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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),)	Thursday, March 13, 2025
)	9:05 a.m.
Defendants.)	
)	

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

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

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Proceedings recorded by mechanical stenography;
Transcript produced by computer.

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* * *

1 9:05 a.m.

2 **IN OPEN COURT**

3 **(JURY PRESENT)**

4 THE COURT: Good morning, everyone. You may be
5 seated.

6 Ms. Bock, you remain under oath.

7 AIMEE BOCK,

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

10 THE COURT: Mr. Udoibok, you may continue your
11 examination.

12 MR. UDOIBOK: Thank you, Your Honor.

13 DIRECT EXAMINATION (Resumed)

14 BY MR. UDOIBOK:

15 Q. Good morning, Ms. Bock.

16 A. Good morning.

17 Q. I believe we left off yesterday, we were discussing
18 Exhibit D1-721, I believe.

19 Ms. Mallet, would you call up 721, just --

20 Do you recall that?

21 A. I do.

22 Q. What is it?

23 A. It is a before picture of one of the offices in the
24 Feeding Our Future larger office.

25 Q. Go to the next page. What is that?

1 A. Again, that's just a photo of one of the walls within
2 the office space. It was prior to the lease being signed,
3 and so we were documenting the condition of the space when
4 we moved in.

5 Q. Go to the next page. What is that?

6 A. This is another one of the smaller offices located
7 within the larger Feeding Our Future office.

8 Q. Next page. What is that?

9 A. Same thing. This is, again, just another one of the
10 smaller offices that existed.

11 Q. Go to the next page. What is that?

12 A. Again, it's the same -- just another interior picture of
13 one of the smaller offices.

14 Q. What level of the floor is that office?

15 A. These ones are all located on the third floor.

16 Q. How many floors did Feeding Our Future occupy?

17 A. So we leased the top half of the third floor and then a
18 large section of the second floor.

19 Q. Next page. What is that?

20 A. Another photo of one of the walls in the office.

21 Q. Next page. What is that?

22 A. This is the conference room. So this is an interior
23 picture of what became the conference room.

24 Q. Next page. What about that?

25 A. Same room, just from the -- showing the other half.

1 Q. Next page. Go ahead. What is that?

2 A. Yeah, this is the wall that was between -- the door on
3 the left here is the conference room, and then to the right
4 was the door to the break room/kitchenette area.

5 Q. Next page. What is that?

6 A. This is that break room/kitchen area.

7 Q. What about that?

8 A. Same room, just from -- showing the other side.

9 Q. We have the last page. What is that?

10 A. So this is kind of standing probably a third of the way
11 into the space. The -- to the right was the entry doors to
12 this portion. So you are looking at --

13 Q. Are you able to mark on that picture?

14 A. Yeah. So the door would be -- if you kind of follow
15 this wall, it would be probably about right here
16 (indicating), just further over to the right.

17 Q. And then you said a wall.

18 A. Yeah, the wall back here would have extended out and had
19 the glass doors that entered to the office.

20 Q. All right. These sets of pictures, were they taken
21 before renovation?

22 A. Yes. They were taken before Feeding Our Future moved
23 into any of the spaces.

24 Q. Who did the renovation for you?

25 A. Handy Helpers.

1 Q. And who owned Handy Helpers?

2 A. Empress Watson.

3 Q. That's the gentleman you had a relationship with,
4 correct?

5 A. Correct.

6 Q. Now, after the construction did you take pictures?

7 A. There were photos taken, yes.

8 Q. And about when did you take those photos?

9 A. They were taken at various times just kind of through
10 the course of the business. Some of them were taken after
11 the FBI had conducted their search. Others were from
12 before.

13 (Podium movement)

14 THE COURT: I don't know what -- sorry.

15 BY MR. UDOIBOK:

16 Q. All right. You were saying?

17 A. So some of the photos would have been from just during
18 the process or like right after it had been completed. Some
19 of them, I believe, were taken shortly after the search
20 warrants had been executed. And then --

21 Q. Who took the pictures?

22 A. Some of them I took. And I believe there's also some
23 that were taken by the FBI investigators.

24 Q. You're looking at what has been marked as
25 Exhibit D1-374. It's not in evidence. Sorry. 734. I'm

1 dyslexic.

2 Ms. Mallet: Okay.

3 BY MR. UDOIBOK:

4 Q. What are those? What is that?

5 A. That is the right half of the office space in -- showing
6 the hallway with the offices off to the side. This one down
7 at the end --

8 Q. Before you do that, I want to make sure we know who took
9 the pictures in 734.

10 A. These, I believe, were taken by the FBI.

11 Q. What does it depict?

12 A. It depicts the interior of the Feeding Our Future
13 office, or at least part of the hallway.

14 Q. Ms. Mallet, would you allow -- go through the pictures
15 for Ms. Bock to make sure the nine pictures are correct,
16 accurate pictures of the office space after the
17 construction.

18 (Pictures displayed to witness)

19 Q. Are you done?

20 A. I am, yeah.

21 Q. Are those an accurate photograph of pictures of Feeding
22 Our Future after the construction?

23 A. Yes, it is.

24 Q. At what time frame were these pictures taken?

25 A. These photos are from around the time that the FBI --

1 well, some of them were taken by the FBI during the search.
2 Others are -- the last couple are security camera photos
3 from that same day, January 20th.

4 MR. UDOIBOK: Your Honor, we offer 734.

5 MR. THOMPSON: No objection.

6 THE COURT: D1-734 is admitted.

7 MR. UDOIBOK: Thank you.

8 BY MR. UDOIBOK:

9 Q. So what is this, the first page of 734?

10 A. So this is -- I mentioned that there was glass doors
11 that entered. It would bring you into the lobby. And if
12 you kept going through, there would be another door that
13 would bring you to this hallway where, like I said, some of
14 the offices were housed. And then that's the conference
15 room straight ahead.

16 Q. Well, Ms. Mallet, are you able to call up 721? And I
17 want that side by side with page 12 of 721.

18 Okay. Now, you're looking at the first page of
19 734?

20 A. Yes.

21 Q. And this is the 12th page of 721. What is the
22 relationship between those two photographs? Any?

23 A. Yeah, so this is the conference room there (indicating),
24 which is also over there (indicating). And then it looks
25 like there's an office door that you can't see behind that

1 cabinet, and then it's this first one here (indicating).

2 Q. All right. What about the space to the right on 721?

3 A. On 721. This was the entry to that kitchenette/break
4 room area (indicating), but it's not depicted in the 734
5 photo.

6 Q. All right. Let's go forward to 734. Ms. Mallet,
7 release 721.

8 Ms. Mallet: You don't want that picture?

9 MR. UDOIBOK: No. I want to focus on 734 alone,
10 not side by side. Thank you.

11 BY MR. UDOIBOK:

12 Q. So let's go to the next page, page 2 of 734. Now, what
13 is this?

14 A. So this is the opposite end of the office. So my office
15 would have been kind of in the corner back here
16 (indicating). There's a couple offices here (indicating),
17 tool storage, and then this was a couple more offices.

18 Q. Where was the tool storage?

19 A. The tool storage was in there (indicating).

20 Q. Whose tool storage was that?

21 A. Handy Helpers.

22 Q. Next page. What is that?

23 A. This is -- again, if you walked through that lobby door
24 to enter the, like, office space, this would be looking to
25 the left. And so it is a series of offices along both sides

1 of the -- not the aisle -- the hallway, and then this was my
2 office straight ahead there.

3 Q. Were those offices -- by the way, how many offices could
4 you see on page 3 of this exhibit?

5 A. In this exhibit there is one, two, three, four, five,
6 six, seven offices.

7 Q. Were those seven offices in existence before the
8 construction?

9 A. Not all of them, no.

10 Q. How many were in existence before the construction?

11 A. So these ones along this wall here (indicating), those
12 were all in existence and remodeled.

13 My office, it existed, but this wall
14 (indicating) -- sorry, it's getting sloppy -- that wall was
15 extended out and then this whole -- oops -- this whole side
16 (indicating) is all new. That was part of that larger open
17 space.

18 Q. Next page. What is that?

19 A. So, again, this is in the -- we call it the big hallway,
20 looking towards the conference room. The offices along the
21 left were in existence. They were just remodeled, as was,
22 again, the conference room straight at the end.

23 This entire wall (indicating) was added. So the
24 corner here (indicating), when we had looked at the before
25 picture, this was the column that existed, and so a wall was

1 built between there.

2 Q. Next page. What is that?

3 A. This is the back hallway. The door -- the wood door on
4 the right is what led to one of the stairwells in the
5 building.

6 The white door straight ahead was -- I apologize,
7 I don't know what it was, but it was where all of the
8 electronic, internet, IT stuff was housed.

9 And then this (indicating) is a new addition.
10 Again, it had been part of that larger open space, but it
11 was an office. So this was an office that was created
12 within the space.

13 Q. Next page, please. What is that?

14 A. Oops.

15 So, again, this is the after-the-remodel photo.
16 This left wall here (indicating) with the file cabinets was
17 in existence. It's actually the picture that had the large
18 hole in it on the before.

19 The opening here (indicating) was to that
20 kitchenette area. And then, again, this is the column --
21 the further column that was in the before picture. And so
22 these walls -- oops -- these walls were added, as well as
23 that wall, to enclose that open space.

24 Q. Go to the next page, please. Now, what is that?

25 A. That is a still image from one of the security cameras

1 located within the office.

2 Q. And which -- was that space in existence when -- before
3 the construction started?

4 A. So, again, this is -- this security camera was located
5 right above that conference room. And so in the before when
6 we moved in, this whole middle section (indicating) that you
7 see did not exist. That was part of that open space with
8 just those square columns. And so this entire section
9 (indicating) all the way down was part of the construction.

10 Q. Go to the next page, please.

11 A. This is the security camera that was, again, next to
12 that IT/internet room facing into one of the offices. This
13 office here was (indicating) -- oh, sorry. The office
14 straight ahead was a multi-person office, so it housed three
15 or four employees. The tool storage is on the left. And
16 then, again, this whole wall (indicating), when we moved in,
17 it had just been a column in the corner. The rest of it was
18 all an expansion.

19 Q. Now, is that an exit door on the left?

20 A. Yeah, that's one of the exit doors, the emergency exit.
21 It's access to one of the two stairwells in the third floor.

22 Q. While you've shown pictures of offices, what you haven't
23 shown is the elevator. Was there an elevator when you,
24 what, signed a contract, signed a lease?

25 A. There are two elevators in the building. However, they

1 did not work. So when we moved in, neither of them were
2 functioning. At one point they got one that would run once
3 every couple weeks for a day and then it would break again.

4 So during the time we were there, there was no
5 working elevator. They finally replaced one of them, I
6 believe it was like fall of 2021.

7 Q. What was the significance of not having a working
8 elevator?

9 A. When it comes to this particular construction project,
10 it made everything much more difficult. It also made it
11 very hard to find any construction companies that would be
12 willing to take the job. All of that sheetrock, all of the
13 studs in between, these new doors all had to be carried up
14 three flights of stairs to the third floor of an office
15 building.

16 You can kind of see -- so the carpet was also
17 replaced. And then you can sort of see -- not right now
18 that I colored it. In the office, all of the carpet was
19 removed and laminate hardwood flooring was installed. And
20 so all of those boxes of flooring also had to be carried up
21 by people to the third floor.

22 Q. You are looking at what has been marked as
23 Exhibit D1-1010. It's not in evidence.

24 Just, Ms. Mallet, would you let her go through the
25 pictures first.

1 All right. What are those?

2 A. Those are images of a closet that was being used for
3 tool storage.

4 Q. Who kept the tools there?

5 A. Handy Helpers.

6 Q. Are those tools Handy Helpers' or Feeding Our Future's?

7 A. Handy Helpers'.

8 Q. All right. Who took these pictures?

9 A. I did.

10 Q. When did you take them?

11 A. Those were taken a couple days after the FBI had
12 executed its search warrant.

13 MR. UDOIBOK: Your Honor, we offer D1-1010.

14 THE COURT: Any objection?

15 MR. THOMPSON: No objection.

16 THE COURT: D1-1010 is admitted.

17 How many photos are there?

18 MR. UDOIBOK: Two.

19 THE COURT: Two. Thank you.

20 BY MR. UDOIBOK:

21 Q. Let's go to the first page. Are those always materials
22 Handy Helpers'?

23 A. Yes.

24 Q. What happened afterwards? Did he -- is it all still
25 there?

1 A. No. He was able to pick all of those items up.

2 Q. Now, I'm directing you to Government Exhibit AA1. It's
3 a set of pictures too. I believe it's in evidence.

4 So go to the second page. We're not going to go
5 through all of them. Go to the third page. Continue.

6 Now, I believe we had testimony already about --
7 what area is this?

8 A. This was the lobby area.

9 Q. Was this part of Handy Helpers' renovation?

10 A. Yes. So this corner here (indicating) was the closer
11 square pole in the before pictures. And so the wall was
12 added here (indicating) to divide the space and then again
13 there (indicating) to create a lobby.

14 Q. So, Ms. Mallet, I want you to go to page 12 of
15 Exhibit AA1.

16 All right. What is that?

17 A. That is a photo of the support staff room. There were,
18 I think, eight cubes in that room that the program support
19 staff officed in that space.

20 Q. Do you know when this picture -- these photos were
21 taken?

22 A. These, I believe, are FBI photos.

23 Q. Yes.

24 So why did you have -- why did Feeding Our Future
25 have those boxes sitting there?

1 A. Those were the boxes of all the information for the
2 sites. As part of the lawsuit, Feeding Our Future is
3 required to disclose documents. And so we had offered MDE
4 to come to our offices and review all the agreements, the
5 contracts, the internal and external communications, as well
6 as all of our claims information for the sites.

7 Q. So did you label the boxes for convenience?

8 A. Yeah, the staff labeled them. So once they would put it
9 in, they'd indicate which site that was for, make it easier
10 for MDE to review. Also because we have to retain records
11 for three years, should we need something in the future, it
12 would be easier to locate.

13 Q. Ms. Mallet, would you call out, if you can see, Gedi
14 Adult, please. What is that?

15 A. That is the box that appears to be holding all of the
16 documents for Gedi Adult Daycare.

17 Q. So you named each box based on -- is it a center or
18 vendor?

19 A. So the boxes --

20 Q. Release it, please. Sorry.

21 A. -- would have the name of the site on them.

22 Q. So let's go to page 15 of Government Exhibit AA1. What
23 is that?

24 A. Those are additional boxes. These are located in --
25 it's a double coat closet within that program support staff

1 room.

2 Q. Would you call out Excellent Childcare Center.

3 What is that?

4 A. That would be the box that contained the records for
5 Excellent Childcare Center.

6 Q. What populated the materials in those boxes?

7 A. So the materials inside of them would be the claims
8 information, so those meal counts, menus, invoices,
9 receipts. There's also forms that are required to be
10 completed once a year.

11 So those documents would be in there, completed by
12 the sites. And then, of course, if it's monitoring or a
13 form that required a Feeding Our Future signature or
14 completion, it would be those forms as well.

15 Q. So during the search warrant did the government take
16 into custody those boxes?

17 A. Yes.

18 Q. Let's go to 16. I'm just going to whip through.

19 Whose office is that?

20 A. So this is our conference room. And it is actually
21 showing down here (indicating) -- I had mentioned that when
22 we had investigations, we would put it into a red folder to
23 indicate to everyone that that claim was being investigated.
24 And so this is showing some of the claims that either were
25 being investigated or the investigative -- I'm sorry,

1 tongue-tied -- investigation had been concluded.

2 Q. So why did you choose red?

3 A. Because red seems -- it indicates stop. So it would be
4 a cue to everyone stop, don't process this information,
5 don't change Monday to reflect the claim is ready to be
6 submitted, there's something more going on.

7 Q. Go to the next page, please. Is that the same office or
8 another office?

9 A. Yeah, this is the same conference room. Again, it's
10 just looking at -- the far end had the two windows that you
11 can kind of see the parking lot out the back.

12 Q. Go to 21, please.

13 What is that?

14 A. This is the claims staff room. And so it had two desks
15 located in it, and then we had work stations elsewhere for
16 the part-time staff.

17 Q. Could you call out -- sorry -- call out the boxes on the
18 floor.

19 What is that?

20 A. Those would be claim folders for August, two for
21 September, October.

22 Q. Whose office was that?

23 A. This is the claims staff room. And so those would be
24 claims that either all the documents hadn't yet been put in
25 the folder or they were still in the process of being

1 reviewed and hadn't been submitted for reimbursement yet.

2 Q. Could you call out the boxes on top of the shelving
3 there.

4 What is that?

5 A. Those are -- so when the photo was taken, November and
6 December claims would have just been coming in still and so
7 that was, again, just the claims that had been received or
8 had been put together into a folder.

9 Q. Do you personally review those claims coming in about
10 that time?

11 A. No.

12 Q. Go to 27, please. "Do not knock, no?" What is that?

13 A. Do not knock, no questions.

14 The day before I left, I must have been either on
15 a conference call, in a meeting, or just really needed to
16 focus on getting something done. And so one of the staff
17 members put a sign on my door that basically said please
18 leave her alone, she needs to get what she's working on
19 done.

20 Q. Go to the next page. Whose office is that?

21 A. That's my office.

22 Q. Next page. What is that?

23 A. Again, this is my office. The two windows are looking
24 out onto the front of the building, the street that went by.
25 And then the TV. My desk is down here (indicating).

1 Q. Do you see the parking lot from there?

2 A. Not from there, no.

3 Q. All right. Okay. I want to shift focus a bit to --
4 we're still talking about Handy Helpers. Okay?

5 A. Okay.

6 Q. And what was the total renovation cost to Handy Helper?

7 A. I believe it was 900,000, maybe a million. It was
8 somewhere between 900,000 and a million.

9 Q. Over what period of time?

10 A. That would be over the start of the construction when we
11 signed the lease, which was two thousand -- I believe it was
12 2019, and then through 2022, January 20th.

13 Q. I just want to call your attention to something that I
14 need to get clear in my mind.

15 A. Okay.

16 Q. You testified that you caught sites that may have
17 committed fraud, correct?

18 A. Correct.

19 Q. And then you also testified that there was some that you
20 disallowed participation?

21 A. Correct.

22 Q. You testified that there were vendors that you outright
23 banned?

24 A. Yes.

25 Q. Well, were there some that you missed?

1 A. There were.

2 Q. Why? Did you -- you obviously caught some and then now
3 you are saying you missed some. Why?

4 A. So investigations were sometimes really difficult to --

5 Q. Why do you say that?

6 A. What would happen is we'd get an invoice in. We'd see
7 something on it, call the vendor. They would confirm that,
8 yes, they had provided that invoice. We would then request,
9 as I talked about yesterday, the backup documentation, the
10 support showing that they had purchased that food. That
11 would be provided.

12 And so we would have the meal counts. We would
13 have the invoice from who they bought the food. That
14 matched. And then we had invoices showing that that vendor
15 had purchased the food.

16 At all times everyone we contacted confirmed that
17 they had purchased the food, and so it checked out as far as
18 we could tell.

19 From the investigation and looking at their bank
20 records, it's clear now that they were all working together.

21 Q. Why do you say that? They are all working together in
22 what sense? Be specific.

23 A. Well, we've seen bank records indicating that there was
24 money moving that didn't match invoices from the supplier to
25 the vendor, ultimately to the site, which then made sense

1 why when we investigated every layer we asked is this real,
2 did this happen, they were all saying yes because, as the
3 government has been able to show, they were all in on it
4 together.

5 Q. All right. I'm going to move to another area that also
6 concern me, and this is Government Exhibit BB40a, BB40a.

7 I want to direct -- by the way, what is this?

8 A. This is a message -- text messages between myself and
9 Hadith Ahmed.

10 Q. And who is Hadith Ahmed?

11 A. He is the consultant that was terminated as a result of
12 the Action For East African People investigation.

13 Q. And who terminated him?

14 A. I did.

15 Q. All right. Excuse me. I'm going to direct you to this
16 exhibit, a government exhibit, page 8.

17 Ms. Mallet, could you go to page 8. Excuse me. I
18 want you to call out the last column there.

19 Would you read that?

20 A. "We may have become the mob."

21 Q. What did you mean by that?

22 A. So earlier, I think it's on the page before that -- this
23 was a conversation regarding Anab Awad, and what was
24 happening at that time is information was being spread about
25 Feeding Our Future submitting claims and refusing to

1 reimburse them.

2 I had also learned during that investigation that
3 Anab Awad was being investigated for Medicaid fraud and she
4 ended up actually being indicted maybe a month after this
5 conversation.

6 And so it was a sarcastic joke in I wanted to do
7 the subpoena because I wanted MDE to know. And when I had
8 expressed concerns before, they were not always taken
9 serious. So I'm saying if it doesn't go well, we'll
10 subpoena, we'll get the information and MDE, because of the
11 lawsuit, will for sure see it.

12 The mob part was a sarcastic joke because we
13 addressed problems aggressively. So like the mob, If they
14 have problems, they are known to attack and eliminate that
15 problem. When we had problems, we would aggressively attack
16 and eliminate.

17 Q. All right. Fair enough.

18 Now, I'm going to change direction now to
19 Government Exhibit X39.

20 You recall testimony about this exhibit? It's in
21 evidence.

22 A. Correct.

23 Q. So did you -- was there any time during your employment
24 with Feeding Our Future that you engaged in any conspiracy
25 to extort money from the food program?

1 A. No. Oh, sorry. No, never.

2 Q. So during your employment at Feeding Our Future, did you
3 devise any scheme to mislead the public to your benefit?

4 A. No. It was just the opposite. We were -- I was trying
5 to expose what we were seeing. I was trying to get people
6 to take it seriously.

7 Q. Let's, Ms. Mallet, go to the second page of this
8 document. Start first with -- call out Feeding Our Future
9 Donations, that column, Feeding Our Future Donations, the
10 one in the middle. There you go.

11 Do you know what that is?

12 A. I do. Those were donations that were made to Feeding
13 Our Future.

14 Q. All right. Were they made to you personally?

15 A. No.

16 Q. Do you know who made them?

17 A. I couldn't tell you the specifics. I know we've seen
18 checks. It was a number of different organizations and
19 individuals, some of who were part of the food program.

20 Q. All right. Release. Call out the next column.

21 Do you know what that is?

22 A. I do. That is a GoFundMe, that campaign, that Feeding
23 Our Future had.

24 Q. Why?

25 A. That was established -- Feeding Our Future worked with

1 Governor Walz's office as well as the City of Minneapolis on
2 the Afghan Refugee Resettlement Project. When the afghan
3 refugees were being brought in and housed in emergency
4 shelters, Feeding Our Future was the organization that
5 ensured that they had food for all of their meals.

6 We also -- Feeding Our Future agreed to help
7 provide new clothing, home furnishings. They arrived with
8 basically what they had. And so we were doing a fundraiser
9 to help gather funds to support that effort.

10 And then secondarily, it's to support the
11 after-school program. Should there be excess funds, those
12 funds would be used to help after-school programs.

13 Q. Did the Feeding Our Future GoFundMe funds, any of them
14 go to you personally?

15 A. No.

16 Q. Did -- were the moneys sent to you personally?

17 A. No.

18 Q. All right. Let's go to the next page. I want to start
19 with the bottom one. Call out that.

20 Who is C. Bock?

21 A. My son.

22 Q. Did he do any work for Feeding Our Future?

23 A. He did. He was 15, 16 at the time, and so he would come
24 in on his days that there weren't school from time to time
25 and help with office tasks, filing, copying, scanning, those

1 kinds of things.

2 He would also -- from time to time when I would
3 bring documents home or Monday -- when a new month would
4 come, we would have to create a new board and reset it all,
5 and so he'd do that. It's a lot of busy work of just
6 clicking boxes and turning them gray.

7 So, yeah, he did from time to time simple, basic
8 office tasks.

9 Q. How do you feel seeing your son listed as part of moneys
10 allegedly a wrongdoing?

11 MR. THOMPSON: Your Honor, that misstates the
12 charge. It lists money going to Ms. Bock.

13 THE COURT: Overruled. You may answer.

14 THE WITNESS: I guess I'm confused. He did not
15 have a bank account at that time. He had what's called a
16 Greenlight card, which is one of the parent protected debit
17 cards. So there's no bank to deposit the funds to. So it
18 would go into my account and then there would be a matching
19 transfer to put it onto his card until he got kind of a
20 grownup bank account, if you will.

21 So, yes, it went through my account, but it was
22 for work that was completed by my child that he earned and
23 he received his earned income from.

24 So I guess I am -- it bothers me to see my son on
25 here as part of this at all, but it also confuses me why a

1 16-year-old's \$2,800 wage would be part of this.

2 BY MR. UDOIBOK:

3 Q. Okay. Let's release that, please. Call out School Age
4 Consultant.

5 There was testimony about School Age Consultant,
6 correct?

7 A. There has been.

8 Q. Did you suggest to anyone to give you money for School
9 Age Consultant?

10 A. No. In fact, I advised that if they're able to, they
11 should write their own or to contact a public health nurse
12 and that this would be available should they choose.

13 Q. And at that meeting -- was this at a public meeting that
14 you made that suggestion?

15 A. Yeah. So that was the December 2021 meeting that we've
16 heard about kind of throughout. It was focused on
17 compliance with all of the rules. So we did talk about, as
18 I mentioned, the Department of Human Services who oversees
19 the care of children. We also talked about the sites
20 meeting required building inspections, fire marshal
21 inspections.

22 Some of the sites, during investigations I had
23 learned, had not been coordinating with their local health
24 department. They needed a different sort of license to pass
25 out the grocery sort of food, and some of them hadn't done

1 that. And so we were giving them the instructions on how to
2 do that and then, again, as well as the requirements of
3 caring for children after school.

4 Q. Call out the next section, Feeding Our -- go ahead.

5 I believe you discussed this 180,000 sum?

6 A. Some of it, yeah. The only thing that's -- well, I
7 guess the main thing that's weird about this is when there's
8 a nonprofit bank account, yes, I was the signer on it.
9 However, the money does not belong to me.

10 And so should I have left, the money would stay in
11 the account with a new signer. Should Feeding Our Future
12 have decided to close any money that had been in the account
13 from the government, from the food programs would be
14 returned to the government.

15 And then by law these donations need to be
16 re-donated to another nonprofit that does work in the same
17 area. That's the same with all of, like, the office
18 equipment, furniture and all of that. Once it's in a
19 nonprofit, it needs to stay in a nonprofit.

20 Q. Did any of the \$180,000 go to you?

21 A. No.

22 Q. All right. Let's go to the next column.

23 What is that?

24 A. That is the payroll that I received between 2020 and
25 2022. The 310 is the sale of a child care center that I

1 owned. And then the rent payments for The Learning Journey
2 Southcross is odd, as we have seen. And I talked about
3 Southcross was a site that was operated, and so Feeding Our
4 Future was essentially subleasing the place. It was food
5 being distributed from there, and so the rent was being paid
6 by Feeding Our Future.

7 Q. All right. The last one is Empress Watson. What is
8 that?

9 A. That is the income that he received for the cost of the
10 construction, the \$871,500. He was also on the Feeding Our
11 Future payroll during that time.

12 Q. During that time?

13 A. Mm-hmm.

14 Q. Why did you pay him -- why was he collecting payroll as
15 well as construction?

16 A. The construction was a large project. He was on the
17 payroll. That was part of the agreement. When I could not
18 find anyone else to come in with the third floor, he was put
19 on to help, one, subsidize some of the costs of it, but also
20 for workers' comp purposes should there be an injury or
21 something carrying all that heavy stuff up to the third
22 floor.

23 Q. Okay. Release that.

24 I want to change focus again. I'm always changing
25 focus. I want to go to your sale of the center.

1 A. Okay.

2 Q. I want to start first with Government Exhibit HH26.

3 So what is that?

4 A. That is the purchase agreement from the sale of the
5 center.

6 Q. Ms. Mallet, could you call out that -- the top third.

7 The purchase agreement was signed on August 13,
8 2021?

9 A. Correct.

10 Q. All right. Go to the signatory, the last page.

11 What is that?

12 A. That is the payment stub or the check stub for the
13 cashier's check from the sale of the center.

14 Q. All right. Go to the next page backwards. Call it out.

15 Is that your signature?

16 A. Yes, it is.

17 Q. Whose signature is on the bottom there?

18 A. I know that it's Abdulkadir Nur Salah.

19 Q. All right. Excuse me. What was the purpose of the
20 sale?

21 A. I was selling it was called The Learning Journey, the
22 child care center, to him.

23 Q. Just give me a second.

24 (Counsel confer)

25 MR. UDOIBOK: Your Honor, may I have a moment with

1 my paralegal?

2 THE COURT: Yes.

3 (Mr. Udoibok confers with Ms. Mallet)

4 BY MR. UDOIBOK:

5 Q. This exhibit is already in evidence, but I can't put it
6 up right now.

7 A. Okay.

8 Q. But when did you incorporate this learning center?

9 A. Yeah. The Learning Journey was incorporated in 2019. I
10 believe it was September.

11 Q. September 2019. When did Feeding Our Future start
12 operation?

13 A. We had started operations in 2018 through 2022.

14 Q. All right. So in 2019 you incorporated The Learning
15 Journey, correct?

16 A. Yes.

17 Q. And did you get a tax ID number?

18 A. I did.

19 Q. With the IRS?

20 A. Yes, both with the State of Minnesota and the IRS.

21 Q. When did you do that?

22 A. I believe also September of 2019.

23 Q. Prior to registering the child center -- The Learning
24 Journey LLC, is that it?

25 A. That's it.

1 Q. -- did you have any experience in child care?

2 A. Yes. I was -- I went to college for elementary
3 education, kindergarten through eighth. However, most of my
4 career was spent in child care centers. So I had experience
5 as a teacher for the various age groups, as an assistant
6 director, as a director.

7 I had also worked on an accreditation project from
8 the Greater Twin Cities United Way, which focused on
9 improving the quality of child care centers in the metro
10 area, particularly those that were serving low income or
11 at-risk youth.

12 I additionally was an approved trainer for the
13 State of Minnesota, and so I was able to provide the
14 majority of the required annual trainings to child care
15 providers.

16 Q. So why in 2019 did you register this -- is it a
17 corporation?

18 A. Yes, I believe it was registered. It's an LLC --

19 Q. Okay.

20 A. -- corporation.

21 Q. Why did you register it?

22 A. It had always been a goal of mine to have a child care
23 center. I had spent many, many years collecting inventory
24 and was finally at a place that I could make that happen.

25 Q. So in 2019 you registered the organization. Why didn't

1 you start work?

2 A. Well, shortly into 2020 the pandemic hit. Many child
3 cares were closed. Parents weren't working, so they weren't
4 going to pay the tuition to put their children there. It
5 was just not a good time to attempt to open a daycare
6 center.

7 Q. Before August 2021, when you signed this agreement, did
8 you -- what did you do about getting the child care center
9 operational?

10 A. Yeah. So, again, back to early 2021 -- or 2020, we were
11 all hopeful that the pandemic would be two weeks at home and
12 then we'll be back to normal, a month at home and we'll be
13 back to normal.

14 And so in those early months I continued to get it
15 ready, submitted an application to the Department of Human
16 Services for a license, got all the classrooms set up with
17 the required furniture, equipment so that it was ready for
18 an inspection.

19 Q. Now, did you have any equipment?

20 A. Yes. You are required to have equipment because any
21 time during the application process, Department of Human
22 Services can come out and conduct an inspection and they
23 will not license you if you don't have all of the required
24 at least bare minimal materials. However, there was more
25 than that there.

1 Q. What did you have in there, for the benefit of the jury?

2 A. There was a lot of equipment. So the infant room would
3 have been licensed for eight. So there was eight cribs
4 required, two changing tables, a teacher's storage cabinet,
5 a rocking chair, a cart with bottle warmers, high chairs.

6 And then, of course, like the carpet, you are
7 required to have a piece of carpet in there. We had some of
8 those foam mat material climbers, a variety of toys,
9 rattles, baby stuff.

10 In the toddler room, that room was intended to be
11 licensed for 28 and so we had to have appropriate tables and
12 28 chairs at a minimum. There also needed to be, and this
13 is for all -- I guess all of the remaining age groups.
14 There needs to be math materials, science materials, arts,
15 as well as dramatic play, a creative area.

16 And so in the toddler preschool and school age
17 classrooms there was the wood little stoves, refrigerators,
18 dishwashers, again, tables, chairs. There were books, a
19 library area, a couple of carpets, and then lots and lots of
20 toys and manipulatives and --

21 Q. Now, where was this child care center located?

22 A. It was located at 1506 Southcross Drive West in
23 Burnsville.

24 Q. Did you have a lease?

25 A. I did.

1 Q. When did you sign this lease?

2 A. I believe that was signed at the end of 2019. It may
3 have been beginning of 2020. I don't recall exactly.

4 Q. All right. Who did you sign a lease with?

5 A. A landlord. I don't -- it was a professional management
6 company. I don't remember their name.

7 Q. All right. Now, you testified it was your intention to
8 start the child care center?

9 A. Correct.

10 Q. Did -- what did you do to let people know that a child
11 care center would have been located there?

12 A. Mm-hmm. So there was signs out in front that said "The
13 Learning Journey," had the logo for all of the parking
14 spots.

15 Had communicated with -- there was another center
16 next door that served a different group of children, and so
17 we informed them of the intention to open.

18 And then it was a food site and so there was a lot
19 of traffic coming to pick up site -- or, I'm sorry, pick up
20 the meals and snacks, so they would see the signage.

21 And then as part of the food distribution, there
22 had been -- while it didn't say "The Learning Journey,"
23 there were Facebook ads that were purchased to indicate that
24 food was available at that location. And so, again, the
25 name wasn't there because it was a Feeding Our Future -- it

1 was a food distribution site, but I think at the peak the
2 ads were reaching a hundred thousand individuals on Facebook
3 and so the address became known.

4 Q. So at some point you decided you were not going to
5 continue with the child -- with child care, correct?

6 A. Yeah. As the pandemic continued and as Feeding Our
7 Future grew, my time was limited. So in December of 2020 I
8 had reached out to the Department of Human Services and
9 inquired about what would happen to the application if I
10 sold a portion of it. At that time I had still hoped to
11 retain some ownership.

12 As time went on, I was not going to be able to
13 open it. I didn't have the time, the energy. The pandemic
14 was still going. There wasn't the need for child care. So
15 I eventually decided to just sell the whole thing.

16 Q. All right. Well, when you sold the whole thing, what
17 happened to the lease?

18 A. It was supposed to be transferred.

19 Q. All right. And at some point, I believe you testified,
20 the site also became a food distribution center?

21 A. Yeah. So it had distributed food from October of 2020.
22 Like I mentioned, it was a training site. And then
23 eventually it was turned over and Empire operated it until
24 they were terminated. Then there was a couple months that
25 no food was distributed.

