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UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

United States of America,)	
)	File No. 22-cr-124
Plaintiff,)	(NEB/DTS)
)	
v.)	
)	
Abdiaziz Shafii Farah(1),)	Courtroom 13W
Mohamed Jama Ismail(2),)	Minneapolis, Minnesota
Abdimajid Mohamed Nur(4),)	Wednesday, May 22, 2024
Said Shafii Farah(5),)	9:08 a.m.
Abdiwahab Maalim Aftin(6),)	
Mukhtar Mohamed Shariff(7),)	
Hayat Mohamed Nur(8),)	
)	
Defendants.)	

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

JURY TRIAL PROCEEDINGS - VOLUME XXI OF XXX

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

* * *

Proceedings recorded by mechanical stenography;
Transcript produced by computer.

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IN OPEN COURT

(JURY PRESENT)

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

And, Ms. Roase, you are still under oath and on the stand.

PAULINE ROASE,

called on behalf of the government, was previously sworn, was further examined and testified as follows:

THE COURT: And, Mr. Thompson, you may continue.

MR. THOMPSON: Thank you, Your Honor.

DIRECT EXAMINATION (Resumed)

BY MR. THOMPSON:

Q. Good morning, Ms. Roase.

A. Good morning.

Q. Welcome back.

When we left off at the end of the day yesterday, you were talking about your efforts to follow the money in this case; is that right?

A. Yes.

Q. And you were discussing the efforts you took to go through bank accounts and follow money as it transferred from various entity to entities; is that right?

A. Yes, that's right.

Q. I want to take you back to Government Exhibit M-13a. Again, can you describe this?

1 A. Yeah. So this is, again, this is the combined Empire
2 Cuisine & Market bank accounts. There were, again, there
3 were three of them.

4 And so the combined period of review is from the
5 beginning of the first bank account that was opened, which
6 is May 12th, 2020, to the last account that was opened
7 through April 21st, 2022.

8 The sources side of the chart here is the money
9 that was coming into the account, and the uses side on the
10 right is the outflow of that money, how that was spent.

11 Q. We talked yesterday about this outflow and your efforts
12 to trace the funds to see if food was purchased; is that
13 right?

14 A. Yes, that's right.

15 Q. We went through a number of the items on the right side;
16 is that correct?

17 A. Yes.

18 Q. Empire Enterprises, right?

19 A. Yes.

20 Q. We talked about the food expense. And you -- you were
21 taking a conservative calculation; is that right?

22 A. Yes, that's right.

23 Q. Can you discuss that, again, or just briefly summarize?

24 A. Yeah. So if it appeared to be for, you know, possible
25 food purchase, I categorized it as food. You know, all, you

1 know, Sysco, all Sahal Wholesales, Gold Star Distribution,
2 all payments made is categorized as food expense.

3 But as we saw in some of the invoices yesterday,
4 some of the food expenses was actually for the restaurant or
5 for the market. So I didn't separate those out. It's part
6 of this \$3.1 million.

7 Q. Okay. And we talked yesterday about a lot of the other
8 categories here that were not food, correct?

9 A. Right. Yes.

10 Q. And you followed those down to various entities; is that
11 right?

12 A. Yes.

13 Q. What were you looking for when you did that?

14 A. I was looking for food. If -- if food was not purchased
15 out of the Empire Cuisine & Market account, I was hoping to
16 find food further down the chain. If it was moved, you
17 know, if there were checks written out to other entities, I
18 just -- I kept following that money and just seeing what was
19 being done in those accounts.

20 Q. Right. Okay. But we talked about Empire Enterprises
21 yesterday, correct?

22 A. Yes.

23 Q. And whose entity was that?

24 A. That was Abdiaziz Farah's.

25 Q. Talked about Bushra Wholesalers yesterday; is that

1 right?

2 A. Yes.

3 Q. And whose entity was Bushra Wholesalers?

4 A. That's Said Farah's and Abdiwahab Aftin.

5 Q. I want to go here. And obviously we talked about bank
6 accounts or the seizures, real estate purchases, foreign
7 transfers. But this line here, \$1.9 million to Defendants'
8 Other Entities, could you describe what that column is
9 referring to?

10 A. Yeah. So it's LLCs that the defendants have. So -- so
11 outside of the -- I would consider the main four entities,
12 Empire, Bushra, Afrique and ThinkTech, outside of that,
13 that's what this category is for.

14 Q. And did you identify those entities through your
15 examination of the bank records?

16 A. Yes, I did.

17 Q. Okay. And did you create a subchart of this that shows
18 the payments to those other entities belonging to the
19 defendants?

20 A. Yes, I did.

21 Q. I want to show you now what's been marked, but not yet
22 admitted, as Government Exhibit M-13ah.

23 Ms. Roase, is this the chart summarizing that
24 information?

25 A. Yes, it is.

1 Q. Did you create it in the same method in which you
2 created similar charts we've looked at?

3 A. Yes.

4 MR. THOMPSON: Your Honor, I'd move to admit
5 Government Exhibit M-13ah?

6 THE COURT: Any objection?

7 M-13ah is admitted.

8 BY MR. THOMPSON:

9 Q. All right. Ms. Roase, I'm going to -- now that the jury
10 can see it, can you just orient us to this summary chart and
11 explain to us what it depicts?

12 A. Yeah. So this is a subset of the M-13a exhibit that we
13 just saw. This is just related to the defendant --
14 Defendants' Other Entities category, and so this just breaks
15 that out.

16 Q. Okay. And so that \$1.9 million that went from Empire
17 Cuisine & Market to these other entities, can you take us
18 through it? What's the first entity listed here?

19 A. The first one is MIB Holdings LLC, which is Mahad
20 Ibrahim's LLC.

21 Q. And I believe we discussed that one yesterday; is that
22 right?

23 A. Yes, we did.

24 Q. Did you examine the bank accounts of MIB Holdings LLC?

25 A. Yes, I did.

1 Q. What were you looking for?

2 A. I was looking for food purchases.

3 Q. And did you find such purchases?

4 A. I did not.

5 Q. And instead Government Exhibit M-19 summarizes that
6 account, MIB Holdings, correct?

7 A. Yes, that's right.

8 Q. Mahad Ibrahim's company?

9 A. Yes.

10 Q. \$2.1 million in?

11 A. Yes.

12 Q. Where did that money come from?

13 A. It came from Empire Cuisine, Bushra Wholesalers, Empire
14 Enterprise, Afrique Hospitality Group.

15 Q. All the entities involved in the Federal Child Nutrition
16 Program here?

17 A. Yes.

18 Q. Belonging to the defendants?

19 A. Yes.

20 Q. And on the right, how is that money used?

21 A. So other than the seizure of the account, \$900,000, it
22 went towards property expenses, which was the construction
23 of his house in Ohio; credit card expenses were -- which
24 were all personal in nature; and then other business
25 investments that we saw for the escape room.

1 Q. Directing your attention back to Government
2 Exhibit M-13ah, did you conduct a similar analysis of the
3 other entities that received money from Empire Cuisine &
4 Market?

5 A. Yes, I did.

6 Q. The next one listed is an entity called Nur Consulting
7 LLC.

8 A. Yes.

9 Q. What is Nur Consulting LLC?

10 A. It is an entity that was created by Abdimajid Nur.

11 Q. That's the defendant in the case?

12 A. Yes, that's right.

13 Q. And, well, let's talk about when it was created. Okay?

14 A. Okay.

15 Q. Let me ask you this: You testified yesterday that when
16 you were investigating this case, you saw a pattern of LLCs
17 being formed; is that right?

18 A. Yes, that's right.

19 Q. What was that pattern that you saw?

20 A. What I saw was a lot of newly-formed LLCs during the
21 COVID period, and it seemed to be created specifically for
22 the food nutrition program, to receive that money.

23 Q. When you say "created for the food nutrition program,"
24 what do you mean?

25 A. It was filed with the Secretary of State, and then they

1 could open up a bank account with that.

2 Q. Okay. And when you looked at those accounts, generally
3 what did you find in terms of the deposits into them?

4 A. So, again, I was looking for food purchases. And what I
5 saw was main source of income usually was food nutrition
6 money and usually it was not for food.

7 Q. Okay. Did Nur Consulting LLC, Abdimajid Nur's company,
8 follow that pattern?

9 A. Yes, it did.

10 Q. All right. I'm showing you Government Exhibit B-10 on
11 page 3, which is the articles of organization for Nur
12 Consulting; is that right?

13 A. Yes, that's right.

14 Q. And, again, who formed Nur Consulting?

15 A. The organizer is Abdimajid Nur.

16 Q. What address is listed there?

17 A. It's 2606 Vierling Drive in Shakopee, Minnesota.

18 Q. Do you recognize that address?

19 A. I do.

20 Q. How so?

21 A. I believe that's his home address.

22 Q. And directing your attention to page 2 of this exhibit,
23 when did Abdimajid Nur create Nur Consulting LLC?

24 A. April 4th, 2021.

25 Q. Did you -- after you identified this entity, did you

1 conduct an analysis of its bank records?

2 A. Yes, I did.

3 Q. Did it have a bank account?

4 A. Yes. There were two.

5 Q. Okay. First, direct your attention to Government
6 Exhibit O-29. Do you recognize Government Exhibit O-29?

7 A. Yes, I do. This is the signature card for the account
8 opening of Nur Consulting at Old National Bank.

9 Q. Okay. And what's the date on which -- well, who opened
10 this account?

11 A. The name is Abdimajid Mohamed Nur.

12 Q. Is he listed as the signer on the account?

13 A. Yes.

14 Q. What's the date he opened the account?

15 A. April 5th, 2021.

16 Q. And you said you examined this account?

17 A. Yes, I did.

18 Q. What were you looking for?

19 A. I was looking for any food purchases.

20 Q. Did you find that?

21 A. I did not.

22 Q. Instead, what did you find when you looked at this
23 account?

24 A. It was personal expenditures. I want to say travel
25 expenses.

1 Q. Before we get to how it was spent, what did you find
2 going into the account? And I'll direct your attention to
3 page 28 here.

4 A. Yeah. So, yeah, so this is a check from Empire Cuisine
5 & Market dated April 1st, 2021, for \$30,000. It's made out
6 to Nur Consulting, and the memo line says consulting.

7 Q. And the date on this check is April 1st, 2021?

8 A. April 1st, right.

9 Q. How does that compare to the date that the company was
10 created?

11 A. I believe it was just a couple days prior to the
12 opening.

13 Q. And I'll direct your attention to page 29. Was there
14 another deposit a couple days later on April 8th?

15 A. Yes. This one is for \$15,000, and the memo line says
16 contracted services.

17 Q. Okay. Had you seen checks like this before to Abdimajid
18 Nur from Empire Consulting?

19 A. I did. Not to Nur Consulting, but personally.

20 Q. But personally?

21 A. Yes.

22 Q. What did you see?

23 A. Before Nur Consulting was created, Abdimajid Nur was
24 receiving checks made out to him personally from Empire
25 Cuisine & Market, and the memo line said it was for

1 consulting.

2 Q. And I'll look at an example here. Government
3 Exhibit O-8 is one of the Empire Cuisine & Market's bank
4 accounts; is that right?

5 A. Yes.

6 Q. At Old National Bank?

7 A. Yes.

8 Q. And directing your attention to page 20 -- I'm sorry --
9 page 120, is there a check written on March 11th of 2021
10 from Empire Cuisine & Market?

11 A. Yes, there was.

12 Q. Who is it written to?

13 A. It's written out to Abdimajid Nur for \$7,000, and the
14 memo line says consulting.

15 Q. Okay. And on -- is there a similar check on page 123 of
16 Government Exhibit O-8?

17 A. Yes, there is.

18 Q. Can you describe that check?

19 A. This is another check made payable to Abdimajid Nur.
20 This was for \$30,000. And the memo line says consulting.

21 Q. And these were prior to the creation of Nur Consulting?

22 A. Yes, that's right.

23 Q. For Nur Consulting, you said you did a financial
24 analysis of that account; is that correct?

25 A. Yes, I did.

1 Q. I'd like to show you what has been marked, but not yet
2 admitted, as Government Exhibit M-25. Do you see Government
3 Exhibit M-25?

4 A. Yes, I do.

5 Q. What is it?

6 A. So this is another sources and uses exhibit chart. This
7 shows the combined Nur Consulting bank accounts, sources and
8 uses. Again, there were two Nur Consulting accounts, and so
9 that's what this shows.

10 Q. Okay.

11 MR. THOMPSON: Your Honor, I would move to admit
12 Government Exhibit M-25.

13 THE COURT: Any objection?

14 MR. SAPONE: No objection.

15 THE COURT: M-25 is admitted.

16 BY MR. THOMPSON:

17 Q. Okay. Ms. Roase, we'll start at the top. Can you just
18 describe, again, now that the jury can see it, what this
19 chart shows?

20 A. Yeah.

21 THE COURT: Can you see? No, not yet?

22 COURTROOM DEPUTY: Nope.

23 THE COURT: Thank you.

24 THE WITNESS: Yeah. So, again, this is the
25 combined Nur Consulting LLC bank accounts. The combined

1 period of review is from the account opening of the first
2 account, which is April 5th, 2021, and the period of review
3 ended January 31st, 2022.

4 BY MR. THOMPSON:

5 Q. And starting on the left, could you -- this is the
6 sources of funds?

7 A. Yes, it is.

8 Q. Again, what does that mean?

9 A. So these were all the deposits made into the account.
10 And so you can see Empire Cuisine & Market was a total of
11 \$405,000; Bushra Wholesalers, 220,000; Empire Enterprises,
12 121,000; and ThinkTechAct, 77,000. And then there's also
13 just one -- there's from Abdiaziz's personal account, too,
14 there was another \$25,000 deposit.

15 Q. What was the total amount of money?

16 A. Total amount money --

17 Q. Deposited into this account during this roughly, what,
18 seven-month period, eight-month period?

19 A. Yeah, it's over \$900,000.

20 Q. From April 2021 to January 2022?

21 A. That's right.

22 Q. Did you look at how Abdimajid Nur spent or used the
23 money, the \$900,000 that were deposited to the Nur
24 Consulting account during that period from April 2021 to
25 January of 2022?

1 A. Yes, I did.

2 Q. Again, what were you looking for?

3 A. I was looking for food purchases.

4 Q. Did you find any?

5 A. I did not.

6 Q. What did you find?

7 A. So you can see the largest withdrawal is Abdimajid Nur.
8 Sorry. I spelled that wrong. But it's -- those are
9 deposits to his personal account. Individuals, that's other
10 people that are getting paid 140,000. There's auto
11 expenses, 96,000.

12 Q. And, Ms. Roase, if I can just stop you there, when you
13 say "auto expense," what do you mean?

14 A. I believe this was for a vehicle purchase.

15 Q. Buying a car?

16 A. Buying a car.

17 Q. And how much was spent on buying a car out of the
18 Abdimajid Nur's Nur Consulting account?

19 A. \$95,855.65.

20 Q. How much was withdrawn in cash during that eight-month
21 period out of the Nur Consulting account?

22 A. \$74,604.

23 Q. After that, there's a line that says Assets - Property
24 Expense?

25 A. Yes. I believe that was a down payment for a house.

1 Q. How much did he put down on the house?

2 A. \$57,000.

3 Q. And we've talked about the bank account seizures before;
4 is that right?

5 A. Yes, that's right.

6 Q. How much -- in the Foreign Transfers column, how much
7 money was transferred abroad from Abdimajid Nur's Nur
8 Consulting LLC account during that eight-month period?

9 A. \$39,000.

10 Q. And what's Retail here?

11 A. Yeah, that's miscellaneous purchases at, you know,
12 clothing stores, or there's probably some Best Buy in there.
13 I labeled it retail because it's a business account, so I
14 would expect to see, you know, more business-type expenses,
15 not personal.

16 Q. Okay. What do you mean by that when you talk about this
17 Retail category?

18 A. Yeah, those are -- those would be like personal
19 expenditures, is what I would categorize them as. I don't
20 remember specifically what's in this account, but it would
21 be, yeah, at like clothing stores, things like that.

22 Q. How much did Abdimajid Nur spend out of his Nur
23 Consulting account at retail establishments between
24 April 2021 and January 2022?

25 A. \$32,747.78.

1 Q. And then there's a category for Hayat Nur?

2 A. Yes.

3 Q. Who is Hayat Nur?

4 A. Hayat Nur is Abdimajid's sister, and she got \$16,500
5 from Nur Consulting.

6 Q. Ms. Roase, I'm directing your attention back to
7 Government Exhibit M-13a, the analysis of the Empire Cuisine
8 & Market's bank accounts. And there's a category that's
9 listed Defendants' Personal Accounts.

10 A. Yes.

11 Q. What does this indicate?

12 A. So these were deposited into a non-business account,
13 basically their personal account for personal expenditures.

14 Q. Whose accounts?

15 A. You'd have to show me, but Abdiaziz Farah.

16 Q. Okay.

17 A. Mohamed Ismail and a few others.

18 Q. Those are the two partners in Empire Cuisine & Market?

19 A. Yes.

20 Q. You mention Mohamed Ismail. Did he receive payments
21 from Empire Cuisine & Market to his personal account?

22 A. Yes, he did. Yes.

23 Q. Was it a significant amount of payments?

24 A. It was significant.

25 Q. And did you obtain records of his bank accounts?

1 A. I did.

2 Q. Did you summarize those accounts during your
3 investigation?

4 A. I did.

5 Q. I want to show you what's been marked, but not yet
6 admitted, as Government Exhibit M-21. What is Government
7 Exhibit M-21?

8 A. M-21 is a combined sources and uses for Mohamed Ismail's
9 personal bank accounts.

10 Q. Okay. And did you create this in a similar manner in
11 which you created the other similar charts?

12 A. Yes, I did.

13 MR. THOMPSON: Your Honor, I would move to admit
14 Government Exhibit M-21.

15 THE COURT: Any objection?

16 M-21 is admitted.

17 BY MR. THOMPSON:

18 Q. All right. Ms. Roase, I'm directing your attention to
19 Government Exhibit M-21, the first page here.

20 Again, can you walk us through the title of this
21 exhibit?

22 A. Yeah. So, again, this is the combined Mohamed J. Ismail
23 bank accounts. These are all the personal bank accounts.

24 And the period of review was May 15th, 2020 -- I tried to
25 mimic the Empire review period -- and I reviewed it through

1 January 31st, 2022.

2 Q. Okay. And how much money was deposited into Mohamed
3 Ismail's personal account during that roughly 18-month
4 period from Empire Cuisine & Market?

5 A. From Empire Cuisine & Market it was \$2,218,515.28.

6 Q. Okay. And how much total went into the account?

7 A. \$2,340,472.46.

8 Q. Did you look into how money was spent from Mohamed
9 Ismail's personal account?

10 A. Yes, I did.

11 Q. What were you looking for?

12 A. I was looking for food.

13 Q. And what did you find?

14 A. I did find some food; however, it was still not
15 significant in terms of how much money was received by
16 Empire Cuisine, but there was still -- I did still find some
17 food. \$51,000 of food.

18 Q. Okay.

19 A. Spent from the personal accounts.

20 Q. Out of the \$2.3 million into the account?

21 A. Yes, that's right.

22 Q. Okay. Could you walk us through most of what you found
23 when you looked at this account?

24 A. Yeah. So I found a lot of foreign transfers. So that
25 totaled 490 -- almost \$494,000. There were payments to

1 other individuals. There were cash withdrawals in the
2 amount of \$171,000. There were a couple vehicle expenses,
3 \$159,000. And then there's some -- there's property
4 expense. That was a payment -- I believe it was a payment
5 to pay off a mortgage loan. That's about, yeah, that's
6 about everything.

7 Q. Okay. So \$493,000 in foreign transfers; is that right?

8 A. Yes.

9 Q. And I think we looked at some of those yesterday; is
10 that right?

11 A. Yes, we did.

12 Q. And, for example, we looked at Government Exhibit O-66,
13 which is one of Mohamed Ismail's personal accounts; is that
14 right?

15 A. Yes, that's right.

16 Q. And where is that at?

17 A. This one is with Wells Fargo.

18 Q. And if I direct your attention to page 431 of this
19 exhibit, do we see an example of one of those foreign
20 transfers?

21 A. Yes. This is one that we looked at yesterday.

22 Q. And what's the amount of the transfer, and who is it to?

23 A. The amount is right here, is \$199,785. And the
24 recipient is this Jiangxi Enda Linen Company. And down here
25 shows the details of the nature of the purchase, which is a

1 purchase of a diesel engine.

2 Q. On page 432 of Government Exhibit O-66, is there another
3 example of Mohamed Ismail transferring money outside the
4 country from his personal account?

5 A. Yes.

6 MR. COTTER: Your Honor, objection. 403. It's
7 cumulative from yesterday.

8 THE COURT: Overruled.

9 BY MR. THOMPSON:

10 Q. Would you briefly describe this one, please?

11 A. Yeah. This one is for \$100,000, and it's the same
12 entity. Jiangxi Enda Linen Company.

13 Q. Okay. Great. And is that entity one we talked about
14 yesterday?

15 A. Yes, it is.

16 Q. And what -- how did it come up yesterday?

17 A. I don't recall.

18 Q. Saw other transfers to that one, I take it?

19 A. Yeah.

20 MR. COTTER: Objection. Leading.

21 THE COURT: Overruled. It will stand.

22 BY MR. THOMPSON:

23 Q. Okay. Back to Government Exhibit M-21. So that's the
24 foreign transfers.

25 You said there's vehicle expenses as well?

1 A. Yes, that's right.

2 Q. How much did Mohamed Ismail spend on cars in that
3 18-month period from April 2020 to January 2022?

4 A. \$159,665.23.

5 Q. Okay. And how much did he withdraw in cash out of his
6 personal account during that 18-month period?

7 A. \$171,272.

8 Q. Are you also familiar with an entity called MZ Market?

9 A. Yes, I am.

10 Q. What is MZ Market?

11 A. That was another entity that was created by Mohamed
12 Ismail.

13 Q. Did you do a similar two-part analysis with this
14 company?

15 A. I did.

16 Q. Starting with the Secretary of State records?

17 A. Yes, that's right.

18 Q. Government Exhibit B-11 is -- page 3 I'm showing you.
19 Could you describe what we're looking at?

20 A. Yeah. So it looks like LegalZoom was used as the
21 organizer, and the name of this entity that was created is
22 MZ Market LLC.

23 Q. And when was MZ Market LLC registered with the Minnesota
24 Secretary of State?

25 A. June 18th, 2021.

1 Q. Okay. Is it significant to you when you look at the
2 Secretary of State records?

3 A. Yes.

4 Q. How so?

5 A. This was created much later, I guess, from when they
6 first started, you know, these defendants started
7 participating in the food program. So I wanted to follow
8 the money. I wanted to know why this entity was created.

9 Q. Did you obtain bank records or records of bank accounts
10 opened in the name of MZ Market?

11 A. Yes.

12 Q. Okay. And I'm showing you what's been admitted as
13 Government Exhibit O-53. Tell you what, did you do a
14 summary chart of the records of MZ Market?

15 A. I did.

16 Q. Okay. And has that been marked as Government
17 Exhibit M-37?

18 A. Yes, that's right.

19 Q. And how did you create this chart?

20 A. So similar to how I did it with the others, this one is
21 also another combined account or sources and uses. I
22 believe there were two MZ Market accounts.

23 Q. And who opened those accounts?

24 A. It was Mohamed Ismail.

25 Q. And does this Government Exhibit M-37 summarize the

1 money into and out of those MZ Market accounts?

2 A. Yes, it does.

3 MR. THOMPSON: Your Honor, I'd move to admit
4 Government Exhibit M-37.

5 THE COURT: Any objection?

6 MR. COTTER: No objection.

7 THE COURT: M-37 is admitted.

8 BY MR. THOMPSON:

9 Q. And, Ms. Roase, could you describe what's shown on this
10 chart here?

11 A. Yeah. So this is the combined MZ Market LLC bank
12 accounts. Again, there were two of them. The combined
13 period of review is when it first opened, which is
14 August 1st, 2021. And the last account that was opened, it
15 closed January 25th, 2023. So I reviewed the entire period
16 that the two accounts were open.

17 Q. Now, this chart is similar to some of the other
18 analyses, bank analysis charts that you've done, correct?

19 A. Yes.

20 Q. But it's a little different?

21 A. It's a little different.

22 Q. How is this one different?

23 A. So this is a similar approach to what I did with
24 ThinkTechAct Foundation, which was split to show, you know,
25 prior to 2019 how -- or I'm sorry -- prior to 2020, you

1 know, the deposits coming in. And then there was a dormant
2 period. Then February 2021, when it started receiving food
3 program money, it was, you know, millions of dollars.

4 So this is kind of done in a similar manner where
5 from the account opening August 1st, 2021, to January 20th,
6 2022, which is when, you know, the case went overt, I guess,
7 and when we did all the search warrants.

8 So I show -- I'm showing the deposits in is
9 \$329,000, but the uses of funds is only \$5,000.

10 Q. Was that significant to you, or what does that mean?

11 A. Yeah, that was significant. I believe -- and you can
12 see from, you know, the first line, the credit card/EBT
13 income, I believe that is income for the market side of
14 Empire. So I believe those are sales, but there's hardly
15 any expenditures.

16 Q. Okay. And this says credit card. What is EBT?

17 A. EBT is food stamp.

18 Q. Okay. And then that's \$189,000 during that five-month
19 period from August 2021 to January 2022; is that right?

20 A. Yes, that's right.

21 Q. And then what's the second largest source of funds into
22 this MZ Market account during that time frame?

23 A. The second largest is Empire Cuisine & Market, \$121,500.

24 Q. And during that time frame there wasn't much spending
25 out of this account?

1 A. There was not.

2 Q. Now, below that you have a second analysis of the
3 account that starts on January 21st of 2021. Could you
4 discuss why you have this broken apart and what you saw?

5 A. Yeah. So, again, after the -- I started this chart with
6 the day after, you know, the search warrants, which is
7 January 21st, 2022, again to account closing, which was in
8 January of '23. So this is about a one-year period.

9 So, again, you can see, you know, the majority of
10 the deposits is credit card and EBT. There's a \$10,000, you
11 know, deposit from Empire Cuisine. Total -- total deposits
12 is 961,000.

13 And then you look at the uses, and there's a lot
14 of food expenses, 551,000. Total expenditures out of this
15 account was \$1.2 million.

16 THE COURT: Mr. Thompson, can you just stop right
17 there for just one moment?

18 MR. THOMPSON: Absolutely.

19 THE COURT: We're going to be off the record.

20 **(Off-the-record discussion)**

21 THE COURT: Back on the record. Go ahead.

22 BY MR. THOMPSON:

23 Q. All right, Ms. Roase. So there was no -- so what
24 happened on January 20th again?

25 A. January 20th was when we did the search warrants.

1 Q. And what happened to the entities -- or the defendants'
2 involvement in the Federal Child Nutrition Program as of
3 January 20th, 2022?

4 A. It stopped.

5 THE COURT: All right. We're going to take a
6 break at this time. We're off the record.

7 **(Off-the-record discussion)**

8 BY MR. THOMPSON:

9 Q. All right, Ms. Roase. Okay. So if I understood you
10 correctly there, the defendants' involvement in the Federal
11 Child Nutrition Program stopped on February 20th of 2022; is
12 that right?

13 A. That's right.

14 Q. So the food expenses after that date were for some other
15 purpose? Is that your conclusion?

16 A. Yes.

17 Q. Okay. All right. I'm directing your attention back to
18 Government Exhibit M-13ah, which is this chart summarizing
19 transfers of money from Empire Cuisine & Market bank
20 accounts to entities controlled by the defendants; is that
21 right?

22 A. Yes.

23 Q. Okay. We talked about MIB Holdings. We talked about
24 Nur Consulting. Empire Gas & Grocery, do you know what that
25 is?

1 A. Yeah, that was what -- I guess the predecessor to Empire
2 Cuisine & Market. That's what it was called. Empire Gas &
3 Grocery.

4 Q. And how would you describe the money into and out of
5 that account from Empire Cuisine & Market?

6 A. Yeah, there's a lot of transfers back and forth. So I
7 would say it's a net of maybe 150,000 going out of the
8 Empire Cuisine account into the Empire Gas & Grocery
9 account.

10 Q. There's a series of other entities. I take it you've
11 done a similar analysis for all these entities?

12 A. Yes.

13 Q. And what were you looking for when you did that?

14 A. I was looking for food expenditures.

15 Q. And did you find any?

16 A. No.

17 Q. Let's -- I want to walk through at least one more here.
18 Wadani Consulting?

19 A. Yes.

20 Q. What's Wadani Consulting?

21 A. That is an entity created by Mukhtar Shariff.

22 Q. And did you -- how much money did Wadani Consulting,
23 Mukhtar Shariff's company, receive from Empire Cuisine &
24 Market?

25 A. \$39,186.

1 Q. And did you investigate that entity?

2 A. I did.

3 Q. Starting with the Secretary of State records?

4 A. Yes.

5 Q. Showing you now what's been admitted as Government
6 Exhibit B-7. This is the articles of incorporation for
7 Wadani Consulting; is that right?

8 A. Yes, that's right.

9 Q. Who created Wadani Consulting?

10 A. It's Mukhtar Shariff.

11 Q. And directing your attention to the second page, when
12 did Mukhtar Shariff create Wadani Consulting?

13 A. January 6th, 2021.

14 Q. Did you investigate whether or not there was a bank
15 account opened in the name of Wadani Consulting?

16 A. Yes, I did.

17 Q. Was there?

18 A. Yes, there was.

19 Q. I'm going to show you what's been admitted as Government
20 Exhibit O-53. Do you recognize Government Exhibit O-53?

21 A. Yes.

22 Q. What is it?

23 A. It is the signature card for the account opening of
24 Wadani Consulting.

25 Q. And in the bottom here, who was the account signer on

1 this account?

2 A. It says Mukhtar Mohamed Shariff.

3 Q. And when was this account opened?

4 A. August 19th, 2021.

5 Q. Actually that's -- this is a W-9, correct?

6 And direct your attention to the second page. Is
7 this actually the account opening document here?

8 A. Actually I think it's both because it says business
9 signature card with substitute W -- form W-9, so.

10 Q. Okay. Page 3, is this the initial bank statement?

11 A. Yeah. Actually -- yeah, I'm sorry, it looks like it was
12 opened earlier than what I said, yeah. It's February 15,
13 2021. That was the initial opening.

14 Q. Okay. Okay. Did you examine this account?

15 A. Yes, I did.

16 Q. Direct your attention to page 136 of this exhibit. Was
17 there an initial deposit into the account after it was
18 opened on February 15th of 2021?

19 A. Yes.

20 Q. Can you tell us about it here on page 136 of Government
21 Exhibit O-53?

22 A. Yeah, there's a check from Empire Cuisine & Market made
23 out to Wadani Consulting for \$25,466. And the memo line
24 says consulting operations.

25 Q. And on page 138, is there a second check from Empire

1 Cuisine & Market to Mukhtar Shariff's company, Wadani
2 Consulting?

3 A. Yes, there is.

4 Q. What's the date on this check?

5 A. This is March 12th, 2021.

6 Q. What's the amount of the check from Empire Cuisine &
7 Market to Wadani Consulting?

8 A. It's \$13,720.

9 Q. What does the memo line state?

10 A. It says consulting.

11 Q. Is there -- I'm showing you now page 145 of this
12 exhibit. What do we see here?

13 A. This is a check now from Empire Enterprises made out to
14 Wadani Consulting.

15 Q. And remind us again, what's Empire Enterprises?

16 A. That's Abdiaziz Farah's entity.

17 Q. Okay. What's the date on this check?

18 A. This is October 12th, 2021.

19 Q. How much is it for?

20 A. \$80,000.

21 Q. What does the memo line say?

22 A. It says project management.

23 Q. Did you examine this account to see how this money was
24 spent?

25 A. Yes, I did.

1 Q. Again, what were you looking for?

2 A. I was looking for food expenditures.

3 Q. Did you find any?

4 A. I did not.

5 Q. I'm going to show you now what's been marked, but not
6 admitted, as Government Exhibit M-31. What's Government
7 Exhibit M-31?

8 A. So this is a sources and uses chart of the Wadani
9 Consulting bank account.

10 Q. And this is created -- did you create this?

11 A. I did create this.

12 Q. In a similar manner to the other summary charts?

13 A. Yes, that's right.

14 MR. THOMPSON: Your Honor, I'd move to admit
15 Government Exhibit M-31.

16 MR. MOHRING: No objection.

17 THE COURT: M-31 is admitted.

18 MR. THOMPSON: Thank you, Your Honor.

19 BY MR. THOMPSON:

20 Q. All right. Ms. Roase, what do we see here?

21 A. Yeah, so this is the summary chart for the Wadani
22 Consulting account. There was only one account, so I have
23 it listed as Bank of America. And the period of review is
24 from the account opening, which is February 16, 2021, and I
25 stopped December 31st, 2021.

1 MR. THOMPSON: Oh, they can't see it.

2 COURTROOM DEPUTY: Sorry.

3 MR. THOMPSON: That's okay.

4 Can we see it now? All right.

5 BY MR. THOMPSON:

6 Q. Okay. So similar chart, Wadani Consulting, Bank of
7 America account.

8 A. Yes.

9 Q. Opening on February 16, 2021.

10 A. Yes.

11 Q. To the end of the year of 2021, correct?

12 A. Yes, that's right.

13 Q. And how much money was deposited into Mukhtar Shariff's
14 Wadani Consulting account over that roughly ten-month
15 period?

16 A. \$482,008.34.

17 Q. Okay. Can you walk us through where that money came
18 from?

19 A. Yeah. So the largest is from Afrique Hospitality Group
20 for \$206,391. Third one down you see Empire Enterprises,
21 \$80,000, which we saw that one check. Empire Cuisine &
22 Market is \$39,186.

23 Q. Did you examine how Mukhtar Shariff spent the money that
24 he deposited into the Wadani Consulting account?

25 A. Yes, I did.

1 Q. And what did you find?

2 A. So what I saw was payments -- there were transfers to
3 his personal accounts right here in the amount of \$63,291.
4 I saw travel expenses for \$41,834. And then on the very
5 top, Nomadic Ventures LLC, exactly \$100,000, that I found to
6 be another entity that Mukhtar had created.

