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UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America,)	File No. 22-cr-223
)	(NEB/DTS)
Plaintiff,)	
)	
v.)	
)	Courtroom 13W
Aimee Marie Bock(1),)	Minneapolis, Minnesota
Salim Ahmed Said(3),)	Friday, March 7, 2025
)	10:53 a.m.
Defendants.)	
)	

BEFORE THE HONORABLE NANCY E. BRASEL
UNITED STATES DISTRICT COURT DISTRICT JUDGE
VOLUME XVI - 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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* * *

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AIMEE BOCK

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* * *

1 10:53 A.M.

2 **IN OPEN COURT**

3 **(JURY PRESENT)**

4 THE COURT: You may all be seated.

5 The witness remains under oath.

6 SONJA JANSMA,

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

8 examined and testified as follows:

9 THE COURT: Mr. Thompson, you may begin.

10 DIRECT EXAMINATION

11 BY MR. THOMPSON:

12 Q. Good morning.

13 A. Good morning.

14 Q. Welcome back.

15 A. Thank you.

16 Q. When we left off on Thursday, was it Thursday yesterday,
17 Thursday, you were talking about the spending of the fraud
18 proceeds; is that right?

19 A. Yes.

20 Q. And that was with respect to certain counts; is that
21 right?

22 A. Yes.

23 Q. What crimes were charged in those counts?

24 A. Money laundering.

25 Q. Okay. And a specific type of money laundering; is that

1 right?

2 A. Yes.

3 Q. What kind of money laundering?

4 A. It was a Count 1957, which is spending of over \$10,000
5 for the acquisition of property with money acquired by
6 committing a crime.

7 Q. Okay. And specifically, I'll direct your attention to
8 Government Exhibit U8. When we left off the day, you were
9 talking about the purchase of this property here; is that
10 right?

11 A. Yes.

12 Q. And remind us again what property we were discussing?

13 A. 2722 Park Avenue in Minneapolis.

14 Q. And there's a second street address, 2742 Park Avenue,
15 that was part of this transaction; is that right?

16 A. Yes, that's correct.

17 Q. What property is that?

18 A. It's the adjacent parking lot.

19 Q. I'm putting back on the screen Government Exhibit T38,
20 which was the exhibit we were looking at when we left off
21 yesterday.

22 And it's, specifically it's an email from
23 Abdulkadir Salah to Defendant Salim Said and Salah Donyale;
24 is that right?

25 A. That is correct.

1 Q. The partners in Safari Restaurant?

2 A. Yes.

3 Q. Okay. Attached to this email is an operating agreement
4 for Cosmopolitan Business Properties; is that right?

5 A. Yes.

6 Q. You are familiar with that entity?

7 A. Yes, I am.

8 Q. How so?

9 A. We looked at the bank account records.

10 Q. And why did you look at the bank account records for
11 this property?

12 A. Because money from the food program was transferred to
13 these accounts.

14 Q. And how was that money ultimately used?

15 A. The money was ultimately used to purchase the property
16 on Park Avenue.

17 Q. And directing your attention to page 14 of this
18 operating agreement, that's signed by the four partners in
19 Cosmopolitan Business Properties LLC?

20 A. Yes.

21 Q. And who are those four partners in the business?

22 A. Abdulkadir Salah, Salim Said, Ahmed Ghedi and Ahmed
23 Omar-Hashim.

24 Q. And the date they signed this operating agreement for
25 this new company?

1 A. June 17th, 2021.

2 Q. I'm showing you now what's been admitted as Government
3 Exhibit T36, which is an email sent six days later on June
4 23rd, 2021; is that right?

5 A. Yes.

6 Q. And what is attached to this email?

7 A. A signed purchase agreement.

8 Q. For which property?

9 A. 2722 and 2742 Park Avenue.

10 Q. And this is sent to among others Defendant Salim Said;
11 is that right?

12 A. That is correct.

13 Q. And according to the body of the email here, what are
14 the, what's the general items of this transaction?

15 A. Quick closing, cash purchase, 100 percent, can close as
16 soon as you finish the title work.

17 Q. And what's the purchase price for this cash real estate
18 purchase?

19 A. \$2,780,000.

20 Q. And the attachment is the actual purchase and sale
21 agreement; is that right?

22 A. That is correct.

23 Q. For this property? Again, the purchaser Cosmopolitan
24 Business Properties?

25 A. Yes.

1 Q. Whose entity is that?

2 A. That is in part Salim Said's entity, along with his
3 coconspirators.

4 Q. And the purchase price is \$2,780,000?

5 A. Correct.

6 Q. The closing date of by July 15th, 2021?

7 A. That is correct.

8 Q. I want to direct your attention to page 19 of this
9 exhibit, which is the signature page; is that right?

10 A. Yes.

11 Q. Who signed on behalf of the purchaser Cosmopolitan
12 Business Properties?

13 A. That is Salim Said's signature.

14 Q. And what did he list his title at Cosmopolitan Business
15 Properties?

16 A. General manager/president.

17 Q. Now this company had just been created; is that right?

18 A. Correct.

19 Q. And after it was created, was there a bank account
20 opened in the name of it?

21 A. Yes, there was.

22 Q. I'm going to show you what's been admitted as Government
23 Exhibit W82. What are we looking at here?

24 A. This is a Bridgewater Bank account owned by Cosmopolitan
25 Business Properties LLC, opened on July 2nd, 2021.

1 Q. About two weeks after the entity was formed?

2 A. Yes.

3 Q. What's the address listed for the company?

4 A. 2722 Park Avenue.

5 Q. And this first page, does it list the signatories on the
6 account?

7 A. Yes, it does.

8 Q. Before we talk about who they are, can you remind us
9 what does it mean to be a signatory on a bank account?

10 A. That means that you have access to the funds in the
11 account.

12 Q. Who are the four signatories on this newly created
13 Cosmopolitan Business Properties LLC bank account?

14 A. Abdulkadir Nur Salah, Salim A. Said, Ahmed Sharif
15 Omar-Hashim and Ahmed Ghedi.

16 Q. All defendants in this case?

17 A. Correct.

18 Q. Ms. Jansma, did you look at the records of this account?

19 A. Yes.

20 Q. Why?

21 A. Because of the volume of money that was deposited into
22 this account.

23 Q. We'll look at the details in a second, but generally can
24 you explain to the jury what you found when you looked at
25 this Cosmopolitan Business Properties account?

1 A. There were very few transactions. It was just large
2 dollar deposits and then one large wire out to purchase the
3 property at closing.

4 Q. This is the entirety of the bank records; is that right?

5 A. That is correct.

6 Q. Okay. So we'll just turn to page 2. And what do we see
7 here?

8 A. This is the initial account statement for the
9 Cosmopolitan Business Properties account at Bridgewater
10 Bank.

11 Q. Okay. And the date on this statement?

12 A. July 30th of 2021.

13 Q. All right. And what do we see here on this very first
14 statement here, this bank account?

15 A. There are three deposits, four debits, and it shows the
16 \$840,000 deposit on July 2nd, \$890,000 on July 2nd. And
17 they indicate that one is from account 7426, and one is from
18 account 7053.

19 There's also an additional deposit on July 2nd of
20 1,020,000.

21 Q. All that money got deposited on the same day the account
22 was opened; is that correct?

23 A. That's correct.

24 Q. And these transfers that are listed here, the 840,000
25 from account 7426 per Abdul and the \$890,000 transfer from

1 account ending in 7053 per Salim, do you know which accounts
2 those came from?

3 A. Yes, we also looked at those bank accounts.

4 Q. And which accounts did they come from?

5 A. They came from Abdulkadir Salah's bank account and Salim
6 Said, his bank account, the Salim Limited LLC.

7 Q. Okay. And let's take a look at that. Here at page 5,
8 we have the deposits into the checking account; is that
9 right?

10 A. Yes, those were the cash deposits or they were checks
11 that were deposited.

12 Q. And the first one here, what do we see?

13 A. The check from AG Limited for \$560,000.

14 Q. And what is AG Limited?

15 A. That is an entity owned by Ahmed Ghedi.

16 Q. And who is Ahmed Ghedi with respect to this case?

17 A. He is also one of the account owners.

18 Q. Defendant in this case?

19 A. Yes, he's a defendant in this case.

20 Q. And then the next check deposited that same day?

21 A. Yes, this is from Olive Management for \$460,000.

22 Q. So two wire transfers into the account and two checks
23 deposited; is that right?

24 A. They weren't wires. They were just account-to-account
25 transfers.

1 Q. Okay.

2 A. Within the same bank.

3 Q. Okay.

4 A. Yeah.

5 Q. And then if we direct your attention to page 10, what do
6 we see here?

7 A. This is a request form for a domestic wire out of the
8 account.

9 Q. Out of this Cosmopolitan Business Properties account?

10 A. Yes, correct.

11 Q. What's the amount of the wire transfer out of the
12 account?

13 A. \$2,735,000.

14 Q. And it's from Cosmopolitan Business Properties, but who,
15 to whom is that wire being, that \$2.7 million being wired?

16 A. The funds are being sent to First American Title
17 Insurance Company.

18 Q. And directing your attention to page 13, there's some
19 more information about this wire transfer request; is that
20 right?

21 A. Yes.

22 Q. What's the amount of the wire listed here?

23 A. \$2,735,000.

24 Q. And who requested the wire, according to this
25 information on the bank account?

1 A. Abdulkadir Nur Salah and Salim Said.

2 Q. That's Defendant Said in this case?

3 A. Yes, it is.

4 Q. Ms. Jansma, did you -- earlier yesterday you talked
5 about tracing the funds used to purchase both the house,
6 Defendant Said's house and the two cars that he purchased;
7 is that right?

8 A. Yes.

9 Q. Did you conduct a similar analysis with respect to this
10 purchase of this old historic mansion at 2722 Park Avenue
11 South?

12 A. Yes.

13 Q. And did you create another chart summarizing your
14 tracing of the funds used to purchase the property?

15 A. Yes, I did.

16 Q. I'm going to show you now what's been marked, but not
17 yet admitted, as Government Exhibit U19. Is this the chart
18 you created?

19 A. Yes, it is.

20 Q. Did you create it using the same methods that we
21 discussed during your testimony yesterday?

22 A. Yes.

23 MR. THOMPSON: Your Honor, I move to admit
24 Government Exhibit U19.

25 THE COURT: Any objection?

1 MR. UDOIBOK: No objection.

2 MR. MONTEZ: No objection.

3 THE COURT: U19 is admitted.

4 BY MR. THOMPSON:

5 Q. All right. Ms. Jansma, this one's got a lot going on.
6 We'll start at the bottom. I think that was kind of the
7 easiest way to do it.

8 Would you agree?

9 A. Sure.

10 Q. What's shown on the bottom of this flow chart?

11 A. The bottom is a photo of the building that was
12 purchased, and the closing date was July 23rd, 2021, showing
13 the \$2,780,000 purchase price.

14 It also lists who the owners are, Abdulkadir
15 Salah, Salim Said, Ahmed Omar-Hashim and Ahmed Ghedi.

16 Q. Okay. When you put this chart together, what were you
17 looking to discover or to determine to show?

18 A. To show what was purchased with the money that was
19 purportedly being sent out for reimbursement for serving
20 meals to children.

21 Q. To determine whether or not this property was purchased
22 using Federal Child Nutrition Program funds?

23 A. That's correct.

24 Q. Was it?

25 A. Yes, it was.

1 Q. Let's take a look. Okay. You trace back that
2 \$2.7 million that was used to purchase the property. Where
3 did you trace it to? Where did it come directly from?

4 I think we just looked at some of this; is that
5 right?

6 A. Right, yes. It came from each of the four owners. The
7 Olive Management account, which is Ahmed Omar-Hashim, he put
8 the \$50,000 down for the earnest money and then transferred
9 460,000 into the new entity's account.

10 Salim Limited, on behalf of Salim Said,
11 transferred \$890,000. Ahmed Ghedi transferred 560,000 from
12 his entity AG Limited. And then Abdulkadir Salah
13 transferred 840,000 from his entity, 3017 LLC.

14 Q. Okay. So this shows that what we looked at earlier,
15 which is that the \$2.7 million used to purchase this
16 property came from Defendant Salim Said through his entity
17 Salim Limited, correct?

18 A. Correct.

19 Q. As well as Ahmed Omar-Hashim through his entity Olive
20 Management?

21 A. Correct.

22 Q. Which ran a food site; is that right?

23 A. Right.

24 Q. As well as Ahmed Ghedi and his entity AG Limited?

25 A. Yes.

1 Q. And finally Abdulkadir Salah through his entity 3017
2 LLC; is that right?

3 A. That is correct.

4 Q. So now we know where the money came from originally.
5 How did you go about looking to determine whether or not
6 those funds were proceeds of this fraud scheme, this Federal
7 Child Nutrition Program funds?

8 A. Well, we followed the money backwards to see where the
9 deposits were into each of those accounts to determine the
10 source of the funds.

11 Q. Okay. And let's take a look at what we find. It kind
12 of came from several sources; is that right?

13 A. Yes.

14 Q. Can you walk us through kind of what we see here?

15 A. Okay. Well, starting on the left, you can see that
16 Olive Management was paid almost \$4 million from Feeding Our
17 Future as reimbursement for serving meals.

18 Q. Is that for the site that was, the Olive Management site
19 located in St. Cloud, Minnesota?

20 A. Yes.

21 Q. Okay.

22 A. And then the next entity over is Stigma-Free
23 International Inc., which received by this date, I should
24 have clarified that this was only payments through July 2nd,
25 2021.

1 Stigma-Free International Inc. received nearly
2 \$6 million and then transferred almost half of that to
3 Tunyar Trading and half of it to Horseed Management LLC.

4 Q. And can you remind us, Ms. Jansma, Tunyar Trading and
5 Horseed Management, what are their connections to the
6 Federal Child Nutrition Program?

7 A. They were supposedly vendors providing food.

8 Q. For which sites?

9 A. Well, they've got the Willmar, Stigma-Free, Willmar site
10 and Stigma-Free I believe it was Mankato site.

11 Q. Okay. Tunyar Trading was Stigma-Free, Willmar and
12 Horseed was Stigma-Free, Mankato; is that right?

13 A. Yes.

14 Q. Okay. So the funds flowed from Feeding Our Future
15 through Stigma-Free International, the nonprofit, to Tunyar
16 Trading and Horseed Management?

17 A. Yes.

18 Q. And then from there, where did it flow with respect to
19 the purchase of this property?

20 A. Well, most of the money flowed over to the Salim Limited
21 bank account. Some of the Tunyar money was transferred to
22 Olive Management, but then Olive Management also transferred
23 money to Salim Limited LLC during the same time period.

24 Q. Now these transactions, money is moving from one account
25 to another. We're not going to go through it check by check

1 because I think the jury's had enough of that for this
2 trial.

3 But can you describe the nature of the checks when
4 you saw the transactions between these various entities?

5 A. They were all large dollar amounts that were rounded to
6 the, you know, zero.

7 Q. As a forensic accountant with 25 years of public
8 accounting experience, was that significant to you? Did it
9 catch your eye?

10 A. Oh, absolutely.

11 Q. How so?

12 A. That's not something that you would typically see in a
13 business that's purchasing goods. That's just not normal.

14 Q. What do you normally see if you saw a business that was
15 in, you know, a nonprofit running after-school programs or a
16 vending company that provided food or meals?

17 A. Well, you would see dollar amounts that matched invoices
18 for the purchase of goods, and typically you would see those
19 payments for food going out the same day or within a few
20 days of the invoice.

21 And each invoice would need to be paid in full,
22 likely, before the supplier would bring you another
23 shipment.

24 Q. And what about the size of the invoices? The size of
25 the checks that you see, were they what you would expect to

1 see as a public accountant?

2 A. No.

3 Q. Why not?

4 A. They were just really large, and they didn't make sense.

5 Q. Why didn't they make sense to you?

6 A. Because it just -- well, when you see the food purchases
7 and you know what meals are being served, and during that
8 time frame the challenging times, sourcing goods, you know,
9 the variety of different vendors that you would need to go
10 to, it would just make sense that you would have more
11 smaller transactions, instead of big, large transactions to
12 newly-formed entities.

13 Q. And of course, you looked into Tunyar Trading and
14 Horseed Management, correct?

15 A. Yes, we looked at those accounts.

16 Q. To determine whether or not they were actually food
17 vendors companies?

18 A. Right, yeah.

19 Q. And what did you find?

20 A. That they were newly formed entities, and they didn't
21 buy food.

22 Q. Did they have a warehouse?

23 A. No.

24 Q. Did they have an office?

25 A. No.

1 Q. Okay. All right. Let's keep going then.

2 We see, we talked earlier about the \$500,000 that
3 was deposited directly from Feeding Our Future to Defendant
4 Salim Said's Limited account; is that right?

5 A. Yes.

6 Q. Where did that money come from?

7 A. That was two payments. One was for 200,000, and the
8 other was \$300,000, and that was payments for two months'
9 worth of claims.

10 Q. For which site?

11 A. For the Safari Restaurant site.

12 Q. Okay. And then to the right of that, we see Brava
13 Restaurant and Cafe. Are you familiar with that entity?

14 A. Yes.

15 Q. I think the jury heard from one of the owners of that
16 restaurant; is that right?

17 A. Yes.

18 Q. Sharmake Jama?

19 A. Yeah.

20 Q. Could you tell us about the money that flowed from
21 Feeding Our Future to Brava Restaurant and then on to Salim
22 Limited?

23 A. Yeah. So Brava Restaurant and Cafe created a food site,
24 and they worked directly with Cosmopolitan, Safari
25 Restaurant and Salim Said. So they were receiving food

1 money for serving food and then just passing some of that
2 along to Salim Limited account.

3 Q. You say, "For serving food." That's what they were
4 ostensibly receiving the money for; is that right?

5 A. That's what they were claiming, yes.

6 Q. Is that what you saw when you looked at the bank
7 records?

8 A. Yeah.

9 Q. Okay. Then ASA Limited, remind us what that company is?

10 A. ASA Limited is an entity created with Salim Said and two
11 of his coconspirators. He's the "S" in the ASA.

12 Q. Okay. And was it involved in the Federal Child
13 Nutrition Program?

14 A. Yes, it was.

15 Q. How so?

16 A. It was a site.

17 Q. Okay. And the \$4 million that ASA Limited received from
18 Feeding Our Future --

19 A. Yep.

20 Q. -- was that all Federal Child Nutrition Program funds?

21 A. Yes, it was.

22 Q. Purportedly for meals served at the ASA Limited site?

23 A. Correct.

24 Q. Okay. And presumably that money would have been used to
25 buy food, but it looks like a chunk of it here was spent on

1 other things?

2 Can you talk about what's shown on the chart?

3 A. Yes. 790,000 of the funds were then directly
4 transferred to the Salim Limited LLC bank account, and
5 \$903,700 was then transferred to AG Limited LLC.

6 Q. Ahmed Ghedi's company?

7 A. Correct.

8 Q. Is he one of the other "As" in ASA Limited?

9 A. Correct.

10 Q. And then we talked about Safari Restaurant before, but
11 just to close the loop on this chart.

12 A. Yeah. So Safari Restaurant received through July 2nd of
13 2021, \$9.6 million from Feeding Our Future, and of that
14 money, \$1.8 million was transferred to Salim Limited LLC,
15 and another basically \$1.8 million was transferred to 3017
16 LLC.

17 Q. Okay. And ultimately all that money flowed into that
18 Cosmopolitan Business Properties account?

19 A. Yes.

20 Q. Where 100 percent of the funds were used to do what?

21 A. To purchase the property on Park Avenue.

22 Q. So ultimately bottom line, what percentage of the funds
23 that were used to purchase this property for \$2.7 million
24 came from the Federal Child Nutrition Program?

25 A. 100 percent.

1 Q. How many meals is that?

2 A. It's about 800,000 meals.

3 Q. That apparently weren't purchased, just used to buy the
4 property?

5 A. Correct.

6 Q. Okay. Now this 2722 Park Avenue property had other
7 significance to the case; is that right?

8 A. Yes.

9 Q. How so?

10 A. The offices were there for the Abdulkadir Nur Salah's
11 office space where he was running the Total Financial
12 Solutions, and they also had what they called the Safari
13 room in this building where they would have their meetings.

14 Q. When you say "they," who had the meetings in the Safari
15 room at 2722 Park Avenue.

16 A. Salim Said and his coconspirators.

17 MR. MONTEZ: Objection. Lack of foundation.

18 THE COURT: Sustained.

19 MR. THOMPSON: Okay.

20 THE COURT: The jury will disregard.

21 BY MR. THOMPSON:

22 Q. Well, let's look at what was found. This building was
23 actually searched, is that right, during the investigation?

24 A. Yes, it was.

25 Q. And when was it searched?

1 A. January 20th of 2022.

2 Q. And did agents find things related to the case?

3 A. Yes, they did.

4 Q. Generally what kind of things?

5 A. Documents.

6 Q. Okay. What kind of documents?

7 A. Meal counts, rosters with names on them, invoices that
8 were for food.

9 Q. Okay. Let me show you some of those documents that have
10 been admitted into evidence. I'm showing you now Government
11 Exhibit FF8, which is a stack of meal counts that were
12 recovered during the search of 2722 Park Avenue; is that
13 right?

14 A. Yes.

15 Q. What are these meal counts for, which site?

16 A. ASA Limited.

17 Q. Whose entity is ASA Limited?

18 A. That is Salim Said and two of his coconspirators.

19 Q. Okay. And the meal counts, what do they say?

20 A. They served basically 2,000 meals every day, breakfast
21 and lunch.

22 Q. And what's the, what's the week on these meal counts
23 here at Government Exhibit FF8?

24 A. This is the week of June 20th of 2021.

25 Q. If I remember correctly, that's the same week they

1 opened Cosmopolitan Business Properties?

2 A. Yes.

3 Q. Government Exhibit FF9, another stack; is that right?

4 A. Yes.

5 Q. What do we see here?

6 A. More meal counts for ASA Limited, about 3,000 meals a
7 day.

8 Q. I think we looked on that chart. We saw money coming
9 from Olive Management; is that right?

10 A. Yes.

11 Q. Showing you now what's been admitted as Government
12 Exhibit FF24, a folder of documents that was recovered
13 during the search of 2722 Park.

14 And what do we see in this folder?

15 A. This is also meal counts for the site Olive Management
16 in St. Cloud, serving basically 2,000 snacks and suppers
17 every day.

18 Q. Okay. I think Brava Cafe was on that chart; is that
19 right?

20 A. Brava Restaurant.

21 Q. Brava Restaurant here?

22 Showing you what's been admitted as Government
23 Exhibit FF30, which is a folder of documents recovered
24 during the search of 2722 Park. What do we see here,
25 looking at page 4?

1 A. These are claims for meal counts of roughly 2,000 meals,
2 it's not marked if it's breakfast or lunch, for Brava
3 Restaurant, Rochester.

4 Q. Who signed this one?

5 A. It's Sharmake Jama.

6 Q. And he testified earlier in this trial?

7 A. Yes.

8 Q. We talked about Tunyar Trading was on that chart,
9 correct?

10 A. Correct.

11 Q. Provided money to purchase this property for
12 \$2.7 million?

13 A. Yes.

14 Q. Showing you now Government Exhibit FF22, which is a
15 folder of documents recovered during the search of that
16 property on January 20th, 2022.

17 And what do we see here?

18 A. Meal counts for 2,000 meals, suppers and snacks, at the
19 Stigma-Free, Willmar site.

20 Q. FF16 is a folder of documents titled Stigma that was
21 recovered during the search of 2722 Park. What do we see
22 here?

23 A. Meal counts, again 3,000 meals a day. This one is
24 marked as lunch meals, and it's for the Stigma-Free, Mankato
25 site.

1 Q. And that was related to that business entity Horseed
2 Management; is that right?

3 A. Yes.

4 Q. One of the entities that provided the funds used to
5 purchase 2722 Park Avenue by Salim Said and others; is that
6 right?