1 Once the center was sold, the new owners were free
2 to do what they wanted with it. And so I believe it was Bet
3 on Better Future. It might have been Stigma-Free. One of
4 them took over.

5 Q. All right. Now, did you do -- how did you come about
6 the \$310,000 sale?

7 A. Yeah, a couple ways. I had reviewed purchase agreements
8 for similar centers and gotten a feel. I had reviewed other
9 centers that were for sale that would be similarly situated,
10 because the range was wide.

11 So there was one center for sale that included the
12 real estate and everything and it was close to \$3 million.
13 There's smaller ones in smaller locations that would be
14 closer to maybe 1 or 2.

15 Given the condition, the equipment, the supplies,
16 and the state -- or one of the child care organizations
17 tracks child care need, and this was located in an area that
18 there was a need.

19 Additionally, around the time of the sale is when
20 the cities were passing ordinances regarding the sale of
21 cigarettes and -- I don't know the details of that, I don't
22 smoke, but the gas station owner next door had approached me
23 and offered me a hundred thousand dollars to -- it was a
24 two-unit space. He wanted to give me a hundred thousand
25 dollars to be able to take over the right portion so that he

1 could open a tobacco store in there and still be able to
2 sell those products.

3 THE COURT: All right. I'm going to stop and just
4 ask for you to ask another question. Okay?

5 MR. UDOIBOK: Sure.

6 THE COURT: All right. Thank you.

7 BY MR. UDOIBOK:

8 Q. Ms. Mallet, would you go to the second page of
9 Government Exhibit HH26. Call out the box.

10 Now, what is that?

11 A. That is indicating that the sale price -- 75,000 of it
12 was for the equipment, the furniture, the toys; and then
13 235,000 was for the goodwill.

14 Q. What is goodwill?

15 A. My understanding and the intention of the goodwill was
16 that I would stay on. When a child care center opens, even
17 if it had been licensed, it's not transferrable, so that
18 means even a new owner has to go through the entire process.

19 I was going to stay on and help with that. I was going to
20 train and help hire any new staff or director/manager to
21 help make sure that the center was able to get operational.

22 Q. All right. Let's go to Government Exhibit S19. That's
23 the exhibit I was trying to -- go to page 54. Would you
24 call out the date of issue, please.

25 Is that the date you registered Learning Journey

1 with the Secretary of State?

2 A. Yes.

3 Q. All right.

4 A. September 30th, 2019.

5 Q. Now go to page 2. Could you call out the top third.

6 Is that the date that you received the employer
7 identification number from the IRS?

8 A. Yeah, that's the date that I received it.

9 Q. Okay. You've heard -- release it, please.

10 Ms. Bock, you've heard testimony that the \$310,000
11 was somehow either a bribe or kickback. You've heard that,
12 right?

13 A. I've heard that.

14 Q. Was it a bribe?

15 A. No. I sold my center. If it was a bribe, I would still
16 have my daycare center.

17 Q. Was it a kickback?

18 A. No, never.

19 Q. Why do you say that?

20 A. I would never accept a kickback. I would never ask for
21 one. I was very passionate about the program and making
22 sure that the children that needed the food were able to get
23 it. And so I worked hard to try to protect it, but I would
24 never, never participate --

25 Q. Was it a bribe for someone to participate in the Feeding

1 Our Future program?

2 A. To participate?

3 Q. Yes.

4 A. No. Anyone can participate that meets the requirements.

5 Q. Okay. I want to just sum up with asking you a few
6 questions.

7 A. Okay.

8 Q. On Count 1, all right, of the indictment you're charged
9 with conspiring with Mr. Said, the wire fraud conspiracy. I
10 want you to think hard.

11 A. Okay.

12 Q. Throughout your employment with Feeding Our Future, did
13 you intentionally, unintentionally, even with a wink, agree
14 to violate any of the food program laws?

15 A. No. I actually implemented processes that far exceeded
16 some of the state and federal regulations.

17 Q. Okay. So we go to Count 2 --

18 A. Okay.

19 Q. -- which is wire fraud.

20 A. Yes.

21 Q. Did you send any communication to MDE or anyone, any
22 governmental authority, MDE, intending to mislead or cause
23 fraud?

24 MR. THOMPSON: Objection, Your Honor. That
25 mischaracterizes the wire fraud count.

1 THE COURT: Sustained.

2 MR. UDOIBOK: All right.

3 BY MR. UDOIBOK:

4 Q. Just wire fraud --

5 A. Okay.

6 Q. -- did you commit wire fraud?

7 A. No, no. I -- all the emails I sent were based on the
8 information and knowledge that I had. I never, never would
9 submit anything. I answered and provided as much
10 information as I could. I supplemented stuff to try to make
11 it clear to MDE what was going on with each of the sites.

12 Q. So regarding conspiracy to commit federal programs --
13 bribery, did you accept bribes from anyone?

14 A. No, never. It was a joke at the office. There was a
15 perfume bottle. I had commented someone smelled good, and
16 they happened to have a trial size bottle in their purse and
17 they said, Here you can have this. And I refused to take it
18 home. It floated around the office. It may still even be
19 there. Because I wouldn't take it home. I -- the
20 regulations, the rules are clear. I would not. It --
21 nothing is worse or worth -- nothing would be worse or worth
22 ever being separated from my children.

23 Q. Did you suggest to anyone to give you a bribe?

24 A. No. And when I learned that Hadith had taken a bribe, I
25 immediately terminated him and attempted to report.

1 Q. Did you ask anyone to give you \$1.5 million in cash?

2 A. No. No.

3 Q. Why do you say that?

4 A. Why? I never asked anyone for anything. And
5 \$1.5 million is -- it's absurd. Like, it doesn't even make
6 sense, especially in that situation. Those claims could not
7 have even been submitted.

8 The maximum amount -- like, let's say, for Brava
9 Cafe, her claims were valid and could have been submitted.
10 Her reimbursement amount would have been probably around
11 700,000.

12 And so the idea that I would agree to submit
13 claims for more than double the amount that they would
14 receive, it doesn't make sense. It's not possible.

15 MR. UDOIBOK: No further questions.

16 THE COURT: Mr. Thompson, cross-examination.

17 MR. THOMPSON: Thank you, Your Honor.

18 CROSS-EXAMINATION

19 BY MR. THOMPSON:

20 Q. Good morning, Ms. Bock.

21 A. Good morning.

22 Q. I have a lot of questions for you, but I want to start
23 off by, I think, framing the issues that are before the
24 jury. Okay?

25 A. Okay.

1 Q. First off, if I understand your testimony correctly, you
2 agree that there was a fraud committed here; is that right?

3 A. There was fraud in the food program --

4 Q. Yes.

5 A. -- yes.

6 Q. And that was a fraud -- it was a fraud scheme that was
7 carried out to fraudulently obtain Federal Child Nutrition
8 Program funds; is that right?

9 A. That -- yes, that appears to have been the goal of the
10 individuals.

11 Q. In fact, millions of dollars' worth, correct?

12 A. It appears that way, yes.

13 Q. And this was a fraud scheme that sought to take
14 advantage of a time of crisis, you would agree, correct?

15 A. I don't know that that was their intent, the intention,
16 I don't know why they did what they did, but, yes, it
17 happened during a time that regulations were loosened.

18 Q. So certainly tried to take advantage of that pandemic,
19 correct?

20 A. It would appear that way, yes.

21 Q. I mean, it did, correct?

22 A. Certain individuals, yes, they did commit fraud during
23 at that time.

24 Q. Like Mr. Said?

25 A. I wouldn't say that.

1 Q. Okay. This was a program designed to feed kids,
2 correct?

3 A. Correct.

4 Q. Healthy meals?

5 A. Correct.

6 Q. Nutritious meals?

7 A. The requirements are debatable on the nutrition level,
8 but yes.

9 Q. To kids that otherwise couldn't afford them, correct?

10 A. To participants that qualify.

11 Q. Kids that otherwise can't afford them, that are
12 disadvantaged in some way, correct, that's the intent of the
13 program?

14 A. Are you speaking of the after-school program
15 specifically or --

16 Q. Ms. Bock, I'm speaking of the money that was stolen from
17 the Federal Child Nutrition Program. You are familiar with
18 that program, correct?

19 A. The after-school program?

20 Q. Yes.

21 A. Yes, the goal is to provide meals to participants that
22 qualify for them or attend a program that's in an area
23 that's qualified.

24 Q. And generally you would agree that the intent of that
25 program is to feed kids that otherwise can't afford meals on

1 their own, correct?

2 A. The intent is to feed participants, yes.

3 Q. Okay. And the participants in this fraud scheme, you
4 would agree, stole that money, obtained it fraudulently,
5 correct?

6 A. Those that stole, yes.

7 Q. And they used it to enrich themselves?

8 A. It appears that way.

9 Q. Used it to purchase cars?

10 A. Appears that way for some of them, yes.

11 Q. Luxury cars?

12 A. I guess -- I don't know cars, but, yeah, I've -- they're
13 fancy cars, I know that.

14 Q. Ms. Bock, you know cars. You've driven in a Lamborghini
15 correct?

16 A. I have been an unwilling passenger in a Lamborghini.

17 Q. Okay. It was used -- the money was used to purchase
18 real estate, correct?

19 A. Appears so, yes.

20 Q. Houses?

21 A. Appears so, yes.

22 Q. Outright without a mortgage, correct?

23 A. That's what I've learned. I would have not had a way of
24 knowing that.

25 Q. Commercial buildings?

1 A. It appears that way, yes.

2 Q. Again, for millions of dollars, correct?

3 A. That's what we've seen and I've heard, yes.

4 Q. And purchased outright without any financing or
5 mortgages, correct?

6 A. That appears to be what happened.

7 Q. Federal Child Nutrition Program funds used to do so,
8 correct?

9 A. Depending on the type of organization, yes. Some of the
10 funds received by vendors are for the sale of food.

11 Q. But Federal Child Nutrition Program funds ultimately,
12 correct?

13 A. You could say that, although that's not generally how
14 it's classified as a business expense.

15 Q. So I just want to make sure I'm hearing you correctly.
16 You are saying this was okay using Federal Child Nutrition
17 Program funds to purchase millions of dollars' worth of real
18 estate. Is that what your testimony is here?

19 A. No. My testimony is that restaurants, stores, Sysco,
20 all of those organizations received money that originated in
21 the nutrition program and they are allowed to use their
22 profits as they please.

23 Q. Okay. All right. You will agree that this scheme was
24 characterized by fraudulent documents, correct?

25 A. Characterized by? There were fraudulent documents.

1 Q. Fraudulent meal counts?

2 A. It -- yes.

3 Q. Okay. And these are meal counts that claimed that they
4 were serving meals to thousands of kids a day, correct?

5 A. Some of them, yes.

6 Q. Day after day?

7 A. Correct.

8 Q. Seven days a week?

9 A. Depending on their type of operation.

10 Q. Week after week?

11 A. Yes.

12 Q. Month after month?

13 A. Yes, for some of them.

14 Q. Often essentially the same number of children every
15 single day, week, month, correct?

16 A. Yes.

17 Q. And I think you pointed out before that in your
18 investigations, you saw documents that you found suspicious,
19 correct?

20 A. Absolutely.

21 Q. And one of the hallmarks or indicia of suspiciousness
22 was the document saying the same thing day after day, week
23 after week, correct, invoices that looked the same, for
24 example?

25 A. That was not what I testified. My testimony was that

1 the concern was that it was two separate vendors with the
2 exact same food, the exact same description in the same
3 order.

4 Q. You would agree with me that meal counts that said the
5 same number day after day, week after week, month after
6 month would be suspicious, correct?

7 A. Not necessarily.

8 Q. Okay. You saw this scheme use fake attendance rosters,
9 correct?

10 A. There were rosters. I don't know whether they were fake
11 or not because they were not reviewed, nor were they
12 required.

13 Q. Well, you saw the testimony. We'll go back to the
14 requirement. They were certainly provided to Feeding Our
15 Future, correct?

16 A. Feeding Our Future collected them.

17 Q. And you've seen the testimony they were fake, correct?

18 A. Yes.

19 Q. The names weren't real?

20 A. Yes.

21 Q. Not real kids?

22 A. No, there was not a requirement to collect that
23 information.

24 Q. The rosters that were submitted to Feeding Our Future in
25 support of the claims, many of them had not a single name

1 that attended school in the -- that was listed on the public
2 school rolls, correct?

3 A. For some of them.

4 Q. Just fake, made up, right?

5 A. I would have no way of knowing that. It's also not
6 uncommon because there's no verification of the child's
7 name.

8 Q. Okay. The age macro. In fact, you saw spreadsheets
9 that randomly inserted a number between 7 and 17 in the age
10 column, correct?

11 A. Yes.

12 Q. You would agree that's suspicious, correct?

13 A. I would say that I hadn't seen that. It wouldn't have
14 been reviewed because it wasn't a requirement --

15 Q. Ms. Bock, I'm not asking you whether you reviewed them.
16 I'm asking -- you would agree, and maybe you wouldn't, but
17 do you agree that that would be suspicious?

18 A. If it was required, yes.

19 Q. Okay. Even if it wasn't required, if it was submitted
20 in support of a claim, you would agree it's suspicious,
21 correct?

22 A. They weren't submitted in support of a claim.

23 Q. Okay. They were just -- okay.

24 Certainly they were submitted to you along with
25 meal counts, correct?

1 A. Not to me directly. Very few came to me directly, but
2 they were submitted to Feeding Our Future.

3 Q. Okay. Now, Ms. Bock, this fraud was committed by
4 individuals and entities that were under the sponsorship of
5 your company, correct, Feeding Our Future?

6 A. Some of it.

7 Q. Okay. And you were the founder of Feeding Our Future?

8 A. I was.

9 Q. The executive director?

10 A. Correct.

11 Q. A member of the board of directors?

12 A. Yes.

13 Q. In fact, you were the only member of the board of
14 directors, correct?

15 A. No.

16 Q. Okay. You submitted all of the claims, you would agree?

17 A. Majority of them, yes.

18 Q. You went into CLiCS and actually submitted -- hit send,
19 correct?

20 A. Yes, I transferred the information.

21 Q. To MDE?

22 A. Correct.

23 Q. Essentially every claim, correct?

24 A. Yes, I would say that.

25 Q. So every time an entity under the sponsorship of Feeding

1 Our Future submitted meal counts or information, you would
2 go into CLiCS, correct?

3 A. Not every time.

4 Q. You would go into the system?

5 A. Once it had been processed and approved.

6 Q. And then you would hit submit to MDE, correct?

7 A. Yes. Once I reviewed the report and entered it in, yes,
8 there's a submit button.

9 Q. And when you did, you were certifying that those claims
10 were true and accurate; is that right?

11 A. Not in the way that's been presented. The certification
12 is that Feeding Our Future has reviewed those claims and
13 should we make a mistake, should we pay for a meal or snack
14 that, say, didn't have milk, Feeding Our Future is liable
15 for that. The responsibility for the site information lies
16 with the site.

17 Q. Well, let's take a look, Ms. Bock. This is Government
18 Exhibit V38. You recognize this form, don't you?

19 A. I do.

20 Q. This is the CLiCS system --

21 A. It is.

22 Q. -- where you submit the claims --

23 A. Yes.

24 Q. -- correct?

25 And this is a claim at page 1 here submitted by

1 Feeding Our Future, the sponsor?

2 A. That's correct.

3 Q. For the Safari Restaurant?

4 A. Yes.

5 Q. Here's the information that you are submitting, correct?

6 A. That is correct.

7 Q. Now, Ms. Bock, to be clear, when you submitted this, you
8 were saying that Safari Restaurant served these meals to
9 kids and were entitled to Federal Child Nutrition Program
10 reimbursements, correct?

11 A. I was saying that, yes, that the staff had verified the
12 information, processed the claim, and that those were the
13 numbers that were eligible.

14 Q. Okay. And when you did that every time, you signed
15 after -- you signed this certification, correct?

16 A. I did.

17 Q. And it begins, "I hereby take full responsibility for
18 ensuring that this claim accurately represents the number of
19 meals/milks served by reimbursement category, that records
20 are available to support this claim, that this claim is in
21 accordance with the program agreement, and that payment
22 therefore has not been received."

23 Is that right?

24 A. That's correct.

25 Q. So to be clear, for every single claim that Feeding Our

1 Future, your organization, submitted to MDE, you submitted
2 the claim in CLiCS, correct?

3 A. Correct.

4 Q. And you signed this certification form?

5 A. Yes, I certified that the meals and snacks -- the
6 reimbursement category is the free-reduced paid. So I
7 certified that they were being assigned appropriately.

8 Q. Is that a yes, Ms. Bock?

9 A. Yes, I certified what is being requested there.

10 Q. And you also said that -- in doing so, this is a quote,
11 "I understand" -- "I," that's you, correct?"

12 A. Correct.

13 Q. "I," Aimee Bock, "understand that this information is
14 being given in connection with the receipt of federal funds,
15 that officials of the U.S. Department of Agriculture and the
16 Minnesota Department of Education may verify this
17 information, and that deliberate misrepresentation may
18 subject me to prosecution under applicable state and federal
19 criminal statutes." Correct?

20 A. Yeah, that's what it says.

21 Q. So for every single claim that was submitted under the
22 sponsorship of Feeding Our Future, you signed this
23 certification like that; is that right? Yes or no. Yes or
24 no.

25 A. Yes, I signed it. And there was no deliberate

1 misrepresentation.

2 Q. And then after that the reimbursement funds, based on
3 your claims, were to get paid out by MDE to Feeding Our
4 Future, correct?

5 A. After they certified them to USDA, yes.

6 Q. And they did that based on your representation, correct?

7 A. They based it on whatever claims validation process they
8 used.

9 Q. Which, as you heard, is a -- you're supposed to retain
10 the records. They just do it, correct, they just take your
11 word for it upfront?

12 A. That is the decision they made, yes.

13 Q. And you took advantage of that system and you submitted
14 these, correct?

15 A. I did not.

16 Q. And every single time Feeding Our Future received funds
17 from MDE, those funds were paid out to the sites, correct --

18 A. As required by law, yes.

19 Q. -- entities?

20 And every single one of those checks was signed by
21 you, correct?

22 A. I was the signer on the bank account, yes.

23 Q. You were the only signer on the bank account?

24 A. Yes.

25 Q. So you signed the checks, correct?

1 A. Yes.

2 Q. Every single check, correct?

3 A. There were some signed by others, but, yes, I signed the
4 vast majority of them.

5 Q. Because you were the signatory on the account, correct?

6 A. Yes.

7 Q. So you submitted all the claims, correct?

8 A. Correct.

9 Q. You certified they were all accurate, correct?

10 A. I certified that information, yes.

11 Q. And you signed all the checks to the various sites?

12 A. Correct.

13 Q. And for doing that, you got to keep 10 percent --

14 A. I did not.

15 Q. -- of the funds, correct?

16 A. Feeding Our Future did.

17 Q. Feeding Our Future did.

18 So a total of \$240 million that Feeding Our Future
19 paid out, something like that?

20 A. Over the course of its existence, yes.

21 Q. All right. Let's talk about Feeding Our Future's
22 existence. Okay?

23 A. Okay.

24 Q. So you started Feeding Our Future some years ago,
25 correct?

1 A. Correct.

2 Q. And when you first started it, it was a small company,
3 right?

4 A. That's when it start, yes.

5 Q. You sponsored small daycares, correct?

6 A. The majority of them, yes.

7 Q. After-school programs?

8 A. Correct.

9 Q. Most of them had a couple dozen kids, something like
10 that?

11 A. Some had around a hundred, but yes.

12 Q. That was the high end, correct?

13 A. Yes.

14 Q. Attendance would fluctuate seasonally, yearly, day to
15 day?

16 A. What would?

17 Q. Attendance.

18 A. Attendance at child care centers, yeah, it would
19 fluctuate.

20 Q. Kids would be sick?

21 A. Yeah.

22 Q. On vacation?

23 A. Correct.

24 Q. They would just leave daycare for whatever reason?

25 A. Yeah.

1 Q. And that went on for a couple years, correct?

2 A. That's correct.

3 Q. That changed in April of 2020; is that right?

4 A. When the pandemic hit, yes.

5 Q. And almost immediately after the pandemic hit, you
6 enrolled different types of entities in the program; is that
7 right?

8 A. I did not enroll them.

9 Q. They enrolled under the sponsorship of Feeding Our
10 Future?

11 A. Some of them, yes.

12 Q. You submitted their information, their enrollment
13 applications, site ID applications to the Minnesota
14 Department of Education?

15 A. I submitted, yes, the site ID requests and the
16 application in CLiCS. However, there were other employees
17 that did applications.

18 Q. One of those sites -- one of the first sites that you
19 enrolled was Safari Restaurant; is that right?

20 A. That's correct.

21 Q. You enrolled it in the middle of April 2020; is that
22 right?

23 A. Sounds about right.

24 Q. Let's just take a look at it here.

25 I'm going to show you what's been admitted as

1 Government Exhibit B4. This is the application that you
2 submitted to MDE; is that right?

3 A. It's not an application. It's a site ID request.

4 Q. You called it a site application in the subject line,
5 though, correct?

6 A. Yes, indicating that there would be an application.

7 Q. All right. So using your words, you submitted the site
8 application for Safari Restaurant on April 13th, 2020; is
9 that right?

10 A. Correct.

11 Q. And you submitted that to the Minnesota Department of
12 Education?

13 A. Yes, to Kendra Pace.

14 Q. And then turning your attention to page 2, do you see
15 what we've got here? This is the first page of the
16 submission that you sent to MDE in April 2020, correct?

17 A. That's the -- yes, that's the form.

18 Q. The program name here is Safari; is that right?

19 A. Correct.

20 Q. And it looks like you submitted it here, Ms. Bock?

21 A. I did.

22 Q. And is this -- just to be clear, this is -- I assume
23 this is your handwriting here?

24 A. Yes.

25 Q. Okay. This is in the early days of COVID, right?

1 A. That's correct.

2 Q. And there's the stuff -- you filled out this form,
3 correct?

4 A. I filled in those portions, yes.

5 Q. All right. And it looks like here on page 9 of
6 Government Exhibit B4, Mr. Said signed on behalf of Safari
7 Restaurant; is that right?

8 A. That's what it says.

9 Q. All right. And that was in April of 2020, right?

10 A. Yes.

11 Q. Now, within a month or two that Safari site was claiming
12 to be serving meals to 6,000 kids a day; is that right?

13 A. That's correct.

14 Q. Two meals a day?

15 A. At the same time, yes.

16 Q. I'm showing you Government Exhibit B62. This is a
17 folder from Feeding Our Future that was recovered. This is
18 for the July 2020 Safari claims; is that right?

19 A. That is.

20 Q. Is that your handwriting?

21 A. I labeled the folder, yes.

22 Q. Okay. And here we go. It looks -- this is, on page 3,
23 meal counts starting July 5th, 2020; is that right?

24 A. Correct.

25 Q. For Safari Restaurant?

1 A. That's correct.

2 Q. It looks like your email is listed on it?

3 A. It was.

4 Q. Aimee@feedingourfuture?

5 A. Yes.

6 Q. And every single day was 5,000 meals and essentially
7 99.9 percent attendance; is that right?

8 A. No, this doesn't indicate attendance. It indicates the
9 number of meals being distributed. It was likely to
10 different individuals.

11 Q. Okay. So every day it was somewhere between 400 --
12 4,989 meals distributed, or kids receiving meals, to 4,996;
13 is that right?

14 A. That was common with home delivery because even if they
15 are sick or have COVID, the food would be brought to their
16 door.

17 Q. Okay. That's strange you say that because it says here
18 the number of children requesting meals after the food is
19 gone every day lists some number of kids; is that right?

20 A. Yeah. Again, that's common because --

21 Q. Ms. Bock, I didn't ask you whether that's common. I
22 asked whether that's what it says.

23 A. That is what it says.

24 Q. Okay. And who signed this form?

25 A. It looks like Salim Said.

1 Q. Okay. And this goes on. That one was for breakfast.

2 Also the same number for lunch; is that right?

3 A. They're passed out together, so, yeah, the number would
4 match.

5 Q. Were you there Ms. Bock? Were you at Safari?

6 A. I visited there.

7 Q. Okay. Were you there here --

8 A. At this time?

9 Q. -- on July 2020?

10 A. I was. MDE conducted a site visit there.

11 Q. Were you there July 5th, 2020?

12 A. I don't recall the date.

13 Q. Okay. Here, June 28th, same number, 5,000 a day,
14 correct?

15 A. That was prepared, yes.

16 Q. Okay. Day after day, correct?

17 A. Yes.

18 Q. And that's a pretty extraordinary number, you would
19 agree, Ms. Bock?

20 A. Now, yes. At that time, no.

21 Q. You had never once at Feeding Our Future seen a site do
22 anything like that, correct?

23 A. We had never had a site --

24 Q. Ms. Bock, had you ever had a site like that before?

25 A. No.

1 Q. Never.

2 You said the biggest you had was like a hundred,
3 correct?

4 A. At a child care center, yes.

5 Q. Okay. In fact, there is not a single high school in the
6 state anywhere near that size, is there?

7 A. I don't -- I will take your word. Honestly, I don't
8 know.

9 Q. Okay. I'm showing you now Government Exhibit B63. Go
10 to the first page. This is a folder for the August 2020
11 Safari claims, correct?

12 A. It is.

13 Q. And, again, is that your handwriting on the front?

14 A. I did label the folder.

15 Q. Now, I know, Ms. Bock, you had said earlier, you had
16 made clear you didn't look at the meal counts; is that
17 right?

18 A. I didn't.

19 Q. That's what your testimony was?

20 A. Yes.

21 Q. But it is your handwriting on the folder in which these
22 meal counts were kept; is that right?

23 A. Yes.

24 Q. Okay. And directing your attention to page 14, these
25 are the meal counts for August 2020 for the Safari site; is

- 1 that right?
- 2 A. It is.
- 3 Q. Again, 5,000 a day?
- 4 A. Correct.
- 5 Q. Every day?
- 6 A. Yep.
- 7 Q. Person taking the daily meal count is Salim Said?
- 8 A. If -- it's SS. I --
- 9 Q. How about down here on the left, the signature?
- 10 A. The signature is.
- 11 Q. That's Defendant Salim Said?
- 12 A. It is.
- 13 Q. Now, you know him, correct?
- 14 A. Not -- I know him as well as I know any site.
- 15 Q. I mean, he came to your office regularly to pick up
- 16 checks, correct?
- 17 A. Those were at the lobby, not where I was.
- 18 Q. You are saying you never met with him?
- 19 A. I'm not saying that. I didn't say that.
- 20 Q. So you do know him and you did meet with him, correct?
- 21 A. I have met with him. I wouldn't say I know him.
- 22 Q. Okay. All right. These go on day after day, 5,000,
- 23 5,000, 5,000, correct?
- 24 A. Correct.
- 25 Q. And, again, I'm -- I just want to make sure I understand

1 your testimony here.

2 A. Okay.

3 Q. Because earlier you went on and on about how -- all the
4 investigating you did, right?

5 A. Mm-hmm.

6 Q. And you found sites that you thought were suspicious and
7 you did everything you could to root out the fraud,
8 something like that, correct?

9 A. Yes, we caught and reported fraud.

10 Q. Now, these alone, though -- are you suggesting -- and
11 you've said again and again that you didn't see the meal
12 counts, correct?

13 A. Correct.

14 Q. And I assume you said that because you think these are
15 suspicious; is that right?

16 A. Absolutely not.

17 Q. You don't think they're suspicious at all?

18 A. At that time --

19 Q. No, I didn't ask for that time. I'm asking right now as
20 you sit there.

21 A. No, I do not -- from August of 2020, I don't think
22 they're suspicious based on themselves. It would depend on
23 what the other documentation indicated.

24 Q. Okay. And you certainly know here that Mr. Said went on
25 a wild real estate spending spree with this money, correct?

1 A. I know that he spent money, yes.

2 Q. Okay. All right. So every one of these claims you
3 submitted, correct?

4 A. If they were approved, yes.

5 Q. CLiCS. You submitted them, correct?

6 A. I entered them into CLiCS if they were approved.

7 Q. Okay. You certified that they were accurate?

8 A. I certified that I had the records available and that
9 they were classified in the correct category.

10 Q. So I'm going to go back to Government Exhibit V38 at
11 page 2, which is the Safari CLiCS submissions for July 2020,
12 correct?

13 A. Correct.

14 Q. And this is the 154,000 lunches and 154,000 morning
15 snacks, correct?

16 A. That's correct.

17 Q. This is a -- you submitted this, correct?

18 A. I did.

19 Q. And you said that they accurately represent the number
20 of meals and that records are available to support this
21 claim; is that right?

22 A. Meals serve by reimbursement category, correct.

23 Q. Those records being the meal counts; is that right?

24 A. Records to support the claim would --

25 Q. Ms. Bock, the meal counts, correct, as some of the

1 records?

2 A. That would be a portion of them, not their entirety.

3 Q. In fact, the number actually submitted is based on the
4 meal counts, correct?

5 A. Of the meal counts that have been approved, yes.

6 Q. That's where you get this number that you put in when
7 you entered into CLiCS, correct?

8 A. I get it from the report in CenterPilot, yes.

9 THE COURT: Mr. Thompson --

10 MR. THOMPSON: Yes.

11 THE COURT: -- we need to take a morning break.

12 MR. THOMPSON: That's fine, Your Honor.

13 THE COURT: Okay. We'll come back at 11:00.

14 All rise for the jury.

15 10:40 a.m.

16 **IN OPEN COURT**

17 **(JURY NOT PRESENT)**

18 THE COURT: Court is in recess until 11:00 a.m.

19 (Recess taken at 10:40 a.m. till 11:00 a.m.)

20 11:00 a.m.

21 **IN OPEN COURT**

22 **(JURY PRESENT)**

23 THE COURT: You may all be seated.

24 Mr. Thompson, you may continue.

25 MR. THOMPSON: Thank you, Your Honor.

1 BY MR. THOMPSON:

2 Q. Welcome back, Ms. Bock.

3 A. Thank you.

4 Q. When we left off, we were talking about Safari
5 Restaurant and we were looking at some of the meal counts.

6 And specifically here, we're looking at Government
7 Exhibit B62, which is a folder that you labeled "FY20, July,
8 Safari," correct?

9 A. That's correct.

10 Q. Your handwriting?

11 A. It is.

12 Q. Directing your attention to page 8 and 9, we see the
13 meal counts for the month of July that are signed by Salim
14 Said; is that right?

15 A. Yes.

16 Q. Essentially just a few kids under 5,000 a day, seven
17 days a week, correct?

18 A. Correct.

19 Q. And similar -- there were similar numbers for
20 August 2020, is that right --

21 A. Yes.

22 Q. -- that we looked at?

23 A. Yeah.

24 Q. And that's Government Exhibit B63. Again, a folder
25 labeled -- that you labeled in your handwriting "FY20,

1 August, Safari," correct?

2 A. Correct.

3 Q. And if we look here at pages 15, 16, again, 5,000 a day
4 seven days at week at Safari Restaurant, correct?

5 A. Prepared, yes.

6 Q. Now, those were signed by Salim Said, your codefendant
7 on trial with you here today; is that right?

8 A. Yes.

9 Q. So each of these claims, these came to your office, they
10 were sent to you?

11 A. I don't know that they were sent to me.

12 Q. Okay. You saw them?

13 A. Not that I recall.

14 Q. They were in the folder that you labeled?

15 A. I labeled the folders at the start of the month.

16 Q. And based on these meal counts, you submitted the claims
17 to MDE, correct?

18 A. Based on the information approved in CenterPilot, I
19 submitted it to --

20 Q. And the number is -- again, I think we had heard about
21 this -- you said earlier, based on the meal count numbers,
22 correct?

23 A. Based on meal counts and other information, yes.

24 Q. But the numbers come from meal counts, though?

25 A. The initial numbers, but there's disallows that occur.

1 Q. All right. And so for each of these months for Safari,
2 you submitted them in CLiCS?

3 A. I believe so, yeah.

4 Q. Signing that certification that we looked at before?

5 A. Yep, that they were the right category.

6 Q. And then after -- MDE paid out those reimbursement
7 funds, correct?

8 A. Yes.

9 Q. Based on the claims that you submitted?

10 A. Yeah, based on whatever their review process was.

11 Q. And then you paid out the money, correct?

12 A. I wrote the checks, yes.

13 Q. Okay. And let's talk about the checks that you wrote.

14 Here I'm going to show you what's been admitted as
15 Government Exhibit B13. And this is an email to you from
16 Abdikerm Eidleh; is that right?

17 A. It is.

18 Q. That's your employee?

19 A. Yes, consultant?

20 Q. He uses an email address eidleh@feedingourfuturemn.org?

21 A. Correct.

22 Q. That's your entity?

23 A. It's the nonprofit I worked at.

24 Q. You ran, you founded it?

25 A. I founded it, yes.

1 Q. Okay. And it's sent to you,
2 aimee@feedingourfuturemn.org, correct?

3 A. That's correct.

4 Q. And then also salimsaid4040@gmail.com. That's Defendant
5 Said, correct?

6 A. Yes.

7 Q. Okay. The subject line here is "Safari Direct Deposit
8 Accounts." And Mr. Eidleh writes, "Hello Aimee. Here's the
9 instructions you were waiting from Safari. \$200,000 in each
10 of the three accounts."

11 Is that right?

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

13 Q. "The rest goes to the Cosmopolitan account."

14 A. Correct.

15 Q. And the primary email is salimsaid4040@gmail.com?

16 A. Yes.

17 Q. Do you recognize that email address?

18 A. I mean, yes, I know it's his.

19 Q. Okay. And so Mr. Eidleh in this email is directing you
20 to split up the Federal Child Nutrition Program
21 reimbursement funds that were resulting from these Safari
22 meal claims, correct?

23 A. He was providing instructions so that the payments could
24 be made within five days, as required by law, due to banking
25 limitations.