7 Q. Did you find any food purchases, the Federal Child
8 Nutrition Program, in this account?

9 A. I did not.

10 Q. You mentioned the top item here, \$100,000 to Nomadic
11 Ventures LLC.

12 A. Yes.

13 Q. Did you take efforts to track that money to see where it
14 went?

15 A. I did.

16 Q. And what did you find out about Nomadic Ventures LLC?

17 A. It was not for food.

18 Q. I'm showing you what's been admitted as Government
19 Exhibit B-28. Are these the Secretary of State
20 incorporation records for Nomadic Ventures?

21 A. Yes.

22 Q. And who created Nomadic Ventures LLC?

23 A. So the organizers listed are Mukhtar Shariff and Mustaf
24 Shariff.

25 Q. And whose email -- who signed this incorporation form?

1 A. It says it's signed by Mukhtar Shariff.

2 Q. And what -- do you recognize the email that's listed?

3 A. Yes. mshariff34@gmail.com, that is Mukhtar's email.

4 Q. And directing your attention to the second page of this
5 exhibit, when did Mukhtar Shariff create this company
6 Nomadic Ventures LLC?

7 A. September 20th, 2021.

8 Q. After creating the company on September 20th, 2021, did
9 Mukhtar Shariff open an account in the name of Nomadic
10 Ventures LLC?

11 A. Yes, he did.

12 Q. Showing you now what's been admitted -- one second, Your
13 Honor -- as Government Exhibit O-51. Do you see Government
14 Exhibit O-51?

15 A. Yes, I do.

16 Q. What is it?

17 A. This is a signature card for the account opening of
18 Nomadic Ventures LLC.

19 Q. And who are listed as the signatories for this bank
20 account?

21 A. It is Mukhtar Mohamed Shariff and Mustaf M. Shariff.

22 Q. When did they open the account?

23 A. It appears to be October 15, 2021.

24 Q. Actually, on page 2, it looks like there was an original
25 signatory about nine days earlier; is that right?

1 A. Yeah. So it would have meant that this opened
2 October 4th, 2021, with just Mukhtar Mohamed Shariff as the
3 signer and later Mustaf Shariff was added.

4 Q. And did he list a title or his -- with respect to his
5 relationship to Nomadic Ventures LLC?

6 A. Yes, it says manager.

7 Q. And directing your attention to page 82 of Government
8 Exhibit O-51, what do we see here?

9 A. So this is a check from Empire Cuisine & Market LLC made
10 out to Nomadic Ventures LLC for \$80,000.

11 Q. And on page 11 what do we see there?

12 A. This shows there was a deposit of \$100,000 made
13 November 4th. And actually I think it's more of a transfer,
14 not an actual deposit.

15 Q. Is that the transfer from the Wadani Consulting account?

16 A. Yes.

17 Q. Okay. Did you examine this Nomadic Ventures bank
18 account to see whether the \$180,000 that was deposited into
19 it from Wadani Consulting and Empire Cuisine & Market was
20 used to purchase food?

21 A. I did.

22 Q. Was it?

23 A. No, it was not.

24 Q. All right. Ms. Roase, I want to switch gears here for a
25 second. We've done a lot of money chasing. Let's take a

1 break from that for a moment. Okay?

2 A. Okay.

3 Q. Well, let me -- before I close -- let me close the loop
4 on that a little bit.

5 We've gone through a lot of bank accounts here
6 today, correct?

7 A. Yes.

8 Q. Different accounts opened in the names of various LLCs?

9 A. Yes.

10 Q. How many bank accounts did you analyze with respect to
11 this case?

12 A. It was over 300.

13 Q. Just for these defendants?

14 A. Just for these defendants.

15 Q. And what were you looking for when you found -- when you
16 analyzed those accounts?

17 A. I was looking for food expenditures. There were, again,
18 a lot of transfers to other entities that were not, you
19 know, evident, you know, that it was actually food
20 purchases. It wasn't like, you know, a check to Sysco or,
21 you know, something like that that would be obvious that it
22 was food.

23 And so I just kept subpoenaing those records, and
24 I just kept following the money and going down those -- that
25 path looking for food.

1 Q. Through 300 different bank accounts?

2 A. Yes.

3 Q. Okay. So let's -- I want to talk about another topic
4 here. Okay?

5 A. Okay.

6 Q. Dar Al-Farooq.

7 A. Okay.

8 Q. Are you familiar with the Dar Al-Farooq --

9 A. Yes.

10 Q. -- in this investigation?

11 A. Yes.

12 Q. How so?

13 A. It was a food distribution site.

14 Q. And I want to start with Government Exhibit C-94. This
15 is some of the CLiCS data; is that right?

16 A. Yes, it is.

17 Q. For this site?

18 A. Yes.

19 Q. Okay. Can you tell us about, based on CLiCS, when a
20 site was first opened at Dar Al-Farooq?

21 A. Yeah. It would have been opened sometime in 2020. This
22 is a vended meal contract.

23 Q. Okay. And what's the site called back in -- well, turn
24 your attention to the date on this one. What's the date of
25 this meal contract?

1 A. It's September 8, 2020.

2 Q. Okay. And what was the site called back at that time?

3 A. So it says NAYSE - Dar Al-Fardooq.

4 Q. And what is that?

5 A. I believe -- well, there's a couple typos in there. I
6 think it means Dar Al-Farooq without the D. But also the
7 NAYSE is supposed to be NAYSC.

8 Q. What does that stand for?

9 A. It stands for New American Youth Soccer Club.

10 Q. And so this site was -- it first opened back in
11 September of 2020?

12 A. Yes, that's right.

13 Q. Okay. And what happened after it was opened in
14 September 2020, according to the CLiCS data?

15 A. There were no claims. So this never happened, I guess,
16 in 2020. There were no claims for Dar Al-Farooq.

17 Q. When you say there was "no claims," what do you mean?

18 A. There were no claims submissions that were entered into
19 CLiCS.

20 Q. I'm going to direct your attention now to Government
21 Exhibit C-97. And what are we looking at here?

22 A. Yeah, so this is the CLiCS application data.

23 Q. Okay. And the site address -- well, the site program
24 name listed, what is that?

25 A. Yeah, so it says NAYSC - Dar Al-Fardooq.

1 Q. Okay. And then what's the address listed?

2 A. The address is 8201 Park Avenue South, Bloomington,
3 Minnesota.

4 Q. What's the date range for this application?

5 A. September 2020 through April 2021.

6 Q. Now, you said when it was called New American Youth
7 Soccer there was no claims submitted?

8 A. There was no claims submitted.

9 Q. Did that change at some point? Did this site change?

10 A. Yes, it did. It was then transferred out of -- I think
11 the vendor contract was with Hilltop. It was transferred
12 out of that name and into someone else's.

13 Q. Okay. And what entity did it get transferred to?

14 A. So it became this long name, Dar Al-Farooq Islamic
15 Center/ThinkTechAct.

16 Q. So one of the oddities, and this came up earlier in the
17 trial, is this site application here, the program name
18 listed down here is NAYSC Dar Al-Farooq starting in
19 September 2020.

20 A. Yes.

21 Q. But up above it has the site ID number, and it lists
22 ThinkTechAct.

23 MR. MOHRING: Objection. Foundation, Your Honor.

24 THE COURT: Overruled.

25 You may answer.

1 BY MR. THOMPSON:

2 Q. Do you know what's going on there?

3 A. Yes. So I have seen an earlier version of this CLiCS
4 data.

5 So this line item is live, meaning if it -- a site
6 name, it can change. And so if, you know, say, the sponsor
7 or MDE, I don't know who actually does it, but if they
8 change the name of the site, the -- even the old CLiCS
9 applications, when you go, you know, try and pull it from
10 the past, which is again September 2020, it shows --

11 MR. MOHRING: Objection, Your Honor. Foundation.

12 THE COURT: Can you lay more foundation?

13 BY MR. THOMPSON:

14 Q. Do you know how this works?

15 A. Yes, I do.

16 Q. Okay.

17 MR. MOHRING: How?

18 BY MR. THOMPSON:

19 Q. How do you know how it works?

20 A. Because I've seen the original.

21 Q. Okay.

22 A. So, yeah, so, again, the original, it did not have
23 ThinkTechAct. It just, it was just Dar Al-Farooq Islamic
24 Center.

25 So when it actually changed to this ThinkTechAct,

1 it was actually, I believe, later in 2021.

2 Q. Okay. All right. So this site ID right -- that's the
3 site ID, this long number?

4 A. Yes, it is.

5 Q. And that's the live portion that changes retroactively?

6 A. Yes, the site number didn't change, but the name behind
7 that can change.

8 Q. Okay. Again, going back to C-94, this is the vended
9 meal contract for September of 2020, correct?

10 A. Yes.

11 Q. And, again, what's the site name there?

12 A. This says NAYSE - Dar Al-Fardooq.

13 Q. And who's the -- what's the vendor that's listed on this
14 contract?

15 A. The vendor is Hilltop Grocery and Meat Market.

16 Q. Okay. And showing you -- directing your attention to
17 C-101, does that later change?

18 A. Yes, the vendor does change.

19 Q. And who does it change to?

20 A. It changes to Empire Cuisine & Market.

21 Q. And C-102, is there also another vendor --

22 A. Yes.

23 Q. -- contract?

24 A. Yes.

25 Q. What vendor contract has been admitted as Government

1 Exhibit C-102?

2 A. This one shows Afrique Hospitality Group.

3 Q. And what's the site name that Afrique Hospitality Group
4 is vending for?

5 A. Dar Al-Farooq.

6 Q. And what sponsor is listed for this site?

7 A. Feeding Our Future.

8 Q. Thank you.

9 On the CLiCS data, you said there was no claims at
10 first and then there was a lot of claims in 2021; is that
11 right?

12 A. That's right.

13 Q. I'm going to show you what's been marked, but not
14 admitted, as Government Exhibit N-24. Do you recognize
15 Government Exhibit N-24?

16 A. Yes.

17 Q. What is it?

18 A. So this is the meals that were submitted to MDE and
19 claimed for the Dar Al-Farooq site.

20 Q. And what information is this summarizing, and where does
21 it come from?

22 A. This comes from the MDE CLiCS database.

23 Q. And does this summarize that voluminous data?

24 A. Yes, it does.

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

1 Government Exhibit N-21.

2 MR. MOHRING: No objection.

3 THE COURT: This is N-24?

4 MR. THOMPSON: I'm sorry. N-24.

5 THE COURT: N-24 is admitted.

6 MR. THOMPSON: Thank you, Your Honor.

7 BY MR. THOMPSON:

8 Q. All right. Ms. Roase, we looked at these in an earlier
9 portion of the trial, and I don't want to go backwards, but
10 can you just remind us what's depicted in this kind of
11 chart?

12 A. Yeah. So this is a summary of what the CLiCS data shows
13 in terms of number of meals claimed, and this is specific to
14 the Dar Al-Farooq site.

15 Q. And this chart starts in January 2021. Why does it
16 start then and not back in September of 2020?

17 A. Because there were no claims in 2020. The first claims
18 were in January of '21.

19 Q. All right. And what can you tell us about the nature of
20 the claims in January of 2021 when the site first opened at
21 Dar Al-Farooq?

22 A. So they started claiming CACFP meals. So 62,000
23 after-school snacks, 60,200 suppers, and the average daily
24 attendance was 2,000 over a 31-day period.

25 Q. 2,000 kids getting both snacks and suppers every day?

1 A. Yeah.

2 MR. MOHRING: Objection. Misstates the evidence.

3 THE COURT: Overruled. The jury will decide what
4 the evidence states.

5 BY MR. THOMPSON:

6 Q. What does it indicate, Ms. Roase?

7 A. It indicates that 2,000 kids received some sort of meal
8 every single day, either after-school snack or supper or
9 both.

10 Q. How about February 2021, the second month of the
11 Dar Al-Farooq's involvement in the Federal Child Nutrition
12 Program?

13 A. So it looks like there's an increase. Now there's the
14 daily attendance is 3,500 over all 28 days in February for
15 98,000 snacks and 98,000 suppers.

16 Q. March of 2021?

17 A. Yeah. So, again, it's attendance of 3500 every day in
18 March, for 108,500 after-school snacks and 108,500 suppers.

19 Q. Similar numbers continue throughout the 2021 year
20 through November; is that correct?

21 A. That's right.

22 Q. The total number of meals that were claimed to be served
23 at the Dar Al-Farooq site between January and November of
24 2021?

25 A. Yeah, so for the 11-month period there were total claims

1 of 830,249 after-school snacks, 828,449 suppers, and then
2 142,340 breakfasts and lunches, for a total of 1,943,378
3 meals.

4 Q. And this is based on the CLiCS data; is that right?

5 A. That's right.

6 Q. During the investigation did you look at the underlying
7 meal counts that were submitted to the sponsor supporting
8 these claims?

9 A. Yes, I did.

10 Q. I'm going to show you what's been admitted as Government
11 Exhibit C-361. And is this a file that was recovered during
12 a search of Feeding Our Future?

13 A. Yes, this is a scanned version of the original envelope.

14 Q. And what is the envelope titled here at the top of
15 page 1?

16 A. It says FY21 Dar Al-Farooq, in parenthesis, (AS/SFSP),
17 which is I believe after-school.

18 Q. What does "FY" typically stand for?

19 A. Fiscal year.

20 Q. All right. And on page 2 there's some meal counts; is
21 that right?

22 A. Yes.

23 Q. Could you describe the meal counts at the bottom of
24 page 2?

25 A. Yeah. So this shows that the sponsor is Partners in

1 Quality Care, the site is for Dar Al-Farooq. And the
2 first -- I don't know if this is the first week, but it's
3 from January 3rd through January 9th of 2021 2,000 meals
4 every day was claimed.

5 Q. Okay. And that continues throughout the month of
6 January 2021; is that right?

7 A. Yes, that's right.

8 Q. Is that consistent with the claims submitted in CLiCS?

9 A. Yes.

10 Q. I'd like to show you now what's been admitted as
11 Government Exhibit C-360. Is this another file that was
12 recovered during the search of Feeding Our Future?

13 A. Yes, it is.

14 Q. And how is it labeled?

15 A. So on the left, Dar Al-Farooq. There's check marks next
16 to meal count, menu and receipts. And on the right it looks
17 like a little sticky note, Dar Al-Farooq, February 2021,
18 menu, receipts.

19 Q. Directing your attention to page 5, do we see more meal
20 counts for the Dar Al-Farooq site?

21 A. Yes.

22 Q. And what's the sponsor name listed here?

23 A. It says Mind Foundry.

24 Q. And the site name?

25 A. The site name is Dar Al-Farooq.

1 Q. And what are the claims that are submitted here?

2 A. It shows 3500 meals every day.

3 Q. What kind of meals?

4 A. Snacks and supper.

5 Q. And what's -- whose name is listed after signature of
6 site supervisor?

7 A. It says Abdimajid.

8 Q. Did you also look at invoices that were submitted to
9 Feeding Our Future for meals purportedly served at the
10 Dar Al-Farooq site?

11 A. Yes.

12 Q. I would like to show you what's been marked, but not yet
13 admitted, as Government Exhibit C-330. Do you recognize
14 Government Exhibit C-330?

15 A. Yes, I do.

16 Q. Is this an email that was obtained during the --
17 pursuant to a search warrant for Abdimajid Nur or Abdiaziz
18 Farah's gmail account?

19 A. Yes.

20 MR. THOMPSON: Your Honor, I'd move to admit
21 Government Exhibit C-330.

22 THE COURT: Any objection?

23 C-330 will be conditionally admitted.

24 MR. THOMPSON: Thank you, Your Honor.

25

1 BY MR. THOMPSON:

2 Q. Ms. Roase, can you describe this email?

3 A. Yeah, so it's from Abdi Nur to Abdiaziz Farah. The
4 subject is Feeding Our Future. And it was sent May 7th,
5 2021. The attachment appears to be an Excel document called
6 Feeding Our Future Invoice.

7 Q. And directing your attention to the second page, what do
8 we see here?

9 A. So this is an invoice from ThinkTechAct Foundation made
10 out to Feeding Our Future. The project says CACFP sites.
11 And under the description it lists three sites, the
12 Dar Al-Farooq, Al-Madinah and 1506 Southcross.

13 Q. And what's the total amount that ThinkTechAct is
14 invoicing Feeding Our Future for meals provided at these
15 three sites?

16 A. \$810,750.

17 Q. I'm showing you now what's been admitted as Government
18 Exhibit C-345. Could you describe this email?

19 A. This one, it says it's from Abdimajid Nur to mshariff34,
20 which is Mukhtar Shariff's email. The subject is FOF claims
21 and invoice. And it's dated October 20th, 2021.

22 Q. And directing your attention to the second page of this
23 exhibit, what do we see?

24 A. This is a meal count sheet for Dar Al-Farooq from
25 September 1st to September 3rd.

1 Q. And how would you describe the meal counts listed here?

2 A. So it shows 3500 meals Wednesday, Thursday and Friday.

3 Q. And on page 3 there's a document titled Summer Food
4 Service Program Site Delivery Receipt. Could you describe
5 it?

6 A. Yeah. So this also shows the date as -- for
7 September 1st through September 3rd. The number of meals
8 shipped or produced on the left side is 3500 breakfasts,
9 3500 lunches. And the number of meals received at the site
10 was 3500 breakfasts and 3500 lunches.

11 Q. I'm showing you now what's been admitted as Government
12 Exhibit C-346. Do you see this email?

13 A. Yes.

14 Q. Who sent this email?

15 A. Mukhtar Shariff did.

16 Q. Who did he send it to?

17 A. He sent it to claims@feedingourfuturemn.org.

18 Q. Do you recognize that email address?

19 A. Yes. The claims@feedingourfuture, that's where all the
20 claims submissions are supposed to be emailed to.

21 Q. Claims for reimbursement under the Federal Child
22 Nutrition Program?

23 A. Yes.

24 Q. Did Mukhtar -- was someone blind copied on this?

25 A. Yes. That would be Abdimajid Nur's email.

1 Q. What's the subject line of Mukhtar Shariff's email to
2 Feeding Our Future?

3 A. It says claims and invoice, September 2021.

4 Q. And what's the date he sent this email?

5 A. October 21st, 2021.

6 Q. There are a series of attachments; is that right?

7 A. Yes.

8 Q. First on page 2, more meal counts?

9 A. Yes. It appears to be exactly the same as what we saw
10 earlier.

11 Q. Okay. And then on page 3 of this email from Mukhtar
12 Shariff to Feeding Our Future, same site delivery receipt?

13 A. This is the same.

14 Q. Then they continue on 4, 5, 6, more meal counts?

15 A. Yes.

16 Q. Then there's meal counts for other sites; is that
17 correct?

18 A. Yes, it showed -- I saw Medford and Waseca.

19 Q. Starting on page 13 of Government Exhibit C-346, this
20 email from Mukhtar Shariff to Feeding Our Future, what do we
21 see?

22 A. This looks like it's a roster for Dar Al-Farooq.

23 Q. I'm going to skip down to page 39 of this exhibit. Does
24 this contain some of the -- we had testimony about those
25 rosters I think last week; is that right?

1 A. Yes, that's right.

2 Q. Does this roster contain some of the names that were
3 discussed during that testimony?

4 A. Yes. Angel Albino was mentioned.

5 Q. How about on page 107 here? Do you recognize the name
6 Britishy Melony?

7 A. Yes.

8 Q. How so?

9 A. That was testified earlier in this trial. That is a
10 fake name.

11 Q. One of the names that appeared on many, many lists?

12 A. Yes.

13 Q. On page 143, did Mukhtar Shariff include an invoice in
14 this email he sent to Feeding Our Future in October of 2021?

15 A. Yes.

16 Q. Could you describe the invoice that he submitted?

17 A. Yeah. So it's a ThinkTechAct Foundation invoice for
18 Feeding Our Future. Project says CACFP, and it lists three
19 sites.

20 Q. What are the three sites?

21 A. They are Dar Al-Farooq, Waseca and Medford.

22 Q. What's the total amount of the invoice that Mukhtar
23 Shariff submitted to ThinkTechAct -- or I'm sorry -- to
24 Feeding Our Future?

25 A. \$489,468.85.

1 Q. I'm going to show you one more here. This is Government
2 Exhibit C-353. Could you describe this email?

3 A. This is from Abdimajid Nur to Mukhtar Shariff's email,
4 and copied is Mahad Ibrahim. Subject line is DFC billing,
5 and it's dated January 3rd, 2022.

6 Q. And does this contain, on page 80, similar meal counts
7 for the Dar Al-Farooq Feeding Our Future site?

8 A. Yes. This is for one of the weeks in December of 2021.

9 Q. Could you describe the meal counts submitted for this
10 week?

11 A. Yeah. So it looks like it's 3,464 every day of the
12 week.

13 Q. And whose signature appears after site supervisor?

14 A. It states Abdimajid.

15 Q. And on page 82, is there an invoice that was submitted
16 to Feeding Our Future in this email from Abdimajid Nur to
17 Mukhtar Shariff?

18 A. Yes.

19 Q. On January 3rd of 2022?

20 A. Yes.

21 MR. MOHRING: Objection, Your Honor. Misstates
22 the evidence.

23 THE COURT: Again, the jury will decide the
24 evidence. The objection is overruled.

25

1 BY MR. THOMPSON:

2 Q. Could you describe the invoice?

3 A. So this one, instead of saying ThinkTechAct, it says
4 Afrique Hospitality Group on the top. It's actually --
5 yeah, it's an invoice for ThinkTechAct Foundation. And the
6 description is Dar Al-Farooq.

7 Q. So take me through this. This invoice is a little
8 different than the other one?

9 A. Yes. The other one was a ThinkTechAct Foundation to
10 Feeding Our Future.

11 Q. Who is invoicing who?

12 A. This one is Afrique invoicing ThinkTechAct.

13 Q. They're asking for money from ThinkTechAct?

14 A. Yes.

15 Q. How much?

16 A. \$434,822.85.

17 Q. What for?

18 A. It's for 97,713 meals provided at Dar Al-Farooq.

19 Q. And, again, who sent this email to who on January 3rd,
20 2022?

21 A. It's Abdimajid Nur to Mukhtar Shariff's email, and Mahad
22 Ibrahim is copied.

23 Q. Ms. Roase, we looked earlier at a summary of the CLiCS
24 data showing all the meals that were claimed for
25 reimbursement at the Dar Al-Farooq site.

1 A. Yes.

2 Q. Did you also create a similar chart showing all the
3 dollars or the money claimed for reimbursements for meals
4 purportedly served at the Dar Al-Farooq site?

5 A. Yes, I did.

6 Q. I'm going to show you what's been marked, but not yet
7 admitted, as Government Exhibit N-24. Is this that chart?

8 A. No. This is the -- this is the meals claimed.

9 Q. N-25?

10 A. Yes.

11 Q. Okay. Does this summarize the otherwise voluminous
12 CLiCS data?

13 A. Yes.

14 MR. THOMPSON: Your Honor, I'd move to admit
15 Government Exhibit N-25.

16 THE COURT: Any objection?

17 MR. COTTER: No objection, Your Honor.

18 THE COURT: N-25 is admitted.

19 BY MR. THOMPSON:

20 Q. Ms. Roase, could you take us through this chart?

21 A. Yeah. So similar to Exhibit N-24, which was the meals
22 claimed for Dar Al-Farooq, this is the dollar amounts for
23 Dar Al-Farooq from January 2021 through November of 2021.

24 Q. And let's -- January 2021 was the first month that the
25 site was involved in the Federal Child Nutrition Program?

1 A. Yes.

2 Q. How much in claims were submitted for that month?

3 A. It is for a total of \$285,571.

4 Q. How about February 2021, the second month?

5 A. February is \$462,070.

6 Q. March 2021?

7 A. \$511,577.50.

8 Q. Similar numbers continue for most of 2021 through
9 November?

10 A. Yes, it does.

11 Q. And why is there no December claims? We saw an invoice
12 for December.

13 A. I -- I believe it was never entered into CLiCS.

14 Q. Why is that? When are CLiCS -- when are claims
15 typically submitted in this program?

16 A. They're usually submitted a month later.

17 Q. Did something prevent the December 2021 claims from
18 being submitted?

19 A. There was a stop payment issued.

20 Q. Because of? What happened in January 2022?

21 A. Our -- we had performed search warrants on January 20th,
22 2022.

23 Q. Okay. What's the total amount of Federal Child
24 Nutrition Program funds that were claimed from MDE in --
25 between January and November of 2021 for meals purportedly

1 served at the Dar Al-Farooq site?

2 A. So this correlates to the 1.9 million meals that we saw
3 on the prior chart. This is for \$4,919,342.18.

4 Q. How does that compare to the other sites involved in
5 this, this group of defendants, the 50 that we've talked
6 about?

7 A. Of the 50 sites, this is the largest.

8 Q. Directing your attention back to page 82 of Government
9 Exhibit C-53, which is this invoice from Afrique Hospitality
10 Group to ThinkTechAct Foundation. Do you see that?

11 A. Yes.

12 Q. I want to ask you a little bit about Afrique Hospitality
13 Group. Okay?

14 A. Okay.

15 Q. What is it?

16 A. It is, I guess, an event center that was created,
17 constructed in 2021.

18 Q. How did it get on your radar, so to speak?

19 A. So I -- I would say it's because I was following the
20 money from ThinkTechAct Foundation and Empire Cuisine, I
21 noticed that there were payments to this Afrique Hospitality
22 Group from those two entities.

23 Q. I turn your attention back to Government Exhibit M-30.
24 And this is the chart summarizing the money into and out of
25 the ThinkTechAct Foundation account; is that right?

1 A. Right.

2 Q. And, again, here on the left we see more than
3 \$18 million from Partners in Nutrition and 3.7 million from
4 Feeding Our Future?

5 A. Yes.

6 Q. And looking on the use of the funds, more than
7 \$15 million went to Empire Cuisine & Market and Empire
8 Enterprises, correct?

9 A. Yes.

10 Q. And then setting aside the account seizure, what's the
11 entity that gets the most money after Empire Cuisine &
12 Market and Empire Enterprises from ThinkTechAct?

13 A. It's Afrique Hospitality Group for \$1,783,583.90.

14 Q. You said that Afrique Hospitality Group also received
15 money from Empire Cuisine & Market?

16 A. Yes, it did.

17 Q. Showing you Government Exhibit M-13a. Is this the chart
18 summarizing the money into and out of the Empire Cuisine &
19 Market bank accounts?

20 A. Yes.

21 Q. And a lot of food money going into the accounts?

22 A. Yes.

23 Q. How much money did Empire Cuisine & Market send to
24 Afrique Hospitality Group between May of 2020 and April of
25 2022?

1 A. \$834,546.

2 Q. Were there other entities in this scheme that sent money
3 to Afrique Hospitality Group?

4 A. Yes.

5 Q. Yesterday we talked about a group called -- or an entity
6 called St. Cloud Somali Athletic Club; is that right?

7 A. Yes, that's right.

8 Q. I'm directing your attention to Government Exhibit M-27.
9 What do we see here?

10 A. Yeah, so this is the one where I noticed that, you know,
11 other than the, you know, possibly interest payments coming
12 in of 19.98, the only other source of income was food
13 nutrition money from Partners in Nutrition. \$562,185.50.
14 And what went out was exactly 95 percent of -- to Bushra
15 Wholesalers and Afrique Hospitality Group.

16 Q. How much did Afrique Hospitality Group receive from
17 St. Cloud Somali Athletic Club in 2021?

18 A. \$260,820.

19 Q. After you saw those significant payments to Afrique
20 Hospitality, did you dig into the origins of that company?

21 A. I did.

22 Q. I'm going to show you what's been admitted as Government
23 Exhibit B-8, specifically page 3.

24 Is this the articles of organization for Afrique
25 Hospitality Group?

1 A. Yes, it is.

2 Q. And who is listed as the organizer?

3 A. It's someone named Mahad Omar.

4 Q. And what email is listed on this account?

5 A. The email listed is Mukhtar Shariff's email. It's
6 mshariff34@gmail.com.

7 Q. Directing your attention to page 2 of Government
8 Exhibit B-8, when was Afrique Hospitality Group registered
9 with the Minnesota Secretary of State?

10 A. January 6, 2021.

11 Q. Thank you.

12 I'm going to direct your attention now to
13 Government Exhibit G-110. Do you see Government
14 Exhibit G-110?

15 A. Yes, I do.

16 Q. And it's an email; is that right?

17 A. Yes, it is.

18 Q. Who is sending the email to who?

19 A. Mahad Ibrahim is sending the email to Mukhtar Shariff.

20 Q. And what's the subject line of this email?

21 A. It says Pitch Link and, in parentheses, (need to add
22 financials but ran out of energy tonight).

23 Q. When does Mahad Ibrahim send this pitch link to Mukhtar
24 Shariff?

25 A. December 31st, 2020.

1 Q. And how does that relate to the creation of the company?

2 A. This is six days prior.

3 Q. And I'm directing your attention to the second page --
4 or the first page of this PowerPoint presentation. Is that
5 what it is?

6 A. Yes, it is.

7 Q. And what's the PowerPoint presentation titled?

8 A. It says, "Afrique, Where Minnesota Meets Africa."

9 Q. And there's a mission statement for this organization?

10 A. Yes.

11 Q. What does it state?

12 A. It says, "Promote African culture, community and
13 economic empowerment through innovative cuisine and
14 experiences."

15 Q. On page 4 -- well, what do we see here on page 4 of
16 Government Exhibit 110?

17 A. It looks like this is the revenue model, which talks
18 about how they would be accumulating revenue and profits.
19 There's catering and events, there's restaurant, there's
20 food service.

21 Q. Okay. And those are the sort of business -- lines of
22 business for this proposal; is that correct?

23 A. Yes.

24 Q. Proposed entity?

25 A. Yes.

1 Q. And then on the left here on page 4 there's -- it states
2 Revenue Model; is that right?

3 A. Right.

4 Q. What does it say after that?

5 A. It says, "Hedge risk and volatility of hospitality
6 business with large, consistent revenues from food service
7 contracts (CACFP and SFSP)."

8 Q. What is the CACFP?

9 A. It's the Child and Adult Care Food Program.

10 Q. And the SFSP?

11 A. Summer Food Service Program.

12 Q. And then going through there, there's continued
13 descriptions of the proposed businesses in the Afrique
14 Center; is that correct?

15 A. Right, yes.

16 Q. On page 6, what's it titled?

17 A. It says it's for "The Restaurant. Fast Casual Service."
18 Is that where you're looking at?

19 Q. Yep. And then page 7?

20 A. The Event Center. It says, "3,000-plus square foot of
21 event space."

22 Q. Page 8?

23 A. "Catering. Over 40 large companies within ten miles of
24 venue."

25 Q. It talks about the average corporate catering order?

1 A. Yeah. It's over \$1500.

2 Q. And then on page 9 it says Food Service. And what does
3 it say here on Food Service?

4 A. It says, "2500 kids daily worth of food service
5 contracts using CACFP and SFPS."

6 Q. And what does it say -- there's some bullet points after
7 that. What does the first bullet point say?

8 A. It says, "Federal program with regular reimbursement for
9 food provided."

10 Q. And the second bullet point?

11 A. "Targeted all in cost of delivery \$2.78 and \$3.69
12 inclusive of profit margin."

13 Q. The third bullet point talks about revenues; is that
14 right?

15 A. Yes, it does.

16 Q. What does it say about revenues from the Child and Adult
17 Care Food Program and Summer Food Service Program?

18 A. It says, "Consistent revenues to cover core overhead and
19 staffing costs, reducing pressure on other outlets."

20 Q. Now, Afrique ended up being involved in the Federal
21 Child Nutrition Program; is that right?

22 A. Yes, that's right.

23 Q. And what was its role?

24 A. It was a vendor; and not only that, but a food supplier
25 to other entities.

1 Q. Including the Dar Al-Farooq site?

2 A. Yes.

3 Q. And others?

4 A. And others.

5 Q. After you identified Afrique as receiving all this
6 money, did you look into its bank accounts?

7 A. Yes, I did.

8 Q. I show you what's been admitted as Government
9 Exhibit O-20. What is Government Exhibit O-20?

10 A. This is the bank signature card for Afrique Hospitality
11 Group.

12 Q. And who are listed as the signatories on the account as
13 of January 19th, 2021?

14 A. So there's five individuals listed. There's Mukhtar
15 Mohamed Shariff, Raaho Abshir Adan, Solekha F. Hassan,
16 Mohamed M. Omar and Mahad Ibrahim.

17 Q. And you recognize Mahad Ibrahim, of course?

18 A. Yes.

19 Q. And who is he related to this case?

20 A. He is ThinkTechAct Foundation, Mind Foundry and MIB
21 Holdings.

22 Q. Did you conduct a similar bank analysis of the Afrique
23 Hospitality Group account that was opened in January of
24 2021?

25 A. Yes, I did.

1 Q. What were you looking for?

2 A. I was looking for food purchases.

3 Q. Did you create a chart summarizing the activity in that
4 account?

5 A. Yes.

6 Q. I'm going to show you what's been marked, but not
7 admitted, as Government Exhibit M-6. Do you see Government
8 Exhibit M-6?

9 A. Yes.

10 Q. What is it?

11 A. Yeah. So this is a sources and uses chart of the
12 Afrique Hospitality Group bank account at Bank of America.

13 Q. Okay. And did you create this in a similar manner in
14 which you created the other accounts?

15 A. Yes, I did.

16 MR. THOMPSON: Your Honor, I'd move to admit
17 Government Exhibit M-6.

18 MR. MOHRING: No objection, Your Honor.

19 THE COURT: M-6 is admitted.

20 BY MR. THOMPSON:

21 Q. Starting at the top here?

22 A. Yeah. The bank account name is Afrique Hospitality
23 Group LLC. Bank account is at Bank of America. Period of
24 review is from the account opening, which is January 7,
25 2021, through June 14, 2022.

