 Q. Now at that meeting --

7 A. Yes.

8 Q. -- was Ms. Bock in person at that meeting?

9 A. Yes -- in person, no.

10 Q. No. Okay. And how did you know -- well, let me back
11 up.

12 Did you talk to Ms. Bock that first meeting?

13 A. Yes.

14 MR. BOBIER: Objection. Vague as to "first
15 meeting," with SAFE, with Lido, with the application?

16 THE COURT: Sustained.

17 Can you rephrase?

18 BY MR. UDOIBOK:

19 Q. All right. Your first meeting with joining Feeding Our
20 Future, when was it?

21 MR. BOBIER: Same objection, Your Honor. Which
22 entity?

23 THE COURT: Overruled.

24 You can answer.

25 THE WITNESS: Say?

1 THE COURT: You may answer the question.

2 THE WITNESS: Eidleh and Aimee was explaining to
3 us is going to end, cooked food, and then we're going to
4 start the dry food. Can you, can you apply and nonprofit
5 organization.

6 And we said we have with, with FaceTiming. Eidleh
7 was there calling her.

8 BY MR. UDOIBOK:

9 Q. Okay. So this meeting was about sometime in
10 February 2021?

11 A. No.

12 Q. When was it?

13 A. It was, it was -- I don't remember exactly the month,
14 but when he was filling out the form for SAFE.

15 Q. Was it in the winter?

16 A. I don't remember exactly.

17 Q. All right.

18 A. I don't remember exactly.

19 Q. So in your mind, sometime -- you don't know the month --
20 2021, there was a meeting between you and Eidleh, correct?

21 A. Yes, with my wife.

22 Q. Sorry?

23 A. Yes.

24 Q. Your wife was also in attendance?

25 A. Yes.

1 Q. All right. And it was for SAFE joining Feeding Our
2 Future, correct?

3 A. Yes, yes.

4 Q. And but was Aimee there in person? No?

5 A. In person, no.

6 Q. Okay. And so, but you believe Eidleh was on the phone
7 also with Ms. Bock, correct?

8 A. I believe I seen her.

9 Q. You saw her. You saw the phone that, your phone or
10 Eidleh's phone?

11 A. Eidleh's phone.

12 Q. Eidleh's phone?

13 A. Yes.

14 Q. And your wife saw -- do you believe your wife saw
15 Ms. Bock on the phone also?

16 A. Yes.

17 Q. All right. And it was FaceTime?

18 A. Yes.

19 Q. All right. So, and it was Eidleh's phone?

20 A. Yes.

21 Q. All right. Okay. Mr. Hussein, do you realize that
22 Ms. Bock has never used FaceTime with Eidleh?

23 MR. BOBIER: Objection.

24 THE COURT: Mr. Udoibok.

25 The jury will disregard.

1 BY MR. UDOIBOK:

2 Q. All right. When that conversation you supposedly -- you
3 saw the FaceTime?

4 A. Yes.

5 Q. All right. And do you know what type of phone that was?

6 A. FaceTime.

7 Q. I mean what type of phone? Do you know?

8 A. What type of phone?

9 Q. What type of phone did Eidleh use?

10 A. I don't know, but I see he was using a phone.

11 Q. Okay. Have you ever used FaceTime?

12 A. Me?

13 Q. Yes.

14 A. Yes.

15 Q. All right. And do you know that when you call someone
16 on a FaceTime there's a record of that calling?

17 A. I don't know about that.

18 Q. Okay. All right. We'll shift to another.

19 So that first meeting, is it your testimony that
20 you heard Ms. Bock tell you to give her \$30,000?

21 A. Yes.

22 Q. At that first meeting?

23 A. The first meeting --

24 Q. Yes?

25 A. -- me and, what you called Eidleh and my wife, she was

1 there.

2 Q. Yes.

3 A. Calling her.

4 Q. Sorry. I don't mean to --

5 A. Calling her, calling her, I knew the program coming from
6 Lido, I knew we would pay \$30,000, and then still
7 continuously here I had to pay \$30,000.

8 Q. My question to you, though, is when you join -- forget
9 about your wife first. Okay? We'll get to that.

10 When you join in February 2021, did that first
11 meeting -- hold that thought -- did Ms. Bock ask you for
12 \$30,000?

13 A. Telling the same thing that she said, yes, you need to
14 pay \$30,000 in cash, same thing.

15 Q. She told, you heard that over the --

16 A. I heard that.

17 Q. Wait. Wait. Let me finish and then you can answer.

18 So you heard Ms. Bock say I want \$30,000 from you?

19 A. Yes.

20 Q. Correct?

21 A. Yes.

22 Q. Okay. And then is it your testimony that every time
23 Eidleh came to your store, all right, SAFE, Ms. Bock was
24 also on the phone on FaceTime with him asking for \$30,000
25 from you?

1 A. Yes.

2 Q. Okay. Every time. How many times?

3 A. Every month, one time.

4 Q. Every month?

5 A. Yes.

6 Q. All right. All right. And then you would draw \$30,000
7 from your bank account?

8 A. Yes.

9 Q. And you give it to Eidleh?

10 A. Yes.

11 Q. And then Eidleh will call you and tell you that he had
12 delivered the money to Ms. Bock?

13 A. No.

14 Q. Oh.

15 A. He was, when he gets there to my place, he called her
16 saying I'm here. Always he saying I'm here. I come. Here.
17 I'm here.

18 Q. Hold on. Hold on. Hold on. I just want to understand
19 that part.

20 So when Mr. Eidleh collects \$30,000 from you, then
21 he will call Ms. Bock?

22 A. He called her.

23 Q. He called her?

24 A. First.

25 Q. He called her first. And then join you on the phone?

1 A. And saying, and saying I'm here SAFE office with
2 Mohamed.

3 Q. No, no, no. I'm talking about after the money you've
4 been given. You've given Eidleh the money.

5 A. Mm-hmm.

6 Q. Okay?

7 A. Mm-hmm.

8 Q. After Eidleh collects the \$30,000 from you, how do you
9 know that he, he give Ms. Bock \$30,000?

10 A. Because he wouldn't, he wouldn't, he wouldn't call her
11 if he, if he, if he takes the money by his own money. He
12 called her when he get the money. He called her saying, I'm
13 here first, he say.

14 Q. Okay. So you are saying, you are saying when Eidleh
15 comes to your store?

16 A. He called her first.

17 Q. He'll call Ms. Bock, right?

18 A. First.

19 Q. And will be on the FaceTime?

20 A. On the FaceTime.

21 Q. All right. And then you give the 30,000, right?

22 A. And then he say, I'm here. I'm here with Mohamed. I
23 have the money in hand of 30,000.

24 Q. Okay. But then you don't have, you don't know -- let me
25 put it this way. I'm trying to understand.

1 When he leaves your store to deliver the money to
2 Ms. Bock, all right, you following me so far? Did Eidleh
3 call again to confirm that he is given the money?

4 A. No.

5 Q. Okay. So for ten months, you gave Eidleh \$30,000 to
6 give to Ms. Bock, correct?

7 A. When he gets to my SAFE, my office, he, he called her
8 saying I have the money in my hand with Mohamed, and then,
9 and then she said okay. He took the money.

10 Q. No. My question is, You said you participate in the
11 program for ten months, right?

12 A. Ten months, yes.

13 Q. So you gave \$30,000 a month?

14 A. Yes.

15 Q. In cash?

16 A. Yes.

17 Q. Okay.

18 A. But, but last, July, August, September, October, he took
19 a check. November it ended, the program.

20 Q. So in November ended the program?

21 A. Yes.

22 Q. But July through October you wrote checks, correct?

23 A. Yes, yes.

24 Q. And the checks, were the checks to Ms. Bock?

25 A. No.

1 Q. Okay. All right. But you believe that Ms. Bock got the
2 money?

3 A. No. He called her when I was write the check. He was,
4 he was calling, he called her saying I had the checks for
5 four, Bridge, something Bridge something. I don't remember.
6 I have the four checks from Mohamed he wrote. I have right
7 now.

8 He called and FaceTime, and then she said Mohamed
9 you did very good.

10 Q. Okay. So the Bridgewater -- Eidleh told you that
11 Ms. Bock will get that money that you wrote to Bridgewater,
12 correct?

13 A. No. He called her.

14 Q. I know. I know you said you call her, but your belief
15 is Ms. Bock got the money, right?

16 A. Yes, with, with announcing her. She said, thank you,
17 Mohamed. You give the checks for four checks. I said, yes.
18 Eidleh, do you have the checks. He said, yes. Four checks,
19 and then he took.

20 Q. And all this is on FaceTime?

21 A. FaceTime.

22 Q. FaceTime, okay.

23 A. Yes.

24 Q. So has Ms. Bock ever called you in person?

25 A. No, no.

1 Q. All right.

2 A. No.

3 Q. Have you ever called her?

4 A. No, ever.

5 Q. Okay. Now, I want to shift gears a little bit regarding
6 the money you made.

7 Did Ms. Bock tell you to buy the houses you bought
8 from the fraud you committed? Did she ask you to buy those
9 houses?

10 A. Say again, please?

11 Q. You committed fraud, right?

12 A. What?

13 Q. You committed fraud?

14 A. Yes.

15 Q. In the food program?

16 A. Yes.

17 Q. And you pled guilty, correct?

18 A. I plead guilty, yes.

19 Q. And your wife pled guilty also?

20 A. Yes.

21 Q. Okay. And how much, how much money, do you know how
22 much money SAFE collected from the federal government in the
23 food program?

24 A. How much? Amount?

25 Q. Yeah. How much?

1 A. Dollar amount I don't know.

2 Q. Let me see whether --

3 Ms. Mallet, would you pull up Exhibit X1 that is
4 in evidence.

5 A. Million of dollars I think. I'm sure, yes.

6 Q. Could you call out Somali American Faribault Education?
7 Yes, could you highlight just the one above that. That one,
8 call out that.

9 Does about \$3.1 million seem correct?

10 A. What you say?

11 Q. Does 3.1 -- \$3,170,702.03, does that seem correct?

12 A. Seems correct, yes.

13 Q. Okay. You used that money to buy houses, correct?

14 A. Yes.

15 Q. You used that money to buy cars, correct?

16 A. Yes.

17 Q. You used the money to send to your family overseas and
18 the Netherlands, correct?

19 A. Yes.

20 Q. Did Ms. Bock tell you to spend that money the way you
21 did?

22 A. No.

23 Q. Okay.

24 A. I did it my own.

25 Q. You did it your own. Did you FaceTime Ms. Bock that you

1 were going to spend the money the way you did?

2 A. Say again?

3 Q. Did you tell Ms. Bock that you were going to spend the
4 money?

5 A. Did I tell?

6 Q. Yes.

7 A. We never communicate.

8 Q. All right.

9 A. FaceTiming from Eidleh only.

10 Q. Okay. So I want to talk about --

11 You can take that down.

12 I want to talk about a meeting you had at Feeding
13 Our Future at some time in April 2020, correct?

14 A. 2020?

15 Q. Yes. Did you have a meeting at Feeding Our Future about
16 April of 2020?

17 A. I said SAFE. You talking about SAFE?

18 Q. No. I'm talking about a meeting. Were you at a
19 meeting?

20 A. I was at a meeting, yes.

21 Q. Well, let me just, let me try to -- let me finish.

22 A. Okay.

23 Q. All right. Were you in a meeting at Feeding Our Future
24 around April 2020?

25 MR. BOBIER: Objection. Misstates testimony as to

1 time.

2 THE COURT: Overruled.

3 You may answer if you can.

4 THE WITNESS: 2020 you said?

5 BY MR. UDOIBOK:

6 Q. Yes.

7 A. I don't think so. I don't know.

8 Q. Okay.

9 A. 2020.

10 Q. So sometime, though, you went to Feeding Our Future
11 building where there was a meeting, correct?

12 A. Yes.

13 Q. All right. And at that meeting you testified there were
14 other people.

15 A. Yes.

16 Q. All right. Were there sites, people that were running
17 sites, correct?

18 A. The people around running sites, yes.

19 Q. And when was that meeting?

20 A. When?

21 Q. Yes.

22 A. I don't remember exactly.

23 Q. Was it 2020, or was it 2021?

24 A. I don't remember. It was -- I don't remember.

25 Q. Well, had you been part, had SAFE been part of Feeding

1 Our Future food program when you went to that meeting?

2 A. Yes.

3 Q. All right. Remember, you joined the meeting. You
4 joined Feeding Our Future in 2021, correct?

5 A. Yes.

6 Q. All right. So when in 2021 did you go to Feeding Our
7 Future?

8 A. Which month?

9 Q. Anytime you recall.

10 A. I don't know.

11 Q. You don't know?

12 A. I don't remember.

13 Q. So some time in 2021, you went to Feeding Our Future.
14 You don't recall the time. And there was a meeting where
15 Aimee was talking?

16 A. Yes.

17 Q. Aimee Bock was talking?

18 A. Yes.

19 Q. And if I understand you well, Aimee Bock told the people
20 not to buy cars and houses from food money; is that correct?

21 A. Don't buy houses, don't buy cars. Yes, that's what she
22 said.

23 Q. Don't buy cars. Don't buy houses. And that is just
24 fine. To understand, it is not good to use food money to
25 buy cars and houses; is that correct?

1 MR. BOBIER: Objection. Misstates the testimony.

2 THE COURT: Sustained.

3 BY MR. UDOIBOK:

4 Q. All right.

5 Your Honor, may I approach?

6 THE COURT: You may.

7 **(Sidebar discussion)**

8 THE COURT: Mr. Udoibok.

9 MR. UDOIBOK: Your Honor, I'm trying to
10 cross-examine a witness that I believe is not truthful. And
11 I'm entitled to paraphrase a statement, and he can disagree
12 or agree with me.

13 I have quite a bit of latitude in
14 cross-examination. I'm not misstating the statement. The
15 man is not fluent in English. And what I understood, I can
16 get clarity as to what he said. He can disagree or agree
17 with my --

18 THE COURT: Mr. Udoibok, my ruling is my ruling.
19 I don't want a sidebar for you to argue with my ruling. It
20 is a ruling --

21 MR. UDOIBOK: Okay.

22 THE COURT: -- under the Rules of Evidence. It
23 misstated the testimony.

24 MR. UDOIBOK: Thank you.

25 **(In open court)**

1 BY MR. UDOIBOK:

2 Q. All right. So I want to talk about that meeting. And
3 let me, let me understand what your testimony was.

4 You testified earlier that Aimee told people not
5 to buy cars, correct?

6 A. Not to buy cars, not buy houses.

7 Q. Okay.

8 A. Yes.

9 Q. Did she say those people shouldn't buy houses at all or
10 not to use the food money to buy houses and cars?

11 A. Initially she was advising them that don't buy houses,
12 don't buy cars. You become -- you will be seen. You will
13 become obvious, something like that.

14 Q. So did you understand that to mean that, that people
15 shouldn't buy cars even if they have the money to buy cars?

16 A. People cannot buy? What did you say?

17 Q. Well, did you get -- I don't know how to put it. I will
18 try.

19 So Ms. Bock did not want people to buy cars and
20 houses?

21 A. Because of that, you know, lie, amount for the
22 government.

23 Q. Because of the lies they have made to the government, so
24 they shouldn't buy cars?

25 A. I mean, that's what it, you know.

1 Q. Did you get the sense -- what if someone has his own
2 money to buy a car? They shouldn't buy it. Is that what
3 you understood that to mean?

4 A. That's fine. That's decision of the person.

5 Q. Okay.

6 A. But this money was bunch of lie, no good. I never make,
7 I been here for 26 years. I never make money 200,000 for my
8 life. And this, Aimee came this program, and I make
9 200,000, you know, every month.

10 And then the lawyer don't make, the doctors don't
11 make. They know -- she knew and I knew that was lie. And
12 then that's why she was advising them don't be obvious,
13 don't be seen.

14 Q. Don't be seen and don't be obvious. Spending food money
15 and buying cars?

16 MR. BOBIER: Objection. The objection from
17 earlier, Your Honor.

18 THE COURT: I'm going to overrule it.

19 You may answer.

20 THE WITNESS: What did you say?

21 BY MR. UDOIBOK:

22 Q. You use the word "obvious," that Aimee said you thought
23 don't be obvious in using food money to buy cars and houses.

24 A. This, this, this is -- she knew that this money is not
25 my money to earn.

1 Q. Yes.

2 A. That's why she saying that hide as much as you can.

3 Q. She used the word "hide"?

4 A. No. That's what she was, that's what I interpret it,
5 and that's what she meant. Don't buy cars, don't buy cars,
6 don't buy houses.

7 Q. Okay.

8 A. It means don't use this money for, to become seen for
9 the public.

10 Q. Okay. Is it, but you don't know what -- is your
11 interpretation of don't buy cars and houses, correct?

12 A. Don't buy houses, don't buy cars. She mean, you know,
13 she said don't become obvious or people see you.

14 Q. Did she use the word "don't become obvious"?

15 A. Yes.

16 Q. Okay. Don't become obvious. And you interpret "don't
17 become obvious" by saying don't buy cars and don't buy
18 houses. Okay?

19 MR. BOBIER: Objection. That's not his
20 interpretation. This is asked and answered. The testimony
21 is consistent.

22 THE COURT: Sustained.

23 BY MR. UDOIBOK:

24 Q. All right. Now let's talk about the fight. You said at
25 that meeting, testified earlier, that there was, Ms. Bock

1 was fighting for the program?