1 Q. Okay. In any event, you split them up four different
2 ways, correct --

3 A. Yes.

4 Q. -- the payments?

5 And the first payment -- there was 200,000 each to
6 three different accounts, correct?

7 A. Yes.

8 Q. And the first one is an account called Afra Grill LLC;
9 is that right?

10 A. Oh. Yeah, I didn't see that. Yeah.

11 Q. In Columbus, Ohio?

12 A. Correct.

13 Q. And that's an entity owned by Abdirahman Ahmed; is that
14 right?

15 A. Yeah, that's what I've seen here.

16 Q. One of the partners in Safari Restaurant?

17 A. Correct.

18 Q. So you were going to pay him \$200,000 of the funds for
19 Safari Restaurant?

20 A. No. We had discussed with MDE how to comply with the
21 five-day rule because --

22 Q. Ms. Bock, I didn't ask --

23 (Simultaneous indiscernible crosstalk)

24 A. -- transfer limit.

25 Q. Ms. Bock, I didn't ask about --

1 MR. UDOIBOK: Objection. Badgering.

2 THE COURT: Overruled.

3 BY MR. THOMPSON:

4 Q. I didn't ask about your conversations with MDE. I'm
5 asking you about this email you received from Abdikerm
6 Eidleh --

7 A. Yes, this was --

8 Q. -- a Feeding Our Future employee, correct?

9 A. Correct.

10 Q. Okay. He's saying -- he's giving you instructions about
11 how to wire the money, correct?

12 A. How to ensure the payment is made on time.

13 Q. And they were -- the instructions you were waiting on
14 were coming from Safari; is that right?

15 A. Correct.

16 Q. And specifically Salim Said?

17 A. That's the primary email. I don't know that he's the
18 one that gave the direction.

19 Q. He's the one on the email account, correct?

20 A. He was copied, yes.

21 Q. Okay. And it instructs you -- this is the funds from
22 the Federal Child Nutrition Program, correct?

23 A. Correct.

24 Q. For meals purportedly served at Safari Restaurant?

25 A. Correct.

1 Q. And so the money is not all being paid to Safari
2 Restaurant, correct?

3 A. (No response.)

4 Q. Correct?

5 A. Due to banking limits and the regulations --

6 Q. Ms. Bock, I'm not --

7 A. -- they were split between Safari and the owners.

8 Q. And the instructions that Mr. Eidleh passed on to you
9 from Salim Said, correct? Correct?

10 A. The instructions he passed on.

11 Q. Okay. And so the first \$200,000 went to a company in
12 Columbus, Ohio, correct?

13 A. It went to a co-owner of Safari.

14 Q. Okay. You know the co-owner, Abdirahman Ahmed?

15 A. I do not know him. I've never met him. Well, I've seen
16 him now in court, but I know he's a co-owner.

17 Q. Okay. And his company is called Afra Grill?

18 A. One of them, yes.

19 Q. But you sent \$200,000 to this Ohio-based LLC, Afra Grill
20 correct?

21 A. I issued the payment on time within five days. Due to
22 banking limits, it went to the owner's --

23 Q. Ms. Bock, it's a very simple question. Did you pay
24 \$200,000 to this Columbus, Ohio based LLC. Yes or no?

25 A. I paid it to on owner of Safari.

1 Q. Okay. And then you also paid \$200,000 to an entity
2 called 3017 LLC; is that right?

3 A. To another owner of Safari.

4 Q. That's Abdulkadir Salah, correct?

5 A. Yes, I think so.

6 Q. He has a nickname; is that right?

7 A. Yeah.

8 Q. What do they call him?

9 A. They call him Fish.

10 Q. You know his nickname?

11 A. I know his real name too. I was not connecting, if it
12 was 3017, that was him.

13 Q. So rather than pay this \$200,000 to Cosmopolitan
14 Business Solutions, the entity that owns Safari Restaurant,
15 you paid it to Fish's LLC, 3017, correct? Yes or no.

16 A. It was not a rather than, no.

17 Q. Is that where you paid it?

18 A. To one of the owners of Safari, yes.

19 Q. Okay. And then you also paid \$200,000 to an entity
20 called Salim Limited; is that right?

21 A. Yes, the owner of Safari.

22 Q. That's Salim Said's company, correct?

23 A. It is.

24 Q. And then the balance of the money was paid to
25 Cosmopolitan; is that right?

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

2 Q. If I remember correctly, that was about \$166,000. Does
3 that sound right to you?

4 A. I will trust you. I don't recall.

5 Q. So three-quarters of the money, roughly, goes to the
6 three owners of Safari Restaurant and a little less than a
7 fourth of it goes to the restaurant itself, correct? Yes or
8 no.

9 A. The reimbursement was split, yes.

10 Q. Okay. And, in fact, that happened routinely when Safari
11 Restaurant first entered the program; is that right?

12 A. While we banked with Azlo, yes.

13 Q. Each month you would sent the money to different --
14 these different entities, correct?

15 A. Yes, because we had to comply with the five-day limit.

16 Q. Okay. Now, Ms. Bock, we looked at some of the meal
17 counts for Safari Restaurant. They were 5,000 a day, the
18 ones we just looked at, correct?

19 A. Correct.

20 Q. Later on it's 6,000 a day?

21 A. For a period.

22 Q. And every time you got those things, you submitted the
23 claims; is that right?

24 A. After they were reviewed and approved.

25 Q. And every time you submitted them in CLiCS, you signed

1 that certification; is that right?

2 A. That it was the right reimbursement category and that we
3 had the documentation available, yes.

4 Q. Now, altogether, Ms. Bock, you paid Safari Restaurant
5 over \$12 million in Federal Child Nutrition Program funds;
6 is that right?

7 A. Not me personally. Feeding Our Future did, yeah.

8 Q. I mean, you signed the checks --

9 A. Yes, I --

10 (Simultaneous indiscernible crosstalk)

11 A. Yes, yes, I signed the checks.

12 Q. Okay. You signed 12 million dollars' worth of checks
13 directly to Cosmopolitan Business Solutions, a/k/a Safari
14 Restaurant, correct?

15 A. Correct.

16 Q. Based on those claims that we saw; is that right?

17 A. Based on what my staff approved for payment, yes.

18 Q. Okay. And those claims that you submitted claimed that
19 Safari Restaurant at its site alone distributed 3.9 million
20 meals in 2021 and -- 2020 and 2021; is that right?

21 A. Again, I'll take your word for it. I haven't done the
22 math, but yes.

23 Q. Now, Salim Said and his co-owners in Safari didn't just
24 do that site; is that right?

25 A. Correct.

1 Q. In fact, they opened up a number of other sites around
2 the state of Minnesota; is that right?

3 A. Yes.

4 Q. Okay. And, in fact, they started -- pretty quickly
5 after you started paying them that money, they opened up
6 additional sites; is that right?

7 A. Additional sites were opened. I did not initially know
8 there was an affiliation.

9 Q. I'm sorry. You didn't know there was an affiliation?

10 A. Not that I recall.

11 Q. All right. Are you sure? You didn't know that those
12 sites were affiliated with Safari Restaurant?

13 A. At the time of application, I don't believe I did. I
14 said I learned. I did learn that they were affiliated, but
15 at the time that the site was being added, I don't believe
16 that I knew.

17 Q. Okay. Well, let's talk about the first one. Okay?

18 A. Okay.

19 Q. All right. The first one that they opened was called
20 ASA Limited; is that right?

21 A. Yeah.

22 Q. And that was a site that purportedly operated in
23 St. Paul?

24 A. Yes.

25 Q. And it was -- I'll show you here on Government

1 Exhibit C1. This was an entity that was created --
2 registered with the Minnesota Secretary of State on
3 September 4th, 2020; is that right?

4 A. Correct.

5 Q. Okay. And four days later, on September 8th, 2020, you
6 submitted a site application for ASA Limited LLC, correct?

7 A. I submitted a site application. We don't review
8 Secretary of State filings, so I wouldn't know how long the
9 business had existed.

10 Q. You didn't know that the company had just been created
11 to be enrolled in the program?

12 A. No. We did not review Secretary of State filings.

13 Q. Okay. That's your handwriting here at page 2 of
14 Government Exhibit C2?

15 A. Yep.

16 Q. The submission to open a site in the name of this new
17 entity, ASA Limited LLC?

18 A. Yes, those were the documents submitted.

19 Q. And I'm directing your attention to page 6, which is the
20 first page of the agreement --

21 A. Mm-hmm.

22 Q. -- to join the Child and Adult Care Food Program for ASA
23 Limited; is that right?

24 A. It is.

25 Q. And this is the document that you emailed to MDE,

1 correct?

2 A. Yes, this was included in the submission.

3 Q. And I'm looking here at the top, and it says, "Agreement
4 between Feeding Our Future and Salim Limited LLC," but
5 "Salim" is crossed out and then it says, "ASA"; is that
6 right?

7 A. It does.

8 Q. Then it says at the top, "Change Salim to ASA"?

9 A. Yep.

10 Q. That's your handwriting?

11 A. No.

12 Q. It's not your handwriting.

13 Your email, though?

14 A. Yes.

15 Q. Okay. And the document itself talks about Salim
16 Limited. At times it's whited out and other times it's not,
17 correct?

18 A. Yeah.

19 Q. Now, Ms. Bock, you submitted this to MDE, correct?

20 A. Correct.

21 Q. And you knew what Salim Limited was, correct?

22 A. Yes, I knew that it was an -- yes.

23 Q. So when I asked you earlier whether or not you knew this
24 site was affiliated with Salim Said, that wasn't true, was
25 it?

1 A. I said not that I recall, and I don't recall this having
2 said, "Salim Limited." But, yes, they were affiliated.

3 Q. Okay. But presumably you knew that at the time because
4 you crossed it off, correct?

5 A. That's not my writing.

6 Q. Someone crossed it off?

7 A. Someone crossed it off.

8 Q. Page 2 -- page 7, is that your writing?

9 A. That is.

10 Q. Okay. The next page of the document --

11 A. Mm-hmm.

12 Q. -- where it says, "ASA Limited." And right below there
13 again it talks about Salim Limited --

14 A. It does.

15 Q. -- joining the program, correct?

16 A. Yep.

17 Q. Salim Said's entity?

18 A. Correct.

19 Q. Who is already serving 5,000 kids a day seven days a
20 week two meals a day at Safari Restaurant --

21 A. Yes.

22 Q. -- that Salim Limited, that Salim Said?

23 A. Yes, Safari Restaurant.

24 Q. The start date of this contract is September 4th, 2020;
25 is that right?

1 A. Yes.

2 Q. That's the same day that ASA Limited was registered with
3 the Minnesota Secretary of State; is that right?

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

5 Q. Okay. I'm showing you now what's been admitted as
6 Government Exhibit C38. This is the ASA Limited claims
7 folder from Feeding Our Future, correct?

8 A. Correct.

9 Q. That's your handwriting at the top labeling the folder?

10 A. Like I said, I labeled the folders at the start of the
11 month so they could be filed as it was received.

12 Q. I'm directing your attention to page 5. It looks like
13 by November the site is serving 3,000 a day, is that right,
14 in November 2020?

15 A. They're preparing 3,000. They're serving, yeah, around
16 3,000.

17 Q. Okay. In fact, I actually skipped the first one. C37,
18 that's the October ASA Limited claims, correct?

19 A. Yep.

20 Q. Your handwriting?

21 A. I labeled the folder, yep.

22 Q. And it looks like starting on October 1st, 2020, ASA
23 Limited was serving 3,000 kids a day; is that right?

24 A. Approximately, yes.

25 Q. That's, what, three or four weeks after the entity was

1 registered with the Minnesota Secretary of State; is that
2 right?

3 A. The time it was registered, yes.

4 Q. Three or four weeks after -- only three or four weeks
5 after you submitted an application to enroll in the program
6 under the sponsorship of Feeding Our Future?

7 A. Correct.

8 Q. The very first day, 2,996 kids showed up to get their
9 meals; is that right?

10 A. That's what it says.

11 Q. And the next day 2,998?

12 A. That's what this shows.

13 Q. Immediately?

14 A. That's what this form indicates, yes.

15 Q. And that continues day after day, as I page through
16 Government Exhibit C37, in October of 2020, correct?

17 A. Correct.

18 Q. You submitted -- based on these meal counts, you
19 submitted a claim to MDE for Federal Child Program --
20 Federal Child Nutrition Program reimbursements for these
21 meals purportedly served at the ASA Limited site?

22 A. It was based on what was reviewed and approved by the
23 staff, as well as the CenterPilot program.

24 Q. Okay. And, of course, the numbers come from these meal
25 counts, correct?

1 A. The numbers that they input into CenterPilot, yes.

2 Q. That were in the folder that you labeled "FY21, October,
3 ASA Limited"?

4 A. In the folder that was labeled, yes.

5 Q. Okay. And you signed that certification; is that right?

6 A. Certifying that they were all classified correctly and
7 the records were available.

8 Q. Okay. Now, you saw these counts, correct?

9 A. I did not, not that I recall.

10 Q. They were emailed to you, were they not?

11 A. They may have been.

12 Q. I'm showing you now -- hold on. There's other ones.

13 Government Exhibit C18 is other ASA counts that
14 were emailed to you, correct?

15 A. I was the recipient, but I didn't review them.

16 Q. When you got meal counts in an email, which you did, you
17 didn't look at them; is that what you are saying?

18 A. I would look at it as long as the claims was on there.

19 I would then check the body of the email to see if there was
20 specific questions or something that was being asked of me.

21 If claims was already on the email, I would disregard it and
22 file it away. If claims was not, then it would be forwarded
23 to claims.

24 Q. Okay. But if they were emailed to you, you just didn't
25 look? You never noticed that these claims were wild?

1 A. They weren't wild at the time.

2 Q. No. You thought 3,000 kids showing up on day one and
3 then every day afterwards was normal; is that what your
4 testimony is, that was expected?

5 A. It's not necessarily day one. Individuals had community
6 relationships, partnered with their mosques. It may have
7 been the first claim and the day that they served, but that
8 didn't mean that they didn't already have existing
9 relationships.

10 Q. I'm just saying that the entity had only been around for
11 three weeks.

12 A. It had been registered for three weeks. I don't know if
13 it had been -- if they had been working on it prior.

14 Q. You are not saying that that happened, though?

15 A. I don't know either way. Like I said, I didn't check
16 the Secretary of State filings.

17 Q. In fact, it looked like the day they enrolled they
18 thought it was going to be called Salim Limited; is that
19 right?

20 A. I don't know if that's what they thought or if it was an
21 application that was saved. It was a [indiscernible] and
22 replace, so sometimes it would be --

23 COURT REPORTER: It was a what and replace?

24 THE WITNESS: Find and replace. They would
25 replace the names. So I don't know if one had been -- I

1 don't what happened.

2 BY MR. THOMPSON:

3 Q. Did Salim Limited have a site under the sponsorship of
4 Feeding Our Future?

5 A. No.

6 Q. So it couldn't have been a find and replace an old one?

7 A. It may have been an intent to set one up that never
8 moved forward. I don't know.

9 Q. Okay. So it could have been that Salim Said was trying
10 to open a site in the name of his LLC, Salim Limited, and
11 changed his mind and decided to put it in the name of a new
12 LLC, ASA Limited; is that what you are saying?

13 A. I don't know what happened because, like I said, I was
14 not involved in this process.

15 Q. I'm sorry. You -- looking at Government Exhibit C2, you
16 literally were involved in the process. You submitted the
17 site application --

18 A. I was --

19 Q. -- for ASA Limited.

20 A. I was not involved in the pre-operational collection of
21 documents. I occasionally would do it. Once it was
22 returned to the office, I would compile it, review it, and
23 submit it to MDE.

24 Q. But you filled out the form is what I'm asking.

25 A. Well, this is the cover sheet, yes.

1 Q. Okay. And you signed the form, directing your attention
2 to page 12, correct?

3 A. Yeah. Like I said, my signature is preprinted on those.

4 Q. That's your handwriting, the date, 9/4/20, correct?

5 A. Yes.

6 Q. So you filled this out?

7 A. I dated it when I received it.

8 Q. And you -- I assume you looked at it?

9 A. I honestly generally didn't because the terms never
10 change and so I'm familiar with it.

11 Q. You filled in the address at page 7 here, correct?

12 A. Yeah, we make sure the address is on there --

13 Q. That's your handwriting. Okay.

14 A. -- but I don't read all of it.

15 Q. Okay. Now, based on those claims we looked at, you
16 submitted claims through CLiCS, correct?

17 A. Yeah.

18 Q. You certified they were accurate and asked for
19 reimbursement, correct?

20 A. I certified that they were categorized correctly, the
21 paperwork was available. I also certified that I was not
22 deliberately submitting misinformation, yes.

23 Q. Okay. And then after those funds were received, you cut
24 checks, correct?

25 A. I reimbursed the programs, yes.

1 Q. And just turning your attention here to page 37 of
2 Government Exhibit W14, here's the check for November of
3 2020 to ASA Limited, correct?

4 A. Correct.

5 Q. You paid them \$532,000 that month, correct?

6 A. A reimbursement was issued for that amount, yes.

7 Q. Okay. When you say "was issued," it's a check that you
8 signed, correct?

9 A. Yes. The money came from MDE and so I, by law, have to
10 issue it to them.

11 Q. And on page 38, on January 14th you cut another check to
12 ASA Limited; is that right?

13 A. Yes. It would be every month that they were
14 participating.

15 Q. And that was a check for \$549,000, correct?

16 A. This one, yes.

17 Q. And ASA Limited, you are aware that this is -- Salim
18 Said is a partner in this entity as well, correct?

19 A. I knew he was involved. I honestly didn't know that --
20 I assumed he was a partner, but I didn't know ASA was his
21 initial or anything like that.

22 Q. The "S" is for Salim Said, correct?

23 A. Yeah, I learned that later.

24 Q. Okay. So you are cutting him -- in addition to the
25 checks you were cutting to his Safari Restaurant and Salim

1 Limited, you were cutting checks to this other entity
2 involved, ASA Limited, correct?

3 A. Yeah, checks are paid to the vendor.

4 Q. Okay. There was another site, correct, that was opened
5 around that same time?

6 A. I don't know the timings, but, yes, there were other
7 sites opened.

8 Q. Olive Management?

9 A. Yes.

10 Q. Another site that Salim Said was involved in?

11 A. I don't know his involvement in it.

12 Q. You don't know his involvement in it?

13 A. No. I knew it was part of the people he knew, but I
14 didn't know if he had direct involvement in it.

15 Q. All right. Let's -- we'll get to that in a second.
16 Before we do, let's just talk about this site.

17 Olive Management -- I'm showing you Government
18 Exhibit E1 -- was registered with the Secretary of State on
19 September 7, 2020; is that right?

20 A. It is.

21 Q. That's three days after ASA Limited was registered; is
22 that right?

23 A. That's what the records show.

24 Q. And you -- the very next day you submitted an
25 application to enroll the program in the Federal Child

1 Nutrition Program fund, is that right, the Federal Child
2 Nutrition Program?

3 A. I don't know the date.

4 Q. Okay.

5 A. But I will -- yes, a site ID request was submitted and
6 then an application into CLiCS, but I don't know the date
7 off the top of my head.

8 Q. Okay. I'll show you Government Exhibit E3. Is this the
9 email you sent to MDE submitting a site application for
10 Olive Management?

11 A. Yes. It says, "site application," but like I said, it
12 is a site ID request.

13 Q. You just called it at the time a site application?

14 A. It was an indication that it was a site intending to
15 apply.

16 Q. Okay. And then on page 2, the first page that you
17 submitted here, you -- that's your handwriting, "Olive
18 Management Inc."?

19 A. Yep, I filled out that checklist.

20 Q. And then you signed it --

21 A. Mm-hmm.

22 Q. -- Aimee Bock?

23 A. Correct.

24 Q. Your signature on this document, correct?

25 A. Which document? The --

1 Q. On all of it. You signed it --

2 A. On that one, yes.

3 Q. -- correct?

4 A. Yes.

5 Q. Okay. And, again, this is -- looks like it was
6 submitted on September 9th, 2020; is that right?

7 A. Yeah. Yep, that's --

8 Q. Okay. And then within three weeks this Olive Management
9 site was claiming to serve 3,000 kids a day every single
10 day; is that right?

11 A. I will take your word for it. I don't know off the top
12 of my head, but I'm sure that's what their meal counts say.

13 Q. All right. Well, on the left side of this screen is
14 your site application --

15 A. Yep.

16 Q. -- E3?

17 And on the right side of the screen is Government
18 Exhibit E41, which is another file found at Feeding Our
19 Future; is that right?

20 A. It is.

21 Q. And this is for the October 2020 claims for that new
22 Olive Management site?

23 A. Yes.

24 Q. Which was located in St. Cloud, Minnesota?

25 A. Yes.

1 Q. And, again, the writing on the folder there is your
2 handwriting, correct?

3 A. Yeah. Like I said, I pre-label the folders so that when
4 information would come in, it would be filed.

5 Q. I understand what you are saying. I'm just pointing out
6 that that's your handwriting.

7 A. Well, yeah, it is.

8 Q. Okay. The same handwriting that was on the site
9 application, correct?

10 A. The address, yes.

11 Q. And if I look here, on the right side of your screen is
12 the initial meal counts for this Olive Management site
13 starting on October 1st, 2021, so about three weeks after
14 you submitted an enrollment for Olive Management to join the
15 program, correct?

16 A. Yes.

17 Q. And three weeks after the company was registered with
18 the Minnesota Secretary of State?

19 A. Again, I don't -- didn't review those records, but, yes,
20 that's what you've shown.

21 Q. Okay. And starting day one it's 3,000 meals a day,
22 correct?

23 A. Correct.

24 Q. Breakfast and lunch?

25 A. Yes.

1 Q. Seven days a week?

2 A. Correct.

3 Q. No ramp-up period, correct?

4 A. Not as indicated in the meal counts. However, there
5 could have been advertising and work being done prior to
6 opening.

7 Q. You're saying during that three-week period after it was
8 registered?

9 A. I'm not. I've owned businesses and I've often started
10 doing the work sometimes up to a year before I register it.

11 Q. Did 3,000 kids show up on day one?

12 A. I didn't open a site.

13 Q. Well, you did. We'll talk about that later.

14 A. Feeding Our Future did, correct.

15 Q. Okay. Did they have a similar pattern of the maximum
16 number of kids showing up on day one at the Feeding Our
17 Future run sites?

18 A. At day one, no.

19 Q. All right. Here I'm directing your attention to
20 Government Exhibit E42, which is the November 2020 Olive
21 Management counts; is that right?

22 A. Yes.

23 Q. Similar pattern? 3,000 a day?

24 A. Correct.

25 Q. Again on the folder that you conveniently labeled,

1 correct?

2 A. Yes. All of the folders would likely have my
3 handwriting.

4 Q. Government Exhibit E43, December?

5 A. Yes.

6 Q. And at page 4 we see again -- in December 2020 this
7 newly created Olive Management site 3,000 a day, breakfast
8 and lunch, correct?

9 A. That's what it shows, yeah.

10 Q. Now, based on these claims, these meal counts, you
11 submitted the claims in CLiCS, correct?

12 A. The information, like I said, is approved by the staff,
13 reviewed by the staff; entered to CenterPilot, which does
14 its edit checks; and then I enter those final numbers into
15 CLiCS.

16 Q. The numbers -- of course, these are the numbers in the
17 meal counts, correct?

18 A. Right. It doesn't mean that there wasn't disallows.

19 Q. Okay. You are not saying you didn't for these months,
20 right?

21 A. I don't know because it's handled within CenterPilot and
22 I don't get that information on my report.

23 Q. We'll look at the checks in a second.

24 But you submitted those claims in CLiCS so that
25 MDE would send Federal Child Nutrition Program reimbursement

1 funds to Feeding Our Future, correct?

2 A. I submitted it so that MDE would verify and submit to
3 USDA to access the funds.

4 Q. Okay. But the funds were received by Feeding Our
5 Future. You knew -- that's what you wanted to have happen,
6 correct?

7 A. That's what the program is.

8 Q. Okay. And then after you did that, you clicked that
9 certification form we talked about correct?

10 A. Yes, certifying that they were in the right categories,
11 we had the paperwork, and that I was not deliberately or
12 intentionally entering wrong information.

13 Q. The paperwork being what we're looking at right here at
14 Government Exhibit E43, that's the paperwork you are talking
15 about?

16 A. That it was available and on file at Feeding Our Future,
17 yes.

18 Q. Okay. And then you wrote the checks, correct?

19 A. I was the one with the bank account and signature, so,
20 yes, I did.

21 Q. I'm going to show you here Government Exhibit W34 at
22 page 128, which is one, if not the first check that you
23 wrote to Olive Management; is that right?

24 A. I don't know if it was the first one, but, yeah, I will
25 take your word.

1 Q. It's certainly a significant one, no?

2 A. It is.

3 Q. So this is December 29, 2020, so about three months
4 after the company was registered with the Secretary of
5 State, correct?

6 A. Correct.

7 Q. A couple months after it started submitting claims?

8 A. Yes.

9 Q. What was the amount of the check that you wrote to Olive
10 Management on December 29th, 2020?

11 A. This check was for a couple months combined, so it was
12 \$1,135,171.84.

13 Q. I'm just going to page down two pages in the Olive
14 Management bank account. Two weeks later you wrote another
15 check to Olive Management on January 14th, 2021; is that
16 right?

17 A. Yes. The first check would have been for October,
18 November and this would be the check for December.

19 Q. How much did you pay to Olive Management based on meals
20 purportedly served in December 2020 in St. Cloud, Minnesota?

21 A. \$549,950.

22 Q. And showing you on the left Government Exhibit E43 at
23 page 6, those are the meal counts supporting that \$549,000
24 check, correct?

25 A. Correct.

1 Q. All right. On the right side of the screen I'm going to
2 page down to the next check deposited into the Olive
3 Management account, which is on Government Exhibit W34 at
4 page 132. February 12th, 2021, correct?

5 A. Yes.

6 Q. You wrote this check to Olive Management?

7 A. Correct.

8 Q. For claims submitted for January 2021?

9 A. Yes.

10 Q. What was the amount of this check?

11 A. \$571,285.80.

12 Q. \$571,000?

13 A. Correct.

14 Q. And so for each of these checks -- and this is true of
15 Olive Management and ASA and Safari -- Feeding Our Future
16 kept 10 percent; is that right?

17 A. Roughly 10 percent. It's not exactly 10 percent, but,
18 yes, that's what the contract says.

19 Q. So roughly for this check for January 2021 and the Olive
20 Management account, Feeding Our Future would have kept
21 \$57,000?

22 A. Roughly, yes.

23 Q. For administering the paperwork for the site that month?

24 A. For being a sponsor, yes.

25 Q. Okay. And that's, again -- on the left side of the

1 screen, Government Exhibit E43 -- keeping folders like that,
2 correct?

3 A. Correct, and verifying.

4 Q. Okay. Page 136 of Government Exhibit W34, another check
5 to Olive Management that you wrote, correct?

6 A. Correct.

7 Q. For February 2021?

8 A. Yes.

9 Q. What's the amount of that check?

10 A. Sorry. My eyes are bad. \$516,083.40.

11 Q. And then on page 138 of Government Exhibit W34, another
12 check in May of 2021; is that right?

13 A. Yes. This would have been, I believe, for March and
14 April.

15 Q. \$1.1 million?

16 A. Correct.

17 Q. To Olive Management?

18 A. Yes.

19 Q. And that, again, is a site -- one of the sites that
20 Salim Said and his partners ran; is that right?

21 A. Yes.

22 Q. And you knew that, correct?

23 A. Yes, I was aware.

24 Q. Okay. Because you said earlier you didn't know that.

25 A. I didn't know necessarily at the time that the site ID

1 request was submitted for all of them what their
2 connections, if any, were.

3 Q. But you knew later, correct?

4 A. Yes, I had learned.

5 Q. And, in fact, you would correspond with Mr. Said about
6 picking up the checks and receiving the checks, right?

7 A. I responded with anyone that had questions or needed
8 info on checks because I was the one that wrote them.

9 Q. I'm asking about Salim Said. You texted with him,
10 right?

11 A. Yes. I sent him photos of checks.

12 Q. Big checks, right?

13 A. Yes, checks that had been reimbursed.

14 Q. I assume he was excited to get those?

15 A. I don't know. I didn't -- I wasn't there when he picked
16 them up.

17 Q. All right. Let's talk about the other sites, because it
18 wasn't just Safari Restaurant, ASA Limited and Olive
19 Management; is that right?

20 A. Correct.

21 Q. If I get the timeline right, Safari started in
22 April 2020, correct?

23 A. Yes.

24 Q. And then Olive and ASA started in September, October,
25 correct?

1 A. Correct.

2 Q. Now, all those were big sites, you would agree?

3 A. Yes.

4 Q. Serving 5,000 kids a day at Safari, later 6,000,
5 correct?

6 A. For a period.

7 Q. And both ASA and Olive were doing 3,000 kids a day,
8 that's the claims -- what the claims said, correct?

9 A. Yes.

10 Q. So these are \$500,000 a month or more each, correct?

11 A. Yes, the reimbursements.

12 Q. And even more for Safari, correct?

13 A. Correct.

14 Q. Now, MDE grew concerned, right?

15 A. I don't know what you mean by "concerned." They asked
16 questions about certain sites and stuff, yes.

17 Q. They were concerned about these for-profit entities
18 participating in the program, correct?

19 A. They sought clarification.

20 Q. In fact, they at some point banned for-profit
21 restaurants from participating in running sites; is that
22 right?

23 A. They asked for justification of why the sites were
24 needed.

25 Q. Because they were concerned?

1 A. They never expressed a concern directly. I had asked
2 multiple times if they had concerns as well as reported what
3 I was finding, and there was never a response.

4 Q. And they definitely were concerned. They didn't want
5 these sites in the program, correct?

6 A. They wanted to make sure the sites were complying with
7 the rules and regulations.

8 Q. Because the site [sic] wasn't designed to fund
9 restaurants to the tune of millions and millions of dollars,
10 correct?

11 A. Well, the program is designed to feed kids, which
12 ultimately funds restaurants, distributors, grocery stores
13 and the like.

14 Q. So let's talk about it. In that time frame, in the fall
15 of 2020, MDE said for-profit restaurants had to shut down,
16 correct?

17 A. Yes, that sounds right.

18 Q. And I know that there was some things with nonprofits,
19 but before we get to those other sites, I want to talk about
20 Salim Said and his group, the Safari Restaurant crew. Okay?

21 A. Safari location specific or -- sorry. I'm just trying
22 to clarify.

23 Q. I want to talk about the broader group. I know they had
24 a lot of sites.

25 A. Okay. Yes.

1 Q. They actually obtained a nonprofit in October of 2020
2 and began opening up even more sites in the name of this
3 nonprofit, correct?

4 A. Stigma-Free opened sites yes.

5 Q. And they had to use Stigma-Free because MDE wasn't
6 accepting new for-profit sites, correct?

7 A. At that time, no.

8 Q. Okay. So they couldn't open up -- they couldn't create
9 another ASA Limited or Olive Management, correct?

10 A. Correct.

11 Q. They couldn't just -- they couldn't go down to the
12 Secretary of State's office, register a new entity, enroll
13 in the program, and claim 3,000 kids a day a few weeks
14 later, correct?

15 A. They could if they were the vendor or a distributor, but
16 as an actual site participant, no.

17 Q. They had to have a nonprofit?

18 A. Nonprofits --

19 Q. And they got a nonprofit; is that right?

20 A. Stigma-Free applied. I don't know -- got? I don't -- I
21 mean, I've seen what you've presented, but at that time
22 Stigma-Free was brought in, it was my understanding that it
23 had existed for a long time.

24 Q. And suddenly it was participating in the program,
25 correct?

1 A. Yes. A lot of sites joined the program.

2 Q. That I agree with.

3 All right. I'm showing you on the left side of
4 the screen Government Exhibit G3. This is the first --
5 there was two Stigma-Free sites that formed right away in
6 October 2020; is that right?

7 A. Yes. There was two at the same time, but, yeah, based
8 on the email, it's October.

9 Q. And the first one was Stigma-Free, Willmar, correct?

10 A. Correct.

11 Q. And that site was opened in Willmar, Minnesota?

12 A. Yes.

13 Q. And looking at Government Exhibit G3, you submitted the
14 site application for Stigma-Free, Willmar?

15 A. Again, site application indicating the start of the
16 process. This was a site ID request.

17 Q. Okay. But you called it site application, correct?

18 A. Because it started the process, yes.

19 Q. Okay. And just directing your attention to page 2 here,
20 that's your handwriting, right?

21 A. It is, and my signature.

22 Q. Stigma-Free, Willmar?

23 A. Yep.

24 Q. Okay. And that same day -- I'm showing you the right
25 side of the screen -- October 19th, 2020, you also submitted

1 a site application to open a Stigma-Free site in Mankato,
2 Minnesota, correct?

3 A. Yeah, I typically set aside a period of time to submit
4 site IDs, and so if they were ready and we had the info, it
5 would be submitted.

6 Q. Two sites for Stigma-Free on the same day, correct?

7 A. Correct.

8 Q. Okay. And, again, on both of them, on page 2 of these
9 two exhibits, you filled them out, correct?

10 A. I completed this checklist, yeah.

11 Q. Page 3 as well?

12 A. Yep, for the summer program, I completed that checklist.

13 Q. Your signature?

14 A. It is.

15 Q. On the left in Willmar and on the right in Mankato?

16 A. Correct.

17 Q. And directing your attention to page 7 of both
18 Government Exhibits G3 and H1, you filled out the program
19 name and the start date for both of these two Stigma-Free
20 sites; is that right?

21 A. Yes, I completed their name and address.

22 Q. In Willmar and Mankato?

23 A. Correct.

24 Q. On start date of October 10th, 2020; is that right?

25 A. That's when the agreement would start, yes.

1 Q. Okay. Now, within a matter of weeks, each of these
2 sites began claiming to serve 3,000 kids a day every day,
3 correct?

4 A. I don't know the numbers off the top, but, yes, if
5 that's what you are saying, I trust you have the meal counts
6 to show that.

7 Q. You don't have to trust me. Let's look at Government
8 Exhibit G40 on the left, which is another folder from
9 Feeding Our Future, correct?

10 A. Correct.

11 Q. That you labeled "FY20, November, Stigma-Free, Willmar";
12 is that right?

13 A. No, that's not my handwriting.

14 Q. That one is not your handwriting. Okay.

15 A. I write in capitals.

16 Q. And on the right, Government Exhibit H43 is a similarly
17 marked folder for Stigma-Free, Mankato, correct?

18 A. Correct.

19 Q. All right. I'm showing you page 3 of Government
20 Exhibit G40 and page 11 of Government Exhibit H43.

21 You will agree with me that both of these sites by
22 November 1st, 2020, claimed to be serving exactly 3,000 kids
23 a day or just a few kids under; is that right?