1 Q. And let's first look at the funds that were deposited
2 into the Afrique Hospitality Group account. Okay?

3 A. Okay.

4 Q. How much during that little less than 18-month period,
5 how much money was deposited into the account?

6 A. \$6,807,854.72.

7 Q. And can you take us through the sources of that money,
8 where it came from?

9 A. Yeah. So the top there, that's ThinkTechAct Foundation,
10 \$1,783,583.90.

11 Then the next group is -- I have it categorized as
12 Other Food Program Income, which is \$1.3 million.

13 There's also direct checks from Feeding Our Future
14 to Afrique. That is \$1,150,523.55.

15 There were also investors in Afrique, which is
16 what that investment income is. It's \$886,000.

17 The next one you see, the Empire Cuisine & Market
18 and Empire Enterprises, 834,000.

19 And then the one below that is the St. Cloud
20 Somali Athletic Club that we saw earlier for \$260,820.

21 Q. So a lot of familiar names there; is that right?

22 A. Yes.

23 Q. Let's start with the first one, ThinkTechAct Foundation.
24 Okay?

25 A. Okay.

1 Q. How much money did ThinkTechAct Foundation send to
2 Afrique Hospitality Group?

3 A. Over \$1.7 million.

4 Q. And did you look at the bank account to see what that
5 money was for?

6 A. Yeah. The checks coming in I think referenced CACFP
7 food.

8 Q. All right. And I'll direct your attention back to
9 Government Exhibit O-20, which is that -- the Afrique
10 Hospitality account at Bank of America, correct?

11 A. Yes.

12 Q. Let's look at a couple of examples.

13 Is page 193 an example of one of the checks --
14 sorry, page 192 -- from ThinkTechAct Foundation to the
15 Afrique Hospitality Group?

16 A. Yes.

17 Q. Can you describe the check for the record?

18 A. Yeah. It's, yeah, so it's a check from ThinkTechAct
19 Foundation to Afrique Hospitality Group for \$94,440 dated
20 March 28th, 2021. Memo line says CACFP food.

21 Q. And moving up to page 200, is there another check from
22 ThinkTechAct Foundation to Afrique Hospitality Group?

23 A. Yes.

24 Q. What's the date on that check?

25 A. It's April 3rd, 2021.

1 Q. What's the amount of the check?

2 A. \$89,990.

3 Q. What does the memo line say?

4 A. CACFP food.

5 Q. Did the other checks from ThinkTechAct Foundation to
6 Afrique Hospitality Group look similar in terms of amounts
7 and memo lines?

8 A. Yes.

9 Q. Going back to Government Exhibit M-6, I want to skip the
10 Other Food Program Income line for a second and move down to
11 Feeding Our Future.

12 How much did Afrique Hospitality Group receive
13 from Feeding Our Future during 2021 and the early part of
14 2022?

15 A. Over \$1.1 million.

16 Q. And did you look to those checks to see what they were
17 for?

18 A. I did.

19 Q. And back to Government Exhibit O-20, page 233, what do
20 we see about the checks?

21 A. Yeah. So it's a Feeding Our Future check to -- made out
22 to Afrique. It says \$184,869.

23 Q. What's the date on this one?

24 A. It's August 13th, 2021.

25 Q. And page 257, similar check from Feeding Our Future?

1 A. Yes.

2 Q. How much is this one, and when was it written? When was
3 this check written to Afrique from Feeding Our Future?

4 A. It's dated October 8th, 2021, for \$625,947.

5 Q. And page 244 from Government Exhibit O-20.

6 A. Yeah, it's a Feeding Our Future check made out to
7 Afrique Hospitality Group.

8 Q. What's the amount and date?

9 A. It's \$275,132.55 on August 13th, 2021.

10 Q. And what does the memo line say?

11 A. It says July Southcross.

12 Q. What's Southcross?

13 A. Southcross was a food distribution site.

14 Q. So we saw an invoice earlier. Here's another one from
15 Bushra Wholesalers on page 245; is that right?

16 A. Yes.

17 Q. Do you recognize Bushra Wholesalers?

18 A. Yes. That is Said Farah and Abdiwahab Aftin's entity.

19 Q. And how much did they write a check to Afrique
20 Hospitality for on June 1st, 2021?

21 A. It says \$69,396, and the memo line says groceries.

22 Q. Okay. We looked earlier at the invoices that were
23 submitted by Afrique Hospitality; is that right?

24 A. Yes.

25 Q. And what sites did they relate to?

1 A. It was -- Dar Al-Farooq was the big one, and there were
2 two others, Medford and Waseca.

3 Q. Okay. Did Dar Al-Farooq receive payments from other
4 entities that were involved in the Federal Child Nutrition
5 Program funds that operated -- or purported to operate other
6 sites?

7 A. Yes.

8 Q. And directing your attention back to Government
9 Exhibit M-6, are those entities listed under Other Food
10 Program Income?

11 A. They are.

12 Q. Can you generally describe what you -- what this
13 category relates to?

14 A. Yeah. So these other entities, they also participated
15 in the Federal Child Nutrition Program. And they received
16 claims or -- yeah, for food money through -- I want to say
17 they were all Feeding Our Future sites.

18 Q. Okay. And they wrote checks to Afrique?

19 A. Yes, they did.

20 Q. As did these two down here, Empire Cuisine & Market,
21 Empire Enterprises. How much did they pay to Afrique?

22 A. Over \$834,000.

23 Q. And St. Cloud Somali Athletic Club?

24 A. Yep, over \$260,000.

25 Q. Did you look in the bank account to see the nature of

1 those checks?

2 A. I did.

3 Q. Okay. Directing your attention back to Government
4 Exhibit O-20, specifically page 221, is this a check from
5 St. Cloud Somali Athletic Club to Afrique Hospitality Group?

6 A. Yes, it is.

7 Q. What's the date on the check?

8 A. It's May 31st. It says 2020. I'm not sure that that's
9 right. It's 2021? Yeah, it's 2021, I think.

10 Q. Okay.

11 A. Yeah.

12 Q. What's the amount that St. Cloud Somali Athletic Club is
13 paying to Afrique Hospitality Group?

14 A. It's \$175,770.

15 Q. What is that for?

16 A. It says it's for supplies.

17 Q. The next check here deposited into the account is from
18 Empire Cuisine & Market; is that right?

19 A. Yes.

20 Q. Same date, June 1st, 2021?

21 A. Yes.

22 Q. And what's this check for?

23 A. It's for \$200,000, and the memo line says shares
24 purchased.

25 Q. Page 190 of Government Exhibit O-20, is there another

1 check from Empire Cuisine & Market?

2 A. Yes.

3 Q. What's this one for?

4 A. This one is for \$49,000, and it says food service.

5 Q. And what's the date?

6 A. March 13, 2021.

7 Q. And page 207?

8 A. It's another check from Empire Cuisine & Market.

9 Q. To Afrique?

10 A. To Afrique.

11 Q. What's the date?

12 A. May 11th, 2021.

13 Q. And what's the amount?

14 A. The amount is \$106,300.

15 Q. And what does the memo line indicate the money is for?

16 A. It says distribution program.

17 Q. There's a series of more -- additional checks starting

18 at page 218 of Government Exhibit O-20; is that right?

19 A. Yes.

20 Q. This one is from Empire Cuisine & Market to Afrique

21 Hospitality?

22 A. Yes.

23 Q. On May 25th, 2021?

24 A. Yes.

25 Q. What's the amount?

1 A. \$185,000.

2 Q. What's it for?

3 A. It says for food service.

4 Q. Page 234, there's another check from Empire to Afrique?

5 A. Yes.

6 Q. August 16th?

7 A. Yes.

8 Q. What's the amount of the check?

9 A. \$69,396.

10 Q. What's the memo line indicate the money is for?

11 A. It says groceries.

12 Q. How about page 249?

13 A. It's another check from Empire Cuisine to Afrique

14 Hospitality Group for \$25,000, and the memo line says

15 groceries.

16 Q. 263?

17 A. It's another check from Empire Cuisine & Market to

18 Afrique Hospitality for \$104,850. Memo line says groceries.

19 Q. And what's the date on that check?

20 A. October 9th, 2021.

21 Q. Looks like three days later there's another check on

22 October 12th, 2021?

23 A. Yes.

24 Q. From Afrique Hospitality?

25 A. From Empire to Afrique Hospitality.

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

2 A. \$95,000.

3 Q. And what does the memo line indicate the money is for?

4 A. Says groceries/supplies.

5 Q. Now, I want to go back to these other entities listed as
6 Other.

7 THE COURT: Let's do that after break.

8 MR. THOMPSON: Very well.

9 THE COURT: Thank you.

10 We'll come back at 11:10, everyone.

11 All rise for the jury.

12 **IN OPEN COURT**

13 **(JURY NOT PRESENT)**

14 THE COURT: We're in recess until 11:10.

15 (Recess taken at 10:49 a.m. till 11:12 a.m.)

16

17 **IN OPEN COURT**

18 **(JURY PRESENT)**

19 THE COURT: You may all be seated.

20 And, counsel, you may continue.

21 MR. THOMPSON: Thank you, Your Honor.

22 BY MR. THOMPSON:

23 Q. Ms. Roase, before the break we were talking about the

24 flow of money into the Afrique Hospitality Group account

25 that was opened in January of 2021; is that right?

1 A. Yes.

2 Q. We talked about the \$1.7 million that came from
3 ThinkTechAct Foundation; is that right?

4 A. Yes.

5 Q. \$1.1 million from Feeding Our Future, correct?

6 A. Yes.

7 Q. \$800,000 for Empire Cuisine & Market?

8 A. Yes.

9 Q. And what do the memo lines on those checks indicate the
10 purchases were for?

11 A. It was a mix, but generally it was for food.

12 Q. We have another category, Other Food Program Income.
13 And, again, could you describe for us what these entities
14 are that paid a total of \$1.3 million to Afrique Hospitality
15 Group?

16 A. Yeah, these were other entities that had participated in
17 the Federal Child Nutrition Program, and they received
18 reimbursement claims for their participation, and I believe
19 these were all Feeding Our Future sites.

20 Q. And as part of your work following the money in this
21 case, did you look into the source of these funds that were
22 paid to Afrique Hospitality Group?

23 A. I did.

24 Q. Let's start with Cosmopolitan Business Solutions LLC.
25 Are you familiar with that entity?

1 A. I am.

2 Q. How so?

3 A. So this is their -- I want to say it's their legal name,
4 Cosmopolitan Business Solutions LLC, but their doing
5 business as name is Safari Restaurant.

6 Q. And remind us, you talked about Safari Restaurant
7 yesterday; is that right?

8 A. Yes.

9 Q. Was it significant to your investigation?

10 A. Yes, it was.

11 Q. How so?

12 A. That is what I started looking into when I first joined
13 the case. Their distribution site received over
14 \$12 million.

15 Q. From Feeding Our Future?

16 A. Yes.

17 Q. Did you examine Cosmopolitan Business Solution bank
18 records?

19 A. Yes, I did.

20 Q. And have those been marked -- I'm going to show you
21 what's been marked, but not yet admitted, as Government
22 Exhibit C-554.

23 And are these records of the Cosmopolitan Business
24 Solutions bank account at Bell Bank?

25 A. Yes.

1 Q. And Government Exhibit C-555, is this records of another
2 Cosmopolitan Business Solutions account at Bell Bank?

3 A. Yes. The other one was a checking account. This one is
4 a savings account.

5 MR. THOMPSON: Your Honor, I'd move to admit
6 Government Exhibits C-554 and C-555.

7 THE COURT: Any objection?

8 MR. MOHRING: No objection.

9 THE COURT: C-554 and 555 are admitted.

10 BY MR. THOMPSON:

11 Q. And, Ms. Roase, let's start with Government
12 Exhibit C-554. Again, this is a bank account; is that
13 right?

14 A. Yes, it is.

15 Q. At Bell Bank?

16 A. Yes.

17 Q. And who is the account holder here?

18 A. The account holder is Cosmopolitan Business Solutions
19 LLC.

20 Q. When you looked at this account, what were you looking
21 for?

22 A. Particularly concerning Afrique Hospitality, I was
23 trying to determine what was the source of that money.

24 Q. The money that went to Afrique?

25 A. Yes.

1 Q. I'm going to direct your attention to page 61.

2 What did you find when you looked at the money
3 that was deposited into the Cosmopolitan Business Solutions
4 account?

5 A. There were checks from Feeding Our Future, much like
6 what we've seen so far. This is a Feeding Our Future check
7 to -- it says Safari Restaurant or Cosmopolitan. And the
8 amount is for \$241,365.30.

9 Q. And for the record, this is page 61 of Government
10 Exhibit C-554?

11 A. Yes.

12 Q. And as we page through this account on pages 62 and 63,
13 we see more checks from Feeding Our Future to Safari
14 Restaurant?

15 A. Yes.

16 Q. Deposited into this account?

17 A. Yes.

18 Q. This one is also dated July 9th of 2021?

19 A. Yes.

20 Q. What's the amount on this check?

21 A. \$122,846.25.

22 Q. There's another check a couple pages later here on also
23 July 9th of 2021?

24 A. Yes.

25 Q. These are all dated the same date?

1 A. They are.

2 Q. How much is this check from Feeding Our Future to Safari
3 Restaurant?

4 A. \$245,557.20.

5 Q. It keeps going as we go through the account; is that
6 right?

7 A. Yes, more Feeding Our Future checks.

8 Q. Did you do a summary of the Cosmopolitan Business
9 Solutions/Safari Restaurant bank accounts?

10 A. Yes, I did.

11 Q. What did that summary contain?

12 A. Basically, it is very similar to what we've been seeing,
13 is that the sources is the Federal Child Nutrition Program
14 money.

15 Q. I'm going to show you what's been marked, but not yet
16 admitted, as Government Exhibit C-553.

17 Is this a chart of this Bell Bank account at -- in
18 the name of Cosmopolitan Business Solutions?

19 A. Yes, it is. This is just the checking account and does
20 not include the savings account.

21 Q. And does this summarize the activity in that account?

22 A. Yes, it does.

23 MR. THOMPSON: Your Honor, I'd move to admit
24 Government Exhibit C-553.

25 THE COURT: Any objection?

1 MR. MOHRING: No objection.

2 THE COURT: C-553 is admitted.

3 MR. THOMPSON: Thank you, Your Honor.

4 BY MR. THOMPSON:

5 Q. Ms. Roase, at the top, again, this is a Cosmopolitan
6 Business Solutions LLC account at Bell Bank?

7 A. Yes.

8 Q. What's the period of review?

9 A. So it's from the account opening, which is July 15th,
10 2021, to the closing, which is January 21st, 2022.

11 Q. Starting with the sources of funds, how much money was
12 deposited into this account over that six-month period from
13 July 2021 to January 2022?

14 A. It was almost \$7.4 million.

15 Q. And where did that money come from?

16 A. It largely came from Feeding Our Future, which is
17 \$6,065,000. And then it's next made up of Bet on Better
18 Future, 797,000, and 3017 LLC, which is 484,000.

19 Q. Are you familiar with those entities?

20 A. I am.

21 Q. How so?

22 A. They were entities that were created to participate in
23 the food program, and they are the owners of the -- I guess
24 one of the owners of the Cosmopolitan Business Solutions
25 restaurant.

1 Q. The \$6 million from Feeding Our Future to Cosmopolitan
2 Business Solutions, that was Federal Child Nutrition Program
3 money?

4 A. That was.

5 Q. If I'm understanding you correctly, the money from Bet
6 on Better Future and 3017 LLC was also Federal Child
7 Nutrition Program funds?

8 A. Yes.

9 Q. And directing your attention to the use of the funds,
10 what do we see here?

11 A. So you can see the largest expenses are Tunyar Trading,
12 Horseed Management LLC, Brava Restaurant & Cafe LLC, ASA
13 Limited LLC, Olive Management Inc. And then there's Afrique
14 Hospitality Group at \$482,000.

15 And then the next one you see is 3017 LLC. And
16 then there's Aimee Bock, 310,000. And then the next one
17 would be the legal or the bank account seizures. We also
18 seized this bank account.

19 Q. Okay. Starting at the top, are you familiar with these
20 entities, Tunyar Trading, Horseed Management, Brava
21 Restaurant & Cafe, ASA Limited and Olive Management?

22 A. Yes, they all participated in the food program.

23 Q. Okay. And are these -- who owned or controlled these
24 companies?

25 A. It was individuals that were related to the Safari

1 Restaurant group.

2 Q. When you say "the Safari Restaurant group," what do you
3 mean?

4 A. I guess they were -- these -- I want to say some of
5 these -- well, these entities, they, the first three, they
6 operated sites for Safari Restaurant. And actually, you
7 know what, for the first -- you know what, all five. I'm
8 sorry. The first five, they all had their own sites.

9 Q. Federal Child Nutrition Program sites?

10 A. Yes.

11 Q. And would the owners of -- did they have a relationship
12 with Cosmopolitan Business Solutions?

13 A. They did.

14 Q. How so?

15 A. Some of these, they were owners or they were relatives
16 of the Safari Restaurant.

17 Q. Ms. Roase, what were those five companies used for?

18 A. They were used to launder money.

19 Q. Federal Child Nutrition Program funds?

20 MR. MOHRING: Objection. Objection, Your Honor.
21 704, foundation.

22 THE COURT: Sustained.

23 MR. MOHRING: 701.

24 THE COURT: Sustained. The jury will disregard.

25

1 BY MR. THOMPSON:

2 Q. How much did Cosmopolitan Business Solutions send to
3 Afrique Hospitality Group?

4 A. \$482,024.70.

5 Q. Federal Child Nutrition Program funds, based on your
6 review of the bank accounts?

7 A. Yes.

8 Q. Directing your attention back to M-6, there's another --
9 there's other entities listed here as sending money to
10 Afrique Hospitality Group; is that right?

11 A. Yes.

12 Q. Inspiring Youth & Out Reach LLC?

13 A. Yes.

14 Q. Are you familiar with that entity?

15 A. I am.

16 Q. How much did it send to Afrique Hospitality Group?

17 A. \$169,390.95.

18 Q. Did you investigate that entity during -- during the
19 investigation?

20 A. I did.

21 Q. I'm going to show you now what's been marked, but not
22 yet admitted, as Government Exhibit C-496.

23 Are these the Secretary of State incorporation
24 records for Inspiring Youth & Out Reach?

25 A. Yes.

1 MR. THOMPSON: Your Honor, I'd move to admit
2 Government Exhibit C-496.

3 MR. MOHRING: No objection.

4 THE COURT: C-496 is admitted.

5 BY MR. THOMPSON:

6 Q. And directing your attention to page 2, when was
7 Inspiring Youth & Out Reach LLC created?

8 A. February 2nd, 2021.

9 Q. Did it participate in the Federal Child Nutrition
10 Program fund?

11 A. Yes, it did.

12 Q. I show you what's been marked, but not yet admitted, as
13 Government Exhibit C-504.

14 Are these meal counts that were submitted by
15 Inspiring Youth & Out Reach to Feeding Our Future?

16 A. Yes.

17 Q. And were they obtained pursuant to an email search
18 warrant?

19 A. Yes.

20 MR. THOMPSON: Your Honor, I'd move to admit
21 Government Exhibit C-504.

22 MR. MOHRING: No objection.

23 THE COURT: C-504 is admitted.

24 BY MR. THOMPSON:

25 Q. What do we see here, Ms. Roase?

1 A. So this is an after-school meal count clicker sheet for
2 Feeding Our Future. The site says it is Inspiring Youth &
3 Out Reach. Shows a supervisor as Shakur Abdisalam. Meal
4 type is supper and snack, and it looks like meals were
5 provided on Thursday, Friday and Saturday, 1,568 meals per
6 day.

7 Q. Okay. That's what the claims that were submitted to
8 Feeding Our Future were?

9 A. Yes.

10 Q. Was there also a roster listed?

11 A. There is.

12 Q. Do you notice anything about the attendance at this
13 site?

14 A. Yes. April 2021 they were present every day.

15 Q. Did you, Ms. Roase, look at a bank account for Inspiring
16 Youth & Out Reach during your investigation?

17 A. Yes, I did.

18 Q. I'm going to show you what's been marked as Government
19 Exhibit C-506. This is not yet in evidence.

20 Do you recognize Government Exhibit C-506?

21 A. Yes. This is the bank account for Inspiring Youth & Out
22 Reach at Bank of America.

23 Q. And when was it opened?

24 A. It's March 2nd, 2021.

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

1 Government Exhibit C-506.

2 THE COURT: Any objection?

3 C-506 is admitted.

4 BY MR. THOMPSON:

5 Q. Ms. Roase, you said this account was opened on March 2nd
6 of 2021. How does that relate to those meal counts we just
7 looked at?

8 A. I think it was for the same -- was it for the same
9 month? I don't recall.

10 Q. I'm showing you the first page of C-504.

11 A. Yes. Yep, same month.

12 Q. Okay. And did you look at the money that flowed into
13 this Inspiring Youth & Out Reach account after it was opened
14 in March of 2021?

15 A. I did.

16 Q. Generally, what did you find?

17 A. Mainly, Feeding Our Future checks being deposited.

18 Q. Here's an example. On page 128 of Government
19 Exhibit C-506, what's the date on this check?

20 A. March 16th, 2021.

21 Q. Two weeks after the account was opened?

22 A. Yes.

23 Q. What's the amount?

24 A. It's for \$59,752.

25 Q. From Feeding Our Future?

1 A. Yes.

2 Q. Page 130, the next deposit, what's the check date?

3 A. It's March 23rd, 2021.

4 Q. What's the amount of the check from Feeding Our Future
5 to Inspiring Youth & Out Reach?

6 A. \$138,744.14.

7 Q. And page 132, another check dated May 6th?

8 A. Yes.

9 Q. What's the amount on that check?

10 A. \$199,571.68.

11 Q. Ms. Roase, did you create a summary of the money into
12 and out of the Inspiring Youth & Out Reach bank account?

13 A. Yes, I did.

14 Q. And has that been marked, but not yet admitted, as
15 Government Exhibit C-505?

16 A. Yes.

17 MR. THOMPSON: Your Honor, I'd move to admit
18 Government Exhibit C-505.

19 THE COURT: Any objection?

20 MR. MOHRING: No objection, Your Honor.

21 THE COURT: C-505 is admitted.

22 BY MR. THOMPSON:

23 Q. Ms. Roase, again, will you tell us what you summarized
24 in this chart?

25 A. Yeah. So this is -- this is the Inspiring Youth & Out

1 Reach LLC bank account. There was only one. It was at Bank
2 of America. And the review period was from the account
3 opening, which is March 2nd, 2021, through December 31st,
4 2022.

5 Q. And how much money was deposited into that account in
6 2021?

7 A. Over \$1.5 million.

8 Q. And where did that money come from?

9 A. It largely came from Feeding Our Future, like
10 99.9 percent.

11 Q. All but \$100?

12 A. Yeah.

13 Q. And where did the money go?

14 A. It largely went to Star Distribution LLC, over
15 \$1 million; and the next largest is Afrique Hospitality
16 Group, \$169,390.95.

17 Q. Back to Government Exhibit M-6, the summary of money
18 into the Afrique Hospitality Group.

19 There's also an entry for payments from Active
20 Mind's Youth LLC to Afrique Hospitality; is that right?

21 A. Yes, that's right.

22 Q. What's the amount of the payments?

23 A. Active Mind's Youth is \$139,042.26.

24 Q. Did you look into the source of those funds?

25 A. I did.

1 Q. I'm going to show you what's been marked, but not yet
2 admitted, as Government Exhibit 486.

3 Are these the Secretary of State records for
4 Active Mind's Youth?

5 A. Yes.

6 MR. THOMPSON: Your Honor, I'd move to admit
7 Government Exhibit C-486.

8 MR. MOHRING: No admission, Your Honor -- or no
9 objection, Your Honor.

10 THE COURT: C-486 is admitted.

11 BY MR. THOMPSON:

12 Q. You said that when you were looking at new entities like
13 this, one of the things you would focus in on is the date
14 that they were created; is that right?

15 A. Right.

16 Q. Why would you do that?

17 A. If they -- if they were newly created in 2020, 2021, you
18 know, during the pandemic, it just seemed like they were
19 just created to participate in the food program.

20 MR. MOHRING: Objection. Foundation.

21 THE COURT: Overruled. The answer will stand.

22 BY MR. THOMPSON:

23 Q. When was Active Mind's Youth created?

24 A. February 4th, 2021.

25 Q. Did it fit that pattern?

1 A. Yes, it did.

2 Q. I'm going to show you what's been marked, but not
3 admitted, as Government Exhibit 488.

4 I'm going to leave that one up on the screen on
5 the left. Okay?

6 A. Okay.

7 Q. And then I'm going to --

8 This is not yet in evidence, Your Honor.

9 488 is on the right side. Do you recognize
10 Government Exhibit C-488?

11 A. Yes, I do.

12 Q. Is this an email from activemindsllc@gmail.com to
13 claims@feedingourfuture?

14 A. Yes, it is.

15 Q. On March 15, 2021?

16 A. Yes.

17 MR. THOMPSON: Your Honor, I'd move to admit
18 Government Exhibit C-488.

19 THE COURT: Any objection?

20 C-488 is admitted.

21 BY MR. THOMPSON:

22 Q. All right, Ms. Roase. Could you walk us through this
23 email here?

24 A. Yeah. So the email is from Fadumo Yusuf, who is the
25 Active Mind's Youth LLC. And the email is to

1 claims@feedingourfuture. The subject line says Active
2 Mind's and attached appears to be a PDF document of claims.

3 Q. Oh, boy, they're crooked here.

4 All right. Can you see these claims here?

5 A. Yes.

6 Q. And what do they show?

7 A. So this says it's for the week of January 31st. I would
8 believe it would be 2021.

9 Q. Okay.

10 A. And number of meals served is 2,016 every day.

11 Q. Starting on January 31st?

12 A. Yes.

13 Q. And, again, how does that compare to the date that
14 Active Mind's Youth was incorporated with the Minnesota
15 Secretary of State?

16 A. It was incorporated February 4th, 2021.

17 Q. Five days after the first meal count was submitted?

18 A. Yes.

19 Q. Or meal claims?

20 A. Yes.

21 Q. I'm going to show you now what's been marked, but not
22 yet admitted, as Government Exhibit 489. Is this another
23 email to Feeding Our Future related to Active Mind's Youth
24 LLC?

25 A. Yes, it is.

1 Q. Dated July 4th, 2021?

2 A. Yes.

3 MR. THOMPSON: Your Honor, I'd move to admit
4 Government Exhibit C-489.

5 THE COURT: Any objection?

6 MR. MOHRING: No objection, Your Honor.

7 THE COURT: C-489 is admitted.

8 BY MR. THOMPSON:

9 Q. I'm going to direct your attention down to page 3 of
10 Government Exhibit 489. What do we see here?

11 A. So this is a meal count -- or meal count clicker sheet.

12 Q. What's it claiming here?

13 A. It is claiming 2,016 meals every day.

14 Q. And this is dated May -- the week of May 30th, 2021; is
15 that right?

16 A. Yes.

17 Q. Is there an attendance roster attached to this?

18 A. Yes, there is.

19 Q. Notice anything about it?

20 A. So the claims are only for the first 11 days, and it
21 looks like every child attended every day.

22 Q. Did you obtain the bank records for this Active Mind's
23 Youth LLC?

24 A. Yes, I did.

25 Q. Why did you do that?

1 A. I wanted to see the source of the income of the money.

2 Q. I'm going to show you Government Exhibit 492, C-492,
3 which is not yet in evidence.

4 Is this records related to a Bank of America
5 account in the name of Active Mind's Youth?

6 A. Yes, it is.

7 MR. THOMPSON: Your Honor, I'd move to admit
8 Government Exhibit C-492.

9 THE COURT: Any objection?

10 MR. MOHRING: Without objection.

11 THE COURT: C-492 is admitted.

12 BY MR. THOMPSON:

13 Q. First page is the account name, business account?

14 A. Yes.

15 Q. Active Mind's Youth LLC?

16 A. Yes.

17 Q. What's the date it was opened?

18 A. It is March 25th, 2021.

19 Q. And what was the opening deposit into the account on
20 March 25th of 2021?

21 A. It was \$240,920.06.

22 Q. And directing your attention to page 92, is this that
23 opening deposit into the account?

24 A. Yes, it is.

25 Q. What was the opening deposit into the Active Mind's

1 Youth account in March of 2021?

2 A. It's a check from Feeding Our Future. It's for
3 \$240,920.06.

4 Q. And if we were to scroll through the deposit items,
5 would we see similar checks from Feeding Our Future to
6 Active Mind's?

7 A. Yes.

8 Q. Did you create a chart summarizing the money into and
9 out of this Active Mind's Youth LLC?

10 A. Yes, I did.

11 Q. And has that been marked, but not yet admitted, as
12 Government Exhibit C-491?

13 A. Yes.

14 Q. Did you prepare this based on your review of those bank
15 records?

16 A. Yes.

17 MR. THOMPSON: Your Honor, I'd move to admit
18 Government Exhibit C-491.

19 THE COURT: Any objection?

20 MR. MOHRING: No objection.

21 THE COURT: C-491 is admitted.

22 BY MR. THOMPSON:

23 Q. All right. Ms. Roase, can you discuss the deposits into
24 this Active Mind's Youth account?

25 A. Yeah. The only source of income is from Feeding Our

1 Future.

2 Q. And the account was opened on March 25th, 2021; is that
3 right?

4 A. Yes.

5 Q. It says here deposits from March 25th to July 1st, 2021.
6 What does that mean?

7 A. Yeah. So the review period, you can see it was through
8 July of 2022. However, I just wanted to make clear that the
9 deposits did not extend out that far, that it was only for
10 this, these few -- first few months.

11 Q. So \$1 million in about three months?

12 A. Yes.

13 Q. All Federal Child Nutrition Program money?

14 A. Yes.

15 Q. And where did the money go?

16 A. So it looks like the largest expenditure was to Star
17 Distribution LLC. The second item is DUA Supplies &
18 Distribution Inc. And then the third item is to Afrique
19 Hospitality Group for \$139,042.26.

20 Q. And are you familiar with Star Distribution LLC?

21 A. Yes, I am.

22 Q. How so?

23 A. The one that we went through earlier to the Inspiring
24 Youth & Out Reach also paid a significant amount to Star
25 Distribution LLC.

1 Q. And what is Star Distribution LLC?

2 A. They are a purported food distributor.

3 Q. Why do you say "purported food distributor"?

4 A. I subpoenaed records for that account to see how that
5 money was spent, what money was coming in and then how that
6 money was spent; and it did not appear that they purchased
7 enough food for the amount of food nutrition money that they
8 were receiving.

9 Q. Is there a relationship between these entities?

10 A. There is.

11 Q. What is that relationship?

12 A. So Active Mind's Youth, the account signer is Fadumo
13 Yusuf. That is Ikram Mohamed's -- I'm sorry -- Ikram
14 Mohamed Yusuf's mother. And then Star Distribution is
15 Suleman Mohamed Yusuf, I think I said it right, and that is
16 Ikram's brother.

17 Q. Okay. Is there more?

18 A. Later.

19 Q. Who is Ikram Yusuf Mohamed?

20 A. She is -- she was a Feeding Our Future employee. She
21 took over Hadith Ahmed's spot as the supervisor for --

22 MR. MOHRING: Objection, Your Honor. Foundation.

23 THE COURT: Overruled.

24 You may answer.

25 THE WITNESS: She took over -- she was the

1 supervisor of the site supervisors, which was Hadith Ahmed's
2 role, and she took over his role.

3 BY MR. THOMPSON:

4 Q. Okay. And how much did Active Mind's Youth LLC pay to
5 Afrique Hospitality Group in 2021?

6 A. It was \$139,042.26.

7 Q. Back to M-6, this summary of the Afrique Hospitality
8 Group, it also indicates there's \$96,000 was paid from
9 United Youth of Minneapolis LLC --

10 A. Yes.

11 Q. -- to Afrique; is that right?

12 A. Yes.

13 Q. Did you look into United Youth of Minneapolis?

14 A. Yes, I did.

15 Q. I show you what's been marked, but not yet admitted, as
16 Government Exhibit C-559.

17 Are these the Secretary of State records for
18 United Youth of Minneapolis?

19 A. Yes.

20 MR. THOMPSON: Your Honor, I'd move to admit
21 Government Exhibit C-559.

22 THE COURT: Any objection?

23 MR. MOHRING: No objection, Your Honor.

24 THE COURT: C-559 is admitted.

25

1 BY MR. THOMPSON:

2 Q. Ms. Roase, when was United Youth of Minneapolis LLC
3 registered with the Minnesota Secretary of State?

4 A. December 8th, 2020.

5 Q. Did it also participate in the Federal Child Nutrition
6 Program?

7 A. Yes, it did.

8 Q. Under the sponsorship of what entity?

9 A. Feeding Our Future.

10 Q. I'm going to show you what's been admitted -- or what's
11 been marked, but not yet admitted, as Government
12 Exhibit C-566.

13 Is this an email containing claims for this United
14 Youth company to Feeding Our Future?

15 A. Yes.

16 Q. In August of 2021?

17 A. Yes.

18 MR. THOMPSON: Your Honor, I'd move to admit
19 Government Exhibit C-566.

20 THE COURT: Any objection?

21 C-566 is admitted.

22 BY MR. THOMPSON:

23 Q. All right. Ms. Roase, these claims were submitted to
24 Feeding Our Future in August of 2021; is that right?

25 A. Yes, that's right.

1 Q. And directing your attention to page 2, this is another
2 meal count sheet; is that right?

3 A. Yes.

4 Q. For this United Youth of Minneapolis purported food
5 site?

6 A. Yes.

7 Q. How many meals did they purport to be serving or they
8 claim that they were entitled to reimbursement for serving
9 in the week of June 1st, 2021?

10 A. They were claiming 2,632 meals every day.

11 Q. And directing your attention to page 3. The week of
12 June 6th, what did they claim to be serving?

13 A. The same amount, 2,632 every day.

14 Q. I'm showing you now what's been marked, but not yet
15 admitted, as Government Exhibit C-567.

16 Is this an email dated January 13th of 2022?

17 A. Yes.

18 Q. And does it contain invoices from Afrique Hospitality
19 Group to United Youth of Minneapolis?

20 A. Yes, it does.

21 MR. THOMPSON: Your Honor, I'd move to admit
22 Government Exhibit C-567?

23 THE COURT: Any objection?

24 C-567 is admitted.

25

1 BY MR. THOMPSON:

2 Q. All right. Ms. Roase, can you take us through the
3 header information on these emails?

4 A. Yeah. So it looks like it originally started as an
5 email from Afrique Operations to -- it looks like
6 finance@eatafrique.com and amaden2@yahoo.com. And then it
7 was forwarded from this amaden2@yahoo.com to this
8 gandimohamed@gmail.com.