2 A. Yes. There were some issues with the program at the
3 time. I don't remember exactly the month.

4 Q. At this time you are already part of the program?

5 A. Say that again?

6 Q. At this time, at this meeting, you were not part of the
7 program yet, though, are you? Were you?

8 A. Obviously I was. How would I go to the meeting if I
9 weren't in the program?

10 Q. I just want to know when you, you had this meeting at
11 Ms. Bock's office. Were you already part of the Feeding Our
12 Future program?

13 A. I think in 2021, I think, I don't know exactly 2021
14 or -- but I was part of the program, I think.

15 Q. Would you have gone because your wife was already part
16 of the program?

17 MR. BOBIER: Objection. The testimony should
18 speak for itself. This is all asked and answered.

19 THE COURT: Sustained.

20 BY MR. UDOIBOK:

21 Q. All right. Let's go to Q138.

22 You testified about this document earlier,
23 correct? Do you remember this? Do you remember this?

24 A. Yes.

25 Q. Highlight all of it?

1 MS. MALLET: Sorry.

2 MR. UDOIBOK: Call out the top, please.

3 BY MR. UDOIBOK:

4 Q. You sent this email, correct?

5 A. Mm-hmm.

6 Q. Is that a yes?

7 A. Yes.

8 Q. And you sent it --

9 A. Sorry.

10 Q. -- to Farhia at Feeding Our Future, correct?

11 A. Feeding Our Future, yes.

12 Q. Who is Farhia?

13 A. Farhia, she sometimes come to the office, inspection.

14 Q. Okay. She, Farhia works for Feeding Our Future --

15 A. Yes.

16 Q. -- correct?

17 A. Yes.

18 Q. And what is nationality is Farhia?

19 A. Somali.

20 Q. Somali. All right. And sometimes Farhia comes to your
21 store?

22 A. Sometimes, not always.

23 Q. In ten months that you participated in the Feeding Our
24 Future program, how many times did Farhia come to your
25 store --

1 A. I don't recall.

2 Q. Wait. Let me finish. How many times?

3 A. I don't recall.

4 Q. All right. More than once?

5 A. No. I don't, I don't remember how many times she came,
6 but she sometimes come.

7 Q. Okay. Is it more than one time?

8 A. Yes, more than one time.

9 Q. More than three?

10 A. I don't remember.

11 Q. All right. Now, how did you get Farhia's email address?

12 A. We, we send the paper.

13 Q. I know.

14 A. Yes.

15 Q. So how did you get her email?

16 A. She sent it to us, the paper, from Feeding Our Future.

17 Q. She sent, so she sent you her email address for you?

18 A. From Feeding Our Future.

19 Q. Sir, wait. Let me finish.

20 So she sent you her email address so you can send
21 in the meal counts?

22 A. Meal counts.

23 Q. Is that a yes?

24 A. Yes.

25 Q. All right. My question to you is, when was -- how did

1 you come to get her email address?

2 A. She sent an email from there to us, to me.

3 Q. All right. When was the first time she did that?

4 A. I don't remember --

5 Q. Okay.

6 A. -- to be honest.

7 Q. Okay. So let's go to the first page. All right. Call
8 out the meal counts.

9 Now, sir, you testified that the meal counts were
10 fake, correct?

11 A. Yes.

12 Q. All right. And, Ms. Mallet, call out the signature
13 page, the signature section.

14 So whose signature is that?

15 A. Me.

16 Q. Okay. And who's initials are those?

17 A. Where? Me.

18 Q. All right. And when you were doing this, did you
19 FaceTime Ms. Bock?

20 A. When I, when I, when I submit?

21 Q. Yes.

22 A. To Feeding Our Future?

23 Q. No. When you were completing the meal counts.

24 A. When we completed the meal count.

25 Q. Yes, did you FaceTime Ms. Bock?

1 A. Did I FaceTime her? No.

2 Q. Okay. Let's go to page, page 9 of 138.

3 You testified that this was, this was one of your
4 invoices from Sysco, correct?

5 A. Yes, yes.

6 Q. And is it your testimony that Ms. Bock suggested Sysco
7 to you?

8 A. No.

9 Q. Did Ms. Bock suggest that you use Sysco?

10 A. No.

11 Q. Okay. Go to the third page. Scroll. No. Just scroll
12 down. Just scroll down. Don't call out. Scroll down the
13 form to review. Continue.

14 You see all those meal counts?

15 A. Yes.

16 Q. That you signed?

17 A. Yes.

18 Q. For the month of July?

19 A. What's that?

20 Q. I'm just, just watch the meal count. Okay. Stop here.

21 You fill out those meal counts. Who completed
22 page 8 of this exhibit?

23 A. Where?

24 Q. This one. The one you are looking at.

25 Call out.

1 A. This one?

2 Q. Yes.

3 A. We did it. We create.

4 Q. Okay. You created it?

5 A. Yes.

6 Q. Continue. I want to get to 19.

7 All right. You know how to purchase at Sysco,
8 correct? You've just seen Sysco's invoices, correct?

9 A. Say that again?

10 Q. You saw the Sysco invoices?

11 A. Yes, yes.

12 Q. All right. And then who created this page?

13 A. This one?

14 Q. Yes.

15 A. I create.

16 Q. You created it?

17 A. Yes.

18 Q. All right. And did you FaceTime with Ms. Bock for
19 creating page 19?

20 A. No.

21 Q. Okay. Continue. Stop.

22 This is another one that you created too?

23 A. Yes.

24 Q. All right. Did you FaceTime with Ms. Bock?

25 A. No.

1 Q. Okay. Continue.

2 This is another one?

3 A. Yes.

4 Q. July 22nd, 2021. Did you FaceTime Ms. Bock?

5 A. Aimee?

6 Q. Yes.

7 A. No.

8 Q. Okay. Continue. Now stop at 22.

9 On July 25th, 2021, you created it?

10 A. Yes.

11 Q. And whose signature is that?

12 A. My wife.

13 Q. All right. And your wife knew that you created it?

14 A. We create it.

15 Q. Okay.

16 A. Yes.

17 Q. You created it?

18 A. Yes.

19 Q. Scroll to 23.

20 And this was also your creation?

21 A. Yes.

22 Q. And your wife signs it?

23 A. Yes.

24 Q. Okay. Does your wife use computer?

25 A. We use computer, yes.

1 Q. Does your wife use computer?

2 A. Yes, yes, little bit.

3 Q. Let's go to Q134.

4 Your Honor, I'm not sure whether this is a time to
5 break.

6 THE COURT: We're going to break at 12:15.

7 MR. UDOIBOK: Okay.

8 THE COURT: Thank you.

9 BY MR. UDOIBOK:

10 Q. You testified that this is another meal count that you
11 sent out, correct?

12 A. Yes.

13 Q. All right. And let's go to page 14. And I'm going to
14 just scroll down from 14 to 16. This is another Sysco
15 purchase, right?

16 A. Yes.

17 Q. Continue to 16.

18 All right. Mr. Hussein, you know how to purchase
19 real food.

20 A. Yes.

21 Q. All right. And you know how to create invoices,
22 correct?

23 A. Yes.

24 Q. When you were creating the invoices, did you feel bad?

25 A. Yes.

1 Q. You were?

2 A. Yes, I was.

3 Q. All right.

4 A. I knew I was making --

5 Q. And when the checks came to you, did you feel bad?

6 A. When the check comes, no, I don't feel bad.

7 Q. Okay. But you were feeling bad when you were creating
8 them?

9 A. Yes.

10 Q. Let's go to Q133. Call out.

11 That's another invoice that you, you sent to
12 claims, correct?

13 A. Mm-hmm.

14 Q. And you sent it to claims and Farhia, correct?

15 A. Yes.

16 Q. Did you ever send any claims directly to Ms. Bock?

17 A. I send the claim Feeding Our Future.

18 Q. All right. And you just assumed that Aimee received it,
19 correct?

20 A. She's head of the --

21 Q. Yeah. She's the head. Okay.

22 Let's go to page 15.

23 You created this also?

24 A. Yes.

25 Q. And you didn't purchase sugar, did you?

1 A. No.

2 Q. All right.

3 A. Was a lie.

4 Q. Do you know whether this amount of sugar would have been
5 allowed in the program at all?

6 A. Say that again?

7 Q. I said, do you know whether this amount of sugar would
8 have been allowed at all in the program?

9 A. Allowed?

10 Q. Yeah.

11 A. What you mean "allowed"?

12 Q. Do you know whether, how do I put it? Do you know --
13 you agree this is a lot of sugar.

14 A. Yes.

15 Q. All right. Do you know whether this much sugar would
16 have been allowed at all in the program?

17 A. Do you know -- this --

18 Q. Okay. You know this is a lot of sugar.

19 A. A lot of sugar.

20 Q. Okay.

21 A. Which was lie. It wasn't real.

22 Q. It wasn't clear. Do you know whether this much sugar is
23 too much for the program?

24 A. It's too much to put the invoice to create it.

25 Q. It's too much. Yes?

1 A. Yes.

2 Q. Okay. All right. Let's go to W62, page 78. Call out
3 the check. There you go.

4 I believe you testified that Eidleh asked you to
5 write this check?

6 A. To what?

7 Q. Did Eidleh ask you to write this check?

8 A. Register what?

9 Q. Did Eidleh ask you to write the check that you see?

10 A. He called her and, and with FaceTiming saying we --
11 Aimee said we need to have checks and then, and then divided
12 by four, in four months.

13 And then I write the check, and I give Eidleh, and
14 she was in FaceTiming.

15 Q. And Ms. Bock, is it your testimony that Ms. Bock told
16 you to write it to Bridge Logistics LLC?

17 A. Yes. Yes. He, he, he was saying, he and her, it's have
18 this Bridge Logistics.

19 Q. Okay. So I just want to understand what your testimony
20 is.

21 Do you see the date? Call out the date for the
22 check.

23 All right. Highlight it. Do you see that date,
24 July 1st, 2021?

25 A. Yes.

1 Q. Do you see that?

2 A. Yes.

3 Q. Did you write the check that day?

4 A. Yes.

5 Q. All right. And is that your signature?

6 A. Yes.

7 Q. Okay. And is this, is this -- how much did you write?

8 A. 26,400.

9 Q. All right. Was this part of the 30,000 that you were
10 supposed to give to Aimee Bock?

11 A. Yes. Because in four months, in four months,
12 accumulation of writing the check, they were taking it.

13 Q. I don't understand. You testified that every month you
14 paid \$30,000 in cash, correct?

15 A. Yes, yes.

16 Q. All right. So in the month of July 2021, did you
17 already pay 30,000 in cash?

18 A. No. It included this amount.

19 Q. So you paid \$30,000, plus another 26,000?

20 A. No. Four months was --

21 Q. Wait, wait, wait, wait. Let me finish.

22 A. Okay.

23 THE COURT: You need to let him finish his answer
24 as well.

25 MR. UDOIBOK: Okay.

1 THE COURT: So re-ask the question.

2 MR. UDOIBOK: Please, I will.

3 BY MR. UDOIBOK:

4 Q. In July 2021, did you already give Eidleh for Ms. Bock
5 \$30,000 in cash?

6 A. No.

7 Q. No. Now, but you gave \$26,400?

8 A. Yes.

9 Q. Okay. Why didn't you give \$30,000 in cash.

10 A. Because I cannot, the bank doesn't allow you to take the
11 original amount one time.

12 Q. Okay. But all of the times you had given cash?

13 A. 30,000.

14 Q. You are giving cash?

15 A. Cash.

16 Q. Okay. And then in July, you only give \$26,400?

17 A. Yes.

18 Q. Why not \$30,000?

19 A. It was, he said, with her, he said we need to have four
20 months in a row check.

21 Q. Okay.

22 A. That's what I was giving.

23 Q. So four months in a row of \$30,000?

24 A. 26,000. I break it down. 26 became hundred something
25 thousand.

1 Q. So what made the difference? Why not pay the full
2 \$30,000? Why less?

3 A. That's what she was saying.

4 Q. No.

5 A. I don't know.

6 Q. What is your understanding, why pay less?

7 A. I don't know. I don't know.

8 Q. All right.

9 A. She said you need to write, she said you need to write
10 check for four months in a row, break down. That's what I
11 wrote, because this is nonprofit organization.

12 Q. Okay.

13 A. You cannot take the money in cash one time.

14 Q. So how many months in cash had you paid to Ms.,
15 Ms. Bock?

16 A. I don't remember.

17 Q. You don't remember?

18 A. No, I don't remember.

19 Q. Before July 2021 how many cash, \$30,000 cash, had you
20 given to Ms. Bock?

21 MR. BOBIER: Asked and answered, Your Honor.

22 THE COURT: Sustained.

23 THE WITNESS: Given her?

24 THE COURT: You don't have to answer that.

25

1 BY MR. UDOIBOK:

2 Q. All right. So let's go to the next page. Call out --
3 that's the same page. All right.

4 So this is June, and you wrote the same \$26,000,
5 correct?

6 A. Mm-hmm.

7 Q. All right. Go to the next page. Next page. Call out.

8 So this is, this is June 21st. Is this your
9 company, Lead the Way Minnesota?

10 A. I don't know.

11 Q. It's not your company. All right. Do you know who
12 Delta Food Services is?

13 A. I don't know.

14 Q. Okay. Let's go to the next page. Next page. Continue.
15 Just scroll through.

16 THE COURT: We're going to break here for lunch
17 until 1:15. So we'll be back here at 1:15, everyone.

18 All rise for the jury.

19 12:12 p.m.

20 **IN OPEN COURT**

21 **(JURY NOT PRESENT)**

22 THE COURT: Sir, I'll have you step down. And
23 I'll have the attorneys be seated.

24 Mr. Bobier, was the last exhibit the Bridge
25 Logistics bank records?

1 MR. BOBIER: That's correct, Your Honor. It's not
2 the SAFE account.

3 THE COURT: Okay. And so, Mr. Udoibok, I just, I
4 want you to move it along, and I want to make sure we're
5 doing a couple things.

6 One, that you are not talking over the witness. I
7 know you don't want him to talk over you, but I want you to
8 have him finish and not to talk over him.

9 Two, and to be prepared with your questioning so
10 we're not drawing this out unnecessarily.

11 All right. And my understanding is that somebody
12 wanted to place something on the record. It might have been
13 the government.

14 MR. THOMPSON: I do, Your Honor.

15 THE COURT: All right.

16 MR. THOMPSON: Your Honor, I just wanted to raise
17 an issue with a couple aspects of counsel's
18 cross-examinations of the government's witnesses. And it's
19 really twofold.

20 First, counsel has repeatedly been asking
21 questions of witnesses for which they have no foundation to
22 answer. When Agent Parks, for example, was on the stand
23 this morning, he was asked a series of questions about the
24 waivers. He said he had no knowledge of those waivers.

25 It's problematic because obviously he doesn't

1 know. Notably Emily Honer had been on the stand and did
2 testify about waivers and wasn't cross-examined on them
3 extensively, which makes it look like counsel essentially
4 wants to testify about waivers through a witness that has no
5 knowledge of them.

6 And he's asked a series of questions of do you
7 know, do you have any evidence that, in your investigation
8 do you have any evidence that. And the answers of course he
9 has no personal knowledge of. It's not that there's no
10 evidence of something. He doesn't know one way or the
11 other, and it's improper.

12 I would also note that that formulation of
13 questionings of, do you have any evidence that or you don't
14 have any evidence that, of -- when posed to agents is
15 opening the door, frankly, to the government on redirect
16 coming in and having agents testify to all aspects of the
17 investigation, even those aspects for which they weren't
18 personally involved.

19 The agents are professionals. They receive
20 training, and they are trained to testify about what they
21 personally did in an investigation. But when Mr. Udoibok,
22 instead of asking them, you don't personally know whether
23 Aimee Bock sent that email, asks you have nothing in your
24 investigation showing that she had any involvement in this,
25 the agents are professionals.

1 And they are not going to quickly walk through
2 that door when someone asks an errant question and risk a
3 trial by saying, actually we have a ton of evidence. I've
4 talked to this witness. I have talked to that witness.
5 I've sat through dozens of plea hearings where people have
6 admitted to things or paying kickbacks.

7 But again and again, Mr. Udoibok is asking those
8 questions in a way that is frankly confusing to the jury, I
9 think. Agent Parks, I mean, there was a series of questions
10 of waivers that were misleading, and Mr. Udoibok was
11 testifying to what essentially is his closing argument
12 through a witness that had no knowledge of this and posing
13 those not as do you know whether or do you have any
14 knowledge of the waiver situation, but posing them as
15 factual, of facts in this trial that are not facts in this
16 trial, at least not yet.

17 I don't think they ever will be, but we'll cross
18 that bridge when we come to it. I think that's problematic.

19 And secondly, and this was more notable through
20 the second witness, although it came up through Agent Parks
21 as well. Mr. Udoibok has repeatedly asked the same question
22 over and over and over again of witnesses.

23 It's been confusing, certainly to witnesses that
24 don't speak English as a native language, because they are
25 just asked the question. They are being asked it again.

1 And you can see Mr. Hussein repeatedly looking puzzled as to
2 didn't I just say this, did I misunderstand what you are
3 asking.

4 And Agent Parks faced it too, frankly, repeated --
5 sometimes being asked six, seven, eight times in a row the
6 same question because Mr. Udoibok didn't like the answer.
7 And I think that's improper cross.

8 And it puts us in a tough situation of having to
9 object again and again and again, and that really prejudices
10 us in front of the jury.