24 A. Yeah, they were preparing 3,000, but serving slightly
25 under.

1 Q. And that's within three weeks of your applying to get
2 them into the program; is that right?

3 A. Yes.

4 Q. And that continued day after day seven days a week in
5 November 2020; is that right?

6 A. That's what's reported, yes.

7 Q. For both sites?

8 A. Correct.

9 Q. That's, you will agree with me, the same thing that
10 happened with the Olive Management site, correct?

11 A. It was.

12 Q. The same thing that happened with the ASA Limited site?

13 A. Yep.

14 Q. A pattern, correct, you will agree?

15 A. That the sites when they started serving food started
16 serving a large number consistently, yes.

17 Q. Now, Willmar, Minnesota, is a smallish town; is that
18 right?

19 A. Yeah, from what I know. I've never been there, but yes.

20 Q. About 20,000 people?

21 A. I don't know, but, yes, I'll trust you do.

22 Q. You were here at trial and you heard the testimony and
23 saw the records that there are approximately 4,000 kids in
24 the entirety of the Willmar Public School District?

25 A. Many of these sites, these ones included, were doing

1 home deliveries as well as bringing trucks of food to other
2 locations. And so I trusted that when my staff went,
3 reviewed, monitored the sites --

4 Q. I'm sorry, Ms. Bock. I just asked, Are there 4,000 kids
5 in the Willmar Public School District.

6 A. In the school district?

7 Q. Yes.

8 A. That's what was testified.

9 Q. Okay. So this would be 75 percent of all the kids in
10 the Willmar Public School District got food from the
11 Stigma-Free, Willmar site on day one, three weeks after the
12 site applied to enter the program; is that right?

13 A. If you are looking at the numbers, yes, but it wouldn't
14 necessarily be those kids.

15 Q. Okay. It would be other kids from other places?

16 A. Yes.

17 Q. Okay. Is that true of Mankato, too, it wouldn't
18 necessarily be Mankato kids, they would be coming from all
19 around?

20 A. Like I said, some sites would fill trucks and bring them
21 to a different location, where parents could come, kind of a
22 satellite location, but I relied on the staff that was
23 monitoring and reviewing the meal counts and invoices to
24 verify that.

25 Q. And the meal counts that you saw, day one each of these

1 sites, ASA Limited, Olive Management, Stigma-Free, Willmar,
2 Stigma-Free, Mankato, 3,000 kids day one and every day
3 thereafter --

4 A. I did not see --

5 Q. -- correct?

6 A. -- the meal counts, nor did I necessarily keep track of
7 what day the application was submitted and what day the
8 claims started. Yes, from the documentation you've shown,
9 that is what happened. However, like I said, I did not
10 track that data.

11 Q. Well, you did go into CLiCS, though, correct?

12 A. Yes.

13 Q. You had to go into CLiCS to enroll each of these sites
14 into the program?

15 A. To complete an application.

16 Q. And then a month or two later you went in to enter the
17 initial claims, correct?

18 A. Yes.

19 Q. So you went into the CLiCS forms for this newly created
20 site, correct?

21 A. For the different parts, yes.

22 Q. And immediately, the very first time you submitted
23 claims on behalf of Stigma-Free, Willmar, it was to the tune
24 of 3,000 children a day, two meals a day, seven days a week;
25 is that right?

1 A. That was what was submitted. However, like I said, at
2 that time all that's available is boxes that are filled in.
3 So I didn't track whether it was a first claim, a third
4 claim. I trusted that the staff had reviewed.

5 Q. I'm just asking you if that's what you did.

6 A. I entered the numbers that were generated and approved
7 from CenterPilot.

8 Q. And then you did the same for Stigma-Free, Mankato,
9 correct?

10 A. I did the same for all claims. Once the staff reviewed,
11 approved, and then CenterPilot processed, I would submit
12 them.

13 Q. And they came in at the same time, correct?

14 A. I don't know if they came in at the same time or not.

15 Q. And you went into the form and certified that they were
16 accurate, correct?

17 A. I certified that they were in the right category, that
18 we had the documentation, and that I was not deliberately
19 misrepresenting any information.

20 Q. Okay. And then you hit click because you wanted MDE to
21 pay out the money based on these claims, correct?

22 A. Claims that were approved, yes. They're, by law,
23 entitled to a reimbursement, and the way to facilitate that
24 is through MDE.

25 Q. All right. And I want to show you these meal counts,

1 because I know you've had a little bit of uncertainty about
2 whether you saw these meal counts for these new sites. And
3 I want to show you a couple things that are not yet in
4 evidence.

5 First, Ms. Bock, I'm going to show you what's been
6 marked, but not yet admitted, as Government Exhibit R15.
7 Okay?

8 A. Okay.

9 Q. And is this an email that you -- that was sent from
10 Abdikadir Mohamud to Mr. Eidleh and yourself,
11 aimee@feedingourfuture?

12 A. I was included, yes.

13 Q. Okay. And on the right side of the screen I'm going to
14 show you what's been marked, but not yet admitted, as
15 Government Exhibit R18, which is another email sent that
16 same day, December 30th, 2020, from Abdikadir Mohamud to
17 Mr. Eidleh and yourself; is that right?

18 A. Yes.

19 MR. THOMPSON: Your Honor, I move to admit
20 Government Exhibits R15 and R18.

21 THE COURT: Any objection?

22 MR. UDOIBOK: No objection.

23 MR. MONTEZ: No objection.

24 THE COURT: R15 and R18 are conditionally
25 admitted.

1 MR. THOMPSON: Thank you, Your Honor.

2 BY MR. THOMPSON:

3 Q. Ms. Bock, I guess we'll start on the left side, the
4 Willmar site.

5 This is an email that was sent to you on
6 December 30th, 2020; is that right?

7 A. Yes, I was one of the recipients.

8 Q. From Abdikadir Mohamud?

9 A. Yes.

10 Q. Do you know who Abdikadir Mohamud is?

11 A. I don't.

12 Q. He ran the Stigma-Free, Willmar site; is that right?

13 A. Honestly, I don't know him, but, yes, I trust that
14 that's the site he ran. I know he is affiliated with
15 Stigma-Free.

16 Q. Okay. You paid him millions of dollars?

17 A. I paid Stigma-Free.

18 Q. Okay. And he -- the subject line of this email is
19 "Stigma-Free, Willmar October/November"; is that right?

20 A. It is.

21 Q. And attached to it are meal counts, correct?

22 A. Correct.

23 Q. Okay. Before I get to those, on the right side there's
24 another email that Mr. Mohamud sent to you that same day,
25 December 30th, 2020; is that right?

1 A. It is.

2 Q. Sent to you and Mr. Eidleh?

3 A. Correct.

4 Q. The subject line on this one is "Stigma-Free, Mankato,
5 October/November," correct?

6 A. It is.

7 Q. And there's also meal counts attached?

8 A. There's images. I don't know what they -- yes, meal
9 counts.

10 Q. Okay. Just looking at the timing, it looks like he sent
11 you the first email at 11:54 p.m. on December 30th, 2020,
12 correct?

13 A. Correct.

14 Q. That's the Willmar counts, right?

15 A. Yes, for that one.

16 Q. And then he sent you the Mankato counts about one minute
17 later?

18 A. Yep.

19 Q. At 11:55 p.m. on December 30th, 2020; is that right?

20 A. Yes.

21 Q. And again sent to you and Mr. Eidleh?

22 A. I was included, yes.

23 Q. And if we look, starting at page 2 of both exhibits, we
24 see the meal counts for Stigma-Free, Willmar on the left; is
25 that right?

1 A. Yes.

2 Q. Starting on October 19th, 2020; is that right?

3 A. It is.

4 Q. So nine days after you submitted an application to
5 enroll it in the program?

6 A. Yeah.

7 Q. And, similarly, on the right, page 2, we see the claim
8 starting on October 19th for the Stigma-Free, Mankato site;
9 is that right?

10 A. It is.

11 Q. Again, starting at 2,700 day one and then up to 3,000
12 within the first week; is that right?

13 A. That was what was prepared, and, yeah, they served close
14 to that.

15 Q. Well, you don't know that. You weren't there. Or were
16 you there?

17 A. What the form says. No, I've never been to those sites.

18 Q. All right. And page 3 continues, correct, on each one?

19 A. It does.

20 Q. So you received these meal counts, correct?

21 A. I received the email.

22 Q. Okay. And these form the basis for the submissions that
23 you made to CLiCS, correct?

24 A. The meal counts would have been part of it, yes.

25 Q. Okay. And by "part of it," that's where you get the

1 numbers that you actually put into CLiCS, correct?

2 A. No. I get the numbers I put into CLiCS from
3 CenterPilot.

4 Q. That come from these meal counts, correct?

5 A. They come from, yes, the data submitted by the staff.

6 Q. That you received in the mail -- email?

7 A. Yes, as I said, I was copied on claims. And if it
8 hadn't been forwarded to claims, I would forward it on. If
9 it was, then I would just disregard it.

10 Q. And they were kept in the folders that you labeled,
11 correct?

12 A. I pre-labeled the folders each month to track which
13 sites were claiming and when we received documentation.

14 Q. All right. Now I'm going to turn your attention to
15 Government Exhibit W11, which is the Stigma-Free
16 International bank account, and I want to look at -- after
17 you submitted those claims, you received reimbursement funds
18 based on the counts, correct?

19 A. Based on what was submitted, yes.

20 Q. Yeah. Based on what you submitted to CLiCS?

21 A. Based on what MDE approved.

22 Q. And then you wrote checks to Stigma-Free International,
23 correct?

24 A. Yes.

25 Q. What I'm showing you up on the screen at page 36 of

1 Government Exhibit W11 is a check you wrote to Stigma-Free
2 International on January 14th of 2021; is that right?

3 A. It is.

4 Q. What's the amount of the check that you wrote to
5 Stigma-Free International on January 14th, 2021?

6 A. \$425,209.92.

7 Q. You actually -- page down to page 38. You wrote them
8 two checks to Stigma-Free International on that day,
9 January 14th, 2021; is that right?

10 A. Yes. There was two locations, so each location would be
11 reimbursed.

12 Q. And how much did each location receive from you?

13 A. They are both approximately 425.

14 Q. \$425,000?

15 A. Correct.

16 Q. Of which -- well, Feeding Our Future kept another 42,000
17 for its administrative fee?

18 A. Yes, roughly 10 percent.

19 Q. Okay. For keeping those meal counts and forms in that
20 folder?

21 A. No. Sponsors do more. It's also -- all of the Feeding
22 Our Future money is reviewed and approved by MDE, and money
23 not spent is returned to MDE at the end of the year.

24 Q. Directing your attention to page 40, a day later, on
25 January 15th of 2021, you wrote a third check to Stigma-Free

1 International; is that right?

2 A. Yes.

3 Q. What was the amount of this check?

4 A. \$354,874.40.

5 Q. It looks like in that two-day period in January you
6 wrote checks for about \$1.1 million to Stigma-Free
7 International?

8 A. Yes, for multiple months of claims.

9 Q. Okay. And Feeding Our Future would have gotten an
10 additional \$100,000 for its administration of Stigma-Free
11 International's participation in the program?

12 A. Correct.

13 Q. And a week later on January 22nd, here at page 42 of
14 Government Exhibit W11, you cut a fourth check to
15 Stigma-Free International, correct?

16 A. Based on the reimbursement, yes.

17 Q. What was the amount of the check that you -- that you
18 sent or wrote to Stigma-Free International on January 22nd
19 of 2021?

20 A. \$354,456.24.

21 Q. You continued throughout the spring of 2021 to write big
22 checks to Stigma-Free International; is that right?

23 A. Yes, checks were paid based on the approval of their
24 claims.

25 Q. So, for example, here at Government Exhibit W12 at

1 page 134, which is another Stigma-Free account, you wrote a
2 check to Stigma-Free International on February 12th of 2021?

3 A. Correct.

4 Q. For \$571,000?

5 A. That's correct.

6 Q. So that would be \$57,000 to Feeding Our Future on top of
7 that?

8 A. It would hit the Feeding Our Future account, yes.

9 Q. And then on page 40 -- or page 136, another \$516,000
10 check you wrote to Stigma-Free International on March 8th of
11 2021?

12 A. Yes. Checks were written to all of the sites that
13 submitted claims that were approved by the staff and then
14 again approved by Feeding Our Future.

15 Q. And written by you, correct?

16 A. Yes, I wrote the checks.

17 Q. Page 138, there's another big check to Stigma-Free
18 International that same day, March 8th, 2021; is that right?

19 A. Yep, two locations.

20 Q. \$515,000?

21 A. Yes.

22 Q. And at page 140, on May 19th you wrote another check to
23 Stigma-Free International; is that right?

24 A. Correct.

25 Q. For \$1.1 million?

1 A. Yes. That would have been multiple months.

2 Q. Now, Stigma-Free International didn't just stop with
3 those two sites; is that right?

4 A. No. They added additional.

5 Q. And when you say "they," you mean Salim Said and his
6 partners?

7 A. I mean Stigma-Free.

8 Q. Stigma-Free as -- it's just an entity. It can't act,
9 correct?

10 A. Yeah, it's a nonprofit.

11 Q. People act on its behalf?

12 A. Yeah, I suppose.

13 Q. Including Salim Said?

14 A. I don't know what his role, if any, was with
15 Stigma-Free. I know he was aware of it. I know he -- I
16 sent him check images, but I don't know if there was -- I
17 don't know if there was any, like, formal sort of
18 connection.

19 Q. Well, I'm going to put back up on the screen that check
20 that we just looked at at W12, 140, that you wrote to
21 Stigma-Free International on May 19th, 2021. Okay?

22 A. Yeah.

23 Q. \$1.1 million?

24 A. Correct.

25 Q. On that same day you sent a text message to Salim Said;

1 is that right?

2 A. Yeah, I just said that I sent him some images, but I
3 don't know if there was any, like, other relationship than
4 he knew them and would tell them their checks were ready or
5 what purpose.

6 Q. You didn't know whether there was any other relationship
7 besides the \$1.1 million check that you gave him?

8 A. I didn't give it to him. I don't know that he's the one
9 that picked it up. I know that I sent him an image of the
10 check.

11 Q. Okay. Well, let's look at that. And that's been
12 admitted as Government Exhibit BB30a; is that right?

13 A. Correct.

14 Q. And this is text messages between you and Mr. Salim
15 Said; is that right?

16 A. Yes. Like I said, I did send him an image of the check.

17 Q. Who you had in your phone as Safari?

18 A. Yes.

19 Q. And you sent him the image of the check -- two checks,
20 correct?

21 A. I did.

22 Q. Both to Stigma-Free International?

23 A. Correct.

24 Q. Both dated May 19th, 2021?

25 A. Yes.

1 Q. One for \$1,124,000 and change, correct?

2 A. Yes. It was for multiple months.

3 Q. Okay.

4 A. Both of them were.

5 Q. And then the other check that same date, \$1,123,000 and
6 change, correct?

7 A. Correct.

8 Q. And you sent those to Salim Said?

9 A. I sent images of them. Like I said, I knew they were
10 affiliated with each other. I was not aware of any formal
11 connections or relationships.

12 Q. You just sent him checks -- pictures of checks for that
13 entity?

14 A. Like I said, I knew he was associated with them. I
15 didn't know if there was a more formal, like, business
16 relationship or anything of that sort.

17 Q. And you also sent him an image of a third check that
18 day; is that right?

19 A. Correct.

20 Q. May 19, 2021, for \$1.5 million; is that right?

21 A. Yes. That would again be for multiple months.

22 Q. For a site called Brava Restaurant?

23 A. That's correct.

24 Q. Another site that Salim Said and his partners had opened
25 under the sponsorship of Feeding Our Future?

1 A. It was another site affiliated with that group, but like
2 I said, I don't know what their formal connections were.

3 Q. You just figured you'd send him a picture of the check?

4 A. I knew they were affiliated, and I knew that --

5 (Pause)

6 Q. I thought you were going to finish.

7 I mean, you knew that they had a relationship?

8 A. Yeah, I knew they had a relationship. I knew that he
9 was kind of -- would help share information. I don't know
10 what formal --

11 Q. He was your contact person for all these sites; is that
12 right?

13 A. He was not. I didn't contact sites generally very
14 often.

15 Q. But you did contact Salim Said?

16 A. I sent an image of a check, which would have been a
17 response to a request. I didn't just send check images to
18 people.

19 Q. I'm going to show you Government Exhibit BB30c, another
20 text exchange between -- text message exchange between you
21 and Salim Said; is that right?

22 A. That's right.

23 Q. And here you are writing him on June 18th, 2021; is that
24 right?

25 A. Yes.

1 Q. And you are updating him about three different sites,
2 correct?

3 A. Correct. Like I said, I knew that they were affiliated.
4 I did not know if there were formal business relationships
5 or anything financial.

6 Q. You knew -- well, you just thought you'd email him that
7 these had been approved, these sites had been approved to
8 restart in June of 2021; is that right?

9 A. This was a response. People had been, including these
10 locations, contacting Feeding Our Future regularly asking if
11 applications had been approved. I was notifying him that
12 these three locations are approved.

13 Q. Because you knew he was affiliated with them, correct?

14 A. Yes. I've said I knew they were affiliated. I didn't
15 know formal relationships or financial.

16 Q. Ms. Bock, just answer my question, please. Okay?

17 Brava Restaurant. Affiliated with Salim Said?

18 A. Yes.

19 Q. Okay. On June 18th, 2021, you texted him an update as
20 to the status of their application to participate in the
21 summer program, correct?

22 A. Yes. Like I said, I sent that text notifying him.

23 Q. And you said 2,000 each, right?

24 A. That was the limit that their application was approved
25 for.

1 Q. So they could charge for up to 2,000 kids a day,
2 correct?

3 A. Correct.

4 Q. Which they did, correct?

5 A. Yes.

6 Q. Every day?

7 A. Close to.

8 Q. Seven days a week?

9 A. Correct.

10 Q. Week after week?

11 A. Correct.

12 Q. Month after month?

13 A. Yep.

14 Q. Billing the maximum, correct?

15 A. Close to it, yes.

16 Q. ASA Limited. Another site affiliated with Salim Said?

17 A. Yes.

18 Q. And on June 18th you texted him an update about the
19 approval of that site to participate in the summer program,
20 correct?

21 A. Yes. Like I said, I notified a lot of people when sites
22 were approved.

23 Q. We're talking about this one.

24 A. Yes, I sent it.

25 Q. And you updated him because you knew he was affiliated

1 with it?

2 A. I knew that there was affiliation, yes.

3 Q. You told him they were approved to participate and bill
4 up to 2,000 kids a day, correct?

5 A. Yes. We always told people the limit.

6 Q. Which they did, correct?

7 A. Correct.

8 Q. Every day?

9 A. Yep.

10 Q. Day after day?

11 A. Correct.

12 Q. Week after week?

13 A. Yep.

14 Q. Seven days a week?

15 A. Yep.

16 Q. Just like Brava Restaurant?

17 A. Correct. Yes.

18 Q. Is that a yes?

19 A. "Yes," I said.

20 Q. Olive Management. Same thing, correct?

21 A. Correct.

22 Q. Again, Salim Said related site?

23 A. There was an affiliation, yes.

24 Q. You -- enough of an affiliation that you felt that you
25 needed to give him an update about the status of its

1 approval, correct?

2 A. Yes. I was instructed to tell him when they were
3 approved.

4 Q. And you did?

5 A. Yes.

6 Q. And you told him it was approved up to -- to bill up to
7 2,000 kids a day, correct?

8 A. Yes. We told everyone what the limit was.

9 Q. Which they did?

10 A. Correct.

11 Q. They billed right at the limit, correct?

12 A. Yes. A decrease of -- from 3,000.

13 Q. Every day?

14 A. Yes.

15 Q. Seven days a week?

16 A. Yes. That happened frequently with home deliveries.

17 Q. Okay. And you submitted all their claims into CLiCS,
18 correct?

19 A. All of the claims were reviewed for accuracy, receipts
20 and invoices were verified, the report was generated and,
21 yes, I transferred it into CLiCS.

22 Q. Okay. And then you -- when there was checks ready,
23 you'd tell Mr. Salim -- or Mr. Said, correct?

24 A. On some occasions, if he had asked, or someone had asked
25 me to send it to him.

1 Q. And he would actually ask for updates, correct?

2 A. I would what?

3 Q. He would ask for updates?

4 A. Sometimes.

5 Q. He wanted the checks?

6 A. Yes, people wanted to know when they were being
7 reimbursed.

8 Q. Mr. Salim wanted?

9 A. A lot of people wanted. Yes, he was probably one of
10 them.

11 Q. Okay. Well, he definitely was one of them, correct?

12 Showing you what's been admitted as Government
13 Exhibit BB30d, is this a text message from Salim Said to you
14 on November 2nd, 2021?

15 A. Yes, it is.

16 Q. And he's asking for some updates, correct?

17 A. Correct.

18 Q. "Aimee, any checks for ASA summer?" That's ASA Limited?

19 A. Correct.

20 Q. "Olive Management after school." That's the Olive
21 Management site?

22 A. Correct.

23 Q. Stigma-Free --

24 A. Yeah.

25 Q. -- they had a bunch of sites, right?

1 A. They had a few.

2 Q. And Brava?

3 A. Correct.

4 Q. Down in Rochester?

5 A. Yes.

6 Q. So he wanted the checks for each and every one of those
7 sites; is that right?

8 A. I don't know if he wanted them or if he was -- he wanted
9 to know if they were available. I don't know if it was him
10 or if it was other people that wanted it.

11 Q. He was the one asking, though?

12 A. Yeah, he asked, absolutely.

13 Q. It wasn't someone else that -- someone else wasn't --
14 you are not saying someone else sent those texts?

15 A. No, but I'm saying they maybe had asked him and he
16 contacted me for the information.

17 Q. And that makes sense.

18 All right. Let's talk about more Stigma-Free
19 sites.

20 Waite Park, Minnesota; is that right?

21 A. Yes.

22 Q. Government Exhibit I1 is the application -- site
23 application that you submitted for Waite Park, correct?

24 A. Yes, I submitted the site ID request.

25 Q. On December 30th, 2020?

1 A. Correct.

2 Q. Okay. And December 30th, 2020, that site started doing
3 good business pretty much right away, right?

4 (Pause)

5 Q. You don't have to look.

6 A. Huh?

7 Q. It started billing right up to the maximum right away,
8 didn't it?

9 A. I don't know. I don't recall when they started billing
10 in relation to when the site ID request was submitted.

11 Q. Well, here, this is Government Exhibit I22 at page 11.
12 Meal counts submitted in April 2021 for the Stigma-Free,
13 Waite Park site; is that right?

14 A. Yeah, that was -- they started a while after the request
15 was submitted.

16 Q. That's your email address, aimee@feedingourfuturemn.org?

17 A. Yeah, that appears to be an outdated form that was still
18 in circulation. The new ones had been reflected with the
19 claims address.

20 Q. Okay. But it's your email address, right?

21 A. Yes, on the form.

22 Q. Site supervisor Hamdi Omar?

23 A. Yes.

24 Q. And exactly 2,000 kids a day every single day; is that
25 right?

1 A. Yes. So that happened again frequently when they
2 deliver or pass out or deliver the seven-day bundles of
3 meals. They would get the food for seven days therefore.

4 Q. This one has a roster, right?

5 A. It does.

6 Q. Remarkable. Would you agree?

7 A. Being that it wasn't required and not used, it is just a
8 list of names with Xs, to be honest. If it was actual
9 attendance that was required and they were tracking
10 attendance, yes, it would be remarkable.

11 Q. But it was just made up for fun?

12 A. No.

13 Q. We'll come back to that. Let's talk about Brava. We
14 just saw \$1.5 million check that you took a photo of and
15 sent to Salim Said; is that right?

16 A. Yep.

17 Q. That's another site that Salim Said and his crew had
18 opened; is that right?

19 A. Which site? I'm sorry. I --

20 Q. Brava Restaurant.

21 A. Yes.

22 Q. Down in Rochester, Minnesota?

23 A. Yes.

24 Q. And here I'm showing you Government Exhibit L2, which is
25 the site application that you submitted for the Brava

1 Restaurant; is that right?

2 A. Yes, this was the site ID request.

3 Q. You submitted it?

4 A. I did.

5 Q. And what's the date on which you submitted it?

6 A. September 8th of 2020.

7 Q. And that, if I remember correctly -- let me just -- that
8 is about the same date that you submitted the claims for ASA
9 Limited and Olive Management; is that right?

10 A. I don't -- the site ID request, yes. I don't know when
11 claims were submitted.

12 Q. Okay. On the same day as ASA Limited; is that right?

13 A. Yes. Like I said, I would often set aside time and then
14 I would work on that, because it was more efficient than one
15 here, one there.

16 Q. Okay. All right. So, Ms. Bock, I want to ask you a
17 little bit more about the affiliation between these sites;
18 is that right? Okay?

19 A. Okay.

20 Q. Okay. So we had had some conversation about Mr. Said's
21 affiliation with these different sites; is that right?

22 A. Yes.

23 Q. And Safari Restaurant, correct?

24 A. Correct.

25 Q. I'm showing you now what's been admitted as Government

1 Exhibit B25, which is an email on August 3rd, 2021, that is
2 sent to claims@feedingourfuture and you, correct?

3 A. I'm copied, yes.

4 Q. The subject is "Invoices," correct?

5 A. Correct.

6 Q. And the attachment is invoices for the Safari sites,
7 correct?

8 A. Correct.

9 Q. And starting at page 2, what we see here is that Safari
10 not only was claiming to serve thousands of kids a day at
11 its own site, but it was vending for other sites; is that
12 right?

13 A. Yes, there was a summer catering contract.

14 Q. So here this invoice, which is dated July 31st of 2021,
15 Safari Restaurant was billing Feeding Our Future, correct?

16 A. Yes, for summer -- it would be a bill to Feeding Our
17 Future.

18 Q. And that was for providing meals served at the
19 Stigma-Free, Mankato site?

20 A. Yes.

21 Q. Exactly 2,000 breakfasts and 2,000 lunches a day?

22 A. Well, they would bill based on what was prepared.

23 Payments would only be based on what was --

24 Q. But that's what the invoice says, correct?

25 A. Yes, that's what they --

1 Q. Exactly 2,000 a day?

2 A. Yes.

3 Q. For Stigma-Free, Mankato?

4 A. Correct.

5 Q. And so for that Stigma-Free, Mankato site, Safari
6 Restaurant claimed to be entitled to \$440,000 for July of
7 2021, correct?

8 A. Yes, that's what the invoice is for.

9 Q. And then on page 4 there's a second invoice in this
10 attachment, correct?

11 A. Yes.

12 Q. Safari Restaurant is billing Feeding Our Future?

13 A. Yes.

14 Q. For meals, breakfasts and lunches, purportedly for the
15 Stigma-Free, Willmar site, correct?

16 A. Correct.

17 Q. Same month, July 2021?

18 A. Yes.

19 Q. 2,000 breakfasts and 2,000 lunches a day?

20 A. Correct.

21 Q. And at page 5, the total amount that Safari bills
22 Feeding Our Future for July 2021 and the Willmar site?

23 A. Can you call it out? I'm so sorry. My eyes are really
24 bad. 440,820.

25 Q. Same as the Mankato site for July 2021, correct?

1 A. Yes, they are both for 2,000 meals.

2 Q. A day?

3 A. Correct.

4 Q. Actually 2,000 of two meals, correct?

5 A. Correct.

6 Q. So 4,000 meals a day?

7 A. Yes.

8 Q. In both Mankato and Willmar?

9 A. That's what the invoices are for.

10 Q. Okay. And then page 6 they also claim to be delivering
11 4,000 meals a day to be served at Brava Restaurant in
12 Rochester, correct?

13 A. Correct. 2,000 of breakfast and lunch, yes.

14 Q. Okay. Billing Feeding Our Future for that?

15 A. Correct.

16 Q. And at page 7, this invoice that Safari Restaurant
17 submitted for July 2021 claimed to be entitled to another
18 \$440,000 for the 4,000 meals a day purportedly for kids at
19 the Brava Restaurant site, correct?

20 A. Correct.

21 Q. So we're up to 4,000 -- 12,000 meals a day in July 2021,
22 correct, from Safari Restaurant?

23 A. Yes, six of each.

24 Q. That's not it, though. Page 8, there's also an invoice
25 from Safari Restaurant for meals purportedly served at the

1 Olive Management site in St. Cloud, correct?

2 A. Correct.

3 Q. That same month, July 2021?

4 A. Yes.

5 Q. 2,000 breakfasts and 2,000 lunches every single day?

6 A. Correct.

7 Q. So that's another 4,000 meals a day?

8 A. Yes, if you combine them.

9 Q. Now we're up to 16,000 meals a day?

10 A. Yep, 8,000 breakfast, 8,000 lunch.

11 Q. Another \$440,000 for that one?

12 A. Yeah.

13 Q. And then there's another one here, page 10 of Government
14 Exhibit B25, an invoice from Safari Restaurant for meals
15 purportedly served at the ASA Limited site, correct?

16 A. Correct.

17 Q. In July of 2021, correct?

18 A. Yes.

19 Q. And that's another 4,000 a day?

20 A. Yep, 2,000 of each.

21 Q. Seven days a week?

22 A. Correct.

23 Q. All 31 days of the month?

24 A. Yes.

25 Q. Another \$440,000 in Federal Child Nutrition Program

1 funds?

2 A. Correct.

3 Q. So that's five -- that's 20,000 meals a day purportedly
4 provided by Safari Restaurant, correct?

5 A. Yes, 10,000 breakfast and 10,000 lunch.

6 Q. In Mankato, Willmar, Waite Park, Rochester and St. Paul,
7 correct?

8 A. Yes.

9 Q. So you talked about not knowing whether there was a
10 relationship between Salim Said and these different sites.
11 There was, correct?

12 A. There was a catering contract, yes. I was aware that
13 they catered. I did not know if there was a formal business
14 arrangement between these organizations or a formal
15 connection. I am aware that Safari was the vendor.

16 Q. Okay. So they were billing over 400 grand a month per
17 site to Feeding Our Future, correct?

18 A. That's what the invoices are for, yes.

19 Q. Salim Said's company, Safari Restaurant?

20 A. Correct.

21 Q. Purportedly serving 4,000 meals a day at each of these
22 sites around the state, correct?

23 A. Yes, 2,000 breakfast, 2,000 lunch.

24 Q. Yeah. And then you were reaching out -- Mr. Salim Said
25 was reaching out to you to ask when checks were ready,

1 correct?

2 A. Correct.

3 Q. And you would send him images of the checks, million
4 dollar plus checks, correct?

5 A. When they were requested.

6 Q. For these various sites?

7 A. For some of the sites. I don't know if it was for all.

8 Q. So safe to say it wasn't a secret that Salim Said had an
9 interest in these sites; is that right?

10 A. No. I knew there was an affiliation. I just didn't
11 know any formal business connection.

12 Q. Okay.

13 MR. THOMPSON: Your Honor, this is probably a good
14 time to stop.

15 THE COURT: All right. We'll take our lunch break
16 at this time. Let's return at 1:30.

17 All rise for the jury.

18 12:20 p.m.

19 **IN OPEN COURT**

20 **(JURY NOT PRESENT)**

21 THE COURT: Court stands in recess until 1:30.

22 (Lunch recess taken at 12:20 p.m. till 1:38 p.m.)

23 1:38 p.m.

24 **IN OPEN COURT**

25 **(JURY PRESENT)**

1 THE COURT: You may all be seated.

2 And Mr. Thompson, you may continue.

3 MR. THOMPSON: Thank you, Your Honor.

4 BY MR. THOMPSON:

5 Q. Ms. Bock, when we left off before the lunch break, we
6 were talking about Government Exhibit B25; is that right?

7 A. Yes.

8 Q. And it was an email sent to you by Farhiyo Moalim. Do
9 you remember hearing her testify earlier in the trial?

10 A. I do.

11 Q. She worked at that building, 2722 Park Avenue?

12 A. Yeah, that's what she said.

13 Q. And where Salim and the other owners of Safari
14 Restaurant would have meetings about the food program?

15 A. That's what she testified.

16 Q. Okay. And she scanned this stack of invoices for Safari
17 to you, correct?

18 A. To claims. I was copied on it.

19 Q. Okay. Sent to your email though?

20 A. Yes.

21 Q. Okay. And I think we just went through it, I won't do
22 it again, but it had invoices purporting to show that Safari
23 Restaurant provided 2,000 -- or actually 4,000 meals a day
24 at these various sites, correct?

25 A. Correct.

1 Q. At five sites located around the state of Minnesota?

2 A. Correct.

3 Q. In Mankato, correct?

4 A. Yes.

5 Q. Willmar?

6 A. Yes.

7 Q. I'm showing you on the screen.

8 A. Oh, thank you. I'm trying to remember.

9 Q. Brava Restaurant, which is in Rochester?

10 A. Correct.

11 Q. Olive Management in St. Cloud?

12 A. Yes.

13 Q. And ASA Limited, which is in St. Paul, correct?

14 A. Correct.

15 Q. And for each of those sites Safari Restaurant, Salim
16 Said's company, was billing or claiming to be entitled to
17 \$440,000 in Federal Child Nutrition Program funds for the
18 month of July?

19 A. That's what the invoice says.

20 Q. Just a little over \$2 million total, correct, for that
21 month?

22 A. Yes. I'm sorry. I'm not good at math. Yes.

23 Q. 400,000 times five?

24 A. Times five, yes.

25 Q. 20,000 meals a day?

1 A. 10,000 breakfast, 10,000 lunch, correct.

2 Q. Okay. And you received these invoices; is that right?

3 A. I was a recipient.

4 Q. Okay. And you submitted these claims to MDE?

5 A. I don't know. These aren't claims, so I don't know what
6 the totals were that were submitted.

7 Q. But you ended up paying out this money to Safari
8 Restaurant; is that right?

9 A. There was payments made. I don't know that it was for
10 that total.

11 Q. Okay. We'll come back to that in a little bit. Before
12 I do, I want to -- you know what? Let's talk a little bit
13 more about meal counts. Okay?

14 A. Okay.

15 Q. You testified that generally meal counts would be
16 emailed in, correct?

17 A. Generally.

18 Q. Also they would be dropped off?

19 A. Occasionally, less often, but yes.

20 Q. At Feeding Our Future?

21 A. Correct.

22 Q. So a site owner, say, would come in and drop off the
23 stack of meal counts?

24 A. It could be a site owner, a staff member. Somebody
25 would drop them off.

1 Q. And then at Feeding Our Future, someone at Feeding Our
2 Future would take them and scan them, correct?

3 A. Correct.

4 Q. For submission to the system?

5 A. Yes.

6 Q. You would do that sometimes, correct?

7 A. [Inaudible.]

8 Q. The meal counts?

9 THE COURT REPORTER: What did you say?

10 THE WITNESS: I said I would scan stuff, yes.

11 BY MR. THOMPSON:

12 Q. Sometimes --

13 A. I'm sorry?

14 Q. Sometimes people would bring you meal counts, correct?

15 A. No. I would be -- I would get them from the front desk.

16 Q. And then you would scan them in?

17 A. Correct.

18 Q. I want to show you now Government Exhibit B14, which is
19 in evidence. There's meal counts attached to it, but this
20 is an email -- if I get this correctly, this is a fax or a
21 scan that you sent to yourself; is that right?