7 A. Correct.

8 Q. And Government Exhibit 17, a folder marked Horseed, also
9 recovered during the search of that property; is that right?

10 A. Correct.

11 Q. Then what do we see here?

12 A. This is also meal counts, serving roughly 3,000
13 breakfasts every day. This is for Stigma-Free, Mankato.

14 Q. Okay. All right. So this property that was searched on
15 January 20th, 2022. Ultimately what's happened to that
16 property?

17 A. We've put a lien against it and seized it so we can
18 recoup the money.

19 Q. Why? Why would you recoup the money?

20 A. Because it was acquired with funds that were
21 inappropriately taken from the Federal Child Nutrition
22 Program.

23 Q. Okay. All right. We have one more 1957 count to walk
24 through; is that right?

25 A. That is correct.

1 Q. And that is, I'll throw it up on the screen first.

2 I'm going to show you what's been marked, but not
3 yet admitted, as Government Exhibit U10. Do you recognize
4 this photo?

5 A. I do.

6 Q. What's it a photo of?

7 A. This is a commercial property that was used as a
8 culinary school, located in Columbus, Ohio.

9 MR. THOMPSON: And, Your Honor, I move to admit
10 Government Exhibit U10.

11 THE COURT: Any objection?

12 MR. UDOIBOK: No, no objection.

13 MR. MONTEZ: No objection.

14 THE COURT: U10 is admitted.

15 BY MR. THOMPSON:

16 Q. All right. Ms. Jansma, now that we're looking at the
17 photo, can you describe what we're looking at?

18 A. This is a picture of the property when it was being used
19 as a culinary school.

20 Q. Okay. And why are we looking at a picture of it here?

21 A. Because the child nutrition program funds were
22 ultimately used to acquire this property as well.

23 Q. And it was, when they purchased it -- well, first off
24 who purchased it?

25 A. It was Salim Said, Abdulkadir Salah, and Abdirahman

1 Ahmed.

2 Q. Okay. When they purchased it, was it active as a
3 culinary school, the Columbus Culinary Institute?

4 A. I'm not sure about that.

5 Q. All right. Did you look into this transaction?

6 A. Yes.

7 Q. Why did it catch your eye? Why were you looking into
8 it?

9 A. Because it was a large amount of money that was being
10 transferred over to make this purchase.

11 Q. And what were you looking for when you looked at it?

12 A. We were looking for the use of the funds and then the
13 source of the funds so we could determine if they were
14 legitimate or not.

15 Q. Okay. Were they?

16 A. No.

17 Q. Okay. I'm going to show you what's been admitted but
18 not -- I'm sorry -- what's been marked, but not yet
19 admitted, as Government Exhibit U9. I'd like to walk you
20 through this transaction, if you don't mind.

21 A. Okay.

22 Q. Government Exhibit U9, what is this?

23 A. This is the closing statement for the property in Ohio.

24 Q. Okay.

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

1 Government Exhibit U9.

2 THE COURT: Any objection?

3 MR. UDOIBOK: No objection.

4 MR. MONTEZ: No objection.

5 THE COURT: U9 is admitted.

6 BY MR. THOMPSON:

7 Q. All right. Ms. Jansma, I'm going to direct your
8 attention to the top of the page here. It's a closing
9 statement again; is that right?

10 A. Yes.

11 Q. And remind us again. What's a closing statement?

12 A. It is the reconciliation document used when you are
13 acquiring property.

14 Q. Okay. And the property that's being acquired here, what
15 do we got?

16 A. 2435 Stelzer Road in Columbus, Ohio.

17 Q. Okay. That's the property we just looked at?

18 A. Yes.

19 Q. Okay. And what's the date of this transaction?

20 A. August 30th of 2021.

21 Q. So about six weeks after the purchase of 2722 Park
22 Avenue?

23 A. Yeah, correct.

24 Q. What's the purchase price of this property?

25 A. \$2.6 million.

1 Q. And who is buying it?

2 A. Afrikan Village LLC.

3 Q. Now during your investigation did you look into this
4 entity Afrikan Village LLC?

5 A. Yes, we did.

6 Q. I'm going to show you what's been marked as Government
7 Exhibit T32, not yet in evidence.

8 Is this the Secretary of State filing for Afrikan
9 Village LLC?

10 A. Yes, this is.

11 MR. THOMPSON: Your Honor, I move to admit
12 Government Exhibit T32.

13 MR. UDOIBOK: No objection.

14 MR. MONTEZ: No objection.

15 THE COURT: T32 is admitted.

16 BY MR. THOMPSON:

17 Q. All right. Ms. Jansma, what are we looking at here?
18 We've looked at lots of Minnesota Secretary of State
19 filings, but this one is a little different; is that right?

20 A. Yeah.

21 Q. Could you explain?

22 A. This is a Secretary of State for Ohio.

23 Q. And the entity that we're looking at is Afrikan Village
24 LLC?

25 A. Correct.

1 Q. The one used to purchase that property?

2 A. Yes.

3 Q. And on what date was this entity created in Ohio?

4 A. May 18th of 2021.

5 Q. A couple months earlier?

6 A. Mm-hmm.

7 Q. Okay. And I'm directing your attention to page 3 of
8 this exhibit. We have the name of the company again,
9 correct?

10 A. Yes.

11 Q. The purpose of the company, "Connecting community to
12 economic promise"?

13 A. That's what it says.

14 Q. And who created this company? Who registered it the
15 Secretary of State?

16 A. Abdirahman Ahmed.

17 Q. Who is Abdirahman Ahmed?

18 A. He is one of the owners of Safari Restaurant.

19 Q. Who are his partners in that business?

20 A. Salim Said and Abdulkadir Nur Salah.

21 Q. After Mr. Ahmed created Afrikan Village LLC, was there a
22 bank account opened in its name?

23 A. Yes.

24 Q. And steps taken to purchase a property using it?

25 A. Correct.

1 Q. Okay. I'm going to show you now Government Exhibit W81,
2 which is the bank account opened in the name of Afrikan
3 Village.

4 This is a Bank of America account; is that right?

5 A. Yes.

6 Q. Opened in the name of Afrikan Village?

7 A. Correct.

8 Q. And directing your attention to the bottom of page 1.

9 Who opened this account and when?

10 A. Abdirahman Ahmed on June 18th, 2021.

11 Q. And directing your attention to page 2, were there
12 additional signers added to the account about twelve days
13 later on June 30th, 2021?

14 A. Yes.

15 Q. Who were the additional signers added to this Afrikan
16 Village LLC account?

17 A. Abdulkadir Nur Salah and Salim Ahmed Said.

18 Q. Defendant in this case?

19 A. Correct.

20 Q. Okay. Did you look at what happened in the account?

21 A. We did.

22 Q. I guess we'll turn to the next page. It's a busy
23 account on month one.

24 Page 3 is the first month of the account statement
25 for the 12 days of June 18th to June 30th, 2021; is that

1 right?

2 A. Yes.

3 Q. What happens over that 12-day period?

4 A. There were deposits.

5 Q. How much was deposited into the account in that first
6 twelve days?

7 A. \$1,683,532.67.

8 Q. And deposited in two big chunks; is that correct?

9 A. Yes.

10 Q. 866,000 and then 816,000?

11 A. Correct.

12 Q. And in July there was another 866,000 deposited into the
13 account; is that right?

14 A. Yes.

15 Q. July 6th?

16 A. Correct.

17 Q. All right. Let's look at where that money came from.

18 All right. First we're looking at page 105.

19 There's a check deposited into the account; is that right?

20 A. Yes.

21 Q. Could you talk to us about this check?

22 A. This check is from 3017 LLC for \$866,666.

23 Q. And whose entity is 3017 LLC?

24 A. Abdulkadir Nur Salah.

25 Q. And what's the date on this check?

1 A. June 21st, 2021.

2 Q. And what's the address listed on this check?

3 A. The --

4 Q. For Afrikan Village?

5 A. Oh. 2435 Stelzer Road in Columbus, Ohio.

6 Q. Okay. And two pages later, there's another check
7 written to Afrikan Village, dated July 1st, 2021; is that
8 right?

9 A. That is correct.

10 Q. Same amount, \$866,000?

11 A. Correct.

12 Q. Who is this check from?

13 A. Salim Limited LLC.

14 Q. And whose entity is that?

15 A. Salim Said.

16 Q. And then on page 102 and 103, there's two other checks
17 deposited into the account on June 23rd, 2021; is that
18 right?

19 A. That's correct.

20 Q. \$316,000 cashier's check on June 23rd and a \$500,000
21 cashier's check that date; is that right?

22 A. Correct.

23 Q. And who, do you recall who deposited those checks?

24 A. Those are from Abdirahman Ahmed's account, his personal
25 account.

1 Q. Okay. Ms. Jansma, did you do an analysis of the funds
2 used to purchase this culinary institute in Columbus, Ohio,
3 for \$2.6 million?

4 A. Yes, I did.

5 Q. What were you looking for?

6 A. Looking for the sources of the funds.

7 Q. Okay. What did you find?

8 A. That they were all funds from the child nutrition
9 program.

10 Q. Did you do a nifty chart showing your analysis?

11 A. Yes.

12 Q. Has that been marked as Government Exhibit U9, which is
13 not yet in evidence? Nope. U20?

14 Is that it?

15 A. That's the one, yes.

16 Q. Did you create it using the same methods as you did your
17 other charts that we looked at?

18 A. I did.

19 MR. THOMPSON: Your Honor, I move to admit
20 Government Exhibit U20.

21 MR. UDOIBOK: No objection.

22 MR. MONTEZ: No objection.

23 THE COURT: U20 is admitted.

24 BY MR. THOMPSON:

25 Q. Okay. All right. Ms. Jansma, do you want to start at

1 the bottom or the top? Your chart.

2 A. We can start at the bottom again.

3 Q. Okay. So what do we see at the bottom of this chart?

4 A. A photograph of the property, and the closing entity was
5 at Stewart Title. The closing date was August 30th of 2021.

6 Q. And the money that was used to purchase it here?

7 A. The money came from Afrikan Village LLC bank account.

8 Q. How much was sent from Afrikan Village LLC to Stewart
9 Title to purchase this property in Columbus, Ohio?

10 A. \$2,471,112.

11 Q. And you traced the ultimate source of those funds that
12 were deposited into Afrikan Village for use in purchasing
13 these properties?

14 A. Yes.

15 Q. And what did you find?

16 A. Well, we found that it was all sourced by the child
17 nutrition program. It was basically a third from each
18 owner. They all pitched in the same amount, 3017 LLC, Salim
19 Limited LLC and then Abdirahman Ahmed who is, his money was
20 in a couple of different accounts, but he put the \$500,000
21 down, took 500,000 out of his personal account and 316,666
22 out of his Afra Grill LLC bank account.

23 Q. Now we've talked at some length, both you and your
24 colleagues, about the 3017 LLC bank accounts and the Salim
25 Limited LLC bank account.

1 Bottom line, all the funds that were into and out
2 of those accounts, where did they come from?

3 A. From the Federal Child Nutrition Program via Feeding Our
4 Future.

5 Q. Okay. Now Afra Grill, their partner Abdirahman Ahmed,
6 you said his came from multiple sources; is that right?

7 A. Well --

8 (Phone rings)

9 THE COURT: I'm going to hold for a minute. I
10 think it rang in the pouch. So let's go out, and you will
11 go out and take care of that. Thank you.

12 All right. We can go back. Thank you.

13 THE WITNESS: The money from Abdirahman Ahmed came
14 via his Afra Grill LLC account, which was money that was
15 ultimately from Cosmopolitan.

16 BY MR. THOMPSON:

17 Q. Okay. And we'll look at the top of your chart. It
18 shows that flow of money; is that right?

19 A. Yes.

20 Q. How much did Abdirahman Ahmed receive from either
21 Feeding Our Future or Safari Restaurant?

22 A. A little over \$2 million.

23 Q. Okay. And all of that was Federal Child Nutrition
24 Program funds?

25 A. Yes, it was.

1 Q. As indicated on your chart?

2 A. Yes.

3 Q. Okay. Now this property -- so bottom line, all the
4 money that came -- was used to purchase this property?

5 A. Yes, all of it.

6 Q. From Federal Child Nutrition Program?

7 A. Yes.

8 Q. And this property, is there any, did anything happen
9 with it with respect to the investigation?

10 A. Yes, we also filed paperwork to seize the property to
11 reclaim the funds.

12 Q. I guess, Ms. Jansma, just to show our work here --

13 Is X14 in evidence? Yes.

14 I'm going to show you Government Exhibit X14. And
15 is this a sources and uses chart showing the funds that
16 flowed into and out of Abdirahman Ahmed's Afra Grill
17 account?

18 A. Yes.

19 Q. That was the one that provided funds for use in
20 purchasing that property along with Defendant Salim Said and
21 Abdikadir Salah?

22 A. Yes.

23 Q. And what do we see here in terms of the funds that were
24 deposited into this account over about a year-long period
25 from September 2020 through October 2021?

1 A. The primary source of the funds were from Cosmopolitan
2 Business Solutions, Tunyar Trading and Feeding Our Future.

3 Q. What percentage of funds deposited into that account
4 were Federal Child Nutrition Program funds?

5 A. Just over 80 percent.

6 Q. And the funds used to purchase this property, they were
7 traceable to those food program funds?

8 A. Yes.

9 Q. Okay. That transaction is charged in Count 57 of the
10 indictment; is that right?

11 A. Yes.

12 Q. Okay. All right. Ms. Jansma, I want to switch gears
13 here for a second.

14 We talked at some length about the companies, the
15 entities, that Defendant Said and the other individuals
16 involved in the Safari group created and used to receive the
17 proceeds of the fraud scheme; is that right?

18 A. Yes.

19 Q. Let's talk about Ms. Bock.

20 Did she have a company that she used to receive
21 money from Feeding Our Future?

22 A. Yes, she did.

23 Q. And what was that entity called?

24 A. It was called Handy Helpers.

25 Q. What is Handy Helpers?

1 A. Handy Helpers is an entity that was created as a,
2 through her boyfriend, Empress Malcolm Watson, as a way to
3 pay money out of Feeding Our Future and disguising it as
4 payments for services for a handyman.

5 Q. Okay. So you talked about Handy Helpers. It was
6 created by a guy named Empress Watson?

7 A. Yes.

8 Q. Who is Empress Watson?

9 A. Aimee Bock's live-in boyfriend at the time.

10 Q. They lived together?

11 A. Yes.

12 Q. Partners?

13 A. Mm-hmm.

14 Q. Okay. I want to show you, walk you through some
15 documents about this company. Okay?

16 A. Okay.

17 Q. Including starting with the basics, its registration and
18 creation. Okay?

19 A. Sounds good.

20 Q. I'm going to show you what's been marked, but not yet
21 admitted, as Government Exhibit S40. And are these, is this
22 the Secretary of State filing for Handy Helpers?

23 A. Yes, it is.

24 MR. THOMPSON: Your Honor, I move to admit
25 Government Exhibit S40.

1 THE COURT: Any objection?

2 MR. UDOIBOK: No objection.

3 MR. MONTEZ: No objection.

4 THE COURT: Exhibit 40 is admitted, S40.

5 BY MR. THOMPSON:

6 Q. All right. Ms. Jansma, I'm showing you now on page 4
7 the Articles of Organization for this entity Handy Helpers;
8 is that right?

9 A. Yes.

10 Q. And who created it here?

11 A. Empress Watson --

12 Q. Okay. When did he create it?

13 A. -- Junior. November 18th, 2019.

14 Q. Okay. Did this entity have a bank account?

15 A. Not at that time.

16 Q. Did it eventually have a bank account?

17 A. Yes.

18 Q. And did you look at that bank account during your
19 investigation?

20 A. Yes.

21 Q. That bank account's been admitted as Government
22 Exhibit W46; is that right?

23 A. Yes.

24 Q. Okay. And I'm showing you now the first page of that
25 exhibit, which is the account opening application; is that

1 right?

2 A. Correct.

3 Q. First off, down here at the bottom the customer name for
4 this bank account?

5 A. Handy Helpers LLC.

6 Q. And then the name, the individual name on the account?

7 A. Empress M. Watson, Jr.

8 Q. He's a signatory on the account?

9 A. That's correct.

10 Q. When was this account opened?

11 A. March 12th of 2020.

12 Q. And at the bottom here there's an address listed for the
13 account; is that right?

14 A. That is correct.

15 Q. What's the address listed on the account?

16 A. 13299 Bronze Parkway in Rosemount.

17 Q. Are you familiar, are you familiar with that address?

18 A. Yes.

19 Q. How so?

20 A. That is Aimee Bock's residence at the time.

21 Q. Okay. The opening deposit into the account was how
22 much?

23 A. \$25.

24 Q. Okay. All right. I'd like to walk through a little bit
25 of this account. Okay?

1 First I'm directing your attention to page 5.

2 What do we got here?

3 A. This is the initial account statement dated March 31st
4 of 2020.

5 Q. The address on the account again, that's Ms. Bock's
6 residence?

7 A. Yes.

8 Q. Okay. And what happened that first month?

9 A. There was \$7,025 deposited into the account. \$4,265.50
10 was removed from the account.

11 Q. Okay. Directing your attention to page 6, can we look
12 at where that money came from that was deposited into the
13 account right away?

14 A. Yes. So there was \$25 deposited and then 500
15 transferred from Feeding Our Future and then \$3,000
16 transferred from Feeding Our Future.

17 Q. And that's in the first eight days after the account was
18 opened?

19 A. Correct.

20 Q. And just looking after those first three entries, after
21 that deposit of 3500 from Feeding Our Future, what account
22 activity do you see over the next couple days?

23 A. There were two cash withdrawals at an ATM, \$300 each,
24 and then a transfer to Empress Watson's personal account for
25 \$1400 and then another cash withdrawal at an ATM for \$163.

1 Q. All right. Moving on, I see a couple more cash, ATM
2 withdrawals, is that right, and then a couple days later?

3 A. Yep, correct.

4 Q. Okay. And then on March 27th is there another deposit
5 into the account?

6 A. Yes. There's a \$3,500 deposit from Feeding Our Future.

7 Q. And what happens to that money?

8 A. \$300 is withdrawn at an ATM, and then \$1,400 is
9 transferred to Empress Watson's personal checking account.

10 Q. Now, I'm directing your attention to page 8, and that's
11 the following month's statement; is that right?

12 A. Yes.

13 Q. April 2020? What do we see starting on April 3rd of
14 2020?

15 A. A \$3,000 deposit from Feeding Our Future, a 1200 cash
16 withdrawal at a bank, and then \$1,400 transferred to Empress
17 Watson's personal checking account, and another deposit
18 following that from Feeding Our Future for \$3,000.

19 Q. On April 13th?

20 A. Yep.

21 Q. And how was that money used?

22 A. There was \$1,400 again transferred to Empress Watson's
23 personal account, \$410 transferred to Empress's account
24 called Above All Classic Muscle Cars LLC, and then \$300 in
25 four transactions of transfers to Empress Watson's personal

1 account.

2 Q. Would you characterize these as business expenses or
3 personal?

4 A. No, there's no indication of any kind of supplies or any
5 purchases that would be related to a handyman service.

6 Q. And that's ostensibly what this company was; is that
7 right?

8 A. Yes.

9 Q. Okay. You said you mentioned a transfer to an entity
10 called Above All Classic Muscle Cars LLC. Is that; is that
11 right?

12 A. Yes.

13 Q. Whose entity was that?

14 A. Empress Watson.

15 Q. Now, Ms. Jansma, you said, you described this as a
16 handyman company. And in fact, if I remember correctly, the
17 account opening documents actually say that.

18 What's the description that Mr. Watson put of the
19 business on this account opening statement?

20 A. Handyman.

21 Q. All right. Let's go to page 8. That's the --

22 Let's go to, page 13 is the May 2020 account
23 statement, the third month of this account's creation; is
24 that right?

25 A. Yep.

1 Q. And what do we see in terms of the activity in the
2 account come May?

3 A. There is cash withdrawals, another \$3,000 transfer from
4 Feeding Our Future and more transfers to Empress Watson's
5 personal account and transfers to his other entity Above All
6 Classic Muscle Cars.

7 Q. Sensing a pattern here; is that right?

8 A. Yes.

9 Q. Does that pattern continue on May 8th?

10 A. Yes, it does.

11 Q. What do we see?

12 A. \$3,500 from Feeding Our Future and then 2,000 to Empress
13 Watson's personal account, 230 to his other LLC, Above All
14 Classic Muscle Cars. And then three transfers in a row to
15 Empress Watson's personal account, and \$320 again to the
16 Above All Classic Muscle Cars bank account.

17 Q. Okay. Let's skip ahead to June. I think we have a
18 similar pattern; is that right?

19 A. Yes.

20 Q. Only the amount of money goes up; is that right?

21 A. It does.

22 Q. How much was deposited or transferred from Feeding Our
23 Future to Handy Helpers on July 2nd?

24 A. \$7,000.

25 Q. Okay. What happened the next day?

1 A. \$2,510 was withdrawn at a branch.

2 Q. Okay. And we see similar deposits throughout that
3 month, correct?

4 A. Correct.

5 Q. Ms. Jansma, did you and your colleagues create a chart
6 showing all the money that was deposited into and out of
7 this Ms. Watson's boyfriend's entity's bank account?

8 A. Yes.

9 Q. Has that been admitted as Government Exhibit X24?

10 A. I presume, yes.

11 Q. I'll show you. Is that it?

12 A. Yes, that is it.

13 Q. All right. Explain to us again. I know Ms. Roase was
14 primarily discussing these types of charts, but can you
15 remind the jury what we're looking at?

16 A. This is a chart that reflects all of the deposits into
17 the bank account and then all of the uses of those funds.

18 Q. Okay. And generally what do we see in terms of the
19 money that was deposited into the Handy Helpers account from
20 its creation in March 2020 through January 20th, 2022, which
21 is the day of the search warrants, correct?

22 A. That's correct. Yes, nearly all of the money came from
23 Feeding Our Future.

24 Q. \$878,000 was deposited into the account in that --

25 A. Yes.

1 Q. -- 20-month period, correct?

2 A. That is correct.

3 Q. There's also an \$11,000 deposit from an entity called
4 Sharing and Caring Child Care LLC.

5 A. Yes.

6 Q. Are you familiar with that entity?

7 A. A little bit.

8 Q. How so?

9 A. There was also a site that was providing food under the
10 Feeding Our Future sponsorship.

11 Q. Whose company was Sharing and Caring Child Care LLC?

12 A. I don't recall right now. Sorry.

13 Q. All right. Did you look at how the money was spent?

14 This was a handyman company; is that right?

15 A. Yes.

16 Q. What did you see?

17 A. Predominantly cash withdrawals and transfers to
18 Empress's personal account and his other business.

19 Q. Okay. How much, of that \$900,000 deposited into the
20 account, how much of it was withdrawn in cash?

21 A. \$212,000.

22 Q. And how much was transferred to one of Mr. Watson's
23 other accounts?

24 A. \$169,000.

25 Q. There's also a considerable amount of shopping done out

1 of this account; is that right?

2 A. Yep.

3 Q. Could you describe it just generally based on what we
4 see in this chart here?

5 A. Yes. He shopped at the jewelry stores. He went do
6 sporting goods stores. He bought a lot of shoes.

7 Q. Okay. And when you say "who," who were you referring
8 to?

9 A. Empress Watson's.

10 Q. Ms. Bock's live-in boyfriend?

11 A. Correct.

12 Q. Okay. Now Ms. Bock, she had some involvement in this
13 entity; is that right?

14 A. Yes, she did.

15 Q. I want to show you a couple of exhibits that are not yet
16 in evidence. First I'm going to show you Government
17 Exhibit S46 and then S47.