11 THE COURT: Mr. Udoibok, do you want to respond?

12 MR. UDOIBOK: Well, I believe the government not
13 agree with me. I believe under cross-examination it is
14 proper to test the knowledge upon which the witness is
15 testifying.

16 Agent Parks testified specifically about the
17 roster, just take the roster, as being fraudulent and that
18 he went, took the extraordinary steps and went to school
19 districts and all of that to show that the rosters were
20 fraudulent.

21 And in sum, he implied that the rosters influenced
22 the meal count for which Feeding Our Future derive money
23 from USDA.

24 My -- the basis of my cross-examination was, no,
25 the roster did not influence the meal count because the

1 roster was not considered by Feeding Our Future, because
2 that's an item, as a matter of law, was unnecessary. That's
3 it. It was a limited scope.

4 I may have, maybe, I don't know. Maybe I repeat
5 myself to get emphasis to extract the truth from a witness.
6 By no means am I suggesting or asking improper questions.
7 The court rules on my objections.

8 THE COURT: All right. Thank you.

9 A couple of points from the court. One, I think
10 it's not a correct statement of law to say that the
11 fraudulence of the rosters turns on the status of the
12 waivers. You may argue that in closing. But it certainly
13 wasn't a matter for Agent Parks.

14 More broadly, the concern of the government, and I
15 understand it, is that when you repeat too many times, and I
16 get that on cross you repeat a couple times for emphasis
17 sometimes, particularly with a witness who, like
18 Mr. Mohamed.

19 When you do that too many times, you are forcing
20 the government to stand up and say asked and answered
21 multiple times. I don't think that's fair. I do not like
22 to jump in. You all know at this point I'm not one to jump
23 in.

24 But I'm going to start jumping in and saying move
25 along, which is a Judge Rosenbaum move so I feel like I can

1 do it.

2 You can't ask a question 15 times, 15 different
3 ways. It's not proper under the rules. And it's at that
4 point proper for me to jump in, and I'll do it just because
5 it's been happening too many times.

6 The wide open question, do you have any evidence,
7 that isn't a proper question. And so I'm going to caution
8 you against that as well.

9 I'm simply trying to move this along and make sure
10 we are being fair to the witnesses in particular, but also,
11 I want you to be able to explore all avenues that you need
12 to explore.

13 MR. UDOIBOK: Thank you, Your Honor. You are the
14 gatekeeper.

15 THE COURT: I am.

16 MR. UDOIBOK: And I'll follow your instruction.

17 THE COURT: Okay.

18 MR. UDOIBOK: I respect the court.

19 THE COURT: I know.

20 MR. UDOIBOK: But I have to vigorously represent
21 my client.

22 THE COURT: I understand that.

23 The last thing I'll say, and I've already said it,
24 which is when I rule, I rule. And the nature of the
25 objection is that one party's going to be unhappy with my

1 ruling. We move on.

2 All right. Let's take till 1:20. Thank you.

3 (Recess taken at 12:21 p.m. till 1:23 p.m.)

4 1:23 p.m.

5 **IN OPEN COURT**

6 **(JURY PRESENT)**

7 THE COURT: You may all be seated.

8 And, Mr. Udoibok, you may continue.

9 MR. UDOIBOK: Thank you, Your Honor.

10 BY MR. UDOIBOK:

11 Q. Mr. Hussein, I just have a few questions for you --

12 A. Yes.

13 Q. -- based on your testimony earlier. You talked about a
14 clicker.

15 Do you remember that?

16 A. Yes.

17 Q. And what is a clicker?

18 A. It's metal, and then you press it, and then you reach up
19 to where you supposed to be in terms of she saying, she said
20 that you do 2,000 every day. And then you read up to 2,000
21 clicker, click, click, click, and 2,000, you stop.

22 On Tuesday, same thing, you click, click, click,
23 click. And then you read up to the claim 2,000, you
24 claiming. And then Wednesday same thing. Thursday same
25 thing. And then that's what clicker means.

1 Q. Okay. Do you know when -- oh, I take it when you said,
2 "She said," you mean Ms. Bock, right?

3 A. Yes.

4 Q. All right. When did she give you the clicker?

5 A. The clicker, Mr. Eidleh brought to us, but when he gets
6 to my office, he called her and FaceTiming again. And he
7 give me, and he confirmed that I have clicker.

8 Q. All right. Okay. That -- I know, I know we talked
9 about FaceTime.

10 So the clicker was given to you when?

11 A. I don't remember when exactly.

12 Q. Okay.

13 A. The year or the month.

14 Q. You don't know the year. You don't know the month.

15 A. No. You saying --

16 Q. All right.

17 A. When you said?

18 Q. When was the clicker given to you?

19 A. 2021.

20 Q. 2021. Was it the first, at the first meeting?

21 A. I don't remember exactly.

22 Q. Was it the second meeting?

23 A. I don't recall, to be honest, but first when we started
24 the program, you have to have clicker right away.

25 Q. Okay. So when did you start the program?

1 A. 2021.

2 Q. All right. So, but it was Eidleh that gave you the
3 clicker?

4 A. Yes.

5 MR. BOBIER: Objection. Asked and answered, Your
6 Honor.

7 THE COURT: Sustained.

8 MR. UDOIBOK: And then Ms. Bock describe for you
9 how to use the clicker?

10 THE WITNESS: Yes.

11 BY MR. UDOIBOK:

12 Q. All right. And the description was through Eidleh's
13 phone, correct?

14 A. She, he called her FaceTiming through Eidleh's phone.

15 Q. Okay. And you saw her face?

16 A. I saw her face.

17 Q. Was your wife with you at that meeting?

18 A. The meeting, when I have the clicker?

19 Q. Yes.

20 A. Yes.

21 Q. Was your wife with you during all the meetings that you
22 had with Eidleh?

23 A. All the meeting?

24 Q. Mm-hmm. Yes.

25 A. One time a month. Every month he comes one time --

1 Q. Okay.

2 A. -- when he's collecting the money.

3 Q. Okay. What I'm saying, when he's coming once a month
4 and collecting the money, was your wife with you?

5 A. Yes.

6 Q. I want to go to, you testified earlier that in 2022 you
7 met with the agents.

8 A. 2022. Yes, several agencies.

9 Q. And you were nervous.

10 A. Say again?

11 Q. You were nervous.

12 A. I was scared.

13 Q. You were scared. Okay. And why were you scared?

14 A. I never meet with the government, FBI. All those
15 different agencies I never met before in my life.

16 Q. Were you scared because they would find out about your
17 fraud?

18 A. I scared because of I'm sitting with them on,
19 interrogating questions on what I did wrong and what I do
20 wrong and why I do wrong, all those type of -- you know, I
21 don't remember. It's a long time now. It's three years I
22 think.

23 Q. But you were scared?

24 A. Say again?

25 Q. You were scared?

1 A. I remember I was scared.

2 Q. And you testified that at that meeting you did not tell
3 everything?

4 A. Yes. I not tell everything.

5 Q. Why didn't you tell everything?

6 A. Why?

7 Q. Why didn't you tell, tell everything?

8 A. I didn't tell everything. At the time I was scared.

9 Q. All right. So because you were scared, you didn't tell
10 everything?

11 MR. BOBIER: Objection. Asked and answered.

12 THE COURT: Sustained.

13 BY MR. UDOIBOK:

14 Q. All right. And then after that you, you hired a lawyer?

15 A. Say that again?

16 Q. You hired a lawyer after that meeting?

17 A. I hired the lawyer.

18 Q. Okay. And then you decided to tell the truth?

19 A. Yes, I have to tell the truth.

20 Q. When did you decide to tell the truth?

21 A. You know, when you do something wrong, you have to tell
22 the truth. Yes, anytime.

23 Q. Yes. When did you decide, though, to tell the truth?

24 A. Which year or when do you mean?

25 Q. I said, when did you decide to tell the truth?

1 A. I have to tell the truth the government. I did wrong.

2 Q. Okay. But when did you decide?

3 A. Which night or which day you mean?

4 Q. Do you have a time you decided to tell the truth?

5 A. I can't remember no time.

6 Q. How many times did you meet with the government agents?

7 A. That, that time 2022 when I was, when I was scared --

8 Q. Okay.

9 A. -- to meet them different agencies. At the time I made
10 here, to come here with Your Honor, judge.

11 Q. So when you came to court, you decided?

12 A. When I came to the court, I plead guilty.

13 Q. And you decided --

14 A. One time, yes.

15 Q. -- and you decided to tell the truth?

16 A. Yes.

17 Q. Okay. Did you decide to tell the truth when you met
18 with the government lawyers after your first meeting?

19 A. Say again, please?

20 Q. I'll try. So let's -- you met with the lawyer, met with
21 the agents the first time?

22 A. Yes, 2022.

23 Q. All right. Did you meet with the government any other
24 time?

25 A. Any other time?

1 Q. Yes.

2 A. No.

3 Q. Okay.

4 A. No.

5 Q. All right. So the next time you met?

6 A. When I was pleading guilty.

7 Q. Okay.

8 A. Here.

9 Q. All right.

10 Excuse me, Your Honor.

11 Did you talk to your wife about your testimony,
12 about her testimony?

13 A. Did I talk -- did I tell my wife?

14 Q. No. Did you talk to her about her testimony?

15 A. She knows I was coming today.

16 Q. You never told her.

17 MR. BOBIER: Objection. Misstates testimony.

18 THE COURT: Sustained.

19 BY MR. UDOIBOK:

20 Q. All right. Maybe I'll put it this way: Did you discuss
21 your wife's testimony?

22 MR. BOBIER: Objection. Vague as to time.

23 THE COURT: Sustained.

24 Can you be a little more specific?

25

1 BY MR. UDOIBOK:

2 Q. Do you know whether your wife testified in this court?

3 A. Did I know?

4 Q. Yes.

5 A. Yes, I knew she that day she was coming, because she's
6 my wife.

7 Q. Okay.

8 A. We live together.

9 Q. All right. Did you discuss her testimony?

10 A. Discuss mean?

11 Q. Yes. Did you, did you talk to your wife about her
12 testimony?

13 MR. BOBIER: Objection. Vague as to time.

14 THE COURT: Rephrase, please.

15 BY MR. UDOIBOK:

16 Q. Did you discuss with your wife her testimony in this
17 court?

18 MR. BOBIER: Same objection, Your Honor.

19 MR. UDOIBOK: I'll rephrase.

20 THE COURT: Please.

21 BY MR. UDOIBOK:

22 Q. So your wife told you that she came to court to testify,
23 right?

24 A. I drove her to be here.

25 Q. Okay.

1 A. Yes.

2 Q. And you came to this courthouse?

3 A. I came with my kids when she was coming here.

4 Q. Okay. And then you dropped her off at the courthouse
5 here?

6 A. We dropped, we dropped her off on the street.

7 Q. Okay. On the street. And she came to testify in this
8 court, correct?

9 A. She came testify in -- I don't know which room, but in
10 this court, in the court.

11 Q. Okay. And after court, did you talk to her about her
12 testimony in court that day?

13 A. Asking her what she said or what?

14 Q. Yes. Yes.

15 A. I don't need to ask. She was testifying what she was
16 doing wrong.

17 Q. Excuse me?

18 A. She was testifying what she was doing wrong.

19 Q. No. Did you talk to her about it?

20 A. I knew. I knew. I don't, I don't understand. Did I
21 talk to her saying what did you say or something like that
22 you saying?

23 Q. Yes.

24 A. No.

25 Q. No?

1 A. You know, I knew she was wrong. I knew I was wrong. We
2 did wrong. We lied to the government, and I, you know, we,
3 she was telling the truth, and I'm here telling the truth.

4 I don't say what you say, what you did. I didn't
5 say.

6 Q. So you never talked to her --

7 MR. BOBIER: Objection. Asked and answered four
8 times now, Your Honor.

9 THE COURT: I'm going to allow -- well, I want you
10 to finish it so that I hear it, and I think I'm going to
11 allow it.

12 Go ahead.

13 BY MR. UDOIBOK:

14 Q. One last question.

15 A. Yes.

16 Q. Did you talk with your wife about her testimony in court
17 that day?

18 MR. BOBIER: Objection, Your Honor. Asked twice.

19 THE COURT: It's asked and answered.

20 BY MR. UDOIBOK:

21 Q. Maybe I should put it this way: Did your wife tell you
22 about her testimony?

23 MR. BOBIER: Objection, Your Honor. Same
24 question.

25 THE COURT: Sustained.

1 MR. UDOIBOK: No further questions.

2 THE COURT: Mr. Montez.

3 MR. MONTEZ: No questions, Your Honor.

4 THE COURT: Mr. Bobier.

5 MR. BOBIER: Nothing further, Your Honor.

6 THE COURT: Sir, you may step down. Thank you for
7 being here. You are finished. Thank you.

8 THE WITNESS: I go?

9 THE COURT: You can go.

10 THE WITNESS: Thanks, Your Honor.

11 THE COURT: Mr. Jacobs, the government may call
12 its next witness.

13 MR. JACOBS: Thank you, Your Honor. The
14 United States calls John Senkler.

15 THE COURT: Good afternoon, sir. I'm going to
16 have you take that off. All right.

17 THE WITNESS: Hmm?

18 THE COURT: Hat off, please. Thank you.

19 Would you raise your right hand for me while you
20 are standing? Thank you.

21 JOHN SENKLER,

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

24 THE WITNESS: Yes.

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

1 And when you are settled, I'll have you state and
2 spell both your first and last name for the record.

3 THE WITNESS: John, J-O-H-N, Senkler,
4 S-E-N-K-L-E-R.

5 THE COURT: Thank you.

6 Mr. Jacobs, you may inquire.

7 MR. JACOBS: Thank you, Your Honor.

8 DIRECT EXAMINATION

9 BY MR. JACOBS:

10 Q. Good afternoon, Mr. Senkler.

11 A. Hi.

12 Q. Can you please tell the jury where you grew up?

13 A. Minneapolis.

14 Q. And how far did you go in school?

15 A. High school, graduated.

16 Q. From which high school?

17 A. Cretin-Derham Hall.

18 Q. And after that, what did you do for education?

19 A. Nothing.

20 Q. And did you start working then?

21 A. Yes.

22 Q. What did you do for jobs?

23 A. I worked in the restaurant industry.

24 Q. Can you tell the jury a little bit about your experience
25 in the restaurant industry?

1 A. Worked pretty much every job in the restaurant industry
2 for 30 years now, bartend, managed, owned.

3 Q. And you said you've been doing that for about 30 years?

4 A. Yeah.

5 Q. Ever work at an establishment called Fabulous Fern's?

6 A. Yes.

7 Q. What's that?

8 A. It's a restaurant located on, it was located on Selby
9 Avenue in St. Paul.

10 Q. Family connection to that?

11 A. Yeah, my father was the owner.

12 Q. What are some of the other bars or restaurants that
13 you've worked at in the last 30 years?

14 A. Eagle Street, Oxcart, Hefner's, New Bohemia.

15 Q. To name a few?

16 A. Yeah.

17 Q. Okay. And what are you doing for work currently?

18 A. I bartend still.

19 Q. Okay. What establishment?

20 A. Huh?

21 Q. At what bar?

22 A. New Bohemia.

23 Q. Okay. I want to ask you now about someone named Aimee
24 Bock. Okay?

25 A. Okay.

1 Q. Do you know Aimee Bock?

2 A. Yes.

3 Q. And how do you know her?

4 A. She was, she frequented the bar I worked at.

5 Q. Okay. And can you tell the jury what bar that was and
6 when that was?

7 A. Fabulous Fern's. That was around the time of 2010 to
8 2015.

9 Q. And in that time period of 2010 to 2015, how well did
10 you get to know Ms. Bock?

11 A. Socially I knew her. She was a customer, plus we had
12 some drinks together.

13 Q. Okay. In 2016, did you stop your job at Fabulous
14 Fern's?

15 A. Yeah, I stopped working there for a little bit and,
16 yeah.

17 Q. At that point in 2016, what did you start doing for
18 work?

19 A. I was offered a job to deliver food for the summer to
20 food sites.

21 Q. Who offered you that job?

22 A. Aimee.

23 Q. Aimee Bock?

24 A. Aimee Bock.

25 Q. And can you tell the jury a little bit about what

1 entailed that job of delivering food over the summer?

2 A. Basically I would pick up lunches in the morning in a
3 cooler, and I had a route every day, about I think it was
4 ten sites.

5 And I would sit there for about a half hour and
6 hand out food to children.

7 Q. About how many lunches would you give out on a normal
8 day?

9 A. 50 to 100.

10 Q. 50 to 100 lunches?

11 A. Yeah.

12 Q. Over ten spots?

13 A. Yeah.

14 Q. And can you tell the jury a little bit about what you do
15 when you are actually giving the lunches out?

16 A. Basically just sitting there with a cooler in front of
17 me, and the children would come up and give one per
18 children. You know, they have a rec center activity or
19 something, camp, so all the kids would get a meal.

20 Q. It would take you a full day to give out 100 lunches?

21 A. Yeah.

22 Q. And you give them right to the children?

23 A. Correct.

24 Q. Okay. How long did you work doing that job in 2016?

25 A. Just the summer, and that's it.

1 Q. Okay. After that, did you go back to the hospitality
2 industry?

3 A. Yes.

4 Q. Working in bartending or serving?

5 A. Yes.

6 Q. I want to jump ahead in time a little bit to the year
7 2022. In 2022 did you come to learn about a connection that
8 you had to Feeding Our Future?