22 A. Correct.

23 Q. So for those who don't work in an office, if you use a
24 photocopy machine to scan documents, you can email them to
25 yourself, correct?

1 A. Yeah, they can be emailed to people.

2 Q. And is that what you did here?

3 A. I don't know if I scanned it. I did receive it. It may
4 have been an employee sending it to me.

5 Q. Someone else might have sent it to you?

6 A. They could have. I don't know.

7 Q. They wanted you to look at them?

8 A. Hard to say. It was a long time ago.

9 Q. And this one specifically is February 2nd, 2021; is that
10 right?

11 A. That's correct.

12 Q. And these meal counts here are for Safari Restaurant; is
13 that right?

14 A. That's correct.

15 Q. That were scanned and sent to you?

16 A. Correct.

17 Q. For the month of January 2021?

18 A. Yes.

19 Q. All right. And if I page through here, it's 6,000
20 breakfasts and 6,000 lunch a day; is that right?

21 A. Yes.

22 Q. So 12,000 meals a day?

23 A. Yes.

24 Q. Seven days a week?

25 A. Yes.

1 Q. And they're signed by multiple people; is that right?

2 A. That one is somebody -- "AS." I don't know who.

3 Q. Okay. And then at page 7, the last day is signed by
4 Salim Said; is that right?

5 A. Yes.

6 Q. So when these were scanned in, they were put in those
7 folders; is that right?

8 A. In the claims folders?

9 Q. Yeah.

10 A. Yeah, they should be in there.

11 Q. Okay. And these are the folders that were compiling the
12 documentation supporting the claims you submitted via CLiCS,
13 correct?

14 A. They're the claims folders, yes.

15 Q. And these ones that were scanned and sent to your email
16 were put in a folder; is that right?

17 A. I would assume so.

18 Q. I'm showing you on the right-hand side of the screen
19 Government Exhibit B68, which is in evidence, which is a
20 folder labeled "FY January, Safari, SFSP"?

21 A. That's what it says.

22 Q. Your handwriting on there?

23 A. Nope.

24 Q. Okay. And if I look here, it looks like the claims that
25 were scanned and sent to your email ended up in this folder;

1 is that right?

2 A. It is.

3 Q. Same one?

4 A. Yes.

5 Q. Okay. And that was typical? When things were scanned,
6 that's how it would work?

7 A. Not typically.

8 Q. Just sometimes?

9 A. Yep. Claims was AAA and so it was always the top one so
10 that those documents could be scanned direct to them.

11 Q. But those meal counts, 6,000 a day from Safari
12 Restaurant, were scanned and sent to you, correct?

13 A. Yes. I would need to see if they were forwarded to
14 claims, because that would occasionally happen.

15 Q. All right. Safari Restaurant was a large site, you
16 would agree?

17 A. Yes.

18 Q. You paid Safari Restaurant something on the order of
19 \$12 million from Feeding Our Future, correct?

20 A. Correct.

21 Q. And those other sites that were run that were opened by
22 Salim Said and his partners, they also received a lot of
23 money from you and your entity, correct?

24 A. They were reimbursed a lot of money, yes.

25 Q. Millions of dollars?

1 A. Yes.

2 Q. I'm going to show you on the screen here, this is
3 Government Exhibit X2.

4 It looks like you paid \$12 million in Federal
5 Child Nutrition Program funds to Safari Restaurant; is that
6 right?

7 A. I wouldn't say I paid. They were reimbursed.

8 Q. You wrote the checks?

9 A. I wrote the checks after the claims were reviewed,
10 verified, and submitted.

11 Q. Submitted by you?

12 A. The numbers were submitted by me based on what was
13 approved --

14 Q. Okay.

15 A. -- through the process.

16 Q. And then Brava Restaurant here, the one down in
17 Rochester that you and Mr. Said had been texting about,
18 correct?

19 A. Yes, I had notified him that it was approved.

20 Q. Okay. And you sent him a picture of a check to that
21 site, correct?

22 A. Yes.

23 Q. For \$1.5 million?

24 A. That sounds right, yeah.

25 Q. Okay. Over the course of a year and a half period,

1 little less, you sent more than \$5.6 million to Brava
2 Restaurant; is that right?

3 A. That's what they were reimbursed.

4 Q. ASA Limited, the other site created by Defendant Said,
5 \$5.3 million you sent to that site; is that right?

6 A. Yes.

7 Q. \$5.3 million that you sent from Feeding Our Future to
8 Stigma-Free International for the Willmar site; is that
9 right?

10 A. That's what they were reimbursed.

11 Q. \$5.2 million for the Olive Management site in St. Cloud;
12 is that right?

13 A. That was the reimbursement.

14 Q. You sent the money to Olive Management, correct?

15 A. Yes, I was the signer on the check.

16 Q. You approved the claims?

17 A. I did not.

18 Q. You submitted them in CLiCS?

19 A. I entered the data and -- yes.

20 Q. Certified that it was accurate and supported?

21 A. Certified that they were being claimed in the right
22 category and that I had the documentation available and was
23 not deliberately entering false information, yes, I
24 certified that.

25 Q. And then \$5.2 million for Stigma-Free, Mankato; is that

1 right?

2 A. That's correct.

3 Q. There's other sites here that the defendant got money
4 from, Stigma-Free, Waite Park and St. Cloud.

5 You sent, it looks like, \$1.4 million to
6 Stigma-Free International for claims submitted for the
7 Stigma-Free, Waite Park site; is that right?

8 A. That was the reimbursements.

9 Q. And \$1.3 million that you sent and approved for the
10 Stigma-Free, St. Cloud site, correct?

11 A. That's what they were reimbursed, yes.

12 Q. Okay. All right. So that's some of the Safari sites,
13 correct --

14 A. Correct.

15 Q. -- for lack of a better term?

16 A. For lack of a better term.

17 Q. There was far more sites than that under Feeding Our
18 Future, correct, sponsored by Feeding Our Future?

19 A. Correct.

20 Q. And we talked a little bit before the break about the
21 fall of 2020. Do you recall that?

22 A. Yes.

23 Q. And specifically, MDE had some concerns about these
24 for-profit sites that had popped up, correct?

25 A. If that's how you characterize it, yes.

1 Q. It is how I characterize it.

2 They had concerns about Safari Restaurant,
3 correct?

4 A. Not specifically.

5 Q. ASA Limited?

6 A. Not specifically.

7 Q. Olive Management?

8 A. Not specifically.

9 Q. And they were concerned that these for-profit
10 restaurants had popped up and entered the program and very
11 quickly seen pretty massive claims, correct?

12 A. They were concerned that these sites were competing with
13 the school district and diverting money from the schools.

14 Q. Okay. They were concerned that there was program
15 integrity issues, correct?

16 A. There was concern about the meal patterns.

17 Q. There was concern that Safari Restaurant claimed to be
18 serving more meals than attended the entire St. Paul School
19 District every day, correct?

20 A. That's what they indicated.

21 Q. Seemed like a reasonable concern to you, correct?

22 A. Depends. Only 58-ish percent of the children in
23 Minneapolis attend their schools, so there's a lot of
24 unaccounted-for children.

25 Q. Okay. All right. So in the fall of 2020 MDE cracked

1 down or tried to crack down, right? They tried to change
2 the rules, correct?

3 A. I don't know that they cracked down.

4 Q. They went to USDA and got clarification, to use your
5 phrase, about how for-profit restaurants could participate
6 in the program; is that right?

7 A. That's true.

8 Q. And ultimately they decided and USDA decided that
9 for-profit restaurants were not eligible to operate sites in
10 the program; is that right?

11 A. That's what MDE claimed. It was not accurate what USDA
12 had instructed.

13 Q. That's what MDE told you?

14 A. That's what MDE said.

15 Q. They weren't going to be allowing for-profit restaurants
16 to continue to participate in the program, correct?

17 A. They did not say they were not allowing. They asked for
18 clarification and additional information why those sites
19 qualified.

20 Q. In fact, they said that they wouldn't be allowed to
21 participate after October 2020, correct?

22 A. They didn't say that. They went in under my user and
23 switched the end date from December 31st to October.

24 Q. Let me show you Government Exhibit F6, which is an email
25 that you received from Emily Honer of MDE; isn't that right?

1 A. Correct.

2 Q. And it was an email she sent you on October 14th of
3 2020; is that right?

4 A. That's correct.

5 Q. And the subject line is "Updated Guidance, Restaurants
6 as a Site in SFSP," correct?

7 A. Correct.

8 Q. The importance level high?

9 A. That's what it says.

10 Q. And it says, "Due to the influx of requests for
11 restaurants operating as distribution sites, MDE reached out
12 to USDA Midwest Regional Office for further guidance on
13 whether restaurants could function as SFSP sites." Correct?

14 A. That's what MDE said.

15 Q. And then it says, After providing USDA with MDE's
16 guidance and examples of site ID requests, USDA Midwest
17 Regional Office clarified on October 13th that restaurants
18 cannot operate as an independent site and should only be
19 involved as a meal vendor, correct?

20 A. That's how it always operates, yes.

21 Q. And it said, "Therefore, MDE cannot approve site IDs for
22 restaurants or other for-profit business that prepare food
23 to operate as distribution sites. Distribution sites with
24 an approved application in CLiCS will be updated with the
25 closing date of October 31st, 2020."

1 Is that what it says?

2 A. That's what it says.

3 Q. So these restaurants were no longer going to be able to
4 participate after October 31st, 2020, correct?

5 A. Incorrect. They were allowed to be a vendor, but could
6 not be a site operator.

7 Q. But they weren't actually enrolled in the program as
8 vendors at that point, were they?

9 A. There's no enrolling in the program as a vendor.

10 Q. They were enrolled in the program as sites, correct?
11 You had submitted the site applications?

12 A. The names were, as I've discussed, the name that was on
13 the building. And so that site was named Safari because
14 that was the signage on the building.

15 Q. And because Safari Restaurant was operating the site,
16 correct?

17 A. No. Feeding Our Future staff and volunteers were
18 distributing the food. Safari was the vendor.

19 Q. Okay. I want to be clear. You had never told MDE this
20 before, correct?

21 A. Incorrect.

22 Q. In fact, during this trial we've seen a bunch of Feeding
23 Our Future sites, correct?

24 A. Correct.

25 Q. Feeding Our Future Taylor?

1 A. Yeah.

2 Q. SIR Boxing?

3 A. Feeding Our Future Arcade, yes.

4 Q. Feeding Our Future Arcade?

5 A. Yeah.

6 Q. And they were all listed as Feeding Our Future sites,
7 correct?

8 A. Some of them. Not all.

9 Q. And these sites -- in contrast, when it said "Safari,"
10 that was the entity enrolling in the program. It never said
11 Feeding Our Future was running the site, correct?

12 A. Incorrect. I had sent MDE numerous emails informing
13 them that Feeding Our Future was operating these sites in
14 compliance. There's a USDA memo, 132011, that clarifies the
15 site versus the vendor.

16 Q. So each of these sites, then, you are saying now, are
17 Feeding Our Future sites, correct?

18 A. It had been said way prior to October of 2020 several
19 times.

20 Q. I must have missed it in your emails, but I didn't miss
21 this one.

22 Government Exhibit F7 is an email you sent to MDE
23 six days later on October 20th, correct?

24 A. Yes. I clarified this issue for them probably ten or
25 more times through the course of application periods, the

1 litigation. We repeatedly clarified and informed MDE that
2 they were Feeding Our Future sites.

3 Q. Well, it's funny you say that because just a few days
4 earlier than that you sent MDE a first correspondence about
5 these same sites. This is Government Exhibit F5, and this
6 is on October 7th.

7 So a week earlier you had sent MDE a letter about
8 your restaurant sites, correct?

9 A. MDE had requested --

10 Q. Ms. Bock, I'm asking whether you sent the letter.

11 A. I responded to a request.

12 Q. Okay. And you sent a letter?

13 A. Yes.

14 Q. And the letter talks all about the need to feed youth in
15 Minnesota, correct?

16 A. Correct.

17 Q. And it talks about these various sites --

18 A. It does.

19 Q. -- right?

20 And at no point does it say that Feeding Our
21 Future is actually operating these sites, does it?

22 A. No, because MDE had already been informed several times.

23 Q. It's strange that they're asking about for-profit
24 restaurant sites and you didn't say in this letter, oh, no,
25 no, these aren't for-profit restaurant sites, they're just

1 the vendor, these are Feeding Our Future sites. You never
2 said this on October 7th, did you?

3 A. Well, no because I found it strange that they were
4 requesting information they already had.

5 Q. So you thought you just wouldn't mention it?

6 A. That was not indicated in the request. So I responded
7 to what they were asking for. I then provided further
8 clarification when they indicated they still had questions.

9 Q. It's weird because it says here, "We recognize" -- this
10 is your writing -- "We recognize that for-profit sites are
11 required to operate as open locations." Correct?

12 A. Correct.

13 Q. It doesn't say these are nonprofit sites. It says -- it
14 describes them as for-profit restaurant sites, does it not?

15 A. That's how MDE continually referred to them and so that
16 is -- I used their terminology to respond, yes.

17 Q. This is your letter, correct?

18 A. It is.

19 Q. I know you like to blame MDE for things, but you wrote
20 this letter?

21 A. I don't like to blame MDE for things. I am telling what
22 happened.

23 I am stating that any for-profit sites are
24 required to operate as location -- open locations.

25 Q. And then you list your for-profit sites, correct?

1 A. The sites that MDE considered for-profit, yes.

2 Q. K's Grocery and Deli, correct?

3 A. Correct.

4 Q. Brava Restaurant in Rochester?

5 A. Correct.

6 Q. One of Mr. Said's sites, correct?

7 A. It was someone he was --

8 MR. MONTEZ: Objection, Your Honor. Misstates the
9 testimony.

10 THE COURT: Overruled. You may answer.

11 THE WITNESS: It was a site that I know he was
12 affiliated with.

13 BY MR. THOMPSON:

14 Q. Brava Cafe, Ms. Marekegn's site?

15 A. Yes, the site we terminated.

16 Q. Lake Street Kitchen?

17 A. Another site that was terminated.

18 Q. ASA Limited?

19 A. Correct.

20 Q. Great Lakes?

21 A. Yes. Also terminated.

22 Q. All right. All clarifying about how these for-profit
23 restaurant sites, as you call them, are operating, correct?

24 A. Providing MDE the information they requested, yes. I
25 believe that --

1 Q. On October 7th; is that right?

2 A. Yes. This is responding to their request.

3 Q. And then it was a week later that MDE told you that
4 those restaurant sites could no longer operate in the
5 program and were going to have to be closed as of
6 October 31st of 2020, correct?

7 A. What they said is that they will not be approving new
8 site IDs, so they weren't going to be granting access to the
9 applications; and that any sites -- there had been some
10 locations, not under Feeding Our Future sponsorship, that
11 were operating as distribution sites. I do realize MDE
12 named some of them distribution, but they were always
13 operated by Feeding Our Future.

14 Q. Just not what you had said a week ago in your initial
15 email to MDE?

16 A. Oh, it had been covered since April or May of 2020 in my
17 emails.

18 Q. I understand.

19 And so because it had been covered so extensively,
20 six days later you felt the need to write a clarification,
21 correct, in Government Exhibit F7?

22 A. I responded to MDE's request. They had asked who was
23 operating the sites and stated that the site -- the Safari
24 and the other restaurants could be vendors, and so I was
25 again clarifying that that was the role they were playing.

1 Q. So these are your sites?

2 A. There was Feeding Our Future staff and trained
3 volunteers there.

4 Q. Okay. And this is the email you send to MDE on
5 October 20th, 2020, "Please see attached clarification of
6 how Feeding Our Future will be operating some of our sites."
7 Correct?

8 A. That's correct.

9 Q. And you start the letter, "I am sorry for any confusion.
10 Based on the documents and letter request, I did not see a
11 space to indicate that Feeding Our Future will be staffing
12 the following locations." Correct? That's what --

13 A. Yes, because --

14 Q. That's what it says?

15 A. It is.

16 Q. Okay. And that's important because if -- but for that,
17 they would no longer be allowed to participate in the
18 program, correct?

19 A. That is how they had always been operating, and so that
20 was why it was not addressed in the initial letter.

21 Q. "A catering contract is held with each food vendor, but
22 their function is limited to preparing the food. They do
23 not participate in distributing the meals." Correct?

24 A. Correct.

25 Q. Feeding Our Future distributed the meals is what you are

1 telling MDE, correct?

2 A. I am telling MDE that Feeding Our Future staff and/or
3 Feeding Our Future trained volunteers will be distributing
4 the food.

5 Q. And then you have a list of sites at which Feeding Our
6 Future staff and volunteers are distributing the food; is
7 that right?

8 A. Or site staff that had been trained by Feeding Our
9 Future.

10 Q. And one of those sites, on page 2 of Government
11 Exhibit F7, is ASA Limited, correct?

12 A. Correct.

13 Q. Salim Said's company?

14 A. Yes.

15 Q. His site?

16 A. I wouldn't call it his site.

17 Q. Okay. You sent him the checks, I take it?

18 A. I sent him a photo of the check, but all records
19 indicated that he was not at that location doing the food
20 distribution.

21 Q. Because Feeding Our Future was?

22 A. No.

23 Q. That's what it says, right?

24 A. It says --

25 Q. This site is being staffed by Feeding Our Future,

1 correct?

2 A. Feeding Our Future's trained staff and volunteers and
3 sponsor-trained site staff serving as volunteers.

4 Q. Feeding Our Future people?

5 A. People trained by Feeding Our Future, yes.

6 Q. They're the ones distributing all the meals --

7 A. Yes.

8 Q. -- is that right?

9 At the ASA Limited site?

10 A. At a variety of sites.

11 Q. I'm talking about ASA Limited right now.

12 A. Yes, they were sponsor trained.

13 Q. So, Ms. Bock, I just want to make clear that all those
14 meal counts we looked at earlier with ASA Limited starting
15 five days later than this, where it says 3,000 breakfast,
16 3,000 lunch a day -- do you remember those meal counts?

17 A. I do.

18 Q. -- you are telling MDE that those were distributed by
19 Feeding Our Future staff; is that right?

20 A. It's not.

21 Q. That Feeding Our Future ran that site?

22 A. That we were operating.

23 Q. That you operated the site, correct?

24 A. Part of it, yes.

25 Q. Okay. So all those meal counts we saw for ASA Limited,

1 those are Feeding Our Future meal counts, would you agree?

2 A. No, that's not what I said.

3 Q. Okay.

4 A. The meal counts were completed by site staff or --

5 Q. Or Feeding Our Future employees or volunteers, correct?

6 MR. UDOIBOK: Objection. Badgering. May we
7 approach, Your Honor?

8 THE COURT: Overruled.

9 THE WITNESS: Staff and volunteers and
10 sponsor-trained site staff serving as volunteers. It was
11 not necessarily an employee or a direct volunteer for
12 Feeding Our Future.

13 BY MR. THOMPSON:

14 Q. Trained sponsor being Feeding Our Future, correct?

15 A. Yes. Feeding Our Future is required by law to train all
16 operators.

17 Q. All right. So Brava Restaurant, that's another site
18 that we talked about this morning, correct?

19 A. Correct.

20 Q. To whom you sent photos of the checks and notifications
21 of the checks to Mr. Said?

22 A. Correct.

23 Q. A site down in Rochester?

24 A. Yes.

25 Q. A site that Sharmake Jama testified about earlier in

1 this trial, correct?

2 A. He did.

3 Q. Okay. And he said those were fraudulent, his meal
4 counts, correct?

5 A. He did. However, during the investigation those vendors
6 were contacted and had verified those invoices.

7 Q. That was his -- okay.

8 But your Feeding Our Future staff were down there
9 operating that site; is that right?

10 A. No. Again, it wasn't staff necessarily. It could be
11 sponsor-trained site staff.

12 Q. Serving as volunteers?

13 A. Yes.

14 Q. Do you know who wasn't a volunteer?

15 A. What's that?

16 Q. Do you know who wasn't a volunteer?

17 A. Who?

18 Q. Sharmake Jama, he wasn't a volunteer, was he?

19 A. No. He was the vendor that was responsible for
20 preparing the meals. He would not be the one distributing
21 it --

22 Q. Gotcha.

23 A. -- to the participants.

24 Q. All right. Let's talk about some of the other ones
25 here.

1 Olive Management, that's on here, correct?

2 A. It is.

3 Q. That's another one of Mr. Said's affiliated sites,
4 correct?

5 A. It was -- yes.

6 Q. In St. Cloud?

7 A. Yes.

8 Q. You paid over \$5 million in Federal Child Nutrition
9 Program funds to Olive Management in St. Cloud?

10 A. They were reimbursed that, yes.

11 Q. Okay. And those were based on submissions that you sent
12 and certified via the CLiCS system, correct?

13 A. They were based on the review, approval and processing
14 of the claim and then the review and processing by
15 CenterPilot prior to being submitted to MDE.

16 Q. Was that a yes, you clicked to certify?

17 A. Again, I certified that they were in the correct
18 reimbursement category, that the documentation was available
19 and there was no deliberate misrepresentation.

20 Q. And when MDE tried to close down the Olive Management
21 site on October 31st, 2020, you said, no, the site is
22 actually being staffed by Feeding Our Future --

23 A. Again --

24 Q. -- trained volunteers, correct?

25 A. Again, MDE had been told that multiple times prior to

1 this email, but, yes, we reconfirmed that staff and trained
2 volunteers would be distributing the meals.

3 Q. To be clear, had you not sent this letter, Olive
4 Management would have been shut down on October 31st, 2020,
5 correct?

6 A. Not necessarily.

7 Q. MDE already said it was intending to, correct?

8 A. MDE said that, yes.

9 Q. So presumably MDE would have stopped paying come
10 October 31st, 2020?

11 MR. UDOIBOK: Objection. Calls for speculation.

12 THE COURT: Overruled. You may answer.

13 THE WITNESS: No, because I would have provided
14 them with clarification, even if they hadn't requested it,
15 letting them know how the site was operating because we
16 always ensured, to the best of our ability, that the sites
17 were complying with the federal regulations.

18 BY MR. THOMPSON:

19 Q. Page 6, Safari Restaurant. The same thing, correct?

20 A. Correct.

21 Q. This is the one -- one of the ones that triggered MDE to
22 bar the participation of for-profit restaurants, correct?

23 A. For-profit restaurants were never barred.

24 Q. They were trying to shut them down, Ms. Bock?

25 A. No. They were trying to ensure that they were meeting

1 the regulations.

2 Q. Ms. Bock, it says here, "Distribution sites with an
3 approved application will be updated with a closing date of
4 October 31st, 2020."

5 That included Safari Restaurant, correct?

6 A. As I said --

7 Q. Ms. Bock, did that include Safari Restaurant?

8 A. No. Safari Restaurant was not a distribution site.
9 They were a vendor.

10 Q. Okay. But they had a -- okay. Then why did you provide
11 a clarification?

12 A. Because MDE requested it. I provided clarification
13 stating the same thing probably five or six times.

14 Q. I'll tell you what, Ms. Bock. Let's look at all the
15 sites and the meal counts that the Feeding Our Future sites
16 listed in your letter, Government Exhibit F7, did. Okay?

17 A. Okay.

18 Q. Does that sound good?

19 All right. We're on page 2 of Government
20 Exhibit F7. There's a site called K's Grocery; is that
21 right?

22 A. Correct.

23 Q. K's Dollar Grocery?

24 A. Yes.

25 Q. Okay. And I'm going to show you on the right side of

1 the screen Government Exhibit Q60 at page 6, which is the
2 meal counts for the Feeding-Our-Future-operated K's Grocery
3 site.

4 A. Correct.

5 Q. And this is for January of 2021; is that right?

6 A. It is.

7 Q. Exactly 1,000 kids a day?

8 A. Again, when you are passing out bundled meals, the
9 number would be --

10 Q. Ms. Bock, I'm just asking about the number.

11 A. -- consistent.

12 Q. Ms. Bock, I'm just asking about the number.

13 A. I answered.

14 Q. 1,000 a day?

15 A. Correct.

16 Q. Amazing.

17 Again I'm showing you here Government
18 Exhibit Q162. We have the meal counts for the
19 Feeding-Our-Future-run K's Grocery site for March of 2021;
20 is that right?

21 A. Yes.

22 Q. Exactly 1,000 a day?

23 A. For one-day-a-week distribution.

24 Q. Let's go down to page 3. There's a Feeding Our Future
25 site called Great Lakes; is that right?

1 A. Correct.

2 Q. Being staffed by Feeding Our Future?

3 A. And volunteers or site staff trained by Feeding Our
4 Future.

5 Q. And then I'm showing you Government Exhibit Q54. We
6 have meal counts for the Feeding-Our-Future-run Great Lakes
7 site in May of 2021; is that right?

8 A. It is. They were terminated after this.

9 Q. Exactly 2,500 meals a day?

10 A. Again, that's expected with a one-day-a-week seven-meal
11 distribution.

12 Q. That exactly 2,500 people would show up that day?

13 A. That that was their limit, so there may have been more.
14 There may have --

15 Q. More than 2,500 kids showed up every day?

16 A. I didn't say that. I said there may have been.

17 Q. You literally just said that, Ms. Bock.

18 A. I didn't. I said --

19 Q. So you're not saying that more than -- are you saying
20 that more than 2,500 kids showed up at the Great Lakes site
21 each day?

22 A. I was not there.

23 Q. Okay. It was a Feeding-Our-Future-operated site,
24 though, correct?

25 A. It was operated by Feeding Our Future volunteers and/or

1 site staff trained by volunteers.

2 Q. Okay. On the right side of the screen I'm showing you
3 Government Exhibit Q55, which is Great Lakes -- an email
4 from Sade Hashi, the owner of Great Lakes, correct?

5 A. Correct.

6 Q. To you?

7 A. Yep.

8 Q. These are those meal counts, 2,500 a day, correct?

9 A. Correct.

10 Q. Sent to you?

11 A. Sent to me and forwarded to claims.

12 Q. Okay. How about Nawal Restaurant? On page 5 of
13 Government Exhibit F7, that's another site that you
14 told Feeding Our -- or you told MDE was being operated by
15 Feeding Our Future, correct?

16 A. Or its volunteers or trained volunteers.

17 Q. In order to keep it open past October 31st of 2020?

18 A. No.

19 Q. And this is a site run by Mr. Awale, who testified at
20 trial here?

21 A. It is.

22 Q. And I'm showing you Government Exhibit Q4. It looks
23 like 1,200 kids a day showed up at this site, correct?

24 A. There's a range, but, yes, occasionally 1,200.

25 Q. And Mr. Awale testified at trial here, correct?

1 A. He did.

2 Q. He testified that these were fraudulent, correct?

3 A. Correct.

4 Q. I guess the Feeding Our Future site staff didn't catch
5 it?

6 A. That's not accurate.

7 Q. They did catch it?

8 A. They were not necessarily Feeding Our Future site staff.
9 They were volunteers trained by Feeding Our Future. And all
10 claims were verified by the staff, including invoices and
11 backup invoices.

12 Q. And submitted by you?

13 A. After it had gone through the process of review, yes, I
14 entered the numbers into CLiCS.

15 Q. Another one, Feeding Our Future Evergreen Grocery,
16 correct?

17 A. Correct.

18 Q. Another Feeding-Our-Future-operated site?

19 A. Yes.

20 Q. I'm showing you on the right Government Exhibit Q117. A
21 little hard to read here, but I'm seeing in February 2021
22 3,000 a day at Evergreen Grocery, correct?

23 A. That's how many were prepared, yes, and then it varied
24 how many were distributed.

25 Q. Now, you said earlier that this was a seven-day meal

1 packet. This isn't a seven-day meal pack, is it?

2 A. This particular one is not.

3 Q. So the meal count is claiming that every day nearly
4 3,000 kids showed up at Evergreen Grocery to get food,
5 correct?

6 A. That's what the meal count says, yes.

7 Q. And we can tell because the food temperature fluctuates
8 every day, correct?

9 A. Yes, it does.

10 Q. And the number of kids showing up changes every day --

11 A. Correct.

12 Q. -- correct?

13 The site supervisor is Najmo Ahmed. Do you know
14 who that person is?

15 A. I don't.

16 Q. You don't.

17 Would you surprise you to hear that she says there
18 was no Feeding Our Future people there?

19 A. It actually would, because I do know this site and she
20 herself was on Feeding Our Future's payroll receiving direct
21 deposit pay checks.

22 Q. I saw that. That's weird. She didn't really know she
23 was on the payroll, though, did she?

24 A. Well, there was an employee file with her information,
25 including a Social Security number and other confidential

1 information, at Feeding Our Future.

2 Q. Was that kept next to the board of directors files with
3 the information about Ben Stayberg?

4 A. No. It was kept in the file with the staff folder.

5 Q. Okay. Lido Restaurant, we know this one. Lul Ali,
6 correct?

7 A. Yes.

8 Q. At page 5 of Government Exhibit F7?

9 A. Correct.

10 Q. That's a site down in Faribault, correct?

11 A. Correct.

12 Q. Ms. Ali testified at trial, correct?

13 A. She did.

14 Q. Testified that these are fraudulent, correct?

15 A. She did.

16 Q. And she, too, at her site, here at Government
17 Exhibit Q44, 1,000 a day, correct?

18 A. That's what was prepared.

19 Q. Right to the max, right?

20 A. Yes, that's what she prepared or purported to prepare.

21 Q. Because she didn't really do that, did she?

22 A. No. So this was a site, as she testified, that was
23 coordinated with Eidleh, making it very difficult when you
24 have a staff that's part of the fraud and telling them
25 everything that we're looking for so that they can prepare

1 the documentation and ensure it goes through our process.

2 Q. Well, she said more than that. She said she talked to
3 you on FaceTime, I recall, correct?

4 A. She said that. I have never talked to her.

5 Q. You've emailed her?

6 A. Maybe once or twice. I know she emailed me requesting a
7 second site, but I don't recall any other emails.

8 Q. You paid her millions of dollars, correct?

9 A. Reimbursed meals to the business.

10 Q. You submitted her claims?

11 A. After they had gone through the process and been
12 approved.

13 Q. At the bottom here of Government Exhibit F7 on the right
14 of the screen, S & S Catering, you also told MDE that that
15 was being staffed by Feeding Our Future, correct?

16 A. Not necessarily staffed. I said that Feeding Our
17 Future's trained staff and volunteers or site staff that had
18 been trained by Feeding Our Future would be operating it.

19 Q. And you said only Feeding Our Future's trained staff and
20 volunteers and sponsor-trained site staff serving as
21 volunteers are permitted to distribute meals, correct?

22 A. Yeah, the law is that they have to be trained by the
23 sponsor if they play any role in the food program at all.

24 Q. Now, S & S Catering, that was a large site, correct?

25 A. For a period of time while it was open, yes.

1 Q. And, in fact, it was a very large site located only a
2 block away from your other really -- one of your other
3 really large sites, correct?

4 A. Yes.

5 Q. Safari Restaurant?

6 A. Correct.

7 Q. They were both -- Safari Restaurant was doing five or
8 six thousand kids a day, correct?

9 A. At various times, yes.

10 Q. And then S & S Catering was doing 5,000 kids a day,
11 correct?

12 A. They were serving opposite meals. And so one site would
13 offer breakfast and lunch. The other would offer a snack
14 and supper. So, yes, parents would likely go from one to
15 another.

16 Q. That's what you thought happened?

17 A. At that time, given that there were no grocery stores
18 and the need was high during the pandemic, yes, we believed
19 that was what was happening.

20 Q. And this is through 2020 and 2021, correct?

21 A. Yes. The pandemic was still going. Unemployment was
22 still high. And we have learned that once people learned
23 they can get free things, they often stick with it. Even if
24 they were re-employed, could afford it, if it was available,
25 they would get it.

1 Q. Let's take a look at the meal count claims for S & S
2 Catering. I'm showing you Government Exhibit Q3. This is
3 an email from Sahra Nur to you, correct?

4 A. Correct. From time to time sites would email me their
5 information.

6 Q. Sahra Nur certainly did, right?

7 A. For this particular one, yes.

8 Q. She was your friend?

9 A. She was not.

10 Q. You guys were close, correct?

11 A. No.

12 Q. She would come to Feeding Our Future with some
13 regularity?

14 A. She would come from time to time. She rarely met with
15 me. Once in a while.

16 Q. Threw you a big party?

17 A. No.

18 Q. And this is for -- this isn't even S & S. This is the
19 site upstairs, correct? They had two sites in that
20 building, correct?

21 A. For a period.

22 Q. So you had Safari Restaurant, correct?

23 A. Yes.

24 Q. Five or six thousand kids a day?

25 A. Correct.

1 Q. A block away you had S & S Catering, correct? They were
2 doing it times -- 2,500 or 5,000 kids a day, correct?

3 A. Yes.

4 Q. And then upstairs on this two-floor storefront, they
5 were doing 2,500 kids a day at Academy for Youth Excellence;
6 is that right?

7 A. That's what it says.

8 Q. Okay. And that's what you submitted to MDE, correct,
9 for reimbursement?

10 A. That's what the staff would have reviewed and adjusted
11 or denied or approved; and once it went through the process,
12 yes, I would enter it into CLiCS.

13 Q. And looking here at Q7, in April they were claiming
14 5,000 kids a day at Academy for Youth Excellence, the site
15 upstairs on the second floor from S & S Catering, correct?

16 A. Yes. S & S Catering was closed on April 30th of 2021
17 and so this was the only location open.

18 Q. 5,000 a day every day?

19 A. That is what it says. Again, they were doing, I
20 believe, one-day-a-week distribution.

21 Q. Now, they weren't actually do doing that, though. We
22 heard from Qamar Hassan, the owner of S & S Catering,
23 correct?

24 A. Correct.

25 Q. They weren't actually doing --

1 A. They were not. Based on the information we had at the
2 time, they were approved at that.

3 Q. Okay. So you thought they were?

4 A. The documentation submitted and the backup documentation
5 and any investigation did not leave us with enough
6 information to determine they weren't valid.

7 Q. You saw that form and thought that looks good?

8 A. I didn't see this form.

9 Q. Well, I guess you saw the other one, didn't you?

10 A. I received it. Like I've said, if it was claim
11 information, it was forwarded to the claims department.

12 Q. Never once looked?

13 A. At meal counts? No.

14 Q. Never?

15 A. Maybe once in a while.

16 Q. Okay. Ms. Bock, I'm going to ask you this. I want to
17 be very clear. Are you sitting there on the stand and
18 saying right now you never once looked at a meal count?