18 And are these both documents from ADP addressed to
19 Handy Helpers LLC?

20 A. Yes, they are.

21 Q. And who is the person listed on this one?

22 A. Aimee Bock.

23 MR. THOMPSON: Your Honor, I move to admit
24 Government Exhibit S46 and S47.

25 MR. UDOIBOK: No objection.

1 MR. MONTEZ: No objection.

2 THE COURT: S46 and S47 are admitted.

3 BY MR. THOMPSON:

4 Q. And, Ms. Jansma, I'll show you here Government Exhibit
5 S47, and it's a letter from ADP; is that right?

6 A. Yes.

7 Q. Tax filing service?

8 A. Yep. Well, yes.

9 Q. And who is listed as the contact for Handy Helpers LLC?

10 A. Aimee Bock.

11 Q. Do you recognize the address listed for Handy Helpers
12 LLC and Aimee Bock?

13 A. Yes, I do.

14 Q. What address is that?

15 A. It's Aimee Bock's house at the time.

16 Q. We looked at that chart, X24. There was nearly \$900,000
17 deposited into the account from Feeding Our Future; is that
18 right?

19 A. Yes.

20 Q. And did you look during the investigation to who
21 transferred this money from Feeding Our Future to Ms. Bock's
22 boyfriend's entity?

23 A. Yes.

24 Q. Okay. Let's take a look. I'm going to show you
25 what's -- go back to Government W46, the bank account.

1 And specifically starting at page 157, we see here
2 a check deposited into the Handy Helpers account; is that
3 right?

4 A. Yes.

5 Q. And it's paid to the order of Handy Helpers?

6 A. Correct.

7 Q. What's the amount of the check for?

8 A. \$10,000.

9 Q. And what's the date?

10 A. January 15th, 2021.

11 Q. Who signed this check for \$10,000 from Feeding Our
12 Future to Handy Helpers?

13 A. Aimee Bock.

14 Q. How about Government Exhibit 161, what do we see?

15 A. Another check from Feeding Our Future to Handy Helpers.

16 Q. This is a week later, January 22nd, 2021?

17 A. Yes.

18 Q. What's the amount of the check for?

19 A. \$12,000.

20 Q. Who signed the check to Handy Helpers on January 22nd,
21 2021?

22 A. Aimee Bock.

23 Q. A week later on February 5th, 2021, there's another
24 check from Feeding Our Future to Handy Helpers?

25 A. Correct.

1 Q. And what's the amount of this check?

2 A. \$10,000.

3 Q. And who signed the check?

4 A. Aimee Bock.

5 Q. February 1st, 2021, there's another check to handy
6 helpers?

7 A. Correct.

8 Q. Who is it from?

9 A. Feeding Our Future.

10 Q. How much is the check?

11 A. \$15,000.

12 Q. Who signed it?

13 A. Aimee Bock.

14 Q. February 13th, 2021, another check from Feeding Our
15 Future to Handy Helpers?

16 A. Correct.

17 Q. How much is this check for?

18 A. \$10,000.

19 Q. Who signed it?

20 A. Aimee Bock.

21 Q. February 8th, this is a small one, 600 bucks.

22 February 19th, what do we see?

23 A. Another check from Feeding Our Future to Handy Helpers
24 for \$10,000, signed by Aimee Bock.

25 Q. They just continue, don't they?

1 A. Correct.

2 Q. March 5th, \$10,000?

3 A. Yep.

4 Q. From Feeding Our Future. Signed by Aimee Bock?

5 A. Yes.

6 Q. March 12th?

7 A. Yes.

8 Q. Another \$10,000? March 29th?

9 A. Correct.

10 Q. Okay. There's also a series of wire transfers from
11 Feeding Our Future to Handy Helpers; is that right?

12 A. That is correct.

13 Q. And those start at page 423 of Government Exhibit W46?

14 A. Yes.

15 Q. And wire transfers are a little more difficult to
16 understand if you don't send wires, but what are we looking
17 at here?

18 A. This is just a record of who sent and received the
19 wires. If you go to the third column over underneath where
20 it says Remitter, it says Feeding Our Future.

21 Q. Okay.

22 A. And the beneficiaries on the far right.

23 Q. Whoops. Got the wrong one.

24 Right here, who is the beneficiary of this wire
25 transfer from Feeding Our Future?

- 1 A. Handy Helper.
- 2 Q. Address is Ms. Bock's personal residence?
- 3 A. That's correct.
- 4 Q. This wire is January -- July 2nd, 2021; is that right?
- 5 A. That is correct.
- 6 Q. What's the amount of this wire transfer?
- 7 A. \$10,000.
- 8 Q. Go to the next page 424. We see another wire transfer
- 9 from Feeding Our Future to Handy Helpers?
- 10 A. Yes.
- 11 Q. On July 26th?
- 12 A. That's correct.
- 13 Q. What's the amount of this wire?
- 14 A. \$10,000.
- 15 Q. Four days later on July 30th, 2021, another wire
- 16 transfer from Feeding Our Future to Handy Helpers?
- 17 A. Correct.
- 18 Q. What's the amount of that wire?
- 19 A. \$10,000.
- 20 Q. About ten days later, August 9th, another \$10,000 wire
- 21 transfer from Feeding Our Future to Handy Helpers?
- 22 A. Correct.
- 23 Q. August 16th, a \$15,000 wire transfer?
- 24 A. That is correct.
- 25 Q. And I guess we could keep paging through, but it's going

1 to be the same; is that right?

2 A. That is correct.

3 Q. As we page through this exhibit. Okay.

4 Ms. Jansma, you found some records showing who
5 authorized these changes and who was aware of them; is that
6 right?

7 A. Yes.

8 Q. I'm going to show you what's been marked, but not yet
9 admitted, as Government Exhibit S43. And are these a series
10 of emails that were sent to Aimee Bock related to bank
11 transactions?

12 Do you see it?

13 A. Yes.

14 Q. Is that what it is?

15 A. Yes, they are from the Azlo account.

16 MR. THOMPSON: Okay. Your Honor, I move to admit
17 Government Exhibit S43.

18 THE COURT: Any objection?

19 MR. UDOIBOK: No objection.

20 MR. MONTEZ: No objection.

21 THE COURT: S43 is admitted.

22 BY MR. THOMPSON:

23 Q. Now, Ms. Jansma, again these are email notifications; is
24 that right?

25 A. That is correct.

1 Q. And they are from a company called Azlo, correct?

2 A. Yes.

3 Q. What's Azlo?

4 A. Basically an online bank account.

5 Q. Okay. And these emails, and there's a bunch of them
6 we'll walk through or at least we'll flip through, what do
7 they show?

8 A. This is a confirmation that there was a \$4,000 payment
9 that was initiated out of the Feeding Our Future account
10 that was held at Azlo bank account.

11 Q. Okay. And who is the transaction to?

12 A. Handy Helpers.

13 Q. And how much, what's the amount of the transaction?

14 A. \$4,000.

15 Q. And who was the notification to?

16 A. Aimee.

17 Q. Defendant Bock?

18 A. Yes.

19 Q. In fact, she's the sole signatory on the Feeding Our
20 Future accounts; is that right?

21 A. Yes, I believe so.

22 Q. And if we page through, every time there's money
23 transferred from Feeding Our Future to Handy Helpers,
24 Ms. Bock got an email notification, correct?

25 A. That's correct.

1 Q. Confirming that the payment was processed?

2 A. Yes.

3 Q. She also got emails related to the wire transfers; is
4 that correct?

5 A. Yes.

6 Q. I'm going to show you what's been marked, but not yet
7 admitted, as Government Exhibit S44. And are these a series
8 of notifications from Bank of America to Ms. Bock,
9 confirming the transfer of funds from Feeding Our Future to
10 Handy Helpers?

11 A. Yes.

12 MR. THOMPSON: Your Honor, I move to admit
13 Government Exhibit S44.

14 MR. UDOIBOK: No objection.

15 MR. MONTEZ: No objection.

16 THE COURT: S44 is admitted.

17 BY MR. THOMPSON:

18 Q. All right. Ms. Bock -- could you, now that it's on the
19 screen, could you describe this?

20 A. Yes. This is an email from Bank of America to Aimee at
21 Feeding Our Future, which is Aimee Bock. And it's a funds
22 transfer request that's been scheduled for September 24th,
23 2021.

24 Q. And what wire transfer is being, funds transfer is being
25 confirmed --

1 A. It's a --

2 Q. -- to Ms. Bock?

3 A. -- confirmation of a \$10,000 transfer to Handy Helper.

4 Q. Okay. And if we page through this exhibit, each page of
5 it, there's another confirmation email from Bank of America
6 informing Ms. Bock that her transfer of funds to Handy
7 Helpers was processed?

8 A. Correct.

9 Q. So, for example, on page 2, it's a \$10,000 transfer on
10 September 24th of 2021, correct?

11 A. Yes.

12 Q. And on page 3 it's a \$10,000 transfer on October 6,
13 2021?

14 A. Correct.

15 Q. Then page 6 another \$10,000, October 8th, two days
16 later?

17 A. Correct.

18 Q. And these, we page through this, go on and on, correct?

19 A. Yes.

20 Q. All right. So that \$900,000 that Ms. Bock, nearly
21 \$900,000 that she transferred to her boyfriend's company,
22 did you take a look at the spending, specifically, that was
23 done?

24 A. Yes.

25 Q. And I know you said there was a lot of retail spending;

1 is that right?

2 A. Yes.

3 Q. Did you take a look at that spending?

4 A. Yes, we did.

5 Q. Okay.

6 A. We requested records specifically for some of those
7 items.

8 Q. So, for example, on going back to Government Exhibit W46
9 at page 38, there's a Handy Helper statement from
10 September 30th of 2020; is that right?

11 A. Yes.

12 Q. And on here it shows a purchase at a Home Depot in Apple
13 Valley; is that right?

14 A. Yes, it does.

15 Q. What's the amount of the purchase?

16 A. \$2,564.73.

17 Q. Now, Ms. -- this was purportedly a handyman company; is
18 that right?

19 A. Yes.

20 Q. Did you look into that transaction to see whether or not
21 it was related to his handyman business?

22 A. Yes, we did.

23 Q. And what did you find?

24 A. We found that it was a payment for Aimee Bock's personal
25 residence for new carpet.

1 Q. I'm going to show you what's been marked, but not yet
2 admitted, as Government Exhibit S39. And is this a receipt
3 that was emailed to Ms. Bock from Feeding Our Future that
4 same day, September 1st, 2020?

5 A. Yes, it was an email from Home Depot to Aimee Bock,
6 confirming the order.

7 MR. THOMPSON: Your Honor, I move to admit
8 Government Exhibit S39.

9 MR. UDOIBOK: No objection.

10 MR. MONTEZ: No objection.

11 THE COURT: S39 is admitted.

12 BY MR. THOMPSON:

13 Q. And there's the email to Aimee at Feeding Our Future,
14 correct?

15 A. Yes.

16 Q. Customer order for Home Depot. And attached to the
17 email starting at page 2 of the exhibit is the actual
18 receipt; is that right?

19 A. Yes.

20 Q. From Home Depot?

21 A. Correct.

22 Q. And who is the person that, to whom this carpet was
23 sold?

24 A. Aimee Bock.

25 Q. And what's the address listed?

1 A. 13299 Bronze Parkway in Rosemount.

2 Q. Okay. And what was being purchased and installed here?

3 A. Carpeting.

4 Q. And on page 3, where was this carpet to be installed?

5 A. At 13299 Bronze Parkway in Rosemount.

6 Q. And on page 7 the amount of the charges for this carpet
7 installation at Ms. Bock's personal residence?

8 A. \$2,564.73.

9 Q. Paid for with?

10 A. With money out of the Handy Helpers account that came
11 from Feeding Our Future.

12 Q. Federal Child Nutrition Program funds?

13 A. Correct.

14 Q. Directing your attention back to Government Exhibit 46,
15 which is the, it's that September statement we were looking
16 at for the Handy Helpers account.

17 And a couple days later there was a transaction on
18 September 4th, 2020, at Wedding Day Diamonds in Roseville
19 Minnesota?

20 A. Correct.

21 Q. What was the amount of that transaction out of the Handy
22 Helpers account?

23 A. \$1,626.73.

24 Q. It looks like that was the same day that \$7,000 was
25 deposited into the account by Ms. Bock from Feeding Our

1 Future, correct?

2 A. That is correct.

3 Q. Did you look into that purchase at Wedding Day Diamonds?

4 A. Yes, we did.

5 Q. And have those records been marked, but not yet
6 admitted, as Government Exhibit S48?

7 A. Yep. Yes.

8 Q. Okay.

9 MR. THOMPSON: Your Honor, I move to admit
10 Government Exhibit S48.

11 THE COURT: Any objection?

12 MR. UDOIBOK: No objection.

13 MR. MONTEZ: No objection.

14 THE COURT: S48 is admitted.

15 BY MR. THOMPSON:

16 Q. Okay. Ms. Jansma, there's a receipt up on the screen
17 from Wedding Day Diamonds; is that right?

18 A. That is correct.

19 Q. And there's a series of invoices. Where did you receive
20 them?

21 A. These were subpoenaed from Wedding Day Diamonds where we
22 requested the records.

23 Q. And directing your attention to page 3, what do we see?

24 A. It's a receipt made out to Empress Watson at 13299
25 Bronze Parkway in Rosemount.

1 Q. And what's the receipt for?

2 A. A one carat total weight cluster. I don't know if
3 that's a ring or a bracelet. I'm not sure.

4 Q. Lab grown diamonds?

5 A. Yep.

6 Q. Okay. And there's a bunch of receipts in here for other
7 transactions at Wedding Day Diamonds; is that right?

8 A. That is correct.

9 Q. Including at page 5 for tennis bracelet, earrings and a
10 pendant?

11 A. And, yep, I believe earrings.

12 Q. Okay. All these purchases where were made using funds
13 from Handy Helpers?

14 A. Yes, they were.

15 Q. That came from Ms. Bock and Feeding Our Future?

16 A. That's correct.

17 Q. All right. There's also \$50,000 in travel expenses out
18 of the Handy Helpers account for that 20-month period in,
19 from March of 2020 to January of 2022; is that right?

20 A. That is correct.

21 Q. Did you look into that travel expense?

22 A. Yes, we did.

23 Q. Okay. What did you find?

24 A. We found trips to Vegas and some pretty fancy car
25 rentals.

1 Q. All right. Well, let's take a look. There we go. All
2 right.

3 Directing your attention back to Government
4 Exhibit W46, which is the Handy Helpers account, we see this
5 is the January 2021 account statement; is that right?

6 A. Yes, it is.

7 Q. And if I look here, I see starting in late January,
8 expenses in Las Vegas, Nevada; is that right?

9 A. That is correct.

10 Q. And those continue for a couple of pages here into
11 February, correct?

12 A. Yes.

13 Q. Okay. So first off I want to direct your attention to
14 January 28th, 2021, correct?

15 A. Yes.

16 Q. First off, did you look into who went to Las Vegas this
17 trip?

18 A. Yes, we did.

19 Q. Who went?

20 A. Empress Watson and Aimee Bock.

21 Q. And how did you confirm that the two of them went to Las
22 Vegas?

23 A. From flight records.

24 Q. Okay. The first purchase I want to highlight here, you
25 said there was something about fancy car rentals; is that

1 right?

2 A. Yes.

3 Q. This entry on January 28th, there's a 2,000 or \$2,200
4 charge to Royalty Exotic?

5 A. Yes.

6 Q. What's Royalty Exotic?

7 A. It's a car rental facility in Las Vegas, Nevada, that
8 rents really fun cars.

9 Q. Whether you say, "Really fun cars," what do you mean?

10 A. Fast and bright colored.

11 Q. Okay. All right. Let's take a look.

12 I'm going to move to admit, Your Honor, S51, which
13 is records obtained by subpoena from Royalty Exotic in Las
14 Vegas.

15 THE COURT: Any objection?

16 MR. UDOIBOK: No objection.

17 MR. MONTEZ: No objection.

18 THE COURT: All right. S51 is admitted.

19 MR. THOMPSON: Thank you, Your Honor.

20 BY MR. THOMPSON:

21 Q. I'm going to direct your attention here to page 22 of
22 these records where there's a receipt; is that right?

23 A. Yes.

24 Q. And what is the receipt, it's -- well first off, what's
25 the date on that receipt?

1 A. January 27th of 2021.

2 Q. So that's the expense we were looking at out of the
3 Handy Helpers account?

4 A. Yes, it is.

5 Q. And what's the amount charged to Royalty Exotic that
6 day?

7 A. \$2,297.

8 Q. Who made the charge?

9 A. Empress Watson.

10 Q. And what did he rent for \$2,200 that day in Las Vegas?

11 A. Bright green Lamborghini.

12 Q. Lamborghini Aventador?

13 A. Aventador.

14 Q. Okay. They were in Vegas for several days, correct,
15 Ms. Bock and Mr. Watson, her boyfriend?

16 A. Yes.

17 Q. And did they rent other cars those days?

18 A. Yes, they did.

19 Q. And this rental was \$2,200. How long did they rent this
20 Lamborghini for at the cost of \$2,200?

21 A. 24 hours.

22 Q. And directing your attention to page 27, there's another
23 rental that -- at that same Royalty Exotic car dealer, car
24 rental place; is that right?

25 A. Yes.

1 Q. What's the date on this rental?

2 A. January 28th of 2021.

3 Q. Okay. And what did Mr. Watson and Ms. Bock rent that
4 day?

5 A. A black Lamborghini --

6 Q. Okay.

7 A. -- Urus.

8 Q. And how much did they pay to rent it for that 24-hour
9 period?

10 A. \$1,800.

11 Q. What account did they use to rent that car?

12 A. Handy Helpers.

13 Q. Where did the funds come from?

14 A. From Feeding Our Future.

15 Q. Paging down, on page 32 there's another car rental the
16 following day, January 30th, 2021; is that right?

17 A. Yes.

18 Q. And what car did Ms. Bock and Mr. Watson rent that day
19 in Las Vegas?

20 A. A green Lamborghini.

21 Q. Back to the same, the first car?

22 A. Yes.

23 Q. Okay. How much did they pay for it?

24 A. \$2,035.39.

25 Q. For 24 hours?

1 A. Yes.

2 Q. And those were funds that were coming from the Handy
3 Helpers account, but ultimately where did they come from?

4 A. Feeding Our Future.

5 Q. And who transferred the funds from Feeding Our Future to
6 Handy Helpers?

7 A. Aimee Bock. It was Aimee Bock.

8 Q. Okay. Going back to page 72 of the Handy Helpers
9 account, Government Exhibit W46, there's some other spending
10 while they were in Vegas correct?

11 A. That is correct.

12 Q. Could you describe the highlighted one on February 1st,
13 2021?

14 A. Yes. That was a purchase from January 30th from Louis
15 Vuitton in Las Vegas for \$3,505.93.

16 Q. Okay. And for those on the jury, there must be someone
17 on the jury who doesn't know. What's Louis Vuitton?

18 A. It's a high end clothing line that also sells backpacks.

19 Q. Purses and stuff?

20 A. Yep.

21 Q. Okay. During the investigation, Ms. Bock's residence
22 was searched, as was her phone, correct?

23 A. Yes.

24 Q. And were there photos recovered from her phone?

25 A. Yes, there were.

1 Q. Including photos taken during this trip to Las Vegas?

2 A. Yes.

3 Q. And have those been marked but not yet admitted as
4 Government Exhibit BB50?

5 A. Yes.

6 MR. THOMPSON: Your Honor, I move to admit
7 Government Exhibit BB50.

8 THE COURT: Any objection?

9 MR. UDOIBOK: No objection.

10 MR. MONTEZ: No objection.

11 THE COURT: BB50 is admitted.

12 BY MR. THOMPSON:

13 Q. Again, can you describe what's on the screen here,
14 Ms. Jansma?

15 A. Yes, that is Empress Watson making some lewd hand
16 movements with -- standing in front of the green
17 Lamborghini.

18 Q. Let's ignore the hand signs, which I'm sure he's just
19 goofing around, but there's a series of pictures taken in
20 front of that green Lamborghini that he and Ms. Bock rented,
21 correct?

22 A. That is correct.

23 Q. And that's Mr. Watson pictured?

24 A. Yes, it is.

25 Q. Ms. Bock's live-in boyfriend.

1 A. Yes.

2 Q. What do we see on page 7 of this exhibit?

3 A. We see Empress Watson standing in front of a fountain
4 with two bags from Louis Vuitton.

5 Q. And these photos, whose phone were they -- whose phone
6 was used to depict them? Who took these photos?

7 A. Aimee Bock.

8 Q. Okay. And at page 9 what do we see?

9 A. Empress Watson wearing his new Louis Vuitton backpack.

10 Q. Okay. Page 10 and 11, similar photos taken by Ms. Bock?

11 A. Yes.

12 Q. And just to be clear, at page 6, that green Lamborghini,
13 that's one of the ones they represented for 24 hours while
14 in Vegas?

15 A. Yes.

16 Q. There was another trip to Vegas, correct?

17 A. Yes, there was.

18 Q. Directing your attention back to Government Exhibit W46,
19 which is the Handy Helpers bank account, and specifically
20 page 80 which is a statement from March of 2021, correct?

21 A. Yes.

22 Q. And if I look on here at the bottom, another trip to Las
23 Vegas; is that right?

24 A. Yes, it is.

25 Q. And do we have similar type spending in Las Vegas?

1 A. Yes.

2 Q. Take a picture here. And it starts out on March 22nd, a
3 couple of charges to Royalty Exotic; is that right?

4 A. Yes.

5 Q. And is that the same car rental spot that we looked at
6 earlier?

7 A. Yes, it is.

8 Q. Okay. Then there's another charge that same day for
9 \$2,600, \$2,653, correct?

10 A. That is correct.

11 Q. And where was that charge at?

12 A. That was from Ralph Lauren, the Polo store.

13 Q. Okay. Did you -- directing your attention back to
14 Government Exhibit S51 and specifically page 38, did you,
15 did you obtain records from Royalty Exotic about the rental
16 of that car out of the Handy Helpers account?

17 A. Yes, we did.

18 Q. And what did you find?

19 A. That on March 19th Empress Watson and Aimee Bock rented
20 a Rolls Royce.

21 Q. Okay. Now for reasons I don't fully understand, it
22 talks about Newport Beach, California.

23 A. Yes, it does.

24 Q. Do you know whether they rented this car in Newport
25 Beach or in Las Vegas or what happened?

1 A. It appears that they maybe started in Vegas, went to the
2 coast, and then back to Vegas.

3 Q. Hard to say, though?

4 A. Right.

5 Q. Okay. And how much did they spend on this car?

6 A. It was \$1,162.60.

7 Q. I think they rented it for a couple days; is that right?

8 A. Yes.

9 Q. Okay.

10 A. Well, this one is for one day.

11 Q. Okay. There were other trips to Vegas with other luxury
12 car rentals?

13 A. Yes, they were.

14 Q. I guess we call this exotic car rentals?

15 A. Yep.

16 Q. Okay. During the search of Ms. Bock's phone, were there
17 photos taken during this March 2021 trip to Las Vegas?

18 A. Yes, there were.

19 Q. I'm going to show you what's been marked, but not yet
20 admitted, as Government Exhibit BB51. Are these photos
21 taken from Ms. Bock's phone?

22 A. Yes, they are point.

23 MR. THOMPSON: Your Honor, I move to admit
24 Government Exhibit BB51.

25 MR. UDOIBOK: No objection.

1 MR. MONTEZ: No objection.

2 THE COURT: BB51 is admitted.

3 BY MR. THOMPSON:

4 Q. All right. Ms. Jansma, could you tell us what we're
5 looking at here at the first page?

6 A. Yes. This is in the airport, the Clark County
7 International Airport in Las Vegas, and that appears to be
8 Aimee Bock and Empress Watson, standing in the middle.

9 Q. Page 2, what do we see?

10 A. Empress Watson and Aimee Bock in the Rolls Royce that
11 has the suicide doors.

12 Q. All right. And then page 3 is another picture of
13 Ms. Bock and her boyfriend in front of the Rolls Royce that
14 they rented?

