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UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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United States of America,	)	File No. 22-cr-223
	)	(NEB/DTS)
Plaintiff,	)	
	)	
v.	)	
	)	Courtroom 13W
Aimee Marie Bock(1),	)	Minneapolis, Minnesota
Salim Ahmed Said(3),	)	Tuesday, March 4, 2025
	)	9:02 a.m.
Defendants.	)	
	)	

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BEFORE THE HONORABLE NANCY E. BRASEL  
UNITED STATES DISTRICT COURT DISTRICT JUDGE  
**VOLUME XIV - JURY TRIAL PROCEEDINGS**

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

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Proceedings recorded by mechanical stenography;  
Transcript produced by computer.

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1 9:02 A.M.

2 **IN OPEN COURT**

3 **(JURY PRESENT)**

4 THE COURT: You may all be seated.

5 Good morning, everyone. You may be seated.

6 And before we begin with testimony, do we have  
7 exhibits to admit?

8 MR. EBERT: That's correct, Your Honor.

9 THE COURT: Mr. Ebert, go ahead.

10 MR. EBERT: I have spoken with counsel, and based  
11 on that, the government has a series of X financial summary  
12 exhibits to offer and move into evidence.

13 And before I begin, I would just clarify, Your  
14 Honor, by my tracking, within that whole series already  
15 admitted is X1 and then yesterday I believe X43 was offered  
16 and admitted.

17 THE COURT: Yes.

18 MR. EBERT: So setting those aside, the government  
19 offers X2 through X10, then X12 through X32, X34, X35, and  
20 then X37, X38, X38a, X39, X41, X42, and then X44 through  
21 X53, and then X56 through X70, and then just to be clear, as  
22 we get towards the ends, that's 56, 57, 58, 59, 60, and then  
23 it jumps to X70.

24 So the government would offer those exhibits, Your  
25 Honor.

1 THE COURT: Thank you.

2 Any objection?

3 MR. UDOIBOK: No objection.

4 MR. MONTEZ: No objection.

5 THE COURT: Thank you. Those exhibits are  
6 admitted.

7 MR. EBERT: All right. Thank you.

8 THE COURT: And then we'll begin with the  
9 continued testimony of Ms. Blackwell.

10 LACRAMIOARA BLACKWELL,  
11 called on behalf of the government, was duly sworn, was  
12 examined and testified as follows:

13 THE COURT: Mr. Jacobs, you may continue.

14 MR. JACOBS: Thank you, Your Honor.

15 DIRECT EXAMINATION

16 BY MR. JACOBS:

17 Q. Good morning, Ms. Blackwell.

18 A. Good morning.

19 Q. Yesterday when we left off, we were going through an  
20 exercise of following the money.

21 Do you remember that?

22 A. I do.

23 Q. And in particular, we were following the tracing of the  
24 money from Feeding Our Future to various sites and then to  
25 entities associated with Mr. Eidleh.

1 Do you recall that?

2 A. I do.

3 Q. And I just want to remind the jury, before we jump back  
4 in, about those entities related to Mr. Eidleh. Four  
5 entities, right?

6 A. Yes, four entities.

7 Q. Eidleh Inc.?

8 A. Eidleh Inc.

9 Q. Hope Suppliers?

10 A. Correct.

11 Q. Bridge Logistics?

12 A. Yes.

13 Q. And Bridge Consulting and Logistics?

14 A. Correct.

15 Q. And where we left off yesterday, we had been talking  
16 about some sites associated with people who the jury has  
17 heard from in the course of this trial.

18 A. Correct.

19 Q. And in particular, we left off with S & S Catering, and  
20 the jury had previously heard from Qamar Hassan. And I  
21 believe we saw a check for \$2,000 from Qamar Hassan to  
22 Eidleh Inc. Okay?

23 So let's continue along those lines with another  
24 site related to a person the jury has heard from already,  
25 Brava Restaurant.

1 A. Okay.

2 Q. Are you familiar with Brava Restaurant?

3 A. I am.

4 Q. What is Brava Restaurant?

5 A. Brava Restaurant is a restaurant in Minneapolis owned  
6 and operated by Hanna Marekegn, who fraudulently  
7 participated in the food program under the sponsorship of  
8 Feeding Our Future.

9 Q. Are there two, two Bravas in this case?

10 A. There are two Bravas.

11 Q. Brava Cafe?

12 A. Brava Cafe is the one owned by Hanna Marekegn, and Brava  
13 Restaurant is the one in Rochester. You are correct.

14 Q. Okay. And the owner of Brava Restaurant is an  
15 individual Sharmake Jama, who the jury has heard from?

16 A. Yes, Brava Restaurant is owned by Sharmake Jama.

17 Q. Just to reorient the jury about Brava, if I pull up X1,  
18 we can see that Brava Restaurant received approximately how  
19 much money in 2020 and 2021?

20 A. Brava Restaurant, which is listed right under Brava Cafe  
21 is, is the one that we're talking about, and between 2020  
22 and 2021 received over \$5.6 million.

23 Q. Did Brava Restaurant make payments to Mr. Eidleh?

24 A. Yes, they did.

25 Q. I'm showing you what's already in evidence as

1 Government's W66. And I'll jump to page 67 of that  
2 document.

3 Okay. So, or let's actually go to W62 and  
4 page 67.

5 All right. We're on W66, page 113. We've landed  
6 where we want to be.

7 Looking at this check, can you tell the jury what  
8 we're seeing?

9 A. This check from Brava Restaurant in Rochester,  
10 Minnesota, was made to Bridge Consulting and Logistics for  
11 the amount of \$14,000 at the end of December 2020, on  
12 December 29th, 2020.

13 Q. Okay. And during this time period, is Brava Restaurant  
14 actively submitting claims to Feeding Our Future?

15 A. Yes, they are.

16 Q. Can you give the jury a sense of how big the claims are  
17 that they're submitting?

18 A. The claims were for thousands of children a day every  
19 day.

20 Q. Every day? Seven days a week?

21 A. Seven days a week.

22 Q. Okay. And is Feeding Our Future submitting these  
23 claims?

24 A. Yes, they are.

25 Q. And is Feeding Our Future ultimately paying out Brava

1 Restaurant for these claims?

2 A. Yes, they are.

3 Q. Okay. And in the midst of that we see a check for  
4 \$14,000 from Brava Restaurant to an entity controlled by  
5 Mr. Eidleh.

6 A. Bridge Consulting and Logistics, yes.

7 Q. What was significant to you about seeing a payment like  
8 this?

9 A. Given the fact that Mr. Eidleh was an employee at  
10 Feeding Our Future and his job responsibilities, including  
11 oversight of sites like Brava Restaurant and specifically  
12 Brava Restaurant, there was no need for him to be getting  
13 paid by Brava Restaurant for acting as a Feeding Our Future  
14 employee.

15 Q. All right. I want to keep moving along and talk about  
16 another entity, another site under the sponsorship of  
17 Feeding Our Future, Shamsia Hopes.

18 Are you familiar with that entity?

19 A. I am. It's an entity owned and operated by Mekkira  
20 Hussein and participate in the food program as a site.

21 Q. Okay. And if we pull up our trusty X1 chart we can see  
22 Shamsia Hopes got how much money during 2020 and 2021?

23 A. During this time frame, it got over \$6 million.

24 Q. Okay. And that's actually just one site of Shamsia  
25 Hopes. There are multiple?

1 A. There are multiple Shamsia Hopes, yes.

2 Q. Here pulling up a second one, how much money did that  
3 site get?

4 A. Second site got over \$3.5 million.

5 Q. Almost \$10 million from Feeding Our Future?

6 A. Almost.

7 Q. Over 9 million?

8 A. I would say so, yes, between the two of them.

9 Q. Did Shamsia Hopes make payments to entities owned by  
10 Mr. Eidleh?

11 A. Yes, they did.

12 Q. Okay. We're on Government Exhibit W65 and page 13, and  
13 here, is this one an example of one of those payments you  
14 just referenced?

15 A. Yes.

16 Q. Can you walk the jury through this particular check?

17 A. We're looking at a check from Shamsia Hopes to Bridge  
18 Logistics, which is another entity owned and controlled by  
19 Mr. Eidleh. This check is for \$18,000, dated January 8th,  
20 2021, and the purpose of the payment is, purports to be for  
21 supplies.

22 Q. And as part of what you refer to as following the money,  
23 do you look at what Bridge Logistics spends money on?

24 A. Yes.

25 Q. Did you see Bridge Logistics spending any money on

1 supplies?

2 A. Based on my review of the financials, no, I did not.

3 Q. What was significant about that to you in the context of  
4 this \$18,000 check to Mr. Eidleh?

5 A. Again, based on my review of the financials, not seeing  
6 the activity in those, in that account supporting purchase  
7 of supplies, I concluded that this was not for supplies and  
8 it was for something else.

9 Q. What did you conclude that something else was?

10 A. It was a kickback.

11 Q. Fair to say there were many other checks from Shamsia  
12 Hopes or entities related to Shamsia Hopes?

13 A. Yes.

14 Q. To Mr. Eidleh?

15 A. Yes.

16 Q. We'll keep walking through and talk about another site  
17 that time jury has heard quite a bit about, and that's  
18 Evergreen Grocery and Deli. Are you familiar with  
19 Evergreen?

20 A. Yes, I am.

21 Q. What's Evergreen?

22 A. Evergreen restaurant -- Grocery and Deli, was a site in  
23 Minneapolis. It was owned and controlled by Said Ereg and  
24 his spouse Najmo Ahmed, again fraudulently participated in  
25 the food program under the sponsorship of Feeding Our

1 Future.

2 Q. And if we pull up our X1 chart, we can see Evergreen  
3 received approximately how much money in payments from  
4 Feeding Our Future?

5 A. Between 2020 and 2021, Evergreen received over  
6 \$4.6 million.

7 Q. Did Evergreen make payments to Mr. Eidleh?

8 A. Oh, yes, they did.

9 Q. You say, "Oh, yes they did." What do you mean by that?

10 A. They made multiple payments to Mr. Eidleh.

11 Q. Significant amounts of money?

12 A. Very much so.

13 Q. Let's walk through a couple of those.

14 Okay. Here we see a check from June of 2020  
15 fairly early in Evergreen's participation in the food  
16 program?

17 A. Yes.

18 Q. And this is a check from Evergreen Grocery to Eidleh  
19 Inc. And the amount of the check is \$1,000?

20 A. The amount of the check is \$1,000. The check is dated  
21 June 28th, 2020, and purportedly for consulting.

22 Q. Okay. We talked about this yesterday, but can you  
23 remind the jury what you found significant about checks that  
24 had consulting or some variation of that in the memo line?

25 A. The purpose of the payment was not really for consulting

1 because there was no reason for -- it was just an  
2 explanation provided for receiving the payments into the  
3 accounts belonging to Mr. Eidleh.

4 Q. Did Evergreen Grocery proceed to make payments to  
5 Mr. Eidleh and his various businesses?

6 A. Yes.

7 Q. On a near monthly basis?

8 A. I would say so, yes.

9 Q. Did those payments continue to grow?

10 A. They did.

11 Q. So jumping ahead in time to November of 2020, jumping  
12 ahead a couple months, what do we see here?

13 A. We see another example of one of those payments, again  
14 in the form of a check, and this check is for the amount of  
15 \$5,500 from Evergreen to Eidleh Inc., like you mentioned,  
16 and the date of the check is November 26, 2020.

17 Q. And again moving ahead in time a couple more months, we  
18 see another check. This one dated February 25th. How much  
19 is this check for?

20 A. Yes. This check three months later is issued for  
21 \$20,000 to Eidleh Inc. from Evergreen Grocery.

22 Q. Is this consistent with ongoing monthly checks from  
23 Evergreen Grocery to Eidleh Inc.?

24 A. It is.

25 Q. In escalating amounts?

1 A. It keeps growing, yes.

2 Q. Pulling up what's already in evidence as Government  
3 Exhibit F7, this is an email that the jury has seen before,  
4 but it is about, it relates to, and I'll read this first  
5 part, clarification of how Feeding Our Future will be  
6 operating some of our sites.

7 And if I go down to the fifth page, you will see  
8 that Evergreen Grocery is purportedly one of those sites?

9 A. Yes.

10 Q. Yesterday the jury heard quite a bit about a site called  
11 Xogmaal. Are you familiar with Xogmaal?

12 A. Xogmaal Media Group, yes. Media company that  
13 fraudulently participated in the food program under the  
14 sponsorship of Feeding Our Future.

15 Q. Okay. And the jury saw a couple emails yesterday, but I  
16 want to quickly remind them and pull up Q85.

17 Can you, at a high level, explain to the jury  
18 what's happening in this email?

19 A. We see an email from Hadith Ahmed sent on February 27,  
20 2021, to aimeebock@feedingourfuturemn.org saying, "Hello,  
21 boss. We took a lot of organizations that don't work with  
22 children or advocates. I am just realizing that now. For  
23 example, Xogmaal is a TV show program. They have no  
24 interest with children. These are the things we need to  
25 clean up."

1 Signed Hadith Ahmed, program support staff.

2 Q. Okay. "These are the things we need to clean up." And  
3 this email is from March of 2021.

4 Jumping ahead in time to July, it's an email  
5 exchange between Aimee Bock and Coley Flynn, the bottom one  
6 from Coley Flynn. Xogmaal came in looking for payments for  
7 March, April, May; and Aimee Bock responds, "Please pull his  
8 meal counts for me."

9 Do you see that?

10 A. I do.

11 Q. And what's the date?

12 A. The response is dated July 12, 2021, the same day the  
13 email went to Aimee Bock.

14 Q. Okay. And if we look now at the Feeding Our Future bank  
15 records, what do we see here?

16 A. We see a check from Feeding Our Future to Xogmaal Media  
17 Group, dated July 9th, 2021, in the amount of \$330,770.

18 Q. Okay. So one, ostensibly one of the checks to pick up  
19 for Xogmaal?

20 A. Correct.

21 Q. Was this check ultimately cashed or deposited?

22 A. I think so, yes.

23 Q. Okay. So that email about picking up the checks was  
24 July 12th.

25 A. Yes.

1 Q. Did Xogmaal Media Group, the media group that  
2 purportedly ran a site, make payments to Mr. Eidleh?

3 A. Yes, they did.

4 Q. Okay. I'm pulling up Government Exhibit W66 on  
5 page 154. It's the Bridge Consulting and Logistics bank  
6 records. What's this check that the jury is now looking at?

7 A. This check from Xogmaal Media Group to Bridge Consulting  
8 and Logistics LLC is dated July 20, 2021, in the amount of  
9 \$183,000. And the memo line specifies April, May, June,  
10 Supplies and Loan.

11 Q. Okay. April, May, June, is that consistent with the  
12 months that Mr. Flynn and Ms. Bock were talking about in the  
13 email that we just looked at?

14 A. Yes, it is.

15 Q. And that email was from July 12th?

16 A. It was.

17 Q. So eight days later what do we see?

18 A. Eight days later there's a payment from the company that  
19 received the payment as -- for claimed reimbursements to an  
20 employee of Feeding Our Future, respectively Abdikerm  
21 Eidleh.

22 Q. And remind us what Ms. Bock said one week earlier  
23 whether they were discussing those claims.

24 A. Ms. Bock responded, "Please pull his meal counts for  
25 me."

1 Q. I want to keep moving along to one more site for people  
2 that we heard about, in this case Lido Restaurant and SAFE,  
3 Somali American Faribault Education.

4 Are you familiar generally with those two sites?

5 A. I am. Lido Restaurant is a site that fraudulently  
6 participated in the food program. It's located in  
7 Faribault, Minnesota. It was also a vendor for SAFE, for  
8 the Somali American Faribault Education.

9 Q. And those sites were run by a husband and wife couple  
10 Lul Ali and Mohamed Hussein?

11 A. Yes, it was run by a family, husband and wife.

12 Q. Okay. And the jury heard testimony from both of them  
13 and heard testimony about cash kickback payments. And I  
14 want to walk through the Lido Restaurant bank statements for  
15 a minute.

16 Okay?

17 A. Sure.

18 Q. Okay. So I'm showing you what's already admitted into  
19 evidence as Government Exhibit 225. And can you tell the  
20 jury what this exhibit is?

21 A. This exhibit shows the account signers for the account  
22 under the name of Lido Restaurant. Customer one, Lido  
23 Restaurant; customer two, Mohamed A. Hussein.

24 Q. Okay. And what was the date that this particular  
25 account was opened?

1 A. The opening date is May 21, 2020.

2 Q. All right. So jumping down to page 31 in the September  
3 time frame, I want to turn your attention to an entry on  
4 September 14th.

5 What are we seeing in this line item on  
6 September 14th?

7 A. We're looking at a transaction dated September 14th that  
8 represents a deposit, a funds transfer from Feeding Our  
9 Future in the amount of \$170,146.86.

10 Q. All right. So in the course of this case we've seen  
11 lots and lots of checks from Feeding Our Future. You  
12 referred to a funds transfer.

13 Can you explain to us what that is?

14 A. Sure. It's an electronic deposit.

15 Q. Equivalent to a check, a way to move money from one  
16 account to another?

17 A. It's a way to move money from one account to another,  
18 yes.

19 Q. So what we're seeing on September 14th is a \$170,000  
20 payment from Feeding Our Future to Lido Restaurant?

21 A. Yes.

22 Q. Okay. I'm moving down to page 196, and this is another  
23 document that's dated September 14th of 2020. Same date as  
24 that deposit?

25 A. It is the same date, yes.

1 Q. And if I go up into the top left-hand corner it says  
2 Withdrawal. Can you explain to the jury what we're seeing  
3 on page 196 here?

4 A. What we're looking at is a withdrawal slip. It's a bank  
5 form that a person that wishes to make a withdrawal and is  
6 on the account fills out when they walk into a bank to  
7 document their request for funds withdrawal.

8 Q. Okay. And on this particular withdrawal slip dated  
9 September 14th of 2020, can you walk us through the details  
10 here?

11 A. Sure. The name of the person who makes the withdrawal  
12 is Mohamed Hussein in Faribault. Again, the date is  
13 September 14th, 2020. And the amount withdrawn is \$30,000.

14 Q. Okay. So the same date that 170 some odd thousand  
15 dollars comes in from Feeding Our Future, Mr. Hussein  
16 withdraws \$30,000 in cash from the bank?

17 A. Correct.

18 Q. Is this a pattern that you saw on an ongoing basis in  
19 this account?

20 A. Yes, it is.

21 Q. I want to walk through a few more months here. All  
22 right. Here we're in November of 2020. And this is another  
23 funds transfer from November 27th. Can you tell the jury  
24 the details of this one?

25 A. Sure. We're looking at a deposit of \$182,497.60 from

1 Feeding Our Future to Lido Restaurant. And this one is  
2 dated November 27th. It looks like it was sent on  
3 November 25th, but it reached the account November 27th.  
4 They posted on the account November 27th.

5 Q. Okay. Another reimbursement claim check to Lido  
6 Restaurant?

7 A. Correct.

8 Q. Not a check, but in this case a fund?

9 A. Funds transfer.

10 Q. And this is November 27th. Jumping ahead, we're looking  
11 to page 218. It's another withdrawal slip, And this one is  
12 dated December 8th. About a week and change later?

13 A. Yes.

14 Q. And what is this withdrawal slip?

15 A. This withdrawal slip is, shows the withdrawal by Mohamed  
16 Hussein of \$20,000 from the account.

17 Q. Okay. \$20,000 cash withdrawal from the account?

18 A. Yes.

19 Q. On December 8th.

20 Moving down to page 219, this one's a little  
21 faint, but can you tell -- let me zoom in to help.

22 Can you tell the jury what this one is?

23 A. Sure. This is another withdrawal slip that is filled  
24 out for withdrawing \$20,010 from the account on  
25 December 9th, 2020, by Mohamed Hussein.

1 Q. Okay. So just to recap, November 27th a funds transfer  
2 comes in from Feeding Our Future?

3 A. Money comes in from Feeding Our Future.

4 Q. And about a week and a half later, you see consecutive  
5 days of withdrawals of \$20,000 cash?

6 A. Correct.

7 Q. Okay. We're in that same bank statement for Lido  
8 Restaurant. We're now on page 152. And now we're looking  
9 at something that's maybe a little more familiar to the  
10 jury.

11 This is a check from Feeding Our Future to Lido  
12 Restaurant. Can you tell the jury what we're seeing here?

13 A. Sure. This check is issued from Feeding Our Future to  
14 Lido Restaurant. It is dated December 29, 2020, and the  
15 amount is \$176,321.76. The memo line says November 2020.

16 Q. Okay. So a typical claim reimbursement check from  
17 Feeding Our Future?

18 A. Yes.

19 Q. And this one is dated December 29th, 2020.

20 Jumping down to page 228, we see another  
21 withdrawal slip, this time dated December 30th of 2020.

22 A. Yes, a day later.

23 Q. One day later. Can you tell the jury what we're seeing  
24 in this withdrawal slip?

25 A. Yes. We see that Mohamed Hussein on December 30th,

1 2020, withdraws \$20,000.

2 Q. Okay. A day after the check is dated, he withdraws  
3 \$20,000 in cash?

4 A. He does.

5 Q. And can you remind the jury how much cash he withdrew on  
6 December 8th and 9th total?

7 A. Approximately \$40,000.

8 Q. And again, is this an ongoing pattern that you are  
9 seeing in the Lido Restaurant bank records in terms of  
10 deposits by Feeding Our Future or checks from Feeding Our  
11 Future and large cash withdrawals?

12 A. Yes, that is an ongoing pattern.

13 Q. Okay. So we talked about Lido Restaurant, but there's  
14 another entity called SAFE or Somali American Faribault  
15 Education.

16 Are you familiar with SAFE?

17 A. Sure. It's a nonprofit controlled by Mohamed Hussein.

18 Q. Okay. And the jury heard from Mohamed Hussein who  
19 testified about some checks that he wrote to Mr. Eidleh, but  
20 I want to walk through those checks with you now.

21 Okay?

22 A. Okay.

23 Q. So I'm pulling up what's already in evidence as  
24 Government Exhibit 230. And these are the bank statements  
25 for what?

1 A. For Somali American Faribault Education.

2 Q. Okay.

3 A. For the nonprofit.

4 Q. Okay. Jumping down to page 95, we see two checks from  
5 SAFE to Bridge Logistics. The top check is dated June 30th,  
6 2021. It's for \$10,000. And the bottom check is dated  
7 May 31st, 2021, for \$24,100.

8 Do you see that?

9 A. I do.

10 Q. And the memo lines on those checks are fairly similar.  
11 What does it say?

12 A. Yes, the memo lines both refer to transportation. The  
13 first check for February. The second check for May 2021.

14 Q. Okay. And moving on to the next, moving down to  
15 page 97, we see two more checks. Can you tell the jury the  
16 high level details of these checks?

17 A. Sure. Both of these checks are from SAFE, Somali  
18 American Faribault Education, to Bridge Logistics LLC,  
19 Mr. Eidleh's entity. They are for approximately \$26,000  
20 each, and they both refer to Transportation, first  
21 Transportation Labor for June. Second one Transportation  
22 and Staff for March.

23 Q. Okay. Going down one more page we see a final check for  
24 Bridge Logistics, this one dated June 25th, for \$26,000 and  
25 change. And again the memo line is Transportation?

1 A. Again, the memo line is Transportation and refers to  
2 April, the month of April.

3 Q. In the top right-hand corner you see a number. In this  
4 case it's 2088. What, what's that number mean?

5 A. That is a sequential number assigned to checks in a  
6 checkbook.

7 Q. So every check will sequentially go up one in number?

8 A. Sure.

9 Q. Did you notice anything about these five checks from  
10 Somali American Faribault Education to Bridge Logistics?

11 A. Yes, I did.

12 Q. What is that?

13 A. They are in sequential order.

14 Q. Meaning that that particular check was check 2088.

15 These two checks are 2086 and 2089. And these two checks  
16 are 2085 --

17 A. And '87.

18 Q. What was significant to you about that?

19 A. It's indicative of the fact that they were issued at the  
20 same time.

21 Q. And in your -- for example, if we look at another check  
22 from around the same time, this one is not sequential.

23 A. This one is not.

24 Q. Did you notice anything else about the checks that led  
25 you to believe they were all written at the same time, even

1       though the date of these checks are over a several month  
2       period?

3       A.   Yes.  If we look at these two checks in particular and  
4       the other checks on the same page, we notice that the date  
5       format that is written on these checks is a little  
6       different.

7       Q.   Can you explain that to the jury?

8       A.   Like for instance how the date is written, 6 -- in check  
9       2085, how the date is written 6/30/2021 is different than  
10      the first check on the page, which is 6-2-21.

11     Q.   Okay.  So this Bridge Logistics check, the date uses a  
12     slash?

13     A.   It did.

14     Q.   Another Bridge Logistics check from a month earlier,  
15     date uses a slash?

16     A.   Yep.

17     Q.   This check not to Bridge Logistics, it uses a hyphen in  
18     the date?

19     A.   Yeah, like a small dash.

20     Q.   Did you see any other checks, apart from the Bridge  
21     Logistics ones, that uses a slash in the date?  I'm just  
22     going to scroll through a few pages of checks.

23                 Here we go with two more Bridge Logistics ones.

24     A.   Yeah, the only ones that stand out with the date format  
25     using a slash are the ones written to Bridge Logistics.

1 Q. Okay. Between the date convention that you observed and  
2 the sequential checks, what was your takeaway about these  
3 checks written from SAFE to Bridge Logistics?

4 A. It appears the day they issued, they were just issued at  
5 the same time broken from the checkbook, given at the same  
6 time to someone else who then filled them out.

7 Q. Do you think that the same person wrote the date in the  
8 Bridge Logistics checks as in the other checks in the Somali  
9 American Faribault Education account?

10 A. Yes.

11 Q. You think the same person wrote the date line in those  
12 checks?

13 A. No. I think, I think they are different. The ones that  
14 were written to Bridge Logistics were written by someone  
15 else.

16 Q. So we've talked about various sites under Feeding Our  
17 Future, many of whom the jury heard from witnesses who  
18 operated those sites. I want to now talk about sites  
19 relating to the Safari group.

20 Are you familiar with that term?

21 A. Yes.

22 Q. And at a high level, what do we mean by the Safari  
23 group?

24 A. Safari group refers to entities and people associated  
25 with entities including the Safari Restaurant and affiliated

1 and related entities that operated sites that were vended by  
2 the Safari Restaurant.

3 Q. Okay. Did various sites associated with Safari  
4 Restaurant make payments to Mr. Eidleh?

5 A. Yes, they did.

6 Q. I want to walk through those pretty quickly now, but  
7 pull up some examples for you. Okay?

8 Are you familiar with Olive Management?

9 A. Yes.

10 Q. What is Olive Management?

11 A. Olive Management is an entity controlled by Ahmed  
12 Omar-Hashim.

13 Q. Did Olive Management make payments to Mr. Eidleh?

14 A. Olive Management, who had a site and participating in  
15 the food program, yes, made a payment to Eidleh Inc., which  
16 is controlled by Mr. Eidleh.

17 Q. So we're looking at Government Exhibit W50. It's the  
18 Eidleh Inc. bank records. This is a January 18th, 2021,  
19 check from Olive Management to Eidleh Inc. for \$24,000; is  
20 that right?

21 A. Yes, that's right.

22 Q. Is this the only check that Olive Management wrote to  
23 Mr. Eidleh?

24 A. No, it's not.

25 Q. Just one example of it?

1 A. It's just one example.

2 Q. Okay. What about Horseed Management? Are you familiar  
3 with Horseed Management?

4 A. Yes, Horseed Management is an entity that also  
5 participated in the food program on this site.

6 Q. Stigma-Free, Mankato?

7 A. Yes, in Mankato.

8 Q. Did Horseed Management make payments to Mr. Eidleh?

9 A. Yes, they did.

10 Q. Okay. Again, we're in the Eidleh Inc. bank records, and  
11 we see a February 8th, 2021, check from Horseed Management  
12 to Eidleh Inc. for how much money?