9 Q. Okay. And the subject line is Invoices to Ikram?

10 A. Yes.

11 Q. And it's sent to amaden2@yahoo?

12 A. Yes.

13 Q. Who then forwards it along, correct?

14 A. Yes.

15 Q. And what's the name attached to the amaden2@yahoo.com?
16 Whose email account is that?

17 A. It's Ikram Mohamed.

18 Q. The Feeding Our Future employee?

19 A. Yes.

20 Q. And directing your attention to pages 2 and 3, what do
21 we see here attached to the email that Ikram Mohamed sent?

22 A. So it is an invoice from Afrique Hospitality Group
23 billing United Youth of Minneapolis.

24 Q. What's the invoice for?

25 A. It looks like it's for bulk grocery items. There's

1 potatoes, tomatoes, onions, oranges, bananas, tuna, milk and
2 some child nutrition program items on the bottom there.

3 Q. And there's more invoices attached here; is that
4 correct?

5 A. Yes.

6 Q. Similar in nature?

7 A. Yes.

8 Q. From Afrique Hospitality Group to United Youth of
9 Minneapolis?

10 A. Yes.

11 Q. Did you look at the United Youth of Minneapolis bank
12 account during your investigation?

13 A. I did.

14 Q. I'm going to show you what's been marked as Government
15 Exhibit C-569.

16 Are these records related to a bank account at
17 Woodlands National Bank opened in the name of United Youth
18 of Minneapolis?

19 A. Yes.

20 MR. THOMPSON: Your Honor, I would move to admit
21 Government Exhibit C-569.

22 THE COURT: Any objection?

23 C-569 is admitted.

24 BY MR. THOMPSON:

25 Q. All right. We have, Ms. Roase, on the top of page 1,

1 this is the account agreement; is that right?

2 A. Yes.

3 Q. Who is the account owner?

4 A. The account owner is United Youth of Minneapolis LLC
5 with the name Aisha H. Hussein.

6 Q. Then on page 3 does it indicate when the account was
7 opened?

8 A. February 4th, 2021.

9 Q. And there's a deposit a week or so later from Feeding
10 Our Future; is that right?

11 A. Yes.

12 Q. Can you describe the check?

13 A. Yeah. It's a Feeding Our Future check, made payable to
14 United Youth of Minneapolis, for \$158,224.

15 Q. And if we page through here to page 31, what do we see?

16 A. There are two more checks from Feeding Our Future made
17 payable to United Youth of Minneapolis.

18 Q. Page 32?

19 A. It's another check from Feeding Our Future to United
20 Youth of Minneapolis.

21 Q. \$210,000?

22 A. Yes.

23 Q. 33?

24 A. It's another check from Feeding Our Future to United
25 Youth of Minneapolis.

1 Q. How much is this check for?

2 A. \$215,000.

3 Q. Page 34?

4 A. Another check from Feeding Our Future to United Youth of
5 Minneapolis.

6 Q. Ms. Roase, did you summarize -- did you create a chart
7 summarizing all the money into and out of this United Youth
8 of Minneapolis bank account?

9 A. Yes, I did.

10 Q. I'm showing you now what's been marked as Government
11 Exhibit 568. Is this that chart that you created?

12 A. Yes, it is.

13 MR. THOMPSON: Your Honor, I would move to admit
14 Government Exhibit C-568.

15 THE COURT: Any objection?

16 MR. MOHRING: No objection.

17 THE COURT: C-568 is admitted.

18 BY MR. THOMPSON:

19 Q. This is an account that was opened on February 4th of
20 2021 in the name of United Youth of Minneapolis.

21 How much money was deposited into it over the
22 course of the next year or so?

23 A. It's \$2,290,000.

24 Q. Where did that money come from?

25 A. It largely came from Feeding Our Future.

1 Q. You say "largely came from."

2 A. Yeah. So other than the \$5,000, which was actually a
3 loan, because it's repaid if you look on the other side, the
4 only other income would be \$100, and the rest came from
5 Feeding Our Future.

6 Q. \$2.2 million over the course of ten months or so?

7 A. Yes.

8 Q. All Federal Child Nutrition Program money?

9 A. Yes.

10 Q. I'm showing you now the Uses of Funds out of that
11 account.

12 How is those \$2.2 million in Federal Child
13 Nutrition Program funds used from the United Youth of
14 Minneapolis account?

15 A. Yeah, so -- again, this was on the other side too. This
16 was the loan repayment, so -- but other than that, the
17 largest payment, again, we see Star Distribution LLC,
18 \$1.6 million. The next item is IM Consultation LLC for
19 \$166,000. And then the fourth item is Afrique Hospitality
20 Group, \$96,589.31.

21 Q. We see a lot of familiar entities on these charts we've
22 gone through the last half hour or so; is that right?

23 A. Yes.

24 Q. Have you looked at the accounts of all these entities
25 that received money from these various Youths' companies,

1 Inspiring Youth, United Youth, et cetera?

2 A. Yes, I -- I did look at the Star Distribution LLC bank
3 account, IM Consultation bank account, GIF Properties, Aisha
4 Hussein, GAK Properties, DUA Supplies & Distribution, Afro
5 Produce, LLC, Abdullahe Jesow and Sharing & Caring
6 Childcare.

7 Q. And, Ms. Roase, when you -- and you did a similar
8 process for these other entities; is that right?

9 A. Yes, I did.

10 Q. What were you looking for when you looked into entities
11 that received money from these companies?

12 A. I was looking -- I was looking for food purchases.

13 Q. And what did you find?

14 A. Not enough food purchases.

15 MR. MOHRING: Objection. Foundation.

16 THE COURT: Sustained.

17 Did you say "not enough"?

18 THE WITNESS: Not enough.

19 THE COURT: All right. Sustained. The jury will
20 disregard.

21 BY MR. THOMPSON:

22 Q. Can you give us a sense of what you found in terms of
23 the amount of Federal Child Nutrition Program funds that
24 flowed into these, into these various entities versus the
25 amount of food actually purchased?

1 A. Well, I would say I think for all that I just listed
2 out, none of them had food purchases, except for Star
3 Distribution, which had some. So IM Consultation, no food;
4 GIF Properties, GAK Properties, no food; DUA Supplies, that
5 was not for food. Afro Produce, I suppose that's food; but
6 the others, no food.

7 Q. No food?

8 A. No food.

9 Q. Let's talk about Star Distribution. That company
10 received money from Afrique Hospitality here on -- as shown
11 on Government Exhibit M-6; is that right?

12 A. Yes.

13 Q. How much money does Star Distribution send to Afrique
14 Hospitality?

15 A. \$448,040.15.

16 Q. And did you look at the bank records of Star
17 Distribution?

18 A. Yes, I did.

19 Q. Showing you what's been marked as Government
20 Exhibit C-571. Is this a bank account for Star
21 Distribution?

22 A. Yes, it is.

23 Q. At what bank?

24 A. This is at Bank of America.

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

1 Government Exhibit C-571.

2 THE COURT: Any objection?

3 MR. MOHRING: No objection.

4 THE COURT: C-571 is admitted.

5 BY MR. THOMPSON:

6 Q. Directing your attention to the top, what's the name of
7 this account?

8 A. Star Distribution LLC.

9 Q. What kind of account is it?

10 A. It's a business checking account.

11 Q. And who opened this account?

12 A. Excuse me. The name is Suleman Yusuf Mohamed.

13 Q. Are you familiar with that name?

14 A. Yes, I am.

15 Q. How so?

16 A. It is Ikram Yusuf Mohamed's brother.

17 Q. And, again, where did Ikram Yusuf Mohamed work?

18 A. Feeding Our Future.

19 Q. What's the date on this that he opened this account?

20 A. February 25th, 2021.

21 Q. There's another account opened that same day at
22 Woodlands National Bank, C-572; is that correct? This has
23 not yet been admitted. Is that right?

24 A. Yes, yes.

25 Q. At Woodlands National Bank?

1 A. Yes, Woodlands National Bank.

2 MR. THOMPSON: Your Honor, I'd move to admit
3 Government Exhibit C-572.

4 THE COURT: Any objection?

5 MR. MOHRING: No objection, Your Honor.

6 THE COURT: C-572 is admitted.

7 BY MR. THOMPSON:

8 Q. Ms. Roase, did you do an analysis of the Star
9 Distribution accounts that received all this money?

10 A. Yes, I did.

11 Q. And has that been marked as Government Exhibit 570?

12 A. Yes.

13 MR. THOMPSON: Your Honor, I'd move to admit
14 Government Exhibit C-570.

15 THE COURT: Any objection?

16 MR. MOHRING: No objection.

17 THE COURT: C-570 is admitted.

18 BY MR. THOMPSON:

19 Q. Ms. Roase, could you describe this account for us?

20 A. Yeah. So this, yeah, this was two accounts that Star
21 Distribution LLC had, and so this is the combined sources
22 and uses for those two accounts. And the period of review
23 is from February 25th, 2021, which is the account opening of
24 the first one, to February 28th, 2023.

25 Q. And how much money did this entity Star Distribution

1 that had been opened by Ikram Yusuf Mohamed's husband
2 receive during that time frame?

3 A. Brother.

4 Q. Or brother. I'm sorry.

5 A. Over \$10.3 million.

6 Q. And you can -- can you walk us through where that money
7 came from?

8 A. So, yeah, the largest amount would be from Feeding Our
9 Future, \$4.9 million. The next largest is United Youth of
10 Minneapolis LLC, 1.6 million. Inspiring Youth & Out Reach,
11 \$1 million. And then skip down to Active Mind's Youth LLC,
12 that's 471,000.

13 Q. And those are entities we just went through?

14 A. Yes.

15 Q. And who created those entities? Did they have a
16 relationship with Ikram Mohamed?

17 A. They did.

18 Q. How so?

19 A. I believe that -- I think they were all actually -- they
20 all -- when they were created, the email I think is the
21 same. It's Ikram Yusuf Mohamed's email. But also they are
22 all family members of her.

23 Q. Okay. Some of these other entities that are listed
24 here, do you recognize them as well from the investigation?

25 A. I do.

1 Q. How so, just generally?

2 A. Generally, they all participated in the food program.

3 Q. Okay. We see several familiar companies that sent money
4 to Star Distribution; is that right?

5 A. Yes.

6 Q. Empire Cuisine & Market. How much did Empire Cuisine &
7 Market send to Star Distribution, the company owned by Ikram
8 Yusuf Mohamed's brother?

9 A. \$25,650.

10 Q. How much did Bushra Wholesalers send to Star
11 Distribution?

12 A. \$25,650.

13 Q. How much did Abdimajid Nur's company, Nur Consulting,
14 send to Star Distribution?

15 A. \$20,000.

16 Q. Did you look how this \$10 million that was deposited
17 into Star Distribution accounts was spent?

18 A. I did.

19 Q. What did you find?

20 A. Well, you can see the largest item I categorized as
21 payments to their family members, it was over \$2 million.
22 Next would be Afro Produce, 1.6 million.

23 And then the fourth down, Suleman Yusuf Mohamed,
24 that's the account signer and Ikram's brother. He himself
25 received \$1.2 million.

1 And then there's cash withdrawals of \$526,000.

2 And then, finally, we see Afrique receiving \$448,000.

3 Q. Okay. Okay. So I guess that takes us back to Afrique
4 Hospitality Group. We've now gone through the first eight
5 or nine lines in terms of Sources of Funds into Afrique
6 Hospitality; is that right?

7 A. Yes.

8 Q. How many of these lines are related -- or are entities
9 that basically received only Federal Child Nutrition Program
10 funds?

11 A. Well, so the five under the Other Food Program Income,
12 plus the ThinkTechAct, Feeding Our Future, Empire Cuisine &
13 Market, St. Cloud Somali Athletic Club, those were all just
14 Federal Child Nutrition Program funds.

15 Q. Okay. Now, let's look at the Use of Funds by Afrique
16 Hospitality. What do we see?

17 A. The largest use of funds would be payments made to
18 Empire Cuisine & Market and Empire Enterprises.

19 Q. And how much in payments -- how much did Afrique
20 Hospitality pay to Empire Cuisine & Market or Empire
21 Enterprises?

22 A. Over \$1.2 million.

23 Q. What's the next line item?

24 A. The next line item is Defendants' Personal Accounts,
25 \$1.1 million.

1 Q. Defendants in this case?

2 A. Yes.

3 Q. And after payments to the Defendants' Personal Accounts,
4 what do we see?

5 A. We see Food Expense, \$980,000.

6 Q. Okay. I want to talk about that Food Expense by
7 Afrique. Okay?

8 A. Okay.

9 Q. You've looked at the money that went towards food by
10 Afrique Hospitality; is that right?

11 A. Yes, I did.

12 Q. That \$980,000, did the bulk of it go to one vendor, one
13 company?

14 A. Yes, it did.

15 Q. What company was that?

16 A. It went largely to Sysco.

17 Q. Okay. All right. Did you look at those Sysco invoices?
18 Did you see them during the investigation, the Afrique Sysco
19 invoices?

20 A. Yes, I did.

21 Q. How were they used?

22 A. So they were used to support a number of claims for a
23 number of sites.

24 Q. Can you explain that? What do you mean?

25 A. So I came across a couple that were used to submit to

1 not only Partners in Nutrition sites, but also Feeding Our
2 Future sites.

3 Q. The same invoices?

4 A. They were the same invoices.

5 Q. Submitted in support of the same claims or different
6 claims?

7 A. They were for different claims.

8 Q. To the same sponsor or different sponsors?

9 A. They were different sponsors.

10 Q. Okay. I want to show you first what's been marked, but
11 not yet admitted, as Government Exhibit C-337. Do you see
12 that?

13 A. Yes.

14 Q. Is this an email from Mahad Ibrahim to Feeding Our
15 Future?

16 A. Yes.

17 Q. And Aimee Bock?

18 A. And Aimee Bock and Mukhtar Shariff.

19 Q. On August 4th of 2021?

20 A. Yes.

21 Q. This was obtained pursuant to an email search warrant;
22 is that right?

23 A. Yes.

24 MR. THOMPSON: Your Honor, I'd move to admit
25 Government Exhibit C-337.

1 THE COURT: Any objection?

2 MR. MOHRING: No objection.

3 THE COURT: C-337 is conditionally admitted.

4 BY MR. THOMPSON:

5 Q. All right. Ms. Roase, can you -- now that it is on the
6 screen, can you describe the participants to this email,
7 sender and recipient?

8 A. So it's an email from Mahad Ibrahim to
9 claims@feedingourfuture and also aimee@feedingourfuture and
10 Mukhtar Shariff. The subject is July claims for
11 Dar Al-Farooq and 1506.

12 Q. And then the email, it says, "Dear claims. Please find
13 attached claims, invoices and receipts for the two sites.
14 Thanks, Mahad."

15 Is that right?

16 A. Yes.

17 Q. And Mahad Ibrahim, again, in addition to being the owner
18 of ThinkTechAct, he's a signatory on the Afrique Hospitality
19 bank account; is that right?

20 A. Yes, he is.

21 Q. I direct your attention to page 2 of this exhibit.
22 There's -- well, what's here on page 2?

23 A. It looks like this is the food menu for the
24 Dar Al-Farooq site.

25 Q. And on page 3?

1 A. It's an invoice from Afrique Hospitality Group billing
2 for the 1506 Southcross Drive sites.

3 Q. That's another Federal Child Nutrition Program site?

4 A. Yes.

5 Q. What's the amount of the invoice from Afrique
6 Hospitality related to this site?

7 A. It's \$286,764.17.

8 Q. Page 4, there's a site delivery receipt; is that right?

9 A. Yes.

10 Q. For which site?

11 A. For 1506 Southcross.

12 Q. And what's the date?

13 A. The date is July 8th, 2021.

14 Q. Does it list the number of meals that were received by
15 the site?

16 A. Yes. 1,658 breakfasts and lunches.

17 Q. And is there a name listed as received by site
18 supervisor/staff?

19 A. It says "M Ismail."

20 Q. Similar receipts for the later weeks in July?

21 A. Yes.

22 Q. Both breakfast and lunch?

23 A. Yes.

24 Q. And then here on pages 7, 8, there's meal counts; is
25 that right?

1 A. Yes.

2 Q. For the Southcross site?

3 A. Yes.

4 Q. And just directing your attention, for example, to
5 page 8, what do we see?

6 A. Yeah, this is for the week of July 18th through
7 July 24th for the 1506 Southcross site. The number of meals
8 provided, it looks like first four days is 1,948 each day
9 and then the last three days is 1,975 each day.

10 Q. And then on page 11 there's another invoice from Afrique
11 Hospitality Group; is that right?

12 A. Yes.

13 Q. It was attached to this email sent to Feeding Our
14 Future, Aimee Bock and Mukhtar Shariff?

15 A. Yes.

16 Q. Would you describe this invoice for us?

17 A. This is an invoice from Afrique, and now it says it's
18 for the Dar Al-Farooq Islamic Center site.

19 Q. And what's the amount of the invoice from Afrique
20 Hospitality Group for the Dar Al-Farooq site?

21 A. \$192,043.60.

22 Q. And is there a site delivery receipt on page 12 here
23 related to the Dar Al-Farooq site?

24 A. Yes.

25 Q. What does it show?

1 A. It shows the number of meals received at the
2 Dar Al-Farooq site is 2,050 breakfasts and lunches.

3 Q. And what's -- whose name appears as site
4 supervisor/staff?

5 A. It says Mukhtar.

6 Q. And then on page 15, as an example, there's a meal count
7 form?

8 A. Yes.

9 Q. And what's the numbers listed for each day?

10 A. It looks like it's 2,050 every day from Sunday to Friday
11 and then Saturday is 1,950.

12 Q. Okay. All right. And then starting on page 17, there's
13 a series of invoices attached to this claims submission to
14 Feeding Our Future; is that right?

15 A. Yes.

16 Q. And this first one is an invoice from Upper Lakes Foods;
17 is that right?

18 A. Yes.

19 Q. And what is it billed to?

20 A. It's billed to Empire Cuisine & Market.

21 Q. If I just page through here, there's a series of
22 additional invoices from Empire Cuisine & Market -- or from
23 Upper Lakes Foods to Empire Cuisine & Market; is that right?

24 A. Yes.

25 Q. Starting on page 23 of Government Exhibit C-337, there's

1 an additional invoice; is that right?

2 A. Yes.

3 Q. And who is this invoice from?

4 A. This is from Asahal Distribution Inc.

5 Q. To?

6 A. To Empire Cuisine & Market.

7 Q. And then if I continue paging through, there's
8 additional invoices for that, correct?

9 A. Yes.

10 Q. Starting at page 30 there's a series of invoices from
11 Sysco; is that correct?

12 A. Yes.

13 Q. And who are these invoices to from Sysco?

14 A. This is addressed to Afrique Hospitality Group.

15 Q. And to be clear, this is all for food, correct? These
16 invoices --

17 A. Yes.

18 Q. -- talk about food?

19 A. Yes, they're all for food.

20 Q. Okay. And this continues for some pages here in support
21 of this claims submission to Feeding Our Future?

22 A. Right.

23 Q. And then finally on page 42, there's some invoices from
24 Afro Produce; is that right?

25 A. Yes.

1 Q. And who are those -- who is Afro Produce billing?

2 A. Afro Produce is billing Empire Cuisine & Market.

3 Q. For food?

4 A. For food.

5 Q. And there's several of these it looks like; is that
6 right?

7 A. Yes.

8 Q. Starting at page 47, there's other invoices submitted in
9 support of these claims to Feeding Our Future; is that
10 right?

11 A. Yes, it looks like it is more of a receipt from Gold
12 Star.

13 Q. And who is the member here?

14 A. The member is Mahad Ibrahim.

15 Q. All right. And paging through here, through page 50 of
16 this exhibit, there's more of those, correct?

17 A. Yes.

18 Q. At page 51 there's an invoice from US Halal Foods; is
19 that right?

20 A. Yes.

21 Q. And who is that invoice to?

22 A. It's billed to AE Distributors.

23 Q. What's the contact name listed on this?

24 A. It says Mukhtar.

25 Q. And this was also submitted in support of those claims

1 to Feeding Our Future?

2 A. Yes.

3 Q. As I page through, there's additional invoices from
4 US Halal Foods to AE Distributors; is that right?

5 A. Right.

6 Q. Through page 58 of the exhibit?

7 A. Yes.

8 Q. And, again, those were all submitted in support of
9 claims for meals distributed at the Dar Al-Farooq and
10 Southcross sites, correct?

11 A. Yes, that's right.

12 Q. By Mahad Ibrahim to Feeding Our Future?

13 A. Yes.

14 Q. And Mukhtar Shariff is included on the email?

15 A. Yes.

16 Q. Okay. Now, Ms. Roase, I want to show you what's been
17 admitted as Government Exhibit L-5. Start at page 3 here.

18 You said earlier that some of the receipts that
19 you found, the invoices were submitted to multiple sponsors
20 in support of different claims for different sites; is that
21 right?

22 A. Yes.

23 Q. The same food invoices?

24 A. They were the same invoices, yep.

25 Q. Is Government Exhibit L-5-3, is this an example of that?

1 A. Yes, it is.

2 Q. Can you describe what we have here at Government
3 Exhibit L-5 starting at page 3?

4 A. So this is an email from Abdiaziz Farah to Kara Lomen
5 at -- and Jodie Luzum at Partners in Nutrition.

6 Q. That's the other sponsor, correct?

7 A. That's the other sponsor. CC'd is another individual at
8 Partners in Nutrition. Abdi Nur is also copied, and Mahad
9 Ibrahim is copied.

10 Q. And what's the subject line of this email?

11 A. It says Empire Summer Food July Claim.

12 Q. And when was this email sent?

13 A. August 2nd, 2021.

14 Q. That's two days before the email that we just looked at
15 that was sent to Feeding Our Future?

16 A. Yes.

17 Q. This email from Abdiaziz Farah at Government
18 Exhibit L-5, what does it say -- what does he say is
19 attached to it?

20 A. So he says that there are Empire July invoices for all
21 sites and Empire completed meal count forms, Empire
22 completed meal delivery forms, Empire receipts for meals
23 distributed, and Empire July PIN approved menu with
24 substitutions for each site.

25 Q. Okay. When we're looking at C-337, the second page of

1 the exhibit, the first attachment is a menu for the
2 Dar Al-Farooq site; is that right?

3 A. Yes.

4 Q. When we look at L-5, the first attachment that Abdiaziz
5 Farah sends to Partners in Nutrition, is it similar?

6 A. It's similar.

7 Q. What is it?

8 A. The first one is a -- it's the food menu for Cedar Run.

9 Q. What's Cedar Run?

10 A. Cedar Run was a site. It was a food distribution site.

11 Q. And in his email on page 2, he says this is invoices for
12 all the sites; is that right?

13 A. Right.

14 Q. And so starting on page 4 of Government Exhibit L-5, are
15 there menus for many of the Empire sites under the
16 sponsorship of Feeding Our Future?

17 A. Yes.

18 Q. And I'm paging all the way through page 15 of that
19 exhibit; is that right?

20 A. Yes.

21 Q. Then on page 16 of Government Exhibit L-5, there's an
22 invoice from Empire Cuisine & Market to Partners in
23 Nutrition; is that right?

24 A. Yes.

25 Q. Could you describe that invoice for us?

1 A. This is for summer meals, and the description is for all
2 the sites, all the food distribution sites that Empire
3 Cuisine is billing for.

4 Q. And what's the total amount of that invoice?

5 A. \$988,212.04.

6 Q. And is that similar to the invoice that was submitted to
7 Feeding Our Future a couple days later?

8 MR. MOHRING: Objection. Leading, Your Honor.

9 THE COURT: Overruled.

10 You may answer.

11 THE WITNESS: Yes, it appears they used the
12 same -- it was the same template that was used.

13 BY MR. THOMPSON:

14 Q. Okay. So on the left, Government Exhibit C-337, then
15 there's site delivery receipts that we talked about earlier;
16 is that right?

17 A. Yes.

18 Q. For these sites?

19 A. Right.

20 Q. And then there's a series of invoices that we just
21 walked through; is that right?

22 A. Yes.

23 Q. And on the left, we have page 17 of Government
24 Exhibit C-337, which is invoices submitted in support of a
25 claim to Feeding Our Future; is that right?

1 A. Yes.

2 Q. For the month of July 2021?

3 A. Right.

4 Q. Including the Dar Al-Farooq site?

5 A. Yes.

6 Q. And this first invoice from Upper Lake Foods to Empire
7 Cuisine & Market; is that right?

8 A. Yes.

9 Q. What's the order number?

10 A. The order number is 830274 [sic].

11 Q. And then directing your attention to the right side of
12 the screen, which are the invoices submitted in support of
13 the claims to Partners in Nutrition for Empire sites for
14 that same month of July, what do we see?

15 A. The order -- so it's Upper Lakes Foods billed to Empire
16 Cuisine & Market, and the order number is 830724.

17 Q. So just for those who aren't following all these wild
18 screens and invoices, what do we have here? What are we
19 looking at?

20 A. These are the same invoices, and they were both used to
21 support meals claimed under Feeding Our Future and under
22 Partners in Nutrition.

23 Q. By different entities?

24 A. Yes.

25 Q. To different sponsors?

1 A. Yes.

2 Q. For different sites?

3 A. Right.

4 Q. Now, directing your attention to page 18 of Government
5 Exhibit C-337 on the left side of the screen and page 18 of
6 Government Exhibit L-5 on the right side of the screen,
7 what's the second invoice here submitted in support of both
8 the claims to Feeding Our Future and to Partners in
9 Nutrition?

10 A. The order number is 830724. They're the same.

11 Q. Same invoices submitted in support of each?

12 A. Yes.

13 Q. All right. On page 19 of each exhibit there's another
14 invoice?

15 A. Yes.

16 Q. From Upper Lakes Foods to Empire Cuisine & Market?

17 A. Yes.

18 Q. Submitted to both Feeding Our Future and Partners in
19 Nutrition?

20 A. Right.

21 Q. How would you compare the two there?

22 A. The order number, again, it's the same.

23 Q. These are the same invoices?

24 A. They are the same invoices.

25 Q. Page 20, the same thing, page 20 of each exhibit here?

1 A. Yes, you can see the order number is the same.

2 Q. Ms. Roase, are all the Upper Lakes Foods invoices that
3 were submitted in these emails alternatively to Feeding Our
4 Future and Partners in Nutrition the same invoices?

5 A. They were the same.

6 Q. Submitted in support of separate claims?

7 A. Right.

8 Q. To separate sponsors?

9 A. Yes.

10 Q. By separate companies?

11 A. Yes.

12 Q. In support of meals purportedly served at different
13 sites around the State of Minnesota?

14 A. That's right.

15 Q. You mentioned before that there was also invoices
16 submitted from Asahal Distribution?

17 A. Yes.

18 Q. Is that right?

19 A. Yes.

20 Q. In support of the Feeding Our Future claims?

21 A. Yes.

22 Q. Did you compare the Asahal Distribution invoices
23 submitted to Feeding Our Future in support of those claims
24 with the invoices submitted in support of claims to Partners
25 in Nutrition?

1 A. Yes, I did.

2 Q. And what did you find?

3 A. They were also the same.

4 Q. The same invoices submitted to both sponsors?

5 A. Yes.

6 Q. In support of different claims?

7 A. That's right.

8 Q. By different entities?

9 A. Yes.

10 Q. For meals purportedly served to different kids at
11 different sites?

12 A. Yes.

13 Q. Is that true of all the Asahal invoices submitted to
14 both Feeding Our Future and Partners in Nutrition?

15 A. Yes, they're all the same.

16 Q. There's also Sysco invoices submitted in support of the
17 claims both to Feeding Our Future and Partners in Nutrition;
18 is that right?

19 A. Yes.

20 Q. Did you review those?

21 A. I did.

22 Q. And what did you find?

23 A. They're the same. It's the same invoice from Sysco that
24 was submitted to both sponsors.

25 Q. Is that true of all the Sysco invoices that were

1 submitted to both Feeding Our Future and Partners in
2 Nutrition?

3 A. Yes.

4 Q. In July of 2021?

5 A. Yes.

6 Q. Starting on page 42 of both Government Exhibit C-337,
7 which is an email containing claims submitted to Feeding Our
8 Future for meals purportedly served at Dar Al-Farooq and
9 another site --

10 A. Yes.

11 Q. -- as well as Government Exhibit L-5 at page 42, which
12 is an email submitted to Partners in Nutrition for meals
13 purportedly served at Empire Cuisine & Market sites under
14 the sponsorship of Partners in Nutrition, there are Afro
15 Produce invoices; is that right?

16 A. Yes, that's right.

17 Q. And did you review those invoices?

18 A. Yes, I did.

19 Q. And what did you find?

20 A. They, again, are exactly the same invoices.

21 Q. Submitted to each of the two sponsors?

22 A. Yes.

23 Q. By both Afrique, ThinkTechAct and Empire?

24 A. Yes.

25 Q. In support of different meals?

1 A. Right.

2 Q. Or claims for reimbursement for purportedly serving
3 different meals?

4 A. Yes.

5 Q. To different kids?

6 A. Yes.

7 Q. At different sites?

8 A. Yes.

9 Q. By different companies?

10 A. Yes.

11 Q. Under different sponsors?

12 A. Yes.

13 Q. And is that true of all the Afro Produce invoices that
14 were submitted?

15 A. Yes, it is.

16 Q. In support of these claims?

17 A. Yes.

18 Q. Starting at page 47 of both Government Exhibits C-337
19 and L-5, there's some invoices from Gold Star; is that
20 right?

21 A. Yes.

22 Q. Or receipts?

23 A. Right, receipts. Yep.

24 Q. Did you review those?

25 A. I did.

1 Q. And what did you find?

2 A. They're exactly the same.

3 Q. Submitted to both Feeding Our Future and Partners in
4 Nutrition?

5 A. Yes.

6 Q. And that's true of every one; is that right?

7 A. That's right.

8 Q. Starting on page 51 of Government Exhibits 337 and L-5,
9 there are a series of invoices from US Halal Foods; is that
10 right?

11 A. Yes.

12 Q. To AE Distributors?

13 A. That's right.

14 Q. And is the contact listed?

15 A. The contact is Mukhtar.

16 Q. And are you familiar with AE Distributors?

17 A. Yes, generally.

18 Q. How so?

19 A. It is an entity that belongs to Mukhtar Shariff and
20 Mahad Ibrahim.

21 Q. Okay. What did you notice about these invoices, same
22 pattern?

23 A. It's exactly the same, same invoice number.

24 Q. Submitted to both Feeding Our Future and Partners in
25 Nutrition?

1 A. Yes.

2 Q. In support of claims for meals purportedly served at
3 different sites?

4 A. Right.

5 Q. By different entities?

6 A. Yes.

7 Q. And that continues all the way down to the end of -- to
8 page 58 of these two exhibits; is that right?

9 A. Yes.

10 Q. Additional invoices here. This one is Invoice
11 Number 526691?

12 A. Yep.

13 Q. Submitted to both Feeding Our Future and Partners in
14 Nutrition?

15 A. Yes.

16 Q. In support of these different claims?

17 A. Right.

18 Q. And, again, just to -- I'm turning to page 3 of
19 Government Exhibit C-337 and page 16 of Government
20 Exhibit L-5.

21 These are the invoices that were -- that those
22 receipts purported to back up, correct?

23 A. That's right.

24 Q. Afrique Hospitality Group invoice for Feeding Our
25 Future?

1 A. Yes.

2 Q. Empire Cuisine & Market submitted to Partners in
3 Nutrition?

4 A. Yes.

5 Q. Thank you.

6 THE COURT: Mr. Thompson, at this time I'd like to
7 take a lunch break, and we will return at 1:30.

8 MR. THOMPSON: Thank you, Your Honor.

9 THE COURT: All rise for the jury.

10 **IN OPEN COURT**

11 **(JURY NOT PRESENT)**

12 THE COURT: Mr. Goetz.

13 MR. GOETZ: One very quick thing, Your Honor.

14 THE COURT: Yes.

15 MR. GOETZ: I'd ask that the government produce
16 directly a copy of that C-337 that was introduced. I have
17 some concerns about it, but I'd like to -- the copy that was
18 introduced, I'd ask the government produce -- the exhibit
19 that was introduced, I ask the government produce a copy of
20 that.

21 MR. THOMPSON: Do you want a different copy of it?

22 MR. GOETZ: Just an electronic copy, but the exact
23 copy of what was just introduced.

24 MR. THOMPSON: Okay.

25 THE COURT: Do you have that, Mr. Thompson?

1 MR. THOMPSON: I think so. I'll confer with
2 Mr. Goetz to make sure I understand what he's looking for.

3 THE COURT: All right. Thank you.

4 1:30, everybody. Thank you.

5 (Recess taken at 12:28 p.m. till 1:33 p.m.)

6

7

IN OPEN COURT

8

(JURY PRESENT)

9

THE COURT: You may all be seated.

10

Counsel, you may continue.

11

MR. THOMPSON: Thank you, Your Honor.

12

BY MR. THOMPSON:

13

Q. Good afternoon, Ms. Roase. Welcome back.

14

A. Thank you.

15

Q. Before the break, we were going through some invoices;
16 is that right?

17

A. Yes.

18

Q. That were submitted to both Partners in Nutrition and
19 Feeding Our Future; is that right?

20

A. Yes.

21

Q. They were identical invoices?

22

A. They were.

23

Q. Okay. I want to go back briefly to Afrique Hospitality.
24 Okay?

25

A. Okay.

1 Q. Again, whose company is Afrique Hospitality?

2 A. That's Mukhtar Shariff's.

3 Q. Did you look at --

4 MR. MOHRING: Objection, Your Honor. Misstates
5 the record.

6 THE COURT: Overruled. The jury will recall the
7 evidence.

8 BY MR. THOMPSON:

9 Q. Ms. Roase, did you look at money that went out of the
10 Afrique Hospitality account?

11 A. Yes, I did.

12 Q. Was there transfers out of Afrique Hospitality to
13 Mukhtar Shariff?

14 A. Yes.

15 Q. Approximately, how much money went from Afrique
16 Hospitality to Mukhtar Shariff?

17 A. It was over a million dollars.

18 Q. Now, I want to direct your attention to Government
19 Exhibit O-20, which is the Afrique Hospitality bank account;
20 is that right?