15 A. Yes.

16 Q. Page 4, there's another photo of them; is that right?

17 A. Yes, I believe that's at Madam Tussauds Wax Museum
18 perhaps.

19 Q. Okay. And then page 6 and 7 is more, additional photos
20 of Ms. Bock and Mr. Watson in the Rolls Royce that they
21 rented?

22 A. Yes.

23 Q. The funds that they used to rent that Rolls Royce in
24 Las Vegas and to pay for that trip generally, where did they
25 come from?

1 A. From the Handy Helpers bank account.

2 Q. And the funds that were in the Handy Helpers bank
3 account, where did it come from?

4 A. Feeding Our Future.

5 Q. And who transferred the money there?

6 A. Aimee Bock.

7 Q. In addition to those car rentals, there was about
8 \$71,000 out of the Handy Helpers account for vehicle
9 expenses, assets; is that right?

10 A. Yes.

11 Q. What does that entail?

12 A. That relates to payments for either buying cars or
13 making improvements to cars.

14 Q. Okay. And there's several cars that, who have expenses
15 for which there are expenses in the account; is that
16 correct?

17 A. Yes.

18 Q. For example, on page 112 of Government Exhibit 46, W46,
19 there's a \$2,000 charge to Tesla; is that right?

20 A. Yes.

21 Q. On August 25th of 2021?

22 A. Yes, that's correct.

23 Q. There are additional charges to -- from Tesla to this
24 account?

25 A. Yes, there are.

1 Q. And what do those charges relate to?

2 A. The payment for Empress Watson's Tesla.

3 Q. He had a Tesla?

4 A. Yes, he did.

5 Q. And how was he paying for it?

6 A. With the money from Handy Helpers.

7 Q. That came from?

8 A. Feeding Our Future.

9 Q. And Ms. Bock?

10 A. And Ms. Bock, yes.

11 Q. There's also other types of expenses on here, I believe,
12 is that right? Here August 30th, \$2600 at Scheels in
13 Eden Prairie?

14 A. Yes.

15 Q. What's Scheels?

16 A. Scheels is a sporting goods store that sells a lot of
17 clothes.

18 Q. So what kind of expenses were at Scheels, do you know?

19 A. We did not subpoena those records.

20 Q. Okay. All right. In addition to the Tesla charges,
21 there's also charges related to a Porsche; is that right?

22 A. Yes.

23 Q. From the Handy Helpers account?

24 A. Yes, that's correct.

25 Q. And whose Porsche was that?

1 A. That was -- at the time it was Empress Watson's car,
2 along with a prior girlfriend.

3 Q. Okay. You said, "At the time." Did that change at some
4 point?

5 A. Yes.

6 Q. How did it change?

7 A. Aimee Bock purchased the vehicle or obtained the title
8 for ownership of the vehicle.

9 Q. What do you mean by that? You kind of smiled there.
10 Why?

11 A. Well, there was a title transfer to Aimee Bock where she
12 claimed to have purchased the Porsche for \$9,000.

13 Q. You said, "Claimed to." Why do you say that?

14 A. Well, we didn't see any actual payments for the Porsche
15 from Aimee Bock, just the payments out of the Handy Helpers
16 account.

17 Q. Okay. It was paid for using Handy Helpers?

18 A. Yes.

19 Q. And in fact I think the jury saw a text message between
20 Ms. Bock and Mr. Watson earlier in the trial related to that
21 Porsche; is that right?

22 A. I believe so, yes.

23 Q. I'm showing you what's been admitted as Government
24 Exhibit BB51c, which is Facebook messages between Ms. Bock
25 and her boyfriend Empress Malcolm Watson, correct?

1 A. Yes.

2 Q. And they're talking about money here. What does
3 Ms. Bock say to her boyfriend about the Porsche?

4 A. She says, "I bought a car that I don't even know where
5 it is or have a key to."

6 Q. That's the Porsche?

7 A. Yes.

8 Q. Okay. And that Porsche, what happened to it during the
9 investigation?

10 A. We seized it.

11 Q. Okay. And do we have a picture of it here?

12 A. Yes, we do.

13 Q. It's been marked, but not yet admitted, as Government
14 Exhibit S57. Is that photo Ms. Bock's Porsche?

15 A. Yes, it is.

16 MR. THOMPSON: Your Honor, I move to admit
17 Government Exhibit S57.

18 THE COURT: Any objection?

19 MR. UDOIBOK: No objection.

20 MR. MONTEZ: No objection.

21 THE COURT: S57 is admitted.

22 BY MR. THOMPSON:

23 Q. Okay. Is that the Porsche that Ms. Bock and her
24 boyfriend Mr. Watson had?

25 A. Yes.

1 Q. And how was it paid for?

2 A. It was paid for with the money out of Handy Helpers that
3 came from Feeding Our Future.

4 Q. Okay. Now, finally, there's one more car that was
5 seized during the investigation; is that right?

6 A. Yes.

7 Q. And what car was that?

8 A. That was a Mercedes.

9 Q. Okay. I want to talk a little bit about that Mercedes,
10 but I want to kind of get there slowly here. Okay?

11 A. Okay.

12 Q. First I want to show you another text message between
13 Ms. Bock and her boyfriend. And this is Government
14 Exhibit BB41e.

15 Okay. Just at the top here there's again messages
16 between Ms. Bock and her boyfriend; is that right?

17 A. Yes.

18 Q. And the date?

19 A. January 10th of 2022.

20 Q. Okay. And what does Ms. Bock say to her boyfriend that
21 day? It seems like they're having a little bit of a
22 disagreement, right?

23 A. Yes.

24 Q. What does she say?

25 A. "Paid you 26,000 since Friday, and I can't even get

1 talked to with respect. You don't like me; fine. You don't
2 love me; fine. But goddamn respect me. I've earned at
3 least that."

4 Q. You said she's paid Mr. Watson \$26,000 since the prior
5 Friday?

6 A. Yes.

7 Q. And this was on January 10th of 2022?

8 A. Yes, it was.

9 Q. And if we look into the bank records at Handy Helpers,
10 do you find a series of payments from Feeding Our Future and
11 Ms. Bock to Mr. Watson's company?

12 A. Yes, there are deposits.

13 Q. Shortly before this?

14 A. Yes.

15 Q. And specifically here at page 443 of Government
16 Exhibit 46, what do we see? See another wire transfer,
17 correct?

18 A. Yes.

19 Q. And who is it from?

20 A. Feeding Our Future.

21 Q. Who is it to?

22 A. Handy Helpers.

23 Q. And when is it sent?

24 A. December 20th of 2021.

25 Q. \$10,000?

1 A. \$10,000.

2 Q. The next page there's another \$15,000 sent from Feeding
3 Our Future to Handy Helpers three days later, correct?

4 A. That is correct.

5 Q. December 23rd, 2021?

6 A. Yes.

7 Q. And the next page, 445 of Government Exhibit W46, what
8 do we see here?

9 A. A \$15,000 transfer on December 31st.

10 Q. From who to who?

11 A. From Feeding Our Future to Handy Helpers.

12 Q. That text message we just looked at, that was on
13 January 10th?

14 A. Correct.

15 Q. 2022, correct?

16 A. Yes.

17 Q. I direct your attention to page 141 of Government
18 Exhibit W46, the January 2022 statement for Handy Helpers.
19 Okay?

20 A. Okay.

21 Q. And what do we see the same day as that text message?

22 A. A \$15,000 wire transfer from Feeding Our Future.

23 Q. To Handy Helpers?

24 A. To Handy Helpers, yes.

25 Q. The same day as that text message?

1 A. Correct.

2 Q. And how is that money used, that \$15,000?

3 A. That was used to purchase a Mercedes. It was a \$10,000
4 cashier's check.

5 Q. And I'm directing your attention now to page 451 of
6 Government Exhibit W46. What do we see here?

7 A. We see a receipt for a cashier check purchased by
8 Empress Watson for \$10,000 payable to Mercedes Benz of
9 St. Paul.

10 Q. And what is the date on which Mr. Empress obtained this
11 cashier's check for Mercedes Benz of St. Paul?

12 A. January 10th of 2022.

13 Q. The same day that Ms. Bock had wired him \$15,000 from
14 Feeding Our Future?

15 A. Yes, that's correct.

16 Q. Did you obtain records related to the purchase of that
17 Mercedes Benz?

18 A. Yes, we did.

19 Q. I'm going to show you what's been marked, but not yet
20 admitted, as Government Exhibit BB15. Is this the purchase
21 agreement for that Mercedes Benz?

22 A. Yes, it is.

23 MR. THOMPSON: Your Honor, I move to admit
24 Government Exhibit BB13.

25 THE COURT: This is 15, I believe. 15?

1 MR. THOMPSON: Yes.

2 THE COURT: Any objection?

3 MR. UDOIBOK: No objection.

4 MR. MONTEZ: No objection.

5 THE COURT: BB15 is admitted.

6 BY MR. THOMPSON:

7 Q. Okay. All right. Ms. Jansma, what do we see here in
8 this purchase agreement?

9 A. The purchaser name is listed as Empress Malcolm Watson,
10 Jr., at 13299 Bronze Parkway in Rosemount.

11 Q. Okay. And what is the date on this purchase agreement?

12 A. January 10th of 2022.

13 Q. Same day as that transfer we just looked at?

14 A. Yes.

15 Q. What did Mr. Watson purchase that day?

16 A. 2018 Mercedes Benz GLE.

17 Q. Okay. And what was the cost of that car?

18 A. \$70,000.

19 Q. And at page 4 what do we see in the purchase file, so
20 the car dealership's file?

21 A. That's a copy of the cashier's check that Empress
22 provided to the dealership.

23 Q. How much is the cashier's check?

24 A. \$10,000.

25 Q. Where did these funds come from?

1 A. From the Handy Helpers account.

2 Q. And the money in that account came that same day,
3 correct?

4 A. Correct.

5 Q. From Feeding Our Future?

6 A. Yes.

7 Q. And who transferred the funds from Feeding Our Future to
8 Handy Helpers so Mr. Watson could purchase this Mercedes
9 Benz on January 10th, 2022?

10 A. Aimee. Aimee Bock.

11 Q. Using funds from the Federal Child Nutrition Program?

12 A. Yes.

13 Q. I'm going to show you now -- that car was yet later
14 recovered?

15 A. Yes.

16 Q. When was it recovered?

17 A. January 20th, 2022.

18 Q. Where was it recovered?

19 A. In Aimee Bock's garage on the Bronze Parkway Avenue.

20 Q. That Ms. Bock's residence?

21 A. Yes.

22 Q. And I'm showing you now what's been admitted as
23 Government Exhibit BB1 at page 24. What do we see here?

24 A. That is a photograph of the Mercedes.

25 Q. I see it's got the dealer plates still; is that right?

1 A. That is correct.

2 Q. And it had been purchased -- on page 25 there's another
3 dealer plate, correct?

4 A. Yes. That's a temporary plate.

5 Q. And at page 26, what do we see?

6 A. We see the Louis Vuitton backpack in the back.

7 Q. This Mercedes Benz, this was taken on January 20th,
8 2022, the day of the search warrants. How many days prior
9 to that had Ms. Bock purchased it or Mr. Watson?

10 A. Twelve days.

11 Q. Okay. And again, where did the funds come from that
12 were used to purchase this car?

13 A. From Handy Helpers.

14 Q. And ultimately before that?

15 A. Feeding Our Future.

16 Q. Through Ms. Bock?

17 A. Yes, through Aimee Bock.

18 MR. THOMPSON: Thank you, Your Honor. No further
19 questions, Your Honor.

20 THE COURT: At this time we'll take our noon
21 break. So we will come back at 12:30.

22 All rise for the jury.

23 Sorry. 1:30.

24 (Recess taken at 12:31 p.m. till 1:34 p.m.)

25

1 1:34 P.M.

2 **IN OPEN COURT**

3 **(JURY PRESENT)**

4 THE COURT: Good afternoon. You may be seated.

5 And Mr. Udoibok, cross-examination.

6 MR. UDOIBOK: Thank you, Your Honor.

7 CROSS-EXAMINATION

8 BY MR. UDOIBOK:

9 Q. Ms. Jansma, my name is Kenneth Udoibok, and I represent
10 Aimee Bock. Good afternoon.

11 A. Good afternoon.

12 Q. I have a few questions for you, though.

13 Just to get the sense of your testimony today,
14 your focus was on the money, correct?

15 A. That is correct.

16 Q. And you didn't focus your investigation on the people
17 involved?

18 A. We were looking at the people that were moving the money
19 around, yes.

20 Q. People that were moving money around.

21 I want to start first, the area that concerns
22 Ms. Bock primarily, but then I'll walk backwards.

23 Let's look at S40. Ms. Mallet, could you call up
24 S40, please.

25 This is a Certificate of Authentication. Go to

1 the next page. I believe you testified that this is a
2 registration for Handy Helpers, correct?

3 A. That is correct.

4 Q. And is Ms. Bock part of the registration in Exhibit S40?

5 A. No, she is not.

6 Q. And I believe you testified that the registration was
7 done, the state certificate was issued November 2021; is
8 that correct?

9 A. No. It was November of 2019.

10 Q. 2019. And the certificate here says 2021, doesn't it?
11 Could you call out --

12 A. That is the administrative termination date. If you
13 look at the line above, it says filing date November 18th,
14 2019.

15 Q. All right. That's what I wanted to get cleared up.
16 Then go to page 4, Ms. Mallet.

17 What is this?

18 A. This is an application with the Office of the Minnesota
19 Secretary of State.

20 Q. And call out the Empress, the registered agent. Yeah,
21 there you go.

22 And is, it is Empress Watson, Jr., correct?

23 A. Empress Watson, Jr., is listed as the organizer.

24 Q. And who, is there a difference between Empress Watson,
25 Jr., and Empress Watson?

1 A. There is an Empress Watson, Sr.

2 Q. Okay. All right.

3 A. This is Empress Watson, Jr.

4 Q. All right. So and what is the address on the
5 registration?

6 A. 709 Hamline Avenue North in St. Paul.

7 Q. And this was done when?

8 A. The date is November 18th, 2019.

9 Q. I want you to take note of that address as we continue.

10 Now, go to page 5, Ms. Mallet.

11 And what is this?

12 A. This is a Minnesota business snapshot.

13 Q. The first section, what is the first section about?

14 A. Starting with Number 1?

15 Q. Yes.

16 A. That is asking how many Minnesota-based full-time
17 employees or full-time equivalent does this entity currently
18 have, and the box with zero to five is checked.

19 Q. All right. During your investigation, did you determine
20 whether or not Mr. Watson had employees?

21 A. We did, yes.

22 Q. Did he?

23 A. Later on he hired a couple of individuals.

24 Q. Later on. When? When was that?

25 A. Later on in 2020.

1 Q. 2020. Okay. He hired a couple of people?

2 A. Yes.

3 Q. When you mean a couple, is that two or three?

4 A. I can recall two, plus himself, if we were looking at
5 the payroll records. I apologize. I should have included
6 that Empress put himself on the payroll also.

7 Q. All right. So let's go to page 6.

8 And this is the Certificate of Filing from the
9 Minnesota Secretary of State, correct?

10 A. Yes.

11 Q. Establishing the handyman LLC as a corporation?

12 A. It's just registering the LLC --

13 Q. All right.

14 A. -- as a limited liability company.

15 Q. All right.

16 A. I believe the term "corporation" would be inappropriate.

17 Q. Oh, okay. I'm sorry.

18 I want to talk about some of the deposits you
19 testified earlier.

20 Ms. Mallet, go to W46.

21 So the registration, you testified on S40, does
22 not Ms. Bock, does it?

23 A. No.

24 Q. All right. Let's go to the bank, banking. Call out
25 what, the first section there.

1 So this is a Wells Fargo account that you
2 testified to, right?

3 A. That's correct.

4 Q. And the banker is Greg Brown?

5 A. That is the individual at Wells Fargo who completed the
6 documents to open the bank account.

7 Q. All right. So let's just walk through.

8 There's a lot of pages. I don't want to belabor
9 you with all these pages, but let's go to page 5 of
10 Exhibit W46.

11 And the address now has changed to 13299 Bronze
12 Parkway, correct?

13 A. Yes, that was the initial address used when the account
14 was opened.

15 Q. All right. So when he registered the corporation, it
16 was a different address. And the bank, as you have seen in
17 46, is now the address, Ms. Bock's address presumably where
18 he lived, correct?

19 A. Correct.

20 Q. All right. So let's continue a bit to page 6. Call out
21 the first transaction history there. Call out of it.

22 Sorry. The entire transaction history.

23 All right. So on March 12th the entry of \$25
24 credit, is that the amount used in opening the account?

25 A. Yes, that's what was indicated on the opening document.

1 Q. All right. And then followed by \$500 deposit from which
2 entity?

3 A. Feeding Our Future.

4 Q. Feeding Our Future. And then there's another deposit
5 for \$3,000, correct?

6 A. Correct.

7 Q. Ms. Mallet, are you able to just highlight the debits,
8 the debit column. Debit column. Not that. Debit.

9 MS. MALLET: Oh, sorry.

10 BY MR. UDOIBOK:

11 Q. All right. I want to walk a little slowly with you.

12 So on March 20th there is a \$300 debit?

13 A. Correct.

14 Q. All right. And was that a cash withdrawal?

15 A. That was an ATM withdrawal.

16 Q. Then on the 23rd there's another \$300 withdrawal,
17 correct?

18 A. That is correct.

19 Q. And it goes all the way to on the 30th \$1,400
20 withdrawal?

21 A. That was an online transfer.

22 Q. Online transfer. On the 30th the transfer is to which
23 account?

24 A. Empress Watson's personal checking account.

25 Q. Let's go to the 27th. There's another withdrawal,

1 correct?

2 A. Correct.

3 Q. And what type of withdrawal is that? Credit card?

4 A. That's an ATM withdrawal.

5 Q. All right. And then on the 27th there's a \$3,500
6 deposit from Feeding Our Future; is that correct?

7 A. That's correct.

8 Q. So if you look at the withdrawal columns, the total
9 withdrawals is about \$4,265.50, correct?

10 A. Yes, that's what's indicated on the sheet.

11 Q. Do you know, based on your investigation, how the
12 \$4,265.50 was spent?

13 A. We traced the funds that were transferred to Empress
14 Watson's personal account, but we don't know what he did
15 with the cash.

16 Q. So you traced the amount, just so I understand, from
17 Exhibit 46 account to Mr. Watson's personal account,
18 correct?

19 A. That's correct.

20 Q. But you don't have information as to what he used that
21 money for, from his personal account?

22 A. We do. We did receive all of the accounts for his
23 personal account, and we traced what he did with those
24 funds. It's the cash withdrawals, we don't know what he
25 spent the cash on.

1 Q. All right. And you were saying there was significant
2 cash withdrawals, would you?

3 A. Overall from this account it was significant.

4 Q. Okay. But you don't know what he spend those cash for?

5 A. We know at least on one of the receipts for the wedding
6 diamonds, the Wedding Day Diamonds, there was some cash used
7 as part of the payment.

8 Q. Now, Wedding Day Diamond. Do you know who was a
9 beneficiary of that Wedding Day Diamond purchase?

10 A. I would hope it would be Aimee Bock and not a different
11 female.

12 Q. You don't know, do you?

13 A. No, I don't know who was wearing the jewelry.

14 Q. Thank you. So let's go to page 8, the following month.

15 So this is also, you testified this is April now,
16 correct?

17 A. I'm sorry. What?

18 Q. This is a statement for April 30th, 2020?

19 A. Yes, this is the -- yes.

20 Q. And, Ms. Mallet, go to the next page. Highlight. Call
21 out the entire transaction history, please. All right. So
22 then highlight the withdrawals.

23 So this time around there's about \$8,460 of
24 withdrawals from the account, correct?

25 A. It's 9,460.

1 Q. Right. 9,000. And consistently there is a \$3,000
2 deposit from Feeding Our Future, correct?

3 A. Yes, four times there was a \$3,000 deposit.

4 Q. Totaling about \$12,000?

5 A. Yep.

6 Q. Based on your investigation, do you know what Mr. Watson
7 did for Feeding Our Future to earn the \$3,000?

8 A. No.

9 Q. All right. Do you know one way or the other whether
10 Mr. Watson was a contractor with Feeding Our Future?

11 A. The payments indicated that they were for a contractor.

12 Q. Okay. All right. Well, you don't know what the nature
13 of the contract and relationship was?

14 A. No, there were no receipts or invoices that we were able
15 to locate that supported that information.

16 Q. Ms. Mallet, could you please call out the transaction
17 history and highlight the withdrawals. All right.

18 Out of the \$9,460 withdrawals, were you able to
19 discern what Mr. Watson spent the \$9,460 withdrawal?

20 A. Well most of these were transfers to his personal
21 account, which we would have followed, and then there were a
22 few, looks like, maybe one transfer on this page that went
23 to the Above All Classic Muscle Cars for \$410.

24 Q. All right. And so you, you were able to, from his
25 personal account, all of his purchases. Is that your

1 testimony?

2 A. We documented everything that he took out of that
3 account, because we received all the bank statements
4 indicating what he used that money for.

5 Q. What about the credit card withdrawals? Could you tell
6 what he spend that money for?

7 A. I don't see any credit card withdrawals on here.

8 Q. In exhibit -- I thought you saw that in a credit card
9 withdrawal on page 6 of Exhibit 46.

10 Go to page 6, Ms. Mallet.

11 Was there any credit card transaction?

12 No. Do the withdrawals also. Call that out. All
13 right.

14 Was there any ATM withdrawals?

15 A. Yes, there's ATM withdrawals.

16 Q. Okay.

17 A. I wouldn't call those credit card purchases.

18 Q. Okay. But do you know what those ATM withdrawals were
19 used for?

20 A. No. That was cash.

21 Q. Okay.

22 A. Okay.

23 Q. Let go to page 13. This is quite significant. Let's do
24 it by bits. Ms. Mallet, could you call out the first third.

25 All right. So let's just highlight the withdrawal

1 section. All right.

2 So in this section there's, on May 1st, there's a
3 thousand dollar withdrawal. Was it cash or what was it?

4 A. Yes, we believe that was a cash withdrawal based on
5 information from the bank.

6 Q. And how he spend that, you don't have any information,
7 do you?

8 A. No.

9 Q. All right. Was there any other cash withdrawal in this
10 call-out section that you see?

11 A. No.

12 Q. All right. And the rest seem to be transfer to his
13 personal account, correct?

14 A. As well as the Above All Classic Muscle Cars LLC
15 account.

16 Q. From this document, you think Mr. Watson loves cars,
17 won't you?

18 A. Sure, yeah.

19 Q. And these transactions, though, were not done by
20 Ms. Bock, were they?

21 A. No. These transactions do not appear to be done by
22 Ms. Bock.

23 Q. Okay. And Ms. Bock is not a signatory to that account,
24 is she?

25 A. She is not a signer.

1 Q. All right. So let's go to 24. You testified about
2 page 24. Call out the first third, just for --

3 Now there's a \$7,000 deposit from Feeding Our
4 Future, and it was July 2nd, correct?

5 A. Yes.

6 Q. Followed by on the 8th a \$7,000 deposit, correct?

7 A. Yep.

8 Q. Based on your investigation, did you know what
9 Mr. Watson performed for Feeding Our Future to earn the
10 \$7,000?

11 MR. THOMPSON: Objection. Assumes facts not in
12 evidence.

13 THE COURT: Sustained.

14 BY MR. UDOIBOK:

15 Q. All right. So there's a \$7,000 transfer, payment from
16 Feeding Our Future to Mr. Watson, correct?

17 A. Yes.

18 Q. And also on July 8th a \$7,000 payment, correct?

19 A. Yes.

20 Q. All right. And based on your testimony earlier, you
21 followed the money, correct?

22 A. Yes.

23 Q. All right. And how that money was earned, that's not
24 the focus of your investigation, was it?

25 A. Well, there was no indication supporting how the money

1 was supposed to go to this account. It was just transferred
2 there.