9 A. Yes. I had a friend send me a link of the Star Tribune
10 newspaper, stating that I was a board member for the
11 business or whatever.

12 Q. For Feeding Our Future?

13 A. Feeding Our Future, correct.

14 Q. What was your reaction when your friend sent you a link
15 to an article claiming that you are a board member for
16 Feeding Our Future?

17 A. Kind of laughed about it.

18 Q. Why did you laugh?

19 A. Because it's kind of funny because I never was.

20 Q. Okay. What was your friend's reaction?

21 A. She was mad at me and was wondering what trouble I was
22 getting into.

23 Q. So I want to go back in time now. Was there ever a
24 point where Ms. Bock asked you if you wanted to have any
25 involvement with Feeding Our Future?

1 A. In 2016 at the end of the year, she asked me if I wanted
2 to be on the board.

3 Q. And what was your reaction when she asked you that?

4 A. Well, we were at the bar having drinks, so I thought it
5 was kind of funny, and I said no initially.

6 Q. Had you ever been on a board of a nonprofit before?

7 A. No.

8 Q. Have any experience with nonprofits?

9 A. No.

10 Q. And you said your initial reaction was you thought it
11 was funny.

12 A. Yeah, you know, we were having drinks and just kind of
13 joking around and stuff.

14 Q. You thought it was a joke when she asked you?

15 A. Mm-hmm.

16 Q. Okay. What happened after that?

17 A. She told me she just needed names to start the
18 organization and was going to dissolve it, the board, once
19 the organization got going and create a new board
20 internally.

21 Q. What was your reaction when you heard that?

22 A. I told her you can put me on the board, you can put my
23 name on it.

24 Q. Okay. Did you, what did you understand that you would
25 have to do as a board member for Feeding Our Future?

1 A. Absolutely nothing.

2 Q. After that time, did you have any involvement --

3 A. No.

4 Q. -- with Feeding Our Future?

5 A. Not at all.

6 Q. Did you even think you were on the board of Feeding Our
7 Future?

8 A. I had no clue.

9 Q. Did you ever think about Feeding Our Future in between
10 at that time and the time that your friend sent you the
11 article?

12 A. No.

13 Q. Ever been to a Feeding Our Future board meeting?

14 A. No.

15 Q. Asked a different way, would you even know what it meant
16 to be on the board of a nonprofit?

17 A. No, not a bit.

18 Q. I want to show you a document, okay, that's already in
19 evidence as Government's A80.

20 Okay. Mr. Senkler, these are some board meeting
21 minutes for Feeding Our Future. Do you see that?

22 A. Yes.

23 Q. Do you know what board meeting minutes are?

24 A. Figure they would be minutes that you spent in meetings.

25 Q. Okay.

1 A. But I don't know.

2 Q. This particular meeting info here says that the meeting
3 happened on March 22nd of 2020 at 9:00 a.m. at the location
4 of Feeding Our Future.

5 Do you know where Feeding Our Future's office is?

6 A. No.

7 Q. Have you ever been to Feeding Our Future's office?

8 A. No.

9 Q. I take it that you, since you've never been to Feeding
10 Our Future's office and you don't know where the office is,
11 you weren't at this board meeting?

12 A. No, I was not.

13 Q. Okay. Do you see the names of the individuals?

14 A. Yes.

15 Q. Can you read those names off for us?

16 A. Ben Stayberg, Jamie Phelps, John Senkler.

17 Q. Secretary of the board?

18 A. Secretary, yeah.

19 Q. Was that you John Senkler, secretary of the board of
20 Feeding Our Future?

21 A. Appears so.

22 Q. Are you familiar with Ben Stayberg?

23 A. Yes.

24 Q. How do you know him?

25 A. He's a fellow bartender in St. Paul, became good

1 friends, and we would go out and hang out a lot, golf.

2 Q. Kind of guy that's a board member of a \$250 million
3 nonprofit?

4 A. I wouldn't think so. I mean -- no.

5 Q. You know Jamie Phelps?

6 A. Yes.

7 Q. Do you think he's the kind of person that would be the
8 treasurer of the board of a \$250 million --

9 A. No.

10 Q. -- nonprofit?

11 A. No. Absolutely not.

12 Q. Why not?

13 A. You know, they both got good jobs, good careers. I
14 don't know if they would really put time in on something
15 like that.

16 Q. Didn't know them to have any interest in the nonprofit
17 world?

18 A. No.

19 Q. This meeting apparently took place in March of 2020. Do
20 you remember what you were doing in March of 2020?

21 A. No, no.

22 Q. Do you remember what you weren't doing, though?

23 A. I wasn't at that meeting.

24 Q. All right. Moving on to page 9 here. It looks --
25 moving on to page 10 or 9 here, it looks like there's

1 another board meeting. And again I'm going to highlight
2 this middle part.

3 Your name down here, John Senkler?

4 A. Yep.

5 Q. And it's marked as "present." Do you see that?

6 A. Yes.

7 Q. And this particular meeting was apparently a conference
8 call. Have you ever joined a conference call with Feeding
9 Our Future?

10 A. No.

11 Q. One of the topics that was apparently covered during
12 this board meeting was management plan review updates. Any
13 idea what that would be about?

14 A. No. No idea. No clue.

15 Q. It says you made a motion relating to the management
16 plan review updates. Did you make that motion?

17 A. I don't even know what a motion is, but no.

18 Q. Okay. Another meeting here. This one, January 20th of
19 2021. And this location is again Feeding Our Future.

20 Still don't know where Feeding Our Future office
21 is?

22 A. No.

23 Q. There's a check in the "present" column next to your
24 name. Did you attend this meeting at Feeding Our Future?

25 A. No.

1 Q. Another one from April of 2021. Do you remember what
2 you were doing in April?

3 A. I do not.

4 Q. Were you at a special meeting of Feeding Our Future?

5 A. No.

6 Q. Again see your name there?

7 A. Yes.

8 Q. Mr. Senkler, you testified earlier about learning from a
9 friend that you were on the Feeding Our Future board in
10 2022.

11 Do you remember that?

12 A. Yes.

13 Q. After you learned about that, what did you do?

14 A. Tried to contact Aimee, Aimee Bock.

15 Q. And what did you do?

16 A. I sent her a text message.

17 Q. What did you ask her?

18 A. I said what's going on.

19 Q. What was her response?

20 A. That she will contact me later.

21 Q. Did she ever contact you?

22 A. No.

23 Q. How do you feel about your name being used on these
24 Feeding Our Future board minutes?

25 A. I don't know. It's just kind of crappy, you know.

1 MR. JACOBS: No further questions.

2 THE COURT: Mr. Udoibok.

3 MR. UDOIBOK: Yes, Your Honor.

4 CROSS-EXAMINATION

5 BY MR. UDOIBOK:

6 Q. You testified earlier -- by the way my name is Kenneth
7 Udoibok.

8 A. Hi.

9 Q. I represent Aimee Bock.

10 You testified earlier that Ms. Bock came to
11 Fabulous Fern's, is that --

12 A. Correct.

13 Q. About what year was that?

14 A. Between 2010, 2015.

15 Q. And in 2016 she asked you to join the board of Feeding
16 Our Future?

17 A. Correct.

18 Q. Okay. And I believe you testified that jokingly you
19 agreed to join the board?

20 A. Correct.

21 Q. And that's the last time you ever met with Ms. Bock?

22 A. Correct.

23 Q. And that would be 2016?

24 A. Mm-hmm.

25 Q. All right. Did you ever receive any correspondence from

1 MDE regarding Feeding Our Future?

2 A. No.

3 Q. Okay. And so you tried to call Ms. Bock, and you never
4 returned -- she never returned your call?

5 A. Correct.

6 Q. Or, no. It was a text, right?

7 A. Yes.

8 Q. Ms. Mallet, would you call up A80, please.

9 A. Me?

10 THE COURT: No.

11 BY MR. UDOIBOK:

12 Q. I'm talking to someone else. Sorry.

13 I want you to go to page 7, please, Ms. Mallet.

14 A80, not 8. Just scroll down through 15.

15 So I just want you to look at this document. By
16 the way, is this the first time, the first time you've seen
17 this document?

18 A. Yes.

19 Q. Okay. You are at 15.

20 Do you know personally who completed that, those
21 documents?

22 A. No.

23 MR. UDOIBOK: No further questions.

24 THE COURT: Mr. Montez.

25 MR. MONTEZ: No questions, Your Honor.

1 THE COURT: Mr. Jacobs.

2 MR. JACOBS: No redirect, Your Honor.

3 THE COURT: You may step down, sir. Thank you for
4 being here.

5 And the government may call its next witness.

6 MR. BOBIER: Thank you, Your Honor. The
7 government calls FBI Special Agent Travis Wilmer.

8 THE COURT: I'm going to re-swear you.

9 TRAVIS WILMER,

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

12 THE WITNESS: I do.

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

14 And, Mr. Bobier, when he's settled, you may
15 inquire.

16 MR. BOBIER: Thank you, Your Honor.

17 DIRECT EXAMINATION

18 BY MR. BOBIER:

19 Q. Good afternoon, Special Agent Wilmer.

20 A. Good afternoon.

21 Q. How are you?

22 A. Doing well.

23 Q. When we last spoke with you, you told us you work at the
24 FBI?

25 A. That is correct.

1 Q. Can you remind us what squad you are on at the FBI?

2 A. I'm a special agent at the FBI, Minneapolis office,
3 currently assigned to the white color squad.

4 Q. And remind us previously what sorts of criminal
5 investigations you work on as a member of the white color
6 squad.

7 A. Generally investigations involving financial crimes,
8 whether that be money laundering, wire fraud, things of that
9 nature.

10 Q. Okay. So today, Special Agent Wilmer, I'd like to go
11 through a few things that we've heard in the trial with you.
12 You've been seated right here throughout the whole trial; is
13 that right?

14 A. That's correct.

15 Q. Every day?

16 A. Every day.

17 Q. But before we go through some of that, I want to talk
18 about something we heard a little bit about this morning.

19 A. Okay.

20 Q. Were you here in the courtroom when Special Agent Parks
21 from the IRS testified yesterday and then a bit this
22 morning?

23 A. I was.

24 Q. You heard his testimony?

25 A. I did.

1 Q. And Special Agent Parks told the jury about his role in
2 the investigation looking at rosters; is that right?

3 A. That's correct.

4 Q. Can you remind us at a high level what he found when he
5 looked at the rosters in this case?

6 A. After analyzing a long list of rosters that were
7 submitted in support of claims through the sponsorship of
8 Feeding Our Future, he found that he believed most of those
9 were fabricated rosters.

10 And the reason for that being several factors,
11 including comparison to school district, public school
12 district enrollments, also repetitive use of the same names
13 with different ages and things that suggested that these
14 were not actual kids who actually received meals it at these
15 sites.

16 Q. When Special Agent Parks testified, you just described
17 he had concluded the rosters were fabricated; is that right?

18 A. That's correct.

19 Q. Fake kids. That was his testimony?

20 A. Correct.

21 Q. Fake names?

22 A. Correct.

23 Q. Fake ages?

24 A. Correct.

25 Q. And do you remember this morning as Special Agent Parks

1 was concluding his testimony about those rosters, defense
2 counsel asked him a long series of questions about whether
3 those rosters that Special Agent Parks had gone through were
4 actually required at all under the program?

5 A. I do recall that.

6 Q. Do you remember that long series of questions?

7 A. I do.

8 Q. And then defense counsel asked Special Agent Parks
9 another long series of questions about whether those rosters
10 were even used by Feeding Our Future?

11 A. That is correct. I recall that.

12 Q. Now, Special Agent Wilmer, are you an expert in the food
13 program?

14 A. I am not.

15 Q. Are you an expert in the regulations that govern it?

16 A. I am not.

17 Q. Have you read those regulations?

18 A. No, I have not.

19 Q. When Emily Honer was here from MDE at the beginning of
20 the trial, she testified about the waivers at some length;
21 is that right?

22 A. That is correct.

23 Q. She described at a high level that the USDA implemented
24 them to allow the program to operate during the pandemic; is
25 that fair?

1 A. That is correct.

2 Q. From your background in the investigation, do you know
3 if it is true that those rosters were not required under the
4 program?

5 A. I do not believe that to be true. Although the waivers
6 allowed for there to be flexibilities that had not existed
7 before, rosters were still collected by the sponsors to
8 support claims that were submitted to MDE for reimbursement.

9 Q. All right. So -- go ahead.

10 A. And this was a part of the program that was asked for by
11 the sponsors, as was MDE as well.

12 Q. All right. So to be clear about this, the rosters that
13 Special Agent Parks testified about for maybe a day all
14 told, your understanding is that those were required under
15 the program; is that right?

16 A. My understanding is that at times during the program,
17 including at times that we are looking at as part of this
18 investigation, rosters were required from the sponsors to
19 verify the claims that they then submitted to MDE for
20 reimbursement.

21 Q. Is it also your understanding that at times under
22 investigation in this case, Feeding Our Future used those
23 rosters?

24 A. Yes, Feeding Our Future collected those rosters to
25 substantiate the claims that they were submitting for

1 reimbursement. Those were one piece of the plethora of
2 documents that they had sites submit to them to show that
3 the claims that they were submitting for reimbursement were
4 in fact real and legitimate claims of meals that were fed to
5 real kids throughout the state of Minnesota.

6 Q. And you testified about this earlier. We have heard a
7 lot about it.

8 Do you believe that the claims submitted by
9 Feeding Our Future were in fact real, fed to real kids, and
10 deserving of reimbursement under the --

11 A. No, I do not.

12 Q. Is that what the evidence suggests?

13 A. It does not.

14 Q. Let me show -- my apologies. Just for the witness, Your
15 Honor.

16 Let me show you Government A82. All right.
17 Special Agent Wilmer, do you see an email I pulled up in
18 front of you?

19 A. I do.

20 Q. Do you recognize it as one that law enforcement obtained
21 from a search warrant?

22 A. Yes, I do.

23 MR. BOBIER: Your Honor, move the admission of
24 Government's A82.

25 THE COURT: Any objection? A82, any objection?

1 MR. UDOIBOK: No objection.

2 MR. MONTEZ: No objection.

3 THE COURT: A82 is admitted.

4 MR. BOBIER: Thank you, Your Honor.

5 BY MR. BOBIER:

6 Q. All right. Special Agent Wilmer, now that the jury can
7 see it, who is this email from?

8 A. This is an email from Aimee Bock to the Feeding Our
9 Future office staff, dated April 18th of 2021.

10 Q. The subject is Documents Back to the Office, in all
11 caps, Tomorrow; is that right?

12 A. That is correct.

13 Q. So in this April 2021 email that Aimee Bock seems to
14 send to the FOF office staff, she indicates that she's
15 working on collecting documents for MDE; is that right?

16 A. That is correct.

17 Q. Documents for the State?

18 A. That is what this appears to be for.

19 Q. The requested documents for MDE.

20 A. That is correct.

21 Q. Do you know anything about MDE requesting documents from
22 Feeding Our Future?

23 A. It's my understanding this is spring of 2021. This is
24 around the same time that there was a stop pay issued by MDE
25 and a dispute between MDE and Feeding Our Future as to

1 claims that it had submitted on behalf of their sites.

2 As part of that, there was additional
3 documentation that was requested to show that those claims
4 should in fact be paid.

5 Q. We heard some testimony from Ms. Honer about that; is
6 that right?

7 A. We did.

8 Q. Did she describe that request for documents from the
9 sponsor as a standard part of how MDE works with sponsors or
10 unique in this case to Feeding Our Future?

11 A. As we've seen throughout this trial and this
12 investigation, these sponsors are expected to review claims
13 for authenticity before submitting for reimbursement. As
14 part of that, it's their role and responsibility to collect
15 documents from the sites to support their claims.

16 And then it's also their role and responsibility
17 to hold onto those documents so that at any point in time if
18 MDE or other authorities want to review them, they can
19 obtain those documents from the sponsor they've collected
20 and held onto.

21 Q. And here we see, as you've testified, the MDE request
22 going to Feeding Our Future for all of those documents
23 supporting all of those claims; is that right?

24 A. Yes. This email appears to show that MDE has requested
25 documents and Ms. Bock is now reaching out to her staff to

1 make sure that they get those together so they can be
2 reviewed and submitted.

3 Q. And in Ms. Bock reaching out to her staff to get the
4 requested documents together for the State, she includes a
5 line here in all caps; is that right?

6 A. She does.

7 Q. And it reads, "If you have menus, receipts, meal counts,
8 attendance records, or any other docs at your home, please
9 return tomorrow."

10 Is that right?

11 A. That is what it reads.

12 Q. Are you familiar in this investigation with what
13 attendance records are in the context of claims submitted
14 for reimbursement?

15 A. I am. These are the document that would show the kids
16 who are attending the programs and receiving the meals that
17 are being provided by the sites that have then been
18 submitted for reimbursement from MDE.

19 Q. Attendance records like those rosters that Special Agent
20 Parks testified to at length?

21 A. Exactly like those.

22 Q. Okay. All right. So I'd like today to expand on some
23 of the things we've heard about already over the course of
24 the trial, and I want to start by looking at some materials
25 law enforcement seized from the devices belonging to the

1 defendants, from their phones.

2 A. Sounds good.

3 Q. Are you familiar at a high level with some of those
4 materials?

5 A. I am.

6 Q. Earlier this week we heard from FBI special agents who
7 explained search warrants had been executed at Ms. Bock's
8 home, correct?