21 A. Yes.

22 Q. And, again, there's five signatories on that account; is
23 that correct?

24 A. Yes.

25 Q. Who is the first signatory?

1 A. Mukhtar Mohamed Shariff.

2 Q. And the last signatory?

3 A. Mahad Ibrahim.

4 Q. You said that Mukhtar Shariff got more than a million
5 dollars out of the account?

6 A. Yes, he did.

7 Q. I want to talk to you a little bit about where that
8 money went.

9 Starting with this page 45 of Government
10 Exhibit O-20, which is the June 2021 statement for the
11 Afrique's Hospitality account at Bank of America; is that
12 right?

13 A. Yes.

14 Q. And what do we see here on June 2nd, 2021?

15 A. It's a transaction to coinbase.com, and it identifies
16 Mukhtar Shariff.

17 Q. Okay. So what happened there?

18 A. It was an electronic transfer of \$100,000 to Coinbase.

19 Q. And whose Coinbase account?

20 A. It was Mukhtar Shariff's.

21 Q. For those who aren't familiar, what is Coinbase?

22 A. It's a cryptocurrency exchange.

23 Q. There's a second transaction five days later on June 7th
24 of 2021; is that right?

25 A. Yes.

1 Q. What transaction is happening there?

2 A. That's another \$100,000 transfer to Mukhtar Shariff's
3 Coinbase account.

4 Q. Actually, this is -- these are deposits; is that right?

5 A. Yes.

6 Q. So these coming into the account here?

7 A. Oh, I'm sorry. Yes, these are -- yes, these are coming
8 into the account.

9 Q. Is money going both ways, I take it?

10 A. Yes, there are.

11 Q. And here on June 1st, 2021, what do we see?

12 A. Yeah, there's two transfers to Coinbase on June 1st,
13 each for \$100,000.

14 Q. To Mukhtar Shariff's personal account at Coinbase?

15 A. Yes.

16 Q. How about here on August 9th, 2021?

17 A. Yeah, that's another \$78,000 transfer to Mukhtar
18 Shariff's Coinbase account.

19 Q. On page 64 of Government Exhibit O-20, do we see
20 additional transactions?

21 A. Yes.

22 Q. What happened on August 27th?

23 A. There's another \$100,000 transfer to Mukhtar Shariff's
24 Coinbase account.

25 Q. And three days later on August 30th, 2021?

1 A. Another \$100,000 transfer to Coinbase.

2 Q. Thank you.

3 There's a lot of withdrawals here to Gusto. Did
4 you see that?

5 A. Yes.

6 Q. For example, this one on August 27th. What's Gusto?

7 A. Gusto is a payment processor.

8 Q. And in this case did you look at this Gusto account of
9 Afrique Hospitality?

10 A. I did. We did subpoena records for Gusto.

11 Q. And what did you find?

12 A. We found out who was getting paid these Gusto payments.

13 Q. Who was getting paid?

14 A. We found out who was getting paid.

15 Q. Oh, you found who. Okay.

16 A. Yeah.

17 Q. And did Mukhtar Shariff receive any money from Gusto,
18 the Afrique's Hospitality Gusto account?

19 A. Yes, he did.

20 Q. And did he receive that personally or in the name of one
21 of his entities?

22 A. He received it via an entity called Wadani Consulting.

23 Q. Now, Ms. Roase, I want to change gears here and talk
24 about another person involved in this case. Hadith Ahmed.

25 Do you remember Hadith Ahmed?

1 A. Yes.

2 Q. Where did he work back in the day?

3 A. He was a Feeding Our Future employee.

4 Q. And he testified that he received kickbacks, is that
5 right, when he worked at Feeding Our Future?

6 A. Yes, that's right.

7 Q. During the investigation did you find bank records
8 reflecting payments to Hadith Ahmed?

9 A. Yes, I did.

10 Q. I want to show you what's been marked, but not admitted,
11 as Government Exhibit L-14. Do you see Government
12 Exhibit L-14?

13 A. Yes.

14 Q. And is this a check from Empire Cuisine & Market to
15 Hadith Ahmed?

16 A. Yes, it is.

17 MR. THOMPSON: Your Honor, I would move to admit
18 Government Exhibit L-14.

19 THE COURT: Any objection?

20 L-14 is admitted.

21 BY MR. THOMPSON:

22 Q. Ms. Roase, could you describe L-14 for the record, this
23 check?

24 A. Yeah. It's an Empire Cuisine & Market check to Hadith
25 Ahmed for \$10,000 on February 1st, 2021. The memo line says

1 consulting.

2 Q. I'm going to direct your attention to -- one second.

3 I'm going to show you what's been marked, but not
4 yet admitted, as Government Exhibit L-16. Do you see
5 Government Exhibit L-16?

6 A. Yes, I do.

7 Q. What is it?

8 A. It's a check from Bushra Wholesalers to Mizal Consulting
9 for \$65,250.

10 MR. THOMPSON: Your Honor, I'd move to admit
11 Government Exhibit L-16.

12 THE COURT: Any objection?

13 MR. SCHLEICHER: No objection.

14 THE COURT: L-16 is admitted.

15 BY MR. THOMPSON:

16 Q. Could you describe Government Exhibit L-16?

17 A. Yeah. It's a check that's dated July 25th, 2021. It's
18 a check from Bushra Wholesalers to Mizal Consulting for
19 \$65,250, and the memo line says consulting.

20 Q. And are you familiar with the entity Mizal Consulting?

21 A. I am.

22 Q. What is it?

23 A. It was a shell company that Hadith Ahmed created to
24 receive kickbacks.

25 Q. Did you look at records of that Mizal Consulting company

1 that Hadith Ahmed created?

2 A. I did.

3 Q. And did you analyze the contents of that account?

4 A. I did.

5 Q. I'd like to show you what's been marked, but not yet
6 admitted, as Government Exhibit M-43. Do you see M-43 on
7 the screen?

8 A. I do.

9 Q. What is it?

10 A. So this is a combined account of the Mizal Consulting
11 LLC account, as well as Hadith Ahmed's personal bank
12 account. And it's for the period of April 9th, 2020,
13 through April 7th, 2022.

14 MR. THOMPSON: Your Honor, I'd move to admit
15 Government Exhibit M-43.

16 THE COURT: Any objection?

17 M-43 is admitted.

18 BY MR. THOMPSON:

19 Q. Ms. Roase, can you explain to us what we have here?

20 This is an analysis of two separate accounts; is that right?

21 A. Yes. It's -- yeah, I think it might be a checking and
22 savings personal account for Hadith, plus the Mizal
23 Consulting account.

24 Q. How much money was deposited into those accounts during
25 this approximately two-year period?

1 A. It was about almost \$1.5 million.

2 Q. And are you familiar with any of the entities that are
3 listed as sending money to either Hadith Ahmed personally or
4 Mizal Consulting?

5 A. I recognize most of them on here.

6 Q. And how do you recognize most of them?

7 A. These were other accounts that I had subpoenaed for, and
8 so those were accounts I had reviewed, and they all
9 participated in the Federal Child Nutrition Food Program.

10 Q. Under the sponsorship of which entity?

11 A. Under Feeding Our Future.

12 Q. Where Hadith Ahmed worked?

13 A. Yes.

14 Q. Okay. And how much did Bushra Wholesalers pay to either
15 Hadith Ahmed personally or via his LLC Mizal Consulting?

16 A. \$120,250.

17 Q. And whose entity is Bushra Wholesalers?

18 A. Said Farah and Abdiwahab Aftin.

19 Q. How much did Empire Cuisine & Market pay to Hadith
20 Ahmed?

21 A. \$20,000.

22 Q. Whose entity is Empire Cuisine & Market?

23 A. That is Abdiaziz Farah and Mohamed Ismail.

24 Q. And Said Farah also wrote a check to Hadith Ahmed; is
25 that correct?

1 A. He did.

2 Q. What was that check for, how much?

3 A. \$12,435.

4 Q. And then on the left-hand side, there's the use of those
5 funds; is that right?

6 A. Yes.

7 Q. About a third of the funds were seized pursuant to a
8 government seizure warrant; is that right?

9 A. Yes, that's right.

10 Q. After that, what do we see?

11 A. So there's additional \$315,000 payable to Hadith Ahmed,
12 and the next line is \$139,000 to Empire Cuisine & Market
13 LLC.

14 Q. Then there's \$113,000 in foreign wires; is that right?

15 A. Yes, that's right.

16 Q. Transfers abroad?

17 A. Yes.

18 Q. And I'm showing you now Government Exhibit 106, which is
19 a bank account of Said Farah; is that correct?

20 A. Yes, that's right.

21 Q. And on page 279, is this one of the checks to Hadith
22 Ahmed?

23 A. Yes.

24 Q. What is the date of the check from Said Farah to Hadith
25 Ahmed?

1 A. It's February 15, 2021.

2 Q. And what is the amount of the payment?

3 A. It's \$12,435.

4 Q. What does it say it's for?

5 A. I think it says loan, but appears it might have been
6 crossed out.

7 Q. And that's February 15th of 2021; is that right?

8 A. That's right.

9 Q. Did you -- I'm going to direct your attention to
10 page 1253 of this exhibit. Are you able to trace the source
11 of the funds used to make that payment?

12 A. Yes.

13 Q. And what do we see here on page 1253?

14 A. This is a check from Empire Cuisine & Market LLC. It's
15 dated February 10th, 2021. The pay to the order of is MN
16 Food Grocery/Said Farah for \$115,000, and the memo line says
17 groceries.

18 Q. And what was the date of that in comparison to the date
19 Said Farah wrote the check to Hadith Ahmed?

20 A. The check that was written out to Hadith Ahmed was a few
21 days after this check.

22 Q. And there's a second check here to Said Farah from
23 Empire Cuisine & Market on February 11th, 2021; is that
24 right?

25 A. Yes.

1 Q. What's the amount of that check?

2 A. This is for \$97,000.

3 Q. What does the memo line indicate?

4 A. It says products/supplies.

5 Q. I want to show you now what's been marked, but not yet
6 admitted, as Government Exhibit L-18.

7 Do you recognize Government Exhibit L-18?

8 A. Yes, I do.

9 Q. Is it a check from Bushra Wholesalers to Mizal
10 Consulting?

11 A. Yes, it is.

12 MR. THOMPSON: Your Honor, I would move to admit
13 Government Exhibit L-18.

14 THE COURT: Any objection?

15 MR. SCHLEICHER: No objection.

16 THE COURT: L-18 is admitted.

17 BY MR. THOMPSON:

18 Q. Ms. Roase, could you describe the check we're looking at
19 here?

20 A. Yeah, it's a check from Bushra Wholesalers made payable
21 to Mizal Consulting for \$35,000, and the memo line says
22 consulting.

23 Q. And what's the date on that check?

24 A. September 9th, 2021.

25 Q. Okay. Now I'm going to show you what's been marked, but

1 not yet admitted, as Government Exhibit L-19. And what
2 is -- is this another check from Bushra Wholesalers to Mizal
3 Consulting?

4 A. Yes, it is.

5 Q. On October 11, 2021?

6 A. Yes.

7 MR. THOMPSON: Your Honor, I would move to admit
8 Government Exhibit L-19.

9 MR. SCHLEICHER: No objection.

10 THE COURT: L-19 is admitted.

11 BY MR. THOMPSON:

12 Q. And what's the -- how much is this check for?

13 A. It's for \$20,000.

14 Q. What does the memo line indicate?

15 A. It says consulting.

16 Q. Thank you, Ms. Roase.

17 Now, Bushra Wholesalers, that's Said Farah and
18 Abdiwahab Aftin's company; is that right?

19 A. Yes, that's right.

20 Q. I'd like to show you what's been marked, but not
21 admitted, as Government Exhibit P-5. Do you recognize this
22 photograph?

23 A. Yes.

24 Q. Who is depicted in it?

25 A. This is Said Farah.

1 MR. THOMPSON: Your Honor, I'd move to admit
2 Government Exhibit P-5.

3 MR. SCHLEICHER: No objection.

4 THE COURT: P-5 is admitted.

5 BY MR. THOMPSON:

6 Q. Okay. Now, we've been talking about kickback payments.
7 I want to show you another exhibit, L-17, not yet in
8 evidence.

9 Is this a check from Empire Enterprises to Julius
10 Scarver?

11 A. Yes, it is.

12 Q. In August of 2021?

13 A. Yes.

14 MR. THOMPSON: Your Honor, I would move to admit
15 Government Exhibit L-17.

16 THE COURT: Any objection?

17 L-17 is admitted.

18 BY MR. THOMPSON:

19 Q. Ms. Roase, could you describe this check, Government
20 Exhibit L-17?

21 A. It's a check from Empire Enterprises LLC paid to the
22 order of Julius Scarver for \$10,000. The memo line says
23 associate fees.

24 Q. Little hard to read the actual day, but what's the
25 month?

1 A. It's August of 2021.

2 Q. And who is Julius Scarver? Do you recognize that name?

3 A. Yes. He was an employee of Partners in Nutrition.

4 Q. Did he -- okay. Did you learn anything else about
5 Julius Scarver during the investigation?

6 MR. ANDREW BIRRELL: Objection. Calls for
7 hearsay.

8 THE COURT: Sustained. Rephrase.

9 BY MR. THOMPSON:

10 Q. Did Hadith Ahmed testify about Julius Scarver earlier in
11 this trial?

12 A. Yes, he did.

13 Q. And did he explain something else about Julius Scarver
14 and his personal life?

15 A. Julius Scarver and Kara Lomen were dating.

16 Q. Back in this time frame in 2021?

17 A. Right.

18 Q. And remind us again who Kara Lomen is.

19 A. She was the -- the CEO of Partners in Quality Care.

20 Q. Now, Scarver, did he have an entity that was enrolled in
21 the Federal Child Nutrition Program?

22 A. Yes.

23 Q. What was the name of that company?

24 A. It's The Free Minded Institute.

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

1 Exhibit B-12. Are these the articles of incorporation for
2 The Free Minded Institute?

3 A. Yes.

4 Q. And who is the registered agent of the company here?

5 A. It's Julius R. Scarver.

6 Q. And who opened the company?

7 A. It's signed by Julius Scarver.

8 Q. On what date did Julius Scarver create The Free Minded
9 Institute?

10 A. July 29th, 2021.

11 Q. Now, I want to show you what's been marked, but not yet
12 admitted, as Government Exhibit G-207.

13 Do you recognize Government Exhibit G-207?

14 A. Yes, I do.

15 Q. What is it?

16 A. It's an email from Kara Lomen to Julius Scarver.

17 Subject is about Filing Paperwork.

18 Q. And does it contain those articles of incorporation for
19 The Free Minded Institute?

20 A. Yes, it does.

21 MR. THOMPSON: Your Honor, I would move to admit
22 Government Exhibit G-207.

23 MR. ANDREW BIRRELL: No objection to its
24 conditional.

25 THE COURT: G-207 is conditionally admitted.

1 BY MR. THOMPSON:

2 Q. What do we see here on the screen, Ms. Roase?

3 A. So it's an email from Kara Lomen to Julius Scarver.

4 Subject is Filing Paperwork. And the attachments are the
5 incorporation documents for The Free Minded Institute.

6 Q. You said that The Free Minded Institute was involved in
7 the Federal Child Nutrition Program?

8 A. Yes, it was.

9 Q. What type of entity was The Free Minded Institute?

10 A. It was a nonprofit.

11 Q. Did you look to see -- did you review its financial
12 records?

13 A. I did.

14 Q. Did it have a bank account?

15 A. Yes, it did.

16 Q. Showing you what's been admitted as Government
17 Exhibit O-141, are these the U.S. Bank records of an account
18 of The Free Minded Institute?

19 A. Yes, it is.

20 Q. It's a business account?

21 A. Yes, it is.

22 Q. What type of business and type of account are listed
23 here?

24 A. The type of business is nonprofit, and the account type
25 is nonprofit checking.

1 Q. And the account, what name is on this account?

2 A. The account holder is Julius Scarver. The account title
3 is The Free Minded Institute.

4 Q. And the address listed on it is an address in St. Paul?

5 A. Yes, it is.

6 Q. Are you familiar with that address?

7 A. Yes, I am.

8 Q. How so?

9 A. That is Julius Scarver's grandma's house.

10 Q. And looking at the bottom here, when did Julius Scarver
11 open this account?

12 A. October 21, 2021.

13 Q. And I'm directing your attention to page 4, which I
14 believe is the first statement of this Free Minded Institute
15 account; is that right?

16 A. Yes, that's right.

17 Q. What can you tell us about the opening deposit into the
18 account?

19 A. Yeah. So, yeah, we saw on the signature page that it
20 was opened October 21. And the very first deposit is, down
21 here, is also the same day for \$172,800.49.

22 Q. Directing your attention to page 39. Is this that
23 opening deposit ticket?

24 A. Yes, it is.

25 Q. And what was deposited on that first day starting at

1 page 40 here?

2 A. Yeah, it's made up of a few different checks. And this
3 first one is from Partners in Nutrition payable to The Free
4 Minded Institute for \$15,272.77. Memo line says Shamrock
5 Court September.

6 Q. Signed by Kara Lomen?

7 A. Yes.

8 Q. Page 41, is this another check that was part of that
9 opening deposit into The Free Minded Institute account?

10 A. Yes, it was.

11 Q. How much is this check for?

12 A. This is \$78,388.19 for the Cedar Culture, September.

13 Q. Page 42, another check?

14 A. Yes.

15 Q. Part of that opening deposit?

16 A. Yes.

17 Q. What's the amount on this check?

18 A. It's \$79,139.53 for Bet'al Afaan, September.

19 Q. And if we were just paging through the account, what do
20 we see about the checks into The Free Minded Institute?

21 A. Yeah, all the deposits are checks from Partners in
22 Nutrition.

23 Q. Did you also -- going back to page 4 of this initial
24 opening statement, we looked at the opening deposit into the
25 account?

1 A. Yes.

2 Q. How much was that?

3 A. It was 172,800.49.

4 Q. Those checks from PIN?

5 A. Yes.

6 Q. And if I -- it looks like there's a big check out on
7 October 27th; is that correct?

8 A. Yes.

9 Q. We will look at that check here. And here I'm showing
10 you what's been -- page 78 of Government Exhibit O-141. Do
11 you see that?

12 A. Yes, I do.

13 Q. What is it?

14 A. So it's a check from The Free Minded Institute, payable
15 to Empire Cuisine & Market, for \$163,810.98.

16 Q. And I'm going to show you page 78, that check, on the
17 left side of the screen, okay, and then going back to page 4
18 on the right side, which is the opening deposit into the
19 account.

20 What do we see here? On October 21st there was an
21 initial deposit into the account?

22 A. Yes.

23 Q. \$172,000?

24 A. Yes.

25 Q. From PIN?

1 A. Right.

2 Q. And what happened?

3 A. Most of that money then is written out to Empire Cuisine
4 & Market.

5 Q. The following day?

6 A. Yes.

7 Q. Okay. Page 82. Is there another check from The Free
8 Minded Institute to Empire Cuisine?

9 A. There is.

10 Q. How much is that check?

11 A. \$595,000.

12 Q. Page 94?

13 A. Yep, it's \$225,000 to Empire Cuisine.

14 Q. Page 113, is there another check from The Free Minded
15 Institute to Empire Cuisine & Market?

16 A. Yes.

17 Q. What's the date on that check?

18 A. January 14th, 2022.

19 Q. How much did The Free Minded Institute pay to Empire
20 Cuisine & Market on January 14th of 2022?

21 A. \$850,000.

22 Q. There's also payroll checks out of this account; is that
23 right?

24 A. Yes.

25 Q. Directing your attention to page 99, this is another

1 check from The Free Minded Institute?

2 A. Yes.

3 Q. What's the date on it?

4 A. The date is January 7th, 2022.

5 Q. Who is the check written to?

6 A. It's written out to Abdiaziz Farah.

7 Q. For \$1200?

8 A. Yes.

9 Q. What's the memo line say the payment is for?

10 A. It says salary.

11 Q. How about page 101?

12 A. It's another check to Abdiaziz Farah for \$3,240.

13 Q. What does the memo line indicate it's for?

14 A. It says St. Cloud consulting.

15 Q. Page 102, another check that same day, January 7, 2022?

16 A. Yes.

17 Q. Who is it to?

18 A. It's to Abdiaziz Farah.

19 Q. And what is it for?

20 A. It's \$2,240. And the memo line says salary, consulting.

21 Q. Page 86, there's also checks written out of this account

22 to Hayat Nur?

23 A. Yes.

24 Q. Are you familiar with Hayat Nur?

25 A. Yes, I am.

1 Q. Who is she?

2 A. She's a defendant in this case, and she is Abdimajid
3 Nur's sister.

4 Q. Could you describe this check from The Free Minded
5 Institute to Hayat Nur?

6 A. It's for \$1,120, and it says October FD.

7 Q. Page 91 of Government Exhibit O-141, another check from
8 The Free Minded Institute to Hayat Nur?

9 A. Yes.

10 Q. What's the date and amount?

11 A. It's December 20th, 2021, for \$1,220.

12 Q. And on page 110 of Government Exhibit O-141, what do we
13 see here?

14 A. This is another check to Hayat Nur for \$1,240. Memo
15 line says payroll.

16 Q. Ms. Roase, did you do one of those summary spreadsheets
17 analyzing the money into and out of The Free Minded
18 Institute account?

19 A. Yes, I did.

20 Q. I'm going to show you what's been marked, but not
21 admitted, as Government Exhibit M-29. Is this the chart you
22 created?

23 A. Yes, it is.

24 Q. Summarizing The Free Minded Institute bank account?

25 A. Yes.

1 MR. THOMPSON: Your Honor, I would move to admit
2 Government Exhibit M-29.

3 THE COURT: Any objection?

4 MR. ANDREW BIRRELL: No objection.

5 THE COURT: M-29 is admitted.

6 BY MR. THOMPSON:

7 Q. Ms. Roase, could you describe this chart for us?

8 A. Yes, this summarizes the U.S. Bank account that we just
9 looked at for The Free Minded Institute. The period of
10 review is from October 21, 2021, which is the account
11 opening date, through February 28th, 2022. And the only
12 source of funds for this account is Partners in Nutrition.

13 Q. How much money did Partners in Nutrition send to The
14 Free Minded Institute over that three or four-month period
15 at the end of 2021 and the beginning of 2022?

16 A. Nearly two and a half million dollars.

17 Q. And where did that money go?

18 A. Most of it went to Empire Cuisine & Market. That's
19 about 97 percent of what was deposited.

20 Q. During that same four-month time frame?

21 A. Yes.

22 Q. There's some alcohol/tobacco expense and other expense
23 listed on this account; is that right?

24 A. Right.

25 Q. Along with cash withdrawals?

1 A. Yes.

2 Q. What can you tell us about those charges?

3 A. The other expenses and the alcohol and tobacco expenses
4 are personal in nature. Lodging expense as well.

5 Q. Is that these debit card charges?

6 A. Yes.

7 Q. And I'm directing your attention back to Government
8 Exhibit O-141, this Free Minded Institute bank account.
9 Just looking at the November 2021 statement; is that right?

10 A. Yes.

11 Q. And what do we see here on the card withdrawals? What
12 does that mean?

13 A. Oh, yeah, so it would be like debit card purchases.

14 Q. Okay. And what kind of debit card purchases were made
15 on this -- with this account?

16 A. So you can see there's restaurants on here. Those are,
17 you know, personal expenditures. There's maybe gas
18 stations. Yeah, I think that's what makes up all those
19 transactions.

20 Q. And on page 12 there's additional expenses in November
21 of 2021 using The Free Minded Institute debit card?

22 A. Yes.

23 Q. El Taquito, apple.com?

24 A. Yes.

25 Q. Wolter Brothers Liquor?

1 A. Yes.

2 Q. Gopuff? Do you know what Gopuff is?

3 A. They do deliveries for tobacco and alcohol.

4 Q. Like an online delivery service?

5 A. Yes.

6 Q. Did you find any money going to buy foods to serve to
7 kids at Free Minded Institute sites?

8 A. I did not see any food expenses out of this account.

9 Q. Okay. You briefly mentioned Hayat Nur being the brother
10 of Abdimajid Nur, one of the other defendants in this case;
11 is that right?

12 A. The sister, yes.

13 Q. Okay. I'm going to talk a little bit about Abdimajid
14 Nur. Okay?

15 A. Okay.

16 Q. Before I do, I want to show you what's been marked as
17 Government Exhibit P-4, just not yet in evidence.

18 Do you recognize that photograph?

19 A. Yes.

20 Q. Who is depicted in it?

21 A. That is Abdimajid Nur.

22 MR. THOMPSON: Your Honor, I'd move to admit
23 Government Exhibit P-4.

24 MR. SAPONE: No objection.

25 THE COURT: P-4 is admitted.

1 MR. THOMPSON: Thank you, Your Honor.

2 BY MR. THOMPSON:

3 Q. Ms. Roase, earlier in the trial, going back a couple
4 weeks now, we looked at a lot of meal counts; is that right?

5 A. Yes.

6 Q. I want to direct your attention briefly back to some of
7 them and, specifically, Government Exhibit F-1k, which are
8 meal counts that were submitted to PIN. Okay?

9 A. Okay.

10 Q. And can you -- just looking at the bottom of page 1
11 here, what's the date on these meal counts?

12 A. It's for the week of May 2nd, 2021, to May 8th, 2021.

13 Q. And these were submitted to Partners in Quality Care or
14 Partners in Nutrition; is that right?

15 A. Yes.

16 Q. You recognize Autumn Holdings?

17 A. Yes.

18 Q. Is that one of the sites?

19 A. Yes. That was a Faribault site.

20 Q. And what does it say in terms of number of meals a day?

21 A. It's 500 meals prepared every day, snack and supper.

22 Q. And the signature of the site supervisor, whose name
23 appears?

24 A. Abdimajid.

25 Q. And if we were to page through this exhibit, we see lots

1 of meal counts; is that right?

2 A. Yes.

3 Q. For lots of sites?

4 A. For different sites, yeah.

5 Q. Submitted to Partners in Nutrition?

6 A. Yes.

7 Q. And whose name appears on all of them?

8 A. Abdimajid.

9 Q. During your investigation, did you also see emails sent
10 by Abdimajid Nur containing invoices related to Partners in
11 Nutrition and other places?

12 A. Yes.

13 Q. I want to show you an example, Government Exhibit D-22.

14 Let's take it from the top here. It's from Abdi
15 Nur. Do you recognize that email address?

16 A. I do.

17 Q. Whose email address is that?

18 A. That is Abdimajid Nur's email.

19 Q. Okay. And who is he sending this email to?

20 A. Abdiaziz Farah.

21 Q. And what is the subject line?

22 A. SFSP.

23 Q. And just as an example, page 2, is that one of the
24 invoices you were talking about?

25 A. Yes.

1 Q. And what's this invoice? Who is it from?

2 A. This is an invoice from Empire Enterprises LLC to Kara
3 Lomen at Partners in Quality Care.

4 Q. And whose entity is that?

5 A. That is Abdiaziz Farah's.

6 Q. Is anyone else a signatory on that account?

7 A. Yes, the Old National bank account, Abdimajid Nur was
8 also an account signer.

9 Q. And what is the -- how much is the invoice for from
10 Empire Enterprises to Partners in Nutrition?

11 A. It's for \$1,044,900.

12 Q. And you recognize those names listed under the
13 description?

14 A. I do. They were all food distribution sites.

15 Q. Now, this 19anur@gmail account, that was Abdimajid Nur's
16 email, correct?

17 A. Yes.

18 Q. Did the government obtain a search warrant for its
19 contents?

20 A. Yes.

21 Q. And during that search warrant, did the government also
22 obtain documents from his Google Drive?

23 A. Yes.

24 Q. And what's a Google Drive?

25 A. Google Drive is like a cloud-based service.

1 Q. When you say "cloud-based service," what do you mean?
2 What does it allow you to do?

3 A. It allows you to access the documents from anywhere, as
4 long as you have access to that drive.

5 Q. Documents can be saved to it?

6 A. Yeah, they can be saved to it.

7 Q. I want to show you a series of exhibits here that were
8 recovered from Abdimajid Nur's Google Drive. Okay?

9 A. Okay.

10 Q. First, Government Exhibit G-339. Is that -- is that --
11 are those documents that were obtained from his Google
12 Drive?

13 A. Yes.

14 Q. G-340. Photographs obtained from his Google Drive?

15 A. Yes.

16 Q. G-341. More images that were saved to his Google Drive?

17 A. Yes.

18 Q. G-342. A series of invoices that were saved to his
19 Google Drive, correct?

20 A. Yes.

21 Q. G-343. What is this?

22 A. These are claim estimates for the food sites, food
23 distribution sites.

24 Q. Also saved to his Google Drive, correct?

25 A. Yes.

1 Q. Government Exhibit G-344. Is this another document that
2 was saved to Abdimajid Nur's Google Drive?

3 A. Yes.

4 Q. G-345. Are these meal counts that were saved to his
5 Google Drive?

6 A. They are.

7 Q. Similar ones we just looked at?

8 A. Yes.

9 Q. G-346. Is this a series of consulting agreements that
10 were saved to his Google Drive?

11 A. Yes.

12 Q. G-347. Screenshots saved to his Google Drive?

13 A. Yes.

14 Q. G3 -- and G-349. That's it. All right.

15 MR. THOMPSON: Your Honor, I would move to admit
16 Government Exhibits G-339 to G-347.

17 THE COURT: And not G-349, correct?

18 MR. THOMPSON: I'm sorry. Not G-349. There is no
19 such exhibit.

20 THE COURT: Any objection?

21 MR. SAPONE: No objection.

22 THE COURT: G-339 through G-347 are admitted.

23 MR. THOMPSON: Thank you, Your Honor.

24 BY MR. THOMPSON:

25 Q. I want to start with Government Exhibit G-345. These

1 were a series of meal counts that were saved to Abdimajid
2 Nur's gmail account; is that right?

3 A. That's right.

4 Q. Look familiar?

5 A. Yes.

6 Q. How so?

7 A. These are all sites that were under this group.

8 Q. Meal counts for this group?

9 A. Right.

10 Q. The types of meal counts that were submitted to Partners
11 in Nutrition?

12 A. Yes.

13 Q. I'm going to show you now Government Exhibit G-342. Are
14 these more documents that were saved to Abdimajid Nur's
15 Google Drive?

16 A. Yes.

17 Q. And what do they consist of here?

18 A. These are invoices, various types of invoices.

19 Q. Okay. I want to start at page 19 here. What do we see
20 at page 19?

21 A. This is an invoice from Empire Cuisine & Market to
22 Partners in Quality Care.

23 Q. Okay. And the type of invoice that we've seen routinely
24 throughout this case?

25 A. Yes.

1 Q. Is that right?

2 A. Right.

3 Q. And there's lots of different versions of this that were
4 saved to Abdimajid Nur's Google Drive, right?

5 A. Right.

6 Q. I'm going to show you on the screen here -- okay. On
7 the left side of the screen is page 32 of Government
8 Exhibit G-342; is that right?

9 A. Yes.

10 Q. And, again, it's an invoice from Empire Cuisine &
11 Market; is that right?

12 A. Yes.

13 Q. And how is it spelled up in the upper left-hand corner
14 of the invoice?

15 A. "Cuisine" is misspelled. And "Marschall" is --
16 actually, there's a lot of misspellings. "Marschall" is
17 misspelled. "Shakopee" is misspelled.

18 Q. And on the right side of the screen on page 33, the next
19 page of this exhibit, there's another invoice that says
20 Empire Cuisine & Market.

21 A. Right.

22 Q. Do they differ?

23 A. They do.

24 Q. How so?

25 A. Well, the name is different. The address is different.

1 The phone number is different.

2 Q. Okay. I direct your attention here on page, on the left
3 here, page 37 of Government Exhibit G-342.

4 And what do we see here?

5 A. This is an invoice. It's -- it's spelled similarly to
6 the one on the left, except now it has an "s" in cuisine.
7 "Marschall" is still spelled wrong. "Shakopee" is spelled
8 right. Phone number is the same.

9 Q. And there's a series of these invoices that are saved on
10 his Google Drive; is that correct?

11 A. Yes.

12 Q. On page 38, what do we see?

13 A. This is an Afrique Hospitality Group invoice for
14 ThinkTechAct Foundation.

15 Q. On page 41, what do we see here?

16 A. This is a different type of Empire Cuisine & Market
17 invoice.

18 Q. Hard to read that one.

19 A. Yep.

20 Q. Page 35, what do we see?

21 A. This is a ThinkTechAct Foundation invoice to Feeding Our
22 Future.

23 Q. Page 23 of Government Exhibit G-342. Saved to Abdimajid
24 Nur's Google Drive?

25 A. Yes.

1 Q. What is this?

2 A. This is a Bushra Wholesale LLC invoice to Partners in
3 Quality Care.

4 Q. What's the amount on this invoice?

5 A. \$439,425.

6 Q. Saved to Abdimajid Nur's Google Drive?

7 A. Yes.

8 Q. On page 27 do we have another invoice saved to his
9 drive?

10 A. Yes.

11 Q. Who is -- what entity is invoicing here?

12 A. It's Bushra Wholesale LLC invoicing Partners in Quality
13 Care.

14 Q. Now, I want to direct your attention to page 82 of
15 Government Exhibit G-342.

16 Was this also saved to Abdimajid Nur's Google
17 Drive?

18 A. Yes.

19 Q. What is it?

20 A. This is a template, it appears. This is how the other
21 invoices looked in appearance.

22 Q. Now, we'll make the comparison here. On the left side
23 is that template; is that right?

24 A. Yes.

25 Q. And on the right side of the screen, what do we see?

1 A. The top part is -- is the same. The Afrique Hospitality
2 Group, you know, where it says Your Company and then the
3 address, the phone number. And then instead of saying
4 "Purchase Order," it says "Invoice."