13 A. This check is for \$56,000.

14 Q. Is this the only check that Horseed Management wrote to  
15 Mr. Eidleh or his related entities?

16 A. No.

17 Q. One of many?

18 A. One of many.

19 Q. All right. Moving on through the Safari group, what  
20 about ASA Limited?

21 A. ASA Limited also owned a site. ASA Limited is owned and  
22 operated by Abdihakim Ahmed.

23 Q. And the S in ASA Limited, who does that stand for?

24 A. A second owner of ASA Limited, which is Salim Said.

25 Q. Did ASA Limited write checks to Mr. Eidleh?

1 A. Yes, they did.

2 Q. Okay. Pulling up a check, this time made out to Hope  
3 Suppliers from ASA Limited, what do we see here?

4 A. We see a check for \$14,000, dated December 30, 2020, to  
5 Hope Suppliers.

6 Q. Okay. This check is from December. The one before it  
7 was from February. And the one before that was from  
8 January.

9 During this time period, are all of these sites  
10 submitting claims and receiving reimbursements from Feeding  
11 Our Future?

12 A. Yes, they are.

13 Q. And was this the only check that you saw from ASA  
14 Limited to Mr. Eidleh?

15 A. It's just one of multiple checks.

16 Q. Tunyar Trading, are you familiar with that entity?

17 A. Yes.

18 Q. What is Tunyar Trading?

19 A. Tunyar Trading entity is an entity that is controlled by  
20 Abdikadir Mohamud.

21 Q. And was Tunyar Trading a vendor for a Feeding Our Future  
22 site?

23 A. Yes, for Stigma-Free.

24 Q. Willmar?

25 A. Willmar.

1 Q. Okay. Did Tunyar Trading write checks to Mr. Eidleh?

2 A. Yes, they did.

3 Q. All right. Pulling up this check that's dated 2/12 of  
4 2021, this time to Bridge Logistics. Another Eidleh entity?

5 A. Yes.

6 Q. And from Tunyar Trading?

7 A. Yes. Tunyar Trading writes a check to Bridge Logistics  
8 in February 2021 for \$68,333.

9 Q. Was Stigma-Free, Willmar under the sponsorship of  
10 Feeding Our Future at this time?

11 A. Yes.

12 Q. What did that mean for Stigma-Free, Willmar to be under  
13 the sponsorship of Feeding Our Future?

14 A. Well, they were submitting claims for reimbursement in  
15 the food program.

16 Q. And what was Feeding Our Future's role in reviewing  
17 those claims?

18 A. Well, they reviewed them, and they submitted them for  
19 approval to Minnesota Department of Education.

20 Q. At the same time that Tunyar Trading is writing a  
21 \$68,000 check to --

22 A. To one of its employees, yes.

23 Q. Okay. Familiar with an entity called Salim Limited?

24 A. I am.

25 Q. And what entity or what is Salim Limited?

1 A. Salim Limited is an entity opened and controlled by  
2 Salim Said.

3 Q. And how about an entity called Cosmopolitan Business  
4 Solutions?

5 A. Cosmopolitan Business Solutions is the legal name of the  
6 entity that owns and operates Safari Restaurant.

7 Q. Okay. We're going to talk about checks from those two  
8 entities to Mr. Eidleh in a minute, but before we get there,  
9 and we're going to talk with some specificity, but before we  
10 get there I want to go back to the high level of the  
11 entities we were just talking about.

12 Okay?

13 A. Sure.

14 Q. I want to pull up what's already been admitted into  
15 evidence as Government's X25.

16 And we talked about some of these charts  
17 yesterday, Ms. Blackwell, but can you remind the jury what  
18 we're seeing here?

19 A. This is a summary of Eidleh Inc. accounts, a combined, a  
20 total of transactions in accounts belonging to Eidleh Inc.  
21 showing money in and money out.

22 Q. Okay. So sometimes we refer to these as sources and  
23 uses?

24 A. As sources and uses summary chart, yes.

25 Q. Left-hand side are sources?

1 A. Deposits.

2 Q. Money coming in?

3 A. Money coming in.

4 Q. On the right-hand side is uses of funds, money going  
5 out?

6 A. Money going out.

7 Q. Okay. And in this particular case, this chart is a  
8 summary of accounts for Eidleh Inc. Do you see that?

9 A. Correct.

10 Q. I want to focus on the sources of funds here, and I want  
11 to go down to the food program money.

12 Now, there are a number of entities on this list,  
13 starting with Evergreen Grocery. That's one we talked  
14 about?

15 A. Yes.

16 Q. Tunyar Trading. That's one we just talked about?

17 A. Absolutely.

18 Q. And on and on. Horseed Management, we just talked about  
19 that?

20 A. Correct.

21 Q. Cosmopolitan Business Solutions?

22 A. Safari Restaurant, yes.

23 Q. Karmel Coffee?

24 A. Yes.

25 Q. Okay. These are all entities that are in the food

1 program under the sponsorship of Feeding Our Future?

2 A. They are.

3 Q. And in total how much, how much funds came in to Eidleh  
4 Inc. from these entities?

5 A. The combined total paid to Mr. Eidleh to Eidleh, his  
6 Eidleh Inc. account is over \$825,000.

7 Q. And on the other side the uses, do you see large cash  
8 withdrawals from that account?

9 A. Yes, I do.

10 Q. Approximately \$57,000 in cash withdrawals over that  
11 period?

12 A. Approximately \$57,000, yes.

13 Q. Okay. Showing you another sources and uses chart that  
14 is in evidence, this one is for which entity?

15 A. For Bridge Consulting and Logistics LLC.

16 Q. Okay. And similarly, if we focus on the sources of  
17 funds or the money coming in, from a high level, what are we  
18 seeing about the money coming into that account?

19 A. We're seeing that the entities who paid Mr. Eidleh via  
20 his Bridge Consulting and Logistics account are also  
21 participants in the food program, and they total -- a  
22 combined total of over \$1.1 million.

23 Q. Okay. So I'm looking at the second one, Xogmaal Media  
24 Group. That's the media group that we looked at some emails  
25 about earlier?

1 A. That's the same entity, yes.

2 Q. Two \$226,000 coming in?

3 A. Correct.

4 Q. Horseed Management, that's an entity under the Safari  
5 group?

6 A. Yes.

7 Q. \$56,000?

8 A. \$56,000.

9 Q. Shamsia Hopes, that's another one we talked about?

10 A. It is.

11 Q. Brava Cafe, \$25,000?

12 A. Yes.

13 Q. Okay. And then jumping over to the other side, the uses  
14 of funds, what do you see under cash withdrawals?

15 A. Under cash out, we see a combined total of over \$62,000  
16 being withdrawn from the account.

17 Q. Okay. Jumping ahead to X26, which is another sources  
18 and uses chart already in evidence, this time for Bridge  
19 Logistics.

20 Do you see that?

21 A. I do.

22 Q. Okay. And we'll again highlight the sources of funds in  
23 under food program money. And again from a high level, can  
24 you tell the jury what you are seeing under the sources of  
25 funds here?

1 A. Sure. All of these entities that we're seeing paying  
2 Mr. Eidleh various amounts into his Bridge Logistics  
3 accounts are participants in the food program, and the  
4 combined total of those payments is over \$629,000.

5 Q. Okay. Somali American Faribault Education, the second  
6 entry?

7 A. That's SAFE.

8 Q. \$113,000?

9 A. Correct.

10 Q. Tunyar Trading LLC, \$68,000?

11 A. Correct.

12 Q. Okay. And again if we go over to the uses, do we see  
13 another large set of cash withdrawals under these funds?

14 A. We do.

15 Q. This time for \$28,000?

16 A. This time over \$20,000, yes.

17 Q. Okay. So we talked about a lot of sites under the  
18 sponsorship of Feeding Our Future, and now I want to focus  
19 on entities associated with the defendant Salim Said.

20 Okay?

21 A. Okay.

22 Q. And those are entities Salim Limited and Cosmopolitan  
23 Business Solutions.

24 A. Correct.

25 Q. So I'm pulling up what has already been admitted into

1 evidence as Government's Z16. Government Z16 corresponds  
2 with Count 16. Do you understand that?

3 A. It does correspond with Count 16, yes.

4 Q. Okay. And in this particular case, Z16 or Count 16 is a  
5 payment from who to whom?

6 A. This basement is a check payment from Cosmopolitan  
7 Business Solutions to Eidleh Inc. for \$1,500.

8 Q. Okay. Dated July 28th of 2020?

9 A. The date of the check is July 28th, 2020.

10 Q. Fairly early on in the participation of Safari  
11 Restaurant in the Federal Child Nutrition Program?

12 A. Yes, I would say so.

13 Q. Okay. So let me take a step back from there and show  
14 you on one side what's been admitted into evidence as B61  
15 and on the other side what's been admitted into evidence as  
16 W3.

17 Okay. On the left side what are we looking at?

18 A. On the left side we have a claim summary filled out for  
19 the month of June 2020 by Feeding Our Future for Safari, for  
20 the Safari site. And we're looking, it looks like --

21 Q. On the right side?

22 A. On the right side, we're looking at the bank statement  
23 for the Safari account, the Cosmopolitan Business Solutions  
24 account at Associated Bank, for the month of July of 2020.

25 Q. Okay. So left side, June claims?

1 A. Correct, June claims.

2 Q. How many purported lunches and snacks were served that  
3 month?

4 A. Over 107,000 each.

5 Q. Okay. And the total amount of claim reimbursement that  
6 they're claiming is how much?

7 A. The site payment is over \$342,000.

8 Q. Okay. June claims. And we'll jump over to the right  
9 side to the Safari Restaurant, Cosmopolitan Business  
10 Solutions bank statement, and I'm going to highlight two  
11 entries there.

12 What are we seeing on the right side in the bank  
13 statements?

14 A. We're looking at two electronic funds transfers from  
15 Feeding Our Future to the Safari Restaurant, dated July 24th  
16 and 27th. One for \$42,000 and change, and the other one for  
17 \$300,000.

18 Q. Okay. So left side claims for June, over a hundred  
19 thousand meals. And the site payment is \$342,000. And on  
20 the right side is the actual payment for those claims?

21 A. Yes, the actual payment for those claims, which totals  
22 \$342,029.

23 Q. Okay. And those payments are July 24th and July 27th?

24 A. Yes, they are.

25 Q. Okay. Going back to Z16 or Count 16, one day later

1 after that \$300,000 deposit, what do we see?

2 A. We see that on July 28th, a day later, a check goes from  
3 Cosmopolitan Business Solutions to Eidleh Inc. for \$1,500.

4 Q. All right. Moving on to Z17. And I'm going to  
5 similarly pull up on one side B62 already in evidence and on  
6 the other side pull up the Cosmopolitan Business Solutions  
7 bank accounts.

8 Again, can you tell the jury what we're seeing in  
9 the meal counts on the left side?

10 A. On the left side, we're looking at a meal count sheet  
11 for the week of July 2020, filled out by the Safari  
12 Restaurant. And we see the numbers of meals received and  
13 prepared is \$5,000 from Sunday to Saturday each day every  
14 day, 5,000 round.

15 And the account sheet is signed by Salim Said.

16 Q. Okay. So the jury's heard plenty about meal count  
17 sheets, but 5,000 lunches a day every day of the week in  
18 this week of July?

19 A. Yes.

20 Q. And it's signed by whom?

21 A. Signature belongs to Salim Said and is dated July 11,  
22 2020.

23 Q. Okay. And this is consistent for the month of July?

24 A. Yes, it is.

25 Q. All right. Jumping over to the right side, the

1       Cosmopolitan Business Solutions bank account, I want to  
2       highlight several entries here.

3               So I'm blowing up three funds transfers on August  
4       17th, 18th and 19th. What are these fund transfers for?

5       A. We're looking at three consecutive days where payments  
6       from Feeding Our Future are made to the Safari Restaurant  
7       account totaling over \$700,000.

8       Q. So on the left-hand side we see those meal count claims  
9       for July for 5,000, after 5,000, after 5,000.

10              Jump over to the right-hand side, and we see fund  
11       transfers for over \$700,000 to Safari Restaurant?

12       A. Yes, we do.

13       Q. Okay. And those, the date of those fund transfers are  
14       what?

15       A. August 17th, August 18th, and August 19th respectively.

16       Q. Okay. Jumping now to Government Exhibit Z17 or Count  
17       17, what do we see in this check dated August 20th of 2020  
18       or one day after that last fund transfer?

19       A. We see a payment going from Cosmopolitan Business  
20       Solutions, which is Safari Restaurant, to Eidleh Inc. for  
21       \$2,500.

22       Q. Okay. Who is that check signed by?

23       A. The check is signed by Salim Said.

24       Q. All right. Let's keep going in order to Z18. On the  
25       left-hand side, I'm going to pull up Government Exhibit B62

1 already in evidence -- B63 already in evidence, and on the  
2 right-hand side, I'm going to pull up again the Cosmopolitan  
3 Business Solutions bank account.

4 Does this look similar to what we just saw, but  
5 can you tell the jury what is, what is different about these  
6 two documents that we're looking at?

7 A. Sure. This is meal counts sheet filled out for the week  
8 of August 9, 2020. Again, that number of meals is in the  
9 5,000 range each day every day.

10 The initials of the person taking the daily meal  
11 counts is SS, corresponding with Salim Said. The signature  
12 on the meal counts is Salim Said.

13 And on the right-hand side we are looking at the  
14 bank statement of September for Cosmopolitan Business  
15 Solutions.

16 Q. Okay. So on the left-hand side, meal counts for the  
17 month of August?

18 A. Correct.

19 Q. Are those meal counts submitted?

20 A. Yes, they were.

21 Q. And were payments made on those meal counts for 5,000  
22 meals a day seven days a week for the entire month of  
23 August?

24 A. Yes. We see that in the bank statement.

25 Q. Okay. Pulling up the, a couple entries from the

1 September bank statement for Cosmopolitan Business  
2 Solutions, what do you see here?

3 A. We see, again, three consecutive days payments from,  
4 electronic payments from Feeding Our Future to the Safari  
5 Restaurant account, for a combined total of over \$400,000.

6 Q. Okay. September 14th, 15th and 16th?

7 A. Correct.

8 Q. Okay. Jumping to Government Z18, which again  
9 corresponds to Count 18, what do we see in this check dated  
10 September 15th or the same date as that second funds  
11 transfer?

12 A. This check is from Cosmopolitan Business Solutions to  
13 Eidleh Inc. for \$5,000 and is signed by Salim Said.

14 Q. Okay. Now we've been going through bank records for an  
15 Associated Bank account like we just looked at?

16 A. Yes.

17 Q. What happened -- and we were just looking at the  
18 September statement. What happened to the Cosmopolitan  
19 Business Solutions bank account at Associated Bank around  
20 this time?

21 A. Around this time or immediately thereafter, Associated  
22 Bank proceeded to close down the accounts for Safari  
23 Restaurant.

24 Q. Why?

25 A. It was for suspected fraud.

1 Q. Okay. We were just talking about August and September.  
2 Let's jump ahead to October.

3 Okay. On the left-hand side are October meal  
4 counts, and on the right-hand side we're pulling up  
5 Cosmopolitan Business Solutions bank accounts, this time at  
6 Bridgewater Bank.

7 Do you see that?

8 A. I do.

9 Q. Okay. Let's talk about the meal counts on the left-hand  
10 side. It's for the month of what?

11 A. These are for the month of October 2020. And we see the  
12 numbers that are being claimed are in the 6,000 range.

13 Q. Okay. So last month we were at 5,000. Now we're at  
14 what?

15 A. 6,000.

16 Q. Okay. And the bank -- so this is for the month of  
17 October?

18 A. It is.

19 Q. And if we jump ahead or jump to the right, we see a bank  
20 statement for?

21 A. Cosmopolitan Business Solutions, doing business as  
22 Safari Restaurant.

23 Q. And this is for the month of?

24 A. November 2020.

25 Q. All right. And if we pull up this entry, what do we

1 see?

2 A. We see that on November 5th a deposit comes in from  
3 Feeding Our Future of approximately \$169,000. And on  
4 November 24th, in the bottom of the screen capture, another  
5 deposit from Feeding Our Future for approximately \$200,000  
6 comes in.

7 Q. Okay. So November we see two big deposits from Feeding  
8 Our Future. On the left-hand side, we see those claims for  
9 6,000 purported meals.

10 I'm going to pull up on the left Z19 and on the  
11 right Z20. And again Counts 19 and Counts 20, let's take  
12 these one at a time.

13 Count Z19, what do we see here?

14 A. We see we're looking at a check from Cosmopolitan  
15 Business Solutions to Eidleh Inc. for \$5,000, dated  
16 November 25th, 2020, signed by Salim Said.

17 Q. It's a day after one of those transfers?

18 A. Correct.

19 Q. And on the right-hand side, Count Z20, what do we see in  
20 this one?

21 A. Z20 shows a check from Cosmopolitan Business Solutions,  
22 also to Eidleh Inc., for another \$5,000. And the date is  
23 11/26 or 28. I can't really make it out.

24 Q. Okay. But November of 2020?

25 A. November of 2020.

1 Q. Same month that those two payments came in from Feeding  
2 Our Future?

3 A. Absolutely.

4 Q. Okay. We'll try and move this along a little bit, but  
5 we're back in the Bridgewater Bank financial statements for  
6 Cosmopolitan Business Solutions on page 35. And I'm pulling  
7 up a check from Feeding Our Future.

8 What do we see here?

9 A. We see a check from Feeding Our Future, dated  
10 December 29, 2020, to Safari/Cosmopolitan Business Solutions  
11 LLC, and the amount is over a million dollars.

12 Q. Okay. This one has a memo line of November 2020?

13 A. It does.

14 Q. Okay. December 29th, 2020, check for over a million  
15 dollars. Now pulling up Government Exhibit Z22,  
16 corresponding with Count 22, and what's this?

17 A. This is another check from Cosmopolitan Business  
18 Solutions to Idleh Inc. in the amount of \$7,000, dated  
19 January, again, 8, perhaps.

20 Q. January of 2021?

21 A. January of 2021.

22 Q. About a week and change after that million dollar check  
23 came in?

24 A. Correct.

25 Q. The same thing, Ms. Blackwell. We've got a split screen

1 with meal counts on the left and checks on the right. Why  
2 don't you walk the jury through what we're seeing in the  
3 meal count?

4 A. Sure. The meal count that we're looking out is filled  
5 out for the week of December 27, 2020. It purports to be  
6 submitted for 6,000 meals each day. It's signed by Salim  
7 Said, and it's dated December 31st, 2020.

8 Q. Okay. If we go through the meal count, we see 6,000  
9 meals a day throughout the month?

10 A. Yes, we do.

11 Q. Okay. And on the right, a Feeding Our Future check that  
12 we're all well versed in now. Can you tell the jury what we  
13 see here?

14 A. We see another check from Feeding Our Future to Safari  
15 Restaurant, dated January 14th, 2021, and the amount is for  
16 over \$1.1 million.

17 Q. Okay. On the left, claims for the month of December.  
18 On the right, a check for those claims for over  
19 \$1.1 million. Right?

20 A. Correct.

21 Q. I'm now pulling up Government Z24, corresponding with  
22 Count 24. The Feeding Our Future \$1.1 million check was  
23 dated January 24th. What's the date of this check?

24 A. January 18th, 2021.

25 Q. A couple days later, \$7,000 check from Cosmopolitan

1 Business Solutions to Eidleh Inc.

2 A. Yes.

3 Q. Okay. We're all becoming familiar with these  
4 side-by-sides, so go ahead and walk the jury through this  
5 snapshot that they are seeing.

6 A. This time the summer meal count sheet is filled out for  
7 the week of January 24th, 2021. The meals purported to be  
8 prepared and received, \$6,000 every day.

9 And on the right side, we're looking at a check  
10 from Feeding Our Future, deposited into the account of  
11 Safari Restaurant at Bridgewater Bank, dated February 18,  
12 2021, in the amount of \$1.1 million, over \$1.1 million.

13 Q. Okay. So on the left January claims, 6,000 meals a day,  
14 day after day week after week?

15 A. Day after day.

16 Q. And on the right-hand side is a check for January 2021.  
17 And it's for approximately 1.1 million?

18 A. It is.

19 Q. And it's dated what?

20 A. February 18th, 2021.

21 Q. Okay. Pulling up Government Exhibit Z32 or Count 32,  
22 tell the jury what we're seeing here.

23 A. We're looking at a check from Salim Limited LLC to  
24 Eidleh Inc., Mr. Eidleh's entity, for the amount of \$14,000.

25 And the date of the check is February 25, 2021.

1 Q. Okay. So this particular check is from Salim Limited?

2 A. It is.

3 Q. Who controls Salim Limited?

4 A. Salim Limited is controlled by Salim Said.

5 Q. Many of the other checks that we've seen are from  
6 Cosmopolitan --

7 A. From Safari Restaurant.

8 Q. Who controls that account?

9 A. There were three owners of Safari Restaurant, so there  
10 were three individuals who controlled that account.

11 Q. Is one of them Salim Said?

12 A. One of them was Salim Said, yes.

13 Q. And this check from Salim Limited to Eidleh Inc.  
14 happened approximately how long after that \$1.1 million  
15 check from Feeding Our Future?

16 A. Just a few days after.

17 Q. All right. Left-hand side is Government Exhibit B69 for  
18 February meal counts, and on the right-hand side are the  
19 same Bridgewater Bank bank statements.

20 Left-hand side, meal claims for the month of  
21 February?

22 A. Yes, this is for February 2021 in the 6,000 range of  
23 purported meals.

24 Q. And on the right-hand side, what do we see?

25 A. We see a check from Feeding Our Future to Safari

1 Restaurant, dated March 8, 2021, in the amount of over  
2 \$1 million, the memo line indicating it's for February 21st.

3 Q. A check signed by whom?

4 A. The check is signed by Aimee Bock.

5 Q. All right. And this memo line is for February 21st, the  
6 same month of the meal counts sheets that we just looked at?

7 A. Yes, it is.

8 Q. Check dated March 8, 2021?

9 A. Yes.

10 Q. Okay. Pulling up Government Exhibit Z34, Count 34, this  
11 is a check dated March 9th of 2021, one day after that  
12 million dollar check. Can you tell the jury what we see  
13 here?

14 A. We see a check from Salim Limited LLC to Hope Suppliers  
15 LLC in the amount of \$14,000.

16 Q. Okay. One day after that check came in?

17 A. Yes, the check is dated a day later.

18 Q. And that check is signed by who?

19 A. Salim Said who controls Salim Limited.

20 Q. Okay. I'll keep this going along and showing you some  
21 additional counts, but Z36. Pull up on the left Z36 and on  
22 the right Government's Z37, which correspond to two counts  
23 here.

24 Again, a check from on the left, Z36, a check from  
25 Cosmopolitan Business Solutions to Eidleh Inc.?

1 A. Yes. This check is in the amount of \$7,000 and is dated  
2 March 23rd, 2021, from Cosmopolitan Business Solutions to  
3 Eidleh Inc.

4 Q. And on the right we see another one?

5 A. Yes. A check for same amount, \$7,000, dated March 25,  
6 2021, from Salim Limited to Eidleh Inc.

7 Q. Okay. And March of 2021 are claims continuing to be  
8 submitted to Feeding Our Future?

9 A. Yes.

10 Q. Is Feeding Our Future continuing to make payments of  
11 large checks to Safari Restaurant for those claims?

12 A. Yes.

13 Q. And as we see here, what do we continue to see from  
14 Salim Limited LLC?

15 A. We continue to see payments going to Abdikerm Eidleh's  
16 entities.

17 Q. All right. One final one, Z38. We've now jumped ahead  
18 in time to May, May 27th of 2021, another check. Can you  
19 describe it for the jury?

20 A. Yes. Check, this check from Cosmopolitan Business  
21 Solutions is to Eidleh Inc. for \$14,000 and is dated May 27,  
22 2021.

23 Q. What was significant to you in the course of this  
24 investigation, based on reviewing the accounts for  
25 Mr. Eidleh, as well as reviewing the accounts for

1       Cosmopolitan Business Solutions and Feeding Our Future,  
2       about these continuing series of checks that we just went  
3       over?

4       A.   Well, Mr. Eidleh, as an employee of Feeding Our Future,  
5       was supervising the Safari sites, Safari site, and there was  
6       no reason for Cosmopolitan Business Solutions to be making  
7       payments to Mr. Eidleh while he was employed with Feeding  
8       Our Future and was actively supervising these sites.

9       Q.   What was your conclusion after your review of these  
10       financial statements?

11       A.   My conclusion was that they should not have been made to  
12       Mr. Eidleh for exercising oversight responsibilities over  
13       those sites.

14       Q.   Well, do you believe that Mr. Eidleh was providing  
15       legitimate oversight over these sites?

16       A.   I do not.

17       Q.   What do you believe he was doing?

18       A.   I believe he was maybe looking the other way.

19       Q.   Okay.  We've talked a lot about Salim Limited,  
20       Cosmopolitan Business Solutions, entities that are owned by  
21       Mr. Salim Said.

22                 I want to pivot and talk about some entities that  
23       are controlled by Ms. Bock.  Okay?

24       A.   Okay.

25       Q.   Are you familiar with an entity called The Learning

1 Journey?

2 A. Yes, I am.

3 Q. At a high level, can you explain to the jury what The  
4 Learning Journey is?

5 A. Learning Journey was a legal entity that was  
6 incorporated by Ms. Bock and a second individual, I believe  
7 in 2019. I can't remember the date, but it was towards the  
8 end of 2019.

9 Q. Okay. I'm pulling up what's already been admitted into  
10 evidence as Government Exhibit S19. And we're on page 54  
11 here. Can you tell the jury what this is?

12 A. Yes. It's a Certificate of Organization. It's a  
13 business filing with the office of the Secretary of State.

14 Q. Okay. And the entity here is The Learning Journey LLC?

15 A. Yes, it is.

16 Q. And the date that the certificate was issued is  
17 September 30 of 2019?

18 A. Yes, it is.

19 Q. So we're pre-COVID at this point?

20 A. We are.

21 Q. Going down to the next page, can you tell the jury --  
22 I'm going to highlight Article II.

23 Can you tell the jury who the registered office  
24 and agents are?

25 A. Yes. The registered office for this entity is 1506

1 Southcross Drive. The address is Southcross Drive,  
2 Burnsville, Minnesota. And the registered agents are Child  
3 Development Centers of Minnesota and Minority Child Care  
4 Centers of Minnesota respectively.

5 Q. Okay. So the agents are actually entities that are the  
6 agents; is that right?

7 A. Yes.

8 Q. Do you know who controls these two entities?

9 A. Yes. Child Development Centers of Minnesota was  
10 controlled by Ms. Bock. And Minority Child Care Centers of  
11 Minnesota by an individual named Shafi Qanyare.

12 Q. So joint ownership of The Learning Journey LLC?

13 A. Correct.

14 Q. Okay. And you mentioned -- let me pull that back up.

15 You mentioned the location here of Southcross  
16 Drive in Burnsville, Minnesota. Are you familiar with that  
17 location?

18 A. Yes, I am.

19 Q. In 2019 at the time that this Secretary of State filing  
20 was submitted, what was located at 1506 Southcross Drive in  
21 Burnsville, Minnesota?

22 A. I believe there was an existing daycare that belonged to  
23 Mr. Shafi Qanyare's relative, and there was some vacant  
24 space.

25 Q. Okay. Put another way, this was going to be the

1 location of this daycare center that's being registered  
2 here?

3 A. As we learned from the investigation, yes.

4 Q. Fast forward in time to 2020, and particularly after  
5 COVID started, is that what actually happened?

6 A. No.

7 Q. Are you familiar with the address here listed for Child  
8 Development Centers of Minnesota?

9 A. Yes, I am.

10 Q. Whose address is that?

11 A. This is the residential address for Ms. Aimee Bock.

12 Q. I'm showing you what's not been admitted yet into  
13 evidence as Government's Exhibit S2. Do you recognize this  
14 document?