9 A. Correct.

10 Q. And also at Mr. Salim Said's home?

11 A. That is correct.

12 Q. In January of 2022?

13 A. Correct.

14 Q. And those agents described that among other things
15 seized from both of those homes were some devices like
16 phones.

17 A. That is correct.

18 Q. Did you review those seized devices exhaustively?

19 A. I myself have not reviewed those seized devices
20 exhaustively.

21 Q. Have you yourself read every text on each of those
22 phones?

23 A. I have not.

24 Q. Have you looked at every saved document on each of those
25 phones?

1 A. I have not.

2 Q. On every record of every communication on each of those
3 phones?

4 A. I have not.

5 Q. But for the purpose of your testimony, have you reviewed
6 certain message communications found on those two phones?

7 A. Yes, amongst other things.

8 Q. Including certain documents saved down on one or more of
9 those phones; is that right?

10 A. That is correct.

11 Q. Let me show you what is in evidence as Government's
12 BB30a.

13 All right. Is this a text message or a message
14 communication we're looking at?

15 A. It is.

16 Q. All right. I want to break this down because they are
17 not always produced very intuitively. What do we see at the
18 top of BB30a?

19 A. These are the individuals that the text communication is
20 between. Phone number ending in 2480 and a phone number
21 ending in 8354.

22 Q. And the 2480 number, do you know whose number that is?

23 A. Aimee Bock.

24 Q. The number ending in 8354, do you know whose number that
25 is?

1 A. Salim Said.

2 Q. Can you explain to the jury why above Salim Said's phone
3 number instead of his name it just says Safari?

4 A. This text communication was pulled from Aimee Bock's
5 phone, and that is the name that that number corresponds to
6 in her phone, similar to if you might save a cell phone
7 number of your parent as mom or dad as opposed to their
8 name, that's what we see here.

9 Q. So as evidenced by this record, at least at this time,
10 in Aimee Bock's phone the number for Salim Said was saved to
11 Safari?

12 A. That's correct.

13 Q. And as we're going through these messages, we're going
14 to consistently see little circles on the left and right
15 margins of these communications?

16 A. Correct. And that indicates who that particular portion
17 of the message is from, AB meaning Aimee Bock and S meaning
18 Safari. In this case that is Salim Said.

19 Q. So in this thread, AB are the communications on the
20 right, and Salim Said's are the communications on the left?

21 A. That's correct.

22 Q. Now in this communication, it's dated May of 2021; is
23 that right?

24 A. Correct, May 19th of 2021.

25 Q. And it looks like Aimee Bock sends an attachment with an

1 image to Salim Said; is that right?

2 A. That is correct.

3 Q. On the next page, is this just a zoom-in of that same
4 attachment?

5 A. Yes, the upper portion of the next page is that first
6 image attachment that you see on the previous page.

7 Q. Now, the text message we were looking at was from
8 May 19; is that right?

9 A. That is correct.

10 Q. And if we look at the image Aimee Bock sent, what do we
11 see?

12 A. These are two separate checks, both dated May 19th of
13 2021 from Feeding Our Future to Stigma-Free International
14 Incorporated.

15 Q. How big are these checks?

16 A. I would consider them very big.

17 Q. Each over a million dollars?

18 A. That is correct.

19 Q. Each with the date, May 19th?

20 A. That is correct.

21 Q. We've heard about Stigma-Free International at some
22 length in this trial; is that right?

23 A. Yes, we have.

24 Q. Can you remind us at a high level what Stigma-Free
25 International is?

1 A. Stigma-Free International is a nonprofit that was
2 acquired by some of the defendants in this case when there
3 was a change in the rules from MDE that then prohibited
4 for-profit restaurants operating food sites.

5 And so they acquired a nonprofit, which then
6 enabled them to create a franchise model within the Safari
7 Group for additional food sites to continue to operate.

8 Q. And can you remind us what Salim Said's connection is to
9 Stigma-Free International?

10 A. He benefits financially from all the sites that operate
11 under the Stigma-Free International umbrella and also plays
12 a role in recruiting and completing paperwork for those
13 sites.

14 Q. When you say Salim Said benefits financially, you mean
15 he gets money from Stigma-Free?

16 A. From the sites underneath it, yes.

17 Q. And the jury will hear a lot about that from our
18 forensic accountants later; is that right?

19 A. They will.

20 Q. Do you know, Special Agent Wilmer, which Stigma-Free
21 site these checks are reimbursing?

22 A. These are for Stigma-Free International, Willmar and
23 Stigma-Free International, Mankato, two of the sites we've
24 heard about previously in this trial.

25 Q. About a million plus to each on the same day?

1 A. That is correct.

2 Q. Do you know whether these check were deposited by
3 Stigma-Free?

4 A. They were. They were both deposited into the same
5 Stigma-Free International bank account.

6 Q. As I pull up what's in evidence as W12 at page 30, is
7 this the Stigma-Free International account at Bank of
8 America?

9 A. Yes, this is a portion of the bank records for that
10 account.

11 Q. One of the check numbers, just looking at it here, I'll
12 go down a few pages for you. How about that, Special Agent
13 Wilmer?

14 We're crooked, which I might be able to fix, but
15 as I'm working on it, do you recognize that image?

16 A. I do. It's the same check, one of the same checks we
17 just saw in the previous text communication.

18 Q. The same image that Aimee Bock texted to Salim Said the
19 same day the check was cut?

20 A. That's correct.

21 Q. And if I go down to page 142 of the same exhibit and we
22 rotate it to make it viewable, is that the other check?

23 A. It is.

24 Q. Actually deposited?

25 A. Yes.

1 Q. Actually paid?

2 A. Yes.

3 Q. Did that text, Aimee Bock sending texts of checks
4 written to Stigma-Free International the day they were cut
5 to Salim Said, did that signify anything to you in the
6 investigation?

7 A. It did. It further corroborates what we've heard from
8 multiple witnesses for these various sites that when it was
9 time for those sites to receive the reimbursement funds, it
10 wasn't come from Feeding Our Future.

11 Although that's the source of the funds, they
12 would be contacted by Salim Said or others within that tight
13 group, and then they'd be notified their check was ready
14 from him, and then they would go to the Park location to
15 pick it up.

16 Q. And did the text we were looking at signify anything to
17 you about the coordination or lack of coordination between
18 Aimee Bock and Salim Said on a daily basis?

19 A. It shows that there's coordination between the two.
20 Immediately upon the checks being ready, he's notified of
21 such.

22 Q. You said at the beginning, you also looked at some
23 documents that were saved on the phones of at least
24 Mr. Salim Said; is that right?

25 A. That's correct.

1 Q. Can you describe what we're talking about when I say a
2 document saved on the phone?

3 A. Yeah. So these are not necessarily from, pulled
4 directly from the texts, but rather documents that have been
5 saved to the phone. Whether they originally came from text,
6 email or other methods, they were saved to the actual
7 storage on his digital device.

8 Many of those documents on his phone were images
9 of checks similar to the once we saw before.

10 Q. Let me show you what's in evidence as GG32. Is this one
11 of those documents?

12 A. It is.

13 Q. Saved on Mr. Salim Said's phone?

14 A. That is correct.

15 Q. One of the checks?

16 A. Yes. This is an unsigned check from Cosmopolitan
17 Business Solutions LLC to Eidleh Inc.

18 Q. Remind us who Eidleh is.

19 A. Abdikerm Eidleh was an employee of Feeding Our Future
20 who assisted in recruiting sites and solicited numerous
21 kickbacks from numerous sites, as we have heard from witness
22 testimony and we will see from continuous bank records.

23 Q. Now, you mentioned it's an unsigned check. I'll note
24 for you that the date is July 28th, 2020. Do you see that?

25 A. That is correct.

1 Q. If I show you Government's Z16, which is in evidence,
2 same check but signed?

3 A. That is correct.

4 Q. From your background and the investigation, do you have
5 an understanding of what this check is going from
6 Cosmopolitan Business Solutions d/b/a Safari to Eidleh?

7 A. This is a kickback payment that's signed by Salim Said
8 and is charged as one of the counts in this investigation.

9 MR. MONTEZ: Objection, Your Honor. Calls for
10 legal conclusion.

11 THE COURT: Overruled.

12 BY MR. BOBIER:

13 Q. That's the type of evidence we've heard in this case so
14 far; is that right, Special Agent Wilmer?

15 A. We have.

16 Q. Have we heard any other evidence in this case about
17 kickbacks being paid from operators of sites to Feeding Our
18 Future employees like Eidleh?

19 A. We have. As recently as earlier today with Mr. Hussein.
20 We've heard from numerous witness, numerous sites, that
21 there were multiple Feeding Our Future employees who
22 solicited and received kickbacks from the sites that were
23 operating under the sponsorship of Feeding Our Future.

24 Q. Including, we heard this morning from Mr. Hussein that
25 he paid kickbacks to Aimee Bock?

1 A. To Aimee Bock and to Eidleh.

2 Q. We heard at the beginning of the trial from Ms. Lull Ali
3 who is Mohamed Hussein's wife; is that right?

4 A. That's correct.

5 Q. Did we hear something about kickbacks from her?

6 A. Just like her husband, she also paid kickbacks to Aimee
7 Bock and Eidleh.

8 Q. That was her testimony?

9 A. That was her testimony.

10 Q. We also heard from Hanna Marekegn in the trial. Do you
11 remember that testimony?

12 A. I do. She repeatedly paid kickbacks to Eidleh. She
13 informed Ms. Bock that she had paid those kickbacks, and
14 then at a later date Ms. Bock solicited a kickback from her,
15 according to her testimony.

16 Q. And beyond those three witnesses you've just described,
17 have we heard still more evidence in this trial about
18 kickbacks either paid to or solicited by Feeding Our Future
19 employees?

20 A. We have.

21 Q. Including Ms. Bock?

22 A. That's correct.

23 Q. Payments solicited from site operators; is that right?

24 A. That is correct.

25 Q. We heard earlier in the trial from a man named Awale; is

1 that right?

2 A. Yes, Abdulkadir Awale.

3 Q. And what was his testimony with respect to kickbacks?

4 A. His testimony was that for his participation of his
5 several sites that he had within the food program under the
6 sponsorship of Feeding Our Future, he had to pay kickbacks
7 to Idleh, and he also was requested to cut a check to
8 Ms. Bock's benefit.

9 Q. And according to Mr. Awale's testimony, did Mr. Awale
10 cut that check as requested to Ms. Bock's benefit?

11 A. He did.

12 Q. Why do you say, "To Ms. Bock's benefit"?

13 A. He was directed not to make the check out to her
14 individually but to a company to assist her.

15 Q. I'm going to show you W45, which is in evidence. This
16 is a Bank of America account for something called School Age
17 Consultants.

18 Do you see that?

19 A. I do.

20 Q. Who's the account owner there?

21 A. It's Aimee Marie Bock.

22 Q. If I go down to page 42, here's just one check of about
23 almost \$3,000 going to School Age Consultants?

24 Do you see that?

25 A. I do.

1 Q. Can you remind us what School Age Consultants is?

2 A. School Age Consultants is an entity that was created,
3 set up by Ms. Bock in December of 2021 and funded almost
4 entirely by checks extremely similar to the one we see here,
5 most of which in the same payment amount, including from
6 Mr. Awale, according to his testimony, all participants
7 within the food program.

8 However, these funds were not used to purchase
9 food for children or other related materials.

10 Q. You say, "Including Mr. Awale." If I show you page 56
11 of the same exhibit, we see another check in the same amount
12 \$2,800 to School Age Consultants. This one from Sambusa
13 King?

14 A. That is correct.

15 Q. What is Sambusa King?

16 A. Sambusa King located at that address in Hopkins,
17 Minnesota, is one of the businesses that Mr. Awale owned and
18 operated and was used for his participation within the food
19 program under the sponsorship of Feeding Our Future.

20 Q. That's the check, one of the checks that he testified
21 about; is that right?

22 A. That is correct.

23 Q. All right. Special Agent Wilmer, continuing on about
24 the evidence we've heard in this case concerning the degree
25 to which Mr. Salim Said was involved in the food program.

1 Have we heard any evidence in the case about the
2 use of shell companies?

3 A. We have.

4 Q. Can you remind us what we've heard?

5 A. Well, as one example, Mr. Sharmake Jama from Brava
6 Restaurant in Rochester according to his testimony was
7 directed or instructed by Mr. Said, as well as others, to
8 create shell companies for himself and his family members
9 through which they could receive and then use the proceeds
10 from their participation within the food scheme, food
11 program.

12 Q. According to Sharmake Jama who testified, his use of
13 shell companies was directed by Mr. Salim Said; is that
14 right?

15 A. That is correct.

16 Q. Did you find any documents saved on Mr. Said's phone
17 related to the creation of shell companies?

18 A. I did. Amongst the documents saved to his phone are
19 essentially screen grabs or images showing payment
20 confirmations for when the filings were completed with the
21 Minnesota Secretary of State for those six shell companies
22 for the six siblings of the Jama family.

23 Q. Pull up G33. Sorry. GG33, which is in evidence.

24 Do you see that?

25 A. I do.

1 Q. Is that one of the confirmations you were just
2 describing?

3 A. It is.

4 Q. Was this found as a saved document on Mr. Said's phone?

5 A. It was.

6 Q. Now, you described this a bit. Now that the jury can
7 now see it in front of them, can you tell us what we're
8 looking at here?

9 A. Yeah. So when you register a business with the
10 Minnesota Secretary of State, there is a fee that's
11 required. And like many fees for things of importance, you
12 are issued a confirmation.

13 In this case, it's showing the confirmation with
14 the confirm nation number from the Secretary of State, the
15 payment amount that was given, as well as the date and then
16 confirmation that the status of that is now processed.

17 Q. So this confirmation, as you understand it, is a receipt
18 for someone having paid the registration fee with the
19 Minnesota Secretary of State for the creation of a new
20 entity; is that right?

21 A. That is correct.

22 Q. Under payment method, we see some information; is that
23 right?

24 A. That is correct.

25 Q. What is the account nickname?

1 A. Salim Said-Blackie.

2 Q. We heard Blackie is a nickname for Mr. Said; is that
3 right?

4 A. That is correct.

5 Q. I notice that the payer name isn't Salim Said. It's
6 something else.

7 A. That is correct. The payer name is associated with the
8 same email you see listed below, and that is an attorney
9 that assisted, purportedly assisted, with completing this
10 payment.

11 Q. All right. But to be clear, does the investigation, has
12 the investigation determined who actually made this payment?

13 A. Correct. The card number you see there is a Discover
14 credit card, and the sole signatory on that is Salim Said.

15 Q. You said there were a few of these on Mr. Said's phone;
16 is that right?

17 A. There were.

18 Q. GG34, another payment by Mr. Said for the creation of a
19 new entity with the Minnesota Secretary of State; is that
20 right?

21 A. That is correct. There was six in total, all on that
22 same date, which corroborates the testimony of Mr. Jama that
23 all were created on the same date by Salim Said.

24 Q. Now, GG35, 36 and on, those are all confirmations saved
25 down on Mr. Said's phone that you've just described; is that

1 right?

2 A. That is correct.

3 Q. Has the investigation been able to determine which
4 entities those registration payments on Mr. Said's phone
5 corresponded to?

6 A. We have. They correspond to the six shells that the
7 Jama family created, including Mumu LLC, which was Sharmake
8 Jama. Nukamad LLC as an example was one belonging to his
9 brother Mustafa.

10 Q. If I can pull up just for the witness Exhibit T91, do
11 you see an email in front of you?

12 A. I do.

13 Q. Is it one law enforcement obtained via a search warrant?

14 A. That is correct.

15 MR. BOBIER: Your Honor, the government moves to
16 admit T91.

17 MR. UDOIBOK: No objection.

18 MR. MONTEZ: No objection.

19 THE COURT: T91 is admitted.

20 BY MR. BOBIER:

21 Q. And, Special Agent Wilmer, I will pull up next to T91
22 Government's GG36.

23 All right. Government's GG36, that's one of those
24 confirmations we were just discussing that was found on
25 Mr. Said's phone; is that right?

1 A. That is correct.

2 Q. And over here in T91, we see discussion of Nukumad LLC.

3 A. That's correct.

4 Q. Will you remind us what Nukumad LLC is?

5 A. Nukumad LLC is one of those shell companies in this case
6 created for Mustafa Jama, one of the Jama siblings, to
7 receive and then use the proceeds from the participation of
8 Brava Restaurant in the Federal Child Nutrition Program.

9 THE COURT: Mr. Bobier, is this in evidence?

10 MR. BOBIER: Your Honor, didn't I just move the
11 admission of T91?

12 THE COURT: We're now on GG36.

13 MR. BOBIER: I believe GG36 has been admitted,
14 Your Honor, yes.

15 THE COURT: Just one minute.

16 Yes?

17 MR. BOBIER: I'm told yes, but I'm happy to move
18 the admission now, Your Honor.

19 THE COURT: All right. Is there any objection to
20 GG36?

21 MR. BOBIER: I'll pull it up so counsel can see
22 it.

23 MR. UDOIBOK: No objection.

24 THE COURT: I think we just have a discrepancy
25 there, and that may be our error.

1 All right. I hear no objection. GG36 is
2 admitted, and we will reconcile at the end of the day or the
3 end of the week.