19 A. I said not very often. I would look at them, yes. Most
20 of the time that I looked at them was when the staff was
21 asking me questions. If they came in via an email, the
22 majority of the time I forwarded them back on. But, yes, of
23 course I've looked at --

24 Q. I just want to be clear, because if I heard you
25 correctly -- and I may not have -- you said I've never

1 looked at a meal count.

2 A. I don't recall -- I, of course, have looked at meal
3 counts. We operated Southcross and I completed the meal
4 counts.

5 Q. And they look similar to the ones we've seen, correct?

6 A. Some of them, yes.

7 Q. Now, these sites we just looked at, there's some pretty
8 big ones here, right?

9 Brava Cafe was a Feeding-Our-Future-operated site,
10 according to your email to MDE, correct?

11 A. Trained staff and volunteers were there. Brava Cafe was
12 also determined to be fraudulent and terminated, as well as
13 reported to MDE and the Attorney General.

14 Q. We'll talk about that in a second.

15 \$5.7 million that you -- were the claims that you
16 submitted on behalf of Brava Cafe, correct?

17 A. Again, they were the claims that were reviewed and
18 approved by the staff. So, yes, they were submitted.

19 Q. And then you wrote the checks, correct?

20 A. I'm the only signer on the account, so, yes, I had to
21 write the checks.

22 Q. All right. Let's talk about -- you mentioned Lake
23 Street and you called it a food desert; is that right?

24 A. Yes.

25 Q. And I guess I understand why you did, because you had

1 almost two dozen Feeding Our Future sites down on Lake
2 Street at one point; is that right?

3 A. Yes, there were.

4 Q. And I don't know where the members of the jury are from,
5 but some of them may be from Minneapolis and some may not.

6 Lake Street is about, what, two or three miles
7 south of here, right?

8 A. I don't know from here --

9 Q. Just south --

10 A. -- but, yes, I will trust -- I don't --

11 Q. Just south of downtown, right?

12 A. Okay.

13 Q. Center of the city?

14 A. I'm sorry. I -- yes, I will trust you. It is in
15 Minneapolis. It's in South Minneapolis. I don't know
16 directionally from here where it is or --

17 Q. Ms. Bock, I would think you would know more about it.
18 You had 21 sites operating there. In the month of
19 March 2021 your entity --

20 A. Like I --

21 Q. -- claimed to serve 1.7 million meals on a 1.8-mile
22 stretch of Lake Street.

23 A. Like I said, I know where Lake Street is. I don't know
24 directionally from this location how far away it is or where
25 it is.

1 Q. Now, you called Lake Street a food desert; is that
2 right?

3 A. Multiple research and years of data has shown that it
4 is, in fact, a food desert.

5 Q. And you talked yesterday about the George -- murder of
6 George Floyd and the riots afterwards, correct?

7 A. I talked about the destruction of the food sources.

8 Q. And that was in May of 2020, correct?

9 A. Correct.

10 Q. And you mentioned that there was several food grocery
11 stores on Lake Street at that time, correct?

12 A. That had been damaged, yes.

13 Q. Was it Target?

14 A. There was a Target.

15 Q. There was a Cub Foods?

16 A. Correct.

17 Q. There was an Aldi?

18 A. Yes.

19 Q. All grocery stores?

20 A. All closed.

21 Q. It was a Super Target, so it had a grocery store too,
22 right?

23 A. It was closed.

24 Q. It was closed in May of 2020; is that right?

25 A. For a long period of time. In fact, I don't know that

1 that particular Target has even reopened.

2 Q. Actually, isn't it true, Ms. Bock, that it reopened in
3 September of 2020, just a few months after --

4 A. I don't know.

5 Q. -- the riots? And, in fact -- November of 2020.

6 The Aldi actually reopened in September of 2020;
7 isn't that true?

8 A. I don't know.

9 Q. And the Cub Foods reopened in February of 2021 --

10 A. Yes.

11 Q. -- correct?

12 A. I will take your word for it.

13 Q. So this is hardly --

14 MR. UDOIBOK: Objection. Assumes facts not in
15 evidence.

16 THE COURT: Overruled. The answer will stand.

17 BY MR. THOMPSON:

18 Q. So by February of 2021, those three grocery stores that
19 you mentioned had all reopened; isn't that true?

20 A. They had reopened.

21 Q. Okay. So no longer a huge food desert, those grocery
22 stores were back?

23 A. Incorrect. It has been a food desert. It remains a
24 food desert.

25 Q. Well, let me show you what's been admitted as Government

1 Exhibit X70. And on page 2 here, this is that stretch of
2 Lake Street, right?

3 A. Yep.

4 Q. And this will help you directionally. We're in downtown
5 Minneapolis right around here (indicating); is that right?

6 A. Yes.

7 Q. That's the U.S. Bank stadium (indicating)?

8 A. Yeah.

9 Q. And so we're a couple blocks away?

10 A. Yeah.

11 Q. This is Interstate 94 and the tunnel (indicating)?

12 A. Yes.

13 Q. This is 35W going south (indicating)?

14 A. Yes.

15 Q. All right. And this is the stretch here (indicating),
16 right?

17 A. Correct.

18 Q. The lake formerly known as Lake Calhoun is right over
19 here on the right -- on the left-hand side of the screen,
20 correct?

21 A. I didn't know there was one.

22 Q. And then the Mississippi River here (indicating)?

23 A. Correct.

24 Q. And you had 21 Feeding Our Future sites in this 1.8-mile
25 stretch, correct?

1 A. Correct.

2 Q. Including Safari Restaurant?

3 A. Yes.

4 Q. S & S Catering?

5 A. Correct.

6 Q. Academy for Youth Excellence, the site upstairs from
7 S & S Catering?

8 A. Yes.

9 Q. You had that -- you had two sites located at 2854
10 Columbus Avenue; is that right?

11 A. Correct.

12 Q. And they started in April. They were kind of a slow
13 growth, but by March of 2021 you submitted claims through
14 CLiCS stating that these sites distributed 1.7 million meals
15 in the month of March 2021; is that right?

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

17 Q. That is something on the order of 55,000 meals per day,
18 correct?

19 A. I'll take your word for it.

20 Q. The population of Minneapolis is about 400,000 people,
21 right?

22 A. Again, I don't know the exact number off the top of my
23 head, but, yeah, I believe when I reviewed census data, it
24 was around four, close -- maybe between five.

25 Q. So that would be distributing -- Feeding Our Future,

1 your organization, claiming to give enough meals to feed
2 10 or 15 percent of the entire population of the city of
3 Minneapolis?

4 A. No.

5 Q. No?

6 A. They were not all in -- all of the people fed were not
7 in or from Minneapolis.

8 Q. They were from other cities?

9 A. Yes.

10 Q. But, of course, you had sites in those other cities too,
11 correct?

12 A. Not all.

13 Q. St. Paul?

14 A. Yes.

15 Q. Brooklyn Park?

16 A. Yes. There were sites located throughout, but the home
17 delivery authorizations that every family fills out
18 indicated that they were coming from places that there were
19 not sites, at least not sites from Feeding Our Future.

20 Q. They all came down to Lake Street to get food?

21 A. No. As I said, they were home delivery authorizations,
22 meaning it was being delivered to their home.

23 Q. Well, that's not what we saw in those meal counts we
24 were looking at, was it?

25 A. The meal counts are the number that are distributed. It

1 doesn't indicate anywhere on there whether it was pickup or
2 delivery.

3 Q. So you are saying that these sites drove around to 5,000
4 homes and delivered meals?

5 A. I'm saying that a number of the sites did have massive
6 teams that were doing food distribution, and that based on
7 the information and the delivery authorizations we had, that
8 was what was happening.

9 Q. Were Feeding Our Future employees driving people --
10 driving food around and delivering it?

11 A. Not that I know of.

12 Q. I would assume not. You would have some sort of
13 insurance issues, wouldn't you, liability issues?

14 A. I would assume so.

15 Q. And I assume you didn't get insurance to have employees
16 driving tens of thousands of meals around the entire state
17 of Minnesota every day?

18 A. Correct.

19 Q. Okay. And these number continue. In April 2021,
20 1.7 million meals at these 21 sites on Lake Street, correct?

21 A. Yep. And after this the sites start getting closed.

22 Q. Okay. And that's from the State of Minnesota, correct?

23 A. Not correct.

24 Q. October 2021 still over 800,000 meals at these sites,
25 correct?

1 A. Correct.

2 Q. And Safari and S & S Catering were vendors at that
3 point, right?

4 A. Yes.

5 Q. That number includes meals that they purported to vend
6 to other sites, correct?

7 A. No, because you are looking at the 1.8 miles on Lake
8 Street.

9 Q. Now, I know we talked about COVID. COVID happened in
10 April -- what, March, April 2021 [sic]; is that right?

11 A. Yes.

12 Q. February?

13 A. Mm-hmm.

14 Q. March?

15 Schools shut down in the spring of 2021 [sic]; is
16 that right?

17 A. They did.

18 Q. And vaccines came out at the end of 2020; is that right?

19 A. Vaccines came out, but the economic impact took a while
20 to recover from. A lot of these people are renters who had
21 not been making rent payments and falling behind on other
22 bills. So food, from what we were seeing and what my staff
23 was reporting, was still a huge need.

24 Q. Okay. Were your staff reporting stuff about the
25 spending by the people who owned these sites?

1 A. The vendors, we do not have any oversight over their
2 bank accounts.

3 Q. So you did hear about it, I assume?

4 A. Not at that point, no.

5 Q. The luxury cars?

6 A. No.

7 Q. The big houses?

8 A. No.

9 Q. The commercial buildings?

10 A. No.

11 Q. In fact, you warned people not to be too flashy with
12 their money; isn't that right?

13 A. No, it's not.

14 Q. All right. Now, Ms. Bock, I want to change gears a
15 second.

16 You talked on direct at some length, I think you
17 just mentioned earlier that you had claimed that you had
18 kicked out sites; is that right?

19 A. Yes.

20 Q. In fact, you said, if I remember correctly, that you had
21 done an investigation because it really was important to you
22 that this program was run right?

23 A. Absolutely.

24 Q. You were passionate about it?

25 A. I was.

1 Q. You're passionate about feeding kids, that's what you
2 said, right?

3 A. Yes.

4 Q. You didn't want to see the program abused --

5 A. No.

6 Q. -- right?

7 You didn't want to see people profit
8 inappropriately on funds designed to feed children?

9 A. Right, and that's why I attempted to get MDE and the
10 Attorney General -- and even when the agents were at my
11 house, I promised that I would help catch anyone who was
12 committing fraud.

13 Q. Well, you did a heck of a job of it, Ms. Bock.

14 You said on direct and you had a list -- your
15 lawyer had a list of sites that you terminated; is that
16 right?

17 A. Yes.

18 Q. And I think you mentioned Great Lakes. You said you
19 terminated Great Lakes; is that right?

20 A. We did.

21 Q. Sambusa King, you said you terminated Sambusa King?

22 A. I said it was closed.

23 Q. You said you terminated Evergreen?

24 A. They were closed.

25 Q. Lido Restaurant?

1 A. Those sites were closed in April of '21 when we learned
2 they would not be able to participate or not be on the
3 summer program. By the time fall came around, we decided to
4 not --

5 Q. You know where I'm going with this, don't you?

6 A. No.

7 Q. Because you suggested on direct that you had taken steps
8 and this was part of your ongoing efforts to investigate and
9 root out fraud in the program, didn't you?

10 A. No, that's not what I said. What I said is that they
11 were closed in April of 2021. They would not be approved
12 for summer. And by the time fall came around, we did not
13 desire to have them open.

14 Q. Okay. So you're saying that they closed. Did you close
15 them or who closed them?

16 A. In April 2021 the program ended.

17 Q. Okay. And then MDE kicked them out; is that right?

18 A. Not that I recall.

19 Q. And you didn't want them to get kicked out, did you?

20 A. I guess I'm not -- did I want them kicked out? It
21 didn't --

22 Q. In fact, you fought it, correct?

23 A. No. Around that time there was an appeal filed.

24 Q. Yeah. You appealed?

25 A. Yeah, as the sponsor we are obligated to honor the

1 site's request because we are the gateway with their
2 application. So if their application was denied or the
3 limits had been reached and they wanted us to appeal, we
4 would appeal.

5 Q. So they all wanted you to appeal, that's what your
6 testimony is?

7 A. To my recollection, yes.

8 Q. Okay. All right. So the reality is, Ms. Bock, that MDE
9 terminated these sites, correct?

10 A. Not that I recall. The program ended.

11 Q. They denied them, correct?

12 A. They may have denied them for summer. That was because
13 there was a regulatory cap that Feeding Our Future had met.
14 However --

15 Q. Ms. Bock, I didn't ask you -- there's no question
16 pending.

17 MDE denied the summer sites and you didn't like
18 that, so you appealed it, correct?

19 A. Incorrect.

20 Q. Okay. Well, let's take a look. I'm going to show you
21 now what's been marked, but not yet admitted, as Government
22 Exhibit R25.

23 Do you recognize this email?

24 A. Yes.

25 Q. You sent it, correct?

1 A. I did.

2 Q. To Feeding Our Future staff?

3 A. Yes.

4 Q. And the subject line is "Denied Summer Sites," correct?

5 A. Yes. This is in June of '21.

6 MR. THOMPSON: Your Honor, I move to admit
7 Government Exhibit R25.

8 THE COURT: Any objection?

9 MR. UDOIBOK: No objection.

10 MR. MONTEZ: No objection.

11 THE COURT: R25 is admitted.

12 BY MR. THOMPSON:

13 Q. All right. Ms. Bock, at the top here, this is an email
14 from you, aimee@feedingourfuturemn.org; is that right?

15 A. It is.

16 Q. That's the email address you used?

17 A. Yes.

18 Q. And you sent it to all Feeding Our Future office staff,
19 correct?

20 A. Correct.

21 Q. The subject line, "Denied Summer Sites" --

22 A. Yes.

23 Q. -- correct?

24 On February 25th of 2021?

25 A. June 25th of 2021.

1 Q. June 25th. Okay.

2 And you say, "The following sites have been
3 denied." Correct?

4 A. For the summer program, yes.

5 Q. Brava Cafe?

6 A. Correct.

7 Q. Evergreen?

8 A. Correct.

9 Q. Lido?

10 A. Correct.

11 Q. S & S Catering?

12 A. They were one of many, yes.

13 Q. Safari?

14 A. Yes.

15 Q. Great Lakes?

16 A. Correct.

17 Q. K's Dollar?

18 A. Yes.

19 Q. I think you said earlier that -- this afternoon after
20 lunch that Great Lakes was terminated, correct?

21 A. They were.

22 Q. Okay.

23 A. We had --

24 Q. Not by you, though?

25 A. Yes.

1 Q. By MDE?

2 A. This was for the summer program only, and that's because
3 there was a regulatory cap.

4 Q. Ms. Bock, they were denied, correct?

5 A. For the summer program.

6 Q. And you were unhappy with it?

7 A. Incorrect.

8 Q. Okay. Let's see what you said. "The reason they gave
9 is they are restaurants." Correct?

10 A. Correct, which is, again, another time that we had to
11 reclarify --

12 Q. Ms. Bock, I'm just asking you the words. Okay?

13 "The reason they gave is that they are
14 restaurants." Is that what it says?

15 A. That is what I said to the staff.

16 Q. Okay. And "they" being MDE?

17 A. Correct.

18 Q. So MDE denied these sites because they are restaurants,
19 correct?

20 A. Because they believed the restaurant was the site, yes.

21 Q. And they said that Stewart didn't have permission from
22 the park and rec. That's the site at a park site?

23 A. That's what they claimed.

24 Q. And you say, "Yes, I know. They are already
25 approved" -- "They already approved some restaurants. I

1 know it doesn't make sense. I don't know why they did this.
2 The attorney is working on the appeal tonight, and we should
3 have them submitted soon."

4 Is that right?

5 A. Yes, there was confusion on why some were being approved
6 and others not when they were all operating the exact same
7 way. And as I said, when sites are applying, part of the
8 agreement is we will appeal on their behalf.

9 Q. So when you talk about sites being terminated, these
10 were sites terminated by MDE, correct?

11 A. Incorrect.

12 Q. Okay. Well, that appears to be what you said in your
13 email on June 25th, 2025 [sic]; is that right?

14 A. They were denied for the summer program.

15 Q. Okay. Okay. So that's what you said?

16 A. Yes.

17 Q. And then you appealed because you wanted to keep them in
18 the program, correct?

19 A. I appealed because that is part of the agreement we make
20 with sites, is that we will represent them in appeals if
21 they --

22 Q. Okay.

23 A. -- desire.

24 Q. I'm going to show you R -- what's been marked, but not
25 yet admitted, as R28.

1 Is this an appeal that your attorney filed the
2 next day on behalf of Lido Restaurant?

3 A. Appears to be.

4 MR. UDOIBOK: Objection. Hearsay.

5 MR. THOMPSON: An agent statement.

6 THE COURT: Are you offering it?

7 MR. THOMPSON: Yes.

8 THE COURT: It hasn't been offered yet.

9 The objection is overruled. R28 is admitted.

10 BY MR. THOMPSON:

11 Q. So you said earlier, when I brought up Lido, that Lido
12 had been terminated, correct?

13 A. Eventually, yes, they were terminated. We did not allow
14 them to reopen.

15 Q. But they were -- when you use the verb "terminated,"
16 they were terminated not by Feeding Our Future, but by the
17 Minnesota Department of Education, correct?

18 A. Incorrect. They were denied for the summer program and
19 ultimately terminated by Feeding Our Future.

20 Q. Not before you filed a notice of appeal trying to keep
21 them in?

22 A. As I've said, part of the agreement of sponsors is that
23 we will bring them through the application process; and if
24 that includes an appeal, that is what happens.

25 Q. Your hands were tied?

1 A. Huh?

2 Q. Your hands were tied; is that your testimony?

3 A. My hands were tied? My obligation was to follow the
4 procedures when it came to site applications and including
5 submitting an appeal if needed.

6 Q. You also filed an appeal on behalf of S & S Catering; is
7 that right?

8 A. Appeals were filed on behalf of all of the sites that
9 had been denied for summer.

10 Q. Showing you now what's been marked, but not yet
11 admitted, as Government Exhibit R29. Is this the appeal
12 filed on behalf of -- or notice of appeal on behalf of S & S
13 Catering?

14 A. Yes. Again, all of the sites that had been denied were
15 appealed.

16 MR. THOMPSON: Your Honor, I'd move to admit
17 Government Exhibit R29.

18 MR. UDOIBOK: No objection.

19 MR. MONTEZ: No objection.

20 THE COURT: R29 is admitted.

21 BY MR. THOMPSON:

22 Q. So this is one of the fraudulent sites, correct, you
23 will agree?

24 A. Yes. In fact, we had opened an investigation into them
25 in 2021 after concerns with some of the sites they were

1 providing for.

2 Q. But nevertheless, you were upset when MDE denied their
3 participation and filed an appeal on their behalf? Yes or
4 no.

5 A. As I've said, I was not upset. I was following the
6 process.

7 Q. Okay. How about Brava? You've talked a lot about Brava
8 Cafe. You filed an appeal on their behalf as well?

9 A. Appeals were filed on behalf of all of the sites that
10 were denied.

11 Q. I'm showing you now what's been marked, but not yet
12 admitted, as Government Exhibit R27. Is this the notice of
13 appeal filed on behalf of Brava Cafe?

14 A. Yes. They all were the same format on behalf of all of
15 the sites that had been terminated.

16 MR. THOMPSON: Your Honor, I move to admit
17 Government Exhibit R27.

18 THE COURT: Any objection?

19 MR. UDOIBOK: No objection.

20 MR. MONTEZ: No objection.

21 THE COURT: R27 is admitted.

22 BY MR. THOMPSON:

23 Q. That's the Brava Cafe, another fraudulent site, correct?

24 A. Correct, that we terminated and reported to, like I
25 said, MDE and the Attorney General's Office seeking help.

1 Q. And on June 26th, 2021, you filed an appeal to try to
2 keep them in the program when MDE tried to deny their
3 participation, correct?

4 A. At that point they were working with Idleh and so we
5 did not have a full picture of what was happening at that
6 site. Had we known it was fraudulent, an application would
7 have never been submitted. But, yes, appeals were filed on
8 behalf of all of the sites.

9 Q. It was Idleh's fault?

10 A. I didn't say it was Idleh's fault. I said that based
11 on the information being submitted, as I explained, when you
12 have a staff member informing the sites of exactly what
13 we're looking for, exactly what the red flags are, as well
14 as reporting back that they have verified these meals, until
15 we learned that they were part of the fraud scheme, there
16 was no knowledge of it.

17 Q. Ms. Bock, you filed an appeal on behalf of Safari
18 Restaurant as well?

19 A. Again, appeals were filed on behalf of all of the sites
20 that --

21 Q. You say were filed, but appeals don't file themselves,
22 right? Feeding Our Future appealed, correct?

23 A. Feeding Our Future is the group that has to as the
24 sponsor.

25 Q. Yes. And you ran Feeding Our Future, correct?

1 A. Yes.

2 Q. You were the executive director --

3 A. Yes.

4 Q. -- correct?

5 A. Correct.

6 Q. You retained the lawyer to do this, correct?

7 A. Correct.

8 Q. So it's not true that they just -- the appeal was filed.
9 You had the appeal filed, correct? You did this. You were
10 the active party, correct?

11 A. The agreement states that we will work with the site
12 through the application process and that includes, if the
13 site is denied, appealing that decision.

14 Q. Okay. All right. I'm going to show you now what's been
15 admitted as Government Exhibit BB30b.

16 In fact, you reached out -- this is a text message
17 between you and Salim Said the day before -- or the day you
18 received that email -- or sent that email out --

19 A. Yes.

20 Q. -- about the site denials, correct?

21 A. Correct.

22 Q. And you told Salim Said that Safari was denied, correct?

23 A. That the operator within Safari was denied, yes.

24 Q. Okay. And that you were going to work on an appeal or
25 you had retained a lawyer to work on the appeal?

1 A. Our attorney is working on the appeal right now, yes.

2 Q. Thought this made no sense, correct?

3 A. Correct. Like I said, they had approved some that were
4 operating in the exact same way, but denied others and not
5 provided clarification or reasoning.

6 Q. They had pretty good reasons to deny these sites, you'd
7 agree, right?

8 A. I don't know that I would say that. Some of them, yes,
9 they turned out to be fraudulent. Others were not.

10 Q. Okay. Safari, those guys brought home tens of millions
11 of dollars, correct?

12 A. What's that?

13 Q. Safari, those guys bought tens of millions of dollars
14 worth of stuff with the food money, correct?

15 A. That is what you have shown as a vendor, though we
16 didn't track that.

17 Q. It seems like a good reason to deny their participation
18 in the Federal Child Nutrition Program, you would agree,
19 right?

20 A. They weren't the participant.

21 Q. Okay. Then why were you appealing their denial?

22 A. We were appealing the denial of the nonprofit working
23 within Safari. Safari was a vendor and so they are not
24 allowed to be a site.

25 Q. And that nonprofit was -- let me think about it --

1 Feeding Our Future?

2 A. At one point in time. Not the entire time.

3 Q. Okay. At this point in time it was Feeding Our Future,
4 correct?

5 A. I don't recall.

6 Q. Okay. Later on they started their own nonprofit,
7 correct, a different one?

8 A. I don't know who -- I know who started it now, but, yes,
9 there was a nonprofit that moved in.

10 Q. All right. So you didn't just file an appeal, though,
11 right? You took more steps to pressure MDE to allow Safari
12 Restaurant, S & S Catering, Brava Cafe, et cetera, to
13 continue to participate in the program after June 2021,
14 correct?

15 A. There was a rally.

16 Q. You held a rally?

17 A. We did.

18 Q. You held it, you called it, correct?

19 A. I said -- yes.

20 Q. Okay. So you rallied people to go to MDE and protest,
21 correct?

22 A. To draw attention to the issues that existed with MDE.

23 Q. Okay. You wanted to keep those sites in the program,
24 correct?

25 A. No. I wanted people to know what MDE was doing and draw

1 attention to it.

2 Q. What they did on June 25, 2021 was deny Safari
3 Restaurant, S & S Catering, Brava Cafe's continued
4 participation in the program, correct?

5 A. The rally had been scheduled long before that denial
6 came in, which is why it says we are doing it tomorrow. It
7 was already scheduled prior to any of that.

8 Q. And, in fact, you had been fighting with MDE for quite
9 some time at this point, correct?

10 A. We were asking MDE to follow the law.

11 Q. I know you compared yourself to a mob, correct?

12 A. With the way we attacked fraud and problem sites, yes.

13 Q. Okay. And one of the entities you attacked was MDE,
14 correct?

15 A. No.

16 Q. You said like the mob, you had to aggressively deal with
17 your problems, correct?

18 A. MDE was not a problem. They were violating the law.
19 It's a state government. They're -- like, you can't attack
20 them.

21 Q. All right. Well, you -- I want to show you now BB --
22 Government Exhibit BB32b. This is a text message exchange
23 between you and Ikram Mohamed; is that right?

24 A. Correct.

25 Q. Ikram Mohamed was a Feeding Our Future employee,

1 correct?

2 A. Consultant.

3 Q. Consultant. She worked with you at Feeding Our Future,
4 correct?

5 A. Her and some of her staff.

6 Q. Okay. And you texted with her quite regularly, correct?

7 A. Yes.

8 Q. A lot?

9 A. A fair amount.

10 Q. I mean, every day?

11 A. Generally. Probably.

12 Q. You talked to her on the phone every day?

13 A. Frequently.

14 Q. In fact, I think I saw a text message where you joked
15 that your family was saying she was like a second spouse or
16 something; is that right?

17 A. It sounds like my sense of humor. I don't recall.

18 Q. All right. So this text is on June 22nd, 2021, a couple
19 days before these appeals, correct?

20 A. Correct.

21 Q. And you are talking to Ikram Mohamed and you talk about
22 Watkins is prepped if we need to remind our friends who the
23 real fucking boss is, correct?

24 A. Correct.

25 Q. Watkins is your lawyer?

1 A. Correct.

2 Q. And who is the real fucking boss?

3 A. Feeding Our Future.

4 Q. You?

5 A. Not -- no.

6 Q. Okay. Well, let's --

7 A. I mean, I was the boss, but, no, in this context it was
8 Feeding Our Future.

9 Q. The next message you sent a couple minutes later, "I
10 don't play." Correct?

11 A. Correct, I don't. I protected that organization to the
12 best of my ability.

13 Q. Mm-hmm. And you showed them how real bosses play?

14 A. Yes.

15 Q. Everyone else was just a peasant. Is that what
16 Ms. Mohamed added?

17 A. That's what she said.

18 Q. And then on page 2 here you said, "I'll slap them with a
19 defamation lawsuit, slander my company and my team, get the
20 fuck out of here"?

21 A. Yeah.

22 Q. And you did sue someone for defamation, correct?

23 A. Eventually, yes, but that was not what was being
24 referenced in this.

25 Q. Okay. And the person you sued for defamation was an MDE

1 employee, correct?

2 A. It was based on misrepresentations he had made to the
3 media.

4 Q. Those being that he suspected there was fraud within
5 Feeding Our Future?

6 A. That's what the article said. However, investigations
7 showed --

8 Q. Ms. Bock, is that what you --

9 A. -- that he didn't have that --

10 Q. -- sued him for, defamation?

11 A. That was added to the lawsuit. He, I believe --

12 Q. Ms. Bock, I'm not asking -- I'm just asking whether
13 that's what you sued him for.

14 A. That was -- yes.

15 Q. Okay. Ms. Ikram Mohamed continues, "Just let me massage
16 their egos and apologize and then we'll see if they continue
17 with the bullshit." Correct?

18 A. That's what she said.

19 Q. And you said, "I am just loading the gun in case"?

20 A. That was a joke.

21 Q. Not a real gun. A metaphorical gun, correct?

22 A. A sarcastic, yes.

23 Q. Like a defamation lawsuit, say?

24 A. No.

25 Q. And you continue and you end this conversation, "They

1 don't really know who I am." Right?

2 A. Right.

3 Q. Meaning they don't know who they're messing with, right?

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

5 Q. I want to talk about one of the other sites that you had
6 a dispute with and you said you kicked out of the program,
7 and that's Brava Cafe. Okay?

8 Now, you testified yesterday about Brava Cafe,
9 right?

10 A. Yes.

11 Q. And Hanna Marekegn testified at this trial, correct?

12 A. She did.

13 Q. At some length, correct?

14 A. Yes.

15 Q. And she testified about her site, Brava Cafe, and her
16 company, Brava Cafe, correct?

17 A. Correct.

18 Q. Which is both a site and a vendor; is that right?

19 A. It was a site for a period of time and became a vendor.

20 Q. And in June of 2021, when MDE denied continued
21 participation in the program, you filed an appeal on Brava
22 Cafe's behalf; is that right?

23 A. All sites' appeals were filed, yes.

24 Q. Okay. Now, yesterday you talked at some length about
25 the claims that Ms. Marekegn was submitting on behalf of

1 Brava Cafe; is that right?

2 A. In relation to House of Refuge, yes.

3 Q. And if I understood your testimony correctly, you said
4 that she was claiming to have distributed 21,000 meals a
5 day, correct?

6 A. Correct.

7 Q. And you said that was a preposterous number, an absurd
8 number, correct?

9 A. 21,000 meals every single day to different participants
10 seven days a week, yes, that's hundreds of thousands of
11 people.

12 Q. Okay. Well, wouldn't it be the same 21,000 every day?

13 A. No.

14 Q. Okay.

15 A. Because she would pass out seven-day meal packets.
16 3,000 people would come on Monday and get their food for the
17 week. Tuesday 3,000 different people would purportedly come
18 and get their seven-day meal packs. And it was going on
19 seven days a week.

20 Q. Well, I'm asking because we talked a little earlier,
21 right before and after the break, about Safari Restaurant.

22 A. Yeah.

23 Q. And they -- we looked through some of invoices where
24 they purported to be distributing 20,000 meals a day,
25 correct?

1 A. For -- yes.

2 Q. And you submitted those, correct?

3 A. Based on the sites, yes.

4 Q. Okay. So it was fine for Safari, but not fine for Brava
5 Cafe, correct?

6 A. Incorrect.

7 Q. And Brava -- and Ms. Marekegn explained the nature of
8 the dispute during her testimony, correct?

9 A. She stated what she believed happened. The
10 documentation we had from Brava Cafe was that they were
11 distributing only on Wednesdays and Saturdays. So a claim
12 of 21,000 seven days a week, when we were only aware of two
13 days --

14 Q. And you --

15 A. -- was the concern.

16 Q. You met with her, correct?

17 A. I did not.

18 Q. And she --

19 A. I met with Sharon Ross.

20 Q. And she talked about these claims, correct?

21 A. I never spoke with Hanna. I handed her a Post-it with
22 our attorney's number and said she could speak to him.

23 Q. You asked her for a kickback; is that right?

24 A. That's ridiculous. No.

25 Q. I think you said yesterday that you had never heard that

1 before she testified, correct?

2 A. That she had requested a kickback --

3 Q. Yeah.

4 A. -- or that I had, supposedly? Not that I recall.

5 Q. You had never heard that before?

6 A. Not that I recall.

7 Q. Okay. I'd like to show you what's been marked, but not
8 yet admitted, as Government Exhibit Q99a.

9 And this is a complaint that Ms. Marekegn
10 submitted to MDE after your meeting with her; is that right?

11 A. I never met with her.

12 Q. Okay. But you're aware of the complaint, correct?

13 A. I was not. We do not receive these at the sponsor.

14 MR. UDOIBOK: Objection. Foundation.

15 THE COURT: Nothing has been offered yet, so let's
16 keep going with the testimony. I think -- the objection is
17 to the exhibit or to the testimony?

18 MR. UDOIBOK: To the exhibit.

19 THE COURT: All right. It hasn't been offered
20 yet.

21 So continue with your questioning.

22 MR. THOMPSON: Your Honor, I'm going to move to
23 admit Government Exhibit Q99a.

24 THE COURT: Objection to the exhibit?

25 MR. UDOIBOK: Yeah, foundation.

1 THE COURT: For foundation.

2 Mr. Thompson, can you respond, please.

3 MR. THOMPSON: Your Honor, this is a document that
4 we received from MDE --

5 MR. UDOIBOK: Objection --

6 (Simultaneous indiscernible crosstalk)

7 MR. THOMPSON: -- pursuant to subpoena.

8 THE COURT: I'm going to sustain the objection.

9 BY MR. THOMPSON:

10 Q. Isn't it true that Ms. Marekegn filed a complaint with
11 MDE about your attempt to shake her down for a kickback?

12 A. I learned later that she had. However, we had already
13 been working with MDE during the investigation of her claim.
14 We had also contacted her attorney because there had been
15 indications that she was going to file false allegations
16 against Feeding Our Future if we did not pay at least a
17 portion of her claim.

18 Q. In fact, you texted Ikram Mohamed after she made this
19 allegation, correct? She reported you to MDE and it was a
20 problem, correct?

21 A. I don't know when -- I know that it was reported to MDE.
22 I don't recall ever being made aware of it.

23 Q. I'm going to show you what's been marked, but not yet
24 admitted, as Government Exhibit BB32i, and this is an
25 excerpt of text messages between you and Ikram Mohamed on

1 August 24th, 2021.

2 MR. THOMPSON: Your Honor, I move to admit
3 Government Exhibit BB32i.

4 THE COURT: Any objection?

5 MR. UDOIBOK: No objection.

6 MR. MONTEZ: No objection.

7 THE COURT: BB32i is admitted.

8 BY MR. THOMPSON:

9 Q. Ms. Bock, again, these are messages between you and
10 Ikram Mohamed, correct?

11 A. Correct.

12 Q. A Feeding Our Future employee?

13 A. Consultant.

14 Q. Okay. Close friend?

15 A. A friend.

16 Q. And the date on this text is August 24th, 2021; is that
17 right?

18 A. Correct.

19 Q. And that's right when you and Ms. Marekegn had this
20 dispute, correct?

21 A. Incorrect.

22 Q. Incorrect?

23 A. I never met with her or had a dispute. I told -- the
24 staff informed her. I spoke to Sharon Ross and let them
25 know their claims were under investigation.

1 Q. Well, it's the same day that she submitted a complaint
2 to MDE about you; isn't that right?

3 A. It is the day after I had terminated her contract.

4 Q. And it's about -- in fact, it's about 25 minutes after
5 she submitted a complaint to -- after Ms. Marekegn submitted
6 a complaint to MDE about you, correct?

7 A. I don't know that. Like I said, I don't receive those
8 complaints. MDE is required to investigate them. They
9 wouldn't forward something like that to me.