15 A. I do.

16 Q. What is it?

17 A. It's a lease agreement. It looks to be the first page  
18 of a lease agreement between Carpenter Land Company as  
19 landlord and Aimee Bock and Shafi Qanyare together as  
20 tenant.

21 MR. JACOBS: Your Honor, we'd offer Government  
22 Exhibit S2.

23 THE COURT: Any objection to S2?

24 MR. UDOIBOK: No objection.

25 MR. MONTEZ: No objection.

1 THE COURT: S2 is admitted.

2 BY MR. JACOBS:

3 Q. All right. Ms. Blackwell, the jury is now looking at  
4 this. You mentioned it is a lease?

5 A. Yes, it is.

6 Q. And what is your understanding this is a lease for?

7 A. This lease is for the premises located at 1506  
8 Southcross Drive.

9 Q. Okay. And the lease is dated when?

10 A. It's dated October 3, 2019.

11 Q. Okay. So we have The Learning Journey as a registered  
12 entity, and you have a lease entered in October of 2019 for  
13 space for The Learning Journey.

14 Did anything happen in 2020 that changed the  
15 calculus about daycare centers?

16 A. Well, in 2020 COVID happened.

17 Q. And --

18 A. So it was not an ideal time for daycares to be opened.

19 Q. And from a high level or a general level, why not?

20 A. Well, there was a stay-at-home order and people are  
21 being discouraged from congregating together in close  
22 spaces, especially children.

23 Q. Not an ideal time to operate any business, right?

24 A. I would say not.

25 Q. But in particular, one involving lots of kids in close

1 spaces?

2 A. Correct.

3 Q. All right. Based on the investigation, did The Learning  
4 Journey ever open as a daycare center in that Southcross  
5 location?

6 A. No, it did not.

7 Q. So I referred to it as Southcross. What ended up  
8 opening in the Southcross location?

9 A. At 1506 Southcross Drive, there was a food site  
10 operating.

11 Q. And if the jury's heard testimony about a food site  
12 referred to as Southcross, is that the same location and  
13 site?

14 A. It was named after the location, yes.

15 Q. I'm showing you what's not been admitted into evidence  
16 yet as Government Exhibit S21.

17 Do you recognize this document?

18 A. Yes, I do.

19 Q. And what is it?

20 A. This is a communication from the Minnesota Department of  
21 Human Services to Ms. Bock.

22 MR. JACOBS: Your Honor, we'd offer Government  
23 Exhibit S21.

24 THE COURT: Any objection?

25 MR. UDOIBOK: No objection.

1 MR. MONTEZ: No objection.

2 THE COURT: S21 is admitted.

3 BY MR. JACOBS:

4 Q. Okay. Ms. Blackwell, you testified that you didn't  
5 believe that The Learning Journey ever opened as a daycare  
6 center.

7 I'm showing you a letter from the Department of  
8 Human Services, dated January 26th of 2021. And what is  
9 this letter?

10 A. This letter represents a notice of a withdrawn license  
11 application for license application number ending in 5195  
12 for child care center.

13 Q. Is it your understanding that in order to operate a  
14 daycare center, you need to receive a license from the State  
15 of Minnesota?

16 A. Absolutely.

17 Q. Okay. And in this particular case, what is Ms. Bock  
18 being informed by the Department of Human Services?

19 A. Minnesota DHS informs Ms. Bock that pursuant to  
20 Ms. Bock's application, pursuant to Ms. Bock's application  
21 for a license to provide child care services at the location  
22 of 1506 Southcross Drive West and the initial review of that  
23 application, following several attempts by DHS  
24 representatives to collect, to obtain that information from  
25 Ms. Bock, and they were unsuccessful, they ultimately in

1 January 26, 2021, considered that license application  
2 withdrawn.

3 Q. Okay. January of 2021, not operating as a daycare  
4 center?

5 A. Not operating as a daycare center.

6 Q. And did The Learning Journey ever receive a license to  
7 operate as a daycare center after this point in time?

8 A. No.

9 Q. Okay. We're in January of 2021 when this notice comes  
10 through. Who's paying the lease at the 1506 Southcross  
11 Drive at this point?

12 A. The lease payments are made by Ms. Bock.

13 Q. And are they made by her in her personal capacity?

14 A. No.

15 Q. How are these payments being made?

16 A. The payments come out of the Feeding Our Future account.

17 Q. Okay. And, again, in January of 2021, when this  
18 withdrawn license application comes down, what's going on at  
19 the Southcross site?

20 A. At the Southcross location, there are claims being  
21 submitted around this time.

22 Q. Being operated as a food site?

23 A. It was definitely operating as a food distribution site.

24 Q. Not a daycare center?

25 A. Not a daycare center.

1 Q. I'm showing you what's already in evidence as Government  
2 Exhibit V8, a CLiCS document.

3 Can you tell the jury what we see here?

4 A. We see information regarding the Southcross site,  
5 Southcross site, the site address, 1506 Southcross Drive,  
6 the approval effective date range, which is between  
7 October 2020 and April '21.

8 And we also see the contact information for the  
9 site.

10 Q. Who is listed under the contact information?

11 A. Ms. Bock is listed.

12 Q. Okay. And if we go down to page 5, it's a Minnesota  
13 Department of Education document, the food program site  
14 application supplement. Who is listed as a sponsor here?

15 A. The sponsor is Feeding Our Future.

16 Q. And what is the site name?

17 A. The site name is FOF Southcross.

18 Q. FOF, Feeding Our Future?

19 A. Yes.

20 Q. And if we go down to the middle of the document, it  
21 says, "Indicate the title/name of the person who will  
22 monitor the site and select which monitoring visits will be  
23 conducted."

24 What is the name and title of the site monitor?

25 A. The name listed is Hadith Ahmed as program support

1 staff.

2 Q. Mr. Ahmed, the same person that you testified about  
3 relating to his shell company Mizal Consulting yesterday?

4 A. Same one.

5 Q. And in the case, if we keep going down, we see another  
6 CLiCS document here. What time period is this one for?

7 A. The date range listed here is for June '21, all the way  
8 through April '22 for the Southcross site.

9 Q. Okay. And if we go down to page 11 during that same  
10 time frame you just talked about, who is the vendor for this  
11 Southcross site?

12 A. The vendor is an entity called Empire Cuisine & Market.

13 Q. Are you familiar with Empire Cuisine & Market?

14 A. Yes, I am.

15 Q. Who or what is Empire Cuisine & Market in the context of  
16 the Southcross site?

17 A. Empire Cuisine & Market was, was an entity owned and  
18 operated by Mr. Abdiaziz Farah and Mohamed Ismail, and they  
19 were supposedly the vendors for this site.

20 Q. Okay. So you already testified that The Learning  
21 Journey wasn't operating as a daycare center but instead was  
22 a food site. So let's take a look at what was actually  
23 happening during this time period. Okay?

24 Showing you what's already in evidence as  
25 Government Exhibit P37, and what is P37?

1 A. P37 looks to be the July documentation for the FOF  
2 Southcross site.

3 Q. Okay. And again, when we're talking about the  
4 Southcross site, it's that site on 1506 Southcross in  
5 Burnsville?

6 A. It is.

7 Q. And here what do we see?

8 A. We see the meal count form filled out for the week of  
9 July 8th through July 10th, 2021. Sponsor, Feeding Our  
10 Future. Site location, as I said, 1506 Southcross and the  
11 number of meals received and prepared over 1,600 Thursday,  
12 Friday and Saturday.

13 Q. Okay. So July 2021, not a daycare center?

14 A. Not a daycare center.

15 Q. A purported food site?

16 A. Yes.

17 Q. Do you recognize the signature here at the bottom?

18 A. Yes, I do.

19 Q. Whose signature is that?

20 A. The signature belongs to Mr. Abdiaziz Farah.

21 Q. And who is Mr. Farah?

22 A. Mr. Farah was the person who controlled, one of the two  
23 people who controlled Empire Cuisine & Market.

24 Q. Okay. So July 2021, food site. Showing you what's  
25 already admitted as Government P38, same claims from the

1 Feeding Our Future office, but this time for August?

2 A. For the month of August '21, yes.

3 Q. And in that claims site you see or in that claim folder  
4 you see invoices from Hope Suppliers?

5 A. Yes. Hope Suppliers LLC.

6 Q. And it's billed to the Southcross site?

7 A. It is.

8 Q. There's an individual Suad Muse who it's being billed  
9 to. Who is Suad Muse?

10 A. Suad Muse was the spouse of Abdikerm Eidleh.

11 Q. And remind us who Hope Suppliers is owned by?

12 A. Hope Suppliers is owned and controlled by Abdikerm  
13 Eidleh.

14 Q. Okay. Here we see another invoice, this time from an  
15 entity called Afrique Hospitality?

16 A. Yes, we do.

17 Q. And if we go down to page 14, we see something we're all  
18 very familiar with now, more meal counts. Can you tell the  
19 jury about these meal counts for the Southcross site in  
20 August of 2021?

21 A. In August of 2021, this meal count sheet purports to  
22 show meals received and prepared for over 1700 meals a day,  
23 every day, between Thursday, Friday, Saturday, and the  
24 signature of the individual filling this out is Suad Muse.

25 MR. JACOBS: Your Honor, this would be a good

1 breaking point if that's acceptable.

2 THE COURT: We can do that.

3 We'll return at 10:45.

4 All rise for the jury.

5 10:30 a.m.

6 **IN OPEN COURT**

7 **(JURY NOT PRESENT)**

8 THE COURT: We are in recess until 10:45.

9 (Recess taken at 10:30 a.m. till 10:48 a.m.)

10 10:48 a.m.

11 **IN OPEN COURT**

12 **(JURY PRESENT)**

13 THE COURT: You may all be seated.

14 And, Mr. Jacobs, you may continue.

15 MR. JACOBS: Thank you, Your Honor.

16 BY MR. JACOBS:

17 Q. Ms. Blackwell, when we left off before the break, we  
18 were looking at Government Exhibit P14, and we were talking  
19 about Southcross, Burnsville in the month of August.

20 Do you remember that?

21 A. I do.

22 Q. Okay. So let's just pick back up there and continue to  
23 go over this meal count sheet.

24 So the site here is what?

25 A. Right. The site is Southcross, Burnsville, sponsored by

1 Feeding Our Future.

2 Q. So we've been talking about Southcross a lot. This is a  
3 location that we saw in the lease way back when of the  
4 purported location for The Learning Journey; is that right?

5 A. It is.

6 Q. So moving on, who do we see as the site supervisor?

7 A. Site supervisor listed is Suad Muse.

8 Q. And remind the jury who Ms. Muse is.

9 A. Suad Muse is Abdikerm Eidleh's wife.

10 Q. All right. And just scrolling -- first of all, let's  
11 talk about the claims for this first week of August.

12 A. First week of August has claims in the 1700 range for  
13 the numbers of meals received/prepared and served to  
14 children Thursday, Friday, Saturday. The initials of the  
15 person taking the counts, SM correspond to Suad Muse.

16 Q. Okay. And flipping through to the week of August 8th  
17 and August 15th --

18 A. We see the numbers increase to the 1900 range.

19 Q. Apart from the numbers increasing, is everything else  
20 consistent?

21 A. Yes, the same site, the same supervisor, the same  
22 signature.

23 Q. Okay. And that continues throughout the month of  
24 August?

25 A. It does.

1 Q. Two meals, breakfast and lunch, a day?

2 A. Two meals, breakfast and lunch.

3 Q. I want to show you a document that's not yet in  
4 evidence. It's HH26. Do you recognize this document?

5 A. Yes, I do.

6 Q. What is it?

7 A. It's an agreement regarding the purchase of a business.

8 MR. JACOBS: Your Honor, we'd offer HH26.

9 THE COURT: Any objection?

10 MR. UDOIBOK: No objection.

11 MR. MONTEZ: No objection.

12 THE COURT: HH26 is admitted.

13 BY MR. JACOBS:

14 Q. All right. Ms. Blackwell, this purchase of a business  
15 agreement was found during the search of Mr. Abdulkadir  
16 Salah's residence?

17 A. It was.

18 Q. And we've just been talking about Southcross as a food  
19 site, right?

20 A. Yes.

21 Q. But can you remind the jury what that -- the original  
22 purpose of that Southcross location was for?

23 A. It was supposed to be a daycare that was going to be  
24 opened.

25 Q. Was it ever a daycare that was opened?

1 A. No.

2 Q. Okay. Let's walk through some of the details of the  
3 purchase -- of business agreement.

4 Now, first things first. What's a purchase of a  
5 business agreement?

6 A. It's an agreement between two parties to sell  
7 respectively to purchase a business.

8 Q. Okay. Is it a contract for the sale of a business?

9 A. It is a contract between the parties, yes.

10 Q. And in this particular case, can you tell the jury who  
11 the two parties of this contract are?

12 A. Yes. The parties, the seller is The Learning Journey  
13 child care of 1506 Southcross Drive West in Burnsville. And  
14 the purchaser is Cosmopolitan Business Solutions at 3010  
15 Fourth Ave South, Minneapolis.

16 Q. Okay. So the seller is The Learning Journey.

17 A. The seller is The Learning Journey.

18 Q. That's the business being sold?

19 A. That is purportedly the business being sold, yes.

20 Q. And the purchaser is Cosmopolitan Business Solutions?

21 A. Yes.

22 Q. Safari Restaurant?

23 A. Safari Restaurant.

24 Q. What does Safari Restaurant do?

25 A. It is a restaurant.

1 Q. Do they have any daycare centers?

2 A. They do not.

3 Q. Are they in the daycare space at all?

4 A. Not from the review of the records, no.

5 Q. What's the date that this purchase of a business  
6 agreement was entered into?

7 A. The date listed is August 13th, 2021.

8 Q. Okay. Middle of August 2021. Can you remind the jury  
9 what we just saw about what was purportedly happening at  
10 this very location in August of 2021?

11 A. We just saw meal count sheets filled out for the entire  
12 month of August 2021 at the Southcross location.

13 Q. So I want to walk through a few details of this purchase  
14 agreement, and the first is the background here. It says --  
15 can you read this to the jury?

16 A. The background describes the seller, which carries on  
17 the business of child care at 1506 Southcross Drive West,  
18 Burnsville, Minnesota.

19 Q. According to this document, the seller is operating a  
20 child care business at 1506 Southcross?

21 A. This is what it says.

22 Q. Did you ever see any evidence of a daycare business  
23 being operated at that site?

24 A. No, I did not.

25 Q. Okay. And moving on to page 2, there's a conversation

1 about assets. I don't want to make this too complicated,  
2 but in the context of a contract to sell a business, can you  
3 explain to the jury what an asset is?

4 A. An asset would be tangible objects that are being  
5 transferred during the sale of a business.

6 Q. What you're selling?

7 A. Exactly. The objects that you are selling.

8 Q. Okay. And in this case they are selling two different  
9 kinds of assets; is that right?

10 A. Yes.

11 Q. The first is all equipment used inside carrying on the  
12 seller.

13 What do you understand that to mean?

14 A. Plant, property, equipment, things of that nature.

15 Q. And in the case --

16 A. Inventory.

17 Q. And in the case of The Learning Journey, did you see any  
18 equipment used in carrying on the seller?

19 A. Outside of a few chairs, tables, such as small pieces of  
20 furniture, no, I did not.

21 Q. Okay. And remind the jury. Did The Learning Journey or  
22 Ms. Bock own that location?

23 A. No. They were leasing it.

24 Q. Did they have any real assets or real estate or anything  
25 else that they were selling?

1 A. No.

2 Q. And Number 2 is the goodwill of the seller, including  
3 the business name. Can you explain to the jury what  
4 goodwill is?

5 A. Goodwill is a concept that refers to the ability of a  
6 business to obtain and attract customers, and they retain  
7 those customers over the course of time.

8 Q. In other words, the intangible part of a business?

9 A. Yes, that would be intangible.

10 Q. So if the first part is many tables and chairs for a  
11 daycare center, the second part would be the customer base?

12 A. Yes, basically the customer base or the reputation of  
13 the seller or things of that nature.

14 Q. So for The Learning Journey in August of 2021, what was  
15 the customer base?

16 A. There was no customer base.

17 Q. What was the reputation?

18 A. It did not establish a reputation.

19 Q. What was the goodwill of The Learning Journey in August  
20 of 2021?

21 A. I would say there was no goodwill.

22 Q. All right. Moving on down this contract to paragraph 3,  
23 the purchase price. This goes on to say that, "The parties  
24 agree that the purchase price for the assets," that's the  
25 two things we just talked about, "will be allocated as

1 follows."

2 Can you tell the jury what the purchase price for  
3 those two assets were?

4 A. The total purchase price is listed as \$310,000 divided  
5 as follows: Business equipment, \$75,000; and goodwill,  
6 \$235,000.

7 Q. Okay. So business equipment, that's the little tables  
8 and chairs you mentioned?

9 A. That would be the business equipment, yes.

10 Q. Purportedly selling that for \$75,000?

11 A. (Moves head up and down.)

12 Q. And goodwill is the reputation of The Learning Journey?

13 A. Yes.

14 Q. The nonfunctioning daycare center?

15 A. The nonfunctioning daycare center, yes.

16 Q. And what price is put on the reputation of a  
17 nonfunctioning daycare center here?

18 A. \$235,000.

19 Q. For a total purchase price of what?

20 A. \$310,000.

21 Q. And if we go down to the bottom here to the signature  
22 page on page 11, we can see that this was executed on what  
23 date?

24 A. The date is August 13th, 2021.

25 Q. Okay. And it looks like because this contract is

1 between The Learning Journey child care and Cosmopolitan  
2 Business Solutions, it's signed by a representative of each  
3 of those; is that right?

4 A. Correct.

5 Q. Who signs on behalf of The Learning Journey child care?

6 A. For The Learning Journey, the signature belongs to Aimee  
7 Bock.

8 Q. And it looks like there's a witness as well for each?

9 A. There is a witness.

10 Q. Do you recognize the signature of the witness.

11 A. Yes, I do.

12 Q. Whose signature is it?

13 A. The signature belongs to Ms. Ikram Mohamed.

14 Q. Ikram Mohamed, the same woman who owned the shell  
15 company IM Consultation that you testified about yesterday?

16 A. Yes, the same one.

17 Q. All right. Moving on to the next line item,  
18 Cosmopolitan Business Solutions, who signs on behalf of  
19 Cosmopolitan?

20 A. The signature on the Cosmopolitan Business Solutions  
21 belongs to Mr. Abdulkadir Salah.

22 Q. Okay. And also a witness for that one?

23 A. There was also a witness for Cosmopolitan.

24 Q. Who signed as the witness for Cosmopolitan?

25 A. The signature for Cosmopolitan's witness is Salim Said.

1 Q. I'm showing you what has not admitted into evidence as  
2 Government Exhibit S11. What's S11?

3 A. It, it is a check issued by Cosmopolitan Business  
4 Solutions.

5 Q. Okay. The check and how much --

6 MR. JACOBS: Your Honor, we'd offer Government  
7 S11.

8 THE COURT: Any objection?

9 MR. UDOIBOK: No objection.

10 MR. MONTEZ: No objection.

11 THE COURT: S11 is admitted.

12 BY MR. JACOBS:

13 Q. Okay. So we're now looking at a check from Cosmopolitan  
14 Business Solutions?

15 A. Yes, we are.

16 Q. Safari?

17 A. Safari Restaurant.

18 Q. And it's to Aimee Bock?

19 A. It is to Aimee Marie Bock.

20 Q. The date is what?

21 A. The date is August 13th, 2021.

22 Q. Same date as the contract that we just looked at?

23 A. It is the same date.

24 Q. And the amount of the check is how much?

25 A. The amount is \$310,000.

1 Q. Same amount agreed to as a purchase price in that  
2 contract?

3 A. The same amount.

4 Q. I'm showing you Government Exhibit S12, which is not yet  
5 admitted into evidence.

6 Ms. Blackwell, have you had a chance to review  
7 Government Exhibit S12?

8 A. Yes, I have.

9 Q. What is it?

10 A. It is a video recorded at a bank branch.

11 MR. JACOBS: Your Honor, we'd offer Government  
12 S12.

13 THE COURT: Any objection?

14 MR. UDOIBOK: No objection.

15 MR. MONTEZ: No objection.

16 THE COURT: S12 is admitted and may be published.

17 BY MR. JACOBS:

18 Q. All right. Ms. Blackwell, we're playing S12.

19 (Video recording played)

20 Q. Can you tell the jury what we're seeing here?

21 A. We're seeing a video of Ms. Bock walking into a U.S.  
22 Bank branch location on August 13th, 2021, and handing the  
23 bank teller a document, which then she signs on the back.

24 Q. Okay. So the date of this video is August 13th?

25 A. It is.

1 Q. Same date that that contract was signed?

2 A. Same date.

3 Q. Same date that that check was signed?

4 A. Same date.

5 Q. And what is Ms. Bock depositing in this video?

6 A. She's depositing the cashier's check we just looked at.

7 Q. Do you know what account Ms. Bock deposited that check  
8 into?

9 A. Yes. She deposited it into her personal account.

10 Q. And when we were talking at the very outset about The  
11 Learning Journey, we looked at Government Exhibit S19, which  
12 is the Secretary of State filing for The Learning Journey.

13 Do you remember that?

14 A. That's correct.

15 Q. And how many organizers or owners were there of The  
16 Learning Journey?

17 A. There were two LLC members.

18 Q. And can you remind the jury who those two entities were  
19 owned or controlled by?

20 A. Yes. The first one was Child Development Centers of  
21 Minnesota, and the second one was Minority Child Care  
22 Centers of Minnesota.

23 Q. And who are those owned or controlled by, those specific  
24 entities?

25 A. The first one was controlled by Ms. Aimee Bock. The

1 second one by her business partner, Shafi Qanyare.

2 Q. Okay. And after Ms. Bock deposited that \$310,000 check,  
3 did you see any evidence of a payment to Mr. Qanyare?

4 A. No, I did not.

5 Q. So we just looked at a contract for the sale of a  
6 purported daycare center and a check deposited for the sale  
7 of that purported daycare center on August 13th of 2021.

8 I want to talk about what was happening at the  
9 Southcross location at that time. Okay?

10 A. Okay.

11 Q. I'm pulling up what's in evidence as Government  
12 Exhibit P44. And, Ms. Blackwell, can you tell the jury what  
13 this email is?

14 A. This email is an email sent from Aimee Bock to the  
15 claims CACFP, claims@feedingourfuturemn.org. Subject line  
16 Southcross, Burnsville, August and September. September,  
17 one week claims, and it includes attachments that are just  
18 invoices and claims.

19 Q. Okay. So the bottom email, Mr. Eidleh sends to Ms. Bock  
20 some attachments for claims for the Southcross, Burnsville  
21 location?

22 A. That is correct.

23 Q. And then Ms. Bock forwards those to claims at Feeding  
24 Our Future?

25 A. That is correct.

1 Q. The date of this email is September 7th of 2021?

2 A. September 7th.

3 Q. And this email attaches some meal counts for Southcross  
4 that we've looked at before. Do you recognize these?

5 A. I do.

6 Q. In this particular case it's for the month of August.

7 Now, the Southcross -- The Learning Journey  
8 daycare center at the Southcross location was sold on what  
9 date?

10 A. August 13th.

11 Q. Is there any distinction or differentiation amongst the  
12 meal claims for that site after August 13th?

13 A. No, there isn't.

14 Q. And in fact, those claims go into September.

15 A. Yes, they do.

16 Q. Weeks after the sale of the daycare center at that  
17 location?

18 A. That's correct.

19 Q. Showing you what's already in evidence as Government  
20 Exhibit W59, Ms. Blackwell, what are we seeing on page 37 of  
21 Government Exhibit W59?

22 A. We're seeing a check payment from Feeding Our Future to  
23 Hope Suppliers, dated October 8th, 2021, in the amount of  
24 \$343,064.

25 Q. Okay. And Hope Suppliers is what?

1 A. Hope Suppliers is the entity that is owned and  
2 controlled by Abdikerm Eidleh.

3 Q. And if you look down in the memo line here, it says  
4 September of 2021?

5 A. Yes, it does.

6 Q. Or it says SC9.21. What do you understand that to mean?

7 A. SC is an abbreviation for Southcross.

8 Q. So the month after Ms. Bock purportedly sold a daycare  
9 center at Southcross, she's providing a check to Mr. Eidleh  
10 for how much?

11 A. For over \$343,000.

12 Q. Okay. And we looked at some of the CLiCS data for this  
13 site, but who was operating this site prior, or at this time  
14 and prior?

15 A. At this time and prior, it was a Feeding Our Future  
16 site.

17 Q. It was FOF Southcross?

18 A. It was FOF Southcross.

19 Q. Feeding Our Future?

20 A. Correct.

21 Q. The month before and the month during the sale of this  
22 purported daycare center?

23 A. That's correct.

24 Q. Okay. That was August and September of 2021. I want to  
25 jump ahead to October of 2021.

1 I'm showing you what's already in evidence as  
2 Government Exhibit P41. What is P41?

3 A. P41 is a folder relating to documentation for  
4 October 2021 for the Southcross site.

5 Q. Okay. October 2021, Southcross. I'm going down to the  
6 second page here. This is a meal count. Can you tell the  
7 jury the details of this meal count?

8 A. Sure. This meal count is filled out for the first week  
9 of October 2021 for the site Southcross under the  
10 sponsorship of Feeding Our Future. And supervisor listed is  
11 Kiin Anod.

12 Q. Okay. Do you know who Kiin Anod is?

13 A. Kiin Anod is an employee of Bet on Better Future.

14 Q. Or put another way, do you recognize that name and that  
15 signature from anywhere?

16 A. I do.

17 Q. I'm showing you what's already in evidence as  
18 Government's GG4. This is another meal count. Do you know  
19 where this one was found?

20 A. This one I believe was found at the search warrant  
21 executed at Mr. Salim Said's residence.

22 Q. Site here is what?

23 A. Southcross.

24 Q. And supervisor is who?

25 A. Supervisor listed is Kiin Anod.

1 Q. And what about the rest of the details?

2 A. The rest of the details are not filled in. They are  
3 left blank.

4 Q. Except for one thing at the bottom?

5 A. Except for the signature field.

6 Q. Okay. Blank Southcross meal counts found at the  
7 residence of Mr. Said?

8 A. Blank that -- blank meals, yes.

9 Q. Okay. Going back to P41, the October claims. So what  
10 entity is now operating the Southcross site?

11 A. It is the Bet on Better Future.

12 Q. And is Bet on Better Future, is there a connection  
13 between Bet on Better Future and Safari?

14 A. Yes, there is.

15 Q. We'll talk about that in a minute, but is it a financial  
16 connection?

17 A. There was a financial connection, yes.

18 Q. Okay. So just to orient the jury, in August and  
19 September, who is operating the site?

20 A. August and September, Feeding Our Future is operating  
21 the site.

22 Q. And in August of 2021 there's a purported sale of a  
23 daycare center at that site?

24 A. August 13th, yes.

25 Q. For \$310,000?

1 A. Yes, there is.

2 Q. And then in October, who is operating that site?

3 A. An entity that is financially connected to the Safari  
4 group.

5 Q. Going through October, similar claims for that month.

6 Okay. Pulling up Government Exhibit P42. What's  
7 this folder that we see from the Feeding Our Future, found  
8 at the Feeding Our Future office?

9 A. This is the November folder for Bet on Better Future,  
10 Southcross.

11 Q. Okay. So now we're into November. Who -- walk the jury  
12 through this meal count?

13 A. This meal count is filled out for the week of  
14 November 7th, 2021, for the site named Bet on Better  
15 Future/Burnsville under the sponsorship of Feeding Our  
16 Future.