5 Q. Similar for Empire Cuisine & Market on page 37 of
6 Government Exhibit G-342?

7 A. Yes, that's similar.

8 Q. How about on page 36, this invoice from The Free Minded
9 Institute?

10 A. Yes, that one is also similar.

11 Q. Page 35, invoice from the ThinkTechAct Foundation?

12 A. Yes, similar.

13 Q. All saved on Abdimajid Nur's Google Drive?

14 A. Yes.

15 Q. I want to show you now what's been admitted as
16 Government Exhibit G-331, which is an email from Abdimajid
17 Nur to Hadith Ahmed and Abdiaziz Farah; is that right?

18 A. Yes, that's right.

19 Q. On May 11, 2021?

20 A. Yes.

21 Q. What's the subject line?

22 A. The subject line is Feeding Our Future.

23 Q. There's an attachment to this email; is that right?

24 A. Yes.

25 Q. And what kind of document is attached?

1 A. It looks like it's an Excel file that's called Feeding
2 Our Future invoice.

3 Q. And there's also a series of links here in the body of
4 email; is that right?

5 A. There is.

6 Q. What are these links to?

7 A. They're links to the Google Drive.

8 Q. Abdimajid Nur's Google Drive?

9 A. Yes.

10 Q. Where those documents were saved?

11 A. Yes, that's right.

12 Q. And on page 2 of Government Exhibit G-331, what do we
13 see?

14 A. This is a ThinkTechAct Foundation invoice to Feeding Our
15 Future.

16 Q. Does it follow the same template that was saved to
17 Abdimajid Nur's Google Drive?

18 A. Yes, it does.

19 Q. What's the amount of this invoice?

20 A. \$810,750.

21 Q. I show you now what's been admitted as Government
22 Exhibit D-23. Is this another email from Abdimajid Nur?

23 A. Yes, it is.

24 Q. Who is this email to?

25 A. This is to Kara Lomen and julius@partnersinqualitycare.

1 And Mahad Ibrahim and Abdiaziz Farah is copied on the email.

2 Q. Do you know if he uses the email

3 julius@partnersinqualitycare?

4 A. Yeah. Julius is Julius Scarver of The Free Minded

5 Institute.

6 Q. What's the date of this email?

7 A. May 3rd, 2021.

8 Q. Does it contain a series of links?

9 A. It does.

10 Q. And what are those links to?

11 A. They are links to the Google Drive.

12 Q. Abdimajid Nur's Google Drive?

13 A. Abdimajid Nur's, yes.

14 Q. Showing you now what -- showing you now what I'm not
15 sure has been admitted, so -- as Government Exhibit E-32.

16 THE COURT: Just one moment.

17 MR. THOMPSON: It has been admitted.

18 THE COURT: Okay.

19 BY MR. THOMPSON:

20 Q. Do you recognize Government Exhibit E-32?

21 A. Yes.

22 Q. And this is an email from who to who?

23 A. It's from Abdimajid Nur to Said Farah's email and copied
24 on it is Abdiaziz Farah.

25 Q. What's the subject line?

1 A. Somali Refugee Resettlement.

2 Q. And what is attached to it here?

3 A. It look like it's two Excel files. One is called
4 Willmar attendance, March; and the other is Rochester
5 attendance, March.

6 Q. And then in the body of the email there's a series of
7 links; is that correct?

8 A. Yes.

9 Q. What are those links to?

10 A. Those links are to Abdimajid Nur's Google Drive.

11 Q. Now, I want to talk a little bit about Abdimajid Nur's
12 sister. Okay?

13 A. Okay.

14 Q. Hayat Nur.

15 A. Yes.

16 Q. Defendant in this case?

17 A. Yes.

18 Q. I'll show you what's been marked, but not admitted, as
19 Government Exhibit P-8. Do you recognize that photograph?

20 A. Yes, I do.

21 Q. Who is depicted in it?

22 A. That is Hayat Nur.

23 MR. THOMPSON: Your Honor, I would move to admit
24 Government Exhibit P-8.

25 THE COURT: Any objection?

1 MR. BRANDT: No objection.

2 THE COURT: P-8 is admitted.

3 MR. THOMPSON: Thank you.

4 BY MR. THOMPSON:

5 Q. Now, I want to show you another exhibit that's not yet
6 in evidence, Government Exhibit F-6.

7 Is this an email from Abdimajid Nur to his sister
8 Hayat Nur?

9 A. Yes, it is.

10 Q. On June 21st of 2021?

11 A. Yes.

12 MR. THOMPSON: Your Honor, I would move to admit
13 Government Exhibit F-6.

14 MR. BRANDT: No objection.

15 THE COURT: F-6 is admitted. It's conditionally
16 admitted.

17 MR. THOMPSON: Thank you, Your Honor.

18 BY MR. THOMPSON:

19 Q. Ms. Roase, what's the date on this email from Abdimajid
20 Nur to his sister Hayat?

21 A. It's June 21, 2021.

22 Q. What's the subject line?

23 A. It's Weekly Consolidated Meal Counts.

24 Q. And then it contains a list; is that right?

25 A. Yes.

1 Q. Can you describe that list?

2 A. It's a series of food distribution sites; and there's a
3 number behind it, which appears to be meal counts.

4 Q. The number of meals that later appeared on the meal
5 counts?

6 A. Right.

7 Q. And at the bottom of the email, Abdimajid passes on
8 along -- passes along a message to his sister; is that
9 right?

10 A. Yes.

11 Q. Could you read what Abdimajid Nur wrote to his sister
12 Hayat?

13 A. Yes. It says, "An easy trick I usually do while doing
14 these: For all the sites that have the same meal count,
15 like Four Seasons, Life Style and so on, after I save the
16 document, I would just then bring up the same document again
17 and just change the site name and make sure to save it as a
18 new document because everything else will be the same,
19 because it's the same month and the dates don't change. It
20 will save you so much time. Let me know if you have any
21 questions."

22 Q. And then at the top of this message there's a link; is
23 that correct?

24 A. Yes.

25 Q. And what is that a link to?

1 A. That's a link to Abdimajid Nur's Google Drive.

2 Q. Where those templates were saved?

3 A. Right.

4 Q. I want to show you now what's been marked, but not yet
5 admitted, as Government Exhibit F-7. Is this another email
6 from Abdimajid Nur to his sister Hayat?

7 A. Yes.

8 Q. It's one day later on June 22nd of 2021; is that right?

9 A. Yes, it is.

10 MR. THOMPSON: Your Honor, I'd move to admit
11 Government Exhibit F-7.

12 MR. BRANDT: No objection.

13 THE COURT: F-7 is conditionally admitted.

14 BY MR. THOMPSON:

15 Q. Could you describe this email from Abdimajid Nur to
16 Hayat?

17 A. Yeah, it looks like it's -- it says Abdi Majid Nur. And
18 the email is anur@thinktechact.org. And it's to
19 hayatnur861@gmail.com. Subject is weekly consolidated meal
20 counts.

21 Q. And is there a link attached to it?

22 A. Yes, there is a link to Abdimajid Nur's Google Drive.

23 Q. And what does it say on the link?

24 A. It says Weekly Consolidated Meal Counts.

25 Q. I'm going to show you now what's been marked, but not

1 yet admitted, as Government Exhibit F-9, which is an email
2 from Hayat Nur -- I want to show you F-13, I think -- an
3 email from Hayat Nur to her brother Abdimajid on June 25th,
4 2021; is that right?

5 A. Yes.

6 Q. Government Exhibit F-13?

7 A. Yes.

8 MR. THOMPSON: Your Honor, I would move to admit
9 Government Exhibit F-13.

10 MR. BRANDT: No objection.

11 THE COURT: F-13 is conditionally admitted.

12 BY MR. THOMPSON:

13 Q. Ms. Roase, could you describe this email?

14 A. Yeah. It's from Hayat Nur, her email
15 hayatnur861@gmail.com, to anur@thinktechact.org, which is
16 what we saw in the previous one. It was Abdimajid Nur's
17 email. Subject is Weekly Meal Count. And the attachment is
18 Billing_Docs.

19 Q. And what is attached to this email starting at page 2?

20 A. These are the weekly meal counts, yeah, for each of the
21 different sites.

22 Q. From Hayat Nur to her brother Abdimajid?

23 A. Yes.

24 Q. And it looks like something is typed in as the signature
25 of site supervisor; is that right?

1 A. Yes.

2 Q. What name is typed in there?

3 A. It is Shamrock Court.

4 Q. I want to go back to Government Exhibit G-342, which is
5 these invoices saved to Abdimajid Nur's Google Drive. Okay?

6 A. Okay.

7 Q. And I want to start on page 9 here. What do we see on
8 page 9 of Government Exhibit G-342?

9 A. This appears to be an invoice that says Afro Produce LLC
10 on the top left. And then it's an invoice with a number of
11 items on the bottom that were supposedly purchased, with the
12 case and the unit price and the dollar amount.

13 Q. Invoice Number 9132?

14 A. Yes.

15 Q. And on page 10 it looks like we have the same invoice
16 saved; is that right?

17 A. Yes.

18 Q. 9132?

19 A. Yes.

20 Q. On page 11, what do we see here?

21 A. It looks like the invoice number is now 9133. I believe
22 the amounts changed.

23 Q. And on page 12? I'm going to toggle back and forth
24 between page 11 and page 12 of this exhibit. Okay?

25 A. Okay.

1 Q. What do you see?

2 A. So the total down at the bottom remains the same,
3 \$12,531.85; however, the contents, the description of what
4 was supposedly purchased changes.

5 Q. It's being edited in Abdimajid Nur's Google Drive?

6 A. Yes.

7 Q. All right. Here they are side by side; is that right?

8 A. Yeah, page 11 and page 12.

9 Q. Invoice number the same?

10 A. Yes, it is.

11 Q. Date the same?

12 A. Yes.

13 Q. What's different?

14 A. So the milk, it looks like it's higher on the left side.
15 Nesquik milk higher on the left side. Potatoes, onions,
16 tomatoes. It looks like it's all higher on the left side.

17 Q. All right. So being changed in Abdimajid Nur's Google
18 Drive, is that what I'm taking?

19 A. Yes.

20 Q. Now, I want to show you what's been marked, but not yet
21 admitted, as Government Exhibit D-42.

22 Do you recognize Government Exhibit D-42?

23 A. Yes, I do.

24 Q. Is this an email from Hayat Nur to herself on
25 December 21st of 2021?

1 A. Yes.

2 MR. THOMPSON: Your Honor, I would move to admit
3 Government Exhibit D-42.

4 THE COURT: Any objection?

5 MR. BRANDT: No objection.

6 THE COURT: D-42 is admitted.

7 BY MR. THOMPSON:

8 Q. What's the subject line of the email that Hayat Nur
9 emailed to herself on December 21st of 2021?

10 A. It's Master Document.

11 Q. There's an attachment; is that right?

12 A. Yeah. It looks like there's two attachments.

13 Q. And what are they called?

14 A. There's a Word document that's called Master Document
15 and a PDF that's Invoice 1.

16 Q. And I'm turning to pages 2 and 3 of this exhibit. Do
17 you recognize this document?

18 A. Yes. It was what we had just gone over.

19 Q. One of the invoices saved to Abdimajid Nur's Google
20 Drive?

21 A. Yes.

22 Q. Ones that were being altered?

23 A. Yes.

24 Q. And in the body of the email that Hayat Nur sent to
25 herself, what did she write?

1 A. It says, "You can edit Master document (don't save it as
2 PDF)."

3 Q. Turning to page 2, what document can be edited, if not
4 saved as a PDF?

5 A. This invoice.

6 Q. From what company?

7 A. From Afro Produce.

8 Q. A food invoice?

9 A. Yes, a food invoice.

10 Q. I'm going to show you now what's been marked as
11 Government Exhibit D-44. Do you recognize Government
12 Exhibit D-44?

13 A. Yes, I do.

14 Q. Is this another email that Hayat Nur sent to her
15 brother?

16 A. Yes.

17 Q. This time in January of 2022?

18 A. Yes.

19 MR. THOMPSON: Your Honor, I would move to admit
20 Government Exhibit D-44.

21 THE COURT: Any objection?

22 MR. BRANDT: No objection.

23 THE COURT: D-44 is conditionally admitted.

24 BY MR. THOMPSON:

25 Q. Ms. Roase, it looks like Hayat Nur sent this email to

1 herself on December 22nd; is that right?

2 A. Yes.

3 Q. What was the subject line of that email?

4 A. This says 5 Invoices.

5 Q. And then she forwarded it to her brother Abdimajid?

6 A. Yes.

7 Q. When did she do that?

8 A. January 4th, 2022.

9 Q. There's a series of attachments; is that right?

10 A. Yes.

11 Q. What kind of documents are they?

12 A. They are -- there's five Word documents, and they all
13 say Invoice, and then there's a number following it.

14 Q. Invoice 1, 2, 3, 4, 5?

15 A. Yes.

16 Q. Turning your attention to page 2, what's the first
17 invoice?

18 A. This is -- appears to be an Afro Produce invoice, and
19 the invoice number is 9133.

20 Q. Is that one of the numbers that appear saved in
21 Abdimajid Nur's Google Drive?

22 A. Yes.

23 Q. How about page 3 of Government Exhibit D-44? What do we
24 see here?

25 A. This is another Afro Produce invoice, and the invoice

1 number is 9132.

2 Q. Page 3?

3 A. This one is invoice Number 9134.

4 Q. Page 5?

5 A. Invoice Number 9135.

6 Q. And page 6?

7 A. Invoice Number 9136.

8 Q. Now to be clear, Ms. Roase, do Hayat Nur or her brother
9 Abdimajid work for Afro Produce?

10 A. They do not.

11 Q. Do they have any relationship to Afro Produce?

12 A. Not that I know of.

13 Q. Did you see invoices like this from Afro Produce during
14 the investigation?

15 A. Yes, I did.

16 Q. Where did you see them?

17 A. They were in -- I believe they were in -- in other
18 emails.

19 Q. Were they submitted in support of claims, Federal Child
20 Nutrition Program claims for reimbursement?

21 A. Yes, they were.

22 Q. Afro Produce invoices?

23 A. Yes.

24 Q. Thank you.

25 I want to show you now what's been marked, but not

1 yet admitted, as Government Exhibit 350. Is this another --
2 sorry. Government Exhibit D-40.

3 Do you recognize -- or is Government Exhibit D-40
4 an email from Abdimajid Nur to his sister Hayat Nur in
5 December of 2021?

6 A. Yes, it is.

7 Q. Obtained pursuant to a search warrant?

8 A. Yes.

9 MR. THOMPSON: Your Honor, I would move to admit
10 Government Exhibit D-40.

11 THE COURT: Any objection?

12 MR. BRANDT: No objection.

13 THE COURT: D-40 is conditionally admitted.

14 BY MR. THOMPSON:

15 Q. Ms. Roase, could you describe this email?

16 A. Yeah, it looks like it's -- it says it's from Abdimajid
17 Nur, in parentheses, (via Google Sheets) to
18 hayatnur861@gmail. And the subject is Spreadsheet shared
19 with you, November TTA invoice. And it appears to be an
20 Excel spreadsheet.

21 Q. Okay. And that's on December 14th; is that right?

22 A. Yes.

23 Q. I want to show you now what's been marked, but not yet
24 admitted, as Government Exhibit D-45.

25 Do you recognize -- or is this another email from

1 Abdimajid Nur to Hayat Nur?

2 A. Yes, it is.

3 Q. On January 4th of 2022?

4 A. Yes.

5 MR. THOMPSON: Your Honor, I'd move to admit
6 Government Exhibit D-45.

7 THE COURT: Any objection?

8 MR. BRANDT: No objection.

9 THE COURT: D-45 is conditionally admitted.

10 BY MR. THOMPSON:

11 Q. Ms. Roase, what is this email?

12 A. This is very similar to the last one. It's from
13 Abdimajid Nur, in parentheses, (via Google Sheets) to Hayat
14 Nur. And the subject is Spreadsheet shared with you,
15 November Invoice FMI.

16 Q. And there's a link; is that right?

17 A. Yes.

18 Q. What is that a link to?

19 A. That's a link to the Google Drive of Abdimajid Nur's.

20 Q. And FMI, are you familiar with those initials?

21 A. Yes. It's The Free Minded Institute.

22 Q. I show you what's been marked, but not yet admitted, as
23 Government Exhibit D-46.

24 Is this another email from Abdimajid Nur to his
25 sister Hayat?

1 A. Yes.

2 Q. On January 4th, 2021?

3 A. Yes.

4 MR. THOMPSON: Your Honor, I would move to admit
5 Government Exhibit D-46.

6 THE COURT: Any objection?

7 MR. BRANDT: No objection.

8 THE COURT: D-46, conditionally admitted.

9 BY MR. THOMPSON:

10 Q. What does Abdimajid -- what did Abdimajid Nur email to
11 his sister Hayat Nur on January 4th of 2022 in this exhibit?

12 A. It appears to be another spreadsheet that's shared from
13 Abdimajid Nur's Google Drive titled October Invoice
14 Empire-FMI.

15 Q. I'd like to show you now what's been marked, but not yet
16 admitted, as Government Exhibit D-48.

17 Is this an email from Hayat Nur to Kara Lomen and
18 Abdiaziz Farah?

19 A. Yes, it is.

20 Q. Was this sent the following day January 5th, 2022?

21 A. Yes, it is.

22 MR. THOMPSON: Your Honor, I'd move to admit
23 Government Exhibit D-48.

24 MR. BRANDT: No objection.

25 THE COURT: D-48 is conditionally admitted.

1 BY MR. THOMPSON:

2 Q. Ms. Roase, could you describe this email for the jury?

3 A. Yeah. The subject is December's Invoices and Total
4 Attendance Reports. And there appears to be dozens and
5 dozens of attachments.

6 Q. Again, from Hayat Nur to Kara Lomen at PIN and Abdiaziz
7 Farah?

8 A. Yes.

9 Q. I specifically want to direct your attention to page 61.
10 What do we see here on page 61?

11 A. It's a ThinkTechAct Foundation invoice to Partners in
12 Quality Care.

13 Q. What's the date on it?

14 A. The due date is January 10th, 2022 -- oh, I'm sorry --
15 submitted on January 5th, 2022.

16 Q. And what's the amount of the invoice that Hayat Nur sent
17 to Kara Lomen on January 5th, 2022?

18 A. The subtotal is \$2,195,796.45.

19 Q. Ms. Roase, as far as you know, did Hayat Nur work for
20 the ThinkTechAct Foundation?

21 A. No.

22 Q. That's significant to you?

23 A. Yes, that is significant.

24 Q. How so?

25 A. I am not sure why she would be creating something for an

1 entity that she does not work for.

2 Q. Similar to those invoices for Afro Produce?

3 A. Yes, right.

4 Q. On page 63 of this Exhibit D-48, Hayat Nur also sends an
5 invoice to Partners in Quality Care from Somali Community
6 Resettlement; is that right?

7 A. Yes.

8 Q. What's the amount of that invoice?

9 A. \$245,310.

10 Q. As far as you know, does Hayat Nur work for the Somali
11 Community Resettlement?

12 A. No.

13 Q. Show you now what's been marked as Government
14 Exhibit D-49. Is this another email from Hayat Nur to Kara
15 Lomen?

16 A. Yes, it is.

17 Q. On January 6th of 2022?

18 A. Yes.

19 Q. Copying Abdiaziz Farah?

20 A. Yes.

21 MR. THOMPSON: Your Honor, I would move to admit
22 Government Exhibit D-49.

23 MR. BRANDT: No objection.

24 THE COURT: D-49 is conditionally admitted.

25

1 BY MR. THOMPSON:

2 Q. Can you describe this email from Hayat Nur to Kara Lomen
3 and Abdiaziz Farah?

4 A. Yeah. The subject line is FMI Invoice, which is again
5 The Free Minded Institute. It's dated January 6, 2022, or
6 at least that's when the email was submitted. And there's
7 probably about a dozen different attachments for -- appears
8 to be Free Minded Institute invoices.

9 Q. And on page 2, is the first attachment an invoice from
10 The Free Minded Institute?

11 A. Yes.

12 Q. To Partners in Quality Care?

13 A. Yes.

14 Q. And what is the amount claimed on this invoice that
15 Hayat Nur sent to Kara Lomen?

16 A. It's \$868,330.25.

17 Q. Sent to Kara Lomen on January 6th of 2022?

18 A. Yes.

19 Q. By Hayat Nur?

20 A. Yes.

21 Q. I want to show you now what's been marked, but not yet
22 admitted, as Government Exhibit D-51.

23 Is this another email from Hayat Nur to Kara Lomen
24 on January 6th of 2022?

25 A. Yes.

1 Q. Also copying Abdiaziz Farah?

2 A. Yes.

3 MR. THOMPSON: Your Honor, I'd move to admit
4 Government Exhibit D-51.

5 MR. BRANDT: No objection.

6 THE COURT: D-51 is conditionally admitted.

7 BY MR. THOMPSON:

8 Q. Ms. Roase, could you describe this email briefly?

9 A. Yeah. So it's a -- Hayat Nur is sending an email to
10 Kara Lomen and copying Abdiaziz Farah with a subject line
11 TTA -- it's spelled wrong, but I believe it's intended to be
12 invoice. And TTA would be ThinkTechAct Foundation. And
13 there's maybe about two dozen invoices attached.

14 Q. I'm going to direct your attention to page 38. Is this
15 one of those invoices?

16 A. Yes, it is.

17 Q. From ThinkTechAct Foundation?

18 A. Yes.

19 Q. To Partners in Nutrition?

20 A. Yes.

21 Q. On page 39, the amount of the invoice again?

22 A. \$2,195,796.45.

23 Q. Showing you now what's been marked as Government
24 Exhibit D54.

25 Is this another email from Hayat Nur to Kara Lomen

1 and Abdiaziz Farah on January 11th of 2022?

2 A. Yes, it is.

3 MR. THOMPSON: Your Honor, I would move to admit
4 Government Exhibit D-54.

5 MR. BRANDT: No objection.

6 THE COURT: D-54 is conditionally admitted.

7 BY MR. THOMPSON:

8 Q. Ms. Roase, could you describe this email?

9 A. This is an email from Hayat Nur to Kara Lomen copying
10 Abdiaziz Farah. Subject line is Clifton Invoice for
11 December. It's dated January 11, 2022, and there are a
12 number of attachments that appear to all be related to
13 Clifton Townhomes.

14 Q. Is that one of the sites?

15 A. Yes.

16 Q. What did Hayat Nur write in the body of the email?

17 A. It says, "Kara, please see attached invoice for Clifton
18 that we missed to include on the previous invoices. Best."

19 Q. And on page 2, is this an invoice from ThinkTechAct
20 Foundation to Partners in Nutrition?

21 A. Yes.

22 Q. What's the amount claimed for this -- meals purportedly
23 served at the Clifton Townhome site?

24 A. \$102,029.60.

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

1 Exhibit D-57, which is an email from Abdiaziz Farah to Hayat
2 Nur and her brother Abdimajid Nur on January 12th of 2022.

3 Do you see that?

4 A. Yes, I do.

5 Q. What's the subject line of the email?

6 A. The subject is Register-Invoices.

7 Q. Is there an attachment?

8 A. Yes, there is an Excel attachment that is by the same
9 name.

10 Q. This email was sent at 11:17 in the morning; is that
11 right?

12 A. Yes.

13 Q. As I page to the attachment. What do we see here on
14 page 2 of this exhibit?

15 A. It appears to be a list of dates and a payee with an
16 amount, a type and an account.

17 Q. Do you recognize the entities listed here?

18 A. I do. I see Bushra Wholesalers, Empire Cuisine, Empire
19 Enterprises.

20 Q. More on page 3?

21 A. Yes. There's also Nur Consulting.

22 Q. And that's on January 17th at 11:00 a.m.

23 I'd like to show you now what's been admitted as
24 Government Exhibit D-56. Did Hayat Nur respond to that
25 email later that day?

1 A. Yes.

2 Q. To Abdiaziz Farah's email, that is. And does she have
3 attachments to her email here on January 12th?

4 A. Yes.

5 Q. And as I page through them, what do we see?

6 A. They're invoices from, it looks like, Empire Cuisine and
7 Empire Enterprises. There was -- I saw Minnehaha
8 Transportation, Nur Consulting. And they are all invoices I
9 want to say for ThinkTechAct Foundation.

10 Q. Okay. And how do those compare to the list that
11 Abdiaziz Farah sent her earlier that day?

12 A. They are all very similar, although I don't recall
13 seeing Minnehaha Transportation from the previous email, but
14 everything else was on there.

15 Q. Showing you there --

16 A. Oh, yes, I see it. Yep, February 18th, 2021.

17 Q. So what did Hayat Nur do in response to Abdiaziz Farah's
18 email here?

19 A. It appears that the invoices were created with this
20 information.

21 Q. By?

22 A. By Hayat Nur.

23 Q. I want to show you what's been marked, but not yet
24 admitted, as Government Exhibit D-59.

25 Do you see Government Exhibit D-59?

1 A. Yes, I do.

2 Q. Is this a forward -- is this an email where Abdiaziz
3 Farah forwards Hayat Nur's email to Mahad Ibrahim?

4 A. Yes.

5 Q. Later that day on January 12th of 2022?

6 A. Yes.

7 MR. THOMPSON: Your Honor, I would move to admit
8 Government Exhibit D-59.

9 MR. BRANDT: No objection.

10 THE COURT: D-59 is conditionally admitted.

11 MR. THOMPSON: Thank you, Your Honor.

12 BY MR. THOMPSON:

13 Q. Okay. We can see the chain here at the bottom of
14 Government Exhibit D-59. Is that right, Ms. Roase?

15 A. Right.

16 Q. And what do we see at the top? Abdiaziz Farah forwards
17 those invoices; is that correct?

18 A. Yes, the same invoices.

19 Q. Who does he forward them to?

20 A. To Mahad Ibrahim.

21 Q. And what does he say in the body of the email?

22 A. It says, "Here you go."

23 Q. I show you now what's been admitted as Government
24 Exhibit D-68. Actually, I'm going to show you now on the
25 right side of the screen Government Exhibit D-68.

1 Do you see that?

2 A. Yes, I do.

3 Q. What's depicted -- or can you tell us about this email
4 at Government Exhibit D-68?

5 A. It's an email from Abdimajid Nur to Said Farah's email
6 account, and it's a forwarded message that says
7 "Registers-Invoices."

8 Q. What's the date on this email?

9 A. It's January 23rd, 2022.

10 Q. Did anything significant happen between the email on the
11 left here, D-59, from Abdiaziz Farah to Mahad Ibrahim on
12 January 12th and the email on the right, D-68, when
13 Abdimajid Nur forwarded the same invoices to Said Farah on
14 January 23rd of 2022?

15 A. Yes. We conducted search warrants on January 20th,
16 2022.

17 Q. And what day in January? January 20th you said?

18 A. Yes.

19 Q. Okay. I'd like to show you now what's been marked, but
20 not yet admitted, as Government Exhibit G-294.

21 Is this an email from Abdimajid Nur to himself on
22 January 27th of 2022?

23 A. Yes.

24 MR. THOMPSON: Your Honor, I would move to admit
25 Government Exhibit 294.

1 MR. SAPONE: No objection.

2 THE COURT: G-294 is conditionally admitted.

3 BY MR. THOMPSON:

4 Q. Ms. Roase, could you describe this email from Abdimajid
5 Nur to himself on January 27th of 2022?

6 A. The -- there's no subject, but the attachment says
7 "Consulting Agreement."

8 Q. Can you describe on page 2 this consulting agreement
9 that he emailed to himself on January 27th of 2022?

10 A. The consulting agreement says that it is dated 4th day
11 of April 2021 between Bushra Wholesale LLC and Empire
12 Cuisine & Market and Nur Consulting on the bottom there.

13 Q. And Nur Consulting LLC, again, whose company is that?

14 A. That's Abdimajid Nur's.

15 Q. And he's the contractor or the consultant, I take it,
16 according to this agreement?

17 A. Right, yep.

18 Q. And who are the clients identified on this consulting
19 agreement?

20 A. The clients appear to be both Bushra Wholesale LLC and
21 Empire Cuisine & Market.

22 Q. Whose entities are those?

23 A. Bushra Wholesale LLC is Said Farah and Abdiwahab Aftin,
24 and Empire Cuisine & Market is Abdiaziz Farah and Mohamed
25 Ismail's.

1 Q. Now, he emailed this to himself, Abdimajid Nur did, on
2 January 27th of 2022; is that right?

3 A. Yes.

4 Q. One week after the search warrants were executed?

5 A. Right.

6 Q. What's the date on the consulting agreement that he
7 emailed to himself that day?

8 A. It says April 4th, 2021.

9 Q. Eight months earlier?

10 A. Yes.

11 Q. Directing your attention to page 8 of Government
12 Exhibit 294.

13 Is this consulting agreement that Abdimajid Nur
14 emailed to himself on January of 2022 signed?

15 A. It is not signed.

16 Q. I'm going to show you now what's been admitted as
17 Government Exhibit C-295 -- G-295. I'm sorry.

18 One moment, Your Honor.

19 I'm going to show you an exhibit that's not yet
20 admitted into evidence, which is Government Exhibit G-295.

21 Is this another email from Abdimajid Nur to
22 himself on that same day, January 27th of 2022?

23 A. Yes, it is.

24 MR. THOMPSON: Your Honor, I'd move to admit
25 Government Exhibit G-295.

1 THE COURT: Any objection?

2 MR. SAPONE: No objection.

3 THE COURT: G-295 is conditionally admitted.

4 BY MR. THOMPSON:

5 Q. Ms. Roase, could you describe this email for the jury?

6 A. Yeah. This also does not have a subject. And the
7 attachments, it appears there's a consulting agreement with
8 Bushra Wholesale, consulting agreement with Empire Cuisine &
9 Market, and a consulting agreement with ThinkTechAct
10 Foundation.

11 Q. Okay. I'm going to walk through the attachment here
12 starting on page 2 of this exhibit. Okay?

13 A. Okay.

14 Q. What do we see here on page 2?

15 A. So this one is also a consulting agreement dated 4th day
16 of April; however, now it's just Empire Cuisine & Market
17 identified as the client and Nur Consulting LLC as the
18 contractor.

19 Q. And how does that compare to the one we just looked at?

20 A. The one before had Bushra Wholesale as the client as
21 well.

22 Q. I'm showing you the comparison between the first email
23 that Abdimajid Nur sent to himself on January 27th at
24 Government Exhibit G-294 and the one he sent to himself
25 later that -- and at another time that day; is that correct?

1 A. Yes.

2 Q. Okay. What's the comparison between these two
3 consulting agreements?

4 A. So the -- it looks like the -- probably the only thing
5 that changed was that now it does not identify both Bushra
6 Wholesale and Empire Cuisine as a client and, instead, just
7 identifies Empire Cuisine & Market as the client.

8 Q. That's at the top here?

9 A. Yes.

10 Q. Okay. On this other email, Government Exhibit G-295,
11 there's more than one consulting agreement attached to that
12 one, correct?

13 A. Yes.

14 Q. This one starting on page 2 between Nur Consulting and
15 Empire Cuisine & Market?

16 A. Yes.

17 Q. Is it signed?

18 A. It is not signed.

19 Q. Another one starting on page 9; is that right?

20 A. Yes.

21 Q. Looks the same except a little different?

22 A. It looks the same except for the client is now
23 ThinkTechAct Foundation.

24 Q. And Nur Consulting?

25 A. And Nur Consulting.

1 Q. Same date, April 4th, 2021?

2 A. Yes.

3 Q. Turning your attention to page 15, which is the last
4 page of that agreement, is it signed?

5 A. It is not signed.

6 Q. Now, directing your attention to page 16 of Government
7 Exhibit G-295 on the left side of the screen here, what do
8 we see?

9 A. It looks like it's an agreement between Bushra Wholesale
10 LLC as the client and Nur Consulting as the contractor.

11 Q. Thank you.

12 Is that one signed?

13 A. It is not signed.

14 Q. Are any of them signed?

15 A. No.

16 MR. THOMPSON: One moment, Your Honor.

17 BY MR. THOMPSON:

18 Q. Directing your attention to Government Exhibit G-346,
19 which are documents that were found in Abdimajid Nur's
20 Google Drive, what do we see here?

21 A. This is a consulting agreement 4th day of April 2021
22 between Bushra Wholesale LLC as the client and Nur
23 Consulting as the contractor.

24 Q. Same one that he emailed to himself on January 27th of
25 2022?

1 A. Yes.

2 Q. As I keep scrolling through, there's a bunch of them
3 here, correct?

4 A. Yes.

5 Q. All saved to Abdimajid Nur's Google Drive?

6 A. Right.

7 Q. And at page 50 we see -- page 50 is Bushra Wholesale,
8 correct?

9 A. Yes.

10 Q. Page 51, Empire Cuisine & Market?

11 A. Yes.

12 Q. Page 52, ThinkTechAct?

13 A. ThinkTechAct.

14 Q. Page 53?

15 A. Bushra Wholesale.

16 Q. And page 54?

17 A. Bushra Wholesale and Empire Cuisine as the client.

18 Q. Thank you, Ms. Roase.

19 THE COURT: We can take a break at this time. Is
20 that --

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

22 THE COURT: All right. Let's return at 3:20,
23 everybody. All right? Thank you.

24 All rise for the jury.

25 (Recess taken at 3:03 p.m. till 3:22 p.m.)

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IN OPEN COURT

(JURY PRESENT)

THE COURT: You may all be seated.

Counsel, you may continue.

MR. THOMPSON: Thank you, Your Honor.

BY MR. THOMPSON:

Q. Ms. Roase, before the break we looked at an email that Hayat Nur sent to Abdiaziz Farah on January 12th of 2022; is that right?

A. Yes.

Q. And it contained a series of attachments; is that right?

A. Yes, that's right.

Q. And these were -- well, what were the attachments?

A. It looks like they were -- they were invoices for various entities.

Q. And what prompted her to send these completed invoices?

MR. SAPONE: Objection.