10 Q. And she reported you for kicking her out of the program
11 for refusing to pay a kickback, correct?

12 A. We kicked her out of the program because she was
13 overbilling and the investigation, as I talked about
14 yesterday, showed her invoice was clearly fraudulent and all
15 of her backup documents were clearly fraudulent.

16 Q. So after Ms. Marekegn reported you, you texted Ikram
17 Mohamed about it, correct?

18 A. I texted Ikram Mohamed, letting her know that I was
19 providing further information to the Department of
20 Education. Because she's a vendor, the sponsor has a
21 limited oversight. And so, yes, we -- I was going to give
22 the info to MDE and ask how to proceed.

23 Q. Okay. And you texted Ikram. You said, "Tomorrow we are
24 emailing the info we have to MDE and asking how to proceed
25 since she is a vendor." Correct?

1 A. Correct.

2 Q. And you are talking about Hanna Marekegn?

3 A. Brava Cafe, yes.

4 Q. Okay. The vendor.

5 And you tell Ikram after that, "I want to put --
6 we have been told she is soliciting contracts and offering a
7 15 percent kickback to sites." Correct?

8 A. Yes, correct. I had met with Sharon Ross -- in fact,
9 there's an audio recording of it -- where I learned that
10 they were working together, and Hanna had told her she would
11 give her or her nonprofit --

12 Q. You recorded the conversation?

13 A. I did.

14 Q. Because you did that, you had a habit of recording
15 conversations with people, correct?

16 A. I recorded conversations with people that had obtained
17 attorneys and were threatening to litigate.

18 Q. And, in fact, you -- is that why you asked Ms. Marekegn
19 not to bring her phone or Apple watch into the meeting with
20 you that day?

21 A. Like I said, I have never met with Hanna.

22 Q. You were concerned about her making an audio recording
23 secretly?

24 A. Absolutely not. I didn't meet with her.

25 Q. The way you would secretly audio record meetings with

1 people?

2 A. It wasn't a secret. People knew I did it. Not
3 everyone, but it was not hidden.

4 Q. I mean, it was a secret. They didn't know you were
5 doing it. They may have heard your reputation for doing it,
6 correct?

7 A. They may have.

8 Q. You weren't saying, Hey, I'm going to record this
9 meeting, correct?

10 A. No, because it was an investigation and I was trying to
11 get to the truth of the matter and have a conversation to
12 see what information I could receive.

13 Q. Understood.

14 All right. And you say, "But we don't have reason
15 to believe House of Refuge is involved." Correct?

16 A. Correct.

17 Q. You wanted to keep House of Refuge as a site under the
18 sponsorship of Feeding Our Future, correct?

19 A. I did not. I just was -- this was early into the
20 investigation and we weren't sure how involved House of
21 Refuge was.

22 Q. And then you continue. You wanted to "blow their shit
23 up." Correct?

24 A. I absolutely wanted the government -- that's why I
25 reported it to MDE and the Attorney General's Office.

1 Q. Ms. Bock, I'm just asking you what the text message
2 says. Okay?

3 It says, "Blow their shit up." Correct?

4 A. Expose their fraud, yes.

5 Q. And then you say, "I'm stupid excited right now. Karma
6 is so fucking great."

7 A. Yes, I'm excited that we are able to stop what was
8 clearly a large amount of fraud.

9 Q. And then you go on to talk about Hanna recruiting
10 people, correct?

11 A. Correct.

12 Q. And a guy named OJ?

13 A. Omar Jamal.

14 Q. Okay. And he's a guy who was working with Hanna
15 Marekegn, correct?

16 A. My understanding is he was working with House of Refuge.

17 Q. In fact, you had paid him a consulting fee at some
18 point, correct?

19 A. We terminated him because he overbilled. He was brought
20 on as a consultant. After the first month, his invoice was
21 ridiculous. So we paid a portion of it and terminated him.

22 Q. Were you paying him to recruit sites for you?

23 A. Absolutely not.

24 Q. Just like you say that -- you've referred to Hanna
25 trying to recruit, or Omar Jamal?

1 A. She was trying to recruit people to pressure me to pay a
2 portion of the claim.

3 Q. You say, "We need names so we can shut them down."
4 Correct?

5 A. To stop it, absolutely. I don't want somebody that's
6 going to come in and pressure a fraudulent claim be paid.

7 Q. And, Ms. Bock, this is on August 24th, 2021, correct?

8 A. Correct, the day she was terminated, or maybe the day
9 after.

10 Q. You continued your conversation that day with Ikram
11 Mohamed in what's been admitted as BB32g, and I'll show it
12 to you in a second, but you talk about -- you referred to
13 Salim Said, correct?

14 A. I don't know.

15 Q. And you express concern that he has shit to take you
16 down; is that right?

17 A. (No response.)

18 Q. I'll show you on the screen. This is Government
19 Exhibit BB32g. More text messages between you and Ikram
20 Mohamed that same evening on August 24th, 2021; is that
21 right?

22 A. Correct.

23 Q. And you write to Ikram Mohamed -- you refer to Blackie,
24 and that's Salim Said's nickname, correct?

25 A. Correct.

1 Q. That's what he was most commonly referred to?

2 A. I would say.

3 Q. "Also Blackie hates white people and has shit to take me
4 down." Correct?

5 A. That is what --

6 Q. That's what it says?

7 A. That's what Empress had told me.

8 Q. That's what you wrote, correct?

9 A. I was telling her what I had been told by him.

10 Q. And this is -- just to be clear, this is in the context
11 of a conversation about kickback allegations, correct?

12 A. No, not that I know of. No, this wasn't. This was
13 honestly complaining about the man I was dating.

14 Q. And this says, "The entire community is going to hang up
15 on me to take me down." Correct?

16 A. Yes. Again, that's what Empress had told me.

17 Q. All right.

18 A. And I believe she responds, "What? Is that what Malcolm
19 told you? That was also what he was known as."

20 Q. Is that what he told Malcolm?

21 A. That's what was being claimed, yes.

22 Q. Blackie told Malcolm that he hates white people and has
23 shit to take you down?

24 A. That's what Empress claimed, although he was a -- he has
25 some problems.

1 Q. And this, again, is in the context of a conversation
2 about Hanna Marekegn making allegations against you for
3 soliciting a kickback, correct?

4 A. No, it's not in that context.

5 Q. All right.

6 MR. THOMPSON: Your Honor, this is probably a
7 decent time for a break. We're due.

8 THE COURT: All right. We'll come back at 3:20.

9 All rise for the jury.

10 3:04 p.m.

11 **IN OPEN COURT**

12 **(JURY NOT PRESENT)**

13 THE COURT: We're in recess until 3:20.

14 (Recess taken at 3:04 p.m. till 3:23 p.m.)

15 3:23 p.m.

16 **IN OPEN COURT**

17 **(JURY PRESENT)**

18 THE COURT: You may all be seated.

19 Mr. Thompson, you may continue.

20 MR. THOMPSON: Thank you, Your Honor.

21 BY MR. THOMPSON:

22 Q. Ms. Bock, I want to change gears here and ask you about
23 one of the sites that was operated by Feeding Our Future
24 that the jury has heard testimony about. Okay?

25 A. Okay.

1 Q. And that's a site that was first applied for under the
2 name SIR Boxing and later Arcade; is that right?

3 A. It is.

4 Q. And that was a Feeding-Our-Future-operated site,
5 correct?

6 A. Feeding Our Future staff or volunteers and site staff
7 trained by Feeding Our Future.

8 Q. Okay. It was a Feeding Our Future site, correct?

9 A. It was sponsored by Feeding Our Future.

10 Q. Okay. It was run by Feeding Our Future, no?

11 A. I believe there were some staff there.

12 Q. Okay. It wasn't run by SIR Boxing, correct?

13 A. No. As I said, SIR Boxing never started. It was
14 initial conversations and --

15 Q. Okay. And the site was called -- then later changed to
16 Feeding Our Future -- it was Feeding Our Future SIR Boxing
17 and then Feeding Our Future Arcade, correct?

18 A. I don't know why it would ever be Feeding Our Future SIR
19 Boxing.

20 Q. I'm going to put up on the screen Government
21 Exhibit A75, which we've seen at some length.

22 It's an email that you sent to MDE on October 4th,
23 2021; is that right?

24 A. Correct.

25 Q. And it's a clarification about the site located either

1 at SIR Boxing or the Arcade strip mall on the east side of
2 St. Paul, correct?

3 A. Correct.

4 Q. And there was -- just to be clear, there was never a
5 site at SIR Boxing, correct?

6 A. There was an application submitted, but never a site
7 that operated.

8 Q. No kids were getting food there, correct?

9 A. Correct.

10 Q. And then you changed the name to Feeding Our Future
11 Arcade; is that right?

12 A. Yes.

13 Q. And you say here, "When the SFSP application was
14 submitted, we utilized the guidance we had been provided at
15 the time, which was to mark it as a for-profit and MDE would
16 change it to nonprofit. SIR Boxing never started with
17 Feeding Our Future. There is a different nonprofit that is
18 operating in the multi-unit building at this time."

19 Correct?

20 A. Correct.

21 Q. Now, all the paperwork I see lists it as Feeding Our
22 Future Arcade; is that right?

23 A. Yes.

24 Q. That's what you told MDE that you wanted to change its
25 name to, correct?

1 A. Yes. We had asked them twice to change the name.

2 Q. So the nonprofit being Feeding Our Future, correct?

3 A. Not always, but yes in this case.

4 Q. In this case.

5 Okay. I want to talk to you -- because the meal
6 counts for this SIR Boxing Arcade site were quite high,
7 correct?

8 A. I don't know what they were.

9 Q. 2,500 a day?

10 A. That is possible.

11 Q. Okay. You approved those claims, correct?

12 A. The claims, like I've said, are reviewed by multiple
13 departments within Feeding Our Future and run through the
14 software and then, yes, I print a report and enter the data.

15 Q. I'm showing you what's been admitted as Government
16 Exhibit P7, another one of the folders found at Feeding Our
17 Future, correct?

18 A. Yes.

19 Q. Your handwriting at the top there?

20 A. No, not --

21 Q. And these are the meal counts for July of 2021; is that
22 right?

23 A. Correct.

24 Q. At SIR Boxing?

25 A. No.

1 Q. At Arcade?

2 A. Yes, in a different location.

3 Q. In the same little strip mall we looked at earlier in
4 the trial?

5 A. They were not all distributed from there. There was a
6 lot of home deliveries for this particular site. It was
7 also one-day-a-week operation. But, yes, 2,500 was what was
8 contributed to that location.

9 Q. Each week?

10 A. Yes. Like I said, it was a one-day-a-week, and most
11 locations would stay open until the food was gone and/or
12 delivered to --

13 Q. There was a vendor, Ms. Bock?

14 A. There would be.

15 Q. Okay. Directing your attention to P8, here's the August
16 claims. Same thing, 2,500 a week, correct?

17 A. Correct.

18 Q. A lot of meals?

19 A. A lot.

20 Q. Breakfast and lunch?

21 A. Yes.

22 Q. Essentially 5,000 meals a day, correct?

23 A. If you add them together.

24 Q. That's what you do when you submit them in CLiCS,
25 correct?

1 A. No. They are submitted as separate.

2 Q. And you submitted those claims?

3 A. I believe so.

4 Q. And you cut the checks, correct?

5 A. I issued the reimbursement payments.

6 Q. And here this -- there was a vendor for this site,
7 correct?

8 A. Correct.

9 Q. And it was a vendor called Star Distribution; is that
10 right?

11 A. Yes.

12 Q. You are familiar with Star Distribution?

13 A. I am.

14 Q. That company belongs to Ikram Mohamed, correct?

15 A. No. It belongs to a family member, is my understanding.

16 Q. But it's -- she and her family run it; is that right?

17 A. I don't know exactly what role she played in it, but I
18 know that, yes, it is --

19 Q. Okay.

20 A. -- in her family.

21 Q. You -- and so she, Ikram Mohamed, is your friend,
22 correct?

23 A. You can say that.

24 Q. Feeding Our Future employee?

25 A. Consultant.

1 Q. Got paid by Feeding Our Future, correct?

2 A. The consultation company was.

3 Q. Okay. To work there?

4 A. Her and her staff.

5 Q. With you as part of the Federal Child Nutrition Program,
6 correct?

7 A. Yes.

8 Q. Okay. And she was the vendor for Arcade, correct?

9 A. She was not. Star Distribution was.

10 Q. Okay. And, in fact, if we look here at Government
11 Exhibit P13, another file recovered from Feeding Our Future,
12 we see the invoice from Star Distribution, correct?

13 A. Correct.

14 Q. For the meals purportedly distributed at the Arcade
15 site?

16 A. Correct.

17 Q. 2,500 breakfast and lunch every day --

18 A. Yes.

19 Q. -- correct?

20 By your friend and Feeding Our Future consultant,
21 Ikram Mohamed, correct?

22 A. Not by her, no.

23 Q. By her entity?

24 A. It's not hers.

25 Q. Well, let's talk about that. In fact, you and

1 Ms. Mohamed texted about this company, correct?

2 A. I believe so.

3 Q. And here on August 13th of 2021, you asked her, "Who do
4 you want your checks written to?" Correct?

5 A. That's what it says.

6 Q. And she responded, "Star Distribution." Correct?

7 A. Correct.

8 Q. You asked her, "Who do you want your checks written to?"
9 and she says, "Star Distribution." Correct?

10 A. "Your" referencing your family.

11 Q. But you said "your."

12 And then you wrote her a check that day, correct?

13 I'm going to show you on the screen, if I can find it
14 here -- you wrote her a check August 13th, 2021, for
15 \$476,000; is that right?

16 A. I did not write her a check.

17 Q. You didn't?

18 A. Not to her.

19 Q. To Star Distribution?

20 A. If that was what the reimbursement amount was.

21 Q. Her company?

22 A. Not her company.

23 Q. Just the one you called her company in the text message?

24 A. The one I referenced because I knew it was a family
25 affiliate.

1 Q. And, in fact, you paid her -- Ikram's company, her
2 family's company nearly \$5 million, is that right, directly
3 from Feeding Our Future; is that right? I'm showing you
4 Government Exhibit X56.

5 A. Yes. It looks like 4.9.

6 Q. To your Feeding Our Future consultant?

7 A. No. To a distribution company.

8 Q. Owned by her family?

9 A. Correct.

10 Q. Okay. And you thought that was okay?

11 A. It is. The sites were monitored, the vendor was
12 monitored by other staff.

13 Q. Okay. Because earlier you had expressed outrage about
14 Hadith Ahmed. Is it true that -- actually, many Feeding Our
15 Future employees had sites and self-dealing, correct?

16 A. Not sites, no. They did have businesses. Eidleh I did
17 not know until the search warrants were executed. Hadith I
18 knew was affiliated with Southwest. Ikram did not have a
19 site. Like I said, family members of her did.

20 Q. Yeah. They had an array of sites, correct?

21 A. They had a few.

22 Q. Like six or something?

23 A. Could be.

24 Q. And Star Distribution was the vendor for each of those
25 sites?

1 A. I believe so.

2 Q. Okay. So your close friend and Feeding Our Future
3 consultant enrolled in the program, correct?

4 A. Yes.

5 Q. You enrolled her in the program?

6 A. No, I didn't enroll her. I enrolled whatever sites
7 were --

8 Q. Her family's companies, correct?

9 A. They were her family's.

10 Q. And then you had her vend for those companies, correct?

11 A. I did not have her vend. Sites are allowed to select
12 their own vendors.

13 Q. You signed the checks?

14 A. As I've said, I was the only signatory on the account,
15 so, yes, I signed all the checks.

16 Q. And when you weren't sure where the checks should go,
17 you asked her, correct?

18 A. I asked for clarification.

19 Q. Okay. Hadith Ahmed also had a site?

20 A. He did.

21 Q. Southwest Metro Youth; is that right?

22 A. Yes.

23 Q. You knew about that, correct?

24 A. I learned of it.

25 Q. You knew about it and you still paid for it, correct?

1 A. For a period.

2 Q. Okay. So it's not like you were outraged by his
3 behavior and you kicked him out. You knew he was dealing
4 and involved in the program, correct?

5 A. I knew that he was affiliated with that site.

6 Q. Okay.

7 A. I learned of it.

8 Q. Despite the fact that he was a site supervisor for you?

9 A. He was.

10 Q. Okay.

11 A. Other staff were assigned to that site.

12 Q. Okay. So all your site supervisors had skin in the
13 game, so to speak, correct?

14 A. No. There was eight to ten site support staff.

15 Q. Hadith did, though?

16 A. Hadith was a consultant and so, yes, he was affiliated.
17 I did not know that at the initial time, but I did learn of
18 it relatively quickly after.

19 Q. And then you continued to allow him to have a site in
20 the program, correct?

21 A. There's -- legally I can't terminate because he's a
22 consultant for Feeding Our Future. So his claims were
23 reviewed, his site was monitored; and if everything was
24 approved and checked out, the claim would be paid.

25 Q. Because his sites were definitely fraudulent, though,

1 correct, and you were aware of that?

2 A. Of course not.

3 Q. You are aware of that sitting here today, aren't you?

4 A. Yes, I know that now.

5 Q. All right. Okay. Let's talk about kickbacks. We
6 looked at that text message before the break where there was
7 talk of -- you and Ikram were talking about kickbacks and
8 Hanna Marekegn, correct?

9 A. That she was going to give a kickback to the site if
10 they submitted the meal counts, yes.

11 Q. Okay. And later in that conversation you talked about
12 Blackie having shit to take you down, correct?

13 A. I said that's what Empress had told me.

14 Q. Okay. So in August of 2021, that same time frame,
15 Safari, Mr. Salim Said's business and site, paid you
16 \$310,000; isn't that right?

17 A. They purchased a child care center.

18 Q. They gave you a check for \$310,000? Yes or no. We'll
19 get to the details, I promise.

20 A. Yes.

21 Q. They wrote that check to you personally, correct?

22 A. Correct.

23 Q. And they were at the time doing business under Feeding
24 Our Future, correct?

25 A. Safari was.

1 Q. Safari was, okay.

2 In fact, you had paid them -- over the course of
3 18 months, you paid them like \$12 million, correct?

4 A. That's -- yes.

5 Q. Now, I know you've said that you sold them a daycare,
6 correct?

7 A. Correct.

8 Q. And that they were interested -- Salim Said was
9 interested in opening a daycare, correct?

10 A. Correct.

11 Q. But there was no daycare, was there?

12 A. Incorrect.

13 Q. There was no kids?

14 A. It was not licensed.

15 Q. Let me define daycare like this. Did it have a daycare
16 license?

17 A. No.

18 Q. Okay. Were there kids?

19 A. Not enrolled.

20 Q. Were there parents, customers?

21 A. No. It was not open.

22 Q. Okay. So there wasn't a daycare.

23 You didn't own the building --

24 A. No.

25 Q. -- correct?

1 Okay. So no license, no customer, no operational
2 daycare, correct?

3 A. No daycare can be sold with a license. They're closed
4 when there's a sale.

5 Q. Well, there wasn't a -- there hadn't been a license
6 anyway, correct?

7 A. No.

8 Q. Ms. --

9 A. I had indicated I was intending to sell the center.

10 Q. Okay. And when you say "the center," you don't mean the
11 building, you mean the goodwill of this nonexistent,
12 nonoperational, unlicensed daycare? Is that what you mean?

13 A. It was not nonexistent. It was unlicensed and not
14 providing care, but it did have all of the approved space,
15 all of the approved equipment, materials, curriculum,
16 everything necessary.

17 Q. It had some toys and some IKEA furniture, if I
18 understand the pictures correctly?

19 A. There was some IKEA furniture.

20 Q. Okay. But what was there -- because there was a
21 business operating at Southcross, correct? And that's what
22 we're talking about here.

23 A. There was food distribution.

24 Q. Yes. It was a food site, correct?

25 A. Correct.

1 Q. So for all this talk of a daycare that had no kids, no
2 revenue, no employees, no nothing, there was a food site
3 that did big money, correct?

4 A. I don't recall the exact amounts, but, yes, it was a
5 food site. The number of meals distributed, I believe,
6 varied.

7 Q. There was a lot, though? You know because you signed
8 the meal counts at one point, correct?

9 A. During the time Feeding Our Future operated it.

10 Q. And, in fact, back in that time frame, in December of
11 2021, there was 1,100 a day, correct?

12 A. One day a week.

13 Q. And you signed those meal counts, correct?

14 A. Yes, as I said.

15 Q. Okay. And that site continued to be operational
16 throughout -- into 2021, correct?

17 A. Into 2021 there were -- it was not operational for two
18 months.

19 Q. Okay. But generally it was -- by August it was
20 operational, correct?

21 A. It was reopened, yes.

22 Q. August of 2021?

23 A. Yes.

24 Q. Okay. And so the time you got \$310,000 from Salim Said
25 and his partners, there was no daycare, but there was a food

1 site, correct?

2 A. There was all of the necessary equipment for a daycare
3 and, yes, there was food being distributed from the
4 location.

5 Q. I want to talk about what was actually happening, not
6 the toys. Okay? Just bear with me. Okay?

7 A. Okay.

8 Q. Let's talk about what was actually happening there --

9 A. Okay.

10 Q. -- or was being built.

11 There was revenue being generated, correct?

12 A. It was a food site.

13 Q. Okay. And when you sold, quote, unquote, that daycare,
14 what you actually sold was the food site, correct?

15 A. Correct.

16 Q. Correct?

17 A. No.

18 Q. After you did that, after you sold the daycare, Safari
19 took over that food site; isn't that right?

20 A. They purchased the child care center, so, yes, the lease
21 was then under them.

22 Q. And the food site, correct?

23 A. They operated it as a food site.

24 Q. So they got to continue to bill, under the sponsorship
25 of Feeding Our Future, the Southcross site, correct?

1 A. Yes, they were the occupants of the space, so they could
2 use it as they chose.

3 Q. Well, and they didn't do it as a daycare, correct?

4 A. Not --

5 Q. Ms. Bock, let's not pretend that there was a daycare.
6 They didn't start a daycare, correct?

7 A. Not at that time, no.

8 Q. They billed the food program, though, for meals
9 purportedly distributed at Southcross, correct?

10 A. For a short time, although the pandemic waivers were
11 coming to an end, so it was being -- my understanding is it
12 was being transitioned into some sort of programming.

13 Q. That definitely didn't happen, did it?

14 A. Well, no, because the search warrant was executed, but
15 we were in the process of transitioning.

16 Q. Okay. Would have happened but for the search warrant;
17 is that what you are saying?

18 A. Well, legally once the waivers end, yes, that's --

19 Q. Is that what you are saying?

20 A. The children have to eat on site, so yes.

21 Q. Ms. Bock, you have to answer the -- this is going to
22 take forever if you don't --

23 MR. UDOIBOK: Objection.

24 Q. -- answer the questions that I ask.

25 THE COURT: Can you rephrase?

1 BY MR. THOMPSON:

2 Q. There was never a daycare operated at 1506 Southcross,
3 true?

4 A. True.

5 Q. That was true starting -- that was true in 2019,
6 correct?

7 A. Correct.

8 Q. 2020?

9 A. Correct.

10 Q. 2021?

11 A. Correct.

12 Q. 2022?

13 A. Well, no. The --

14 Q. No daycare?

15 A. No licensed child care.

16 Q. That's generally what people talk about when they say a
17 daycare. Kids there getting cared for, that never happened?

18 A. No.

19 Q. Okay. All right. So in August of 2021 the Safari
20 gentlemen cut you a check for \$310,000, correct?

21 A. Correct.

22 Q. At the time they were the single largest participants in
23 the program under the sponsorship of Feeding Our Future,
24 correct?

25 A. I don't know if they were at the time.

1 Q. You had submitted more claims on behalf of that group
2 than any other, correct?

3 A. Cumulative, yes, I believe so.

4 Q. They had sites located all around the state of
5 Minnesota, correct?

6 A. Like I said, I knew there was an affiliation. I didn't
7 know if they were their sites or not.

8 Q. Is that a yes?

9 A. It's an I don't know --

10 Q. Okay.

11 A. -- that they were their sites. I knew there was
12 relationships. I know there was an affiliation. I didn't
13 know if it was --

14 Q. Ms. Bock, we've heard your explanation. What I mean by
15 that is, when you had a check for those sites, you texted
16 Salim Said to tell him, correct?

17 A. On a couple of occasions.

18 Q. That's what I mean. Okay?

19 All right. You were paying millions of dollars a
20 month to them, correct?

21 A. Yes. They were being reimbursed for it.

22 Q. Okay. And then you cut them this check for \$310,000 --
23 or they cut you a check for \$310,000?

24 A. They purchased the center, yes.

25 Q. Now, I want to talk about where that money came from.

1 A. Okay.

2 Q. Okay? And before I do, I want to just make clear, you
3 kept a spreadsheet on your laptop of all the payments and
4 where they were directed to, correct?

5 A. Yes, we were required to because, like I said, it's not
6 a straight 10 percent, so we had to calculate out their
7 payments.

8 Q. Ms. Bock, I'm not asking about the regulatory
9 requirements. Mr. Udoibok can ask you about those.

10 I'm asking you a simple question. Did you keep a
11 spreadsheet of all the payments of Federal Child Nutrition
12 Program funds that you paid out?

13 A. Yes.

14 Q. You kept that on your personal laptop, correct?

15 A. It was in Dropbox, which was shared.

16 Q. Okay. It was password-protected?

17 A. Of course. It's financial records.

18 Q. And Government Exhibit BB53b is one of these
19 password-protected sheets, correct?

20 A. Correct.

21 Q. You see on the first page here there's the title of the
22 document, Fiscal Year '21 Payment Distribution, correct?

23 A. Correct.

24 Q. And the password is 1729CCBOCK\$, correct?

25 A. Correct.

1 Q. That's your last name?

2 A. It is.

3 Q. Your password?

4 A. Yes. It was a spreadsheet that I used.

5 Q. Okay. And you used it to keep track of all the payments
6 that you paid out, correct?

7 A. I used it to track how the reimbursements were split.

8 Q. Because you split them in all sorts of ways; is that
9 right?

10 A. The reimbursement payment is based on cash and then some
11 other pieces of it, so it's not a straight 10 percent. So,
12 yes, we had to calculate out the reimbursement for the site
13 or vendor.

14 Q. And directing you to page -- your attention to page 31
15 of this, this is an excerpt of the spreadsheet, correct?

16 A. Correct.

17 Q. And it shows the different sites, correct?

18 A. Correct, the name of the sites --

19 Q. And --

20 A. -- that was in CLiCS.

21 Q. And the site ID, correct?

22 A. Correct.

23 Q. And the amount of money getting paid in different dates
24 and times, correct?

25 A. This would have been for one particular payment.

1 Q. Yep. So these are -- each individual payment gets its
2 own line on the spreadsheet, correct?

3 A. Yes, because we have to calculate it out by site.

4 Q. These documents are lengthy?

5 A. Some of them.

6 Q. I want to direct your attention here. If we look,
7 there's a series of payments to Cosmopolitan Business
8 Solutions and Star Distribution on August 13th --
9 August 12th, 2021; is that right?

10 A. Yes.

11 Q. Okay. First off, there's a payment in one of them -- I
12 mean, there's a series of them to Cosmopolitan. That's
13 Safari Restaurant, correct?

14 A. Yes.

15 Q. They are all August 12th?

16 A. Yeah. It's the summer program, so payments were made
17 direct to vendors.

18 Q. So the Brava Restaurant, they're getting \$380,000 on
19 August 12th, correct?

20 A. Correct.

21 Q. And Feeding Our Future was keeping \$31,000 for its
22 administrative fee?

23 A. Correct.

24 Q. The next one, \$380,000 for Stigma-Free, Willmar to
25 Safari Restaurant?

- 1 A. Correct.
- 2 Q. Your organization kept \$38,000 as an administrative fee?
- 3 A. Yes.
- 4 Q. \$380,000 for Stigma-Free, Mankato site, correct?
- 5 A. Correct.
- 6 Q. To Cosmopolitan Business Solutions?
- 7 A. Yes.
- 8 Q. Then ASA Limited, correct?
- 9 A. Correct.
- 10 Q. Olive Management?
- 11 A. Correct.
- 12 Q. Those are all the sites run by -- or that were vended
13 for by Safari Restaurant; is that right?
- 14 A. Yes.
- 15 Q. But then there's one more payment to them that day, to
16 Cosmopolitan Business Solutions; is that right?
- 17 A. Correct.
- 18 Q. And that's for the SIR Boxing Club site?
- 19 A. That was the name that was in CLiCS.
- 20 Q. Yeah. That's Arcade?
- 21 A. Correct.
- 22 Q. Okay. Now, Safari wasn't the vendor for that site, were
23 they?
- 24 A. I believe they were for that month.
- 25 Q. We just -- well, we can look at this, because I --

1 pretty sure we just looked at it and it was Star
2 Distribution.

3 But there was a payment, \$476,000, correct?

4 A. Correct.

5 Q. Being paid for claims submitted on behalf of that SIR
6 Boxing Club site?

7 A. Correct.

8 Q. And paid to Cosmopolitan Business Solutions on
9 August 12th, 2021; is that right?

10 A. That's correct.

11 Q. And these are your notes on the right directing the
12 payments, correct?

13 A. Correct.

14 Q. Now, Safari didn't run that site, did they?

15 A. I believe they were the vendor for that month.

16 Q. In fact, there's no invoice anywhere from Safari
17 Restaurant for meals distributed purportedly at the SIR
18 Boxing site or the Arcade site, correct?

19 A. I don't know.

20 Q. Not a single one anywhere?

21 A. I don't know.

22 Q. Let me show you now where that check went. Because you
23 wrote that check, correct?

24 A. Yes.

25 Q. To Cosmopolitan Business Solutions on August 12th, 2021?

1 A. That's -- yes.

2 Q. And I'm going to direct your attention here to
3 Government Exhibit W8 at page 91, which is the check that
4 you wrote that day to Cosmopolitan Business Solutions; is
5 that right?

6 A. Yes.

7 Q. August 12th, 2021?

8 A. Correct.

9 Q. For meals purportedly distributed at the Feeding Our
10 Future SIR Boxing Club or Arcade site?

11 A. For meals that the claim staff coordinators and others
12 had reviewed and approved.

13 Q. Based on your spreadsheet, though, you've directed this
14 money to Cosmopolitan Business Solutions?

15 A. Correct. That's who I was informed was vending that
16 site.

17 Q. Who informed you of that, Ms. Bock?

18 A. One of the staff members.

19 Q. Okay. I'm going to put that on the left-hand side of
20 the screen, and I'm going to put on the right-hand side of
21 the screen that -- from that same exhibit, W8, page 664,
22 which is a cashier's check purchased from that same account
23 written to you the following day, August 13th, 2021.

24 A. There is a check to me. I don't know if it's from the
25 same account.

1 Q. I'm telling you it's both Government Exhibit W8.

2 A. Okay. Then yes.

3 Q. And, in fact, we can -- so on August 12th you direct
4 Feeding Our Future -- or you write a check from Feeding Our
5 Future to Cosmopolitan Business Solutions for \$476,000,
6 correct?

7 A. Yes. As I've said, reimbursements have to be issued
8 within five days, so --

9 Q. And that was for, well, according to your
10 password-protected spreadsheet that was found in your
11 bedroom, the Arcade site?

12 A. Yes.

13 Q. But there's no invoice to that effect anywhere?

14 A. I don't know that.

15 Q. And they weren't a vendor for Arcade?

16 A. I was informed they were.

17 Q. Okay. But there's nothing in the file to say that?

18 A. I would not be surprised, with all of the paperwork, if
19 information was missing from some files.

20 Q. Well, then how would you know to pay the money to
21 Safari?

22 A. Because I had been informed that that's who the check
23 went to. If I had written it to the wrong person, I
24 definitely would have received calls and emails from
25 somebody looking for \$476,000.

1 Q. And instead of receiving a call or email from someone,
2 you received a check from Cosmopolitan Business Solutions
3 the next day for \$310,000, correct?

4 A. It was not instead of phone calls. I did sell the
5 center and received the payment the next day.

6 Q. So you paid them \$476,000 in Federal Child Nutrition
7 Program funds. The next day they pay you \$310,000 for a
8 nonoperational daycare with no customers, no children, no
9 license, no real estate, correct? Is that what happened?

10 A. I did not pay them. They were reimbursed for meals that
11 had been distributed. And based on the timing, yes, that
12 check was written the day before. However, the child care
13 center, even without a license, based on my reputation,
14 knowledge and agreement to help open the center, get it
15 licensed, staffed and children enrolled, the research that I
16 did, my understanding was that this was a fair market price.

17 Q. Based on your research?

18 A. Correct. I reviewed multiple sales agreements. I
19 reviewed --

20 Q. These are the ones with -- that own commercial buildings
21 that were included in the purchase price; is that right?

22 A. Incorrect.

23 Q. Okay. And, of course, Salim Said never opened a
24 daycare --

25 A. That's my understanding.

1 Q. -- correct?

2 A. I don't have control of what they did with the space
3 once I sold it.

4 Q. What they did do was continue to run a food site there
5 under the sponsorship of Feeding Our Future, correct?

6 A. There was a food site, yes.

7 Q. Okay. And let's talk about that. Because this was in
8 August -- August 13th of 2021, correct?

9 A. Correct.

10 Q. It was operational that month, the Southcross site?

11 A. I believe so.

12 Q. This is the site that was in this nonoperational
13 daycare, correct?

14 A. It was at 1506 Southcross.

15 Q. And I'm going to show you what's been admitted as
16 Government Exhibit P21, which is an email that you received
17 from Mr. Eidleh a couple weeks later, September 3rd, 2021;
18 is that right?

19 A. Correct.

20 Q. And this is -- the subject line is "Southcross
21 Burnsville August and September Claims" --

22 A. Yes.

23 Q. -- correct?

24 A. Correct.

25 Q. And attached to it are meal counts and invoices for the

1 Southcross site in August of 2021, correct?

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

3 Q. Same month that you sold it to the Safari crew?

4 A. Yes.

5 Q. And what I see here, directing your attention to page 3,
6 is this Southcross site. Again, the email
7 aimee@feedingourfuture, correct?

8 A. Yes. That would be an outdated form.

9 Q. And this is September 2021, correct?

10 A. Correct.

11 Q. And the meal counts are 1,700 and some a day, correct?

12 A. Yes.

13 Q. And the supervisor is Suad Muse. Do you know who that
14 is?

15 A. I don't.

16 Q. That's Mr. Eidleh's wife, correct?

17 A. I did not know that.

18 Q. And they go up to 1,900 a day, correct --

19 A. Yeah, they do.

20 Q. -- in August 2021?

21 Pretty lucrative site?

22 A. No.

23 Q. Well, let's take a look. There's an invoice from the
24 purported meal vendor, correct?

25 A. Correct.

1 Q. And it's a meal vendor called Hope Suppliers?

2 A. That's what it says.

3 Q. That's owned by Mr. Eidleh, correct?

4 A. I learned that the day the search warrant was executed.
5 I did not have a clue that he had any other businesses than
6 a consulting business.