17 Q. Okay. To be clear, not a daycare center?

18 A. Not a daycare center.

19 Q. A purported, purported site distributing thousands of  
20 meals every day, every day throughout the month?

21 A. Over 1700 every day.

22 Q. All right. Moving on to Government Exhibit P43, what is  
23 this document?

24 A. This is the December folder for Bet on Better Future,  
25 Southcross.

1 Q. Okay. Another meal count, this time for the following  
2 month. What do we see?

3 A. For December 2021, we see meal counts filled out for, in  
4 the 2200 range for the first week of December for, at the  
5 site Bet on Better Future/Southcross.

6 Q. Moving throughout the month, do you see any variation  
7 throughout these meal counts?

8 A. No. The numbers are identical each day every day week  
9 after week.

10 Q. And again the site is continuing to be sponsored or  
11 operated by Bet on Better Future?

12 A. Correct.

13 Q. Still at that Southcross location?

14 A. Correct.

15 Q. I'm showing you what's not yet in evidence as Government  
16 Exhibit M1.

17 Your Honor, we'd offer M1.

18 THE COURT: Any objection?

19 MR. UDOIBOK: No objection.

20 MR. MONTEZ: No objection.

21 THE COURT: M1 is admitted.

22 BY MR. JACOBS:

23 Q. Ms. Blackwell, we're looking at a Secretary of State  
24 Certificate of Incorporation here for what entity?

25 A. This is a business filing for Bet on Better Future.

1 Q. Okay. And what is the date that this was issued?

2 A. June 21st, 2021.

3 Q. Just a few months before the sale of this purported  
4 daycare center?

5 A. Just a few months.

6 Q. And if we go down to the incorporators, we see three  
7 names here. Are you familiar with these names?

8 A. I am familiar with one of the names.

9 Q. Which name?

10 A. The name in the middle, which is Abdulkadir Salah.

11 Q. Who is Abdulkadir Salah?

12 A. Abdulkadir Salah is one of the three owners of Safari  
13 Restaurant.

14 Q. Okay. One of the three owners of Safari Restaurant and  
15 now one of the three owners of Bet on Better Future?

16 A. Correct.

17 Q. The entity purportedly operating a food site at the  
18 Southcross location?

19 A. Correct.

20 Q. Okay. I'm pulling up Government Exhibit W2, which is  
21 the account records for Feeding Our Future. And we're at  
22 page 305 here. What do we see on page 305?

23 A. Here we see a check from Feeding Our Future to Bet on  
24 Better Future.

25 Q. Okay. And let's talk about some of the details here.

1 The date of this particular check is what?

2 A. The date is December 3, 2021.

3 Q. And the amount is how much?

4 A. The amount is over \$189,000.

5 Q. Okay. And if we go down to the lower left-hand corner  
6 in the memo, what do you see?

7 A. The purported purpose for the payment is Southcross and  
8 October 21st notation.

9 Q. Okay. So a month and a half after receiving a \$310,000  
10 check for the sale of a daycare center, what do we see  
11 happening at that location?

12 A. We see that that location continues to receive  
13 reimbursements for claims submitted from Feeding Our Future.

14 Q. Okay. And that location being Bet on Better Future?

15 A. That location is operated now by Bet on Better Future.

16 Q. And who signs that check to Bet on Better Future?

17 A. The signature on the check belongs to Ms. Bock.

18 Q. All right. Moving down one. Another check to Bet on  
19 Better Future?

20 A. Yes. This is a second check issued at the beginning of  
21 December 2021 from Feeding Our Future to Bet on Better  
22 Future. This is in the amount, in the amount of  
23 approximately \$24,000.

24 Q. All right. And one more as we continue to go down.

25 This is a check dated December 22nd, 2021?

1 A. Yes, this check, this check is to Bet on Better Future  
2 for the amount of approximately \$238,000, and information  
3 listed on the memo line is October 21st and November 21st  
4 Southcross.

5 Q. Okay. So claims for the month of October to November at  
6 the site of that purported daycare center?

7 A. Correct.

8 Q. Now, the checks from Feeding Our Future to Bet on Better  
9 Future stop after this December check. There's no January  
10 check. Do you know why?

11 A. Because the investigation went overt.

12 Q. And what happened after January 20th of 2021?

13 A. The activity was shut down.

14 Q. So we're talking about Bet on Better Future, and you  
15 mentioned that there's a connection to Cosmopolitan Business  
16 Solutions.

17 Do you recall that?

18 A. Correct.

19 Q. And we saw the Secretary of State filing with one of the  
20 coowners?

21 A. Yes.

22 Q. Now I want to pull up what's in evidence as X10, and  
23 it's another one of these sources and uses charts. And this  
24 time it's for what entity?

25 A. This one is filled out for Bet on Better Future.

1 Q. Okay. And there's a review period here, and it starts  
2 on November 18th of 2021. Why did you pick that date to  
3 start the review period?

4 A. Well, this date corresponds with the account opening  
5 date.

6 Q. Okay. So the account was actually opened in November of  
7 2021?

8 A. Correct.

9 Q. Now let's go and focus on the sources of funds here. It  
10 looks like there are two different sources of funds coming  
11 into this account. What are they?

12 A. Well, over \$1.4 million comes from Feeding Our Future,  
13 so food program income. And there's a second source of  
14 funds, which is a cash opening deposit.

15 Q. So all but the initial \$200 opening deposit came from  
16 Feeding Our Future?

17 A. That is correct, virtually all.

18 Q. Including those several checks that we just looked at  
19 for the Southcross location?

20 A. Correct.

21 Q. And let's look now -- we've been focusing a lot on the  
22 sources of funds, but I want to talk about the uses of funds  
23 here.

24 Can you tell the jury what we see when we jump  
25 over to the right side and look at the use of funds?

1 A. We see that the main withdrawals from the accounts, from  
2 this, from this particular accounts were made to  
3 Cosmopolitan Business Solutions, over \$790,000; and to Olive  
4 Management Inc., around \$240,000.

5 Q. Okay. So we see over \$790,000 being transmitted to  
6 Cosmopolitan Business Solutions, the same entity that wrote  
7 that check for \$310,000?

8 A. It is the same entity.

9 Q. And what was that check for \$310,000 purportedly for?

10 A. It was purportedly for the sale of a daycare center.

11 Q. And after that, after that check for \$310,000 was  
12 deposited by Ms. Bock, what happened at the Southcross site?

13 A. The Southcross site purportedly continued to be a food  
14 site.

15 Q. And where do we see the funds that were deposited from  
16 Feeding Our Future to Bet on Better going?

17 A. It goes back to the Safari group.

18 Q. I want to show you what's not yet in evidence as  
19 Government Exhibit S29.

20 Your Honor, we'd offer S29.

21 THE COURT: Any objection?

22 MR. UDOIBOK: No objection.

23 MR. MONTEZ: No objection.

24 THE COURT: S29 is admitted.

25

1 BY MR. JACOBS:

2 Q. All right. Ms. Blackwell, the jury's now looking at S29  
3 with me, and it looks a little complicated, but can you  
4 explain to us what we're seeing here in S29?

5 A. In S29 we're looking at a summary chart that depict  
6 visually the flow of funds from Feeding Our Future to Safari  
7 Restaurant, and ultimately a portion of it is being paid out  
8 to Ms. Bock.

9 Q. Okay. So if we talk about tracing in the context of a  
10 forensic accountant, what's tracing?

11 A. Tracing means identifying -- tracing means connecting  
12 the beneficiary of the funds to the sourcing of the funds.

13 Q. And is that what you did in this particular chart here  
14 in S29?

15 A. Yes.

16 Q. Can you explain to the jury where the source of the  
17 \$310,000 payment from Safari Restaurant to Ms. Bock came  
18 from?

19 A. The original source of the funds is funds being paid  
20 from Feeding Our Future to Safari Restaurant.

21 Q. And you see they go through a number of different  
22 accounts. Safari Restaurant account for Associated Bank?

23 A. Yes.

24 Q. What happened to that account?

25 A. That account was closed down by the bank.

1 Q. And then you see it going through a series of 3017 LLC  
2 accounts?

3 A. Yes.

4 Q. What's 3017 LLC?

5 A. 3017 LLC was an entity that was controlled by Abdulkadir  
6 Salah.

7 Q. Okay. And it looks like it goes through accounts for  
8 Associated Bank, Bridgewater Bank, Wells Fargo Bank and Bell  
9 Bank.

10 Do you have any idea why the funds were  
11 transferred to multiple different accounts?

12 A. This corresponds with the sequence of accounts that were  
13 opened by 3017 LLC because the accounts were closed by the  
14 banks. This is the correspondence in the order in which  
15 they were closed down by the banks.

16 Q. And ultimately the funds that we see at the top, which  
17 correspond to what?

18 A. These are combined totals that were paid from accounts,  
19 from Feeding Our Future to Safari Restaurant, Safari  
20 Restaurant accounts and to 3017 LLC.

21 Q. They end up in which account?

22 A. They end up ultimately in the Bell Bank account  
23 controlled by, owned by Safari Restaurant.

24 Q. And on August 13th of 2021, what happens from that  
25 Safari account at Bell Bank?

1 A. That cashier's check for \$310,000 is issued to Aimee  
2 Marie Bock.

3 Q. All from program money?

4 A. Virtually all.

5 Q. Okay. And then finally showing you what's already in  
6 evidence as Z40, again that corresponds to Count 40 in the  
7 indictment?

8 A. Count 40.

9 Q. What's Government's Z40, just to bottom line it for the  
10 jury.

11 A. It's a cashier's check issued from Cosmopolitan to Aimee  
12 Marie Bock for \$310,000, dated August 13, 2021.

13 Q. What was deposited where?

14 A. That was deposited in Ms. Bock's personal account at  
15 U.S. Bank.

16 Q. All right. Ms. Bock -- I want to pivot a little bit  
17 from The Learning Journey to now focus your attention in the  
18 time period of December of 2021. Okay?

19 The jury has already heard testimony about a  
20 meeting that took place in the office of Feeding Our Future  
21 in that time frame. Are you generally familiar with that  
22 meeting?

23 A. Yes, a meeting at Feeding Our Future.

24 Q. Pulling up what is already in evidence is Government  
25 Exhibit S32, and the jury heard testimony from Mr. Awale

1 about this check, but can you tell the jury what you see  
2 here?

3 A. Yes. A payment, a check payment from Sambusa King, an  
4 entity controlled by Mr. Awale, to Feeding Our Future for  
5 \$5,000, dated December 23rd, 2021.

6 Q. Now, we have seen lots and lots and lots of checks from  
7 Feeding Our Future, but in your review of the financials for  
8 Feeding Our Future, did you see many checks going into  
9 Feeding Our Future?

10 A. Not very many.

11 Q. This is one example?

12 A. This is one example, yes.

13 Q. I am pulling up what's in evidence as Government  
14 Exhibit W2a. I'm actually pulling up what's already in  
15 evidence as Government Exhibit W2b.

16 And, Ms. Blackwell, what are contained in the  
17 subset of the Feeding Our Future financials that are labeled  
18 Government Exhibit W2b?

19 A. W2b will contain the deposits, the deposit instruments  
20 and deposits into Feeding Our Future account.

21 Q. Okay. So we talked about this first check from Sambusa  
22 King?

23 A. Mm-hmm. Yes.

24 MR. JACOBS: Your Honor, with apologies, I'd offer  
25 Government's W29, W2b and W2c at this point.

1 THE COURT: Any objection?

2 MR. JACOBS: Excuse me, Your Honor. It would be  
3 W2a and W2b.

4 MR. UDOIBOK: No objection.

5 MR. MONTEZ: No objection.

6 THE COURT: And not 29?

7 MR. JACOBS: We would offer Government W29.

8 THE COURT: All right. W29, 2a -- and W2b, W2a,  
9 all admitted.

10 BY MR. JACOBS:

11 Q. All right. Ms. Blackwell, we just talked about this  
12 check from December of 2021, but I want to page through the  
13 checks that are coming in to Feeding Our Future.

14 This one is dated 12/1/2021?

15 A. It is.

16 Q. Are you familiar with Metro Area Catering?

17 A. Yes. Metro Area Catering is an entity owned and  
18 controlled by Khadra Hashi, and it purported to act as a  
19 vendor and -- as a vendor for Feeding Our Future.

20 Q. Okay. Another one dated 12/10 of 2021 for \$7,500. This  
21 one from Central Deli and Coffee. Are you familiar with  
22 that entity?

23 A. Yes.

24 Q. What is it?

25 A. Central Deli and Coffee is an entity related to Feed

1 Bank, which was a participant in the food program under  
2 Feeding Our Future.

3 Q. Okay. And going down to the lower left-hand corner,  
4 there's a memo line. What does it say?

5 A. It says Donation.

6 Q. Okay. Continuing to page through here, there's another  
7 check from 12/10 for \$5,000. This one from Ayan Ahmed?

8 A. Correct. Ayan Ahmed and Fadumo J. Abdinur?

9 Q. In connection to the Federal Child Nutrition Program?

10 A. Yes. Faduma J. Abdinur is connected to Tasho, which was  
11 a participant in the food program.

12 Q. And in fact when we were going through those summary  
13 charts relating to Mr. Eidleh, did we see large payments  
14 from Tasho to Mr. Eidleh's various accounts?

15 A. Yes, we did.

16 Q. Another one from the end of November. Here we see a  
17 check from 12, December 1st, 2021, for \$20,000. This one is  
18 from who?

19 A. This one is from S & S Catering Inc., the entity  
20 controlled by Qamar Hassan.

21 Q. Now this one is dated February of 2021. Did you see  
22 many checks to Feeding Our Future from that time period?

23 A. No, not really.

24 Q. Almost all of the ones that we've just flipped through  
25 are from December of 2021?

1 A. Correct.

2 Q. This one is from December of 22, for \$10,000 Green  
3 Basket?

4 A. Yes.

5 Q. Connection to the Federal Child Nutrition Program?

6 A. Yes, Green Basket is connected to the Federal Child  
7 Nutrition Program.

8 Q. All right. We're on page 23, another check. This one  
9 for \$50, again Donation?

10 A. Again Donation in the memo line.

11 Q. Mako Child Care Center on page 25?

12 A. Yes, this check is for \$5,000. Again Mako Child Care is  
13 connected to participants in the food program.

14 Q. Another check here from December 16th for \$10,000. This  
15 one from Afrique Hospitality Group?

16 A. Yes.

17 Q. Connection to the Federal Child Nutrition Program?

18 A. Absolutely.

19 Q. In fact, did we see an invoice from them pertaining to  
20 the Southcross site?

21 A. Yes, we did.

22 Q. All right. So check after check from this time period,  
23 Oromia Feeds LLC?

24 A. Oromia Feeds LLC is connected to Shamsia Hopes.

25 Q. This check from December 16th for \$10,000?

1 A. Correct.

2 Q. And when we were looking at those charts for  
3 Mr. Eidleh's entities, did we see large payments from Oromia  
4 Feeds and Shamsia Hopes?

5 A. Yes, we did.

6 Q. Star Distribution?

7 A. Star Distribution controlled by one of Ikram Mohamed's  
8 family members.

9 Q. Okay. And yesterday we saw some large payments from  
10 Star Distribution to the IM Consultation account?

11 A. Correct.

12 Q. And here we see a check from Star Distribution to  
13 Feeding Our Future for \$65,000?

14 A. This one is for \$65,000 and purports to be for donations  
15 2021.

16 Q. In total during this time period around December of  
17 2021, how much in incoming checks did you see to Feeding Our  
18 Future from entities associated with the Federal Child  
19 Nutrition Program?

20 A. I believe it was around \$180,000.

21 Q. And was that consistent with your review of the  
22 financial statements for Feeding Our Future or did it  
23 differ?

24 A. It differed in the sense that they all concentrated  
25 around the time frame of December 2021, at the end of the

1 December 2021.

2 Q. Did you see big donation checks in 2020?

3 A. No, I did not.

4 Q. Did you see big donation check in the first half of  
5 2021?

6 A. No, I did not.

7 Q. After reviewing these financials and these checks, what  
8 was significant about, what was significant to you about  
9 seeing these checks now coming in to Feeding Our Future?

10 A. They seem to be unusual in the sense that they, they all  
11 concentrated in the month of December and were deposited in  
12 one deposit in the account of Feeding Our Future.

13 Q. Now, I want to pivot a little bit from a donation to  
14 something called GoFundMe. Are you familiar with GoFundMe?

15 A. Yes, I am.

16 Q. What is GoFundMe, for those of us who might not know  
17 about it?

18 A. GoFundMe is a platform that is used by people who want  
19 to conduct fundraising for various causes, and they collect  
20 donations from member of the, members of the general public.

21 Q. Like crowd sourcing or crowd --

22 A. Crowd sourcing, correct.

23 Q. Pulling up what is not yet in evidence as Government  
24 Exhibit S30. And, Ms. Blackwell, do you recognize this  
25 document?

1 A. I do.

2 MR. JACOBS: Your Honor, we'd offer Government  
3 Exhibit S30.

4 THE COURT: Any objection?

5 MR. UDOIBOK: No objection.

6 MR. MONTEZ: No objection.

7 THE COURT: S30 is admitted.

8 BY MR. JACOBS:

9 Q. All right. Ms. Blackwell, now that the jury can see  
10 this, can you tell them what we're looking at here?

11 A. We are looking at the screen capture of a web page for a  
12 fundraiser that is titled "Feed MN."

13 Q. All right. Feed MN, and if we look at the logo here --

14 A. Underneath that the logo belongs to the Feeding Our  
15 Future organization.

16 Q. Okay. And this is a snapshot in time, but what's the  
17 amount raised here?

18 A. The total amount listed for the raised amount is  
19 \$73,985.

20 Q. Okay. And here we see the text of the fundraising page,  
21 and it says, "A few words from Aimee."

22 And can you read that first part off?

23 A. Sure. It offers a bit of background. "Here at Feeding  
24 Our Future, we are driven by a single goal, making  
25 participation in the USDA Child and Adult Care Food Program

1 safe."

2 Q. If we scroll down to the second page, can you continue  
3 reading that?

4 A. "I would resume making participation safe and easy for  
5 our community partners. We ensure programs are easily able  
6 to receive funding to purchase nutritious meals and snacks.  
7 Feeding Our Future is committed to ending childhood hunger  
8 in Minnesota.

9 "With your generous donation, we can continue to  
10 fight to ensure that all of our children go to bed full.  
11 Your donations will go to support the refugees' food  
12 stability, homelessness, children, emergency food  
13 assistance, migrant community outreach, after school meals  
14 and snacks.

15 "The tragedy of childhood hunger is real in  
16 Minnesota, but we can make a real difference. Help make a  
17 difference by donating to Feeding Our Future. Thank you."

18 Q. Okay. At the time that this was posted, about how many  
19 meals had been served under, had purportedly been served  
20 under the sponsorship of Feeding Our Future?

21 A. Millions.

22 Q. Tens of millions?

23 A. Tens of millions.

24 Q. And how much money had been distributed by Feeding Our  
25 Future for purportedly being a sponsor for those sites?

1 A. Millions.

2 Q. Hundreds of millions?

3 A. Hundreds of millions.

4 MR. UDOIBOK: Objection. Leading.

5 THE COURT: Sustained. The answer will be  
6 stricken.

7 BY MR. JACOBS:

8 Q. But how much money did Feeding Our Future receive at  
9 this point for purportedly being a sponsor of sites serving  
10 tens of millions of meals?

11 A. Over \$240 million.

12 Q. And what percentage did they get to keep?

13 A. Approximately 10 percent.

14 Q. But here we see a GoFundMe page.

15 A. Yes, we do.

16 Q. All right. Going back up to the first page, there's  
17 some information about the organizer. And can you read that  
18 to the jury?

19 A. Sure. "This fundraiser is organized by Feeding Our  
20 Future II."

21 Q. What is Feeding Our Future II?

22 A. Feeding Our Future is a legal entity that was  
23 incorporated by Aimee Bock.

24 Q. And Feeding Our Future II, similarly --

25 A. Yes.

1 Q. -- a nonprofit entity?

2 A. Similar, nonprofit.

3 Q. Okay. What is notable to you about seeing that this  
4 fundraiser is organized by Feeding Our Future II?

5 A. Well, it makes me think that Feeding Our Future II is a  
6 different entity than Feeding Our Future, with a separate  
7 organizational structure and separate board of directors, if  
8 you will, for a nonprofit.

9 Q. Okay. And could the funds that are raised by Feeding  
10 Our Future II here on this GoFundMe be transferred to  
11 Feeding Our Future?

12 A. Not unless there was an actual transfer from Feeding Our  
13 Future II to Feeding Our Future.

14 Q. Separate entities?

15 A. Separate. Separate entities.

16 Q. Now there are a bunch of names up here on the right-hand  
17 side of people who, who provided donations. Do you see  
18 that?

19 A. I do.

20 Q. Those are just some of the people?

21 A. Yes.

22 Q. I want to go down to the records provided by GoFundMe  
23 and go through some of the names of people who made, who  
24 made donations to this GoFundMe. So first of all, let me go  
25 up to the top, and under Donation History, there are a

1 couple of different categories.

2 There's created. That's the time and date?

3 A. That's a time stamp and date stamp, yes.

4 Q. Donor name?

5 A. Donor names with their emails, the amount that was  
6 donated, post COVID address of the donor and IP address and  
7 the status of the donation.

8 Q. Status is either success, meaning it went through, or  
9 failed, meaning the donation didn't go through?

10 A. Correct, whether the payment was completed or not.

11 Q. Okay. Let's look at some of the people who are making  
12 donations or attempting to make donations.

13 Okay. We go to the first successful donation to  
14 the Feeding Our Future II GoFundMe campaign is who?

15 A. The first successful donation is made by Aimee Bock in  
16 October 2021.

17 Q. Okay. And from there, let's just keep going up and look  
18 at some of the next donations. So let me pull up this chunk  
19 of people.

20 And we see several failed donations by who?

21 A. Several failed donations under the name of Suleman  
22 Mohamed.

23 Q. In the name of how much?

24 A. Each attempt seems to have -- well, it varies between  
25 5,000 and \$9,000.

1 Q. And was it Mr. Suleman Mohamed who signed that Star  
2 Distribution check for \$65,000 that we just saw when we were  
3 talking about donations?

4 A. Yes, he was.

5 Q. And then just six minutes after the last failed  
6 donation, who do we see making a \$5,000 donation?

7 A. We see Ikram Mohamed completing a donation of \$5,000.

8 Q. Okay. We see Ahmed Hashim with an email address of TFS  
9 Auditors making a \$3,000 donation. Do you see that?

10 A. I do.

11 Q. Who is Ahmed Hashim?

12 A. Ahmed Hashim is the owner of Olive Management.

13 Q. Okay. And two minutes later what do we see?

14 A. Two minutes later Salim Said makes a donation, looks  
15 like it went through. It was successful, a donation of  
16 \$6,000.

17 Q. Okay. And moving up in time about an hour and change  
18 later, what do we see?

19 A. We see Abdulkadir Salah making another donation of  
20 \$3,000. It looks like it went through.

21 Q. Okay. The next cluster of attempted donations and a  
22 successful donation are by who?

23 A. By Ahmed Ghedi.

24 Q. Who is Mr. Ghedi?

25 A. Mr. Ghedi is the owner and person who controlled the

1 accounts of AG Limited.

2 Q. And how much is Mr. Ghedi providing to this GoFundMe  
3 campaign?

4 A. The donation that we want through is for \$3,000.

5 Q. All right. Up here we see two failed but attempted  
6 donations. Who are these by?

7 A. These are by Abdikadir Mohamud.

8 Q. Who is Mr. Mohamud?

9 A. Mr. Abdikadir Mohamud is the one who owns and controls  
10 accounts for Tunyar Trading.

11 Q. All right. Jumping ahead about a month, this time to  
12 December, we see another individual with a couple attempted  
13 donations.

14 Who is Mr. Abdinasir Abshir?

15 A. Mr. Abdinasir Abshir is one of the incorporators for  
16 Horseed Management.

17 Q. Attempting to donate \$5,000 and then \$4,300?

18 A. And then \$4,300, yes.

19 Q. Sharmake Jama?

20 A. Sharmake Jama is the owner of Brava Restaurant in  
21 Rochester.

22 Q. And he made a successful donation?

23 A. It looks like he made a successful donation of \$5,000,  
24 yes, on December 3rd.

25 Q. Okay. Let's pull up a few more. What are we seeing in

1 these? Let's start at the bottom, Ahmed Hashi.

2 A. Ahmed Hashi with the associated email address of TFS  
3 Auditors is owner of Olive Management. Mancko Mohamud with  
4 the address a.mohamud15@gmail.com is Abdikadir Mohamud and  
5 owner of Tunyar Trading.

6 Q. And those donations are made seven minutes apart?

7 A. They are.

8 Q. Each for \$5,000?

9 A. Correct.

10 Q. Abdinasir Abshir, another attempted donation?

11 A. Correct. \$5,000 attempted donation.

12 Q. Abdulkadir Salah?

13 A. Abdulkadir Salah, makes a donation that goes through in  
14 the amount of \$5,000.

15 Q. We see Abdinasir Abshir?

16 A. Yes.

17 Q. Making a successful donation?

18 A. He does.

19 Q. And here at the top a \$10,000 donation by who?

20 A. A \$10,000 donation by Abdihakim Ahmed.

21 Q. What was significant to you in reviewing the names of  
22 the people who are making donations to this GoFundMe page?

23 A. It was apparent that the names of the people that were  
24 making these donations that went through and also those that  
25 failed were people connected to participants in the food

1 program under the sponsorship of Feeding Our Future.

2 Q. People who were purportedly serving hundreds of  
3 thousands of meals already at this point?

4 A. People who were purportedly serving, yes.

5 Q. And why was their -- why was their involvement in the  
6 Federal Child Nutrition Program significant to you when  
7 looking at these donations to Feeding Our Future II?

8 A. Well, the page that was created for this campaign  
9 contained information related to Feeding Our Future.

10 Q. And why did that make it significant that the people  
11 making donations operated sites under the sponsorship of  
12 Feeding Our Future?

13 A. Well, they were obtaining large payments as a result of  
14 them submitting claims through Feeding Our Future, which was  
15 the sponsor, the sponsoring organization.

16 Q. And again, can you remind the jury what the role of the  
17 sponsor is in the Federal Child Nutrition Program?

18 A. The sponsor is supposed to review claims for accuracy  
19 and completeness.

20 Q. I want to pivot again and talk about one final entity  
21 relating to Ms. Bock. Okay?

22 A. Okay.

23 Q. Are you familiar with an entity called School Age  
24 Consultants?

25 A. Yes, I am.

1 Q. I'm pulling up what is not yet in evidence as  
2 Government S60.

3 Your Honor, we'd offer S60.

4 THE COURT: Any objection?

5 MR. UDOIBOK: No objection.

6 MR. MONTEZ: No objection.

7 THE COURT: S60 is admitted.

8 BY MR. JACOBS:

9 Q. Ms. Blackwell, we're now looking at the Secretary of  
10 State Certificate of Organization for School Age  
11 Consultants. Can you explain to the jury what School Age  
12 Consultants is and walk them through this document?

13 A. Sure. School Age Consultants is a legal entity  
14 incorporated by Ms. Bock with the Minnesota Secretary of  
15 State at the end of 2021, specifically on 12/13.

16 Q. Okay. In that general time frame that we've been  
17 talking about for the past few minutes December of 2021?

18 A. Correct.

19 Q. I'm showing you another document not yet in evidence,  
20 S61.

21 Your Honor, we'd offer S61.

22 THE COURT: Any objection?

23 MR. UDOIBOK: No objection.

24 MR. MONTEZ: No objection.

25 THE COURT: S61 is admitted.

1 BY MR. JACOBS:

2 Q. Ms. Blackwell, can you tell the jury what S61 is?

3 A. S61 is the first page of business records, of bank  
4 records for an account opened by School Age Consultants with  
5 Bank of America.