THE COURT: Overruled.

You may answer if you can.

BY MR. THOMPSON:

Q. Ms. Roase, I'll show you Government Exhibit D-57. Is this an email from Abdiaziz Farah to Hayat Nur and Abdimajid Nur earlier that day on January 12th?

A. Yes.

Q. What's attached to it?

1 A. Yeah, it looks like it's a list of dates with payees,
2 payments, types and -- yeah, it looks like it's -- it's a
3 list of items to have an invoice be created for.

4 Q. And in D-56, does Hayat Nur respond to that email later
5 in the day on January 12th of 2022?

6 A. Yes.

7 Q. And what does she include as attachment to her email
8 response?

9 A. Yeah, these are the invoices for that list.

10 Q. And she wrote in the email?

11 A. Yes, "Completed invoices."

12 Q. There's a lot of invoices attached?

13 A. There are.

14 Q. And what's the total value of those invoices that Hayat
15 Nur sent to Abdiaziz Farah on January 12th, 2022?

16 A. I believe when I added them up, it was over \$10 million.

17 Q. Thank you.

18 Now, Ms. Roase, we've talked a lot about the
19 various sites that were opened --

20 A. Yes.

21 Q. -- by the defendants involved in this case. How many
22 total sites were there?

23 A. There were 50 in total.

24 Q. Government Exhibit C-0 is a list of those sites with the
25 addresses of them?

1 A. Yes.

2 Q. Showing you Government Exhibit N-4, is this the sum
3 total of the meals that the defendants claimed to have
4 served at those 50 sites?

5 A. Yes, it is.

6 Q. And the meals for which they claimed reimbursement from
7 MDE?

8 A. Yes.

9 Q. What's the total number of meals for which they claimed
10 reimbursement?

11 A. The total number of meals is 18,835,517.

12 Q. Showing you now Government Exhibit N-5. Is this a chart
13 summarizing the amount of the dollar value of the claims
14 that the defendants submitted for each of these 50 sites?

15 A. Yes, it is.

16 Q. And in the bottom right-hand corner, what's the total
17 amount of Federal Child Nutrition Program funds that the
18 defendants claimed they were entitled to for distributing
19 meals to children at these various -- these 50 sites?

20 A. It's \$49,151,743.16.

21 Q. I want to show you now one final exhibit, Government
22 Exhibit N-3, which is not in evidence.

23 Is Government Exhibit N-3 a chart summarizing the
24 flow of the money from the Minnesota Department of Education
25 to these various entities that we've been discussing in the

1 case?

2 A. Yes.

3 MR. THOMPSON: Your Honor, I'd move to admit
4 Government Exhibit N-3.

5 THE COURT: Any objection?

6 N-3 is admitted.

7 BY MR. THOMPSON:

8 Q. Ms. Roase, can you describe the first page of Government
9 Exhibit N-3?

10 A. Yeah. So it's titled Flow of Money from MDE to Site
11 Recipients. So you can see, basically, if you start on the
12 left side, the Minnesota Department of Education is up top.

13 And on the left it says "Sponsors Requests from
14 MDE," is the \$49,151,743.16. And the actual payout by MDE
15 is on the right side, \$47,920,514.40. There was a stop
16 payment issued in January of '22, which is why there's a
17 discrepancy there.

18 Q. So MDE actually paid out more than -- nearly \$48 million
19 based on these claims by the defendants and their entities?

20 A. Yes.

21 Q. And that money went to the sponsors initially; is that
22 correct?

23 A. That's right. MDE paid the sponsors this \$47.9 million,
24 and the two sponsors are Feeding Our Future and Partners in
25 Quality Care.

1 Q. And it says they got to keep approximately \$5.6 million
2 in administrative fees; is that correct?

3 A. Yes, that's right.

4 Q. What happened to the balance of the money?

5 A. So then the rest of it went out to the sites and/or
6 vendors from the sponsors, and it was a total of
7 \$42.4 million.

8 This is a breakout showing who the direct
9 recipients of the \$42 million was. So you can see the
10 defendants are listed in the top six and shows a total
11 amount paid to defendants directly from the sponsors is over
12 \$36 million.

13 And the related parties on the bottom there,
14 that -- those were the other sites that received the money
15 first before it went to the defendants in this case. So
16 with them it was 6.3 million.

17 Total paid out was 42.4 million.

18 Q. And does page 2 of Government Exhibit N-3 show how that
19 money flowed from those related parties to the defendants
20 and their entities?

21 A. Yes, it does. So this top part here with the
22 defendants, that's the same as the first page.

23 The related parties down here, again, that's the
24 same. However, to the right of that shows the outflow of
25 money that they had received that were paid to the

1 defendants up above.

2 And so of the 6.3 million that these entities
3 received, 4.9 million of it went to the defendants
4 eventually. And so -- so then between this 36 million and
5 this 4.9 million, the total the defendants received was over
6 \$41 million.

7 Q. So \$41 million in Federal Child Nutrition Program funds
8 were paid to ThinkTechAct Foundation, Empire Cuisine &
9 Market, Afrique Hospitality Group, Empire Enterprises, Mind
10 Foundry Learning, or Abdiaziz Farah's personal account?

11 A. And other entities, possibly, or personal accounts or
12 LLCs.

13 Q. Through those related parties?

14 A. Right. Yes, exactly.

15 Q. All based on those 18 million meals that they claimed to
16 have distributed during COVID at those 50 distribution
17 sites?

18 A. Yes.

19 Q. Thank you, Ms. Roase.

20 MR. THOMPSON: No further questions, Your Honor.

21 THE COURT: Mr. Mohring, cross-examination.

22 CROSS-EXAMINATION

23 BY MR. MOHRING:

24 Q. Actually, since we were there, can we start with that
25 last document, N-3?

1 Are you good to go?

2 A. Oh, yes. Sure.

3 Q. Okay. So this is the document that you were just
4 testifying about at the end of your time on direct
5 questioning, right?

6 A. Yes.

7 Q. And this shows -- this is a document -- did you create
8 this?

9 A. Yes, I did.

10 Q. And this shows the flow of money from MDE through the
11 sponsors to defendants and others?

12 A. Yes.

13 Q. You -- we'll talk about this a little more, but you've
14 been here for the whole trial so far?

15 A. Yes.

16 Q. And so you were present for the testimony of all the
17 witnesses who have testified?

18 A. Yes.

19 Q. Starting on whenever it was. Last month sometime?

20 A. Right.

21 Q. And that included the testimony of Ms. Honer, the
22 witness from the Minnesota Department of Education?

23 A. Yes.

24 Q. Do you recall her testimony that MDE has the ability to
25 ask that money be paid back?

1 A. Yes.

2 Q. Did MDE ask for any of this money -- I understand that
3 you guys have seized bank accounts and things like that,
4 right?

5 A. Sure.

6 Q. But has MDE, to your knowledge, tried to get any of this
7 money back from the sponsors?

8 A. I do not know.

9 Q. Do you recall also her testimony acknowledging that the
10 Department of Agriculture has the ability to get money back
11 that the Department of Education wrongly -- or at least has
12 the ability to try to get money back from the Department of
13 Education, because ultimately these are federal funds,
14 right?

15 A. I'm sure -- I'm not sure what the circumstances would be
16 where they would be able to request that money back.

17 Q. I'm not asking that question. Let me start over.

18 The money that we're talking about that -- that
19 you are tracking from the Minnesota Department of Education
20 through the sponsors to the recipients, that's federal
21 funds, right?

22 A. Sure.

23 Q. And federal funds that are made available by the
24 United States Department of Agriculture, as I understand it?

25 A. Yes.

1 Q. Does that sound right?

2 A. Right.

3 Q. To your knowledge, has the Department of Agriculture
4 tried to get any of this money back?

5 A. I do not know.

6 Q. Not to your knowledge?

7 A. I don't know.

8 Q. Looking at the next page, please, page 2, this is a list
9 of the defendants and totals of -- well, entities associated
10 with the defendants and totals of sums that they received
11 from the sponsors?

12 A. Right.

13 Q. USDA funds through the Minnesota Department of Education
14 through the two sponsors, right?

15 A. Right.

16 Q. And it -- under the heading of Defendants, the first is
17 ThinkTechAct Foundation?

18 A. Right.

19 Q. Right? Mahad Ibrahim's entity, one of Mahad Ibrahim's
20 entities?

21 A. Right.

22 Q. Mr. Ibrahim is not a defendant on trial in this trial,
23 correct?

24 A. Not in this one, no.

25 Q. Okay. Okay. Let me take a step back. Remind us again,

1 how long have you been an accountant?

2 A. Been an accountant? I'd say 17 years.

3 Q. Okay. And you've been with the FBI as an accountant for
4 how long?

5 A. For over nine years.

6 Q. And from my understanding -- there's been a lot of talk
7 about the search warrants that were executed with much
8 fanfare on January 20th, '22, right?

9 A. Yep.

10 Q. But your involvement in the investigation began before
11 that, right?

12 A. Yes.

13 Q. Roughly when?

14 A. It was May of '21.

15 Q. Okay. So after -- do you remember from Ms. Honer's
16 testimony that MDE made a referral to the FBI and also to
17 the Department of Agriculture some time in the spring of
18 2021? Maybe April I think was her estimate. Do you
19 remember that?

20 A. Yeah, yep.

21 Q. Did you get involved before or after that?

22 A. I got involved after that.

23 Q. Okay. And your involvement as a -- an accountant, as a
24 financial analyst?

25 A. A forensic accountant.

1 Q. Forensic accountant. Thank you.

2 A. Yes.

3 Q. Following money?

4 A. Yes.

5 Q. Yes? And looking for food?

6 A. Right.

7 Q. Okay. You described your analytical process where you
8 would identify -- that included -- I understand this isn't
9 all that you did, but you'd identify a business entity that
10 was of some concern or interest as a starting point?

11 A. Yeah.

12 Q. Fair? And then you looked at two sources of data. You
13 looked at the Secretary of State records, if there were any,
14 for that entity?

15 A. Right.

16 Q. Right? And then you would also, using the subpoena
17 power that you have available to you, get their bank
18 records, bank records of that entity?

19 A. Yes, that's right.

20 Q. Sometimes multiple accounts?

21 A. Yes.

22 Q. Sometimes only one, if they only had one?

23 A. Right.

24 Q. And those were -- those were steps that you took in the
25 process of developing the evidence that you'd been

1 testifying about for the last day and maybe even
2 three-quarters, right?

3 A. Right, yep.

4 Q. And those were also some of the bases of the information
5 that you worked into the summary charts that we've seen and
6 that you've testified about as well, right?

7 A. Yes, that's right.

8 Q. Okay. In doing those things, getting those -- I guess
9 maybe let's take them one by one.

10 In getting the Secretary of State records, are
11 those -- are those things that you have access to yourself
12 as an FBI forensic accountant?

13 A. I can view them on the Secretary of State website, if
14 it's available; but if I want more information, we have to
15 subpoena those records.

16 Q. Okay. And you -- at least you work -- you, together
17 with other people that you work with, have the ability to
18 get subpoenas and have them issued to -- and served to
19 collect records like the Secretary of State records?

20 A. Yes, that's right.

21 Q. In your analysis of the secretary -- and then you
22 also -- same kind of process for getting bank records,
23 right? The investigation team has the ability to get
24 subpoenas issued, right?

25 A. Right.

1 Q. And have them served?

2 A. Yes.

3 Q. And then -- and through that process collect records
4 from banks and other things too, but that's -- that's the
5 process that you use to get the bank records?

6 A. Right.

7 Q. Mostly in the O series of exhibits, but I think we got
8 into some Gs towards the end there of bank records?

9 A. Yeah, I believe they were Cs.

10 Q. Okay. Cs. Thank you.

11 In doing those things, collecting those records,
12 participating in getting the subpoenas issued and served,
13 were you the only forensic accountant that was working on
14 the material that we've seen presented?

15 A. No, I was not.

16 Q. Part of a team?

17 A. Yes, part of a team.

18 Q. And in the process of analyzing those records once they
19 came in, same question, were you the person that was going
20 through the Secretary of State records and the bank records
21 to build the documents and charts that we've seen?

22 A. I guess I -- if -- I guess I would say mostly it was me.
23 It was just me that started it, before we expanded the scope
24 of the case.

25 And then we had two additional forensic

1 accountants join on later on and throughout the -- yes, and
2 then they would -- they would help out with, you know,
3 looking at the bank accounts, issuing subpoenas.

4 But I guess my role was kind of a lead, and so I
5 would -- I would review their work as well.

6 Q. Okay. So you anticipated my question. So you were kind
7 of supervising them?

8 A. I wouldn't say supervising, but I was kind of -- I have
9 more experience than they do, I guess.

10 Q. Okay. And ultimately there are a number of decisions
11 that were made in the course of going through those records
12 to figure out how to manifest that information in the charts
13 that we've seen, right?

14 A. Sure.

15 Q. Some of the charts -- and we'll get -- we'll get into
16 some examples in a bit, but the chart has a summary chart on
17 the -- as the first page, but then there's a collection of
18 some -- of gathered records underneath it that are the -- at
19 least closer to the raw data from which the summary chart
20 was prepared?

21 A. Yes, that's right.

22 Q. Is that -- I'm not trying to be confusing, but it is a
23 little.

24 A. Yeah, no, I know what you mean. Yeah, we've only shown
25 of the M exhibits just the front page, which is the sources

1 and uses, but behind it is all the underlying data.

2 Q. And all the underlying data is not the raw data, because
3 the raw data is in the O series or the C series bank records
4 themselves, right?

5 A. That's right.

6 Q. So there's a multi-step process. The bank records,
7 C series or O series, are obtained, right?

8 A. Yes.

9 Q. And then those are extracted into a separate document,
10 right?

11 A. Right.

12 Q. Which is then summarized on the first page of the
13 exhibit?

14 A. Yes, that's right.

15 Q. And M-6 would be an example of that. We'll get there,
16 but not quite yet. Would that be an example of --

17 A. Yes.

18 Q. -- what we're talking about?

19 A. That's right.

20 Q. So decisions about -- so you get a bunch of bank
21 records. You extract material from those bank records into
22 the document that is used for this -- or is at least
23 attached to the summary, right?

24 A. Right.

25 Q. But then -- but then that information, those individual

1 entries from the bank register, for example, you make
2 decisions about which of the categories that you make on the
3 summary document individual things go, right?

4 A. Yes.

5 Q. You described at some length the process of deciding
6 whether something was or was not a food expense, right?

7 A. Sure.

8 Q. There was some -- some real estate expenses?

9 A. Sure.

10 Q. So you're making a -- you're looking at a payment to
11 somebody or a deposit from something and deciding what
12 category that most accurately belongs to, right?

13 A. Yes.

14 Q. Is it you that was making those decisions or the other
15 people that were less experienced than you?

16 A. It was me.

17 Q. Okay. At least for all the -- all the exhibits that
18 we've seen?

19 A. Yes, the ones that were gone over, yes, those were my
20 decisions.

21 Q. Okay. Okay. I want to -- let me ask -- so I have a
22 number of questions about those documents.

23 But when I -- when I say "you," is it okay if we
24 have the understanding that I'm not just talking about you
25 as an individual, but you as the representative of this

1 process that collected this information and summarized it?

2 A. Sure, yeah.

3 Q. Okay. Okay. I want to start by limiting the focus of
4 our discussions.

5 We started out yesterday morning with a fair
6 amount of discussion about Safari. Do you recall that?

7 A. Yes.

8 Q. And I think that was presented and described as sort of
9 an entity that initially caught the collective attention
10 of -- attention of federal law enforcement, and off you went
11 to the investigation that has brought us here today.

12 A. Right.

13 Q. Right?

14 A. Sure.

15 Q. Safari is also not on trial here, right?

16 A. They are not.

17 Q. The principals of Safari are not on trial here?

18 A. No.

19 Q. Okay. We talked about Mahad Ibrahim. He is not on
20 trial. I want to ask you some questions about him.

21 After Safari, we went through a considerable
22 amount of testimony specifically about Mahad Ibrahim
23 starting yesterday morning. Do you recall?

24 A. Yeah. I think I was talking about the entities Mind
25 Foundry and ThinkTechAct.

1 Q. Okay. So let's talk about them. Let's start with
2 ThinkTechAct.

3 So we looked at yesterday the Secretary of State
4 filing for ThinkTechAct, right?

5 A. Right.

6 Q. And that identifies Mahad Ibrahim as the person who
7 founded, created that entity?

8 A. Yes.

9 Q. I think back -- do you remember -- actually, can we pull
10 up B-1?

11 I think yesterday we looked at B-1. This is a
12 multi-page document. But do you recognize these as the
13 Secretary of State documents that relate to ThinkTechAct?

14 A. Yes, I believe so.

15 Q. Okay. And so this shows that the opening filing, the
16 original filing that registered this entity in Minnesota
17 with the Secretary of State, was filed in August of 2016?

18 A. Yes.

19 Q. Right?

20 A. Yes.

21 Q. And if we can scroll to page 2. I'm sorry. Page 3.
22 How about 4? There we go.

23 And so this page identifies both the corporate
24 name and the agents, their address -- his address, right?

25 A. Right.

1 Q. And an email address at the bottom for filing notices?

2 A. Yes.

3 Q. Right? All Mahad Ibrahim, right?

4 A. Yes.

5 Q. He and him alone?

6 A. In 2016, yes, this document.

7 Q. Okay. And then if we can go back to the first page.

8 A number of filings happened after that. It looks
9 like there was some -- an involuntary dissolution happened
10 in March of 2018, March 8th, 2018, that was then remedied on
11 March 25th, right, of 2018?

12 A. Yes.

13 Q. And then a series of annual renewals, 2019, 2021, and
14 then later in 2021 -- or I'm sorry. Let me see. '18, '19,
15 '21 annual renewals, right?

16 A. Yes, right.

17 Q. And then an amendment in June of 2021, right?

18 A. Right.

19 Q. I should have said at the beginning, but I represent
20 Mukhtar Shariff.

21 A. Mm-hmm.

22 Q. A name that you've testified about over the course of
23 the last day and a half?

24 A. Yes, right.

25 Q. Mukhtar Shariff does not appear in any of these filings

1 in connection with ThinkTechAct with the Secretary of State
2 filings; is that right?

3 A. Right, he does not.

4 Q. Okay. Not his name, not his address, not his email,
5 right?

6 A. Right.

7 Q. Not as president, not as agent, not as a board member,
8 just not, right?

9 A. Right.

10 Q. And you also -- there was also talk about Mind Foundry
11 and MIB Holdings. Same questions for those. Those are
12 Mahad Ibrahim entities, correct?

13 A. Yes, they are.

14 Q. And at least Mukhtar Shariff does not appear in any way
15 in connection with the Secretary of State filings for either
16 of those -- any of those entities either, right?

17 A. Right.

18 Q. Mind Foundry. The Secretary of State filing links the
19 Mind Foundry name to the ThinkTechAct entity; is that fair?

20 A. Yes, that's right.

21 Q. And then MIB Holdings is a separate creation registered
22 with the Minnesota Secretary of State, right?

23 A. Yes, that's right.

24 Q. So the entity that -- in which there is an overlap
25 between Mukhtar Shariff and Mahad Ibrahim is Afrique

1 Hospitality Group, right?

2 A. Yes.

3 Q. Now, there was some testimony yesterday -- I think the
4 question was even asked -- Mukhtar Shariff owns Afrique
5 Hospitality Group. That is not -- that's not accurate, is
6 it?

7 A. I would say he's the CEO. I would call that an owner.

8 Q. He's the CEO. There's also a CFO, right?

9 A. Right.

10 Q. And that's Mr. Ibrahim?

11 A. Yes.

12 Q. And there's also an organizer.

13 Can we pull up B-8, please?

14 So B-8 is the Afrique Hospitality Group version of
15 the Secretary of State records, same type of records that
16 we've just been looking at, right?

17 A. Yes.

18 Q. And if we can go to page 3, please.

19 Page 3 identifies the company name Afrique
20 Hospitality Group LLC, right?

21 A. Right.

22 Q. Gives the address 1701 American Boulevard East?

23 A. Right.

24 Q. Have you been by there? I mean, that's a real location,
25 right?

1 A. Right, it is. I have not been there.

2 Q. Okay. Do you understand that it's now a functioning
3 event center?

4 A. I do know that.

5 Q. Okay. At that address, right?

6 A. Right.

7 Q. Okay. And then the organizer is Mahad Omar?

8 A. Yes.

9 Q. And the person whose name is typed as signed by is also
10 Mahad Omar?

11 A. Sure.

12 Q. Same mailing address, right?

13 A. Right.

14 Q. But Mukhtar Shariff's email address for official
15 notices?

16 A. Yes.

17 Q. Yes?

18 Can we see O-20, please, page 1?

19 So we've talked about -- you recall this -- O-20.
20 This is the first page of a lengthy collection of materials
21 the bank -- from the Bank of America, right?

22 A. Yes.

23 Q. That relates to the account titled Afrique Hospitality
24 Group LLC?

25 A. Yes.

1 Q. Right? A checking account?

2 A. Right.

3 Q. Can we zoom in in the legal designation, please, the
4 employer identification number? In the -- so I'm kind of
5 color blind, but it looks sort of purple to me. Yeah,
6 great. Thank you.

7 Do you see there's an employer identification
8 number?

9 A. Yes, I do see that.

10 Q. Do you know who obtained that or when?

11 A. I do not know that.

12 Q. Okay. And then -- that's good. And then if we can zoom
13 down on the signatories.

14 So I think you testified before; but at least when
15 this account was opened, there were five people who could
16 sign checks. It's a checking account, right?

17 A. Yes, that's right.

18 Q. Mukhtar Shariff is one of them?

19 A. Right.

20 Q. Mahad Ibrahim is another?

21 A. Right.

22 Q. And three other people also had signatory authority over
23 this account?

24 A. Right.

25 Q. I think you -- so you mentioned that Mahad Ibrahim, I

1 think we -- was the CFO, the chief financial officer, of
2 Afrique Hospitality Group. Is that your understanding?

3 A. Yes, that's my understanding.

4 Q. And have you seen that, I don't know, that title or that
5 role identified on business documents in the course of your
6 investigation?

7 A. I did see somewhere. I can't recall where.

8 Q. Can we see O-238? I'm not sure if this has been
9 admitted actually, so maybe we can --

10 Okay. I think it has been admitted as Government
11 Exhibit O-238.

12 So we looked yesterday, I think, at a number of
13 credit applications. Do you recall?

14 A. Yes.

15 Q. Okay. And so this is a credit application from Sysco, a
16 company that there's been testimony about, right?

17 A. Right.

18 Q. And records we've looked at?

19 A. Yes.

20 Q. Right? And this identifies on page 2, please, the
21 principal owner and principal officers of Afrique as they
22 were applying for an account with Sysco, right?

23 A. Yes, I do see that.

24 Q. Okay. And so Mohamed Omar, the president, right?

25 A. Yes.

1 Q. Mahad Ibrahim, the CFO?

2 A. Yes.

3 Q. And Mukhtar Shariff, the CEO?

4 A. Yes.

5 Q. Can we go back to the first page? I wonder if we can
6 get a date on this.

7 Looks like January 25th, 2021, was the date of
8 this application?

9 A. Right.

10 Q. Does that sound right?

11 A. Yep.

12 Q. Okay. Again, still limiting the focus of our
13 discussions, earlier today we heard a fair bit about Star
14 Distribution?

15 A. Yes.

16 Q. Do you recall?

17 A. Right.

18 Q. And that was an entity through which you followed money,
19 right?

20 A. Right.

21 Q. Looking for food also?

22 A. Yes.

23 Q. Mukhtar Shariff is not in any way associated with Star
24 Distribution as the CEO or CFO or a signatory on any of the
25 bank accounts, right?

1 A. Right, that's right.

2 Q. Okay. Okay. Still on the subject of connections
3 between Mukhtar Shariff and Mahad Ibrahim and Afrique
4 Consulting [sic] Group, I want to ask you some questions
5 about a document that I think we saw earlier today has been
6 admitted as a Government Exhibit G-110.

7 So this is a multi-page document, right,
8 Ms. Roase?

9 A. Yes, that's right.

10 Q. And it begins with -- it is an email from Mahad Ibrahim
11 to Mukhtar Shariff, right?

12 A. Yes, I see that.

13 Q. Sent on December 31st, 2020?

14 A. Right.

15 Q. With a subject, Pitch link?

16 A. Yes.

17 Q. In which Mr. Ibrahim, or at least someone sending from
18 his account, said, "Need to add financials but ran out of
19 energy tonight." Do you see that?

20 A. Right, yes.

21 Q. And this is an email that was obtained from Google in
22 response to a search warrant, as I understand it, right?

23 A. I believe that's right.

24 Q. And a search warrant for either one or the other of
25 these email addresses, maybe both?

1 A. Right, yep.

2 Q. Okay. And then there's a link to a Google Doc or a
3 Google page, google.com page, right?

4 A. Yes.

5 Q. And then it has Mahad Ibrahim and a phone number, right?

6 A. Right.

7 Q. Okay. So this is -- this is a document that was set
8 from -- sent from Mahad Ibrahim to Mukhtar Shariff on
9 December 31st, 2020, right?

10 A. Right.

11 Q. New Year's Eve?

12 A. Yes.

13 Q. Yeah. Okay. It was -- let me ask you about a couple
14 other exhibits.

15 So -- well, actually, let's go to the next page,
16 please.

17 So the first page of this, what is described as a
18 pitch, there's a colorful logo, if you would accept that
19 characterization. Afrique?

20 A. Sure, yep.

21 Q. Right? And says, "Where Minnesota Meets Africa,
22 Restaurant, Event Space, Catering, Food Service, Delivery
23 and Take Out." Right?

24 A. Yes.

25 Q. And then what follows are a number of pages, some of

1 which you were testifying about I think earlier today,
2 describing this thing Afrique, right?

3 A. Right.

4 Q. I want to ask you about some earlier correspondence,
5 similar correspondence.

6 And so let's start with what has been marked as
7 D7-199, just for the witness, please.

8 This is an exhibit. And I think by stipulation,
9 by agreement, this can be admitted?

10 MR. THOMPSON: Yes. No objection, Your Honor.

11 MR. MOHRING: Okay. Then --

12 THE COURT: D7-199 is admitted.

13 BY MR. MOHRING:

14 Q. Okay. So if we could publish it to the jury, that would
15 be great.

16 So we're looking at an email from Mahad Ibrahim,
17 right?

18 A. Yes.

19 Q. Same email address, right?

20 A. I believe so, yes.

21 Q. And it's -- although the email was sent to somebody on
22 July 21st of 2020. Do you see that?

23 A. Yes, I do.

24 Q. But it's forwarding an image, forwarding an email from
25 November 26, 2018, right?

1 A. I see that.

2 Q. And that email that was being forwarded was also sent
3 from Mahad Ibrahim, right?

4 A. Yes.

5 Q. Mukhtar Shariff nowhere in any of this email chain,
6 right --

7 A. Right.

8 Q. -- that we're looking at?

9 A. No.

10 Q. Can we go to page 2?

11 So the images that were forwarded in 2020, but
12 initially sent in 2018, same logo, right?

13 A. Yes.

14 Q. Do you see in the upper right Afrique?

15 A. Yeah, upper left. Yes.

16 Q. I'm sorry, yes. I have that problem.

17 And the upper right there's a tree? Do you see
18 that?

19 A. Right. Yes.

20 Q. Do you recall seeing that image in the pitch deck?

21 A. I do.

22 Q. Okay. So these images existed as early as --

23 Can we go to the first page again, please, Kate?

24 Thank you.

25 As early as 2018, right?

1 A. Yeah, it appears so.

2 Q. Okay. Let's go back to G-110, please.

3 Okay. So this is the -- this is the government
4 exhibit that has the pitch link, the subject matter in the
5 email, right?

6 A. Yes.

7 Q. And on page 4, this is -- actually, can we scroll
8 through from 1 to 4, just to see how -- where we are?

9 So page 1. Same -- same logo as from 2018, right?

10 A. Right.

11 Q. Page 2. There's a Mission Statement. Promote African
12 culture, community and economic empowerment, right?

13 A. Yep.

14 Q. Through innovative cuisine and experiences, right?

15 A. Yes, yes.

16 Q. Page 3. There's a revenue model, right?

17 A. Yes.

18 Q. And this is one of the things that was focused on.
19 Hedge risk and volatility of hospitality business with
20 large, consistent revenues from food service contracts. And
21 then there's reference to the two federal food programs,
22 right?

23 A. Yes, that's right.

24 Q. Their acronyms?

25 A. Yes.

1 Q. Now, at the -- this was sent in -- on New Year's Eve
2 2021, right?

3 A. Yeah. 2020.

4 Q. 2020?

5 A. Right.

6 Q. COVID we had been dealing with for the better part of
7 nine months or so at that point, right?

8 A. Right, yes.

9 Q. This is right at the point in time when vaccines were
10 becoming at least developed and ultimately available, right?

11 A. Yes.

12 Q. I looked and, according to the FDA site, vaccines first
13 became available, COVID vaccines, on December 11th, 2020.

14 Does that sound about right?

15 A. Probably, yeah. Yeah.

16 Q. Ish?

17 A. Yeah. Yes.

18 Q. Okay. So -- so at the time that this was -- that this
19 pitch, not the earlier one, but that this pitch was sent
20 from Mahad Ibrahim to Mukhtar Shariff, vaccines were being
21 discussed, right?

22 A. Yes, I think so.

23 Q. Okay. It would make sense then that a revenue model
24 looking to work with federal food programs would consider
25 that the circumstances around the disease and the disease in

1 the United States population were changing, right?

2 A. I -- there's -- I mean, what I don't agree with is where
3 it says "consistent revenues from food service contracts"
4 that are Federal Child Nutrition Program funds. That's what
5 I don't agree with.

6 Q. Okay. In any event, we do agree, though, that this
7 document was circulated, sent to Mukhtar Shariff, at a time
8 when vaccines and the phenomenon of vaccines were very much
9 being discussed and known?

10 A. Yes.

11 Q. I remember the rollout. I mean, different people got
12 access at different times. But at least the reality of
13 vaccines was known at the point in time that this pitch was
14 sent from -- by Mr. Ibrahim to Mr. Shariff.

15 A. Sure.

16 Q. Fair? Okay.

17 Can we go to page 10, I think? So I think this is
18 the last page, is it? Not quite.

19 Okay. Page 10 identifies the team, right?

20 A. Yes.

21 Q. Mukhtar Shariff is one of the names here?

22 A. Yes.

23 Q. Mohamed Omar, the person who registered -- or the name
24 that registered Afrique Hospitality Group; is that right?

25 A. Actually, I think it was different. It's Mahad Omar I

1 believe is who it was.

2 Q. I apologize.

3 A. Similar name.

4 Q. Okay. And also Mahad Ibrahim, right?

5 A. Yes.

6 Q. Mukhtar Shariff, his last name is misspelled in this
7 document, right?

8 A. It appears so.

9 Q. Okay. Page -- can we go to page 9.

10 So page 9 also talks about -- makes reference to
11 the acronyms of the two food programs?

12 A. Yes.

13 Q. Right? It talks about 2500 kids daily of food service
14 contracts?

15 A. Right.

16 Q. Right? "Contracts," the word, is used. Yes?

17 A. Yes.

18 Q. And some of this you were asked about on direct
19 examination. "Federal program with regular reimbursement."
20 Right?

21 A. Right.

22 Q. There's talk about the -- some costs that are inclusive
23 of a profit margin, right?

24 A. Sure.

25 Q. Consistent revenues, right?

1 A. Right.

2 Q. But the last point I don't think was highlighted when
3 the prosecution zoomed in, and it says "Presence of high end
4 commercial kitchen makes catering delivery easy and
5 efficient." Right?

6 A. Yes.

7 Q. And that's on a page that is talking about the federal
8 food programs, right?

9 A. Right.

10 Q. So in this document, a high-end commercial kitchen and
11 catering is discussed on the same page in connection with
12 the federal food programs, right?

13 A. Yes, it is.

14 Q. As a part of the anticipated activity of this entity,
15 right?

16 A. Where I would disagree with is they did not -- there was
17 not any high-end commercial kitchen yet at the time.

18 Q. Well, there wasn't anything yet, right?

19 A. Exactly; there wasn't anything.

20 Q. So this is all a part of a projection, a plan for
21 something not yet in existence, right?

22 A. Sure, right.

23 Q. And so one of the things that they planned for this
24 thing that they hoped to create and ultimately did, right?

25 A. They did with food nutrition program money.

1 Q. Okay. They did, right? So this thing that they created
2 that this is -- that this is a pitch for, included the
3 creation of a high-end commercial kitchen, right?

4 A. It should have been funded by something other than food
5 nutrition program.

6 Q. I'm not asking -- we can talk about the funding, if you
7 want. All I'm asking -- what I'm asking you about right now
8 is this plan connected a high-end commercial kitchen to the
9 projection, the objective of working with the food programs.
10 Yes?

11 A. That is what it says there, yes.

12 Q. Okay. In doing so to make catering delivery easy and
13 efficient, right?

14 A. Sure, right.

15 Q. In connection with the food program, right?

16 A. Sure, yes.

17 Q. So not bags of groceries. Catering and a high-end
18 commercial kitchen. Right?

19 A. However, I don't think it was catering at all.

20 Q. Let's start with the answer. Right? That's what the
21 document says, right?

22 A. That's what this page says.

23 Q. Okay. Can we go to page 12, please.

24 So page 12, further down on the document, do you
25 recall seeing this as you reviewed the pitch?

1 A. Yes.

2 Q. Identifies some key assumptions, right?

3 A. Yes.

4 Q. And at the bottom there's a statement that says, "Food
5 service revenue not included in profit and loss
6 projections." Do you see that?

7 A. Yes, I see that.

8 Q. Okay. Okay. Since we are there, let's -- can we go
9 back to the Afrique bank account, which I think is 0-20?

10 Okay. We looked at the opening page. There are
11 five signatories.

12 Can we scroll down, please. Keep going. Keep
13 going. And again.

14 Okay. So I think we're on page -- is this 5? Of
15 the document. I think this is where we first start to get
16 to the actual account information about deposits and
17 withdrawals and stuff like that, right?