3 Q. All right. Fair enough.

4 Let's go to the other, the third half. Call out.

5 So there is on the 15th, there's a \$7,000, it was
6 a transfer, right, or was it a deposit from Feeding Our
7 Future?

8 A. It says transfer.

9 Q. All right. So let's, let's talk a bit about Government
10 Exhibit X24 that you testified to earlier. I believe that's
11 a, it's a chart.

12 All right. So you testified in breaking down the
13 payments to Handy Helpers LLC from Feeding Our Future.

14 And, Ms. Mallet, could you call out the first box.
15 All right.

16 Now, your testimony was about \$878,503.78, was
17 paid to Handy Helpers by Feeding Our Future, correct?

18 A. Yes.

19 Q. All right. And those moneys went directly to Handy
20 Helpers account, correct?

21 A. Yes.

22 Q. They did not go to an account shared by Ms. Bock, was
23 it?

24 A. No.

25 Q. And you testified earlier that the withdrawals from the

1 Wells Fargo account presumably was done by Mr. Watson,
2 correct?

3 A. Yes.

4 Q. Release the call-out. And call out the shopping,
5 shopping section. There you go.

6 And you also testified that out of that 800
7 something thousand there were about 212,000 cash
8 withdrawals, correct?

9 A. Yes.

10 Q. And what was the 168,000 for?

11 A. Those are transfers to Empress Watson's, Empress M.
12 Watson, Jr.'s, personal account of 128,000 and then a
13 transfer to the above All Classic Muscle Cars LLC account,
14 also owned by Empress Watson, Jr.

15 Q. And those transfers presumably again was performed by
16 Mr. Watson, correct?

17 A. Yes.

18 Q. Ms. Mallet, let's go to S46, S like in Sam, 46, if I can
19 read my writing.

20 This is ADP. What is ADP, if you know?

21 A. Automated Data Processing.

22 Q. Call out the first section there, so we know.

23 Could you, for the benefit of the jury, could you
24 tell us what this is?

25 A. This is an authorization for a power of attorney for

1 Handy Helpers LLC to ADP, authorizing access to the Handy
2 Helpers bank account for remitting payroll tax withholdings
3 for tax such as unemployment, federal unemployment, which is
4 filed on a Form 940, Security Social, Medicare and federal
5 withholding that is filed on Form 941, and it lists the
6 quarters here as 2020, second quarter of 2020.

7 Q. All right. So was this transaction, if you know,
8 performed by Ms. Bock?

9 A. The name indicates that it was Aimee Bock who authorized
10 this.

11 Q. All right. Who authorized the ADP -- where would that
12 be? I think it's lower in the bottom, correct?

13 A. Yep.

14 Q. Release the callout. There you go.

15 So Ms. Bock, though, is not a member of Handy
16 Helper LLC, is it -- was she?

17 A. She was not listed on the Secretary of State documents,
18 but the Secretary of State's documents don't always
19 reference all of the owners of an entity, all of the
20 members.

21 On this form, she signed it as a member.

22 Q. As a member or representative?

23 A. It says "Member" under title.

24 Q. Oh, it says "Member" -- okay. And member of Handy
25 Helpers for the, for the purpose of ADP, correct?

1 A. Correct.

2 Q. So let's go to 47, S47. Sorry. S47. All right.

3 So at this point -- call out the first. Yeah,
4 there you go.

5 So this is, is this a month after the first, the
6 registration, correct, with the ADP?

7 A. I don't remember the date that the ADP was set up, the
8 first page.

9 Q. Let's go to 46 again just so we have the dates correct.

10 So call out the first. There you go.

11 This is, this is 2020 May, right?

12 A. Yes.

13 Q. All right. Was this the first registration?

14 A. With ADP?

15 Q. Yes.

16 A. I believe so.

17 Q. All right. Let's go to 47.

18 So now ADP is writing to Handy Helpers and
19 Ms. Bock at this address, correct?

20 A. It's an invoice dated February 1st of 2021.

21 Q. All right. So, Ms. Mallet, call out the third, the
22 middle half. There you go.

23 Do you understand what this is, because I didn't.
24 What is it?

25 A. This is a notification that their invoice for the tax

1 processing will be automatically debited from the bank
2 account on February 10th of 2021, and the amount that will
3 be withdrawn is \$11.36.

4 Q. Was it, what's that withdrawal, the \$11, is that for the
5 ADP processing fee? Is that what it is?

6 A. That's a processing fee, yes.

7 Q. So let's go to X24 again.

8 Now I'm curious about the entertainment and
9 recreation section, which is \$20,000.

10 And these expenditures were done by Mr. Watson,
11 was it?

12 A. Presumably, yes.

13 Q. Okay. Not Ms. Bock, was it? Not Ms. Bock?

14 A. No, no.

15 Q. All right. Let's go back to W46. I want to go to
16 page 157.

17 This is a check from Feeding Our Future to Handy
18 Helpers, correct?

19 A. Correct.

20 Q. And the date is January 15, 2021?

21 A. Yes, it is.

22 Q. All right. Let's go to 161.

23 This is another check from January to Handy
24 Helpers?

25 A. Yes, it is.

1 Q. Go to 163.

2 That's another check. This is February, correct?

3 A. Correct.

4 Q. Now go to 170.

5 This is another check, correct?

6 A. Yes.

7 Q. All right. Now, I know you testified to these earlier.

8 I just -- you agree with me that the checks are consistent
9 round figure amount, correct?

10 A. Yes.

11 Q. But you don't know what the arrangement was between
12 Feeding Our Future and Mr. Watson.

13 A. No.

14 Q. Okay. Let's go to the same exhibit. Let's go to
15 page 423.

16 You testified to this earlier.

17 Could you call out that section, please. All
18 right.

19 What was -- I don't recall what your testimony
20 was. Was this, what type of transaction was this?

21 A. This is a wire.

22 Q. A wire from which account to which account?

23 A. The remitter is Feeding Our Future. The beneficiary is
24 Handy Helper.

25 Q. All right. And how much?

1 A. 10,000.

2 Q. Go to page, same exhibit, 425.

3 This is another wire transfer report?

4 A. Yes.

5 Q. How much?

6 A. 10,000.

7 Q. Same amount?

8 A. Yes.

9 Q. And again, you don't know what the relationship between
10 Handy Helpers and Feeding Our Future was?

11 A. No.

12 Q. Okay. You testified to an account ASLO.

13 Go to -- Ms. Mallet, go to S43. Call out the
14 first. It seems like an email.

15 All right. This is an email from Azlo
16 notification. What is Azlo notification?

17 A. It's the entity that sends confirmations for
18 transactions.

19 Q. So Feeding Our Future sends, is it a Feeding Our Future
20 email, or is it a personal email?

21 A. It's sent to a Feeding Our Future email.

22 Q. All right. About a payment of \$4,000?

23 A. That is correct.

24 Q. Back in May 2020, correct?

25 A. Yes.

1 Q. And did your investigation lead you to know what the
2 payment was for?

3 A. It was a payment to Handy Helpers.

4 Q. Just that?

5 A. Yeah. There's no note on there indicating the purpose
6 of the payment.

7 Q. Okay. Go to the next page.

8 And that's just, it's nothing consequential, is
9 it?

10 A. No.

11 Q. All right. I'm directing you to S44. You testified to
12 this exhibit. This is another online transaction, correct?

13 A. Yes.

14 Q. This is September 2021, payment from Feeding Our Future
15 to Handy Helper, correct?

16 A. That is correct.

17 Q. This transaction is not to Ms. Bock's personal account,
18 is it?

19 A. No.

20 Q. All right. So I believe we looked at W46. And you
21 testified specifically to page 38.

22 Ms. Mallet, would you call up W46, page 38.

23 Let's just walk through slowly -- there you go.

24 So I believe you testified about the Home Depot
25 purchase?

1 A. Yes.

2 Q. Do you see that?

3 A. Yep.

4 Q. And I have forgotten. What was your testimony that the
5 purchase was?

6 A. That was for new carpeting to be installed at Aimee
7 Bock's house.

8 Q. And you saw -- all right. Was the carpeting installed
9 at Aimee Bock's house?

10 A. Yes.

11 Q. How do you know that?

12 A. Because that's what it said on the document.

13 Q. Oh, on the receipt of purchase.

14 A. That was emailed to Aimee Bock.

15 Q. All right. You mean the receipt that was emailed to
16 Ms. Bock?

17 A. Correct.

18 Q. All right. But did you, when you investigated because
19 you know whether the carpeting was in fact installed at
20 Ms. Bock's home?

21 A. Yes, it says so. It says address of the installation on
22 the receipt.

23 Q. So let's go to the other half.

24 So now that carpet, who purchased it? It was
25 Mr. Watson, correct?

1 A. No. It appears to be Aimee Bock.

2 Q. Whose account is X46?

3 A. Handy Helpers.

4 Q. All right. Now, Ms. Bock is not a signatory to that
5 account, is she?

6 A. No, she's not.

7 Q. All right. You, I don't want you to speculate. How
8 would she purchase it from an account that she didn't own?

9 A. Well, she ordered the carpeting online and probably used
10 the debit card, keeping the information from the debit card
11 that Empress likely shared with her.

12 Q. You are making some assumptions here, aren't you?

13 A. Yes, I am.

14 Q. Okay. That's just what I just want to make sure.

15 A. I didn't know any other way to answer your question.

16 Q. All right. I'll try to make it a little clearer.

17 Now let's go to S39, the second page. Make it
18 readable. All right.

19 Is this the Home Depot quote?

20 A. Yes.

21 Q. And it sold to Ms. Bock, correct?

22 A. That is correct.

23 Q. But purchased on Handy Helpers?

24 A. Yes, the payment for this came out of the Handy Helper
25 account.

1 Q. And your assumption is based on this receipt that the
2 carpeting was installed at Ms. Bock's?

3 A. If you go to the next page, it says location of the
4 installation.

5 Q. Yes. Based on this, right, that those --

6 A. Yes.

7 Q. All right. But the money came from Handy Helpers
8 account, correct?

9 A. Yes.

10 Q. I believe you testified a little bit about the Wedding
11 Day Diamond.

12 A. Yes.

13 Q. And I want to just make sure what your testimony is.

14 A. Okay.

15 Q. Let's go to S48, the third page.

16 So, Ms. Mallet, could you call out the first third
17 so I can -- yeah, all the way down. No. All the way down.
18 Including the receipt.

19 So this is a purchase by Mr. Watson, correct?

20 A. Yes.

21 Q. It's not Ms. Bock, correct?

22 A. Correct.

23 Q. And what time frame is this?

24 A. The date is September, I think that says 3/2020.

25 Q. All right.

1 A. Oh, no. On the other side it is clearer. It says
2 September 2nd.

3 Q. September 2nd.

4 Ms. Mallet, could you highlight the date on the
5 left, the date of transaction on the left. The other left.
6 Yeah. Okay.

7 Trial Director is not that easy to operate, so I'm
8 not -- highlight the date of transaction, please.

9 Okay. This is September 2nd, 2020, this purchase
10 was made by Mr. Empress, correct -- Mr. Watson, correct?

11 A. Yes.

12 Q. But we don't know who the purchase was for?

13 A. No.

14 Q. Okay. So let's go to W46 again and go to page 67. Just
15 highlight -- I mean, call out the first third again.

16 Now, on January 22nd there's a \$3,000 withdrawal.
17 Do you know whether that was cash or a check?

18 A. I believe it was cash.

19 Q. All right. And do you have any information, do you have
20 information as to how that money was spent?

21 A. No.

22 Q. Again, it is Mr. Watson's account, correct?

23 A. Oh, was that a question? Yes, it's his account.

24 Q. So, Ms. Mallet, could you highlight the withdrawal
25 section.

1 So there's a series of withdrawals by Mr. Watson.

2 Do you see that?

3 A. Yes.

4 Q. And do you know personally whether those purchases were
5 from Ms. Bock?

6 A. No.

7 Q. Okay. Let's go to page 72 of the same exhibit, exhibit
8 I believe you testified to it. Call out the first third of
9 the transactions. Now highlight the withdrawals. All
10 right.

11 I want to talk a bit about February 2nd of this
12 exhibit, the Louis Vuitton purchase. Do you see that for
13 \$3,505?

14 A. Yes, on February 1st?

15 Q. I didn't know things were that expensive.

16 Was it purchased by cash or credit card?

17 A. This appears to be a debit card transaction.

18 Q. Withdrawal from Mr. Watson's account?

19 A. This was a withdrawal from Handy Helpers.

20 Q. Handy Helpers account. And the Louis Vuitton, I believe
21 there's a, is that the backpack? Is that the backpack,
22 Louis Vuitton?

23 A. If there was a Louis Vuitton backpack, and in the
24 photograph, he was holding two large bags from Louis
25 Vuitton. So there were other items.

1 Q. All right. And was that based on your investigation
2 those purchases from February 1st purchases?

3 A. Yes.

4 Q. And do you know who those purchases were for?

5 A. They were for likely Empress Watson because he's the one
6 that's seen wearing the backpack.

7 Q. Okay. Let's go to S51, page 22.

8 Well, before you go there, go back to the
9 beginning of the other page. I'm sorry.

10 You testified to this exhibit. What is it?

11 A. This is a grand jury subpoena production from Royalty
12 Exotic Cars.

13 Q. All right. So this -- go to page 22.

14 You testified about Mr. Watson renting a vehicle.
15 What is it, 27/2021?

16 A. Yes, January 27th to January 28th.

17 Q. Okay. And for how much?

18 A. \$2,297.74.

19 Q. Ms. Mallet, could you call out the middle half?

20 It was a credit card transaction, correct?

21 A. Yes. This was paid with his debit card.

22 Q. What's a debit card?

23 A. A debit card is a card that's tied directly to your bank
24 account, so the funds come directly from your account.

25 Q. And it was not Ms. Bock's account, was it?

1 A. That is Handy Helpers'.

2 Q. All right. Go to page 27.

3 Same thing?

4 A. Yes. This is a black Lamborghini instead of a green
5 one.

6 Q. Okay. Let's go to page 32.

7 Is this another transaction by Mr. Empress,
8 correct?

9 A. Yes.

10 Q. Ms. Mallet, could you call out the middle section, so we
11 make sure, for the benefit of the jury.

12 It's a car rental?

13 A. Yes.

14 Q. Not purchase?

15 A. No.

16 Q. Let's go back to W46. And go to page 72.

17 Again, W46 was a -- that's, you testified earlier,
18 that's Mr. Watson's Wells Fargo account, correct?

19 A. This is Handy Helpers' Wells Fargo account.

20 Q. I transposed. Handy Helper account, correct?

21 A. Yes.

22 Q. So I believe there's a series of purchases.

23 Ms. Mallet, is it possible to highlight, I mean,
24 call out just the withdrawal section? I'm going to test
25 your abilities here. There you go. Call that out. Enlarge

1 it a bit. All right.

2 So there's a series of withdrawals and you see the
3 \$3,505.93 purchase?

4 A. Yes.

5 Q. Withdrawal? And that is for the Louis Vuitton, correct?

6 A. Yes.

7 Q. And you testified earlier that Mr. Watson has photograph
8 holding onto the Louis Vuitton?

9 A. Yes.

10 Q. All right. So let's go to BB50. Just leaf through a
11 few pages. Continue. Next page 11 pages to it.

12 (Counsel confer)

13 MR. UDOIBOK: It's frozen.

14 MS. MALLET: Yeah, you can see the changes.

15 MR. UDOIBOK: No worries. I'll move on.

16 Are you able to call up page 5? There you go.

17 BY MR. UDOIBOK:

18 Q. This is a, the photograph of the Louis Vuitton bags.

19 Now you have it. Go to page 5. Go to 6. Go to
20 7. All right.

21 So this is a picture of the Louis Vuitton bags
22 supposedly purchased by Mr. Watson, correct?

23 A. Yes.

24 Q. Go to page 8, if it will come up. Page 9.

25 Is that a Louis Vuitton bag, backpack?

1 A. It appears to be, yes. It has the LV initials on it.

2 Q. And that's not Ms. Bock obviously.

3 Go to page 10 and 11. Okay.

4 Let's go back to W46, specifically page 80. I
5 believe you testified to that too.

6 There's a transfer on -- could you call out the
7 first -- there you go.

8 There's a deposit to Mr. Watson on March 19th?

9 A. Correct.

10 Q. Do you see that?

11 A. Yes.

12 Q. And the deposit presumably is from Feeding Our Future?

13 A. Correct.

14 Q. Okay.

15 A. There would be a check copy of the deposit --

16 Q. There you go.

17 A. -- later on in this exhibit.

18 Q. Go to S51 that you testified to, page 38. Next page.

19 There you go.

20 What was -- you testified that this was another
21 rental?

22 A. Yes.

23 Q. Correct? And by Mr. Watson, correct?

24 A. Correct. Aimee Bock was with him in the pictures.

25 Q. Yes, Aimee Bock was with him because they had a

1 relationship, correct?

2 A. Yeah, and they went on vacation together.

3 Q. They were vacationing together, correct?

4 A. Yeah.

5 Q. You testified and he represented a vehicle.

6 A. Yes.

7 Q. All right. Money is from Handy Helpers?

8 THE COURT: Counsel, may I have a sidebar, please.

9 **(Sidebar discussion)**

10 THE COURT: Mr. Udoibok, can you hear me?

11 MR. UDOIBOK: Yes.

12 THE COURT: We appear to be simply redoing the
13 direct. I don't understand it. I don't think it's helping
14 your client. The jury is confused as to what's happening.

15 If we're going to go through every item of
16 evidence, my guess is the government will stipulate that
17 these are not purchased directly by Ms. Bock. We need to
18 move along.

19 MR. UDOIBOK: Well, may I respond, Your Honor?

20 THE COURT: Yes, please.

21 MR. UDOIBOK: The reason I'm stating that is to
22 make the record clear that, one, Ms. Bock didn't have
23 control of the account. Number two, and the purchases were
24 made by, by Mr. Watson from an account he controlled.

25 THE COURT: I understand.

1 MR. UDOIBOK: The connection --

2 THE COURT: I think the jury gets it. We're just
3 in redundant territory.

4 MR. UDOIBOK: I'll try.

5 THE COURT: Just trying to move it along.

6 MR. UDOIBOK: All right. I'll try.

7 THE COURT: Thank you.

8 **(In open court)**

9 BY MR. UDOIBOK:

10 Q. So I understand your testimony. I don't want to go
11 through all the transactions.

12 You agree with me that all the transactions coming
13 out of the Handy Helpers checking account were performed by
14 Mr. Watson?

15 A. That is not a correct statement.

16 Q. All right. So let's go to S51 here. Call out that top
17 half, please.

18 This transaction was made by Mr. Watson, correct?

19 A. His name is listed on the receipt. It doesn't show that
20 on this page.

21 Q. All right. Go -- go to the next page, please, so we
22 will see. Go forward. Wait. Go back to, you know,
23 page 38.

24 Do you have information as to who made this
25 booking?

1 A. The information --

2 MR. THOMPSON: Objection, Your Honor. Asked and
3 answered.

4 THE COURT: Sustained.

5 BY MR. UDOIBOK:

6 Q. All right. Let's go to page 42.

7 Do you know who made this booking?

8 A. The name listed is Empress Watson.

9 Q. Thank you. I want to move on to a different category
10 here. We're still on W46. Go to page 112.

11 There's a \$10,000 transaction. Do you see that?

12 A. Yes.

13 Q. And is it a deposit?

14 A. It is a wire transfer into the account.

15 Q. And then the day before, what is that \$25,000 about?

16 A. The \$25,096.85 is the account balance.

17 Q. The account balance. All right. And again, it came
18 from Feeding Our Future?

19 A. The \$10,000 deposit is from Feeding Our Future --

20 Q. Okay.

21 A. -- as a wire transfer.

22 Q. All right. Go to BB41c.

23 You testified to the fact that this was a
24 conversation or a text message in between Ms. Bock and
25 Mr. Watson, right?

1 A. This was a Facebook Messenger post.

2 Q. All right. What was your impression about this
3 communication?

4 MR. THOMPSON: Objection. Relevance. Foundation.

5 THE COURT: Sustained.

6 BY MR. UDOIBOK:

7 Q. So go to the third paragraph. All right.

8 Could you read that?

9 A. "You have said a million times you were selling the
10 Nova, and it still sits in storage costing money every
11 month. Same with the Porsche. I bought a car that I don't
12 even know where it is or have a key to."

13 Q. Okay. So do you know, do you know which car Ms. Bock
14 was referring to?

15 A. She's talking about her Porsche in the second line. The
16 first one is a Chevy Nova.

17 Q. All right. It says, "You have said a million times you
18 were selling the Nova, and it still sits in the storage
19 costing money every month. Same with the Porsche."

20 All right. "I bought a car," do you know which
21 car they are referring to?

22 MR. THOMPSON: Objection. Asked and answered.

23 THE COURT: Overruled. You may answer.

24 THE WITNESS: I believe she's referring to the
25 Porsche.

1 BY MR. UDOIBOK:

2 Q. Okay. You believe she is referring to the Porsche?

3 A. Because the Porsche was later titled in Aimee Bock's
4 name.

5 Q. All right.

6 A. The Nova was not.

7 Q. All right. But my question, though, was: You don't
8 know which car they're referring to?

9 MR. THOMPSON: Objection. Asked and answered.

10 THE COURT: Sustained.

11 BY MR. UDOIBOK:

12 Q. Let's go to S57.

13 So this is the vehicle that you said Ms. Bock
14 purchased?

15 A. That is correct.

16 Q. All right. And for how much?

17 A. The title transfer document said \$9,000.

18 Q. Okay. Did you based on your investigation, do you know
19 the account the \$9,000 came from?

20 A. No.

21 Q. Okay. I want to talk a little bit about BB1. Go to
22 page 24.

23 So this is a Mercedes you testified to, correct?

24 A. That is correct.

25 Q. And whose Mercedes was it?

1 A. It was purchased by Empress Watson.

2 Q. Thank you.

3 Let's go to BB15. BB15.

4 MS. MALLET: It's not coming up.

5 MR. UDOIBOK: It's freezing? It should be there.

6 It's the purchase agreement.

7 BY MR. UDOIBOK:

8 Q. I believe you testified to -- I can't call it up now.

9 You testified to a purchase agreement, all right,
10 for the Mercedes, correct?

11 A. Yes.

12 Q. And that Mercedes was purchased still by Mr. Watson, not
13 Ms. Bock?

14 A. That is correct.

15 Q. And I didn't quite understand when counsel asked you,
16 and BB1 page -- when you were testifying to page 24, it says
17 the Mercedes was recovered. What does that mean?

18 A. That means we seized it.

19 Q. And was it ever returned?

20 A. No.

21 MR. UDOIBOK: I don't have any further questions.

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

23 CROSS-EXAMINATION

24 BY MR. MONTEZ:

25 Q. Good afternoon.

1 A. Good afternoon.

2 Q. My name is Adrian Montez. Along with Michael Colich, we
3 represent Salim Said.

4 I want to ask you about this business that you
5 mentioned earlier, Cosmopolitan Business Properties. Do you
6 remember testifying about that business?

7 A. Yes.

8 Q. And it's got a similar name to another company that
9 we've heard about earlier, Cosmopolitan Business Solutions;
10 is that true?