6 Q. Okay. And the account owner is who?

7 A. The account owner is Aimee Marie Bock.

8 Q. All right. And if we go down here, what is the date  
9 that this account was opened on?

10 A. The date is also 12/13/2021, the same date the business  
11 was incorporated.

12 Q. Okay. Business is incorporated on the same date it  
13 opens a bank account.

14 A. Correct.

15 Q. And we are still in that December 2021 time period?

16 A. Correct.

17 Q. When we were talking about donations, we mentioned a  
18 meeting in December of 2021 at Feeding Our Future. Do you  
19 recall our conversation about that?

20 A. I do.

21 Q. And what's your general understanding of what happened  
22 at that meeting?

23 A. My understanding is that the meeting was attended by  
24 people who represented entities that were participating in  
25 the food program.

1 Q. I'm showing you what's already admitted into evidence as  
2 Government's BB41b. So, Ms. Blackwell, can you tell the  
3 jury, generally orient us as to what we're looking at in  
4 Government Exhibit BB41b?

5 A. We're looking at an example of conversations between  
6 Aimee Bock and her boyfriend.

7 Q. Malcolm Watson?

8 A. Malcolm Watson.

9 Q. And these are, the particular platform for these  
10 messages is what?

11 A. The platform through which these conversations were  
12 conducted is Facebook Messenger.

13 Q. And is that consistent with your review of how Ms. Bock  
14 and Mr. Watson communicated, at least some of the time?

15 A. Yes.

16 Q. Okay. And again, Mr. Watson is who?

17 A. Mr. Watson or Empress Malcolm Watson was Ms. Bock's  
18 boyfriend at the time, and they lived together.

19 Q. Okay. And the date of this particular message is when?

20 A. December 20, 2021.

21 Q. Right around the time of this purported meeting?

22 A. Right around the time, yes.

23 Q. Can you tell the jury what Ms. Bock writes to Mr. Watson  
24 on December 20th of 2021?

25 A. At 9:48 p.m. Ms. Bock writes, "The amount of money I'm

1 going to make tomorrow you should be fucking happy."

2 Q. Now let's fast forward to tomorrow in this message. Did  
3 Ms. Bock make any money?

4 A. Yes, she did.

5 Q. I'm pulling up Government's W45, which is -- let me go  
6 to the first page of W45. Is that same Bank of America  
7 account?

8 A. Yes, it is.

9 Q. For School Age Consultants?

10 A. Yes, it is.

11 Q. And if we go to page 42, we see checks coming in to this  
12 account?

13 A. Yes, we do.

14 Q. What's the date of this first check?

15 A. This first check is dated 12/21/2021.

16 Q. The day after Ms. Bock sends that text message about the  
17 amount of money she's going to make the next day?

18 A. Correct.

19 Q. And let's talk a little bit about this particular check.  
20 It's from Broadway Halal Market LLC?

21 A. It's from Broadway Halal Market LLC to School Age  
22 Consultant in the amount of \$2,800, and the stated purpose  
23 for the payment is Donation to Pioneer Partner/Policy PRO,  
24 presumably for procedure.

25 Q. What is Pioneer Partner?

1 A. Pioneer Partner is a participant in the food program.  
2 It's a site.

3 Q. Okay. Donation to Pioneer Partner.

4 Prior to 12/21, to December 21st of 2021, did you  
5 see any checks coming into the School Age Consultant  
6 account?

7 A. No.

8 Q. Did you see any activity in the School Age Consultant  
9 account?

10 A. No.

11 Q. In fact, it was just created approximately how long  
12 before this check from 12/21?

13 A. About a week.

14 Q. So if we start to page through these checks, again 12/22  
15 we see a \$2,800 check. Another \$2,800 check?

16 A. Correct.

17 Q. Central Deli and Coffee, another \$2,800 check?

18 A. Correct.

19 Q. We've heard about, you've testified a bit earlier about  
20 Central Deli and Coffee.

21 A. I did.

22 Q. And what was the context of that?

23 A. Excuse me. Central Deli and Coffee, as I said, was  
24 related to Feed Bank, which is a participant in the food  
25 program, the site.

1 Q. And did we see another check from Central Deli and  
2 Coffee for a donation to Feeding Our Future?

3 A. Yes, we did.

4 Q. And then another one here made out to School Age  
5 Consultants?

6 A. Yes. Actually I think there were two checks, \$7500.

7 Q. All right. We're on page 53, and we see a check from  
8 Inspiring Youth Outreach. Reached the jury where we've seen  
9 Inspiring Youth Outreach during your testimony?

10 A. Inspiring Youth Outreach, we saw this entity among the  
11 ones that were making payments to IM Consultation, I  
12 believe.

13 Q. Okay. Inspiring Youth Outreach is?

14 A. Is an entity that is controlled by Ms. Mohamed's  
15 husband.

16 Q. Participate in the food program?

17 A. Yes, it is.

18 Q. Wrote a check for \$2,800?

19 A. Yes.

20 Q. On December 21st, 2021?

21 A. The date is 12/21/2021.

22 Q. The day after that text message we just saw?

23 A. Correct.

24 Q. And if we keep flipping through here, we see another one  
25 that I think the jury's familiar with on 56. This is from

1 Sambusa King?

2 A. Yes, Sambusa King controlled by Mr. Awale. And the memo  
3 characterizes this Meet on Behalf of Shafii Tutoring or for  
4 Shafii Tutoring.

5 Q. And the jury will recall Mr. Awale's testimony, but here  
6 we've seen how many checks from Mr. Awale or Sambusa King?

7 A. Two.

8 Q. One for donation?

9 A. Correct.

10 Q. And one for what?

11 A. One for Shafii Tutoring.

12 Q. School Age Consultants?

13 A. School Age Consultant payment, yes.

14 Q. Flipping through here, we see check after check. Here's  
15 another one on page 64 from Abdullahe Jesow. Is he  
16 connected to an entity in the Federal Child Nutrition  
17 Program?

18 A. Yes. He worked for S & S Catering, which is a  
19 participant in the food program.

20 Q. And is S & S Catering one of the S's for Sahra Nur?

21 A. Yes.

22 Q. Youth for Higher Educational Achievement, is that  
23 another site in the Federal Child Nutrition Program?

24 A. Yes. It's a site that was run by Filsan Hassan, Qamar  
25 Hassan's daughter.

1 Q. Filsan Hassan is related to Qamar Hassan?

2 A. Yes. I believe she's her daughter.

3 Q. Academy for Youth Excellence, this is another S & S  
4 site?

5 A. This is another S & S site, and it's controlled by  
6 Ms. Sahra Nur.

7 Q. And the memo line here is what?

8 A. The memo line states Policy Procedure.

9 Q. Anything significant to you about Sahra Nur and S & S  
10 Catering paying for a policy procedure?

11 A. I'm not aware of them purchasing a policy or procedure  
12 document.

13 Q. And we see check after check. Here let's look at one  
14 more. Mekkira Hussein?

15 A. Mekkira Hussein, who is the principle of Shamsia Hopes.

16 Q. Shamsia Hopes who received almost \$10 million --

17 A. Correct.

18 Q. -- in claims submitted by Feeding Our Future?

19 A. Correct.

20 Q. And the date of this one again is what?

21 A. 12/21/2021.

22 Q. The day after Ms. Bock sends that text message about  
23 making money?

24 A. One day later.

25 Q. Okay. I'm pulling up another Facebook message exchange,

1 again between Ms. Bock and Malcolm Watson. Can you tell the  
2 jury the date of this exchange?

3 A. The date of this conversation is 12/29/2021.

4 Q. Okay. So a little over a week after the first message?

5 A. Correct, about eight days later.

6 Q. And a little bit shorter period after we start to see  
7 those checks come in?

8 A. Correct.

9 Q. Okay. So pulling up this first part, can you read this  
10 to the jury?

11 A. Sure. The conversation goes like, "You have said a  
12 million times you were selling the Nova, and it still sits  
13 in storage costing money every month."

14 Q. Do you know what a Nova is?

15 A. Yes. It's a Chevy car.

16 Q. All right. Continue. Sorry.

17 A. "Sits in storage costing money every month. Same with a  
18 Porsche. I bought a car that I don't even know where it is  
19 or have a key to."

20 Q. Okay. So Ms. Bock seems to be saying that she bought a  
21 Porsche and she doesn't know where it is or have a key to  
22 it?

23 MR. UDOIBOK: Objection. Leading.

24 THE COURT: Sustained.

25

1 BY MR. JACOBS:

2 Q. Which car is it your understanding that she is referring  
3 to when she says, "I bought a car that I don't even know  
4 where it is or have a key to it"?

5 MR. UDOIBOK: Objection. Leading.

6 THE COURT: Overruled.

7 THE WITNESS: Ms. Bock talks about the Porsche  
8 that she purchased from Malcolm Watson, Empress Malcolm  
9 Watson, around September 2021.

10 BY MR. JACOBS:

11 Q. Okay. So moving on in that same message she says, "I  
12 literally just deposited \$78,000 into the account for the  
13 book I sold. I made that in two weeks. I know how to make  
14 money. You say you do too, but you have never once shown  
15 it. Why? Is there a reason you won't do what needs to get  
16 done to get ahead?"

17 So let me take a step back here. The message  
18 says, "I literally just deposited \$78,000 into the account  
19 for the book I sold."

20 Do you have an understanding of what "the book I  
21 sold" is referring to?

22 A. The book that is being talked about in this  
23 conversation, I understand, means those policy and procedure  
24 documents that we saw, specified on the memo line of the  
25 checks we just looked at.

1 Q. Okay. I made that \$78,000 in two weeks. Is that  
2 consistent with what we just saw in the bank records?

3 A. That is consistent with the time frame of those records,  
4 yes.

5 Q. I'm pulling up Government Exhibit 045. Again, these are  
6 the Bank of America bank statements for School Age  
7 Consultants. What is the date of these deposits?

8 A. The date of these deposits is December 29, 2021.

9 Q. And how does that relate to the message that we just  
10 looked at?

11 A. It's the same day that the message was sent.

12 Q. And how much did Ms. Bock deposit to her School Age  
13 Consultants account on that date?

14 A. The combined amount for these deposits dated  
15 December 29th is approximately \$78,000.

16 Q. Okay. Now, were the checks that we saw deposited in her  
17 account the only checks for School Age Consultants?

18 A. No.

19 Q. I'm showing you Government Exhibit BB3, which were  
20 recovered during the search of Ms. Bock's house.

21 What do we see in BB3?

22 A. We see at least three checks that were written to School  
23 Age Consultants recovered during the search warrant.

24 Q. S & S Catering we've talked about quite a bit?

25 A. We did.

1 Q. Another \$2,800 check?

2 A. \$2,800 check signed by Qamar Hassan.

3 Q. This one from I-Care Home Health Care?

4 A. Correct. This one is written for \$5,600.

5 Q. Two times 2800?

6 A. That is twice the \$2,800 amount that we saw in previous  
7 checks, yes.

8 Q. Okay. All right. Another message between, another  
9 Facebook message between Ms. Bock and Mr. Watson. When was  
10 this message sent?

11 A. This one is also dated December 29, 2021.

12 Q. So same day as the last message?

13 A. Correct.

14 Q. Same day of that \$78,000 deposit?

15 A. Combined deposit, correct.

16 Q. All right. Ms. Bock says to Mr. Watson, "Stop blaming  
17 other people for your shitty life choices and behaviors.  
18 You claim to be the head, but then do all this shit because  
19 of everyone around you.

20 "You the head or a peasant follower? Shouldn't  
21 matter what I do or don't do. Be a man. You need to work  
22 out, then do it. Right now I need to make this money and  
23 win this lawsuit. So that's what I'm doing."

24 Do you see that?

25 A. I do.

1 Q. Same day that she deposited \$78,000 into her account?

2 A. Correct.

3 Q. So we talked about money coming into that School Age  
4 Consultants account. I want to talk about what that money  
5 was used for. Okay?

6 A. Okay.

7 Q. Did you see anything in the School Age Consultant  
8 accounts that suggested it was being used to create a policy  
9 or procedure?

10 A. No, I did not.

11 Q. Let's take a look at those actual account statements  
12 here. Can you remind the jury about when that account was  
13 opened?

14 A. It was opened December 13, 2021.

15 Q. And we're now in January of 2022. Do you see that?

16 A. Yes.

17 Q. Apart from \$2,800 checks, did you see any other deposits  
18 into the School Age Consultant account?

19 A. Just \$2,800 checks and fifty-six probably.

20 Q. Two times?

21 A. Two times, yes.

22 Q. So going to the first use of this account, let's take a  
23 look. This is January 11th. What was the School Age  
24 Consultants bank account used for the first time it was  
25 used?

1 A. It was to make a card purchase at Schneiderman's --  
2 sorry -- Schneiderman's Furniture in Meadowlands, Minnesota.

3 Q. A furniture store?

4 A. It is a furniture store.

5 Q. Okay. And about a week later we see another charge.  
6 This is the second charge from the School Age Consultant  
7 account.

8 What is this charge on January 18th for?

9 A. This is for -- this is almost over \$2,400 payment to The  
10 Peabody in Memphis, Tennessee.

11 Q. What is The Peabody in Memphis, Tennessee?

12 A. The Peabody is a luxury hotel in Memphis, Tennessee.

13 Q. And there is a charge for almost \$2,500 to that hotel?

14 A. \$2,487.21.

15 Q. Now, was this potentially a business trip for School Age  
16 Consultants?

17 A. It was not.

18 Q. I'm pulling up what's already in evidence as Government  
19 Exhibit B3. What do we see in Government B3, which was  
20 seized from Ms. Bock's house?

21 A. We see two VIP admission tickets to Graceland, which is  
22 the home of Elvis Presley, currently a museum.

23 Q. Okay. \$2,500 to a luxury hotel in Memphis?

24 A. And two admission tickets.

25 Q. Okay. Showing you what's already admitted into evidence

1 as Government Exhibit B52, these were photos from the search  
2 of Ms. Bock's phone?

3 A. Yes, they were.

4 Q. What do we see?

5 A. We see a photo of Ms. Bock and Empress Watson together  
6 at Graceland.

7 Q. Pulling up what has already been admitted into evidence  
8 as Government Exhibit X23, we're right back to a sources and  
9 uses chart.

10 Do you recognize this one?

11 A. I do.

12 Q. And what is this particular one for?

13 A. This is a summary chart showing money in and money out  
14 for the School Age Consultants Bank of America account  
15 between December 13th, 2021, the day the account was opened,  
16 until the account was closed, which was May 10th, 2022.

17 Q. Okay. And like we always do, we start with the sources  
18 of funds. And if we look here, we see a total of 103,000  
19 deposited into the School Age Consultant accounts, and  
20 there's a long list of names and entities and numbers next  
21 to them of the total deposit.

22 What jumps out to you about the deposits?

23 A. Well, the deposits are fairly -- it's fair to  
24 characterize them as all being made for \$2,800 or for 2800  
25 times two.

1                   And looking at the food program participants  
2 listed here, they are, you know, all related to sites or  
3 vendors participating in the food program.

4           Q.   Participating in the food program under the  
5 sponsorship --

6           A.   Under the sponsorship of Feeding Our Future.

7           Q.   Have you looked through that account and seen what the  
8 spending was done on?

9           A.   Yes.

10          Q.   How would you characterize the spending made out of that  
11 School Age Consultants account?

12          A.   I would characterize it as made for personal purposes,  
13 for living expenses.

14          Q.   All right. We're looking at that December 29th message  
15 again. "I know how to make money."

16                   Did you see Ms. Bock "make money" through the  
17 GoFundMe?

18          A.   Yes, I did.

19          Q.   Did you see Ms. Bock "make money" for the donations to  
20 Feeding Our Future?

21          A.   Yes, I did.

22          Q.   Did you see Ms. Bock "make money" when she sold a  
23 purported daycare center for \$310,000 to Safari Restaurant?

24          A.   Yes.

25          Q.   Who did what with that site?

1 A. It was used as a food site.

2 Q. Did you see Ms. Bock "make money" and "do what needs to  
3 be done to get ahead" when she deposited over \$100,000 into  
4 the School Age Consultants account?

5 A. Yes, I did.

6 Q. Deposits made all by entities participating in that  
7 program under the sponsorship of Feeding Our Future?

8 A. In one way or another, they were related to food program  
9 participants, yes.

10 MR. JACOBS: Your Honor, no further questions.

11 THE COURT: Thank you.

12 At this time we'll break for lunch. We'll return  
13 at 1:15.

14 All rise for the jury.

15 12:11 p.m.

16 **IN OPEN COURT**

17 **(JURY NOT PRESENT)**

18 THE COURT: Court is in recess until 1:15.

19 (Recess taken at 12:12 p.m. till 1:19 p.m.)

20 1:19 p.m.

21 **IN OPEN COURT**

22 **(JURY PRESENT)**

23 THE COURT: Thank you. You may all be seated.

24 And, Mr. Udoibok, you may begin your  
25 cross-examination.

1 MR. UDOIBOK: Thank you, Your Honor.

2 CROSS-EXAMINATION

3 BY MR. UDOIBOK:

4 Q. Ms. Blackwell, my name is Kenneth Udoibok, and I  
5 represent Aimee Bock, who is in court here.

6 A. Good afternoon, Counsel.

7 Q. Ive a few questions for you, and I want to start off  
8 with what you have already testified to. We'll take it in  
9 blocks. We'll discuss School Age Consultant.

10 A. Sure.

11 Q. And, Ms. Mallet, would you call up S60.

12 I believe you testified earlier that this was the  
13 Certificate of Organization for School Age Consultants,  
14 correct?

15 A. Correct.

16 Q. And based on your investigation, how many people owned  
17 School Age Consultants?

18 A. The incorporator was listed as Aimee Bock.

19 Q. All right. Let's go to S61. I believe you testified to  
20 the fact that this was a Bank of America account?

21 A. It is a Bank of America account, yes.

22 Q. And the account owner is --

23 Would you call out the first third.

24 A. The account owner is listed, Aimee Marie Bock.

25 Q. And let's go to BB41b. You also testified to the fact

1 that this was a Facebook post of Ms. Bock about the amount  
2 of money she was expecting to make the following day.

3 Is that it?

4 A. It appears to be a Facebook Messenger.

5 Q. And what date was that?

6 A. The date is December 20, 2021.

7 Q. 2020 or 2021?

8 A. December 20, 2021.

9 Q. All right. And then let's go to W45, page 42, I  
10 believe.

11 This is a sample check, one of the checks that  
12 were given to Ms. Bock, correct?

13 A. Correct.

14 Q. And because she is the operator of School Age  
15 Consultants, correct?

16 A. Correct.

17 Q. All right. Ms. Mallet, go to page 54. Reduce it,  
18 please. Call out the for section, the memo section.

19 I believe your testimony was that it was policy  
20 and procedure, correct?

21 A. Yes.

22 Q. I'm not going to belabor you with all the pages.

23 Go to page 59. Reduce it, please.

24 And this is a deposit to the account, correct?

25 A. Yes, it appears to be the date stamp on the back of the

1 check showing the date it was deposited into the account.

2 Q. All right. Let's go to BB41c.

3 And this is also, you testified to the fact that  
4 this is a conversation posed between Ms. Bock with her, her  
5 friend or boyfriend?

6 A. Correct.

7 Q. Watson?

8 A. Correct.

9 Q. All right. And I direct you to highlight the section in  
10 the middle starting with, "I literally just deposited."

11 Would you read that, please?

12 A. Sure. "I literally just deposited \$78,000 into the  
13 account for the book I sold. I made that in two weeks. I  
14 know how to make money. You say you do too, but have never  
15 once shown it."

16 Q. So based on Exhibit 41c and your investigation, that  
17 book is referring to the procedure manual that you testified  
18 to earlier?

19 A. It is my understanding that this is the reference, yes.

20 Q. Based on your investigation, do you know how long it  
21 took Ms. Bock to put together the policy manual?

22 A. I do not.

23 Q. I want to shift gear a little bit to the GoFundMe.

24 Ms. Mallet, would you call up S30. Why don't you  
25 go to the second page.

1           So I believe you testified that this was a Feeding  
2 Our Future GoFundMe page?

3           A. This is a page that bears the logo of Feeding Our  
4 Future, and, and the explanation under the logo says, "This  
5 fundraiser is organized by Feeding Our Future II."

6           Q. Okay. And solicited donations, correct?

7           A. It's a fundraising campaign, yes.

8           Q. Yes. And is a fundraising campaign restricted to any  
9 geographical area?

10          A. I don't believe so.

11          Q. Okay. And why don't you go to, Ms. Mallet, go to  
12 page 9.

13                    Just, for example, I'm not going to belabor you  
14 with all of it.

15                    Could you call up the first third.

16                    Based on your investigation, do you understand why  
17 a donation would fail?

18           A. Sure. There are various reasons why a donation could  
19 fail, yes.

20           Q. Give me, give me one or a couple, if you know.

21           A. One that comes to mind would be that there are not  
22 enough funds in the account. Another explanation would be  
23 that maybe they -- the connection to the internet is  
24 interrupted. Maybe the bank for some reason doesn't  
25 successfully complete the transaction and has a reason to

1 reverse it. Various reasons to stop it, various reasons.

2 Q. Based on your investigation of GoFundMe page, this  
3 GoFundMe page, and your investigation generally, do you know  
4 whether Ms. Bock can control whether or not a deposit goes  
5 into the page or not?

6 A. I'm sorry. Could you repeat?

7 Q. Sure. Well, let me put it a simpler way. Is it  
8 possible for Ms. Bock to cause the deposit to fail?

9 A. I don't believe so.

10 Q. Okay. Now, let's go to BB41b, like in boy. And go  
11 to -- no. That's not the one I wanted. Go to W45.

12 So I've just shown you two -- BB41 and W45 and the  
13 checks, the moneys that were deposit as part of the  
14 fundraising.

15 All right? And went into School Age Consultants,  
16 correct?

17 A. It was deposited into School Age, correct.

18 Q. And the GoFundMe page did not restrict it to any  
19 particular geographical area, correct?

20 A. There is no reason for me to think it was restricted.

21 Q. I want to shift gear a little bit more, and I want to --  
22 during your direct examination, counsel refers to a meeting  
23 at Feeding Our Future.

24 Do you recall that line of questioning?

25 A. I do.

1 Q. Do you know when that meeting occurred?

2 A. I do.

3 Q. When did it occur?

4 A. December 20.

5 Q. December 20, 2021?

6 A. I believe so.

7 Q. All right. And do you know what the purpose of the  
8 meeting was?

9 A. The purpose for the meeting was to have a conversation  
10 between -- a conversation with food program participants.

11 Q. Was it just food program participants, or did other  
12 nonfood program participants attend the, attended the  
13 meeting?

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

15 THE COURT: Overruled.

16 You may answer if you can.

17 THE WITNESS: It is my understanding that the  
18 meeting was attended by food program participants.

19 BY MR. UDOIBOK:

20 Q. Exclusively?

21 A. I am not aware of other people in attendance.

22 Q. All right. So let's go to S32. This is a donation --  
23 this is a check, rather, from Sambusa King to Feeding Our  
24 Future.

25 Do you see that?

1 A. I do.

2 Q. Is that check written to Ms. Bock?

3 A. It is written to Feeding Our Future.

4 Q. So let's go to W2a. You testified that this was an  
5 account for which organization?

6 A. This, this is the bank statement for Feeding Our Future.

7 Q. All right. Call out the address.

8 A. Sure. Feeding Our Future doing business as Teaching Our  
9 Future at 3055 Old Highway 8, Suite 312, Minneapolis,  
10 Minnesota.

11 Q. Whose address is that?

12 A. It is the organization, the business office.

13 Q. Okay. All right.

14 A. Feeding Our Future office.

15 Q. Now let's just continue. Let's go to W2b.

16 That check went to Feeding Our Future, correct,  
17 and not to Ms. Bock?

18 A. The check is written to Feeding Our Future, correct.

19 Q. All right. Now, you testified about -- maybe you should  
20 hold on W2b. Let's just take, for example, page 5 of W2b,  
21 see what happened.

22 You testified about many checks that were written,  
23 correct?

24 A. Correct.

25 Q. And we'll just take this one for 7500. Who's, who's the

1 beneficiary of that check?

2 A. The beneficiary is -- well, the payee is Feeding Our  
3 Future.

4 Q. All right. It's paid to the order of Feeding Our  
5 Future, correct?

6 A. Sure.

7 Q. All right. And in the memo section, Ms. Mallet, would  
8 you call out the memo section, along with the signature.

9 That check is written to Ms. Bock for donation,  
10 correct?

11 A. The check is written for donation, correct.

12 Q. For donation. And, and did your investigation reveal  
13 what the purpose of that donation was?

14 A. It was a payment made for, for Ms. Bock.

15 Q. To Feeding Our Future?

16 A. The check was written to Feeding Our Future, yes.

17 Q. All right. My question, though, is, Do you know what  
18 the donation was for?

19 A. I am aware that during the meeting that you mentioned  
20 previously, there was a reason given for the money being  
21 raised at that meeting.

22 Q. Well, you don't recall what the purpose of that donation  
23 was. Is that your testimony?

24 A. I don't know specifically the reason for this particular  
25 donation, no.

1 Q. Let's talk about Southcross. You testified at length  
2 about Southcross. Remember?

3 A. Southcross site, yes.

4 Q. Right. Ms. Mallet, would you call up P44.

5 So this is an email from Ms. Bock to which  
6 organization? At the top half, it's a forwarded email,  
7 right?

8 A. Yeah. It is a forwarded email, and it seems to stay  
9 within the same organization.

10 Q. All right. It's sent to which section of Feeding Our  
11 Future?

12 A. So the email is sent from Aimee Bock to CACFP claims.

13 Q. Claims. All right. And please the call out.

14 And initially the email is from, I believe you  
15 testified to this, from Eidleh, right?

16 A. Correct.

17 Q. To Ms. Bock?

18 A. Correct.

19 Q. All right. Go to P17. No, not P17, page 17.

20 That's a meal count, correct?

21 A. It is.

22 Q. Please call out the first three lines.

23 And this supervisor of this site is who?

24 A. The supervisor is listed as Suad Muse.

25 Q. Now let's go -- what date, what date was that?

1 A. The date for this document?

2 Q. Yes.

3 A. Is listed for the week of August 29, 2021.

4 Q. When was the meeting, when was the meeting that you  
5 testified about at Feeding Our Future? I believe you said  
6 it was December --

7 A. December 20 --

8 Q. December 20th?

9 A. -- 2021, yes.

10 Q. So this meal count predated that meeting, correct?

11 A. I would say yes.

12 Q. All right. Let's go to W59.

13 This is a bank account that you testified to  
14 earlier, correct?

15 A. Hope Suppliers LLC, correct.

16 Q. But Ms. Bock is not the organizer of Hope Suppliers, is  
17 she?

18 A. No, I don't believe she is.

19 Q. And it doesn't look like she has access to this account,  
20 does she?

21 A. Based on this document, no.

22 Q. Let's go to page 37 of 59. And this is a check from  
23 Feeding Our Future to Hope Suppliers, correct?

24 A. Correct.

25 Q. And it's based on the meal count that we reviewed

1 earlier, correct?