4 Thank you. Go ahead.

5 MR. BOBIER: Thank you, Your Honor.

6 BY MR. BOBIER:

7 Q. To put a fine point on it, Special Agent Wilmer, we saw
8 those confirmations. Remind us what the testimony was from
9 Sharmake Jama about where he and each of his family members
10 got the companies that they used to participate in the
11 federal food program?

12 A. They were directed by Mr. Said to create shells for the
13 proceeds that they receive as part of Brava Restaurant's
14 participation in the Federal Child Nutrition Program under
15 the sponsorship of Feeding Our Future. Those entities were
16 registered by Mr. Said all on the same day, and then they
17 were used as such.

18 Q. And what was the word when Mr. Jama testified that he
19 used to describe those entities that he said Mr. Said set up
20 for him and for his family?

21 A. He called them shells.

22 Q. Were there any other entities that the investigation was
23 able to determine were set up via registration fees paid for
24 by Mr. Said?

25 A. Yes, there were.

1 Q. Have you heard the company Victory LLC?

2 A. I have.

3 Q. When did we hear Victory LLC in this trial?

4 A. We heard previous testimony from a Bridgewater Bank
5 representative. Victory LLC was the first company that
6 caught their attention and led to them investigating other
7 accounts controlled by Mr. Said at their banking
8 institution.

9 Q. Just for the witness, I pull call up Government's T70.

10 Is that a Minnesota SOS record?

11 A. It is.

12 Q. Obtained via grand jury subpoena?

13 A. That is correct.

14 MR. BOBIER: Your Honor, we'd move to admit T70.

15 THE COURT: Any objection?

16 MR. UDOIBOK: No objection.

17 MR. MONTEZ: No objection.

18 THE COURT: T70 is admitted.

19 MR. BOBIER: All right. Special Agent Wilmer, we
20 heard from that Bridgewater representative Ms. Shipman; is
21 that right?

22 THE WITNESS: That is correct.

23 BY MR. BOBIER:

24 Q. And the bank's investigation identified that Victory LLC
25 was associated with several accounts; is that right?

1 A. That is correct.

2 Q. Whose accounts?

3 A. Salim Said's.

4 Q. What was the conclusion of the investigation undertaken
5 by Ms. Shipman and her team at Bridgewater Bank with respect
6 to Mr. Said's accounts?

7 A. After just a couple months of investigation, they deemed
8 that the accounts were not being used for legitimate
9 business, and all were closed.

10 Q. Let's talk about rosters. When you were looking at the
11 documents saved down on Mr. Said's phone, did you see any
12 rosters?

13 A. I did.

14 Q. The type of rosters we've been discussing throughout the
15 trial?

16 A. Yes.

17 Q. Remind us. You mentioned Sharmake Jama. What was his
18 testimony about what he was instructed by Mr. Said to do
19 with the rosters and all the paperwork for his site?

20 A. He traveled to what he referred to as Safari. That
21 began as a restaurant and then became the 2722 Park Avenue
22 location, and that is where he turned in meal counts and
23 other associated paperwork he had for the Brava Restaurant
24 site.

25 Q. Let me show you what's in evidence as GG39. Do you

1 recognize this?

2 A. I do.

3 Q. Is that one of the rosters found saved as a document on
4 Mr. Said's phone?

5 A. Yes, it is.

6 Q. It's got Feeding Our Future at the top?

7 A. It does.

8 Q. And what site is this for?

9 A. This is for Stigma-Free International, Willmar.

10 Q. Can you remind us what Tunyar Trading is?

11 A. Tunyar Trading is the purported vendor for that site
12 associated with another defendant in this case.

13 Q. When we go down in this document, same sort of stuff the
14 jury saw with Special Agent Parks day after day, name after
15 name, for pages; is that right?

16 A. Yes.

17 Q. Pretty remarkable consistent attendance too; is that
18 right?

19 A. That is correct.

20 Q. All right. Special Agent Wilmer, this roster was found
21 on Mr. Said's phone, but does the investigation have any
22 evidence whether it was submitted to Feeding Our Future?

23 A. Yes. The same roster was found in the files that were
24 seized from Feeding Our Future upon the execution of the
25 search warrant, showing that it had been submitted, received

1 and stored by Feeding Our Future.

2 Q. So, for example, if I pull up what we were just looking
3 at in Government's GG39, and we compare it to what is in
4 evidence as Government's G50, Government's G50 is --

5 Let me ask you. Where did we get that?

6 A. This is a paper, a scanned copy of paper documents that
7 were obtained via search warrant at the Feeding Our Future
8 office on January 20th of 2022.

9 Q. And if we look at some comparisons, for example, could
10 you read us the first name in each respective row?

11 A. It is Naima Yusuf, age eight, on both documents.

12 Q. Same attendance marked for that supposed person on each;
13 is that right?

14 A. Correct.

15 Q. And you've looked at these. Can you tell us what the
16 comparison you have done told you?

17 A. It shows that these are the same roster.

18 Q. All right. To be clear, GG39, roster found saved on
19 Mr. Said's phone, correct?

20 A. That is correct.

21 Q. GG50 at page 3, the exact same document found in paper
22 form by law enforcement at Feeding Our Future?

23 A. That is correct.

24 Q. What did that indicate to you in the investigation?

25 A. It indicates to us that Salim Said didn't just benefit

1 financially from these sites but he played a hand in
2 ensuring that, having an active role in the participation
3 within the food program. He has the exact same roster saved
4 to his phone that was submitted to support the fraudulent
5 claims for that site.

6 Q. And to be clear, when you looked at Mr. Said's phone,
7 was this Willmar roster the only roster you found saved on
8 his phone?

9 A. It was not.

10 Q. There are several others?

11 A. There were.

12 Q. Did you do a spot check to see if those were also found
13 in paper form at Feeding Our Future?

14 A. We did.

15 Q. And what was the conclusion?

16 A. That those also were found at the Feeding Our Future
17 office, showing that they had in fact been submitted and
18 retained to support claims submitted to Feeding Our Future
19 for reimbursement.

20 Q. Did that further support the conclusion you just
21 described, that Mr. Said was actively involved in the
22 management of the sites?

23 A. It did.

24 Q. In the Safari Group?

25 A. That's correct.

1 MR. MONTEZ: Objection, Your Honor. Calls for
2 speculation.

3 THE COURT: Overruled. The answer will stand.

4 BY MR. BOBIER:

5 Q. Did you find anything else in your review of these
6 devices, informing your view of the degree to which Mr. Said
7 was involved in the operations of the food sites?

8 A. We did.

9 Q. Including content found in messages?

10 A. That's correct.

11 Q. Let me show you what's in evidence as BB30d. Another
12 communication; is that right?

13 A. That's correct.

14 Q. This one from whose phone?

15 A. Again, this is a portion of a text communication between
16 phone number ending in 2480 identified as Aimee Bock and a
17 phone number ending in 8354 which belongs to Salim Said,
18 here labeled as Safari.

19 Q. All right. Another communication between numbers for
20 Aimee Bock and Salim Said?

21 A. That's correct.

22 Q. The date on this one is November 2021; is that right?

23 A. That is correct.

24 Q. And what does Mr. Said say in this text communication to
25 Aimee Bock?

1 A. "Aimee, any checks for ASA summer, Olive Management
2 after-school, Stigma-Free, Brava summer."

3 Q. Remind us what ASA is?

4 A. ASA is a food site with the location in St. Paul
5 belonging to Abdihakim Ahmed, Salim Said and another
6 gentleman.

7 Q. One of Salim Said's sites?

8 A. Correct.

9 Q. Is Olive Management one of the sites in the Safari
10 Group?

11 A. It is. It's one of the ones that existed at the Hormud
12 Grocery there in St. Cloud next to Harbor Freight that we
13 discussed last week.

14 Q. You told us the Stigma-Free sites are associated with
15 Mr. Said, that he got money from them, right?

16 A. That is correct.

17 Q. And Brava, remind us what Brava is in the Safari Group?

18 A. Brava Restaurant, located in Rochester, operated by the
19 Jama family.

20 Q. So if I pull up on the other side of the page what is in
21 evidence as FF2, the 229th page, we've seen this document
22 before, right?

23 A. Yes, we have.

24 Q. Obtained via search warrant?

25 A. Yes. This one was a search warrant at the Park Avenue

1 location.

2 Q. And it identifies some of the entities in the Safari
3 Group; is that right?

4 A. That is correct.

5 Q. Remind us what the Park Ave location is where this
6 document was found?

7 A. That is the mansion turned into business space that was
8 purchased by the same individuals that operated these sites.

9 Q. Is that what we heard from Farhiyo Moalim, perhaps
10 yesterday, as the location of Total Financial Solutions?

11 A. Correct. After they purchased that building, that's
12 where that business moved, into one of the suites there, and
13 that's where she worked.

14 Q. And I can highlight some of them, but simply put, do we
15 see on this list of sites under the Safari Group found at
16 the Park Avenue location each of the sites identified in
17 Mr. Said's text where he's asking Aimee where the checks
18 are?

19 A. That is correct.

20 Q. All right. Special Agent Wilmer, to what extent did you
21 review the text communications found on these devices
22 between Aimee Bock and Salim said?

23 A. Not an exhaustive review, but I have reviewed some text
24 communications between those parties.

25 Q. And to the extent you've reviewed them, I imagine the

1 core of your review focused on the time frame under
2 investigation, meaning when the food program was operating
3 after COVID?

4 A. That's correct.

5 Q. During your review of those messages, how many
6 communications did you find between Ms. Bock and Mr. Said
7 concerning providing food to children?

8 A. Extremely few.

9 Q. How many communications did you find between Ms. Bock
10 and Mr. Said concerning the resources needed to do that, to
11 feed real children?

12 A. Again, extremely few.

13 Q. How about communications about getting a fleet of trucks
14 to make sure they could deliver food to real children?

15 A. Again, extremely few.

16 Q. How many communications between Ms. Bock and Mr. Said
17 did you see just in your review concerning the availability
18 of checks?

19 A. Numerous.

20 Q. The availability of claim payouts from Feeding Our
21 Future?

22 A. Very frequent.

23 Q. About getting paid?

24 A. That seemed to be the main focus.

25 Q. You also talked about docs from Mr. Said's phone that

1 were saved down; is that right?

2 A. That is correct.

3 Q. How many of those did you look at?

4 A. There's 950 I believe saved, not exhaustively but spot
5 checked through the entire list.

6 Q. Through the entire list?

7 A. That's correct.

8 Q. And as you were doing that spot check, how many
9 documents that you reviewed saved down on Mr. Said's phone
10 had to do with feeding kids?

11 A. Not that many.

12 Q. With an operational strategy to make sure they could get
13 real food into the hands of real children?

14 A. Very few.

15 Q. How many were checks?

16 A. A great many of them.

17 Q. Majority of what you looked at, at least?

18 A. Yes.

19 Q. So far we've been looking at communications mostly from
20 Ms. Bock's phone; is that right?

21 A. That is correct.

22 Q. I want to show you a communication that is in evidence
23 as GG47a from Mr. Said's phone. All right.

24 All right. Same first step. Special
25 Agent Wilmer, could you tell us, please, who the

1 participants are on this thread from March of 2021?

2 A. Two phone numbers, one ending in 8354 to the same phone
3 number previously identified for Salim Said and another
4 number ending in 9030 here labeled Farhiyo Salah office.

5 Q. Okay. So the 8354 number, that's Salim Said?

6 A. That is correct.

7 Q. Whose phone is this message taken from?

8 A. Salim Said's.

9 Q. So the name there that's written instead of Salim Said,
10 where would that have come from?

11 A. From his own device.

12 Q. In my phone, it might say Dan Bobier instead of, you
13 know, Salim Said because I've chosen my name in my phone?

14 A. Generally a name selected by the user.

15 Q. Okay. Farhiyo Salah office, do you know whose phone
16 number that is?

17 A. My understanding is that's Farhiyo Moalim who we heard
18 from yesterday.

19 Q. The woman that worked at TFS, Total Financial Solutions?

20 A. That is correct.

21 Q. And worked with Mr. Said, to be clear?

22 A. Yes.

23 Q. And his partners in the Safari Group?

24 A. Yes, one of which is known as Salah.

25 Q. So in this text from March 2021 between Mr. Said and

1 Ms. Moalim, Mr. Said starts off with a few messages. Can
2 you tell us what those say?

3 A. Ama Green Market LLC, 73 10th Avenue South, Waite Park,
4 Minnesota, 56387, 3,000.

5 Q. Special Agent Wilmer, do you know what that address is?

6 A. I do. That is the address that was used for the
7 Stigma-Free International, Waite Park site. Green Market
8 being the preexisting business that exist at that location,
9 and again that location was used as a purported food
10 distribution site for Stigma-Free International, Waite Park.

11 Q. So when you say that 73 10th Ave South was the location
12 for the Stigma-Free site you are discussing, can you tell us
13 what you mean?

14 A. That is a, that address corresponds with a spot in a
15 small strip mall in Waite Park. At that specific address is
16 Green Market, which has existed since before the food
17 program and was also there during the time frame we're
18 looking at as part of this investigation.

19 However, at that same address where the Green
20 Market is is where the Stigma-Free International, Waite Park
21 site purported to exist and distribute food to children.

22 Q. So if we compare GG47a to I1, which is in evidence, do
23 you see the site ID request for Stigma-Free, Waite Park on
24 the second page of I1?

25 A. I do.

1 Q. Recognize the address?

2 A. Yes, this is the same as listed in a text communication.

3 Q. Do you have an understanding based on the investigation
4 of what Mr. Said is requesting Farhiyo Moalim to do here in
5 this text?

6 A. He's requesting for her to make a payment to the Green
7 Market, and he's giving her the amount.

8 Q. The amount there at the bottom is 10,000?

9 A. That's correct.

10 Q. Do you have an understanding of why Mr. Salim might want
11 to cut a \$10,000 check to Ama Green Market, which is the
12 physical building at the location for the Stigma-Free
13 International, Waite Park site?

14 A. Yes. As you've heard several times in this trial and
15 through various testimony, the, these are entities that were
16 just created usually within weeks of purportedly operating
17 at sites to distribute food to children.

18 Therefore, they didn't have a brick and mortar
19 building that was theirs and frequently would use an address
20 for a preexisting business and then pay that business
21 usually large dollar amounts to be allowed to use their
22 storefront as part of their facade for the food site.

23 This is the same what we saw with the FaaFan
24 Restaurant in Willmar, which received upwards of \$40,000 a
25 month, and now we're seeing it with Green Market for Waite

1 Park.

2 Q. So Stigma-Free International, no physical operations?

3 A. Correct.

4 Q. But Mr. Said is using Stigma-Free International with his
5 Safari Group partners to operate a Waite Park site; is that
6 correct?

7 A. That's correct.

8 Q. So they need a place to do it?

9 A. Correct.

10 Q. So they pay Ama Green Market. Is that what you are
11 explaining?

12 A. Yes.

13 Q. \$10,000?

14 A. Correct.

15 Q. It's like a rent payment?

16 A. Yes.

17 Q. Is it your understanding that this \$10,000 that Mr. Said
18 asked to be cut March of 2021, is it your understanding it
19 was actually paid?

20 A. It is.

21 Q. So if I show you what's in evidence as W25, we see the
22 bank records for Salim Limited. What do we see there?

23 A. This is a check from Salim Limited LLC to Ama Green
24 Market LLC, dated March 16th of 2021 in the amount of
25 \$10,000.

1 Q. Same entity Salim texted about; is that right?

2 A. That is correct.

3 Q. Same amount Salim Said texted about?

4 A. That is correct.

5 Q. Same day?

6 A. It is.

7 Q. And you mentioned FaaFan Restaurant. Is this set up
8 where one of the defendants entities would make a payment to
9 a brick and mortar restaurant in a town consistent in terms
10 of the practice with how many of these other sites were
11 operated?

12 A. It is. We see the same thing at Waite Park, Willmar,
13 Mankato, St. Cloud.

14 Q. Do you know whether -- let me ask you this: Is it your
15 understanding that the payment to Ama that we just discussed
16 was legitimate?

17 What was the purpose of the payment is your
18 understanding?

19 A. The purpose of the payment was to be allowed to use
20 their storefront to give legitimacy to the food site. In
21 order to have a food site that distributes thousands of
22 meals purportedly a day, it makes sense that you would have
23 a storefront to do it, from and therefore you have to have a
24 business to operate from a physical location.

25 MR. MONTEZ: Objection. Lack of foundation.

1 THE COURT: Overruled.

2 MR. MONTEZ: May we have a sidebar, Your Honor?

3 THE COURT: You may.

4 **(Sidebar discussion)**

5 THE COURT: Mr. Montez.

6 MR. MONTEZ: Your Honor, the witness's testimony
7 was that this \$10,000 payment was consistent with payments
8 that were made to similar sites, but there has not any
9 foundation that this witness has direct knowledge that this
10 \$10,000 was such a payment.

11 And so for him to testify that this was paid to
12 that storefront as a money to front their business out of
13 their, there is no foundation for that testimony.

14 THE COURT: Mr. Bobier.

15 MR. BOBIER: I'm happy to lay more foundation,
16 Your Honor. The agent has plenty of basis for this
17 understanding, and I'm happy to lay more of that if it will
18 satisfy the answer.

19 THE COURT: What is the basis that you are
20 anticipating?

21 MR. BOBIER: A few things. One is the consistency
22 of the operations. We've heard throughout the trial that
23 Stigma-Free was set up by Mr. Said and his partners in the
24 group as a franchise model.

25 The reason it was able to be so successful is,

1 they came up with one pattern for a site to fit, and they
2 iterated it at sites all throughout the state.