11 A. That's true.

12 Q. But these are actually two separate companies; is that
13 correct?

14 A. That is correct.

15 Q. Cosmopolitan Business Solutions was a company that
16 existed long before Cosmopolitan Business Properties, true?

17 A. That's true.

18 Q. Cosmopolitan Business Solutions is the entity that's
19 doing business as Safari Restaurant; is that correct?

20 A. That is correct.

21 Q. And we know that Salim Said is one of the owners of
22 Cosmopolitan Business Solutions, true?

23 A. That's true.

24 Q. And there's another owner, Abdulkadir Nur Salah, true?

25 A. That's true. He's also an owner.

1 Q. Now, Cosmopolitan Business Properties, this was an
2 entity that was created June 17th, 2021; is that correct?

3 A. Yes, from what I recall.

4 Q. Now as the name suggests, that company was later used to
5 purchase property; is that true?

6 A. Yes.

7 Q. There's four owners of that company; is that correct?

8 A. Of which one?

9 Q. Cosmopolitan Business Properties?

10 A. Yes.

11 Q. Abdulkadir Nur Salah, who we've already heard about,
12 correct?

13 A. Yep.

14 Q. And then Salim Said, correct?

15 A. Yes.

16 Q. And we also have Ahmed Ghedi, true?

17 A. Yes.

18 Q. And an Ahmed Omar-Hashim; is that correct?

19 A. That's correct.

20 Q. Do you know the relationship between Abdulkadir and Omar
21 Ahmed Omar-Hashim?

22 A. No, if -- you mean like related?

23 Q. Right.

24 A. No, I don't know.

25 Q. Okay. But that business, Cosmopolitan Business

1 Properties, does acquire an actual building at some point;
2 is that true?

3 A. Yes, it does.

4 Q. All right. Now I want to draw your attention to another
5 company that was created May 18th, 2021, Afrikan Village.

6 Do you recall testifying about African Village?

7 A. Yes, I do.

8 Q. This was another company that was also used to obtain
9 some property also; is that true?

10 A. Yes.

11 Q. Now that property was purchased in Columbus, Ohio; is
12 that correct?

13 A. Yes, it was.

14 Q. So I just want to clarify here. We have two companies
15 that are created, one in May of 2021 and one in June of
16 2021. Both of those properties, excuse me, both of those
17 companies, one of the owners is Salim Said.

18 A. Yes.

19 Q. And both of those companies are used to purchase
20 properties; is that true?

21 A. Yes.

22 MR. MONTEZ: Thank you. No further questions.

23 THE COURT: Mr. Thompson, any redirect?

24 MR. THOMPSON: Yes, Your Honor.

25

REDIRECT EXAMINATION

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BY MR. THOMPSON:

Q. Mr. Salim Said, he owned a restaurant, right? That was his primary business; is that right?

A. Yes.

Q. What was the name of that restaurant?

A. Safari Restaurant.

Q. And if I understand correctly, it closed during COVID, correct?

A. Yes.

Q. And it wasn't serving regular customers?

A. No, I don't believe so.

Q. What happened after that?

A. It enrolled to start participating in the Federal Child Nutrition Program.

Q. And in the next year and a half, how much property did Mr. Said and his partners purchase with the proceeds of their participation in the Federal Child Nutrition Program?

A. Millions.

Q. How many commercial properties did they purchase?

A. Two.

Q. Where were those located?

A. One in, on Park Avenue in Minneapolis and the other one in Columbus, Ohio on Stelzer Road.

Q. And between those two buildings, approximately how much

1 did they pay to purchase those two properties in
2 Minneapolis, Minnesota, and Columbus, Ohio?

3 A. I would say nearly 5 million.

4 Q. And how many meals would one have to serve to make
5 \$5 million in Federal Child Nutrition Program fund
6 reimbursements?

7 A. Close to 2 million meals.

8 Q. Okay. And it's a reimbursement program, correct?

9 A. It is.

10 Q. So if you serve 2 million meals first, you get your
11 \$5 million, and what are you supposed to do with it?

12 MR. MONTEZ: Objection, Your Honor. Outside the
13 scope.

14 THE COURT: Overruled.

15 BY MR. THOMPSON:

16 Q. How does the program work, Ms. Jansma?

17 A. The program works that facilities that serve food would
18 prepare food, serve the food to the kids, and then submit
19 the costs for preparing those meals to the Feeding Our
20 Future sponsor, in this scenario, for reimbursement for
21 their expenses for the food and the labor that it took to
22 prepare the food.

23 Q. Is it supposed to be lucrative?

24 A. No. It is a federally subsidized program. Typically
25 anything that's subsidized is not going to be profitable.

1 Q. Okay. In this case for Mr. Said, was it lucrative?

2 A. Very.

3 Q. Altogether how many properties did he purchase that year
4 and a half that he was in the program?

5 A. Well, he bought the million dollar home in Plymouth and
6 then two commercial properties.

7 Q. In Minneapolis and in Columbus, Ohio?

8 A. Yes.

9 Q. Okay. All right. So let's talk about Ms. Bock.

10 Counsel asked you some questions about this Handy
11 Helpers account. And if I understood the gist of the
12 questioning, it was suggesting that Ms. Bock herself neither
13 controlled the account nor benefited from it.

14 Was that what you took from the line of
15 questioning?

16 A. Yes.

17 Q. Do you agree with those assertions?

18 A. No.

19 Q. Why not?

20 A. Because Aimee Bock was signing checks drawn on the
21 account. She also initiated all the payroll transactions
22 that included money for Empress Watson's payroll.

23 Q. So all the funds that flowed into that account?

24 A. Correct.

25 Q. Where did they all come from?

1 A. Feeding Our Future.

2 Q. And the expenditures we saw, Mr. Udoibok went through
3 some of them, there were some travel, correct?

4 A. Yes.

5 Q. To Las Vegas?

6 A. Yes.

7 Q. Two trips, I believe?

8 A. Two trips for Aimee.

9 Q. Aimee and -- Ms. Bock and her boyfriend?

10 A. Right.

11 Q. And so she was there, correct?

12 A. Yes.

13 Q. Those photos we saw of her boyfriend with the
14 Lamborghinis and the Rolls Royce, who took those photos?

15 A. I believe it would be Aimee Bock because they were on
16 her phone.

17 Q. Okay. There was also some questions about Wedding Day
18 Jewelers, expenses, and Louis Vuitton handbags; is that
19 right?

20 A. Yes.

21 Q. I think you had a question -- you had an answer about
22 the Wedding Day Jewelers; is that correct?

23 A. Yes.

24 Q. What was your interpretation of who those jewelry
25 purchases were going to?

1 A. I presumed that they would be for Aimee Bock and not a
2 different female.

3 Q. I'm going to show you Government Exhibit Bb1, starting
4 at page 13. These are photos taken during the search of
5 Ms. Bock's residence; is that right?

6 A. Yes.

7 Q. On page 13 what do we see here?

8 A. The jewelry box.

9 Q. Page 14, what do we see?

10 A. More jewelry and the name Aimee on one of them.

11 Q. Page 14?

12 A. More jewelry. Gold jewelry, and it looks like there's
13 diamonds in there, too, and a watch.

14 Q. Okay. Mr. Udoibok also asked you questions about the
15 cash withdrawals from the account; is that right?

16 A. Yes.

17 Q. And describe the cash withdrawals that you saw. I know
18 you walked through some of them, both with Mr. Udoibok and
19 myself.

20 Was there a pattern to the deposits or the
21 transfers of funds from Feeding Our Future to Handy Helpers
22 and then the cash withdrawals from that account?

23 A. Yes. They were consistent. Every time a deposit would
24 come in from Feeding Our Future, a cash withdrawal would be
25 initiated.

1 Q. So if I understand correctly, Ms. Bock would transfer
2 money from Feeding Our Future to her live-in boyfriend's
3 LLC?

4 A. Yes.

5 Q. And then he would withdraw cash shortly thereafter?

6 A. Right.

7 Q. Consistently?

8 A. Yes.

9 Q. Thousands of dollars?

10 A. Over 200,000 total.

11 Q. I'm directing your attention back to Government
12 Exhibit BB1, at page 17. Was there cash found in Ms. Bock's
13 house?

14 A. Yes, there was.

15 Q. And at page 10 it looks like there's a -- what do you
16 see here in this drawer next to the bed?

17 A. There's a bunch of cash.

18 Q. How about on page 11?

19 A. Also more cash.

20 Q. Page 12?

21 A. Cash.

22 Q. I believe there was --

23 A. A Gucci bag.

24 Q. -- more than \$13,000 in cash recovered from her home?

25 A. Yes, that's correct.

1 Q. You said a bag as well?

2 A. Yeah.

3 Q. At page 18 what do we see?

4 A. That is a, consistent with a Louis Vuitton purse.

5 Q. Page 19?

6 A. An additional purse.

7 Q. Okay. Now, Mr. Udoibok asked you some questions about
8 Government Exhibit X24 as well, correct?

9 A. Yes.

10 Q. And one of the questions he asked was about the money
11 that was transferred to these other two accounts held by
12 Ms. Bock's boyfriend, correct?

13 A. Yes.

14 Q. Mr. Watson's personal accounts and an account called
15 Above All Classic Muscle Cars LLC.

16 A. Correct.

17 Q. Now just to be clear, Mr. Udoibok asked whether you
18 traced this money and whether you knew how it was spent.

19 A. Right.

20 Q. Did you?

21 A. Yes.

22 Q. Tell us what you did.

23 A. We obtained the bank accounts for both of those entities
24 and examined them to figure out what the funds were used
25 for.

1 Q. Okay. And you created a chart, correct?

2 A. Yes, there is a chart.

3 Q. And that's been admitted as Government Exhibit X53?

4 A. Yes.

5 Q. And what are we looking at here at Government
6 Exhibit X53?

7 A. This is Empress M. Watson, Jr.'s, Wells Fargo checking
8 account.

9 Q. Okay. And tell us how much money was deposited into it
10 from November 2019 through February 2022.

11 A. The total deposits were \$268,105.89.

12 Q. And where did that money come from?

13 A. \$139,149.67 came from Handy Helpers LLC and Empress
14 Watson, Jr.'s, other account. And then \$124,530 was from
15 Feeding Our Future for payroll, and then also for as
16 indicated on the transfer, handyman or Handy Helpers for the
17 45,100.

18 Q. Okay. So the Handy Helpers money, that all came from
19 Feeding Our Future, correct?

20 A. Yes.

21 Q. One step away. And then he was also on the payroll at
22 Feeding Our Future?

23 A. He was.

24 Q. Can you explain that because I know Mr. Udoibok asked
25 you some questions about what, if anything, Mr. Watson did

1 to earn these nearly \$900,000 in payments from Feeding Our
2 Future.

3 A. Yeah. So he was put on payroll, I believe it was in
4 September of 2021 --

5 Q. And he --

6 A. -- on Feeding Our Future's account.

7 Q. And he received regular paychecks?

8 A. He did. And according to the ADB records, it was for
9 40 hours' worth of work. His rate of pay started out at \$33
10 per hour and was later increased to \$44 per hour.

11 Q. And that's in addition to the payments to Handy Helpers?

12 A. Yes, the Handy Helper, payments to the LLC continued.

13 Q. Looks like there's also \$45,000 in payments deposited
14 from Feeding Our Future into Mr. Watson's personal account
15 that are labeled "Feeding Our Future handyman services"?

16 A. Yes. Those started in November of 2019 was the smaller
17 amount, and then continued through March of 2020, when the
18 new account was opened for Handy Helpers LLC.

19 Q. Okay. All right. So I want to come back to that in a
20 second, but before I do, you looked into how Mr. Watson
21 spent the money that he transferred either from Handy
22 Helpers or from Feeding Our Future into his personal
23 accounts.

24 A. Yes.

25 Q. What did you find?

1 A. That it was all personal related type expenses, you
2 know, eating out, going to the smoke shops, paying to have
3 car stereos installed in his car, shopping, travel.

4 Q. Okay. Not handyman stuff, I take it.

5 A. No.

6 Q. Nothing to do with Feeding Our Future?

7 A. Not as far as I could tell.

8 Q. Okay. All right. I want to put this on the screen
9 here, because I want to just make clear here, we have Handy
10 Helpers, which got \$878,000 from Feeding Our Future,
11 correct?

12 A. That's correct.

13 Q. And some portion of that was paid over to Mr. Watson's
14 personal accounts, correct?

15 A. Yes.

16 Q. About 123,000 worth?

17 A. Yep.

18 Q. These other payments from Feeding Our Future, are they
19 in addition to or separate from the money paid by Feeding
20 Our Future to Handy Helpers?

21 A. Yes.

22 Q. Can you explain that?

23 A. The payments to Handy Helpers LLC were all direct
24 payments and typically \$10,000 each time, sometimes 15,000
25 or more.

1 And these payments, the Feeding Our Future
2 employee payroll, that is actually just the net deposits
3 into his bank accounts. So it's after the federal taxes,
4 Social Security, Medicare and all those withholdings have
5 been taken out.

6 Q. Okay. So I want to do some math here, if you will bear
7 with me.

8 A. Okay.

9 Q. That number is 878,000 --

10 A. Yes.

11 Q. -- \$513 from Feeding Our Future to Empress Watson; is
12 that right?

13 A. Yes.

14 Q. Okay. That's accurate?

15 A. Correct.

16 Q. And then how much does he receive from Feeding Our
17 Future separate and apart from that money paid to Handy
18 Helpers?

19 A. \$124,530.26.

20 Q. Is that accurate?

21 A. Yes.

22 Q. So that's in addition to the \$878,000 that Ms. Bock paid
23 to his company Handy Helpers?

24 A. Yes.

25 Q. All right. It's a lot of math for me. I'm not a

1 forensic accountant, but let's see if we can do this. Okay.

2 Is that accurate?

3 A. That is the math.

4 Q. How much money did Aimee Bock pay to her live-in
5 boyfriend Empress Watson?

6 A. Over a million dollars.

7 Q. And exactly how much?

8 A. That is \$1,003,043.

9 Q. (Indicating); is that right?

10 A. Yes.

11 Q. All right. Now that \$1,003,043 that Ms. Bock paid to
12 her live-in boyfriend Empress Watson, where did all that
13 money originate?

14 A. At Feeding Our Future.

15 Q. And specifically?

16 A. Federal Child Nutrition Program funds.

17 Q. All of it?

18 A. All of it.

19 Q. Is that accurate (indicating)?

20 A. That is accurate.

21 Q. Now, I'm going to mark this as Government Exhibit X100.

22 Ms. Jansma, as a forensic accountant, does
23 Government Exhibit X100 accurately summarize the total
24 amount of Federal Child Nutrition Program funds that Aimee
25 Bock gave to her live-in boyfriend Empress Watson?

1 A. Yes, it does.

2 MR. THOMPSON: Your Honor, I move to admit
3 Government Exhibit X100.

4 THE COURT: Any objection?

5 MR. UDOIBOK: No objection.

6 MR. MONTEZ: No objection.

7 MR. THOMPSON: No further questions, Your Honor.

8 THE COURT: X100 is admitted. Thank you.

9 Any recross, Mr. Udoibok?

10 MR. UDOIBOK: Yes, Your Honor.

11 RECROSS-EXAMINATION

12 BY MR. UDOIBOK:

13 Q. I just want to understand what your testimony is.

14 Regarding Exhibit 100, X100 -- I think it calls for a yes or
15 no answer.

16 Is it your testimony that Mr. Watson performed no
17 function for Feeding Our Future in exchange for the payment?

18 A. I do not know what he did in the office.

19 MR. UDOIBOK: Thank you.

20 THE COURT: Mr. Montez?

21 MR. MONTEZ: No, Your Honor. Thank you.

22 THE COURT: Mr. Thompson?

23 I am sorry. You don't have anything, do you?

24 MR. THOMPSON: No, Your Honor.

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

1 MR. COLICH: Your Honor, may we have a sidebar?

2 THE COURT: You may have a brief sidebar.

3 **(Sidebar discussion)**

4 THE COURT: Mr. Colich.

5 MR. COLICH: Your Honor, I apologize. Mr. Salim
6 is very anxious here wondering if he will be allowed to pray
7 today. I understand it's at --

8 THE COURT: It's at 3:35, 3:34 today.

9 MR. COLICH: That's right.

10 THE COURT: I got it.

11 MR. COLICH: Thank you.

12 **(In open court)**

13 THE COURT: Mr. Thompson. Your next witness.

14 MR. THOMPSON: Your Honor, the government rests
15 its case.

16 THE COURT: Thank you.

17 Members of the jury, I'm going to give you an
18 afternoon break, and we're going to come back. We're going
19 to come back, because we need to take care of some legal
20 matters, I'm going to have you come back at 3:40.

21 All rise for the jury.

22 **IN OPEN COURT**

23 **(JURY NOT PRESENT)**

24 2:59 p.m.

25 THE COURT: You may all be seated.

1 The government has now rested its case. At this
2 time, I'll take any motions, and also I want some inquiry
3 into testimony of defendants.

4 Mr. Udoibok.

5 MR. UDOIBOK: Yes, Your Honor.

6 May I?

7 THE COURT: Yes, please.

8 MR. UDOIBOK: I'm sure the Court anticipates this
9 motion.

10 In my practice, I almost always bring a motion for
11 judgment of acquittal, but this one is a little special. It
12 is special because after four weeks of trial, the evidence
13 presented against Ms. Bock doesn't rise up to the level of
14 even circumstantial. And I'll put it in boxes.

15 The first box is the conspiracy, the conspiracy
16 charge, which -- just a second, Your Honor. I left my chart
17 in the office.

18 So we have the conspiracy charge. The government
19 has yet to --

20 THE COURT: Wait. I'm sorry. I don't want to
21 interfere, but I do need to know which conspiracy charge you
22 are talking about.

23 MR. UDOIBOK: The first count. I have my cheat
24 sheet. Yes, I have it.

25 So there's a Count 1 wire fraud conspiracy that

1 Ms. Bock and Mr. Salim Said conspired to commit wire fraud.
2 Well, as far as we're concerned, the government yet has not
3 produced the causal link between Mr. Said and Ms. Bock to
4 commit wire fraud.

5 The evidence submitted by the government is that
6 somehow the submission of site ID applications and site
7 applications to MDE rises to the level of conspiracy on
8 behalf of the Safari group of the defendants, which includes
9 Mr. Said.

10 The issue is that the site applications were
11 approved. The site ID applications were approved. And the
12 agreement between the site ID application and site
13 applications, the result of the applications were consistent
14 with what was agreed upon.

15 So that's one, that's one hurdle that the
16 government has not established that whatever happened
17 between the owners of Safari or even Mr. Said, that there
18 was an agreement between the two defendants to violate the
19 law.

20 Now, then there's another category, the wire fraud
21 itself, which is also the site applications. Each of those
22 were approved by MDE. One cannot violate a law that was
23 already approved. The conduct cannot violate a law that is
24 lawful.

25 We argued this during our pretrial. Then that's

1 the conspiracy and the fraud, the wire fraud charge.

2 Then we'll go to the conspiracy to commit the
3 programs bribery. Again, the government fails. The vehicle
4 for the bribery charge are a couple of things.

5 One that started off in this case looming large is
6 a \$310,000 sale of the child care center and supposedly the
7 moneys, the 10 percent, that the Feeding Our Future received
8 from the site and the allegations that in exchange for
9 participation in the nutrition programs that Ms. Bock
10 demanded some money.

11 And all of those I believe fail. The hangman is
12 on the evidence that is very stubborn. And history cannot
13 be rewritten just because we have a trial.

14 The fact, the facts show, the evidence show that,
15 one, the child care center predated even the participation
16 in the, in the COVID program, the food program.

17 Secondly, the School Age Consultant, School Age
18 Consultant book manual or book, the government produced text
19 messaging between Ms. Bock and Mr. Watson saying she was
20 going to make about \$78,000 or something to that effect for
21 the sale of the book.

22 Well, the government evidence itself shows that
23 that was a registered, legitimate business and those moneys,
24 \$2,800, routinely paid by all. And I believe Mr. Hussein,
25 Mohamed Hussein, testified that he had not been a part of

1 the program when he was asked to donate.

2 And if you look at the evidence, this is by the
3 government -- I can't cite it off the top of my head. The
4 checks, the \$2,800 checks, were either for policy manual or
5 for donation. That doesn't rise to the level of bribery.

6 So and then Count 40 also is based on the same
7 narrative, and the government hasn't met its burden. It's a
8 high burden. For one to be convicted of federal programs
9 bribery when, one, the intent is not shown, the agreement is
10 not shown, knowledge is not even shown, this is whole case
11 is about color.

12 By that I mean I'm not saying racial color. It's
13 flamboyancy. It's about Empress Watson, who is not a
14 defendant, and his conduct attributable to Ms. Bock.

15 It's about some personalities who have come before
16 this court and pled guilty to participating in significant
17 fraudulent activity. I get the sense that someone has to be
18 blamed, and it's Ms. Bock.

19 The argument may be she's not a good manager. The
20 argument may be that she, she grew the, Feeding Our Future
21 grew too much and she doesn't have the competence. That's
22 not a crime. It could be negligence. It could even be
23 breach of fiduciary duty. But it's not a crime.

24 And so this court must enter judgment of acquittal
25 on behalf of Ms. Bock. Thank you.

1 THE COURT: Thank you.

2 Mr. Colich or Mr. Montez.

3 MR. MONTEZ: Thank you, Your Honor.

4 On behalf of Mr. Salim Said, the defense is making
5 a motion for a judgment of acquittal pursuant to Federal
6 Rules of Criminal Procedure Rule 29.

7 Particularly as it pertains to Count 1, the
8 conspiracy to commit wire fraud, the government has not
9 presented any evidence that Mr. Said spoke to Aimee Bock,
10 agreed to anything directly with Aimee Bock or anybody else
11 that's listed under Count 1 to participate fraudulently in
12 this program when he signed up to participate in the
13 program.

14 What the government has presented evidence of is
15 that perhaps fraud was taking place at other sites. They
16 have had individuals come in and say we knew what we were
17 doing was fraudulent. But what the government has not done
18 is presented evidence that Mr. Said agreed to do that with
19 anybody directly before he entered into the program.

20 So a conspiracy would need to take place before
21 something happens. And if he doesn't agree to that before
22 he enters into the program, there's no conspiracy.

23 As it pertains to the wire fraud counts, there's
24 an email sent from Ms. Bock to MDE applying for the ASA
25 Limited site. There is no indication, at least from what

1 I've seen of the evidence, that there was an agreement by
2 Mr. Said to fraudulently submit claims from the ASA Limited
3 site in furtherance of a crime.

4 In fact, the meal sheets that we've seen from ASA,
5 I have not seen a single one signed by Mr. Said, not a
6 single meal sheet.

7 As it pertains to the email regarding for-profit
8 restaurant clarifications, there has been no evidence
9 presented that Mr. Said even knew that this email was sent.
10 There's been no evidence presented that he wanted that email
11 to be sent.

12 There's no indication that he acquiesced in that
13 email being sent, that he was looking for clarification,
14 that he knew Ms. Bock was looking for clarification. There
15 has been no evidence of that presented.

16 As it pertains to Count 8, Mr. Said submitting
17 February summer meal counts for Safari Restaurant, there's
18 been evidence presented by the government that witnesses
19 believe these meal counts to be fraudulent on their face,
20 that the numbers are outrageous on their face.

21 There's been testimony about the population of
22 Minneapolis. But there hasn't been any direct evidence that
23 these meals were not being served. There has been arguments
24 that these meals were not being served, but there has not
25 been any direct evidence that these meals were not being

1 served.

2 Finally, as it pertains to Count 12, an email from
3 Abdihakim Ahmed to Aimee Bock with a purported fake roster,
4 as was elicited during testimony the purported roster was
5 discussed between two individuals prior to that roster even
6 being -- and not even the roster, the names being sent to
7 Mr. Said.

8 After that, Abdihakim Ahmed, the evidence that was
9 presented by the government, then sent the email to Ms. Bock
10 containing the fraudulent meal counts. There's no evidence
11 that's been presented that Mr. Said knew about that roster
12 at all, that the meals were fake, that the roster was fake.

13 As it pertains to bribery Your Honor. With the
14 recent law of *United States versus Snyder*, there has to be
15 an agreement to do an illegal action before the actions are
16 done. You cannot later on agree to do something. That
17 agreement at least has to take place before the actions are
18 done.

19 Mr. Said signs up for this program in April of
20 2020. In order for the bribery counts, which we've all
21 heard as being kickbacks in this case, there had to have
22 been an agreement in April of 2020 that Mr. Said was going
23 to pay kickbacks for his participation in the program.

24 Other witnesses have testified that that's what
25 those payments were for, but there's been no direct evidence

1 that Mr. Said made any sort of agreement with anybody at MDE
2 to pay kickbacks. There's been no evidence presented that
3 Mr. Said met with Eidleh and agreed to pay him kickbacks in
4 April of 2020. Because of that, those counts cannot stand.