2 A. Correct.

3 Q. And would you call out the memo section with the date.

4 Do you see that?

5 A. I do.

6 Q. How much money was paid by Feeding Our Future to Hope  
7 Suppliers?

8 A. The amount for this, of this check is \$343,064.12.

9 Q. Representing the amount for the meal count, correct?

10 A. Representing, I believe, a combined total.

11 Q. For the meal counts?

12 A. For meal counts.

13 Q. Okay.

14 A. Or claiming reimbursed claims, yes.

15 Q. So let's go to P4, Government Exhibit P4, I believe, if  
16 my notes are correct.

17 So now we're into about October 2021, correct?  
18 September 2021?

19 A. Yes, the end of September 2021.

20 Q. This is an email from Ms. Bock to Ikram Mohamed,  
21 correct?

22 A. Yes.

23 Q. It's regarding, it's regarding the Feeding Our Future  
24 Arcade, SIR Boxing site?

25 A. The subject is a forwarded email referencing FOF Arcade,

1 SIR Boxing, yes.

2 Q. All right. So --

3 (Counsel confer)

4 MR. UDOIBOK: Your Honor, just a minute. I need  
5 to check my notes.

6 Your Honor, I would like to withdraw that line.  
7 P4 is not in evidence.

8 THE COURT: What are you withdrawing?

9 MR. UDOIBOK: I meant, I meant to call P44, and I  
10 said P4.

11 THE COURT: All right.

12 MR. UDOIBOK: Yeah.

13 BY MR. UDOIBOK:

14 Q. So let's move to GG4.

15 So you testified to this earlier. Southcross  
16 after school meal count, correct?

17 A. Correct.

18 Q. And again, who is the supervisor?

19 A. The supervisor for this site?

20 Q. Yes.

21 A. For this listed on this meal count form is Kiin Anod.

22 Q. All right. And then this particular meal count, you  
23 testified to that it was blank, correct?

24 A. Correct.

25 Q. It is blank?

1 A. Yes, it has fields that are not filled out.

2 Q. All right. Based on your investigation, do you, do you  
3 know whether this exhibit, this blank form, was submitted in  
4 any way?

5 A. It is a blank form, so it was not submitted.

6 Q. Okay. Let's go to P41.

7 This is an October Southcross file?

8 A. Correct.

9 Q. Let's go to the second page. This is another meal  
10 count, right?

11 A. Yes.

12 Q. Signed by the same supervisor?

13 A. Yes, it appears it's signed by the same supervisor.

14 Q. And it's sometime in October 2021, correct?

15 A. The face of it says that the week is the week of  
16 October 1st, '21.

17 Q. All right. So in October 1st, 2021, was there child  
18 care at Southcross?

19 A. I don't believe so.

20 Q. Does this meal count purports to be a child care?

21 A. No, it does not.

22 Q. Why don't you go to P43.

23 We're in December now, right?

24 A. Correct.

25 Q. All right. Same. Southcross?

1 A. Yes.

2 Q. All right. Let's go to the second page.

3 Now who is the supervisor in this, this time?

4 A. The supervisor's first name is a little difficult to  
5 make.

6 Q. All right.

7 A. But I believe the last name is Sheikhdan.

8 Q. And it is not Ms. Bock, is it?

9 A. It doesn't appear it's Ms. Bock, no.

10 Q. Let's go to, I think it's M1, if I can read my  
11 handwriting. M like in -- no. M, like in Mary, 1. There  
12 you go.

13 So you testified to M1, Exhibit M1, Bet on Better  
14 Future, correct?

15 A. Yes.

16 Q. And go to the next page.

17 Do you recall who the organizer of Bet on Better  
18 Future was?

19 A. I believe it was a series of three organizers.

20 Q. Yes. Would you move to the third page, please.  
21 Continue.

22 Is Ms. Bock part of the organizers?

23 A. No, she is not listed here.

24 Q. All right. Let's go to W2 and specifically go to  
25 page 305.

1 Now, this is a check for \$189,161.38, correct?

2 A. Correct.

3 Q. Now that's a Feeding Our Future check to Southcross,  
4 correct?

5 A. This is a Feeding Our Future check to Bet on Better  
6 Future --

7 Q. I mean --

8 A. -- for the Southcross site.

9 Q. For the Southcross site?

10 A. Correct.

11 Q. And the check is not drawn on behalf of Ms. Bock, is it?

12 A. Ms. Bock signs this check, but it's drawn on the account  
13 of Feeding Our Future.

14 Q. No, ma'am. Feeding Our Future is writing a check to Bet  
15 on Better Future, correct?

16 A. Yes.

17 Q. Okay. She's not the beneficiary of that amount of  
18 money, is she?

19 A. No. The check is written to Bet on Better Future.

20 Q. Okay. Let's talk about S29, S like in Sam.

21 I believe you testified to this.

22 Ms. Mallet, could you enlarge it a little bit? Is  
23 it possible?

24 Okay. Sorry.

25 Now, the bottom check, the bottom check was to

1 Ms. Bock personally, correct?

2 A. Correct.

3 Q. And it is payment for the sale of the child care,  
4 correct?

5 A. It has the same amount as -- yes, it is the payment for  
6 the sale agreement that we saw earlier.

7 Q. All right. Let's look at Z40. I just want to confirm.

8 And you testified to that this was the check that  
9 was deposited into Ms. Bock's personal account, correct?

10 A. Correct.

11 Q. So I want to go back. Now that you've seen the deposit  
12 of this check, there are a couple of questions or a few  
13 questions that I would like to, I would like some clarity.

14 So, Ms. Mallet, would you call up H26.

15 I believe you testified to this email, correct?

16 A. I mean, I don't recall this specifically, but it's  
17 possible.

18 Q. Okay. Well --

19 MR. JACOBS: Your Honor, I'm going to object. I  
20 don't think she did testify to this email.

21 THE COURT: Sustained.

22 MR. UDOIBOK: All right.

23 BY MR. UDOIBOK:

24 Q. So let me, let me -- before that, let's go to I believe  
25 SS11.

1                   Just give me a moment.

2                   (Mr. Udoibok confers with Ms. Mallet)

3 BY MR. UDOIBOK:

4 Q. Okay. So SS11 {sic} is the same check that we talked  
5 about, the cashier's check, a copy of a cashier's check  
6 correct?

7 A. It is.

8 Q. So, Ms. Mallet, call up HH26.

9                   This is the purchase agreement, right, of a child  
10 care center you testified to earlier?

11 A. It is.

12 Q. So call out the date of the purchase agreement.

13                   All right. You agree with me, as you testified  
14 earlier, that the purchase was consummated in August 2021,  
15 correct?

16 A. Correct.

17 Q. Now, did you -- you testified that there was no child  
18 care center at that location. Is that your testimony?

19 A. There was a different child care center at the location,  
20 but Ms. Bock did not own it.

21 Q. Okay. Now, did you inspect the old child care center in  
22 any way?

23 A. I'm sorry. Did I --

24 Q. Did you inspect the old child care center in any way?

25 A. The old one?

1 Q. Yes.

2 A. Did I personally go there to inspect it? No, I did not.

3 Q. Now, the new child care center after the purchase, did  
4 you inspect it in any way?

5 A. I saw photographs taken from that location, yes, on the  
6 day of the search warrant.

7 Q. When was that?

8 A. When was what?

9 Q. When was the photograph taken, if you know?

10 A. On the day of the search warrant.

11 Q. That would have been December or January 2022?

12 A. 2022, correct.

13 Q. 2022. So you don't know personally what occurred  
14 between August 2021 and January 2022 at the child care  
15 location, do you?

16 A. You mean at 1506 Southcross?

17 Q. Correct.

18 A. Yes, I do.

19 Q. All right. Between August 2021 and the search warrant,  
20 you do?

21 A. I do. Based on the review of the financials, I have an  
22 idea.

23 Q. Okay. You have an idea. You have information yourself  
24 as to whether there were any equipments in the building  
25 between the purchase and the search warrant?

1 A. Based on the photographs that I reviewed that were taken  
2 at the search warrant day --

3 Q. Yes.

4 A. -- I have an idea, yes.

5 Q. Oh, yeah. But you have, you base your idea on  
6 photograph taken in January of 2022?

7 A. That and the review of the financial records that we  
8 obtained during the investigation, yes.

9 Q. The financial records would show financial transaction,  
10 correct?

11 A. The financial records would keep a record of, of  
12 payments, yes.

13 Q. But financial records will not show inventory, would it?

14 A. I don't believe so.

15 Q. So let's just scroll down a bit. So go back up. Sorry.

16 Under background, I believe you testified to  
17 background (a) and (b). So highlight that.

18 By the way, do you know whether the parties used  
19 an attorney in preparing this agreement?

20 A. I'm sorry. Could you repeat? Do I know if --

21 Q. Whether they used an attorney in preparing the  
22 agreement?

23 A. I believe they used an attorney, yes.

24 Q. All right. Release the callout. Go to the bottom. The  
25 last page, please. Call out.

1           There's no signature of an attorney, is there one?

2           A.   There is no signature affixed by an attorney, no.

3           Q.   Okay. All right. Let's go back to the first page.

4           So call out the background.

5           MS. MALLET: I'm sorry. What?

6           MR. UDOIBOK: The background (a) and (b).

7           BY MR. UDOIBOK:

8           Q.   (A) says that the seller carries on the business of  
9           child care at 1506 Southcross, Southcross Drive in  
10          Burnsville.

11          Do you see that?

12          A.   I do.

13          Q.   Based on your investigation, do you know whether or not  
14          Ms. Bock had an existing child care license?

15          A.   She did not.

16          Q.   She did not.

17          Now, go to the next -- let's just go through the  
18          next paragraph.

19          So, and there was some considerations, all right,  
20          for the sale of this child care, correct?

21          A.   If you mean the definitions that follow?

22          Q.   No. It said, "In consideration of the provisions  
23          contained in this agreement and for other good and valuable  
24          considerations," do you know what those valuable  
25          considerations were?

1 A. I believe they're referring to the price paid.

2 Q. Just go to the next page. Call out (a), the assets.

3 All right.

4 Do you see in the first, the numeral (i), all  
5 equipment used in carrying on the seller?

6 A. I do.

7 Q. Based on your investigation, does that refer to the  
8 equipments that existed at the sale of the business?

9 A. All equipment used in carrying on the seller.

10 Q. Yes. Does that mean to you that it was the equipment  
11 that existed at the sale, of the sale of the business?

12 A. It says, "All equipment used in carrying on" what was  
13 purported to be a daycare center.

14 Q. All right. And then there's also, "The goodwill of the  
15 seller, including the business name."

16 Do you see that?

17 A. I do.

18 Q. Based on your investigation, what did you discover to be  
19 the goodwill?

20 A. Ms. Bock did not have an existing child care center  
21 there. It was, she never had a license. There were no  
22 customers. There was no employees. There were no  
23 employees.

24 Q. I believe you testified earlier that Ms. Bock as of  
25 August 2021, she did not have a child care license.

1 A. She did not.

2 Q. All right. And would it be fair to say that your  
3 testimony is Ms. Bock did not have the reputation for one in  
4 a child care business?

5 A. Given the fact that she didn't have a licensed child  
6 care center.

7 Q. My question, though, was, Did Ms. Bock have a license to  
8 conduct child care?

9 A. How would you have a reputation if you don't have a  
10 licensed child care center?

11 Q. No. Two separate things we're talking about here.  
12 Child care center and a license are two separate things.

13 Do you agree with me?

14 THE COURT: I'd like a sidebar, please.

15 **(Sidebar discussion)**

16 THE COURT: Mr. Udoibok, I don't, I don't  
17 understand this. You had just said would it be fair that  
18 Ms. Bock doesn't have a reputation, and then she answered  
19 you. And you said my question was whether she had a  
20 license. That wasn't your question.

21 Turn your microphone on.

22 MR. UDOIBOK: Sorry.

23 I thought I meant, I meant is it fair to say that  
24 Ms. Bock had a reputation.

25 THE COURT: You did, but --

1 MR. UDOIBOK: Okay.

2 THE COURT: What you are doing is then, when you  
3 get an answer, you are saying my question though is, and you  
4 are not asking the same question. You are asking a  
5 different one.

6 And it's confusing to the witness and I think to  
7 the jury.

8 MR. UDOIBOK: All right.

9 THE COURT: Okay.

10 MR. UDOIBOK: All right. Thanks.

11 THE COURT: Thank you.

12 **(In open court)**

13 BY MR. UDOIBOK:

14 Q. So, Ms. Blackwell, let me try to clear up a little bit.

15 A. Of course.

16 Q. I believe you testified that in August 2021 Ms. Bock did  
17 not have a license.

18 MR. JACOBS: Your Honor, I'm going to object at  
19 this point. People don't have daycare center licenses.  
20 Daycare centers have licenses.

21 THE COURT: I think it's a fair characterization  
22 of Ms. Blackwell's testimony, and so I'll leave it for  
23 redirect and overrule.

24 BY MR. UDOIBOK:

25 Q. I'm sorry. Does she have a license or not in

1 August 2021?

2 A. In August of 2021, based on the documentation that we  
3 obtained from Minnesota Department of Health Services, no,  
4 she did not.

5 Q. Okay.

6 A. Not for that location, no.

7 Q. Now, the next question is, Do you believe Ms. Bock had a  
8 reputation for, in child care?

9 A. In child care at that location?

10 Q. Not at that location. Generally.

11 A. I mean, I know she worked in, in child care related  
12 fields.

13 Q. Okay.

14 A. I am generally aware of that, yes.

15 Q. Okay. That's what I was -- I was asking.

16 So is it possible that the goodwill included her  
17 reputation in child care generally?

18 A. Goodwill can refer to a number of things.

19 Q. Okay.

20 A. Like trained workforce, customer base, but mainly refers  
21 to the reputation, to the ability of a business to acquire  
22 and to retain customers. It's basically what, you know,  
23 customers look for when they go back to the old place where  
24 the business was located.

25 Q. When you conducted your investigation, do you know

1 personally whether Ms. Bock hired the buyers to train them  
2 in child care?

3 A. If she hired -- I'm sorry. Do I know --

4 Q. Whether she offered to train them in child care.

5 A. If she offered to train Cosmopolitan? It's not  
6 specified in the agreement, so I don't know.

7 Q. Okay. But you didn't uncover anything as part of your  
8 investigation regarding the offer to train?

9 A. No.

10 Q. Okay.

11 MR. JACOBS: Objection, Your Honor. She just  
12 testified there was no offer to train.

13 THE COURT: Overruled. The answer will stand.

14 BY MR. UDOIBOK:

15 Q. So I'm going to shift gear a little bit to S19 first  
16 regarding Learning Journey LLC.

17 So this is a folder that contained materials about  
18 Learning Journey LLC, correct?

19 A. Correct.

20 Q. All right. And let's go to the first page to see the  
21 time frame.

22 Now, what is this?

23 A. This is a communication from the Department of Treasury,  
24 the Internal Revenue Service, sent to The Learning Journey  
25 LLC and Aimee Bock as member.

1 Q. So will you call out the address.

2 What is that address?

3 A. The address listed is 1506 Southcross Drive West in  
4 Burnsville, Minnesota.

5 Q. All right. What time frame was this letter written?

6 A. The date of the IRS notice is October 9, 2019.

7 Q. All right. And then it's for the issuance of employer  
8 identification number, right?

9 A. Yes, it is. It says the IRS assigned EIN such and such  
10 for Learning Journey.

11 Q. And, Ms. Mallet, could you call out the first, "We  
12 assigned you an employer identification number." Correct?  
13 Please.

14 So that is the Number 84-3308208. That is the  
15 number issued to The Learning Journey LLC by the IRS,  
16 correct?

17 A. Correct.

18 Q. Based on your experience in financial matters, what are  
19 the steps one would take to get a tax ID number?

20 A. They will have to provide to the IRS the documentation  
21 required, which includes the incorporation records.

22 Q. Incorporation records.

23 Why don't you go to page 55.

24 What is this?

25 A. This is the Articles of Organization for The Learning

1 Journey LLC issued by the Office of the Minnesota Secretary  
2 of State.

3 Q. At what time frame was this?

4 Open it up a little bit.

5 A. If you can scroll down.

6 Q. Scroll down some more.

7 All right. Call out the date, please, that it was  
8 filed.

9 When was that?

10 A. This filing has the date of September 30, 2019.

11 Q. And this is -- how many months before the sale of the,  
12 of the learning center?

13 A. Almost two years.

14 Q. Almost two years?

15 A. Yeah.

16 Q. Okay. Ms. Mallet, would you call out S, S2.

17 What is this?

18 A. This represents a page from the lease agreement for the  
19 location at Southcross.

20 Q. Call out the lease date.

21 Who is the lessee or the lesser in Exhibit S2?

22 A. The lease dated October 3rd, 2019, is between the  
23 landlord Carpenter Land Company and tenant Aimee Bock and  
24 Shafi Qanyare.

25 Q. And the date, could you highlight the date, please.

1                   Is October 3rd, 2019, correct?

2           A.   It is.

3           Q.   Please call out S21.  No.  Take that out.

4                   Let me see.  I just want to make sure it is in  
5           evidence.

6                   THE COURT:  It is.

7                   MR. UDOIBOK:  Thank you, Your Honor.

8           BY MR. UDOIBOK:

9           Q.   Call out S21.  Please --

10                   This is regarding, this is also documents that you  
11           testified to regarding the child care center, correct?

12           A.   Correct.

13           Q.   I want to go to page 5.

14                   Call out the date.

15                   What date is that?

16           A.   This date is January 26, 2021.

17           Q.   All right.  Now let's go to the -- call out the first  
18           paragraph.

19                   What does it say?

20           A.   The paragraph says, "On May 13, 2020, the Department of  
21           Human Services, Division of Licensing, received your  
22           application for a license to provide child care under the  
23           program name of The Learning Journey, located at 1506  
24           Southcross Drive West, Burnsville, Minnesota."

25           Q.   Let's go to the next paragraph, please.

1                   This is a little lengthy.

2                   Could you read that?

3           A.   Sure.   "Based on an initial review of your application,  
4           you were sent a letter by secure email on July 31st, 2020,  
5           notifying you that your application was incomplete and  
6           noncompliant with licensing requirements.

7                   "DHS also attempted to contact you at the  
8           telephone number provided on your application in October and  
9           November 2020 regarding the status of your application and  
10          the items required to proceed.

11                   "DHS had contact with you on December 8, 2020.  On  
12          that date, you acknowledged your receipt of the messages  
13          from DHS, but chose not to respond.  Subsequently, on  
14          December 21, 2020, you were sent a letter by secure mail,  
15          notifying you that information was required to be submitted  
16          within 30 days or your application would be considered  
17          withdrawn.

18                   "To date, DHS has not received the information  
19          necessary to proceed with your application."

20          Q.   All right.  Go to the next page.  Next paragraph.

21                   Would you read it, please?

22          A.   Sure.   "This letter serves as notice that your  
23          application for licensure has been withdrawn.  If you decide  
24          to pursue a license after your application is withdrawn, you  
25          will need to restart the process by submitting a new license

1 application with a \$500 application fee payment."

2 Q. All right. So this letter is written on January 26th,  
3 correct?

4 A. Correct.

5 Q. Regarding providing child care services at The Learning  
6 Journey location at 1506 Southcross Drive West in  
7 Burnsville, correct?

8 A. This letter notifies Ms. Bock that her license is  
9 considered withdrawn.

10 Q. All right. I believe you testified at about this time  
11 there was child care facilities were not -- was difficult to  
12 operate because of COVID, correct?

13 A. COVID happened after -- on or around spring of 2020,  
14 yes.

15 Q. And based on your investigation and this letter, do you  
16 believe that the application for license was abandoned, for  
17 licensing was abandoned?

18 A. Based on the second paragraph, which describes multiple  
19 attempts to receive information that was missing from the  
20 initial application, I understand that there were several  
21 contacts made with Ms. Bock or at least attempts, and  
22 successful contact on December 8th.

23 And a decision was made to consider the  
24 application for licensure withdrawn.

25 Q. Yes. Is it fair to say that Ms. Bock did not take

1 active steps to continue in the licensing application?

2 A. That is my understanding from the content of this  
3 letter, yes.

4 Q. Now, let's go to V8.

5 I believe you testified to Exhibit V8 being  
6 Southcross, Feeding Our Future site, correct?

7 A. Correct.

8 Q. Could you call out the first quarter.

9 What time frame is this CLiCS information?

10 A. This record specifies that the approval effective date  
11 range is October 2020 through April 2021.

12 Q. All right. So as of that January, I believe  
13 January 2021, the child care license as far as DHS had been  
14 withdrawn, correct?

15 A. The license application was withdrawn.

16 Q. Yes, license application has been withdrawn?

17 A. Yes.

18 Q. Okay. So let's go to page 5 of V8.

19 Now this is an MDE document, correct, meaning  
20 Minnesota Department of Education?

21 A. It's an application supplement, yes.

22 Q. And who's the sponsor?

23 A. The sponsor name is listed Feeding Our Future.

24 Q. And who is the program support staff? I will direct you  
25 to Number 2.

1 A. The program support staff/site monitor is listed Hadith  
2 Ahmed.

3 Q. All right. Let's go to page 11. Would you call out the  
4 sponsor and the vendor.

5 Who is the vendor here?

6 A. The vendor here is listed Empire Cuisine & Market.

7 Q. All right. And let's go to the site name.

8 That's Southcross, isn't it?

9 A. It is Southcross.

10 Q. Let's go to P37.

11 This is July 2021, correct?

12 A. That's correct.

13 Q. And this is Southcross, Southcross's folder. I want to  
14 direct you to page 7 of P37.

15 What is this?

16 A. This is a meal count form filled out for the site at  
17 1506 Southcross, Burnsville, Minnesota.

18 Q. Who is the signatory?

19 A. The signature belongs to Abdiaziz Farah.

20 Q. Okay. It's not Ms. Bock, is it?

21 A. Abdiaziz Farah is not Ms. Bock.

22 Q. All right.

23 A. Abdiaziz Farah is the principal owner and -- of Empire  
24 Cuisine & Market.

25 Q. And he's not Hadith, is it?

1 A. No.

2 Q. Let's go to 38. Excuse me. P38. Thank you Ms. Mallet.

3 We're going to August now in Southcross. Fiscal  
4 year 2021; is that correct?

5 A. Correct.

6 Q. So direct you to page 6.

7 And this is an invoice you testified to from Hope  
8 Suppliers, correct?

9 A. Correct.

10 Q. And it's billed to which organization?

11 A. Billed to Southcross Burnsville.

12 Q. Go to page 14. And this is meal count, correct?

13 A. Yes, this is a meal count filled out for the week of  
14 8/1/21.

15 Q. All right. And I'm not going to belabor with the rest  
16 of it. Nonetheless, the amount of money paid will be  
17 consistent with the meal count, correct?

18 A. Correct.

19 Q. I'm going to shift gear a little bit just to get some  
20 clarity about Exhibit W50.

21 So I believe you testified to whose account was  
22 this?

23 A. This was a bank account application for Idleh Inc., an  
24 entity owned by Abdikerm Idleh.

25 Q. I'm sure you would agree with me that Ms. Bock is not a

1 signatory to this account?

2 A. No. The only person that is listed under Eidleh Inc. is  
3 Mr. Abdikerm Eidleh.

4 Q. All right. And based on your investigation, did it -- I  
5 withdraw that question. One moment.

6 Let's go to F7. This is an email from Ms. Bock to  
7 Minnesota Department of Education, correct?

8 A. Correct.

9 Q. And it's to, along with that, it's Kendra Pace, Emily  
10 Honer. Do you see that?

11 A. I do.

12 Q. And what is the attachment? There's an attachment for  
13 SFSP. Do you see that?

14 A. I do.

15 Q. You testified to this regarding clarification. Do you  
16 recall that?

17 A. I do.

18 Q. Okay. Let's go to the first -- second page. Call out  
19 the first clarification, that first box, please.

20 Could you read that?

21 A. "Clarification restaurants. I am sorry for any  
22 confusion. Based on the documents and letter request, I did  
23 not see a space to indicate that Feeding Our Future will be  
24 staffing the following locations. A catering contract is  
25 held with each food vendor, but their function is limited to

1 preparing the food. They do not participate in distributing  
2 the meals."

3 Q. All right. So let's go to Q85.

4 Now I just want to -- you testified to this  
5 exhibit earlier. What is this about?

6 A. Do you want me to read the most receipt or the --

7 Q. The earliest.

8 A. The earliest?

9 Q. Yes.

10 A. Okay. It's an email from Hadith Ahmed on February 27th,  
11 2021, to Aimee Bock.

12 "Hello, boss. We took a lot of organizations that  
13 don't work with children or are advocates. I am just  
14 realizing that now. For example, Xogmaal is a TV show  
15 program. They have no interest with children. These are  
16 the things we need to clean up."

17 Q. All right. So in response, what does Ms. Bock respond?

18 A. The email from Aimee Bock to Hadith Ahmed, dated  
19 March 2nd, 2021, has a short response. It says, "Yes, I  
20 agree."

21 Q. Go to Q86.

22 The first one is what?

23 A. The earlier message?

24 Q. All right. So go to the top.

25 A. On Monday, July 12, 2021, Coley Flynn writes, "Mohamed

1 Mure," I assume it's Muse, "from Xogmaal came in looking for  
2 payments from March, April and May." His cell phone is so  
3 and so and email is so and so.

4 Q. All right. Ms. Mallet, could you highlight, call out  
5 and highlight March, April and May.

6 All right. So take the callout out.

7 What does Ms. Bock say to, writes to Coley Flynn?

8 A. Ms. Bock responds, "Please pull his meal counts for me."

9 Q. Let's go to W2. Go to page 269.

10 When is this, the first check, it's in what month?

11 A. The check on top is, is dated August 6th, 2021.

12 Q. Continue. The next one is?

13 A. Would you like --

14 Q. So the next one to Xogmaal. This is Xogmaal, an  
15 August 6, 2021, check. Do you see that?

16 A. I do.

17 Q. All right. My question, though, between the time frame  
18 that one of Feeding Our Future employees notified Ms. Bock  
19 about a concern, do you have information about the steps  
20 that Ms. Bock took in the interim before issuing those  
21 checks?

22 A. Other than those two emails, nothing really comes to  
23 mind.

24 Q. All right. And one of the emails is to pull the meal  
25 counts?

1 A. The response from Ms. Bock.

2 Q. Okay. And the check that was paid was consistent with  
3 the meal count, correct?

4 A. I would have to double-check and pull them so I can --

5 Q. You don't have any specific information right now?

6 A. Not, not on my hands, no.

7 Q. Let's go to W66.

8 I believe you testified to this. What is this?

9 A. This is the signature card, document that is filled out  
10 on account opening. This particular one is for Bridge  
11 Consulting and Logistics LLC.

12 Q. And just so to be clear, Ms. Bock is not a signatory to  
13 that account, is she?

14 A. The signatory is in the account and not including  
15 Ms. Bock.

16 Q. All right. Go to page 154 of W66.

17 This is a check for \$183,000 to Bridge Consulting  
18 and Logistics LLC, correct?

19 A. Yes.

20 Q. Again, just to be clear, Ms. Bock is not a member of  
21 Bridge Consulting and Logistics LLC.

22 A. No, she is not.

23 Q. I want to shift gears a little bit to Lido Restaurant.  
24 Do you recall your testimony earlier about Lido Restaurant?

25 A. I do. The restaurant in Faribault, Minnesota, yes.

1 Q. Let's go to W225.

2 I'm not going to go through a lot of it, but  
3 nonetheless, this is Lido Restaurant's account with Wells  
4 Fargo, correct? I believe you testified to that earlier.

5 A. Correct.

6 Q. Ms. Bock is not a member of Lido Restaurant, is she?

7 A. No, she is not.

8 Q. Go to page 31 of B225.

9 I believe you testified -- it's tiny. You  
10 testified about transfers, electronic transfers --

11 Would be great if you can. Go to maybe  
12 August 14th.

13 A. September.

14 Q. September 14th. Sorry. There you go. \$170,000. Could  
15 you call it out more or no?

16 A. Highlight will work.

17 Q. Highlight.

18 So you see \$170,000 electronic transfer?

19 A. I do.

20 Q. Now, based on your investigation, that \$170,000 was  
21 based on meal counts submitted by Lido to Feeding Our  
22 Future, correct?

23 A. Correct.

24 Q. Let's go to -- stay on 225. Let's go to page 47.

25 All right. So there's some withdrawals that you

1 testified to.