7 Q. You didn't know that?

8 A. I did not.

9 Q. Okay. This Hope Suppliers, Columbus, Ohio, that's an
10 odd invoice, I suppose, to be serving meals in Burnsville,
11 Minnesota, correct?

12 A. Not necessarily. Sometimes the addresses are out of
13 state if it's the registered location or an office. It
14 doesn't mean that they didn't have a location or warehouse
15 or something in Minnesota.

16 Q. Okay. And if I go through here, every invoice is for
17 Hope Suppliers, Mr. Eidleh's company, correct?

18 A. It turns out.

19 Q. Now, it's a little weird because you guys were
20 sponsoring the Southcross site, right?

21 A. Yes.

22 Q. And they were purporting to serve meals to 1,900 kids a
23 day?

24 A. At that time.

25 Q. And that was a site that you had leased personally for

1 your nonoperational daycare, correct?

2 A. Correct.

3 Q. So -- and then you were selling it. So I assume you
4 would have had to reach out to the people running the food
5 site to tell them that I've not sold this property, you are
6 not going to be able to operate there, correct?

7 A. They were informed. I did not tell them.

8 Q. They were informed. Who is "they"?

9 A. The site.

10 Q. Eidleh?

11 A. I don't know who was told. I -- like I said, I did not
12 tell them.

13 Q. You're the one that sold the site?

14 A. Right.

15 Q. You were essentially the landlord, right?

16 A. This site was put in there only to end summer. We
17 weren't sure what was going to happen with it in the fall.
18 That's why -- through September 5th, that was the end of the
19 summer program.

20 Q. But you sold it on August 13th and these claims go into
21 September. So I assume you called them up and said, Hey, by
22 the way, guys, I no longer run this site. If you want to
23 keep distributing food here, you're going to have to talk to
24 Salim Said and Abdulkadir Salah because they own it now,
25 they have the lease.

1 A. My understanding was that they had gone and spoken with
2 him and informed him of that because they were now running
3 the site. So it was their agreement to negotiate, not mine.

4 Q. Okay. You don't know. All you know is Hope Suppliers
5 was the vendor and that you got paid \$310,000, correct?

6 A. I know that I sold a business and received a payment of
7 \$310,000.

8 Q. And then continued to sponsor them as they ran that food
9 site there out of your nonoperational daycare?

10 A. The site continued to be sponsored by Feeding Our
11 Future. However, I did not oversee it or review their
12 claims.

13 Q. But, Ms. Bock, I don't understand because you are
14 telling me you had a non -- this nonoperational daycare out
15 of a site that had a lease there, correct?

16 A. Correct.

17 Q. And so I assume you had some oversight or involvement in
18 the food site that was operating out of this daycare that
19 had so much value that you sold it for \$310,000. No?

20 A. I don't know what you mean by "oversight."

21 Q. You didn't have any involvement? You act like you don't
22 have anything to do with it.

23 A. I didn't. Once people moved into the space, they
24 operated it. I did not go there very frequently at all.

25 Q. You just sold it?

1 A. I went there, cleaned it up. There had been some damage
2 done, so that was repaired and then, yes, it was sold.

3 Q. And at the time it was being operated by Eidleh and
4 supplied by his fake food vendor company, correct?

5 A. I did not know he was operating it. I did not know Suad
6 Muse was his wife until you just told me right now. Hope
7 Suppliers, like I said, I had no idea was his company until
8 the search warrants were executed and it was listed in
9 there.

10 Q. Okay.

11 A. And it made me very angry.

12 Q. Okay. Now, Ms. Bock, I want to ask you about the
13 Minnesota Department of Education. Okay?

14 A. Okay.

15 Q. Because you had a lot of harsh things to say about them
16 during your direct examination; is that right?

17 A. I said that they were not as helpful as I would have
18 expected them to be, and I was disappointed that when I
19 presented them with clear evidence of fraud, they moved them
20 to a new sponsor to continue.

21 Q. So that's a yes?

22 A. I didn't -- I was --

23 Q. Ms. Bock, you have to answer the questions that I ask.
24 Okay? Your attorney will have an opportunity to ask you
25 more.

1 A. I'm answering you.

2 Q. Is that a yes or a no?

3 A. I did not have harsh words to say for them. I was upset
4 at their unwillingness to follow the regulations.

5 Q. You've had harsh things to say about them over the
6 years, you would agree?

7 A. I have said things, yes.

8 Q. And you said on direct that essentially all of this was
9 MDE's fault, is sort of the implication I took, correct?

10 A. Not at all. I said they helped make it significantly
11 worse. It's difficult when you report fraud to two
12 government agencies and it's disregarded, no investigation
13 completed and they moved to continue --

14 Q. In fact, MDE routinely tried to stop and slow down MDE's
15 [sic] opening of new sites under its sponsorship, correct?

16 A. No.

17 Q. They were constantly trying to stop you, to slow you
18 down, correct?

19 A. They're the government. If they wanted to stop, they --

20 Q. In October --

21 A. -- would have stopped.

22 Q. Well, let's talk about that. In October of 2020 they
23 tried to stop for-profit restaurants from opening sites and
24 operating sites, correct?

25 A. They --

1 Q. We talked about that this morning.

2 A. That was -- yes --

3 Q. Yes?

4 A. -- the restaurants were not allowed to be the
5 distributors.

6 Q. Ms. Bock, that's a yes?

7 A. The restaurants were not allowed to be distributors,
8 correct.

9 Q. And what happened when they said that was you told them,
10 oh, my for-profit restaurant sites aren't actually
11 for-profit restaurant sites, they are nonprofit sites being
12 run by Feeding Our Future, correct?

13 A. As I said, that was a reminder because they had been
14 told multiple times prior.

15 Q. Well, they tried to shut down Safari, Brava, S & S and
16 they were unable to because of the letter you sent, correct?

17 A. No. They informed that they may not be compliant with
18 the regulations and advised that we take steps to ensure
19 they comply.

20 Q. And they after this -- in the wake of this, they tried
21 to put a limit on how many new sites you could open under
22 the sponsorship of Feeding Our Future, correct?

23 A. No.

24 Q. And you didn't like that either. You thought that
25 wasn't allowed, correct?

1 A. Correct.

2 Q. You sued them -- your entities sued them, correct?

3 A. They were sued because they were not issuing site IDs or
4 processing --

5 Q. Ms. Bock, I just asked --

6 A. -- applications --

7 Q. Ms. Bock, you have to answer my questions. We're going
8 to be here for days.

9 MR. UDOIBOK: Objection.

10 BY MR. THOMPSON:

11 Q. Did you sue them?

12 THE COURT: Sustained.

13 You can answer the question now.

14 THE WITNESS: Okay. I'm sorry. What was the
15 question?

16 BY MR. THOMPSON:

17 Q. Did Feeding Our Future sue MDE?

18 A. They did over applications.

19 Q. And that was in, what, the fall of 2020, correct?

20 A. Correct.

21 Q. And you accused them -- Feeding Our Future accused them
22 of discriminating against Feeding Our Future and sites under
23 its sponsorship, correct?

24 A. I don't know if that was in the initial. I know it was
25 at some point.

1 Q. Okay. So yesterday you said that you hadn't accused
2 them of discrimination, but that wasn't true, was it?

3 A. I have not accused them. Feeding Our Future indicated
4 that that was the reason MDE was not approving or denying
5 applications.

6 Q. And when you say "Feeding Our Future," again, this is
7 the company that you run, correct?

8 A. Correct. However, there was a lot of community
9 stakeholders that met and discussed prior to a lawsuit being
10 filed.

11 Q. You retained a lawyer, correct?

12 A. Yes, there was a lawyer.

13 Q. You were the one involved in the paperwork and appearing
14 on behalf of the company, correct?

15 A. Correct.

16 Q. There was no real board of directors at the time?

17 A. Incorrect.

18 Q. And you sued them in November of 2020, correct?

19 A. Yes, to approve or deny applications.

20 Q. Because you were upset that you weren't able to open
21 them quickly enough?

22 A. Incorrect.

23 Q. You wanted to open more and more?

24 A. I did not. I wanted them to respond to applications
25 that were pending because I was getting threats of

1 litigation and questions from the sites wanting to know why
2 we weren't approving them to start.

3 Q. They wanted to get in on the action, correct?

4 A. They wanted to join the food program.

5 Q. Because by this point you had been paying out \$500,000 a
6 month to each of these sites, correct?

7 A. To the limited number that were operating then, yes.

8 Q. And more people wanted to get involved in this program,
9 correct?

10 A. A lot of people wanted to open sites.

11 Q. And you -- of course. And you wanted to sponsor them,
12 correct?

13 A. Not always.

14 Q. Your entity kept 10 percent, correct?

15 A. That is returned to the government at the end of the
16 year if it's not used.

17 Q. And Feeding Our Future in the original lawsuit accused
18 MDE of intentionally and wrongfully refusing to do business
19 with it and discriminating against it because of Feeding Our
20 Future's race, national origin, color and religion; is that
21 right?

22 A. I don't -- I honestly don't recall what it exactly said.
23 I know that it was regarding MDE applications sat in a black
24 hole, and there's a law that they have 30 days to approve or
25 deny.

1 Q. Okay. Later on you sued an employee of MDE personally
2 for defamation, correct?

3 A. He was added.

4 Q. Because he had the temerity to suggest in a news report
5 that there were concerns over fraud in the program, correct?

6 A. Yes, because we had --

7 Q. Okay.

8 A. -- asked him directly and under oath if he was concerned
9 of fraud.

10 Q. Ms. Bock -- okay. And so you sued him for defamation?

11 A. He was added.

12 Q. Sued him personally not in his professional capacity,
13 correct?

14 A. I don't know. I thought it was his professional
15 capacity. I may be wrong.

16 Q. And in that lawsuit you said that his public statements,
17 that he had fraud concerns about Feeding Our Future and its
18 sites, were substantially harmful to Feeding Our Future and
19 defamatory.

20 A. Correct.

21 Q. So his concerns about fraud were defamatory?

22 A. We had --

23 Q. Correct?

24 A. -- asked him multiple times.

25 Q. Ms. Bock, I'm asking you whether you accused him and

1 sued him or your entity sued him for defamation based on
2 that. Yes or no.

3 A. That was included, yes.

4 Q. Okay. Now you said yesterday and again just today that
5 you never personally accused MDE of discrimination; is that
6 right?

7 A. I said I have never sued them for discrimination.

8 Q. No. You said you never said -- you never claimed that
9 they were discriminatory, correct?

10 A. I may have said it. I did not --

11 Q. Okay.

12 A. -- say it to them.

13 Q. You definitely, Ms. Bock, yesterday you testified under
14 oath that you had never personally accused MDE of
15 discrimination, correct?

16 A. Correct. In reference to a lawsuit, yes.

17 Q. Okay. But that's actually not true. You have accused
18 them of discrimination.

19 A. I have said it to people, yes.

20 Q. Okay. So when you told the jury that yesterday, that
21 wasn't true, correct?

22 A. My understanding was that it was in relation to the
23 lawsuit. And, no, I did not say it. I have said it in
24 conversations with others.

25 Q. So yesterday this long answer you just gave me, and

1 you've given my repeatedly, was not what you said when
2 Mr. Udoibok asked you whether or not you had ever personally
3 accused MDE of discrimination.

4 A. I don't recall the exact question or answer, so I can't
5 answer that.

6 Q. Well, in reality you have, correct?

7 A. Yes, as I said, I have said that to people.

8 Q. And in fact we -- during the trial we've seen this video
9 of the celebration that Sahra Nur, Qamar Hassan and others
10 held for you when the program was -- when the stop pay was
11 lifted in the spring of 2021, correct?

12 A. It was not a celebration for me, and it was -- they were
13 referring to the fact that MDE had been held in contempt of
14 court for violating --

15 Q. You received an award, correct?

16 A. For supporting the community.

17 Q. Little trophy?

18 A. Yes, of sorts.

19 Q. Plaque of something?

20 A. Some little.

21 Q. Okay. And you gave a speech at that thing?

22 A. I did, yes.

23 Q. Okay.

24 A. Multiple people did. I think it there was seven or
25 eight.

1 Q. I'm asking about you. You gave a speech, correct?

2 A. Correct.

3 Q. And during your speech in front of all these people, you
4 publicly accused MDE of discrimination, correct?

5 A. I said that I believed they were acting in a
6 discriminatory manner.

7 Q. Which is not what you told the jury yesterday.

8 A. Again, my understanding of the question and the answer I
9 provided was in reference to the lawsuit, and I have never
10 directly said to MDE that they are being racist.

11 Q. Okay. I'm going to show you now what's been marked, but
12 not yet admitted, as Government Exhibit R39.

13 One moment, Your Honor.

14 (Counsel confer)

15 MR. THOMPSON: One moment, Your Honor.

16 (Counsel confer)

17 THE COURT: Counsel, do we need to take a break?

18 MR. THOMPSON: Maybe. Well, yeah.

19 THE COURT: All right. Five-minute break,
20 everybody.

21 All rise.

22 4:12 p.m.

23 **IN OPEN COURT**

24 **(JURY NOT PRESENT)**

25 THE COURT: Ms. Bock, do you want to step down and

1 take a break.

2 Is this an argument break or a break break?

3 MR. THOMPSON: We might need to advise counsel and
4 the court.

5 THE COURT: You may be seated.

6 MR. THOMPSON: So Ms. Bock yesterday, Your Honor,
7 testified that she had never personally accused MDE of
8 discrimination or racism. Obviously, she's walked that back
9 here. In reality, she did.

10 Earlier we saw that video of the celebration.
11 We've since done some digging on the internet, and there's a
12 video of the more -- a fuller video of that event during
13 which Ms. Bock gives a speech and publicly accuses MDE of
14 discrimination. And we want to play a 20-second, 20- to
15 25-second clip of that video --

16 THE COURT: All right.

17 MR. THOMPSON: -- that shows that. I'm happy to
18 lay foundation through Ms. Bock, but I don't think there's a
19 problem here.

20 THE COURT: What's the objection?

21 MR. UDOIBOK: Multiple.

22 Assuming he can lay foundation, the authentication
23 of the video will be an issue. And the complete -- is it
24 going to be the entirety of the video? Has it been altered
25 in any way? We don't know. And if he's going to play a

1 snippet, if the court is more inclined to allow it, he
2 should play the entire video.

3 THE COURT: How long is the entire video?

4 MR. THOMPSON: 54 minutes. I mean, there's
5 politicians speaking at it, a lot of people speaking at it.
6 Obviously their statements are hearsay, but Ms. Bock's are
7 not.

8 THE COURT: So what you want to get into evidence
9 is her statements and not the statements of everybody else?

10 MR. THOMPSON: Correct.

11 THE COURT: And is the R39 just the clip of her?

12 MR. THOMPSON: Correct. I can play it, if you
13 want, Your Honor. Maybe it would be helpful.

14 THE COURT: Sure.

15 MR. UDOIBOK: Your Honor, before you listen to the
16 video, just Mr. Thompson as to clarify whether that's the
17 entirety of Ms. Bock's statement.

18 MR. THOMPSON: It's definitely not the entirety of
19 her statement.

20 MR. UDOIBOK: Okay.

21 MR. THOMPSON: It's the entirety -- it's the
22 portion or a portion where she directly accuses MDE of
23 discrimination, which is contrary to her testimony to the
24 jury yesterday.

25 THE COURT: Okay. Go ahead.

1 MR. UDOIBOK: But, Your Honor, the jury is not
2 going to be able to put into context what --

3 THE COURT: I just want to see this part. I tend
4 to agree with you on the context piece, but go ahead.

5 (Video recording played)

6 MR. THOMPSON: Hold on. There we go.

7 (Video recording played)

8 THE COURT: Where did it come from?

9 MR. THOMPSON: The internet.

10 THE COURT: Can you be more specific?

11 MR. THOMPSON: Someone posted it on the internet
12 recently. It was taken down in the wake of the search
13 warrants. I believe it was posted on a website called
14 Xogmaal Media. You might be familiar with that website
15 because its founder and owner was charged and later pled
16 guilty in this case. And it recently popped back up on the
17 internet.

18 THE COURT: And you have the entire video?

19 MR. THOMPSON: Correct.

20 THE COURT: Okay. Your concern is completeness,
21 Mr. Udoibok.

22 MR. UDOIBOK: Yes. Yes, Your Honor. And
23 authenticity and the whole -- and it's not complete. The
24 jury will be confused. It's out of context possibly.

25 THE COURT: Okay.

1 MR. UDOIBOK: And, frankly, it's not relevant. My
2 questioning of Ms. Bock was whether she's ever sued.

3 THE COURT: Well, that's a matter for the jury to
4 decide.

5 Here's what I'm going to do. I'm going to allow
6 this clip. I don't, I don't have an authenticity. I don't
7 see an authenticity issue with it, but I do think that
8 Mr. Udoibok ought to have the entire video produced to him
9 so that he can use any part of it, if he wishes.

10 MR. THOMPSON: Okay.

11 THE COURT: So the exhibit can come in, but I want
12 the entire video produced to Mr. Udoibok so that he can use
13 it, if he wishes.

14 MR. THOMPSON: That's fine, although I think there
15 would still be hearsay and potential issues with the
16 admission of the rest of that video.

17 THE COURT: I'm not saying I'm going to admit it.
18 I'm saying he's entitled to see it, to hear it, particularly
19 if this clip is not, and it looks like it is not, Ms. Bock's
20 entire comment. Okay? I'm not saying he gets to use it,
21 but he certainly gets to see it.

22 MR. THOMPSON: Great. Thank you.

23 THE COURT: Okay. Let's take a five-minute --
24 well, no, I'm just going to bring them in.

25 We're going to have to break anyway at 4:40 for a

1 ten-minute break.

2 Kristine.

3 Let's be off the record for a moment.

4 **(Off the record)**

5 4:19 p.m.

6 **IN OPEN COURT**

7 **(JURY PRESENT)**

8 THE COURT: You may all be seated.

9 The video is admitted and may be published.

10 MR. THOMPSON: Your Honor, I'm going to --

11 BY MR. THOMPSON:

12 Q. Or, Ms. Bock, I'm going to ask you a couple other
13 questions here.

14 This dispute you had with MDE, you've said
15 repeatedly that you tried to raise concerns with them,
16 correct?

17 A. Correct.

18 Q. But it turns out in the lawsuits you didn't do any such
19 thing, correct?

20 A. I don't know what you mean by that.

21 Q. When you sued them for trying to, for not approving your
22 site applications quickly enough, you didn't raise your
23 fraud concerns in the context of that litigation, did you?

24 A. The lawsuit was not about approving applications. It
25 was about processing them. It specifically said approval or

1 denial. They just needed to be processed.

2 Q. When you sued them for not, in your mind, processing
3 your applications in the appropriate fashion, you didn't
4 raise your concerns about fraud in that lawsuit, did you?

5 A. I raised them as I had them. So, no, at that point I
6 did not have the concerns, so they weren't raised.

7 Q. And that was true when you first filed the lawsuit in
8 November of 2020, correct?

9 A. Correct.

10 Q. That was true later in the spring of 2021, correct?

11 A. No. We had terminated site -- well, like I said,
12 U.S. African Chamber of Commerce and Hoya Cafe we did
13 surveillance on and they terminated their relationship
14 before we could.

15 Q. I am just saying in the context of your relationship
16 with MDE, you didn't say, We have concerns about fraud?

17 A. That's not the proper forum.

18 Q. Okay. You didn't do it?

19 A. Not in the lawsuit no. That would not be the
20 appropriate place.

21 Q. When you had skirmishes in this litigation, you didn't
22 raise it with them, correct?

23 A. We asked them about it, yes.

24 Q. You didn't raise it in your filings, correct?

25 A. In the filings, no. That's not the appropriate place.

1 Q. You didn't in your affidavits that you submitted in
2 connection with that lawsuit, correct?

3 A. Again, claims were not an issue of the lawsuit, so it
4 would be irrelevant and not the proper forum.

5 Q. So when you say that MDE was so frustrating to you they
6 wouldn't help, they just stood in the way, when you were --
7 you and your lawyer were talking to their lawyers, you
8 didn't raise the issue, correct?

9 A. We did. Multiple times.

10 Q. And you didn't -- in fact, when one of the MDE lawyers
11 raised his concern about fraud, you sued him for defamation,
12 correct?

13 A. We asked for clarification prior. I emailed him
14 instead --

15 Q. Ms. Bock, I'm asking --

16 A. -- if he had concerns of fraud, to please let me know so
17 I could take action.

18 Q. Ms. Bock, you sued him for defamation, correct?

19 A. Eventually.

20 Q. So your protest to this jury over the last several days
21 that you were so concerned about fraud and that you were
22 trying to root it out, that didn't manifest itself at that
23 time in April of 2021, correct?

24 A. Not in the lawsuit. Again, that was --

25 Q. In fact, when -- one would think that when a Minnesota

1 Department of Education employee raises concerns about
2 fraud, that would have been a perfect time for you to say,
3 hey, you are right, I have concerns too. But you didn't do
4 that, did you?

5 A. I emailed him and asked him if he had concerns; and if
6 he did, to please let me know so I could take appropriate
7 action as the sponsor.

8 Q. But you didn't tell him that you had concerns, did you?

9 A. We already had.

10 Q. You sued him for --

11 A. As we found them, we expressed our concerns.

12 Q. You sued him for defamation.

13 A. Because he denied saying it and he would not respond to
14 any questions regarding if it was a factual statement, if
15 there was something we needed to be aware of. An
16 investigation showed that even internal --

17 Q. Ms. Bock, that's --

18 A. -- there was no fraud concerns.

19 MR. THOMPSON: Your Honor, I move to strike. This
20 is nonresponsive.

21 THE COURT: Overruled.

22 BY MR. THOMPSON:

23 Q. Okay. In fact, Feeding Our -- or the Minnesota
24 Department of Education issued a serious deficiency against
25 Feeding Our Future in January of 2021; is that right?

1 A. That's correct.

2 Q. They had raised concerns about your organization; is
3 that right?

4 A. They had some concerns.

5 Q. And one of the concerns was your nonprofit status,
6 correct?

7 A. That's what they said.

8 Q. They were concerned that you had -- had for a time lost
9 your nonprofit status, correct?

10 A. That's what they believed.

11 Q. And they were concerned that you weren't operating as a
12 proper nonprofit entity, correct?

13 A. That's what they said. It wasn't true.

14 Q. They were also concerned -- okay. They were also
15 concerned that you didn't have an audit of your books,
16 correct?

17 A. Incorrect. We had an audit, but the auditor had failed
18 to post it to the -- there's a federal audit clearinghouse,
19 and it was not posted.

20 Q. So they hadn't received it?

21 A. It was not posted. They had received a copy of it in
22 SharePoint, as well as via email.

23 Q. And these were concerns that seemed kind of squarely at
24 issue in this case, I would think, right?

25 A. Pertaining to approval or denial of site applications,

1 no.

2 Q. And this case isn't about the approval or denial of site
3 applications. This is about fraud. You understand that,
4 right?

5 A. Oh, this case. Sorry. I thought you were referencing
6 the case we were talking about.

7 Q. No. This case.

8 So their concerns about whether or not Feeding Our
9 Future's operating as a nonprofit, that seems like a
10 relevant concern in light of the situation we find ourselves
11 in today, correct?

12 A. Well, Feeding Our Future was always a nonprofit and
13 never lost its status, so I don't believe it's relevant here
14 today.

15 Q. Because there's rules for nonprofits, correct?

16 A. There are.

17 Q. About how they use their money?

18 A. Correct.

19 Q. How they spend their money?

20 A. Correct.

21 Q. They need -- you've heard testimony at this trial
22 someone cannot own a nonprofit, correct?

23 A. Correct.

24 Q. You have to have a board directors?

25 A. Correct.

1 Q. That was a concern with respect to Feeding Our Future,
2 correct?

3 A. I don't recall that, no.

4 Q. You recall the testimony of Ben Stayberg?

5 A. I heard his testimony. I am not surprised that
6 individuals are distancing themselves from Feeding Our
7 Future as quickly and fastly as they can, given the media
8 coverage and the allegations.

9 Q. So your -- okay. So you are suggesting you actually had
10 a board of directors?

11 A. There was a board of directors.

12 Q. And they're just lying on the stand here because they
13 don't want to be associated with Feeding Our Future?

14 A. I didn't say they were lying. They all testified that
15 they had been asked to be on the board of directors. And I
16 did have conversations with each and every one of them at
17 various points, including Ben Stayberg who had called me
18 after he received --

19 Q. Ms. Bock.

20 A. -- the serious deficiency notice.

21 Q. Ms. Bock -- okay. All right. MDE instituted a stop
22 pay; is that right?

23 A. They did.

24 Q. And this stop pay was in the spring of 2021; is that
25 right?

1 A. Correct.

2 Q. And the stop pay said that they would no longer rely on
3 your CLiCS certifications to pay out claims, correct?

4 A. That's not what they said.

5 Q. In fact, it said that you were going to have to show the
6 documentation upfront before getting paid, correct?

7 A. They were reviewing claims that had been submitted.
8 They stated it was due to a serious deficiency that had been
9 issued that had nothing to do with claims.

10 Q. Okay. Well, let's take a look. I'm going to show you
11 what's been marked Government Exhibit R2.

12 And is this the notice of serious deficiency that
13 was sent by MDE to you on March 31st of 2021?

14 A. Correct.

15 MR. THOMPSON: Your Honor, I move to admit
16 Government Exhibit R2.

17 THE COURT: Any objection?

18 MR. UDOIBOK: No objection.

19 MR. MONTEZ: No objection.

20 THE COURT: R2 is admitted.

21 BY MR. THOMPSON:

22 Q. Okay. And this is sent here to you as the founder and
23 executive director of Feeding Our Future, correct?

24 A. Correct.

25 Q. And your home address, correct?

1 A. Correct.

2 Q. And Ben Stayberg, the president of the board of
3 directors of Feeding Our Future?

4 A. Yes, he also received a certified letter -- or certified
5 copy of this by mail, and we discussed.

6 Q. Okay. So you say.

7 A. My phone records reflect.

8 Q. Ms. Bock, your phone records aren't in evidence.

9 I direct your attention to page 4 of this exhibit.
10 Well, it starts on page 2 here. This is the letter
11 addressed to Aimee Bock and Benjamin Stayberg, correct?

12 A. Correct.

13 Q. And it talks about this letter concerns the failure of
14 Feeding Our Future to operate the Child and Adult Care Food
15 Program in conformance with the performance standards set
16 forth by the program, correct?

17 A. Yes. This is a form letter, so that part is --

18 Q. And they want to -- are proposing to terminate your
19 participation in the program, correct?

20 A. That is by law part of this form letter, and that is
21 what happens depending on the outcome of the serious
22 deficiency. That's the process.

23 Q. So that's -- I'm not asking about the process. I'm
24 asking if that's what it says.

25 A. It is what it says.

1 Q. Okay. It goes on. And here is the portion I want to
2 direct your attention to on page 4.

3 "As a result of this serious deficiency, the
4 Feeding Our Future program meal claims will be held on stop
5 pay in CLiCS until the claim is validated by the state
6 agency, which will be determined by your submission of the
7 corrective action plan and meal validation documentation."
8 Correct?

9 A. That's what it says.

10 Q. Okay. So they're asking for submission of a corrective
11 action plan and meal validation documentation?

12 A. That's correct.

13 Q. Okay. "No additional site ID requests will be created
14 in CLiCS, nor transferred." Correct?

15 A. Correct.

16 Q. Okay. So they want documentation now?

17 A. They do.

18 Q. Correct?

19 A. And we requested what documentation.

20 Q. Ms. Bock, I'm asking you a question. Did they ask you
21 for documentation?

22 A. Yes.

23 Q. Okay. That's what this means.

24 So all up until here, you could just submit claims
25 and Feeding Our Future would pay them out, correct, based on

1 the submissions you certified and submitted via CLiCS?

2 A. That's what --

3 Q. Correct?

4 A. -- MDE has said.

5 Q. Okay.

6 A. They set their own claim validation process.

7 Q. But starting with this letter, this stop pay, that was
8 no longer going to be the case, correct?

9 A. For the claims that were pending.

10 Q. They wanted to see documentation upfront, correct?

11 A. For those claims, yes.

12 Q. And that was a problem, correct?

13 A. The fact that it was being implemented outside of what
14 the law allows was the problem.

15 Q. And it was also a problem because you suddenly had to
16 have documentation, correct?

17 A. Incorrect. We had documents.

18 Q. The documentation included meal counts?

19 A. Correct.

20 Q. Invoices?

21 A. Correct.

22 Q. Attendance rosters?

23 A. Not required, but we did collect.

24 Q. Well, they were asking for them, correct?

25 A. For the sites that they were required for.

1 Q. And they weren't going to be paying out the claims if
2 you didn't submit them, correct?

3 A. That's what they claimed.

4 Q. Well, they --

5 A. That's what they said, yes.

6 Q. So they get to decide, correct?

7 A. They do. Absolutely.

8 Q. Okay.

9 A. They're the government.

10 Q. And so you went about collecting these documents,
11 correct?

12 A. Of course.

13 Q. You reached out to all the sites?

14 A. I don't know if the sites were contacted directly. I
15 know that there was some information that had not been in
16 the file, and they may have contacted them. I don't know
17 who.

18 Q. You went about collecting these documents to give to
19 MDE, correct?

20 A. Of course.

21 Q. Put them in folders?

22 A. I don't -- I assume they were put in folders, yes. I
23 mean, all the claims were.

24 Q. I mean, you went about doing this, correct? You are the
25 executive director of the company?

1 A. I did not collect the documentation, no. The claim
2 staff coordinators and support staff would put together all
3 of the documents they had reviewed for the claims.

4 Q. Okay. And they collected those meal counts we've seen
5 so often, correct?

6 A. Yes.

7 Q. The invoices?

8 A. Correct.

9 Q. The rosters? The fake rosters, correct?

10 A. The rosters that were not required or used, yes.

11 Q. But they were going to be used now because MDE was
12 asking for them.

13 A. Absolutely not. MDE was aware of the requirement and
14 was aware of our plan, and so they knew that they were not
15 being entered into CenterPilot or used as part of a claim.

16 Q. And in fact you -- hold on. Okay. I'm going to show
17 you what's been marked as Government Exhibit R38. It's not
18 yet in evidence. I think this is in evidence somewhere, but
19 in any event --

20 MR. UDOIBOK: It's in evidence.

21 THE COURT: It is in evidence. I just don't know
22 if it's in evidence as R38.

23 MR. THOMPSON: I don't think it is, not as R38,
24 but --

25 MR. UDOIBOK: I won't object to it.

1 THE COURT: A duplicative exhibit is not going to
2 hurt anybody at this point, I don't think.

3 MR. THOMPSON: Well, if it doesn't hurt your
4 feelings, it doesn't hurt mine. I move to admit Government
5 Exhibit R38.

6 THE COURT: Any objection?

7 MR. UDOIBOK: No objection.

8 MR. MONTEZ: No objection.

9 THE COURT: R38 is admitted.

10 BY MR. THOMPSON:

11 Q. All right. Ms. Bock, this is an email you sent to your
12 Feeding Our Future office staff on April 18th, 2021; is that
13 right?

14 A. Yes.

15 Q. And this is shortly after this stop pay was put in
16 place, correct?

17 A. Of course. We were collecting and organizing the
18 documents.

19 Q. And the documents that you were collecting you specify,
20 correct?

21 A. I did.

22 Q. In fact, you say that "I" -- you, Aimee Bock, correct?

23 A. Yes.

24 Q. -- "am working on collecting the requested documents for
25 MDE." Correct?

1 A. That's what it says.

2 Q. The documents that they want?

3 A. Absolutely.

4 Q. Okay. And the documents that MDE is looking for, you
5 specify in your email, correct?

6 A. Correct.

7 Q. Menus?

8 A. Absolutely.

9 Q. Receipts?

10 A. Correct.

11 Q. Meal counts?

12 A. Yes.

13 Q. Attendance records?

14 A. For the programs and sites that required it, yes.

15 Q. That's what MDE was looking for?

16 A. They were looking for the documentation related to the
17 claims that were pending.

18 Q. So I know you keep insisting that these attendance
19 rosters weren't required, and I guess I understand why.
20 Because they're -- they don't match, right?

21 A. No. They were not required. That was just it. The
22 federal regulations require attendance for children that are
23 present.

24 Q. So you just decided or the sites just decided we'll just
25 come up with lists of 5,000 fake kids' name for fun?

1 A. No. After discussion during an administrative review,
2 my understanding of a recommendation from MDE was that we
3 use that time as an opportunity to practice, to build
4 habits. So, like I said, when the waivers ended, they would
5 know it was a requirement. However, it would be
6 significantly easier because the children are sitting there
7 eating.

8 Q. So you told them to make up fake rosters for practice?

9 A. I did not tell them to make up.

10 Q. Okay. They just did that on their own?

11 A. I told them that they needed to develop a habit of
12 attendance and that I wanted them to submit them -- well, my
13 staff told them; I didn't talk to all the sites -- that we
14 wanted them to submit them monthly because without notice
15 the rules and regulations could change.

16 Q. And, of course, MDE had asked for it, correct?

17 Ms. Honer testified to this, that they -- rosters were
18 required?

19 A. She stated they were. And they were for many programs,
20 but not all.

21 Q. Okay. And so for those programs for which you collected
22 attendance rosters, they were fake, correct?

23 A. It turns out we did not review them, so no one knew at
24 the time.

25 Q. Of course, they were fake because the kids were fake,

1 correct?

2 A. There's a difference between the participants that
3 received meals and the names that were on those papers.

4 THE COURT: Mr. Thompson?

5 MR. THOMPSON: Yes.

6 THE COURT: We need to end.

7 MR. THOMPSON: That's fine.

8 THE COURT: We're going to end for the day. You
9 will come back at 9:00 tomorrow morning. We will see you
10 then.

11 All rise for the jury.

12 4:36 p.m.

13 **IN OPEN COURT**

14 **(JURY NOT PRESENT)**

15 THE COURT: All right. We're off the record. Let
16 me talk to the attorneys for a moment.

17 (Court adjourned at 4:41 p.m., 03-13-2025.)

18 * * *

19 I, Renee A. Rogge, certify that the foregoing is a
20 correct transcript from the record of proceedings in the
21 above-entitled matter.

22 Certified by: /s/Renee A. Rogge
23 Renee A. Rogge, RMR-CRR

24

25