5 As for the money laundering counts, Your Honor, in
6 order to launder money, you have to do it with the intent to
7 do so and know that the money that's being laundered was
8 obtained illegally.

9 There's circumstantial evidence that has been
10 offered by the government that perhaps some individuals knew
11 that this money was illegally obtained. There's been direct
12 evidence from different sites that they knew the money was
13 being illegally obtained.

14 But there's no evidence that's been directed that
15 Mr. Said -- that has been presented that Mr. Said knew he
16 couldn't make a profit, that the money that he was taking
17 were for fraudulent meal counts, and that he intended by
18 purchasing property to conceal that evidence, to conceal
19 that money.

20 So because of that, I would ask that the money
21 laundering counts be dismissed and that he be acquitted on
22 those count as well.

23 THE COURT: Thank you.

24 Does the government wish to respond?

25 MR. THOMPSON: I'm happy, Your Honor, if the court

1 wants me to do that.

2 THE COURT: You can do that or rest on the record.
3 Either.

4 MR. THOMPSON: We will rest on the record, Your
5 Honor.

6 THE COURT: Having anticipated these Rule 29
7 motions, I've considered all of the evidence presented by
8 the government, and I've also considered the law governing
9 each of the charges.

10 And the court has concluded after careful
11 consideration that the evidence is sufficient to sustain a
12 conviction on all of the counts of the indictment brought
13 against Ms. Bock and Mr. Said, and the motions are denied.

14 We are ready for the defense case.

15 Mr. Udoibok, do you wish to question your client
16 about whether she's going to take the stand, or do you have
17 another witness first?

18 MR. UDOIBOK: Your Honor, we call, we'll call
19 Ms. Bock.

20 THE COURT: All right.

21 Ms. Bock, you understand that you have the
22 absolute right under the Constitution to remain silent and
23 not to take the stand. Do you understand that?

24 DEFENDANT AIMEE BOCK: Yes.

25 THE COURT: The decision on whether to take the

1 stand or not is yours and yours alone. Your attorney can
2 give you advice on that, and you may listen or not listen to
3 your attorney as you wish, but it is your decision whether
4 to take the stand.

5 Do you know that?

6 DEFENDANT AIMEE BOCK: I do.

7 THE COURT: Okay. And if you remain silent, if
8 you wish, I will tell the jury that they cannot take your
9 silence into account when considering whether you've been
10 proven guilty on the counts against you.

11 Do you understand that?

12 DEFENDANT AIMEE BOCK: I do.

13 THE COURT: That's a right guaranteed by the
14 Constitution, and it would be a right that you'd be giving
15 up if you took the stand.

16 Do you understand that?

17 DEFENDANT AIMEE BOCK: I do.

18 THE COURT: Have you had enough time to talk with
19 your attorney about the decision that you are making here
20 today?

21 DEFENDANT AIMEE BOCK: Yes.

22 THE COURT: Do you have a clear head today?

23 DEFENDANT AIMEE BOCK: I do.

24 THE COURT: Are you under the influence of any
25 drugs or alcohol?

1 DEFENDANT AIMEE BOCK: Just my prescription meds.

2 THE COURT: Okay. And do those enable you to
3 think clearly?

4 DEFENDANT AIMEE BOCK: Yes.

5 THE COURT: All right. And so it's your decision
6 to take the stand and give up your right to remain silent.
7 Am I right about that?

8 DEFENDANT AIMEE BOCK: You are.

9 THE COURT: Okay. Then that is what we will do
10 when we come back.

11 I think given that, I don't think I need to
12 question you, Mr. Colich or Mr. Montez, about Mr. Said. You
13 can have until Wednesday to make your own decision about
14 that.

15 But let's just be clear that let's be ready by
16 Wednesday to make that decision in the event that we get to
17 your case. All right?

18 Okay. With that, I'll give you all a 15-minute
19 break and we will come back at 3:35. Fair? All right.

20 MR. MONTEZ: Is 3:40 okay, Your Honor?

21 THE COURT: I'm sorry?

22 MR. MONTEZ: 3:40?

23 THE COURT: Yes, that's fine.

24 (Recess taken at 3:19 p.m. till 3:43 p.m.)

25

1 3:43 p.m.

2 **IN OPEN COURT**

3 **(JURY PRESENT)**

4 THE COURT: You may all be seated.

5 And, Mr. Udoibok, you may call your first witness.

6 MR. UDOIBOK: Your Honor, the defense calls Aimee
7 Marie Bock.

8 THE COURT: Ms. Bock, you may come forward.

9 AIMEE BOCK,

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

12 THE WITNESS: I do.

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

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

16 THE WITNESS: My name is Aimee Bock. A-I-M-E-E.
17 Last name B-O-C-K.

18 THE COURT: Thank you.

19 Mr. Udoibok, you may inquire.

20 MR. UDOIBOK: Thank you, Your Honor.

21 DIRECT EXAMINATION

22 BY MR. UDOIBOK:

23 Q. Ms. Bock, this is the time to speak to the court and the
24 jury.

25 A. It is.

1 Q. So let's start first, how old are you?

2 A. 44.

3 Q. And where did you grow up?

4 A. I grew up in Cottage Grove, Minnesota.

5 Q. Where do you live now?

6 A. Cottage Grove, Minnesota.

7 Q. Who do you live with?

8 A. My parents.

9 Q. And who else lives with you?

10 A. It's myself, my mom, my dad, and my -- well, one of my
11 sons. My oldest is off at college, so he's there when he
12 comes home.

13 Q. So I assume you are educated.

14 A. I am.

15 Q. Where did you go to high school?

16 A. Park in Cottage Grove.

17 Q. Did you good to college?

18 A. I did.

19 Q. Where?

20 A. University of Minnesota in Duluth.

21 Q. What did you go to college for?

22 A. I majored in elementary education with a minor in social
23 studies.

24 Q. About when did you graduate?

25 A. Long time ago. 2003.

1 Q. I'm sorry I have to age you here.

2 When you graduated college, did you work in the
3 field of study you went for in college?

4 A. As much as I could. I stayed in Duluth after
5 graduating, and so I substitute taught there.

6 Q. Did you work in nonprofits after college?

7 A. I did.

8 Q. How long?

9 A. I've worked in nonprofit sector for probably 10 or
10 11 years now.

11 Q. So before you went into nonprofits, what was your area
12 of employment?

13 A. I had worked at a child care center, a daycare center.

14 Q. For how long?

15 A. About five or six years, five years.

16 Q. And then you went to nonprofit. What type of nonprofit
17 did you go into?

18 A. So I went to an organization, it's called Minnesota
19 Association For the Education of Young Children. It was a
20 Greater Twin Cities United Way funded project.

21 Q. How long did you work there?

22 A. I was there for about two and a half years, till the
23 project ended.

24 Q. What was your, you know, job duties in that
25 organization?

1 A. Yeah. So we were funded by, like I said, Greater Twin
2 Cities United Way to improve the quality of child care
3 centers in the nine-county metro.

4 Q. And I forgot already. Did you say how years you worked
5 there?

6 A. I believe it was about two and a half.

7 Q. All right. And then after that where did you go?

8 A. After that I went to Providers Choice, a food program
9 sponsor.

10 Q. What did you say, "food program sponsor"?

11 A. Correct.

12 Q. In what capacity did you work there?

13 A. I was in charge of the child care center.

14 Q. Which means what?

15 A. It means that I would work with local child care
16 centers, educate them on the food program, help them sign
17 up.

18 Q. For the food program?

19 A. For the food program.

20 Q. Then at some point did you continue to work in the food
21 program?

22 A. I did.

23 Q. Where did you go from there?

24 A. From there I went to an organization called Partners in
25 Nutrition.

1 Q. How long were you there?

2 A. Maybe two or three years, two years.

3 Q. And then you transitioned from Partners in Nutrition to
4 where?

5 A. To Feeding Our Future.

6 Q. So let's talk about how you went into Feeding Our
7 Future.

8 A. Okay.

9 Q. All right. About what time did you go to Feeding Our
10 Future?

11 A. 2018.

12 Q. Why?

13 A. Because I enjoyed working with the programs in the state
14 and had some differences with the other organization.

15 Q. All right. We're looking at what has been marked as
16 Government Exhibit 1. It's already in evidence.

17 Ms. Mallet, would you call up A1, please.

18 Is this a Certificate of Incorporation?

19 A. Yes, it is.

20 Q. When did you do this?

21 A. It was registered on November 7th of 2016.

22 Q. And the organization is called what?

23 A. Feeding Our Future.

24 Q. Ms. Mallet, would you call out, call out the name of the
25 organization.

1 Feeding Our Future? So at some point, though, did
2 you --

3 (Counsel confer)

4 MR. UDOIBOK: I'm sorry, Your Honor. A1 is not in
5 evidence.

6 Defense would offer Government Exhibit A1.

7 THE COURT: Thank you for catching that.

8 Any objection?

9 MR. THOMPSON: No objection, Your Honor.

10 THE COURT: A1 is admitted.

11 BY MR. UDOIBOK:

12 Q. Did you register Feeding Our Future with the IRS?

13 A. Yes.

14 Q. Why?

15 A. To get an employee identification number and receive a
16 nonprofit status.

17 Q. You are looking at what has been marked as
18 Exhibit D1-913. It's not in evidence.

19 D1-913. What is it?

20 A. This is the letter from the IRS issuing the employer
21 identification number, as well as notifying Feeding Our
22 Future that it had been approved as a nonprofit.

23 Q. Is this a copy of the letter you received from the IRS?

24 A. Yes, it is.

25 MR. UDOIBOK: Your Honor, defense offer D1-913

1 into evidence.

2 MR. THOMPSON: No objection.

3 THE COURT: D1-913 is admitted.

4 BY MR. UDOIBOK:

5 Q. Ms. Mallet, would you call out the first identification,
6 employee identification number, please.

7 What is the employer identification number given
8 to you by the Internal Revenue Service?

9 A. The number is 81-4343304.

10 Q. Is that the number that you continued to use in the
11 operation of Feeding Our Future?

12 A. Yes, it is.

13 Q. All right. Ms. Mallet, would you call out the first two
14 lines of the letter.

15 Is this the letter, part of the letter that you
16 received from the IRS?

17 A. Yes, it is.

18 Q. Could you read that first sentence?

19 A. "We are pleased to tell you we determined you're exempt
20 from federal income tax under Internal Revenue Code
21 Section 501c3."

22 Q. All right. Was there any time during your operation of
23 Feeding Our Future that you needed to reconfirm the status
24 of Feeding Our Future with IRS?

25 A. Can you rephrase?

1 Q. I will try.

2 Well, during your employment with Feeding Our
3 Future, did you always have a nonprofit status?

4 A. Yes, we did.

5 Q. We're looking at what has been marked as Exhibit D1-517.
6 It's not in evidence.

7 What is it?

8 A. It is another letter from the IRS.

9 MR. UDOIBOK: Your Honor, we offer D1-517.

10 THE COURT: Any objection?

11 MR. THOMPSON: No objection.

12 THE COURT: D1-517 is admitted.

13 BY MR. UDOIBOK:

14 Q. This letter is written when?

15 A. It's dated March 22nd, 2022.

16 Q. Ms. Mallet, could you call out the first half, first
17 quarter, rather. Could you highlight the date, please.
18 There you go.

19 This date is what?

20 A. March 22nd, 2022.

21 Q. Ms. Mallet, highlight, call out the first two sentences
22 of the letter.

23 What is that?

24 A. "We're responding to your request dated May 4th, 2021,
25 about your tax exempt status. We issued you a determination

1 letter in February 2017, recognizing you as a tax exempt
2 under Internal Revenue Code Section 501c3."

3 Q. All right. Thank you.

4 So I'd like to talk to you about Feeding Our
5 Future a little bit.

6 A. Okay.

7 Q. So when you formed Feeding Our Future, what was your
8 purpose of forming that organization?

9 A. Originally we were taking feedback from the Department
10 of Education and creating a sponsorship.

11 Q. All right. And explain what sponsorship is.

12 A. Sponsorship is, we're sort of in the middle between the
13 state agency, the Department of Education, and local
14 programs.

15 Q. So when you first started, when you first formed Feeding
16 Our Future -- by the way, I want to get some clarity.

17 Did you own Feeding Our Future?

18 A. No.

19 Q. Why do you say that?

20 A. Nonprofits are not owned by anyone.

21 Q. And what was your position?

22 A. I was the executive director.

23 Q. So I want to direct you to Government Exhibit A3. I
24 believe it's in evidence.

25 MR. THOMPSON: Yes.

1 BY MR. UDOIBOK:

2 Q. Do you recognize this? There's been testimony about A3,
3 correct?

4 A. Correct.

5 Q. And, Ms. Mallet, is it possible to call out as much as
6 you can, just so the jury would see. It seems very busy.
7 There you go.

8 Okay. Do you know when this organization,
9 organizational chart was formed?

10 A. It would be, from based on the employees, end of 2020,
11 maybe beginning of '21.

12 Q. So there's been testimony about some of your board of
13 directors, right?

14 A. There has.

15 Q. We will get to that later. Could you describe what the
16 top row in this chart is?

17 A. The top row would represent the board.

18 Q. All right. And the second row is what?

19 A. Is myself, as well as a compliance manager.

20 Q. Ms. Mallet, could you call out the second row with
21 Ms. Bock. That box. There you go.

22 So you were the executive director, correct?

23 A. Correct.

24 Q. And then this chart says there's a compliance manager.

25 Do you see that?

1 A. I do.

2 Q. Was there a compliance manager at Feeding Our Future?

3 A. There was not.

4 Q. So why is Mr. Watson's {sic} name on the chart?

5 A. There was submitted to MDE for approval to have a
6 compliance manager, but that request was denied.

7 Q. All right. Let's go to the third box. Could you
8 highlight the third box, please.

9 What is that?

10 A. That is the management staff.

11 Q. So at Feeding Our Future, you have management staff.
12 From this box, how many do you have?

13 A. At that time, the compliance specialist, like I said,
14 was denied. So there would have been two managers with a
15 third position open.

16 Q. Let's talk about the denial. Why did you need to submit
17 an organizational chart to MDE? By "MDE" I mean Minnesota
18 Department of Education.

19 A. So we're required every year to submit all of our
20 documentation to them.

21 Q. Okay. By "them" you mean?

22 A. MDE.

23 Q. MDE?

24 A. Sorry.

25 Q. So let's take the director of operations. What position

1 is that?

2 A. That was the position that would oversee the -- sorry.
3 I'm trying to see the -- oversee the office staff and help
4 guide them on their responsibilities.

5 Q. All right. It says "TBD" on that chart. So at that
6 time you didn't have a director, operations director?

7 A. Correct.

8 Q. All right. Go to the next one.

9 What position is that?

10 A. It's the program support manager.

11 Q. And whose name is listed there?

12 A. Abdikerm Eidleh.

13 Q. All right. And based on this case, who is Abdikerm
14 Eidleh?

15 A. A horrible person.

16 Q. What?

17 A. A horrible person. I don't --

18 Q. All right.

19 A. He's a former consultant.

20 Q. All right. So call out Abdikerm Eidleh's box again.

21 What was the responsibility of the program support
22 manager?

23 A. So they oversaw our program support staff, which were
24 the employees that would go out and work with the sites
25 directly. They would do the monitoring visits and train

1 them.

2 Q. Let's go to the next box. What is that?

3 A. It's the food program manager.

4 Q. And you have a person called Cole Flynn, correct?

5 A. Correct.

6 Q. Now what was the duty or duties of the food program
7 manager?

8 A. So this time they oversaw our claims staff as well as
9 our coordinators.

10 Q. So what does that mean? What's the difference between a
11 claims staff and a coordinator?

12 A. The coordinator is the staff member that would work kind
13 of in between the claims department and the site support
14 staff. So they would help fill any holes in missing
15 paperwork or be the person at the office that the site would
16 come and meet with.

17 Q. All right. When you mean "site," I mean, who are you
18 referring to when you say "site"?

19 A. So site can be a number of different organizations,
20 child care centers, adult daycares, emergency shelters,
21 after-school programs.

22 Q. All right. Go to the next box.

23 So there's a compliance specialist; is that right?

24 A. Yeah. That was denied when the compliance manager
25 position was denied.

1 Q. So what would have been the responsibility of a
2 compliance specialist?

3 A. They would have been available to help support any
4 questions that came up, any concerns we had with sites,
5 claims, regulations.

6 Q. What was the reason that the compliance specialist was
7 denied?

8 A. We were never really clear on that. MDE took issue with
9 the fact that it would be an attorney helping us, seemed to
10 be the main problem.

11 Q. Okay. So let's go to the next category.

12 So those top four, were you considered to be
13 managers?

14 A. Correct.

15 Q. All right. And then the top two, you considered to be
16 what? Directors.

17 A. Yes.

18 Q. All right. And then the top four are the, would be the
19 board.

20 A. Yes.

21 Q. All right. So now there are more personalities, now,
22 more boxes in the third, fourth quarter.

23 Ms. Mallet, could you call out those, so at least
24 we know what they are.

25 Now, the first one is what?

1 A. An office administrator.

2 Q. And what's that person's responsibility?

3 A. That person would help track the paperwork from the
4 locations.

5 Q. "Paperwork from the location," what do you mean by?

6 A. Yes. Sorry. So from the sites, every year there's
7 documentation that they have to fill out annually. They
8 would review the claim once it had been paid, put all the
9 documents in a specific order, scan it, file it.

10 Q. Now what about the site coordinator that is next to the
11 office administrator?

12 A. Yeah, so that, like I said, is similar to the food
13 program coordinator. This was earlier in the operations,
14 but they were the ones that were the office-based staff that
15 helped the sites when they either came to the office or
16 coordinated and worked with the support staff to get
17 information that was needed.

18 Q. Okay. What is the difference between the site
19 coordinator and program support staff?

20 A. It ended up turning into the same position.

21 Q. Oh. So you had program support staff, three positions,
22 or four from this organizational chart, right?

23 A. I misspoke. I am sorry. The site coordinator turned
24 into the food program coordinator, not the program support
25 staff.

1 Q. All right. So what does the food program coordinator do
2 then?

3 A. They are the ones that are the office-based employees.

4 Q. I was curious about a registered dietician. Did you
5 have one at Feeding Our Future?

6 A. We did not.

7 Q. Did you request for one?

8 A. We attempted to hire one. There's not a lot of
9 individuals in that field that we could locate.

10 Q. Why did you want one?

11 A. To help review menus, plan meals and help make sure that
12 the sites, different programs are serving the high quality
13 food.

14 Q. Is there any significance why you have the office
15 administrator as well as the site coordinator at the same
16 level in the organizational chart?

17 A. Because they functioned kind of in coordination with
18 each other. There was a partnership. There wasn't one at
19 that supervised the other.

20 Q. All right. So let's go to the bottom chart.

21 And there's an office staff or site staff. Let's
22 take office staff. What is that?

23 A. The office staff would be some part-time individuals
24 that we would come in and just help with filing and
25 scanning, things like that.

1 Q. And then site staffer?

2 A. Those were individuals that worked at physical sites.

3 Q. All right. I take it that your testimony is this
4 Exhibit A, one is outdated?

5 A. It is.

6 Q. Okay. So I want to talk to you about the top four.

7 Ms. Mallet, could you highlight the top four or
8 maybe five. Sorry. Is that four or five? Five, sorry.
9 I'm going to make it difficult for you today.

10 All right. So these are board members, right?

11 A. Correct.

12 Q. Now, I want you to tell me or at least so that the jury
13 understand the process that you used in getting board
14 members at Feeding Our Future.

15 A. So at this time it was very informal.

16 Q. What do you mean by that?

17 A. It was meeting with individuals independently. It
18 wasn't a formal function.

19 Q. All right. Tell me about Benjamin Stayberg. You heard
20 his testimony here, right?

21 A. I did.

22 Q. How did you come to meet Mr. Stayberg?

23 A. I had known him through some mutual friends. He also
24 worked for a neighbor of mine.

25 Q. All right. And did you request that he participate in

1 Feeding Our Future board?

2 A. I did.

3 Q. How far back did you ask him?

4 A. It would have been 2018.

5 Q. 2018. Is that around the time you started Feeding Our
6 Future?

7 A. That's around the time it became operational, yes.

8 Q. Okay. Now you just used the phrase "operational." You
9 started Feeding Our Future when?

10 A. I believe it was registered in 2016, 2017.

11 Q. And then you became operational in 2018?

12 A. Correct.

13 Q. So did you know Mr. Stayberg before 2018?

14 A. Yes.

15 Q. How much did you know him?

16 A. How much did I know him?

17 Q. Yes.

18 A. He was an acquaintance.

19 Q. All right. And what was the experience that
20 Mr. Stayberg had that drew you to wanting to join Feeding
21 Our Future?

22 A. At that time, he had been a manager at I think it was
23 Champps, and so he had a lot of experience with the
24 restaurant industry, preparing meals, serving, portion
25 sizes, how to order, deliver, receive food from various

1 companies.

2 Q. What about Mr. Senkler, John Senkler?

3 A. Yes.

4 Q. How did you come to know him?

5 A. Through mutual friends.

6 Q. All right. And how long did you know Mr. Senkler before
7 you asked him to join Feeding Our Future?

8 A. I believe I had known him for four or five years.

9 Q. All right. Describe for the jury the nature of your --
10 let me back up.

11 Did you have any official meeting with
12 Mr. Senkler?

13 A. An official formal meeting? No.

14 Q. So did you have any meeting with Mr. Senkler regarding
15 Feeding Our Future?

16 A. Yes.

17 Q. All right. If you can recall, could you describe the
18 setting of the meeting?

19 A. I talked to him more than once. I don't remember the
20 settings. A couple times were at restaurants. I believe
21 once or twice was at a coworker of mine's house.

22 Q. All right. What about Jamie Phelps or Phelps? Sorry.

23 What about Jamie Phelps?

24 A. So he was the neighbor of a coworker.

25 Q. All right. So you asked him to join the board too?

1 A. Correct.

2 Q. Now, did the membership of your board, did it remain the
3 same?

4 A. It did not.

5 Q. It changed?

6 A. It did.

7 Q. So let's talk about in more detail about Feeding Our
8 Future organization. All right?

9 A. Okay.

10 Q. There are a couple of exhibits that I want to talk to
11 you about that may help.

12 Now, you've given -- you have talked to the jury
13 about, you know, your organizational chart. Did Feeding Our
14 Future, did you have staff?

15 A. Yes.

16 Q. And how many, do you recall?

17 A. On average, about probably 60 to 70. I think our
18 highest was just over 100.

19 Q. You're looking at Exhibit D1-661. It's not in evidence.
20 What is this?

21 A. This is a staff roster that I had provided to the
22 Department of Education.

23 Q. Is this -- did you create this roster?

24 A. I did.

25 Q. And I see in the bottom is a grand jury submission. Do

1 you see that?

2 A. I do.

3 Q. And is this an accurate list of your staff?

4 A. From the time period that it was submitted to the
5 Department of Education, yes.

6 Q. What time period was that?

7 A. I believe it was around March of 2021.

8 MR. UDOIBOK: Your Honor, we offer Exhibit D1-661.

9 MR. THOMPSON: Can you scroll through it?

10 MR. UDOIBOK: Ms. Mallet, can you just scroll down
11 for the government?

12 MR. THOMPSON: No objection.

13 THE COURT: D1-661 is admitted.

14 BY MR. UDOIBOK:

15 Q. Let's go to the first page, please. Call out the first.

16 At the Feeding Our Future, you title it Management
17 Team. Do you see that?

18 A. I do.

19 Q. And I believe some of the personalities have been
20 described in the other exhibit you just testified to,
21 correct?

22 A. I'm sorry. What was that?

23 Q. Let me make it simpler. It's you as the executive
24 director, correct?

25 A. Yes.

1 Q. Followed by Mr. Hadith Ahmed?

2 A. Yes.

3 Q. And is the director of growth and development?

4 A. Correct.

5 Q. What does that, what does that mean, "growth and
6 development"?

7 A. So he was in charge of reviewing site application and
8 meeting with new locations that wanted to join the food
9 program and then sort of helping just develop them and make
10 sure that they're participating appropriately.