2 I think let's just take November 19th and  
3 highlight November 19th.

4 Is that a withdrawal, a \$30,000 withdrawal, or is  
5 it a deposit?

6 A. It is a deposit.

7 Q. Oh, all right. So go to -- the next column would be  
8 withdrawal. There you go. It's a withdrawal on the 19th.

9 Is that a \$25,000 withdrawal?

10 A. It's a \$25,010 withdrawal, yes.

11 Q. All right. Go up. There's another withdrawal -- go to  
12 the next page.

13 There's some withdrawals, right? Are those cash  
14 withdrawals or electronic withdrawals? Cash withdrawals?

15 A. They are cash withdrawals, yes.

16 Q. So there's another --

17 A. Yeah. The one on 11/23, the first one on 11/23. The  
18 second one on 11/23. And then there were some transfers.

19 Q. Okay. I was just curious. Are any of those, any of  
20 those withdrawals deposited into Ms. Bock's account, if you  
21 know?

22 A. Are you asking me if cash withdrawals are deposited into  
23 Ms. Bock's account?

24 Q. Yeah.

25 A. Cash is untraceable by its own nature.

1 Q. Okay. But I'm saying, you don't see based on your  
2 investigation, you don't see a \$30,000 deposit into  
3 Ms. Bock's account?

4 A. I'm saying the cash is untraceable. You can't, you  
5 can't trace it from one account to another.

6 Q. Okay. All right. So let's go to page 218 of the same  
7 exhibit.

8 What is this?

9 A. This is a withdrawal slip filled out for the date  
10 December 8, 2020, by Mohamed Hussein.

11 Q. All right. And there's another one at 219. Page 219.

12 I believe you testified to this.

13 A. Yes, both of them.

14 Q. \$20,000 in cash?

15 A. \$20,010, correct.

16 Q. In cash?

17 A. In cash.

18 Q. There's another cash withdrawal of 228. Page 228.

19 That's another cash withdrawal?

20 A. Yes, dated 12/30/2020.

21 Q. All right. But it's a check, right, on page 152. And a  
22 check from Feeding Our Future in November, right?

23 A. Yes.

24 Q. What's the amount?

25 A. The amount is \$176,321.

1 Q. All right. I believe you testified that cash is  
2 untraceable, correct?

3 A. It is very hard to trace cash, correct.

4 Q. And the cash withdrawal that was just listed, you don't  
5 have personal information where it went, do you?

6 A. No.

7 Q. I want to shift gear a little bit to W230.

8 This is an account you testified to owned by, who  
9 is that? It's also Mohamed Hussein, right?

10 A. Yes. The State Bank of Faribault, Count 4, Mohamed Ali  
11 Hussein.

12 Q. All right. And now we're talking about another  
13 organization, not Lido Restaurant, isn't it?

14 A. Yes. This is another organization, Somali American  
15 Faribault Education also known as SAFE.

16 Q. All right. So --

17 A. And the signer for it is Mohamed Ali Hussein.

18 Q. Okay. Let's go to P95. I mean page 95, not P95.

19 So these are series of checks written by  
20 Mr. Hussein to entities and people, correct?

21 A. They are signed by Mr. Hussein, yes.

22 Q. All right. Now, just to make sure, based on  
23 Exhibit 230, Mr. Hussein did not write a check personally to  
24 Ms. Bock, did he?

25 A. Based on these checks?

1 Q. Yes.

2 A. These checks are issued to Bridge Logistics.

3 Q. Okay. And you testified that Ms. Bock is not a member  
4 of Bridge Logistics, correct?

5 A. Ms. Bock is not a member of Bridge Logistics, no.

6 Q. Let's go to Exhibit X66. I want to shift gear a little  
7 bit to Hanna Marekegn.

8 You testified earlier about Ms. Marekegn, didn't  
9 you?

10 A. I did.

11 Q. 66.

12 (Mr. Udoibok confers with Ms. Mallet)

13 Q. Let's see. X6.

14 MR. JACOBS: Your Honor, I'd object to beyond the  
15 scope.

16 THE COURT: Sustained.

17 MR. UDOIBOK: Your Honor, just give me a second.

18 Just a second, Your Honor.

19 (Mr. Udoibok confers with Ms. Mallet)

20 MR. UDOIBOK: Sorry about that.

21 So let's go to W65.

22 BY MR. UDOIBOK:

23 Q. I believe you testified to Exhibit W65 earlier, correct?

24 A. Bridge Logistics LLC bank account, one of the bank  
25 accounts of Bridge Logistics, yes.

1 Q. All right. Now who, who is the owner of that account?

2 A. It is Abdikerm Eidleh.

3 Q. Okay. Go to page 13.

4 Who is the beneficiary of that transaction?

5 A. This is listed as Bridge Logistics.

6 Q. Okay. And I believe you testified earlier that Ms. Bock  
7 has no, is not a member of Bridge Logistics, correct?

8 A. No. It belongs to Mr. Abdikerm Eidleh, which is her  
9 employee.

10 Q. Let me just to make sure -- W. Let's go to W66.

11 Now, you testified about W66 earlier, correct?

12 A. Signature card for Bridge Consulting and Logistics, yes.

13 Q. And the signature card is owned by whom?

14 A. The signature card is for an account for Bridge  
15 Consulting and Logistics, and the account signer is Abdikerm  
16 Eidleh.

17 Q. All right. So let me see. Let's go to page 67.

18 What is that?

19 A. This is statement, either a full statement or partial  
20 statement, for account belonging to Bridge Consulting and  
21 Logistics at Bank of America for September 2021.

22 Q. All right. Go to page 113.

23 How much is being deposited?

24 A. The deposit amount is for \$14,000.

25 Q. And who is the beneficiary of that \$14,000 deposit?

1 A. It is Bridge Consulting and Logistics.

2 Q. And the payment is from which organization?

3 A. From Brava Restaurant in Rochester, Minnesota.

4 Q. Who is the operator of Brava Restaurant or was the  
5 operator of Brava Restaurant?

6 A. At the time it was Sharmake Jama.

7 Q. Let's go, stay on W66. Let's go to page 111.

8 All right. This is a, is it a check or cashier's  
9 check?

10 A. This is a cashier's check.

11 Q. And the cashier's check is remitted by whom?

12 A. Cashier's check remitter is listed Hanna Marekegn.

13 Q. And to which entity?

14 A. The cashier's check is made payable to the order of  
15 Bridge Consulting and Logistics.

16 Q. And who's operates or own Bridge Consulting and  
17 Logistics?

18 A. Abdikerm Eidleh.

19 Q. Is Ms. Bock beneficiary of that check?

20 A. She is not listed on the check, no.

21 Q. Let's go to W50, 261, page 261.

22 This is another check that you testified to  
23 earlier, correct?

24 A. Correct.

25 Q. Also drawn to the benefit of Eidleh Inc., correct?

1 A. It is made payable to the order of Eidleh Inc., yes.

2 Q. And who, who wrote the check?

3 A. The check is from Brava Cafe Inc.

4 Q. And who is the owner of Brava Cafe?

5 A. Hanna Marekegn or Marekegn. I apologize. I never know  
6 the proper pronunciation.

7 Q. That's all right. And it's clear it is not, Ms. Bock is  
8 not a beneficiary of that check, is she?

9 A. Ms. Bock is not listed on this check, no.

10 Q. All right. I want to shift gear a little bit. Let's go  
11 to W78.

12 This is a Wells Fargo bank account, right?

13 A. It is a Wells Fargo bank account, correct.

14 Q. Whose account is it?

15 A. It's the account for Mizal Consulting LLC.

16 Q. Who is the owner?

17 A. The owner is Hadith Ahmed.

18 Q. Is Ms. Bock a signatory to that account?

19 A. Ms. Bock is not a signatory to this account.

20 Q. And when was this account opened?

21 A. It was opened December 23rd, 2020.

22 Q. All right. Go to page I believe 76, if my notes are  
23 correct.

24 This is a check deposit for how much?

25 A. The check amount is \$10,000.

1 Q. All right. This check went into which account?

2 A. Mizal Consulting.

3 Q. So who, who is Mizal Consulting?

4 A. Mizal Consulting, as we said, is Hadith Ahmed.

5 Q. Is Ms. Bock a member of Mizal Consulting?

6 A. Not to my knowledge.

7 Q. Let's go to page I believe 80 of the same exhibit.

8 Page 80 of the same exhibit.

9 This is another deposit, correct?

10 A. This is another check deposited to Mizal Consulting,  
11 correct.

12 Q. From which group is this?

13 A. The entity is Actioncare.

14 Q. All right. The check is not drawn to Ms. Bock's  
15 benefit, is it?

16 A. Her name is not listed on the check, no.

17 Q. Let's go to page 82. It's still Mizal Consulting is  
18 benefitting for \$45,000, right?

19 A. Mizal Consulting received a check from Liban Alishire  
20 for \$45,000, correct.

21 Q. And it is not to Ms. Bock, is it?

22 A. Ms. Bock is not listed on this check.

23 Q. I'm skipping a bit because -- just for time. Let's go  
24 to page 85 of this exhibit.

25 This is a check for 64,809 and no change, correct?

1 A. Correct.

2 Q. From Hope Suppliers?

3 A. Correct.

4 Q. And to the benefit -- who controls Mizal Consulting?

5 A. The check is written to Mizal Consulting, which is  
6 controlled by Hadith Ahmed.

7 Q. Let's go to page 87. This is another check to Mizal  
8 Consulting, correct?

9 A. That's correct.

10 Q. For \$26,000?

11 A. The amount is \$26,000.

12 MR. UDOIBOK: Your Honor, just a moment.

13 No further questions.

14 THE COURT: Thank you.

15 Mr. Montez.

16 MR. COLICH: Your Honor, I'm going to do it.

17 THE COURT: Mr. Colich.

18 MR. COLICH: Thank you.

19 CROSS-EXAMINATION

20 BY MR. COLICH:

21 Q. Must be tired.

22 A. I'm sure everybody is by now.

23 Q. Well, I think we all are.

24 So I'm going to be brief and get you out of here,  
25 if possible. Excuse me.

1           Let's go way back to when you first started  
2     testifying. I think what you basically told us when you  
3     were describing what you do was follow money; is that  
4     accurate?

5     A. Yes.

6     Q. Yes.

7     A. Yes.

8     Q. And you've done that today for us?

9     A. Yes.

10    Q. So as I sit listening to you, I realize it takes someone  
11    who is pretty detailed, organized. Would that be fair to  
12    say?

13    A. I think the team of three forensic accountants  
14    definitely encapsulates that.

15    Q. Okay. And so what I've heard in your testimony today I  
16    think with the government was, sometimes if you go through  
17    all those details, you identify things for us. You have an  
18    opinion or conclusion, or what's a better word? Assumption  
19    that maybe this is how things transpired.

20            Would that be fair to say?

21    A. You would have to be a bit more specific.

22    Q. Yeah.

23    A. Please.

24    Q. You look at the numbers. You look at the paperwork and  
25    you say, I think this is what this person has been doing.

1 A. It has to be substantiated by the bank records.

2 Q. Okay. So what -- excuse me. So, trying to read my  
3 writing. I'm sorry.

4 So when, for instance, my client, Salim Said, when  
5 you were looking and talking with the prosecutor, let's talk  
6 about the kickbacks. Okay?

7 A. Sure.

8 Q. And you know when we're talking about kickbacks, we're  
9 actually talking about the charges in this case identified  
10 as bribery; is that correct? Are you aware of that?

11 A. Could you repeat the question please?

12 Q. Sure. There's been a lot of the use of the word  
13 "kickbacks" in here, even today when you were testifying,  
14 about the checks that Mr. Eidleh's enterprises received from  
15 different sources.

16 A. Correct.

17 Q. But you understand that for the purpose of the jury's  
18 understanding, we're talking about Counts 16 to 40 in the  
19 indictment identified as bribery. If you don't know that,  
20 that's fine.

21 A. I am familiar with those counts, yes.

22 Q. Okay. And so when you look at the checks that you saw  
23 that my client signed, and again I'm just narrowing this as  
24 to the checks that were given or received by Eidleh  
25 enterprises.

1 All right?

2 A. Okay.

3 Q. Do you assume that he is the person who created that  
4 check?

5 A. Do I assume that Mr. Salim Said is the person who  
6 created the check?

7 Q. Yes.

8 A. It's issued out of an account that he controls.

9 Q. And so you assume he determines the amount of the money  
10 that check has to be made for, that Mr. Eidleh eventually  
11 gets?

12 A. If he signs the check that has that amount on it, then  
13 he definitely approves of it.

14 Q. So the assumption is or conclusion you have is that he  
15 was aware of that amount. He created the check.

16 Would that be fair?

17 A. I don't know if you would assume that he personally  
18 created the check, but he signed it, so he assumes the  
19 responsibility for it.

20 Q. Okay. Thank you.

21 All of the checks, and I'm not going to pull them  
22 up.

23 A. Yeah.

24 Q. Thank you. Yeah.

25 All of those checks, and again we're only talking

1 about the checks, lots of checks in this case. We're  
2 talking about the checks that were identified today that  
3 were earmarked or went to Eidleh enterprise, one of the  
4 different enterprises, entities that he had.

5 A. Okay.

6 Q. Not one of those checks I believe, and maybe you can  
7 confirm this, were handwritten other than the signature?

8 A. I think so.

9 Q. So that means they were processed by someone who had the  
10 ability to print those checks, correct?

11 A. Sure.

12 Q. Someone had to print them?

13 A. Sure.

14 Q. So let's talk about Cosmopolitan Business Solutions.  
15 Okay?

16 A. Okay.

17 Q. You identified that I think as part of the Safari group,  
18 which seems to expand beyond the owners of Safari  
19 Restaurant.

20 Would that be fair to say?

21 A. Yes.

22 Q. That's your opinion?

23 A. That is actually what we learned from the investigation.

24 Q. Okay. All right. So can you tell the members of the  
25 jury who the owners of Cosmopolitan Business Solutions were?

1 A. Sure. One of them was Salim Said. Another one was  
2 Abdulkadir Salah, and a third owner is Abdirahman Ahmed.

3 Q. Do you know when the Cosmopolitan was formed?

4 A. Right off the top of my head, no, but I think it extends  
5 beyond 2020.

6 Q. Do you know when Salim Said became part of Cosmopolitan?

7 A. I would have to double-check the records. We have a  
8 pretty detailed date.

9 Q. I'm not going to ask you to do that, but would you agree  
10 that Cosmopolitan Solutions was up and running long before  
11 my client became involved in it?

12 A. As I said, "long before," I would have to double-check.

13 Q. Okay. Do you recall whether or not Cosmopolitan  
14 Business Solutions was created and active prior to my client  
15 becoming a participant in that company?

16 A. I know that it maintained accounts with associated  
17 businesses approximately 2017. I just don't remember when  
18 Mr. Salim became part of the ownership structure.

19 Q. Okay. We'll deal with that with someone else.

20 A. Okay.

21 Q. Okay. Let's talk about -- let me see in my notes, if I  
22 can.

23 Total Financial Services --

24 A. I believe it's Solutions.

25 Q. You are right, it is. I'm tired also, I go.

1                   Can you tell the members of the jury who the  
2 owners of that company was?

3           A.   Based on my recollection, I think one of the owners is  
4 Abdulkadir Salah.

5           Q.   Mm-hmm.

6           A.   I don't know the full membership structure but I do  
7 remember that one of the owners is Abdulkadir Salah.

8           Q.   And have you heard Ahmed Sharif Omar Hussan, Hussan's  
9 name before?

10          A.   Ahmed Omar-Hashim.

11          Q.   Hashim. I'm sorry.

12          A.   Yes.

13          Q.   You're doing better than I am here.

14          A.   We've been working on this case for a long time.

15          Q.   Do you recognize him as being an owner?

16          A.   I don't recall, but it's possible. I would have to  
17 double-check.

18          Q.   Do you recognize him as being a brother of Abdulkadir  
19 Nur Salah?

20          A.   This is what we learned from the investigation, yes.

21          Q.   Okay. And again, what was your understanding that Total  
22 Financial Services, that business, did?

23          A.   I believe the role of Total Financial Solutions was to  
24 help with some of the recordkeeping or bookkeeping, I think,  
25 for a variety of entities, not just Cosmopolitan.

1 Q. Okay. Are you aware that it was an accounting firm?

2 A. I'm aware it had accounting. Yes, I am aware it was  
3 used for accounting purposes.

4 Q. Were you aware that they identified themselves as  
5 business consultants?

6 A. I don't remember. I don't recall that.

7 Q. Okay. Were you aware that they did payroll, wrote  
8 checks for many companies?

9 A. I think that's, I think that's correct.

10 Q. Okay. Are you aware that they wrote checks for  
11 companies they represented, besides payroll checks?

12 A. Could you -- could you repeat?

13 Q. Sure. They also issued checks for clients they  
14 represented who were making payments, different companies,  
15 individuals, et cetera?

16 A. You mean if they printed the checks?

17 Q. Yes, print the checks.

18 A. I don't know that to be true.

19 Q. Okay. But we know that we have two brothers running  
20 total financial -- or I'm sorry. You are not certain of  
21 that. I'm sorry.

22 Okay. Let's just go to Stigma-Free International.  
23 Are you familiar with that?

24 A. I am.

25 Q. Okay. I think when you testified you were talking about

1 it again. Now we have this umbrella of Safari group. And  
2 now we're starting to talk about Stigma-Free International  
3 that sets up sites.

4 Okay? Are you familiar with the sites?

5 A. I am.

6 Q. Okay. And those sites were created after the Department  
7 of Agriculture said restaurants and for-profits can no  
8 longer participate in part of this program, correct?

9 MR. JACOBS: Objection, Your Honor. Beyond the  
10 scope.

11 THE COURT: Overruled.

12 You can answer.

13 THE WITNESS: I am generally aware that they were  
14 set up after October 2020, yes.

15 BY MR. COLICH:

16 Q. Okay. And do you know the name Ahmed Artan?

17 A. Ahmed Artan, yes.

18 Q. Okay. And how do you know his name?

19 A. Because we obtained a large number of accounts and we,  
20 after we subpoenaed them, we reviewed a large number of  
21 accounts, including that of Stigma-Free International.

22 Q. And do you recognize the name Abdinur Salah?

23 A. I do.

24 Q. And again, we've heard the name often of Abdulkadir Nur  
25 Salah, correct?

1 A. Abdulkadir Nur Salah, yes.

2 Q. Yes. Thank you.

3 And are you aware that these are the three  
4 individuals who registered Stigma-Free International?

5 A. I would have to double-check the sequence of events and  
6 the time frame and the actual names of the people who did  
7 that, but I remember there was a transfer at some point in  
8 representatives --

9 Q. Okay.

10 A. -- of this entity, yes.

11 Q. Now, I'm going to go back into the bribes. I'm going to  
12 call them bribes, because that's what they're alleged to  
13 have been, the Counts 16 to 40 which are identified as  
14 bribes in the indictment.

15 Okay?

16 A. Okay.

17 Q. And you talked about some of those. You certainly  
18 talked about my client, correct?

19 A. Correct.

20 Q. You also talked about Olive Management; is that true?

21 A. I did.

22 Q. Who owns Olive Management?

23 A. Olive Management is owned by Ahmed Omar-Hashim.

24 Q. And do you know if Abdinur Salah is a brother of  
25 Omar-Hashim?

1 A. I believe that's what we learned from the investigation,  
2 yes.

3 Q. Okay. So what we have now are three brothers actively  
4 involved in something here; is that fair to say?

5 A. I think it's fair to say.

6 Q. Okay. And so let's go to a few sites. Tunyar Trading.  
7 Who owned Tunyar Trading?

8 A. Tunyar Trading is owned by Abdikadir Mohamud.

9 Q. How about Horseed Management?

10 A. Horseed Management is owned by brothers Abdinasir Abshir  
11 and Asad Abshir.

12 Q. And Feeding Our Youth?

13 A. This feels like a test. Feeding Our Youth is owned by  
14 Hamdi Omar.

15 Q. I have, I can have counsel come back, if you would like?

16 A. I'm sorry?

17 Q. Okay. I'm sorry.

18 And do you know whether or not, do you know  
19 whether or not Total Financial Solutions represented the  
20 individuals who owned those sites?

21 A. I really wasn't very involved in looking at Total  
22 Financial Solutions.

23 Q. Okay. But you can confirm that the exhibits we all saw  
24 today that are being identified as kickbacks or, in my  
25 words, alleged bribes were all checks that were printed.

1 A. Yes, I, yes, I saw that they were, at least the maker,  
2 the -- yes, I saw a good part of them were printed, yes.

3 MR. COLICH: I'm done. Thank you.

4 THE COURT: At this time, we're going to take an  
5 afternoon -- well, yeah, we'll take an afternoon break until  
6 3:30, and then we'll go for 45 minutes more.

7 COURTROOM DEPUTY: 3:35.

8 THE COURT: 3:35. And then we'll go for  
9 45 minutes more or --

10 Does that make sense given what the government  
11 knows about its next witness?

12 MR. THOMPSON: I'm going to defer to Mr. Ebert on  
13 this one.

14 MR. EBERT: Well --

15 THE COURT: You can start for ten minutes or you  
16 can break now. What would you like to do.

17 MR. EBERT: I think I'll speak for the room and  
18 say break for now.

19 THE COURT: Fine. We'll come back at 3:35.

20 All rise for the jury.

21 That's the only time Mr. Ebert gets to speak for  
22 the room.

23 3:08 p.m.

24 **IN OPEN COURT**

25 **(JURY NOT PRESENT)**

1 THE COURT: This is off the record.

2 (Recess taken at 3:09 p.m. till 3:35 p.m.)

3 3:35 p.m.

4 **IN OPEN COURT**

5 **(JURY PRESENT)**

6 THE COURT: You may all be seated.

7 And then just to close the loop, Mr. Jacobs, do  
8 you have any redirect?

9 MR. JACOBS: No, Your Honor. Thank you.

10 THE COURT: All right. Thank you.

11 So the government may call its next witness.

12 MR. EBERT: Thank you, Your Honor. The government  
13 calls Pauline Roase.

14 THE COURT: Thank you.

15 PAULINE ROASE,

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

18 THE WITNESS: Yes.

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

20 And when you are settled please state and spell  
21 both your first and last name for the record.

22 THE WITNESS: Pauline Roase, P-A-U-L-I-N-E  
23 R-O-A-S-E.

24 THE COURT: Thank you.

25 Mr. Ebert.

1 MR. EBERT: Thank you, Your Honor.

2 DIRECT EXAMINATION

3 BY MR. EBERT:

4 Q. All right. Good afternoon.

5 A. Good afternoon.

6 Q. Where do you work?

7 A. I work for the FBI as a forensic accountant.

8 Q. How long have you been a forensic accountant with the  
9 FBI?

10 A. For ten years.

11 Q. And we've heard a bit about this, but can you describe  
12 some of your basic duties and responsibilities as an FBI  
13 forensic accountant?

14 A. Sure. Yeah. As a forensic accountant we get assigned  
15 usually to white-collar cases where there's a lot of, you  
16 know, money involved where there's a lot of financial  
17 transactions. And our primary goal is really to follow the  
18 money, see where it leads.

19 Q. What did you do before FBI?

20 A. I was an auditor with the defense contract audit agency  
21 within the Department of Defense.

22 Q. And do you have any sort of licensure or anything with  
23 respect to your accounting work?

24 A. Yes. I have a CPA license that I received back in 2010.

25 Q. All right. I want to shift gears and get right at it.

1 Are you one of the forensic accountants working on this case  
2 involving the United States versus Aimee Bock and Salim  
3 Said?

4 A. Yes, I am.

5 Q. Now, you may recall at the beginning of this trial, did  
6 we hear from Special Agent Kary as a witness?

7 A. Yes.

8 Q. Among other things, did Special Agent Kary testify about  
9 various investigative steps that were taken throughout 2021  
10 and 2022?

11 A. Yes, he did.

12 Q. Did he testify that those various investigative efforts  
13 ultimately culminated with the execution of search warrants  
14 at multiple locations?

15 A. Yes.

16 Q. And when did that occur, those simultaneous search  
17 warrants?

18 A. That happened January 20th of 2022.

19 Q. And did we hear from Special Agent Kary that that  
20 operation to conduct those search warrants comprised the  
21 largest federal law enforcement operation in the history of  
22 Minnesota?

23 A. Yes.

24 Q. However, were there always so many people working on  
25 this investigation?

1 A. There was not.

2 Q. In fact, because there was teams of people who were  
3 flown in from across the country to assist at that point; is  
4 that right?

5 A. That's right.

6 Q. But in fact did this investigation start as a one-person  
7 investigation?

8 A. In general, yes.

9 Q. And for multiple months after that, did it continue as a  
10 one-person investigation?

11 A. Yes.

12 Q. More specifically, a one-woman investigation?

13 A. Yes.

14 Q. You?

15 A. Yes, it was me.

16 Q. So I want to direct your attention to the very beginning  
17 of that federal investigation.

18 Approximately, when did you begin to work on the  
19 investigation that has given rise to why we are here in this  
20 room?

21 A. I got involved in May of 2021. My understanding is the  
22 case agent at that time had already, had received an MDE  
23 complaint, April of 2021, and had already met with him a  
24 couple times.

25 And after learning about, you know, what their

1 concerns were, the case agent determined that a forensic  
2 accountant was going to be needed on the case. So I joined  
3 shortly after, just May of 2021.

4 Q. And at that point in May of 2021, what types of things  
5 did you start off doing?

6 A. So, well, I wanted to hear for myself from MDE what  
7 their concerns were, and specifically their concerns were  
8 about Feeding Our Future and the number of sites that they  
9 were trying to apply for and also the number of meals they  
10 were purportedly claiming at all of these sites.

11 So we had a Teams meeting shortly after I got on  
12 the case, within a couple weeks, and we -- and so they  
13 basically showed me all sorts of documents.

14 One thing that they showed me was how much Feeding  
15 Our Future had already received through May of 2021, just  
16 the first three months, it was already over \$70 million.

17 And so, and so that was a concern to them, and  
18 basically they gave me a little bit of background about the  
19 program and the distribution sites, and that's where I  
20 started.

21 Q. And after you learned that initial information, what  
22 types of things did you do?

23 A. So then I started issuing grand jury subpoenas to get  
24 the Feeding Our Future bank records. And they had also  
25 provided kind of a list of the sites and how much the sites

1 had already received money by pretty much April, April or  
2 May of 2021.

3 And the by far the largest was Safari Restaurant,  
4 so that's who I started with. That's who I subpoenaed  
5 first.

6 Q. And is it fair to say that from there the scope of what  
7 you looked at continued to broaden?

8 A. It did. So the first, so when I received the bank  
9 account for Safari Restaurant, it was Associated Bank. And  
10 immediately after reviewing it, I could see there was  
11 something very alarming with what was going on with the  
12 movement of money.

13 Q. What do you mean by that?

14 A. So, so when I subpoenaed the bank records, I went back  
15 to before the period in question, which, you know, began in  
16 spring of 2020. I wanted to see how did they separate  
17 before that and what kind of activities their bank account  
18 would show.

19 So I subpoenaed records all the way back to 2018,  
20 and I kind of compared the difference pre-COVID and then  
21 during COVID. And what I noticed was during COVID when the  
22 only source of income was a Federal Child Nutrition Program,  
23 the owners were making six-figure withdrawals to themselves  
24 to newly-created entities.

25 Q. And is one of the owners a defendant in this courtroom

1 in this trial?

2 A. Yes. It's Salim Said.

3 Q. Ultimately, do you know about how many grand jury  
4 subpoenas were thereafter issued as part of the  
5 investigation?

6 A. So, yeah, so after I, so by the time I got the  
7 Associated Bank records, the accounts had already closed at  
8 Associated Bank. So I followed that money. They opened an  
9 account at Bridgewater Bank.

10 By the time I got those records, that was closed,  
11 and I just kept going. Eventually went to Wells Fargo was  
12 open for ten days. Then it went to Bell Bank.

13 And so what I, because of what I was seeing in  
14 this one account, I expanded my scope, and I looked at other  
15 sites that also received large amounts of money. And I just  
16 kept expanding, and I just kept subpoenaing bank records for  
17 those, and I was seeing the same thing.