3 The agent brought up Faafan because that's just
4 yet another example of what we have seen of where a brick
5 and mortar store is paid an exorbitant amount of money, 30
6 or 40 grand a month, solely for the privilege of being able
7 to be the facade or a faux site is operated.

8 There are also witness interviews that further
9 establish that, but he doesn't have to. Your Honor, if the
10 concern is a descriptive one, he doesn't need to use the
11 word "front." He can just describe the location of the
12 site.

13 THE COURT: Mr. Montez.

14 MR. MONTEZ: I'm fine with that, but the witness's
15 last statement was that this payment was for a front. I
16 would ask that the court instruct the jury to disregard that
17 conclusion.

18 THE COURT: I will.

19 And I would like you to rephrase, Mr. Bobier, to
20 avoid the conclusory statements that tend to be legal
21 conclusions.

22 Mr. Montez, one of the reasons that I overruled
23 your objection was because it came to the testimony and not
24 to the question, and so I think the motion to strike is the
25 better avenue.

1 So, Mr. Bobier, if you could steer the agent away
2 from making what come close to legal conclusions, that's a
3 better, I think that we're going to be fine there.

4 You mentioned "franchise model." Can you remind
5 the court who used the term "franchise model"?

6 MR. BOBIER: I don't immediately have it tip of
7 mind, Your Honor. I know that this agent has not yet said
8 it, but I also haven't elicited that in a question.

9 MR. MONTEZ: Quite frankly, Judge, these have been
10 arguments that have been drawn out through a conclusory
11 statement by the government repeatedly. I don't know any
12 witness that has said something to that effect.

13 THE COURT: Okay. So we're going to avoid that.

14 MR. BOBIER: Understood. Oh, Your Honor, if I
15 may? I'm really sorry. If.

16 The agent, if that were to be the agent's
17 testimony now, is that permissible or, would you prefer, are
18 you directing me to try not to let the agent say even
19 franchise model, if that is his understanding from the
20 investigation? That's not a legal conclusion, Your Honor.
21 It's descriptive.

22 THE COURT: Mr. Montez.

23 MR. MONTEZ: Respectfully, Your Honor, this is the
24 exact type of argument that defense counsel earlier was
25 making, drawing conclusions through a statement made to the

1 witness.

2 There is no foundation for that. Therefore, it is
3 simply an argument and a conclusion.

4 THE COURT: Let's see where we go with it. Lay it
5 brick by brick, and we will see. I don't think the
6 franchise model is a legal conclusion.

7 I'm not as concerned about that as I am about the
8 term "front." I'm going to strike his earlier statement.

9 **(In open court)**

10 THE COURT: Members of the jury, the earlier
11 answer by the special agent is going to be stricken from the
12 record, and I'm going to ask Mr. Bobier to rephrase his
13 questioning, and we will go from there.

14 BY MR. BOBIER:

15 Q. All right. Special Agent Wilmer, a moment ago we were
16 talking about Stigma-Free International.

17 A. Yes.

18 Q. We've heard some testimony about Stigma-Free in this
19 case; is that right?

20 A. Yeah.

21 Q. We've seen many documents about what Stigma-Free was,
22 when it was started, when it was acquired by Mr. Said and
23 his partners in the Safari Group; is that right?

24 A. That's correct.

25 Q. Can you remind us how Stigma-Free operated multiple

1 sites throughout the state?

2 A. It was the nonprofit, and then for each site there was a
3 purported vendor underneath it, which was a for-profit
4 entity that purported to provide the meals distributed to
5 those children at those sites each month, month after month.

6 Q. And earlier you had been talking about the shell
7 companies, to use Sharmake Jama's word, and the evidence of
8 Mr. Said helping to create those, pay for the registration,
9 that evidence being found on his phone; is that right?

10 A. That's correct.

11 Q. Is it your understanding that any companies like that
12 were associated with each of the Stigma-Free sites?

13 A. That's correct. Each site had a particular individual
14 who established and then controlled the purported vendor
15 underneath it. For the example of Waite Park, there was a
16 company called Feeding Our Youth which was set up to be the
17 purported vendor that was set up and controlled by an
18 individual named Hamdi Omar.

19 However, the financial transactions of that
20 company show that it was not a legitimate food vendor in the
21 sense of the expenses do not show it was buying large
22 amounts of food month after month.

23 Q. So to meet Sharmake Jama's description like his
24 companies not spending money predominantly on food, right?

25 A. That's correct.

1 Q. On other things?

2 A. Correct.

3 Q. A shell?

4 A. A shell.

5 Q. So if I understand you, understand Stigma-Free, each
6 site had an operator?

7 A. Correct.

8 Q. Each site had a vendor that was set up for that site?

9 A. That's correct.

10 Q. Each site had a shell?

11 A. Correct.

12 Q. How would you describe that model for Stigma-Free?

13 A. A franchise model.

14 Q. Excuse me?

15 A. A franchise model.

16 Q. Was the franchise model successful for Mr. Said and his
17 partners?

18 A. They received a lot of money in a very short period of
19 time.

20 Q. Millions of dollars?

21 A. Millions of dollars.

22 Q. And the jury will hear a lot more about that from the
23 forensic accountants; is that right?

24 A. They will.

25 Q. I also want to ask you about a few purchases using the

1 food program money. Okay?

2 A. Okay.

3 Q. Did you find any communications in your review of
4 Mr. Salim Said's phone regarding purchases?

5 A. I did.

6 Q. Let me show you what's in evidence as GG50b.

7 Now, this, Special Agent Wilmer, is the first
8 communication that we've seen with three participants; is
9 that right?

10 A. That's correct.

11 Q. Who are the participants on this August 2021
12 communication found on Salim Said's phone?

13 A. Numbers ending in 0584, here labeled Abcoos. Number
14 ending in 8354 previously identified as Salim Said. And
15 number ending in 3417 here labeled as Fish.

16 Q. All right. So the middle number, that's Salim Said.
17 We've talked about that?

18 A. Correct.

19 Q. Remind us what testimony we have heard, including from
20 Mr. Moalim, as to who Fish is.

21 A. Abdulkadir Salah. Fish is a nickname that he commonly
22 went by.

23 Q. And who is Abdulkadir Salah with respect to this case?

24 A. He is a coowner of Safari, coowner of TFS, and involved
25 in the participation of the sites we've been discussing

1 within the sponsorship of Feeding Our Future.

2 Q. All right. So we've got two Safari Group members,

3 Mr. Said and Mr. Abdulkadir Salah who, is Fish?

4 A. Correct.

5 Q. Who is Abcoos?

6 A. Abcoos is understood to be is under Abdirahman Ahmed who
7 is understood to be another owner of Safari.

8 Q. And who is Abdirahman Ahmed?

9 A. Another owner of Safari.

10 Q. So let's see what these three individuals are talking
11 about. Abcoos opens this part of the thread says, "Closing
12 statement and money wiring instructions."

13 Right?

14 A. Correct.

15 Q. And then he sends a screenshot looks like, perhaps an
16 image. Can you summarize what we're seeing in this image
17 that Mr. Ahmed sends to the thread?

18 A. Yeah. These are, appears to be images of, image of
19 wiring instructions for a purchase closing, similar to what
20 you do when purchasing a house or commercial property.

21 Q. You see title Steward Company at the top?

22 A. I do.

23 Q. Does that further suggest to you this has to do with a
24 real estate transaction?

25 A. Yes.

1 Q. And then in the wire instructions, who is the buyer?

2 A. Afrikan Village LLC.

3 Q. Is that something you recognize from the investigation,
4 Afrikan Village?

5 A. It is.

6 Q. What's Afrikan Village LLC as far as you understand it?

7 A. This is an entity set up by Mr. Ahmed and used to
8 purchase a large commercial space in Ohio, and that purchase
9 was completed by the same three individuals listed on this
10 text communication.

11 Q. Now if I can show you a picture that is not yet in
12 evidence, it is Government's U10. Do you recognize that
13 photo, Special Agent Wilmer?

14 A. I do.

15 Q. Can you, you had just described the purchase of a
16 building related to Afrikan Village LLC. Is the photo I'm
17 showing you related to that?

18 A. Yes, that is the same location I was just referencing.

19 Q. And you recognize that as a true and accurate photo of
20 the image you were describing?

21 A. I do.

22 MR. BOBIER: Your Honor, move the admission of
23 U10.

24 THE COURT: Any objection?

25 MR. UDOIBOK: No objection.

1 MR. MONTEZ: No objection.

2 THE COURT: U10 is admitted.

3 BY MR. BOBIER:

4 Q. All right. So now that the jury can see this, Special
5 Agent Wilmer, we were looking at this text thread, three
6 members of the Safari Group including Salim Said.

7 And there was the discussion about a wire going
8 out from Afrikan Village LLC; is that right?

9 A. That is correct.

10 Q. Tell us, now that the jury can see it, what the image on
11 the right is showing?

12 A. This is a large commercial space that was previously a
13 culinary institute, as you can see by the writing on the top
14 of the building here. That was purchased using the Afrikan
15 Village LLC by the three individuals listed in the text
16 communication.

17 Q. When you say purchased using Afrikan Village LLC by
18 those three individuals, what do you mean?

19 A. Immediately after filing for the creation of the Afrikan
20 Village LLC, a bank account was opened under the same name.
21 Funds were then deposited into that bank account from these
22 three individuals, and then the funds in that bank account
23 were used to complete the purchase.

24 Q. Do you have any idea, based on the investigation, what
25 Mr. Said and his partners in this thread intended to do with

1 that property?

2 A. To make a for-profit center of some variety.

3 Q. So if we go lower in BB50 -- excuse me.

4 If we go lower in GG50b, the participants
5 exchanged some little images here; is that right?

6 A. That's correct.

7 Q. What do you understand those to be?

8 A. Image or a logo design for the center that they intend
9 to create at this new commercial space.

10 Q. They're making a logo?

11 A. Correct.

12 Q. For whatever they intend to put in this building; is
13 that right?

14 A. That is correct.

15 Q. If we go down a few more pages, see a few more images
16 shared in the thread; is that right?

17 A. That is correct.

18 Q. What do these appear to be so far as you understand
19 them?

20 A. My understanding is, this is a logo or advertisement
21 for, again, that same commercial space.

22 Q. It's like a mockup?

23 A. Right.

24 Q. Now, Special Agent Wilmer, was it your role in the
25 investigation to follow each of the dollars through the

1 defendants' accounts through Afrikan Village LLC and through
2 this wire?

3 A. No.

4 Q. That was somebody else's role in the investigation?

5 A. That is correct.

6 Q. But do you have an understanding at least as to where
7 most of the money discussed in this wire and going toward
8 the purchase of this defunct business in Ohio came from?

9 A. I do. The food program.

10 Q. Meant to feed kids?

11 A. Correct.

12 Q. All right.

13 Your Honor, if you're inclined to take an
14 afternoon break, now might be a great time?

15 THE COURT: If it's all right with everyone here,
16 we're going to go straight through to 3:30 and then end.

17 Is everybody okay?

18 MR. UDOIBOK: Yes, Your Honor.

19 MR. BOBIER: All right.

20 Special Agent Wilmer, I want to shift gears and
21 talk about something else.

22 We had just been looking at a text communication
23 taken from Mr. Said's phone; is that right?

24 THE WITNESS: That is correct.

25

1 BY MR. BOBIER:

2 Q. All right. I want to shift gears and talk about a
3 communication taken from Ms. Bock's. The other day we heard
4 some testimony about a rally held at MDE; is that right?

5 A. That is correct.

6 Q. Can you remind us what we heard about a rally held at
7 MDE?

8 A. Feeding Our Future employees and purportedly other
9 supporters rallied, and this is the same time in the spring
10 of 2021 when the stop pay was issued, and so there was
11 dispute between Feeding Our Future and MDE about approval
12 and -- of claims and reimbursement payments.

13 Q. And what was the nature -- I know you -- well, strike
14 that.

15 In a high level, what was the nature of the
16 dispute between Feeding Our Future and MDE generally around
17 that time?

18 A. That MDE had issued the stop payment because they had
19 concerns about claims that they were, that were being
20 submitted for reimbursement.

21 Q. Let me show you BB30b, which is in evidence. Another
22 text between Ms. Bock and Mr. Said; is that right?

23 A. That is correct.

24 Q. If you look at the second text here, that's from
25 Ms. Bock; is that right?

1 A. Yes, it is.

2 Q. And this is June of 2021. What's your understanding of
3 when that rally that we've heard about in this case so far
4 took place?

5 A. June of 2021.

6 Q. All right. So in this June 2021 text, what does
7 Ms. Bock tell Mr. Said?

8 A. "We are doing a rally at MDE parking lot Tuesday at 11.
9 It would be great if you guys came and brought people to
10 help keep the pressure on."

11 Q. "Keep the pressure on"?

12 A. That is what it says.

13 Q. Where's the rally?

14 A. MDE parking lot.

15 Q. And what did this email suggest, this communication
16 suggest to you, if anything, about who was setting up or
17 planning the rally?

18 A. That Ms. Bock played an active role in organizing that
19 rally.

20 Q. She says, "It would be great if you guys came," right?

21 A. Yeah, she does.

22 Q. And she's texting Salim Said?

23 A. Correct.

24 Q. Leader of the Safari Group?

25 A. Correct.

1 Q. Who has many sites operating under Feeding Our Future;
2 is that correct?

3 A. That is correct.

4 Q. And in fact, Ms. Bock sends a picture over to Mr. Said
5 on June, still in June of 2021. Do you see that on page 2?

6 A. I do.

7 Q. What are we looking at?

8 A. This appears to be a flyer or advertisement for a rally
9 for Feeding Our Future.

10 Q. See the Feeding Our Future emblem?

11 A. I do.

12 Q. Rally location, MDE; is that right?

13 A. That is correct.

14 Q. And the advertisement here is all caps, "We need the
15 food program. Every day that MDE waits to approve
16 applications, more kids go without food."

17 Is that right?

18 A. That is what's stated on it.

19 Q. And what else has been arranged for the rally? What's
20 the next text stay?

21 A. "Channel 5 is coming to the rally. Please remind
22 everyone to be here."

23 Q. Is that a news channel as far as you understand it?

24 A. That is my understanding.

25 Q. Get the word out?

1 A. Correct.

2 Q. Mr. Said responds, says, "Okay"?

3 A. Yes, he does.

4 Q. But however many people have agreed, signed on,
5 appeared, Aimee Bock says, "We need more people ASAP."

6 Is that right?

7 A. That is correct.

8 Q. Had Mr. Said, according to this message, appeared to
9 have helped populate that rally.

10 A. He sent a lot of people.

11 Q. To that rally to protest MDE?

12 A. That is my understanding what this means.

13 Q. After MDE implemented the stop pay; is that right?

14 A. That is correct.

15 Q. Because they had concerns, we've heard testimony, about
16 Feeding Our Future's conduct in the program?

17 A. That is correct.

18 Q. Ms. Bock in that message said, "Keep the pressure on."

19 Is that right?

20 A. That's correct.

21 Q. Have you seen any other examples from your work on the
22 investigation of Ms. Bock at Feeding Our Future trying to
23 keep the pressure on MDE?

24 A. I have.

25 Q. Can you describe some for us?

1 A. There is lengthy communications between Ms. Bock, as
2 well as the attorney for Feeding Our Future, and employees
3 of MDE regarding concerns, questions, scrutiny, things
4 related to Feeding Our Future sites.

5 Q. Now, you mentioned lengthy communications, and you said
6 Ms. Bock's attorney; is that right?

7 A. That is correct.

8 Q. We've heard testimony about a lawsuit at some point
9 where Feeding Our Future sued MDE?

10 A. We have.

11 Q. Have you reviewed the paperwork filed in that lawsuit?

12 A. I have not.

13 Q. Have you reviewed the complaint or the petition in that
14 lawsuit?

15 A. I have not.

16 Q. Have you read all of the emails between lawyers for
17 Feeding Our Future or otherwise concerning that lawsuit?

18 A. I have not.

19 Q. Or other threats?

20 A. I have not.

21 Q. But have you reviewed some of the communications from
22 the time period when Feeding Our Future was operating
23 between Feeding Our Future, their representatives, and MDE?

24 A. Yes, amongst others.

25 Q. We were just talking about the rally Ms. Bock was

1 organizing in June 2021; is that right?

2 A. That is correct.

3 Q. These other examples that you're describing, the Feeding
4 Our Future keeping the pressure on MDE, were those
5 exclusively in June 2021, or were there some earlier as
6 well?

7 A. No. There's earlier examples as well.

8 Q. I'll call up A21, which is not in evidence. Do you
9 recognize this email, Special Agent?

10 A. I do. This is an email from a previous attorney for
11 Aimee Bock, Feeding Our Future, to the assistant
12 commissioner from MDE, and copied on that email is Aimee
13 Bock.

14 Q. Do you know how law enforcement obtained this email or a
15 copy of it?

16 A. Via search warrant of an email account.

17 Q. All right.

18 MR. BOBIER: Your Honor, the government offers
19 A21.

20 THE COURT: Any objection?

21 MR. UDOIBOK: No objection.

22 MR. MONTEZ: No objection.

23 THE COURT: A21 is admitted.

24 BY MR. BOBIER:

25 Q. All right. Special Agent, there are a few threads,

1 pages to this thread, but before I guess to the bottom,
2 which is where it begins, I just want to identify some
3 participants here for the jury.