11 Q. All right. Let's stay on the first page and go to
12 claims staff. Call out the section claims staff on the
13 bottom. There you go.

14 So describe who, who -- the claims staff from this
15 document is supervised by another employee?

16 A. Correct.

17 Q. And that person will be the manager of operations?

18 A. Yes.

19 Q. All right. And based on exhibit, this Exhibit 661, you
20 had two claims staff?

21 A. At that time, yes.

22 Q. Did you, did you ever get more?

23 A. Yes, there were additional staff added.

24 Q. All right. Let's go to the second page. And just
25 scroll. And just stop. I'm not going to --

1 So this is list of all the employees?

2 A. Yes.

3 Q. I'm curious.

4 Ms. Mallet, could you go to the second page and
5 call out the first line, the site staff supervised by. Call
6 out that. No. No. The other one. The other line. Site
7 staff. There you go.

8 You say, "Site staff are supervised by Eidleh."
9 What do you mean by that?

10 A. So he would be in charge of hiring them and supervising
11 them.

12 Q. I'm curious about what your job description would have
13 been at this time. Did you have a job description?

14 A. I did.

15 Q. You are looking at what has been marked as Exhibit
16 D1-665. It's not in evidence.

17 Your Honor, I may have -- we offer D1-661.

18 THE COURT: D1-665?

19 MR. UDOIBOK: 661. I don't recall offering 661.
20 I may have.

21 THE COURT: You did, and it was admitted.

22 MR. UDOIBOK: Oh, thank you, Your Honor.

23 BY MR. UDOIBOK:

24 Q. Exhibit D1665, what is it?

25 It's not in evidence.

1 A. Oh, what is it? It's the job description for the
2 executive director, myself.

3 Q. And where did you get this from?

4 A. Feeding Our Future.

5 Q. Is this an accurate copy of the job description at
6 Feeding Our Future?

7 A. Yes, it is.

8 MR. UDOIBOK: Your Honor, we offer D1-665.

9 MR. THOMPSON: Objection. Hearsay.

10 THE COURT: Sustained.

11 BY MR. UDOIBOK:

12 Q. All right. So you testified it's a job description at
13 FOF, Feeding Our Future?

14 A. Yes.

15 Q. Okay. And is this Exhibit D1-665 part of Feeding Our
16 Future organizational record?

17 A. Yes, it is.

18 Q. And did you review this document as during the course of
19 your business at Feeding Our Future?

20 A. Yes.

21 Q. Is this an exact copy of Feeding Our Future position
22 details?

23 A. It is.

24 MR. UDOIBOK: Your Honor, we offer Exhibit D1-665.

25 MR. THOMPSON: Objection. Hearsay.

1 THE COURT: Sustained.

2 BY MR. UDOIBOK:

3 Q. Now, did you use Exhibit D1-665 during the course of
4 your employment at Feeding Our Future?

5 A. Yes.

6 Q. Did you review Exhibit 665 as part of the course of your
7 employment at Feeding Our Future?

8 A. Yes.

9 Q. Is this document Feeding Our Future business record?

10 A. Yes, it is.

11 THE COURT: Can I have a sidebar?

12 **(Sidebar discussion)**

13 THE COURT: Mr. Thompson could you explain your
14 objection, please?

15 MR. THOMPSON: Yes, Your Honor. Our objection is
16 to hearsay. This is a document that was created outside of
17 court, and it's offered presumably for the truth of the
18 matter asserted. It's not a business -- well, it's not a
19 legitimate business record.

20 None of the records kept at Feeding Our Future
21 were legitimate. In fact, this one on the screen now but
22 one of the first lines says that Aimee Bock reports to the
23 board of directors.

24 The court -- the court has already heard testimony
25 from each of the three purported board of directors of

1 Feeding Our Future, all three of which testified that they
2 were not actually a member of the board of directors and had
3 never gone to a board meeting and that Aimee Bock did not
4 report to them and they had no involvement with Feeding Our
5 Future.

6 The defense can't put in documents created in the
7 course of the fraud scheme under the business record
8 exception.

9 THE COURT: Mr. Udoibok, do you have a response?

10 MR. UDOIBOK: This is a record existed during her
11 employment at Feeding Our Future, is a position.
12 Description is a business record. If you look at it, Your
13 Honor, this is a record that was submitted to the grand jury
14 as GS -- it's the grand jury numbering.

15 THE COURT: I don't --

16 MR. UDOIBOK: This is a record that the government
17 obtained from Feeding Our Future, and it's a business --
18 there's no other exception that exists other than it's
19 business record.

20 This is the normal record that Feeding Our Future
21 relied on for the positions.

22 THE COURT: I am not convinced that this was kept
23 in the normal course of a regularly conducted business, and
24 therefore I'm going to sustain the objection.

25 MR. UDOIBOK: Okay.

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(In open court)

BY MR. UDOIBOK:

Q. And you were the executive director of Feeding Our Future, correct?

A. Yes, I was.

Q. Did you have a job description?

A. Yes, I did.

Q. Do you recall what your job description was?

A. I don't recall word for word, but generally, yeah.

Q. All right. Would it help you to refresh your recollection as to what your job description, if I showed you a document?

A. Yes.

MR. THOMPSON: Objection, Your Honor. She testified to what her job description was.

THE COURT: Sustained.

MR. UDOIBOK: All right.

BY MR. UDOIBOK:

Q. So if you can just slow down and think about what your job description was. What was your first one?

A. What's that?

Q. What was your first duty at Feeding Our Future?

A. The main role that I served was reviewing the USDA regulations, the USDA memos, handbooks, policies, as well as the MDE required documents, bulletins.

1 Q. So was your job description, did it involve visiting
2 sites?

3 A. No.

4 Q. But you did once in a while, did you?

5 A. I did from time to time.

6 Q. Did your job description involve fundraising?

7 A. It does. It did.

8 Q. All right. Did your job description --

9 Let me ask a question.

10 MR. THOMPSON: All right.

11 BY MR. UDOIBOK:

12 Q. So your job description involved fundraising. What
13 else?

14 A. Acting as the point of contact for the Department of
15 Education.

16 Q. All right. And what else?

17 A. Overseeing my management staff.

18 Q. What else?

19 A. Making sure that everyone understood the policies, the
20 procedures, how the program was supposed to operate so that
21 they would be able to -- I'd work with the management staff,
22 who would then pass it on to their team.

23 Q. All right. So I want to ask, ask you about at the peak
24 of Feeding Our Future how many staff did you have?

25 A. At the highest, it would have been around 100. I don't

1 recall the specific number.

2 Q. All right. So let's shift to how Feeding Our Future
3 managed its accounting.

4 Did you have an accountant?

5 A. Yes, we did, in January of 2020.

6 Q. And who was that?

7 A. It was Powered Books.

8 Q. And what is that?

9 A. It's a bookkeeping and accounting firm that operates.

10 Q. Did you have a contract with Power Book?

11 A. With who? I'm sorry.

12 Q. Did you have a contract?

13 A. Yes, we did.

14 Q. Now, I'm going to refer you to Exhibit D1-902. It's not
15 in evidence. What is it?

16 A. That is the agreement that Feeding Our Future, I signed
17 on behalf of the company, had with Powered Books Accounting
18 Services.

19 Q. Is Exhibit D1-902 a copy of the contract that you had
20 with Power Book?

21 A. Yes, it is.

22 Q. Is it an accurate copy?

23 A. Yes, it is.

24 MR. UDOIBOK: Your Honor, we offer D1-902.

25 THE COURT: Any objection?

1 MR. THOMPSON: Objection. Hearsay, Your Honor.

2 THE COURT: Can you scroll down, please?

3 Overruled.

4 BY MR. UDOIBOK:

5 Q. Let's go to the top, the first page. Call out the top
6 there.

7 What is that?

8 A. This is the fee that Powered Books --

9 Q. No. No. Go to the first page. First page. There you
10 go. Call that out.

11 What is that?

12 A. It is just the introduction to the letter that is going
13 to describe what services they're going to provide.

14 Q. Then go to the "What We'll Do." Take the first
15 paragraph. The first one.

16 Could you read that for the jury please?

17 A. Yes. "Here are the services that will be offered to you
18 by Powered Books. Number 1, we will review the data in your
19 current accounting/QuickBooks file and supporting documents
20 for Feeding Our Future.

21 "After our review, we will prepare a
22 recommendation for each issue you have listed. These
23 recommendations may include correcting journal entries,
24 suggested training, or changes in QuickBooks lists,
25 preferences, or other features.

1 "Upon your approval, we will then execute and
2 implement the above recommendations. All data and
3 supporting documents will be provided by you."

4 Q. Go to the next, or second service.

5 Could you read that?

6 A. "In case you do not have a QuickBooks online account, we
7 will create a QuickBooks online account for Feeding Our
8 Future with transactions that begin January 2020."

9 Q. Stop there. So that, was 2020 the time frame for this
10 agreement to begin?

11 A. Yes, it began I think like around the 20th of January,
12 2020.

13 Q. So go to the third category. Call that out. It froze?

14 MS. MALLET: Yeah.

15 MR. UDOIBOK: There you go.

16 BY MR. UDOIBOK:

17 Q. Could you read that?

18 A. "On a weekly basis, we will enter all accounting
19 transactions for Feeding Our Future into its QuickBooks
20 company file. This includes checks, deposits and other
21 transactions affecting the checking account.

22 "It also includes estimates, invoices, credit
23 memos, and all customer transactions. It includes vendor
24 transactions, bills, item receipts, checks, credit card
25 charges, and purchase orders.

1 "We will perform the bank reconciliation for the
2 checking account. We will also enter adjusting journal
3 entries as necessary, including depreciation."

4 Q. All right. Did you, did you continue to use the
5 Exhibit D1 as a service?

6 A. We eventually transferred to a different accounting
7 firm.

8 Q. What accounting firm was that?

9 A. Jitasa.

10 Q. What is Jitasa?

11 A. They are an accounting firm that specialized in
12 nonprofits.

13 Q. Why did you transition from Powered Books accounting to
14 Jitasa?

15 A. It seemed like it would be a better fit, since we were a
16 nonprofit organization to have an accounting firm that
17 that's what they do.

18 Q. All right. All right. You are looking at
19 Exhibit D1-904. It's not in evidence, but produced. What
20 is this?

21 A. This is the Jitasa service agreement.

22 Q. And is this document an accurate copy of your service
23 agreement with Jitasa?

24 A. Yes.

25 Q. And how did you get this document?

1 A. I believe it was by email.

2 Q. All right. And is it an accurate copy of the service
3 agreement?

4 A. Yes.

5 Q. And did you acquire this during your course of
6 employment with Feeding Our Future?

7 A. Yes, I did.

8 Q. And have you submitted this document to any, any forum
9 other than this?

10 A. Yes.

11 Q. Why do you say that?

12 A. Contracts and agreements get submitted to the Department
13 of Education.

14 Q. And this document has that EML number. What is that?

15 A. I believe that's the number that was assigned to it when
16 it was in discovery.

17 MR. UDOIBOK: Your Honor, we offer D1-904.

18 THE COURT: Scroll, please.

19 Mr. Thompson.

20 MR. THOMPSON: Your Honor, I'm going to object and
21 ask for a sidebar.

22 THE COURT: Yep.

23 **(Sidebar discussion)**

24 THE COURT: Mr. Thompson.

25 MR. THOMPSON: Your Honor, I would object on both

1 hearsay and authenticity grounds. This is not a business
2 record. It was actually not obtained from the company. It
3 was apparently an attachment to an email.

4 Similarly with the last, with the last exhibit, it
5 seems like Mr. Udoibok wants to put in records or
6 communications with an accounting firm or various firms and
7 then have Ms. Bock read from them and attempt to show the
8 nature of her relationship with the services that it may or
9 may not have provided to Feeding Our Future.

10 Those are classic hearsay. It's an out-of-court
11 statement offered for the truth of the matter asserted.
12 Here's there's no -- it's not kept in the normal course.
13 It's an email. There's no certificate of authenticity, so
14 we don't know whether this is a legitimate agreement or
15 frankly whether the firm actually continued with
16 representation, and so he's attempting to offer it as proof
17 of the nature of an accounting relationship between this
18 entity and --

19 But that's improper, hearsay, and it's not a
20 business record.

21 THE COURT: All right.

22 Mr. Udoibok, do you have anything?

23 MR. UDOIBOK: Your Honor, all the records I've
24 offered are acquired. They're business records. Those are
25 exceptions. I know the government believes my client is

1 engaged in fraud, but I have, I have to be able to put in
2 evidence acquired during the course of business.

3 And these are business records. These are
4 contracts that she had, that Feeding Our Future had, with an
5 accounting firm. I don't know what other way --

6 MR. THOMPSON: Your Honor, if I may. Ms. Bock is,
7 Ms. Bock is welcome to testify as to the relationship
8 between Feeding Our Future and this accounting firm. She
9 doesn't need to admit this hearsay exhibit in an attempt to
10 show it.

11 She can testify to it, and there's no 902(11)
12 certificate. It's not a record kept in the ordinary course
13 of any business as far as I can tell.

14 THE COURT: Again, in looking at the Rules of
15 Evidence, this one, it looks a little bit different to me
16 than the last one. This one is, it just looks odd,
17 different, and I wasn't sure the last one was being
18 submitted for the truth, which is why I let it in.

19 This one appears to be submitted for the truth.
20 And again looking at the rule, 902, records of a
21 regularly -- well records of a regularly connected activity,
22 it doesn't fit those. But I need to look at the hearsay.
23 So just a minute. Hang on.

24 No. It's the same.

25 I'm particularly concerned that this wasn't kept

1 in the regular course, that making the record wasn't a
2 regular practice of the activity, and there's also a
3 catchall under 6(e) that this sort of information indicates
4 a lack of trustworthiness.

5 Frankly here, there is a lack of trustworthiness.
6 I am not convinced that this record is a business record
7 under the business records exception to the hearsay rule.
8 And therefore I'm sustaining the objection.

9 **(In open court)**

10 BY MR. UDOIBOK:

11 Q. So, Ms. Bock, you had one accounting service called
12 Power Books Accounting, correct?

13 A. Correct.

14 Q. And then you had another one called -- what's that name?

15 A. Jitasa.

16 Q. And when did you have an agreement with Jitasa?

17 A. I don't recall the exact date. I believe it would have
18 been like August, September, 2021.

19 Q. All right. And what was Jitasa's function for Feeding
20 Our Future?

21 A. They maintained our books, so --

22 Q. Let's break it down a bit. When you say, "They
23 maintained your books," what do you mean by that?

24 A. I mean, they would match up payments that came in to
25 payments that went out. They would reconcile the account or

1 the QuickBooks account with the bank account, and then they
2 would categorize it into different classes so that we could
3 track where money was being spent.

4 Q. Was there any time that they issued a report to Feeding
5 Our Future?

6 A. A formal report?

7 Q. Yes.

8 A. I don't recall. I know we did a lot of emails and phone
9 calls.

10 Q. All right. I want to shift gears a little bit, just to
11 know how the workings of Feeding Our Future works. We've
12 talked about staff.

13 A. We have.

14 Q. So I want to shift gears to the nitty-gritty.

15 Did you prepare a chart?

16 A. Yes, I did.

17 Q. And, and that was the chart for?

18 A. It sort of walks through the life of a claim, if you
19 will, and the process and staff that reviewed it.

20 Q. What did you rely on in creating this chart?

21 A. I relied on the records of each role and department
22 within the organization, as well as just my own personal
23 experience.

24 Q. All right. You are looking at what has been marked as
25 Exhibit D1-1003. It's not in evidence. What is this?

1 A. That's a chart that I created that walks through the
2 process.

3 Q. The process where?

4 A. On the process of claims from the site, initially their
5 role and then the submission and processing at Feeding Our
6 Future.

7 Q. All right.

8 MR. UDOIBOK: I offer D1-1003.

9 THE COURT: As substantive evidence or a
10 demonstrative?

11 MR. UDOIBOK: Demonstrative and substantive.
12 Both.

13 THE COURT: Mr. Thompson.

14 MR. THOMPSON: Objection, Your Honor. I'm not
15 sure what it's demonstrating.

16 THE COURT: All right. It isn't admissible under
17 any Rule of Evidence, but it can be a demonstrative. It's
18 not a 1006 summary.

19 MR. UDOIBOK: So, Ms. Mallet, call out the --

20 THE COURT: Just a moment. What that means is you
21 will look at it now, but it doesn't go back to the jury with
22 you. You know that by now. All right.

23 Go ahead.

24 MR. UDOIBOK: Call out the first box there.

25

1 BY MR. UDOIBOK:

2 Q. What is it?

3 A. So this is the initial, the site purchases, the food,
4 creates their menu, and then they distribute the food to the
5 participants and complete the meal counts.

6 Q. All right. Now as an executive director at Feeding Our
7 Future, are you involved in the site purchases of food?

8 A. No.

9 Q. Are you involved in the creation of the menu?

10 MR. THOMPSON: Objection. Leading.

11 THE COURT: Sustained.

12 BY MR. UDOIBOK:

13 Q. All right. What is -- you testified about site
14 purchases of food, correct?

15 A. Correct.

16 Q. What's the next one?

17 A. They create the menu.

18 Q. What does that mean?

19 A. It means it's the menu showing that all of the required
20 foods are going to be served at the meal or snack.

21 Q. What's next?

22 A. They distribute the food to participants.

23 Q. All right. What does that mean?

24 A. It means that they feed them. So if it's a childcare
25 center, they will feed them at the table. They will eat it

1 there. If it was after-school during the waivers, they
2 would pass it out to the parents or whoever was picking up
3 the food.

4 Q. What about the next one?

5 A. They complete the meal counts.

6 Q. All right. What does that mean?

7 A. They keep track of the number of meals that are being
8 distributed and record it on the meal count form.

9 Q. Let's go to the next box. What is that?

10 A. So the food program support staff, like I said, are the
11 monitors, and they go to the sites periodically to check in.

12 Q. Now what happens next?

13 A. The claim is submitted to Feeding Our Future and the
14 documentation.

15 Q. When you say, "The claims are submitted to Feeding Our
16 Future," where in Feeding Our Future is the claim submitted?

17 A. The vast majority went to the claims at Feeding Our
18 Future email.

19 Q. The claims. Do you have access to claims at Feeding Our
20 Future email?

21 A. So I did not have the password for the daily function,
22 but as an administrator, I could go into that or any other
23 email and reset it if I needed to.

24 Q. So what device was claims submitted to at Feeding Our
25 Future?

1 A. They came in by email, and then they would go through
2 the next process.

3 Q. All right. Go to the next box. What is that?

4 A. So once it reached our claims department, the claims
5 staff would enter the meal counts into CenterPilot and then
6 they would log what had been received and entered on Monday.

7 Q. What is CenterPilot?

8 A. CenterPilot is a food program software that has edit
9 checks in it to make sure that claims are valid before we
10 submit them.

11 Q. Did you have access to CenterPilot?

12 A. I did.

13 Q. And how many staff had access to CenterPilot?

14 A. Our claims staff, as well as the coordinators, had
15 access.

16 Q. All right. What happened next?

17 MR. THOMPSON: Objection. I'm going to object,
18 Your Honor. He's leading this as a form of leading
19 questions. If I understand correctly, the defendant created
20 this herself. It's not some sort of independent piece of
21 evidence.

22 I think it's improper for her to just be reading
23 from it.

24 THE COURT: Sustained.

25

1 BY MR. UDOIBOK:

2 Q. All right. So you testified that a claim goes to
3 CenterPilot, right?

4 A. Yeah, the information gets entered into CenterPilot.

5 Q. Does it go to CenterPilot first?

6 A. Parts of it do. Other parts go to the coordinators for
7 review.

8 Q. All right. Where, where would claims go first?

9 A. They come into the claims department.

10 Q. And then where?

11 A. And then they keep the portion that is theirs to work
12 with, and they forward the rest on to the coordinator.

13 Q. All right. So did you have another platform that you
14 coordinated claims?

15 A. We used Monday.

16 Q. What is Monday?

17 A. It's a cloud-based software solution. It's used -- we
18 used it to track when various documents had been received,
19 and then staff would leave notes in there indicating the
20 status of --

21 Q. Would it help you to show the jury how claims flow, with
22 the chart?

23 A. Sure.

24 Q. Ms. Mallet, would you call D1 --

25 MR. THOMPSON: Your Honor, I'm going to object

1 again to this.

2 THE COURT: Is this D1?

3 MR. UDOIBOK: D1-1003.

4 THE COURT: All right. Before we get there, I
5 think what I'm going to do is break for today, and we will
6 come back Wednesday morning.

7 You all know you have Monday and Tuesday off, so
8 have a good weekend, everyone. We will see you Monday
9 morning -- Wednesday morning at 9:00. Thank you.

10 All rise for the jury.

11 4:45 p.m.

12 **IN OPEN COURT**

13 **(JURY NOT PRESENT)**

14 THE COURT: You may step down, Ms. Bock. Thank
15 you.

16 THE WITNESS: Thank you.

17 THE COURT: You may all be seated.

18 Just a couple of things before we break.

19 First, the contracts records that I excluded to,
20 allowed one. The one that I allowed I didn't believe was
21 being offered for the truth. It might have been.

22 Nonetheless, it is in. It wasn't a Feeding Our Future, it
23 didn't appear to be a Feeding Our Future document.

24 The other two tried to be qualified as business
25 records. They don't qualify as business records. Under the

1 business record exception to hearsay, there are, again, five
2 portions to that or five factors to consider. Not all of
3 them were met.

4 And in particular, I'll call out the problems of
5 untrustworthiness, which comes under 6(e), and that is why I
6 let them out or excluded them.

7 I'm going to continue to look at any records to
8 see whether they meet the business record exception to
9 determine whether they should be admitted.

10 So I wanted to explain my ruling there.

11 As to this demonstrative, the demonstrative is
12 appropriate if Ms. Bock testifies to it and it's a
13 demonstrative about her testimony after she testifies to it.
14 If you use it to lead her through her testimony, it's just
15 as though she brought notes up to the stand, which you would
16 object to, Mr. Udoibok, if any witness did.

17 And so that's why I'm not allowing it to be used
18 in that way.

19 If Ms. Bock testifies to something and that gets
20 created into a chart that could be a demonstrative, that's a
21 different story. That's why I sustained that objection. I
22 wanted to explain my rulings.

23 We'll start again with your direct on Wednesday.

24 Is there anything else to be raised before we
25 break?

1 Mr. Udoibok, do you have anything since you are on
2 the hot seat right now?

3 MR. UDOIBOK: Well, I've been in the hot seat,
4 but, yes, I understand the court's ruling. I'm not, I've
5 already been admonished enough from that so I'm got going to
6 broach that.

7 THE COURT: I don't mean to admonish you. I want
8 to explain my ruling.

9 MR. UDOIBOK: Yes, I understand. I understand the
10 court's ruling. The court is an umpire, you know. You call
11 the strikes.

12 My, you know, my job is to throw the fast balls
13 and curve balls, and I'll continue.

14 THE COURT: Okay. All right. Anything else from
15 the government before we break?

16 MR. THOMPSON: No, Your Honor. Thank you.

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

18 All right. All right. In that case, enjoy your
19 well-deserved break, and I will see you all Wednesday
20 morning.

21 If you have anything that you want to bring up
22 before the jury comes in, please let Ms. Wegner know that so
23 that we can could do that at 8:30. I want to maximize the
24 jury's time. They are understandably anxious.

25 All right.

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MR. UDOIBOK: Thanks for the break between.

(Court adjourned at 4:49 p.m., 03-07-2025.)

* * *

I, Renee A. Rogge, certify that the foregoing is a correct transcript from the record of proceedings in the above-entitled matter.

Certified by: /s/Renee A. Rogge
Renee A. Rogge, RMR-CRR