18 Q. And, Ms. Roase, for the benefit of the court reporter,  
19 just make sure we are able to have her follow.

20 The accounts you just described a moment ago, are  
21 those all specific to Safari Restaurant bank accounts?

22 A. No. So I mean, I started with the Safari Restaurant  
23 bank account, but what I was seeing was transfers to newly  
24 created LLCs so -- and then again with the other, as I  
25 started expanding, I expanded outside of the Safari

1 Restaurant, looking at other sites.

2 Among, among the first ones that I started  
3 subpoenaing records for was Stigma-Free, Shamsia Hopes,  
4 Action For East African People.

5 Q. And ultimately, do you know about how many grand jury  
6 subpoenas were issued in the course of the investigation?

7 A. We are currently very close to 1300 subpoenas.

8 Q. And of what has been gathered -- do you know  
9 approximately how many different financial accounts have  
10 been subpoenaed as part of that investigative tool?

11 A. Yes. We are currently at over 3100 financial accounts  
12 and counting.

13 Q. And is it fair to say that much of your work has been  
14 trying to review all of those financial records?

15 A. Yes.

16 Q. Trying to understand what they mean?

17 A. Yes.

18 Q. To follow the money?

19 A. Right.

20 Q. Now, you mentioned that one of your first steps was to  
21 look at the Feeding Our Future banking activity; is that  
22 right?

23 A. Yes, that's right.

24 Q. Beginning here with Exhibit W2; is that right?

25 A. Yes.

1 Q. And does this show Aimee Bock as the lone signatory on  
2 that account?

3 A. It does.

4 Q. And you indicated that an initial first step was seeing  
5 payments that were going from Feeding Our Future; is that  
6 right?

7 A. Right, yes.

8 Q. To places like we see here on the screen?

9 A. Yes.

10 Q. And what do we see on the screen, which place?

11 A. We see two very large checks from Feeding Our Future to  
12 Cosmopolitan Business Solutions, each over a million  
13 dollars.

14 Q. One of the banking accounts you just testified a moment  
15 ago that you found alarming.

16 A. Yes.

17 Q. I'm showing you on the screen what has been marked, but  
18 not admitted, as Exhibit X55a.

19 And do you recognize that?

20 A. I do.

21 Q. Is that a summary of financial activity to the Feeding  
22 Our Future bank accounts?

23 A. Yes, it is.

24 MR. EBERT: Your Honor, at this time the  
25 government offers Exhibit X55a.

1 THE COURT: Any objection?

2 MR. UDOIBOK: No objection.

3 MR. MONTEZ: No objection.

4 THE COURT: X55a is admitted.

5 BY MR. EBERT:

6 Q. Can you describe what this summary table is that we see  
7 on the screen?

8 A. Yeah. So -- sorry. I like to draw.

9 So you can see this is just actually a summary of  
10 Feeding Our Future deposits -- I'm sorry. It's deposits  
11 into the Feeding Our Future accounts from the Minnesota  
12 Department of Education.

13 And this actually is a combination of two  
14 different bank accounts that Feeding Our Future had. They  
15 initially started at BBVA, and they eventually went to -- I  
16 forgot the other bank. Was it U.S. Bank or Bank of America?

17 But in any case, so this is just the deposits and  
18 just a cumulative total over here (indicating).

19 Q. Now, throughout the trial, the jury has seen a lot of  
20 checks and a lot of other forms of payment. Fair summary?

21 A. Yes.

22 Q. But with respect to payments from the Minnesota  
23 Department of Education to Feeding Our Future, generally  
24 what form did those payments take?

25 A. From MDE to Feeding Our Future?

1 Q. Yes.

2 A. They were usually electronic deposits, which is what you  
3 see here. These are all electronic deposits.

4 Q. And as we scroll down through this multi-page exhibit,  
5 eventually here on page 6 do we start to enter the time  
6 period of when the food program began during the pandemic in  
7 the spring of 2020?

8 A. Yes.

9 Q. And on the right, there's a column that's titled  
10 Cumulative Total?

11 A. Right.

12 Q. What does that mean?

13 A. So it's just, it's just adding up all the deposits as it  
14 goes down.

15 Q. And I'm going to highlight this middle column that's  
16 titled payer/payee. And we see this same occurring payor  
17 that is listed. What's that?

18 A. So, yeah, so that's a Minnesota state MDE. It's their  
19 budget account, so that's -- it's hard to tell specifically  
20 from here what funds these are related to, but these are  
21 from MDE related to the Federal Child Nutrition Program.

22 Q. So that's the federal child money hitting the Bank of  
23 America account?

24 A. Yes.

25 Q. And other accounts for Feeding Our Future?

1 A. Yes.

2 Q. Is that right?

3 A. Yes, yes.

4 Q. And continuing on to February of 2021, directing your  
5 attention to the third row here, can you describe the  
6 activity of federal child money to the Feeding Our Future  
7 account at that point in time?

8 A. Yeah. You can see this is, the deposits into Feeding  
9 Our Future from MDE start getting pretty massive. This is a  
10 \$10.2 million deposit.

11 Q. Which means at that point in time, February of 2021,  
12 what was the cumulative total of federal child nutrition  
13 money that had gone to Feeding Our Future?

14 A. \$55.3 million.

15 Q. Moving ahead to later that year in the spring of 2021 to  
16 the middle row, what do we see occurring on May 6, 2021?

17 A. So that one I believe is the single largest deposit from  
18 Feeding Our Future, or I'm sorry, from MDE into the Feeding  
19 Our Future account. \$17.8 million.

20 Q. Resulting in a cumulative total as of May of 2021 of  
21 what figure?

22 A. \$101 million.

23 Q. And ultimately what is the last deposit of federal child  
24 money that we see in the Feeding Our Future Bank of America  
25 account?

1 A. Yeah. So the last deposit was January 13th of 2022 for  
2 two and a half million. And by that time, the cumulative  
3 total was nearly \$245 million.

4 Q. So this is approximately one week before the federal  
5 operation to conduct all those search warrants?

6 A. Yes. There was actually, when we were about to conduct  
7 the search warrant, there was actually one and a half  
8 million dollars that was supposed to be deposited into this  
9 account by MDE, but because we went overt, they issued a  
10 stop payment on that.

11 Q. And so that 1.5 million did not go forward --

12 A. Right.

13 Q. -- into Feeding Our Future's hands?

14 A. Yes.

15 Q. Now, we've talked a bit about these search warrants that  
16 happened in January 2022, but at the same time, were there  
17 also a series of something called a seizure warrant?

18 A. Yes.

19 Q. And just briefly, what is that?

20 A. Seizure warrant is a legal order to seize assets.

21 Q. And does that also include seizing or freezing funds in  
22 a bank account?

23 A. Yes, it does.

24 Q. And did you and other investigators work to get seizure  
25 warrants in order to freeze money in bank accounts?

1 A. Yes, we did.

2 Q. Did that include Feeding Our Future's bank account?

3 A. That did.

4 Q. And was money frozen?

5 A. Yes, it was.

6 Q. Approximately how much?

7 A. Three and a half million dollars.

8 Q. All right. I'm showing you on the screen Exhibit X52.

9 Can you describe for the jury what we see here?

10 A. Yeah. So, so basically this shows the flow of money  
11 from MDE to the site recipients for the Safari group.

12 So you can see, the request from Feeding Our  
13 Future to MDE was 44.1 million. And MDE paid out 40, just a  
14 little under that amount. And like I said, it's partly  
15 because there was a stop payment. So that last deposit did  
16 not happen.

17 So MDE paid out 44 million. Goes to Feeding Our  
18 Future. Feeding Our Future keeps about \$4 million in  
19 administrative fees. The rest of it you can see goes here  
20 to the defendants and their entities, \$36.1 million, plus a  
21 related party, the Brava Restaurant, which we've heard  
22 about, 3.8 million. So a total of \$40 million relating to  
23 the, the MDE claims was paid out to them.

24 But then -- I'm sorry. I don't know how to erase  
25 it. But the -- then this column (indicating) is Feeding Our

1 Future prepayments of \$3 million. So in total, Feeding Our  
2 Future paid the Safari group \$43.1 million.

3 Q. And when you say "the Safari group," you are referencing  
4 this list of entities that I've highlighted in yellow; is  
5 that right?

6 A. Yes, that's right.

7 Q. And is part of your testimony going forward going to be  
8 to explain the flow of this money to these various parties  
9 on the screen?

10 A. Yes.

11 Q. Next I'm showing you what is a demonstrative exhibit as  
12 X72a. And we'll watch that, and I'll ask you to describe it  
13 in a moment. Okay?

14 A. Okay.

15 (Video recording played)

16 Q. And I paused it just to orient the jury. At the bottom  
17 left corner do you see a date?

18 A. I do.

19 Q. And what is that date?

20 A. It says April 2019.

21 Q. And this is approximately when in relation to when the  
22 Federal Child Nutrition Program funds at issue began?

23 A. It's about a year before that.

24 Q. And we see a series of red dots on this map of  
25 Minnesota. Do you see that?

1 A. Yes, I do.

2 Q. Who are those?

3 A. Those are the sites under the Feeding Our Future  
4 sponsorship.

5 Q. Okay. And then in the upper right, there are certain  
6 facts and figures. Can you describe those, please?

7 A. Yes. This is the cumulative total, and I want to say it  
8 started January of 2018. So from January 2018 to April of  
9 2019, this was the total claims, 1.1 million, with 678,000  
10 meals claimed.

11 Q. One year before the pandemic began, correct?

12 A. Right, yes.

13 Q. And as I hit play, as a preview here are we going to see  
14 an increase?

15 A. You will see a very large significant growth.

16 THE COURT: And just before you do that, I just  
17 want to note for the jury that a demonstrative exhibit means  
18 that it isn't admitted into evidence. It's for you to view,  
19 but you will not have it back in the jury room when you are  
20 deliberating.

21 MR. EBERT: Thank you.

22 (Video recording played)

23 BY MR. EBERT:

24 Q. Now I've paused it at October 2020. This point, it's  
25 approximately how many months into the Federal Child

1 Nutrition Program with Feeding Our Future?

2 A. It's about six months.

3 Q. We've seen a growth; is that correct?

4 A. Yes.

5 Q. Now there's a difference in color. Can you describe  
6 that difference in color?

7 A. Yes. The yellow ones are part of the Safari group. So  
8 you can see there's a Rochester dot. There's a couple  
9 around the metro area. And then there's one in St. Cloud.

10 Q. But to be clear, whether it's red or whether it's the  
11 Safari group in yellow, all of these denoted on this map are  
12 under the sponsorship of which party?

13 A. Of Feeding Our Future.

14 (Video recording played)

15 Q. And so as this ends, what month do we see?

16 A. This is December of 2021.

17 Q. And by that point, can you describe the facts or the  
18 figures in the upper right-hand corner?

19 A. Yes. So from January 1st of 2018 through December of  
20 2021, a total of \$246 million in claims has been paid out to  
21 Feeding Our Future, with a total of 91.5 million meals  
22 purportedly served.

23 Q. Purportedly served, right?

24 A. Yes.

25 Q. And so there are a series of sites that we see here in

1 the Twin Cities area, correct?

2 A. Yes.

3 Q. And can you just point out on this map a couple other  
4 locations that the jury has heard about in this trial?

5 A. Related to the Safari group or in general?

6 Q. Related to the Safari group.

7 A. Yeah. So there's Brava Restaurant down in Rochester  
8 here. Mankato, Willmar. Let's see. These two. They're  
9 Stigma-Free sites. There was one Stigma-Free site also in  
10 St. Cloud, but Olive Management also operated in St. Cloud.

11 Q. Now, directing your attention back to the Twin Cities  
12 area, do you see what is sort of a highest peak resulting  
13 from a site there?

14 A. Yes.

15 Q. Which color is that highest peak?

16 A. It's yellow.

17 Q. And in fact does that show here as the highest point  
18 statewide?

19 A. Yes, by far.

20 Q. What is that?

21 A. That's Safari Restaurant, just their site.

22 Q. And you mentioned the work you've done to follow the  
23 money; is that right?

24 A. Yes.

25 Q. Okay. Did you take steps to look at the banking

1 activity of Safari Restaurant?

2 A. I did.

3 Q. On the screen we see a series of exhibits. Can you  
4 describe what we see?

5 A. Yeah. So the upper right corner, that is a still image  
6 from our surveillance camera of Safari Restaurant. And the  
7 bottom right is a check from Feeding Our Future, which is  
8 Aimee Bock on the upper left there, to Safari Restaurant for  
9 \$1.1 million, which is to Salim Said on the bottom left.

10 Q. And was Mr. Salim Said an account signatory for the  
11 Safari Restaurant or Cosmopolitan bank accounts?

12 A. Yes, he was.

13 Q. All right. I'm showing you up on the screen Exhibit X3.  
14 And are there two sets of financial activities that are  
15 tracked here?

16 A. Yes, there are.

17 Q. And on the second page, which we're going to walk  
18 through in a moment, is the second page account activity  
19 during the time frame at issue?

20 A. Yes, it is.

21 Q. Which is what?

22 A. It's a summary from April 1st of 2020 to January 21st of  
23 2022.

24 Q. Now, you testified a moment ago that one of the things  
25 you looked at was the banking activity of Safari prior to

1 the federal child program; is that right?

2 A. Yes.

3 Q. And is that what we see on page 1?

4 A. Yes, it is.

5 Q. Specifically, a summary of their activity from what time  
6 frame?

7 A. So like I said, when I subpoenaed the bank records, I  
8 would always try and go back to January 1st of 2018, if it  
9 was, you know, an existing entity or individual account.

10 So this is a summary starting from that period all  
11 the way to March 31st of 2020.

12 Q. And so in this time period of before the Federal Child  
13 Nutrition Program -- first of all, what is on the left  
14 underneath the category of Net Sources of Funds?

15 A. Yeah. So, so this is, and actually, you know, sorry.  
16 Right up here, it says combined accounts. So I just want to  
17 make clear that this is basically all accounts that I had,  
18 you know, talked about, the Associated Bank, Bridgewater.

19 But at this time it was only Associated Bank. So  
20 you can see the rest, the sources of funds is basically what  
21 were the deposits into those bank accounts at Associated  
22 Bank.

23 Q. And so specifically, do we see approximately \$961,000 in  
24 restaurant income for Safari?

25 A. Yes. Right, yes.

1 Q. And what's the net total of funds in from January 18th  
2 through March of 2020?

3 A. \$1.2 million.

4 Q. Okay. Now that's the net sources of money in, right?

5 A. Yes.

6 Q. What's on the right-hand column?

7 A. So basically just expenditures, how that money was used,  
8 how that money flowed out of the bank account.

9 Q. And generally speaking, what do we see was done with  
10 that approximately \$1.2 million?

11 A. So I categorize them as other payments as basically it's  
12 a catchall for all, it appeared to be, you know, just  
13 regular operational expenses, nothing, you know, too  
14 significant to note.

15 But in the next one is food expense, \$317,000.  
16 Then we've got \$170,000 to individuals, which could be in  
17 part payroll. And you can see the Safari Restaurant owners  
18 and the defendants, how much they received, which was about  
19 \$11,000.

20 Q. From a perspective of tracking this activity, anything  
21 particularly significant about what you see here for sources  
22 in/funds out for the Safari Restaurant prior to the  
23 pandemic?

24 A. I mean in general this really, there's nothing that  
25 really stuck out to me. I mean, I could see the food

1 expense was maybe about a third of the, you know, total  
2 money coming in.

3 Q. Not particularly surprising for a restaurant?

4 A. Right. No.

5 Q. So now let's switch gears and look at the time period  
6 after Safari enrolled in the Federal Child Nutrition  
7 Program.

8 And starting on the left, we'll enlarge this. Can  
9 you describe what we see for the sources of funds for Safari  
10 Restaurant?

11 A. Yeah. So, so you can see the number one category is the  
12 food program income at \$16.5 million. And I put a note here  
13 that this all came in after May of 2020. Compare that with  
14 the restaurant income, which stopped just before May of  
15 2020. And so --

16 Q. And just to interject. I'm sorry to interrupt you. But  
17 when you say that the restaurant income stops --

18 A. Yes.

19 Q. -- can you please clarify what you mean by that?

20 A. Well, what I was seeing before was, you know, it's, it's  
21 these same categories, right, event income, credit card  
22 income. And they did a little bit of food delivery.

23 But then it stopped completely. I stopped seeing  
24 that starting May of 2020.

25 Q. In other words, their normal activity as a

1 run-of-the-mill restaurant, changed?

2 A. Yes.

3 Q. Stopped seeing the normal type of customer traffic?

4 A. Right.

5 Q. Okay. And instead the business shifted to what?

6 A. It shifted to entirely focusing on the Federal Child  
7 Nutrition Program.

8 Q. Okay. And so at the top, can you describe some of the  
9 deposits we see that were part of that 16.5 million?

10 A. Yeah, so by far the largest is from Feeding Our Future  
11 of 15.6 million. Bet on Better Future, which is a related  
12 party of the Safari Group, \$800,000.

13 And then these other three, they also, well, All  
14 Smiles Child Daycare and Star Learning, they also  
15 participated in the food program. Gaur Limited, that's --  
16 participated in the food program as well down in Rochester.

17 Q. Now, in that image before, you testified I believe that  
18 prior to the pandemic approximately one third of the money  
19 in was spent by the restaurant on food?

20 A. Right.

21 Q. Did you see similarly once the federal child program  
22 started that about one third of the money in was spent by  
23 Safari Restaurant on food?

24 A. Not even close.

25 Q. Directing your attention below, can you describe what is

1 enlarged on the screen?

2 A. Yeah, so, so basically what this is, like the first line  
3 percentage of net deposits derived from food program, so  
4 basically it's that food program income category divided by  
5 the total income. So that's 99.7 percent. So essentially  
6 almost all of it was just food program money.

7 And then the percentage of net deposits spent on  
8 food purchases, there's a food expense category on the right  
9 side. And so again I just took that and divided by the  
10 total deposits in, and that was only 4.1 percent.

11 Q. So in other words, just shy of 100 percent of the money  
12 into that account came from where?

13 A. Came from Feeding Our Future.

14 Q. Which was comprised of what money?

15 A. Federal Child Nutrition Program funds.

16 Q. And of that money that came in from Feeding Our Future  
17 in child nutrition food funds, 4.1 percent of that was spent  
18 on ostensibly food purchases?

19 A. Yes.

20 Q. Was that significant to your investigation?

21 A. Yes.

22 Q. Can you explain why?

23 A. Well, like I said, you know, I wanted to compare. I  
24 don't have experience in this type of field, so I just  
25 wanted to be able to compare to something, you know, real

1 that, you know, how did this restaurant in particular  
2 operate before the food program and just to see is there  
3 going to be, you know, a noticeable difference.

4 And yes, definitely. And so that was very  
5 significant. I wanted to know where the rest of the money  
6 went if it did not go for food.

7 Q. And on the right, do we see where the rest of that money  
8 went?

9 A. Yes.

10 Q. In the top right, can you describe what we see for net  
11 uses of those funds?

12 A. Yeah. So the Safari Restaurant owners and defendants is  
13 their own kind of, you know, master category, and you can  
14 see a total of \$5.6 million went to the owners.

15 Q. And within the 5.5 million going to the owners, who is  
16 the largest recipient of the money from the Safari owners?

17 A. Well, the largest is Salim Limited, which is Salim  
18 Said's entity, plus a little bit I believe went to his  
19 personal account at 1.9 million, but I would point out this  
20 as well. Anisa Chekchekani is Salim Said's wife.

21 Q. And how much went to her of this Federal Child Nutrition  
22 Program money?

23 A. \$133,500.

24 Q. So just over, what, approximately 2.1 million of the  
25 money that went to the Safari Restaurant owners went to

1 Salim Said in some capacity; is that right?

2 A. Yes. Right.

3 Q. And there are a series of parties that are listed here.  
4 I will enlarge the next batch below, which has the title of  
5 Other Codefendants.

6 A. Yes.

7 Q. Can you describe that?

8 A. Yeah. So basically these are not the Safari Restaurant  
9 owners. They are the other defendants in this case.

10 Q. Okay. And so what, can you describe some of the  
11 entities and payments we see enlarged on the screen?

12 A. Yeah. So \$5 million in total went to other  
13 codefendants. You can see by the far the largest Olive  
14 Management, which is Ahmed Omar-Hashim, personally got  
15 \$1 million.

16 Then you see, you know, Tunyar Trading which is --  
17 and Horseed Management, they were both Stigma-Free sites.  
18 They both received 950,000. There is ASA Limited where  
19 Salim Said is also, you know, part owner.

20 Q. The "S" in ASA?

21 A. Yes.

22 Q. And how much money went from Salim Said's Safari  
23 Restaurant account to Salim Said's ASA Limited account?

24 A. \$909,000.

25 Q. And what else do we see here?

1 A. Then we see AG Limited, Ahmed Ghedi 722,000.

2 Q. And is he one of the two "As" in ASA?

3 A. He is. He is the other "A." Right.

4 Aimee Bock got \$310,000 from the Safari Restaurant  
5 account. And then below that, that's 1130 Holdings,  
6 Abdihakim Ahmed, he's the other "A" in the ASA.

7 Q. And he received how much?

8 A. He received 87,500.

9 Q. Below that we see a reference to Abdikerm Eidleh,  
10 various entities?

11 A. Yes. It's the four that we've heard about in this  
12 trial.

13 Q. And how much was paid from the Safari account to  
14 Mr. Eidleh and his various entities?

15 A. \$61,000.

16 Q. And beneath that there's a line item. Can you describe  
17 what that is?

18 A. Yeah. That's the Feeding Our Future GoFundMe. There  
19 was a donation of 5,750 from the Safari Restaurant account.

20 Q. And beneath that category, there's one titled Related  
21 Parties. Can you describe what that is?

22 A. Yes. Related Parties, it's a little bit more difficult  
23 to describe, but it's -- I've got it at about, you know, two  
24 point -- showing about \$2.8 million going to related parties  
25 out of the Safari account.

1                   And the number one you can see is Brava Restaurant  
2                   down in Rochester, \$919,000.

3                   Q.   Now, there's a reference here in the second item to  
4                   Premium Fresh Produce.   Do you see that?

5                   A.   Yes.

6                   Q.   Can you explain what Premium Fresh Produce is in your  
7                   investigation?

8                   A.   So they're a purported wholesaler of food.   I think  
9                   we've heard from Brava Restaurant -- from Sharmake Jama  
10                  about the Premium Fresh Produce, how they would deliver  
11                  food, but he never saw any invoices.   They just dropped off  
12                  food, asked for a check.

13                  Q.   And is this the entity for which we've seen a Como Park,  
14                  or excuse me, a Como Avenue address in St. Paul?

15                  A.   Yes.

16                  Q.   Likewise, is there a reference to Afro Produce?

17                  A.   There is.

18                  Q.   With expenditures of about 250,000; is that right?

19                  A.   Yes.

20                  Q.   Have we also seen throughout the trial and the  
21                  investigation invoices that purport to show food involving  
22                  Afro Produce?

23                  A.   Right.   Yes.

24                  Q.   Did you take steps to investigate Premium Fresh and Afro  
25                  Produce?

1 A. Yes.

2 Q. Can you explain?

3 A. So as I was trying to follow the money and looking for  
4 food purchases, I noticed there's a significant amount of  
5 money that Safari Restaurant was paying Premium Fresh  
6 Produce and Afro Produce.

7 And I was a little bit concerned about the Premium  
8 Fresh Produce because I looked up their Secretary of State  
9 filing, and they were just formed, I want to say, October of  
10 2020, and they started receiving large checks.

11 Q. Why were you concerned about that?

12 A. For a couple reasons. One is, I don't know how they  
13 were able to start operating so efficiently immediately and  
14 receive six-figure checks from people like Safari  
15 Restaurant.

16 Q. So it's an entity that began during the pandemic?

17 A. Yes.

18 Q. Approximately six months after the Federal Child  
19 Nutrition Program began --

20 A. Right.

21 Q. -- is that right?

22 A. Right.

23 Q. Did you attempt to get record from Premium Fresh or Afro  
24 Produce?

25 A. I did. So because of my concern and, yeah, so because

1 of my concern, we issued grand jury subpoenas to these  
2 entities directly to get financial records or their, you  
3 know, invoices and just whatever records they had for the  
4 Safari group.

5 Q. And in summary, did the response records you got from  
6 Premium Fresh Produce and Afro Produce alleviate the  
7 concerns you had?

8 A. It did not.

9 Q. What happened?

10 A. A couple things. I guess one was the invoices still do  
11 not match the payments. I could not match the payments. I  
12 was an auditor. I'm trying to find or trying to reconcile  
13 basically the invoices to the payments. And it didn't even  
14 come close. It didn't make any sense.

15 Q. So the money did not match the bank records, correct?

16 A. Right.

17 Q. In addition, did the invoices that those two produce  
18 entities provided to the investigation, did those invoices  
19 match the invoices that we've seen throughout this trial?

20 A. In large part, no. They were different.

21 Q. How so?

22 A. Well, so, you know, ones that we, you know, recovered  
23 from, say, you know, Park Avenue or Feeding Our Future,  
24 trying to reconcile those to what Premium Fresh and Afro  
25 Produce provided to us via grand jury subpoena, it largely,

1 it did not match.

2 Q. Okay. And so in summary, was that significant to the  
3 investigation?

4 A. It was. I, I could not, I just could not quantify  
5 whether there was any food purchased at all or if these were  
6 just fabricated invoices.

7 THE COURT: We're going to stop there for the day.  
8 And we'll return at 9:00 tomorrow morning. Give yourself  
9 plenty of time. My understanding is the weather may not be  
10 in our favor.

11 So I'll see you all at 9:00 tomorrow morning.

12 All rise for the jury.

13 4:18 p.m.

14 **IN OPEN COURT**

15 **(JURY NOT PRESENT)**

16 THE COURT: I don't think you have to move too  
17 many of your things. Ms. Concepcion can work around yours,  
18 and it's Doug Olson for the defendant in this next case. So  
19 if you leave him a little bit of room, you are going to be  
20 fine, although.

21 MR. UDOIBOK: Can I just take, can I --

22 THE COURT: Yeah, I would move that a little bit.  
23 The next defendant is in custody, so --

24 MR. UDOIBOK: All right.

25 THE COURT: Just to be safe, but Mr. Olson can

1 work around that for sure.

2 All right. We'll see you all tomorrow morning.

3 MR. THOMPSON: Your Honor, if I may, just one more  
4 thing.

5 I do anticipate we will rest tomorrow. At least I  
6 hope we will rest tomorrow. Will we be rolling into the  
7 defense case tomorrow afternoon, then?

8 THE COURT: You will be rolling into the defense  
9 case tomorrow afternoon if you rest tomorrow. And so we'll  
10 take a brief break for any motions and to do a colloquy for  
11 either or both defendants, depending on what happens.

12 MR. THOMPSON: Thank you, Your Honor.

13 MR. MONTEZ: So, Your Honor, then we have an  
14 interpreter that's going to be coming in potentially. Can  
15 we tell the interpreter to be here tomorrow afternoon?

16 THE COURT: I don't know which -- it will depend  
17 on Mr. Udoibok's case and depend on who you need the  
18 interpreter for.

19 MR. MONTEZ: And if we present --

20 THE COURT: I'll let you all discuss that. Does  
21 that make sense?

22 MR. MONTEZ: Yeah, I guess my question is --

23 (Counsel confer)

24 MR. MONTEZ: Okay. We'll figure it out, Judge.

25 THE COURT: Yeah. Mr. Udoibok and his client will

1 go first. So it will depend on what they do. And then  
2 we'll come to you.

3 MR. MONTEZ: Okay.

4 THE COURT: Fair?

5 (Counsel confer)

6 THE COURT: We are having trial on Friday, yes to  
7 trial on Friday.

8 (Court adjourned at 4:20 p.m., 03-04-2025.)

9 \* \* \*

10

11 I, Renee A. Rogge, certify that the foregoing is a  
12 correct transcript from the record of proceedings in the  
13 above-entitled matter.

14

15 Certified by: /s/Renee A. Rogge  
16 Renee A. Rogge, RMR-CRR

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