4 Okay?

5 A. Okay.

6 Q. We see Aimee Bock; is that right?

7 A. We do.

8 Q. We see someone called Daron Korte and then in
9 parenthesis MDE. Do you have an understanding generally of
10 who that is?

11 A. He was the assistant commissioner for MDE at that time.

12 Q. All right. So he worked for the State somewhere at MDE?

13 A. Correct.

14 Q. Okay. And then there's another name I want to call out,
15 Rhyddid Watkins; is that right?

16 A. Correct.

17 Q. What's your understanding of who Watkins is?

18 A. A previous attorney who represented Aimee Bock and
19 Feeding Our Future.

20 Q. That's Aimee Bock's lawyer?

21 A. Correct.

22 Q. All right. So I want to take you to the first email in
23 this thread, which comes from Mr. Watkins, Ms. Bock's
24 lawyer, on April 28, 2020.

25 Is that right?

1 A. That is correct.

2 Q. All right. So the rally we discussed was June 2021.
3 Here we're all the way back toward the start of the
4 pandemic; is that right?

5 A. That is correct.

6 Q. And if we look at what Mr. Watkins is saying, he says at
7 the very top -- and to be clear, I should have made this
8 more clear.

9 This email "to" is coming from Mr. Watkins to
10 Daron Korte, that MDE employee?

11 A. That is correct.

12 Q. And it's copying Ms. Bock, right?

13 A. Yes, it is.

14 Q. All right. Now in this first email, Mr. Watkins
15 discusses a draft complaint; is that right?

16 A. That is correct.

17 Q. That, you know, what a complaint is at a high level?

18 A. At a high level.

19 Q. At a high level, what's a complaint?

20 A. This is where, a legal document including allegations at
21 hand.

22 Q. It's a way to start a lawsuit?

23 A. Correct.

24 Q. Okay. And Mr. Watkins, Aimee Bock and Feeding Our
25 Future's attorney says, "Please note we are alleging that

1 MDE's decision to deprive minority-owned businesses of the
2 right to even apply for participation in the CACFP is part
3 of a long-established pattern and practice of discriminating
4 against minority-owned businesses."

5 Is that right?

6 A. That is what it says.

7 Q. This email is from April of 2020. Special Agent Wilmer,
8 do you have an understanding of what was going on between
9 Feeding Our Future and MDE around this time at a high level?

10 A. My understanding is, there were a handful of sites at
11 question that Feeding Our Future wanted to have approved to
12 operate under their sponsorship within the food program.

13 Q. So there are sites Feeding Our Future wants to operate,
14 in addition to the sites it already has; is that right?

15 A. Correct.

16 Q. And MDE is not letting those into the program, at least
17 quickly; is that fair?

18 A. That's fair.

19 Q. Okay. And that's what this email is about, as far as
20 you understand it?

21 A. That is my understanding.

22 Q. Okay. Now this email is on Tuesday, April 28th. Toward
23 the bottom of the email, Mr. Watkins, the attorney for
24 Feeding Our Future and Aimee Bock, says, "Feeding Our Future
25 cannot afford to wait long to resolve the issue."

1 Is that right?

2 A. That is correct.

3 Q. Is it your understanding that "this issue" is the thing
4 you just described, meaning some sites that Feeding Our
5 Future wanted to have approved?

6 A. That's my understanding.

7 Q. Okay. Mr. Watkins writes, "Moreover, given the time MDE
8 has already had to review these sites, their objective and
9 impressive qualifications and the impeccable record of
10 Feeding Our Future, MDE should not take long to approve
11 their applications."

12 Is that right?

13 A. That is what it says.

14 Q. In the last line he writes, "We are prepared to offer
15 MDE until Thursday at noon to confirm in writing that it
16 intends to approve each of the eight sites for participation
17 in the program."

18 Is that right?

19 A. That is correct.

20 Q. Remind me what day this was sent.

21 A. Tuesday.

22 Q. So Feeding Our Future is giving the State a day and a
23 half?

24 A. Approximately, yes.

25 Q. To approve the sites?

1 A. That is correct.

2 Q. Because Feeding Our Future, this email says, needs those
3 sites to be able to feed children in minority communities;
4 is that right?

5 A. That is what it states.

6 Q. Now, there's more communication in this thread; is that
7 right?

8 A. There is.

9 Q. Mr. Korte, who works for MDE, you said?

10 A. Yes.

11 Q. He gets back to the attorney and says at a very high
12 level what?

13 A. Very high level, thank you, and we will look into this.

14 Q. We will look at it. Okay.

15 Well, one day went by. The lawyer sends another
16 email.

17 "Any update," right?

18 A. That is what it asks for.

19 Q. All right. And so then Wednesday later in the day after
20 the Feeding Our Future and Aimee Bock attorney threatened a
21 lawsuit, Daron from MDE writes back with good news, he says,
22 right?

23 A. That's correct.

24 Q. What is Mr. Korte's good news for Feeding Our Future?

25 A. That the sites in question will be approved.

1 Q. The sites that Feeding Our Future wanted to have in the
2 program and had threatened to sue MDE if approval wouldn't
3 come quickly; is that right?

4 A. That is correct.

5 Q. Now they're in, according to that communication?

6 A. They are going to be in very soon.

7 Q. Going to be in. It took a day?

8 A. Correct.

9 Q. When you said earlier, Special Agent Wilmer, that the
10 planning of the rally at MDE was, in Aimee Bock's words, an
11 example of keeping the pressure on MDE, you told us keeping
12 the pressure on was something the investigation had seen
13 consistently from Feeding Our Future and Aimee Bock.

14 Is this the kind of thing you had in mind?

15 A. Yes, it is.

16 Q. Now, the good news, as Mr. Watkins writes back in
17 response to MDE agreeing to let those sites in, and what
18 does he say, at a high level?

19 A. That they will not file a lawsuit as long as the
20 approvals come quickly.

21 Q. We don't have to sue you because you gave us what we
22 want.

23 A. Essentially, yes.

24 Q. You let the sites in.

25 A. Correct.

1 Q. And the attorney for Feeding Our Future and Aimee
2 Bock -- copying Aimee Bock; is that right?

3 A. Yes.

4 Q. -- makes really clear in this last paragraph. He says,
5 "I equally hope MDE understands the one and only reason
6 allegations of racism will not be sprawled across the news
7 tomorrow is because of your efforts."

8 Is that right?

9 A. That is what it says.

10 Q. Allegations of racism, is that your understanding of
11 part of what the lawsuit was going to allege?

12 A. Yes, that is what my understanding of this email
13 communication says.

14 Q. Did the jury hear from Ms. Honer at the beginning of the
15 trial, who worked at MDE in this time frame, that her
16 colleagues at MDE were accused of racism?

17 A. Yes, they did.

18 Q. By whom?

19 A. By Feeding Our Future.

20 Q. And Ms. Bock?

21 A. Correct.

22 Q. All right. This is June -- no. I'm sorry. This is
23 April 2020, the 29th.

24 A. Correct.

25 Q. Is that the last time we see Feeding Our Future and

1 Aimee Bock accuse MDE of discrimination or racism?

2 A. No, it is not.

3 Q. It doesn't solve the problem for MDE?

4 A. No, it does not.

5 Q. Let me show you what's not yet in evidence as A23.

6 Another email; is that right?

7 A. Yes, another email. The same participants from

8 Mr. Watkins to Mr. Korte, with Ms. Bock copied.

9 Q. Obtained via search warrant?

10 A. That is correct.

11 MR. BOBIER: Your Honor, I move the admission of

12 A23.

13 MR. UDOIBOK: No objection.

14 MR. MONTEZ: No objection.

15 THE COURT: A23 is admitted.

16 BY MR. BOBIER:

17 Q. All right. So the last communication we were looking
18 at, Special Agent Wilmer, that was the end of April 2020; is
19 that right?

20 A. That is correct.

21 Q. But we didn't make it very long before another issue
22 comes up; is that right?

23 A. The very next day.

24 Q. Very next day? April 30th, a woman named Kendra Pace
25 writes an email.

1 Do you see that?

2 A. I do.

3 Q. Who is Kendra Pace, as far as you understand it?

4 A. She is a Feeding Our Future -- I mean an MDE employee.

5 Q. Okay. She works at MDE?

6 A. That is correct.

7 Q. Okay. And actually her title down here, it looks like
8 she works in the food program in some role; is that right?

9 A. That is correct.

10 Q. Okay. What does Kendra Pace say in the email?

11 A. "Hi, Aimee. Two site ID requests have the same address
12 of 126 Blake Road in Hopkins. Which name do you want me to
13 use when I create the site? Shafi Tutoring and Homework
14 Help or Sambusa King Homework Help/Mentoring. Thank you,
15 Kendra."

16 Q. All right. So before we go any further into this email,
17 do you have an understanding about what the source of
18 Ms. Pace's concern here is or her questioning, rather?

19 A. Yes. My understanding is, this communication comes
20 after seeing two site ID requests that have been submitted
21 that both list the same address.

22 Q. Have we heard any testimony in this case already about
23 multiple Feeding Our Future sites operating at the same
24 location?

25 A. We have. We talked at length about the Columbus Ave

1 location that had two sites, both purportedly serving
2 separate sets of kids from the same physical address.

3 Q. So, for example, if I show you Government's P76a, which
4 is in evidence, the jury's seen that before; is that right?

5 A. They have.

6 Q. Can you remind us what is being shown in P76a?

7 A. This is a photo taken from the pole camera that was put
8 at this location at the end of 2021, and this is the
9 Columbus Ave location I just referenced where two sites at
10 times known as Southside Youth and Feeding Our Future,
11 Taylor both purported to operate.

12 Q. All right. So to be clear, the sites Ms. Pace was
13 talking about in that email we just looked at?

14 A. Yes.

15 Q. That's not what's pictured here in 76a?

16 A. Not this location.

17 Q. P76a depicts a different location where the jurors have
18 heard purportedly more than one Feeding Our Future site
19 operated?

20 A. That is correct.

21 Q. And the email we were just looking at is spring of 2020,
22 right?

23 A. That is correct.

24 Q. But when Special Agent Kary testified at some length
25 about the site in P76a at Taylor, that's all the way in

1 November 2021, right?

2 A. Yes, this image was taken from a later time period.

3 Q. And at a high level, including from Ms. Honer's
4 testimony, what has the jury heard about why it might be a
5 problem for multiple sites purportedly to be operating out
6 of the same location?

7 A. This is a reimbursement program. So the funds that are
8 dispensed from MDE to the sites are to reimburse for food
9 distributed to children, so there should be a way to
10 document, track, exactly how many meals are served to how
11 many kids.

12 You can imagine the concern if two sites are at
13 the exact same place logistically how that would operate.

14 Q. So to return us to A23, is that the email we were just
15 looking at?

16 A. Yes. Same email chain.

17 Q. The concern you were just describing, that's the same
18 sort of thing being raised here by Ms. Pace all the way back
19 in April 2020; is that right?

20 A. Yes. Ms. Pace seems to think that there's an error and
21 it just needs one name because obviously if it's one
22 physical location it must be one site.

23 Q. So Aimee Bock responds, correct?

24 A. She does.

25 Q. And what's her answer?

1 A. They actually need site IDs for both. They are two
2 different suites in the same address that are operating on
3 different schedules. Shafii is Suite 1 and Sambusa is
4 Suite 2.

5 Q. So before we go further in this email, has the jury
6 heard any evidence about Sambusa King?

7 A. They have. This is one of Abdulkadir Awale's
8 businesses. The Blake Road location here is where Sambusa
9 King existed and operated. He served as a vendor for a site
10 named Shafii Tutoring, which purported to operate at that
11 location.

12 His testimony stated that Shafii Tutoring was one
13 site there and he was a purported vendor, but they did not
14 provide the number of meals that were claimed.

15 Q. Mr. Awale told the jury that his Sambusa King site under
16 Feeding Our Future was not legitimate; is that right?

17 A. That's correct.

18 Q. That he inflated counts?

19 A. Correct.

20 Q. To make money?

21 A. Correct.

22 Q. And that's one of the two sites that Ms. Bock in this
23 email to MDE is saying should be treated as one that can go
24 in a location at the same place as another site; is that
25 right?

1 A. My understanding is that he was the vendor for the one
2 site that existed there, which inflated its meal counts and
3 filed under the name Shafii Tutoring.

4 Q. Meaning the jury actually heard testimony about both of
5 these sites from Mr. Awale?

6 A. Both of these entities, yes.

7 Q. All right. So we get a reply from Ms. Pace; is that
8 correct?

9 A. Yes, she asks for further clarification from Ms. Bock.

10 Q. Ms. Pace had opened the thread. Looks like there are
11 multiple sites requests at one location, give us some
12 clarification.

13 A. Correct.

14 Q. Ms. Bock had responded we need both. Two sites, right?

15 A. Correct.

16 Q. What does Ms. Kendra Pace from MDE reply? You don't
17 have to read it. At a high level, what does she ask for?

18 A. Further explanation of how two sites are both operating
19 at the same place. You know, what are they doing to ensure
20 that separate kids are being fed meals at each of the two
21 sites that's not just double counting.

22 Q. All right. Special Agent Wilmer, so far I've been
23 asking you about other examples of Feeding Our Future and
24 Aimee Bock, to use Aimee Bock's words, keeping the pressure
25 on MDE; is that right?

1 A. That's correct.

2 Q. Is there another response or forward on this email
3 thread that you are aware of?

4 A. There is.

5 Q. So after Ms. Pace on May 1st asked for clarification,
6 we're now two days after the Feeding Our Future attorney
7 agreed not to sprawl allegations of racism in the press
8 against MDE.

9 Is that right?

10 A. That is correct.

11 Q. Well, the attorney comes back into this thread, and he
12 forwards it to Mr. Korte; is that right?

13 A. He does.

14 Q. Who's a more senior person than Ms. Pace. I think you
15 said assistant commissioner or something.

16 A. That's correct.

17 Q. Aimee Bock is copied.

18 A. She is.

19 Q. All right. "Daron," Mr. Watkins writes, "there appears
20 to still be an issue with miscommunications."

21 And to summarize, he says some of our sites still
22 aren't approved.

23 Is that correct?

24 A. That is correct.

25 Q. Lower in this email Mr. Watkins refers to Ms. Pace's

1 questions about the Sambusa King and Shafii Tutoring sites
2 purportedly going to be operated at the exact same location;
3 is that right?

4 A. That is correct.

5 Q. And on that subject Mr. Watkins says, "Ignoring for a
6 moment the inappropriateness of MDE depriving these sites of
7 the right to apply and yet having the audacity to question
8 their qualifications, I would like to address the substance
9 of her," meaning Ms. Pace's, "comments."

10 Is that right?

11 A. That is what's stated.

12 Q. Okay. And the attorney for Feeding Our Future, copying
13 Aimee Bock here, purports to provide an explanation, doesn't
14 he?

15 A. He does.

16 Q. He says they are two separate businesses, two separate
17 suites in the same building, right?

18 A. That is what's stated.

19 Q. Was that a similar rationale the jury heard from Feeding
20 Our Future about that Taylor site, something similar?

21 A. Very similar explanation.

22 Q. Even though the Taylor site issue, that's a year and
23 change later.

24 A. That is correct.

25 Q. Okay. These are owned by different people and serve

1 different children, the attorney says.

2 Is that right?

3 A. That is what he says.

4 Q. And then in response to MDE asking those clarification
5 questions we reviewed, the attorney quotes those questions
6 and says, "While I may be able to understand Kendra asking
7 one question about it, I don't understand her asking
8 several."

9 Is that what he says?

10 A. Yes, he does.

11 Q. Read for us again what one of her questions was, which
12 appears to be one that upset the attorney for Feeding Our
13 Future in this email where he copied Aimee Bock.

14 A. "What they are doing to ensure no overlap/that the same
15 kiddos are not receiving more than one meal and one snack
16 per day?"

17 Q. The question being, How are you making sure the sites
18 you are responsible for are complying with the program?

19 A. Correct.

20 Q. Does Aimee Bock and her lawyer keep the pressure on?

21 A. It continues.

22 Q. And the answer from the attorney to Ms. Pace's question
23 says, "That question, to me, is the epitome of systemic
24 racism."

25 A. That is what is stated.

1 Q. What does "epitome" mean?

2 A. Perfect example of something you are discussing.

3 Q. Asking what our sites are doing is the perfect example
4 of systemic racism.

5 A. That is what's stated.

6 MR. BOBIER: Your Honor, this might be a good time
7 to break, if the court's amenable.

8 THE COURT: Are you finished with your
9 questioning?

10 MR. BOBIER: I'm not finished with the direct, but
11 it would be a pretty good time to break, if the court is
12 willing.

13 THE COURT: Are you going on to another --

14 MR. BOBIER: A different pocket, yeah.

15 THE COURT: Fair.

16 MR. BOBIER: Thank you.

17 THE COURT: Then we will break.

18 All rise for the jury.

19 And, members of the jury, we will see you Monday
20 morning.

21 Have a good weekend.

22 3:25 p.m.

23 **IN OPEN COURT**

24 **(JURY NOT PRESENT)**

25 THE COURT: Thank you, Special Agent.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

I want to take five minutes, but I want to talk to the attorneys off the record.

(Court adjourned at 3:26 p.m., 02-27-2025.)

* * *

I, Renee A. Rogge, certify that the foregoing is a correct transcript from the record of proceedings in the above-entitled matter.

Certified by: /s/Renee A. Rogge
Renee A. Rogge, RMR-CRR