18 A. Yes, that's right.

19 Q. Okay. And so the first statement is for -- it looks
20 like February, right?

21 A. It's from January 7th, 2021, to January 31st, 2021.

22 Q. Thank you. And so this shows an opening balance of
23 zero, as one would expect, right?

24 A. Right.

25 Q. And that in January, sometime between January 7th and

1 January 31st, just over \$400,000 were deposited into the
2 account?

3 A. Yes, that's right.

4 Q. Right? And no withdrawals, right?

5 A. Right.

6 Q. Can we go to the next page? And the next. And the
7 next. One more. Can we go back one? I wonder -- okay.

8 You know, let's come back to this. I want to look
9 at M-6, which is a summary of the records.

10 Okay. Just a few more questions about -- actually
11 about Mr. Ibrahim, Mahad Ibrahim.

12 When you were -- when you were testifying about
13 ThinkTechAct and Mahad Ibrahim yesterday, we saw two lists
14 in emails. Let's start with D-16, please.

15 Okay. D-16 is an email sent on April 4th of 2021,
16 right?

17 A. Yes, that's right.

18 Q. I don't believe that Mukhtar Shariff is anywhere in the
19 email chain, right?

20 A. No.

21 Q. And then there are several -- I think several pages
22 of -- I think we've been calling these links to Google
23 documents, right?

24 A. Right, yes.

25 Q. In a message that was forwarded on April 4th, right?

1 A. Right.

2 Q. That had been sent on, initially, on March 31st?

3 A. Yes.

4 Q. Can we go to page 2 and 3 and 4?

5 A bunch of files that contain names that we're
6 familiar with as sites, right?

7 A. Yes, that's right.

8 Q. Do you have any information that Mukhtar Shariff
9 participated in the submission of claims for any of these
10 sites?

11 A. For these ones, I don't know.

12 Q. Okay. Can we look at D-7? I'm sorry. D-27.

13 Same -- same type of email, different day, I
14 think, May 31st, 2021, right?

15 A. Yes, right, yes.

16 Q. That -- again, a long list of sites.

17 Can we see the next page? Okay.

18 Same question. Do you have any -- are you aware
19 of any evidence that Mukhtar Shariff submitted claims or
20 participated in the submission of claims for any of these
21 sites?

22 A. I do not.

23 Q. And both of these emails involve Partners in Quality
24 Care, Partners in Nutrition, same entity, right?

25 A. Right.

1 Q. Not Feeding Our Future, correct?

2 A. That's right.

3 Q. And Dar Al-Farooq, the site that we've talked about and
4 that you've testified about in connection with Mukhtar
5 Shariff, that was a Feeding Our Future site, right?

6 A. Yes, that was a Feeding Our Future site.

7 Q. For the whole -- for the time period that we're talking
8 about, the time period of your investigation, right?

9 A. Yes, that's right.

10 Q. Okay. And although there were invoices, and we'll get
11 to this in a bit, that, as I understand it, as we understand
12 it, were submitted to both Partners in Nutrition and Feeding
13 Our Future?

14 A. Yes.

15 Q. Right?

16 A. Right.

17 Q. But in terms of actual claims for sites, the same site,
18 are you aware of any instance where the same site -- claims
19 were submitted about the same site to the two -- let me see
20 if I can ask that question a little more coherently. Same
21 site, submitted to both sponsors. Did that ever happen?

22 A. I don't believe so.

23 Q. At least for the same time period, right?

24 A. Right, yeah, no.

25 Q. And the system's set up so that an application is made

1 and the Minnesota Department of Education approves the site
2 for a particular sponsor, right?

3 A. Sure, right.

4 Q. And Feeding Our Future and Partners in Nutrition are
5 different sponsors, right?

6 A. They are.

7 Q. That were sponsors of different sites?

8 A. Yes, that's right.

9 Q. Okay. Maybe never believe a lawyer when they say "the
10 last question," but maybe the last question about
11 ThinkTechAct.

12 When Ms. Honer was testifying at the very
13 beginning of the testimony in the case, one of the things
14 that she identified in one of the sort of, kind of
15 hierarchical descriptions of the entities that money flowed
16 through was a situation where -- so MDE sends the money to
17 sponsors, sponsors send the money to vendors, right?

18 A. Yes, to -- the sponsors send the money to the vendors or
19 the nonprofit.

20 Q. Right.

21 A. Right.

22 Q. And so the nonprofit, she said that sometimes -- it's
23 not required, but sometimes there's a nonprofit that exists
24 as an intermediary or at least in the space in between
25 vendors and sponsors, right?

1 A. Yes. I think my understanding is with the CACFP
2 program, that money goes to -- it needs to be operated by a
3 nonprofit. So then the money from the sponsor would go to
4 the nonprofit. But if it's the Summer Food Service Program,
5 that contract with a vendor is with the sponsor. So then
6 the sponsor would be paying the vendor for those meals.

7 Q. So in some instances the sponsor pays the vendors
8 directly?

9 A. Right.

10 Q. Fair? In other instances there's an intermediary, a
11 nonprofit intermediary between the sponsor and the vendor?

12 A. Yes, that's right.

13 Q. And TTA was -- ThinkTechAct was an intermediary for a
14 number of sites?

15 A. Yes, they were.

16 Q. Okay. We looked at a bunch of claim forms, and I want
17 to look at a few as an example. But can we see page C-346,
18 page 1?

19 So C-346 is an email that's in evidence. I think
20 actually there's several -- several exhibits, same email.
21 But do you see at the top there's a line From?

22 A. Yes.

23 Q. And it says Mukhtar Shariff?

24 A. Yes.

25 Q. Mukhtar is spelled M-U-K-H-T-A-R, right?

1 A. Yes.

2 Q. And we looked at a number of claim forms. And you
3 recall the claim forms at the top, but also at the bottom,
4 there's a line for the meal claim forms, it says site
5 supervisor?

6 A. Yes.

7 Q. And we've seen a bunch of different names in that field?

8 A. Right.

9 Q. Can we see -- let's see. What are we in? Yeah, C-346.
10 Can we go to page 2?

11 So there's a name at the bottom, signature of site
12 supervisor. Do you see that?

13 A. Yes, I do.

14 Q. Handwritten in this instance?

15 A. Right.

16 Q. Week of 9-1/9-3. There's not a year, but I'm assuming
17 we're talking about 2021?

18 A. Yes, that's right.

19 Q. Has a sponsor name handwritten as FOF, and the site as
20 Dar Al-Farooq, right?

21 A. Right.

22 Q. Can we see the next page, please?

23 So page 3 there's -- this is a site delivery
24 receipt. Same time frame that we're talking about, 9-1/9-3?

25 A. Right, yes.

1 Q. There's a Kitchen Supervisor/Staff for the Shipped by --
2 scribbled by the Shipped by field. Do you see that?

3 A. Right, yes.

4 Q. And also a site supervisor/staff?

5 A. Yes.

6 Q. Okay. Can we go to the next page?

7 Same forms, different date, handwritten signature,
8 right?

9 A. Right.

10 Q. And can we go to page 6? Are we there?

11 So, again, same forms, different time range,
12 handwritten signature by the site supervisor?

13 A. Right.

14 Q. Okay. Can we now see D-35, please?

15 Okay. D-35 is an email, September 15th, 2021,
16 right?

17 A. Yes, that's right.

18 Q. Can we go to page 3?

19 Okay. Same type of form, right?

20 A. Yes.

21 Q. Now, we're talking about 8-1/8-7 and 8-8/8-14. I'm
22 assuming 2021, right?

23 A. Right.

24 Q. And there's a more legible, printed, but still
25 handwritten name at the site supervisor on each of these

1 forms?

2 A. Right.

3 Q. M-U-K-T-A-R, right?

4 A. Yes.

5 Q. Misspelled?

6 A. It is misspelled, yes.

7 Q. Do you recall Mr. Hadith Ahmed's testimony? He was
8 asked some questions about these forms, right?

9 A. Right.

10 Q. These types of forms?

11 A. Yes.

12 Q. Maybe not these specific ones.

13 A. Right.

14 Q. Right? And you recall he acknowledged forging people's
15 names at that field, right?

16 A. Yes.

17 Q. Okay. There's been a lot of testimony about the numbers
18 among -- numbers of claims generally, but also the numbers
19 as reflected in those meal claim forms, the types that we
20 were just looking at, right?

21 A. Mm-hmm, right.

22 Q. So I want to ask you some questions about those. Let me
23 ask first about C-345.

24 So C-345 is an email sent on Wednesday,
25 October 20th, 2021, with some -- both attendance and roster

1 attachments, right?

2 A. Yes.

3 Q. Okay. And then -- and that was sent to Mr. Shariff or
4 at least to Mr. Shariff's email, right?

5 A. Yes.

6 Q. And can we see 346, please.

7 Okay. Thursday, October 21st. So is that the
8 next day, right?

9 A. Right.

10 Q. We can toggle back. But so the next day, same documents
11 sent on to claims@FeedingOurFuture?

12 A. Sure, yes.

13 Q. Okay. And among the attachments were meal attendance
14 forms, meal claim forms, the likes of which we were just
15 looking at, right?

16 A. Yeah, I believe so.

17 Q. Okay. Okay. You, or at least you and the group that
18 you were working with, prepared some summary documents. I
19 think we're talking about N-24 and N-25, or is it N-4 and 5?

20 Can we look at N-4?

21 Okay. This is -- this is one of the summary
22 documents that you participated in preparing, right?

23 A. Yes, that's right.

24 Q. And this is a summary of meals claimed by the various
25 sites that you believe are involved in this case, right?

1 A. That's right.

2 Q. Okay. And then -- and meals claimed by site and by
3 month, right?

4 A. Right.

5 Q. And then N-5 is the same data, but now the -- the amount
6 of money claimed in connection with those meals, same sites,
7 same months, right?

8 A. Right.

9 Q. Can we go to N-5?

10 So these are totals by site by month, right?

11 A. Yes.

12 Q. Okay. Let's go back to an individual claim. And why
13 don't we go back to D-35, page 3, please.

14 So D-35, page 3, we've got numbers for August,
15 8-1/8-7 and 8-8/8-14, right?

16 A. Yes.

17 Q. And these are claims, consolidated meal counts for the
18 Dar Al-Farooq site, sponsored by Feeding Our Future, right?

19 A. Right, yep.

20 Q. And for the 8-1/8-7, 1,960 meals are being claimed each
21 day for a total of 15,260 for that week, right?

22 A. Right, yep.

23 Q. 1,960. A bigger number for Saturday, right?

24 A. Right, yep.

25 Q. Okay. So you recall from the testimony, and I'm not

1 going to go through all of the waivers or even many of them,
2 but in the -- during the time period that we're talking
3 about, the time period that these food programs were being
4 administered under the shadow of COVID and the pandemic, the
5 program -- a number of the program operating requirements
6 were suspended or modified, right?

7 A. Right.

8 Q. We talked about waivers.

9 A. Right.

10 Q. And some of the waivers -- some of the 113 waivers, some
11 odd waivers, were extensions of previous waivers and some of
12 them were new waivers. But there were a number of waivers
13 that changed the way that the program could operate, right?

14 A. Yes, that's right.

15 Q. And these were -- these were changes that were -- that
16 were allowed by the Department of Agriculture, right?

17 A. Yes.

18 Q. But often at the request of the Minnesota Department of
19 Education or other entities like them around the country,
20 right?

21 A. Yes.

22 Q. And among the changes that happened were to allow open
23 sites? Do you recall that from the testimony?

24 A. I mean possibly. I don't recall specifically.

25 Q. I'm not trying to throw out a bunch of buzz words. But

1 that -- there was a waiver that happened that allowed for --
2 for some sites, at least -- there wasn't a geographic
3 requirement, right? There wasn't an area eligibility
4 requirement? Do you remember some of that testimony?

5 A. Yeah, I think there was something like that, yeah.

6 Q. Okay. So sites were open to allowing people from larger
7 communities to come and receive food there. That was one of
8 the modifications that happened.

9 A. Sure, yep.

10 Q. Another of the modifications allowed for more than one
11 meal to be distributed at a particular time, right?

12 A. Yes.

13 Q. And also for more than one person -- for meals for more
14 than one person to be received by a person at one time?

15 A. Right.

16 Q. And for more than one day to be received and given at
17 one time?

18 A. Yes.

19 Q. Right?

20 A. Right.

21 Q. So the claim for a number of meals on Sunday in that
22 context -- well, let's talk about it this way. The total
23 number of meals that we're looking at in this 15,260 for
24 this particular example, that is -- that is the total number
25 of meals that were claimed to have been given on that -- for

1 that time period, that week, right?

2 A. Right, for that week.

3 Q. Broken down as 1,960 per day, except for Saturday, which
4 was a bigger number, right?

5 A. Right. Yes.

6 Q. I'm not going to spend a lot of time with CLiCS forms, I
7 think, but I do have some questions about some.

8 So can we go to C-100, please?

9 So C-100 is in evidence, and this is a CLiCS form.
10 You recall looking at these types of records?

11 A. Yes.

12 Q. Okay. And this is one for Feeding Our Future, the
13 Dar Al-Farooq site, right?

14 A. Right, yes.

15 Q. And this is for the Summer Food Service Program, this
16 particular CLiCS form, right?

17 A. Right, yes.

18 Q. And if we go to the next page, more discussion about the
19 time frame of the CLiCS approval, right?

20 And then the next page, please.

21 And so what this -- what this form shows on page 3
22 is that the Dar Al-Farooq site was approved for 4,000
23 estimated children served breakfast and lunch for the Summer
24 Food Program, right?

25 A. Yes.

1 Q. And can we go to the first page, please? And right at
2 the top Site, this CLiCS form shows that that site and that
3 number were approved by the Minnesota Department of
4 Education, right?

5 A. Yes.

6 Q. 4,000. A number above the numbers that we just looked
7 at in connection with those meal claims forms, right?

8 A. That is the maximum. 4,000 is the maximum allowed.

9 Q. A larger number than was claimed. Yes?

10 Let me ask the question this way. This document
11 reflects that the Minnesota Department of Education approved
12 the Dar Al-Farooq site for a maximum, for the Summer Food
13 Service Program, for a maximum of 4,000 meals, breakfast and
14 lunch, right?

15 A. Yes, that is the approved amount.

16 Q. Okay. And the claim forms that we looked at reflected
17 lower numbers than that, right?

18 A. They were lower, but it doesn't mean that that's what
19 was actually provided.

20 Q. And -- and I'll ask that question in a minute, but let's
21 look at --

22 Can we now look at C-93, please?

23 Okay. C-93. Similar document, but different
24 program, right? This is for the Child and Adult Care Food
25 Program, right?

1 A. Right, yes.

2 Q. But same type of document. The CLiCS form that shows
3 the approval of the Dar Al-Farooq site, right?

4 A. Right.

5 Q. And -- I forget which page. Can we go down to the next
6 page?

7 This reflects, because this is the way that this
8 site -- that this form is written, an estimated daily
9 enrollment of 6,000, right?

10 A. Right.

11 Q. Again, a number significantly higher than any of the
12 daily claims that were made that we've looked at for the
13 Feeding Our Future site, yes?

14 A. 6,000 is the max.

15 Q. 6,000 is the max. And that is a larger number than 1950
16 or any of the other numbers that we saw on any of the claim
17 forms?

18 A. It doesn't matter.

19 Q. Correct? I'm not asking --

20 A. It doesn't matter.

21 Q. Ma'am, I'm not asking your opinion about whether it
22 matters. I'm asking about what the documents in CLiCS
23 showed.

24 A. The approved amount is 6,000.

25 Q. And that is substantially above any of the claims,

1 right? It is a larger number than any of the claims, yes?

2 A. No, I would say. I mean, I still feel like the claims
3 were -- they were too high. They were significantly high.

4 Q. It would be deeply troubling if you felt otherwise,
5 wouldn't it?

6 A. I don't know what you mean.

7 Q. The meal claim forms -- are you aware of any of the meal
8 claim forms submitted in connection with the Dar Al-Farooq
9 site, signed by whichever site supervisor or forged by
10 whichever name, that presented and made a claim for a number
11 of meals, daily meals, that was greater than 6,000?

12 A. Not for 6,000 for this site.

13 Q. Okay. Okay. I want to ask you some questions about
14 some of your testimony comparing the amount of money that
15 was -- that you identified as being spent on food versus the
16 money of -- amount of money that was being claimed for
17 reimbursement. Do you recall testimony along those lines?

18 A. Yes.

19 Q. I think -- I mean, I'm not trying to misstate your
20 testimony. But one of the reasons that you looked for --
21 for food or evidence of food purchases was to see how
22 much -- the amount of money that was being -- the amount of
23 food that was being purchased to see how that would compare
24 to the amount of money that was being claimed for
25 reimbursement.

1 A. Yes, that's right.

2 Q. Is that fair?

3 A. Yes.

4 Q. So is one of the reference points in making that
5 assessment the reimbursement amounts -- I think we saw unit
6 cost on a lot of the invoices, right?

7 A. Sure, right.

8 Q. And do you recall not in the CLiCS data, but in some of
9 the vendor contracts, there's also sums of money that are
10 specified for -- for per meal, depending on the meal? Do
11 you remember that?

12 A. Yes.

13 Q. And, I mean, we saw numbers like \$4.05, 3.91.

14 A. Right.

15 Q. Anyway, there's a number that is identified in a number
16 of places as the reimbursement amount that would be attached
17 to -- to a meal, depending on the type of meal?

18 A. Yes, I saw that.

19 Q. Breakfast different than lunch, lunch different than
20 snack, snack different than supper, right?

21 A. Right. Yes.

22 Q. But specific amounts for each of those types of meals,
23 right?

24 A. Yes, they were specific amounts.

25 Q. And those sums did not -- they changed some over the

1 time frame of food program activity during COVID, right?

2 A. Yes.

3 Q. Did they grow?

4 A. It did go up.

5 Q. Okay. So one of the reference points in assessing "did
6 they buy enough food for the amount of money that's coming
7 in" is the amount of money that's coming in, which is
8 attached to that dollar amount per meal, right?

9 A. Sure.

10 Q. The other is the amount of food that's being bought,
11 right?

12 A. Yes.

13 Q. Are you aware from your involvement in the investigation
14 about -- information about the amount of profit, for lack of
15 a -- to use a word, the gap between the cost of food for a
16 particular meal and the reimbursement amount for that meal?

17 A. I don't know the specifics for what the actual would be.
18 However, what I saw was 10 percent of the money received was
19 actually spent on food.

20 Q. Okay. I'm asking a different question.

21 I'm asking if you're familiar with the
22 investigation and the identification of information about
23 how much the food for a particular type of meal would cost
24 compared to the reimbursement amount?

25 A. I don't know the specifics.

1 Q. Do you recall information that would suggest that the
2 gap, that is, the difference between the cost of food and
3 the reimbursement amount, could be as much as double or
4 more?

5 A. No way.

6 Q. Is that -- is that a calculation that you investigated?

7 A. I didn't have to investigate a calculation like that.

8 Q. So the answer is no, you did not make a calculation of
9 the amount -- the cost of the food that would be required to
10 meet the requirements of a meal for reimbursement?

11 A. What we did was we looked at the actual rate of each
12 item and compared it to the reimbursable rate.

13 Q. You lost me on the first part. The rate of each item?

14 A. Yes. So we went through the Sysco invoices, the Upper
15 Lakes Foods invoices. We calculated the rate per meal based
16 on what those items were and compared it to what the -- what
17 the reimbursement was supposed to be.

18 Q. Okay. So -- so I think we're communicating.

19 So the rate per meal. You made a calculation of
20 how much food for a particular meal would cost, did you?

21 A. I mean, yes, but I wouldn't say it was double. I
22 wouldn't say that the cost of the food was less than half of
23 what the reimbursement rate was.

24 Q. Are you aware from your involvement in the investigation
25 of evidence that would suggest that it was actually double

1 or more?

2 A. No.

3 Q. Okay. I want to ask you some questions about some of
4 the summary charts as they relate to Mukhtar Shariff.

5 A summary chart that you prepared, one of them is
6 M-6, right?

7 A. Yes.

8 Q. And this is -- this is a summary chart. You said some
9 of -- some of the summary charts that you prepared, you
10 actually drew from financial information from more than one
11 account, right?

12 A. Right.

13 Q. This is one that came from one account?

14 A. This is one account.

15 Q. Okay. And that's a Bank of America account for Afrique
16 Hospitality Group, right?

17 A. That's right.

18 Q. And that's the one that we were looking at the opening
19 documents, O-20, initially at least five signatories on the
20 account?

21 A. Right.

22 Q. Okay. And in this document you calculated a food
23 expense of \$980,000, right?

24 A. That's right.

25 Q. And that's going through the -- well, that's you're

1 reviewing the purchases, the spending out of this account
2 and deciding which of them appeared to you to be money that
3 was spent on actual food, right?

4 A. Yes.

5 Q. And Sysco was, you said, I think, was the main -- main
6 entity that -- that that \$980,000 came from or went to?

7 A. Yes. Yep, that's right.

8 Q. Okay. Can we see, just for the witness, I think not
9 admitted, M-6b.

10 M-6b is a breakout of food paid by that account,
11 right? Food -- money spent on food from that account?

12 A. Out of that account, yes.

13 Q. And is that -- is that a summary exhibit that you
14 prepared also?

15 A. Yes, it is.

16 Q. Is this a type of, kind of, dialing in underneath a
17 larger summary to a subset of the information in that?

18 A. Yes, it is. However, this includes, I want to say, one
19 extra month. So the amount does not match exactly to M-6.

20 Q. Okay.

21 MR. MOHRING: Can we -- I'd move to admit
22 Government Exhibit M-6b.

23 MR. THOMPSON: No objection.

24 THE COURT: M-6b is admitted.

25 MR. MOHRING: And can we publish, please?

1 BY MR. MOHRING:

2 Q. So M-6b shows a sum of withdrawal for Sysco. These
3 are -- these are payments out of the same account, M-6 and
4 M-6b, right?

5 A. Yes, it is.

6 Q. Okay. And M-6b shows payments to Sysco of \$982,000,
7 very close to the number in M-6, right?

8 A. Yes, but, again, however, this is different than M-6,
9 because M-6 stops in June of '22.

10 This schedule goes out an extra month, and the
11 difference is there's an extra Sysco payment of \$70,000 in
12 July of '22, which is well past the period of the food
13 nutrition program. So that really should not be in --
14 considered as part of the food nutrition program.

15 Q. So you prepared this, but you think it shouldn't be
16 considered?

17 A. Oh, it definitely shouldn't.

18 Q. Okay. Let's go back to M-6 then. So M-6, \$980,000 to
19 Sysco, right? \$980,000 to food mostly to Sysco?

20 A. Right. That's right.

21 Q. Okay. And then in the following pages in M-6 are
22 extractions from the bank account of all the transactions
23 that are then factored into the conclusions that appear on
24 the first page, right?

25 A. Right.

1 Q. So this is -- this is a version of the bank account
2 statement kind of stepping between the actual bank account
3 statements and the summary chart on page 1, right?

4 A. Yes, that's right.

5 Q. And so depending on the item, you looked at that and
6 decided which of the categories in M-6 on the first page
7 that particular item would go to, right?

8 A. Yes, that's right.

9 Q. Can we go to the first page -- second page, please? I'm
10 sorry. Page -- yeah, there we go.

11 So just looking at the first handful of entries.

12 That would be great. Thank you.

13 Okay. So this is -- these are -- these are a
14 presentation of information that you got from the bank
15 account records themselves, right?

16 A. Yes, that's right.

17 Q. A date? Yes?

18 A. Yes.

19 Q. A description?

20 A. Yes.

21 Q. Right? The payor?

22 A. Yes.

23 Q. If there's a check, that number?

24 A. Right.

25 Q. If there's anything written in the memo, you include

1 that?

2 A. Yes.

3 Q. Depending on what it was, deposit or withdrawal, the sum
4 appears there, right?

5 A. Right.

6 Q. And then the balance and some notes?

7 A. Right, yes.

8 Q. Right?

9 A. Yes.

10 Q. Nowhere in this -- none of these reflects a box on the
11 first page into which those particular things were put,
12 right?

13 A. It is a hidden column. So yes, it's not on here.

14 Q. A hidden column?

15 A. Well, yeah, because it's an Excel spreadsheet.

16 Q. Okay. Okay. The zone that we're looking at reflects
17 the first month and change of activity in this account,
18 right?

19 A. Right.

20 Q. And so this shows that -- at least the first activity in
21 the account shows a deposit of \$100 on January 7th, 2021?

22 A. Right.

23 Q. Right?

24 A. That's right.

25 Q. There are then deposits. \$140,000 from Compassion Adult

1 Day Services LLC?

2 A. Right.

3 Q. Not a site?

4 A. That is investment money.

5 Q. Okay. Not a site, right?

6 A. I don't know.

7 Q. And then deposits with payor, three different people's
8 names, right?

9 A. Right.

10 Q. Raaho Adan, \$50,000?

11 A. Yes.

12 Q. Sulekha Hassan?

13 A. Yes.

14 Q. \$210,000?

15 A. Right.

16 Q. Khalid Omar, \$14,000, right?

17 A. Yes, right.

18 Q. And then a deposit from a Bank of America account,
19 \$210,000 on February 4th, right?

20 A. Right.

21 Q. Did any of that initial \$500,000 or so of deposits come
22 from food program money, to your knowledge?

23 A. No, those were -- I want to say that those were all
24 investment money.

25 Q. Okay. So the opening -- the first five -- and, well,

1 let's see, there's a withdrawal on February 4th, right, for
2 rent? Right?

3 A. Right.

4 Q. \$38,000, first month rent and deposit?

5 A. Right, yes.

6 Q. So you testified about a pattern a number of times. And
7 as I got it, the pattern was an entity is formed and
8 registered with the Secretary of State during -- during the
9 pandemic period. That was one thing that you noticed in
10 this pattern, right?

11 A. Sure.

12 Q. And then -- and then typically shortly after, in this
13 pattern that you talked about, shortly after the entity is
14 formed, the bank account is opened, right?

15 A. Right.

16 Q. And then there's a flurry of activity, right?

17 A. Right.

18 Q. Food program money, right?

19 A. Yes.

20 Q. And I think there was one account where you described
21 that pattern happening for a bank account that had been
22 dormant for a long period of time, right?

23 A. Right.

24 Q. But then food program money starts flooding in, right?

25 A. Yes.

1 Q. Can we scroll down to April 1st, please.

2 Okay. April 1st there is a deposit of \$95,000,
3 CACFP food. Do you see that?

4 A. Right, yes.

5 Q. From ThinkTechAct Foundation?

6 A. Yes.

7 Q. And U.S. Bank?

8 A. Yeah.

9 Q. As I looked at it, but correct me if I'm wrong, that's
10 the first money coming into this account that is identified
11 as being connected with one or the other of these food
12 programs. Does that sound right?

13 A. I believe so.

14 Q. So in the pattern that you described of business formed,
15 bank account open, money whooshing in, this doesn't fit that
16 pattern, does it?

17 A. This is a different pattern; however, it was still used
18 in a similar way as the other LLCs.

19 Q. Okay. So for the first three months and change, four
20 months of -- three months, three months of 2021, the Afrique
21 account is used for things not related to the food program.
22 At least no food program money is coming in. Is that fair?

23 A. Right.

24 Q. With an initial investment into that account of 500 --
25 more than half a million dollars, right?

1 A. Sure, yes.

2 Q. That is not, at least as you know or have been able to
3 identify, connected with food program money, right?

4 A. Not that I'm aware of.

5 Q. Okay. Okay. Yeah, let's go back to page 1.

6 The summary charts that you've testified about,
7 and this is an example, these are descriptions of money
8 coming into one or more accounts and money going out of one
9 or more accounts, right?

10 A. Right.

11 Q. And so for the food expense component of that, this is
12 money that you've identified as coming -- going out of this
13 account for purchases of food, right?

14 A. Right.

15 Q. During the time frame identified, the period of review,
16 January 7th, 2021, to June 14th, 2022, right?

17 A. Yes, that's right.

18 Q. Okay. I want to ask -- I want to ask a couple of
19 questions -- we can leave this up, but I want to ask a
20 couple questions about kind of the time frame of actual
21 payments under the food programs, right?

22 A. Okay.

23 Q. So -- so a bunch of searches -- search warrants were
24 executed on January 20th of 2022, right?

25 A. Right.

1 Q. I think there was talk about two dozen or more on that
2 day alone, right? Yes?

3 A. Yes. Sorry. Yes.

4 Q. And it was not a secret. I mean, there was -- there was
5 publicity. It was much comment in the media, and it was
6 well covered? Yes?

7 A. Sure, yes.

8 Q. And there was -- am I right that food program spending,
9 that is, money from the MDE to sponsors for claims that had
10 been submitted, did that stop -- I mean, were there any
11 payments that came from the Department of Education after
12 the search warrants were executed, to your knowledge?

13 A. I think for the stop payments, which apply to Feeding
14 Our Future and Partners in Nutrition, no.

15 Q. So at least -- at least for any of the sites and any of
16 the entities and any of the individuals that we're here
17 about in this courtroom today, there were no payments after
18 January 20th of 2022? Is that fair?

19 A. Yes, I would say the payments were not made. However,
20 the Partners in Nutrition continued to submit claims to MDE
21 hoping for a reimbursement at a later date.

22 Q. Okay. So I'm actually asking -- so if money -- if
23 money -- no money actually was distributed after
24 January 20th, 2022?

25 A. I believe that's right.

1 Q. Right? Why did it stop -- when was the most recent
2 payment before that to -- made in connection with the
3 Dar Al-Farooq site, if you know?

4 A. I don't know off the top of my head. I would have to
5 check.

6 Q. I think if we look at -- we may get a little bit of an
7 answer. Can we look at N-4 again, please?

8 Okay. So this is meals claimed, not money
9 actually paid, right?

10 A. Right.

11 Q. But the -- at least for all but just a couple of sites,
12 there's nothing for January or February, right?

13 A. Right.

14 Q. So even in terms of claims being made for meals, those
15 stopped for all intents and purposes in December of 2021,
16 right?

17 A. Right.

18 Q. Do you know -- can you estimate -- I understand you
19 don't have the numbers at your fingertips. But can you
20 estimate when the money actually stopped getting paid and
21 distributed for the Dar Al-Farooq site?

22 A. I -- I would need to review. I don't know off the top
23 of my head. I believe that the payments for that month
24 would have been going to ThinkTechAct Foundation.

25 Q. Okay.

1 A. So it could have been a December or early January
2 payment, I would just have to double-check.

3 Q. Or a November payment, depending on --

4 A. Well, it's a November payment, but the sponsor would not
5 pay it out until sometimes one or two months later.

6 Q. Okay.

7 A. If that makes sense.

8 Q. Okay. Are we -- can we at least say with some comfort
9 that the last month for which money was actually paid to --
10 to the sponsor for the Dar Al-Farooq site was before
11 January 20th, '22?

12 A. Yes, the last claims were for November of '21.

13 Q. Okay. Last claims submitted for the Dar Al-Farooq site?

14 A. Yes.

15 Q. And do you know whether those claims were paid and
16 processed or not?

17 A. Those would have been paid, yes.

18 Q. Okay. Okay. So last money that -- last actual money
19 that came from the food program through the sponsor for the
20 Dar Al-Farooq site related to claims made for the month of
21 November 2021?

22 A. Right.

23 Q. Any food that was delivered at that site in December or
24 in January then would not have been the subject of claims
25 that were made or processed.

1 I'm sorry. Let me break that down because --
2 any -- any food activity in December or January,
3 December '21, January '22, for the Dar Al-Farooq site, would
4 not have been compensated -- would not have been paid
5 because the last payment was for November claims, right?

6 A. I don't know if -- so I don't know if there were any
7 claims submitted by the individuals to the sponsor for
8 December of 2021. So there's that part. And, also, I don't
9 know if there was any food purchased for the Dar Al-Farooq
10 site --

11 Q. Getting there.

12 A. -- for December.

13 Q. We'll get there.

14 A. Okay. But then, also, I don't know where the food would
15 be delivered to. It would not be Afrique.

16 Q. I'm not asking those questions.

17 A. Okay.

18 Q. I'm just saying that if there was any food provided at
19 Dar Al-Farooq in December or January, that was not the
20 subject of any -- any compensation for those meals that came
21 from the state, because the last compensation was for
22 November?

23 A. Sure, yeah.

24 Q. Okay. We've been talking about Dar Al-Farooq. It's
25 your understanding, though, that under the Dar Al-Farooq

1 site they actually distributed at two locations, right? The
2 Dar Al-Farooq mosque and the Oak Grove Middle School?

3 A. Yes.

4 Q. Okay.

5 A. Or no, I'm sorry, not the Oak Grove. The
6 1506 Southcross is what I'm aware of and Dar Al-Farooq.
7 Those are the two I'm aware of.

8 Q. Okay. Do you remember the testimony of Dinna
9 Wade-Ardley?

10 A. Yes.

11 Q. A government witness? And she was associated with the
12 Oak Grove Middle School, right?

13 A. Yes.

14 Q. Remember that she saw some pictures and identified
15 herself as somebody who was there. I don't remember if she
16 was supervising, but she was one of the people in the
17 pictures as food was being distributed, right?

18 A. Yes.

19 Q. At the Oak Grove Middle School?

20 A. Right, yes.

21 Q. And she identified that the people that she was working
22 with and the food that was a part of that was coming in
23 connection with Dar Al-Farooq, right?

24 A. Yes.

25 Q. And she used the name -- she referred to him as Shariff?

1 A. Shariff.

2 Q. Right?

3 A. Right, yes.

4 Q. But she identified -- pointed to him in the courtroom as
5 the person she was associated with, right?

6 A. Right, yes.

7 Q. So one site, officially Dar Al-Farooq, but at least two
8 distribution locations. The mosque itself, right?

9 A. Sure.

10 Q. And the Oak Grove Middle School? Yes?

11 A. I don't know. It's -- that would not have been an
12 approved location. The only approved location was the
13 Dar Al-Farooq site.

14 Q. I'm not asking about approval. I'm asking about if you
15 understand that that was a place that food facilitated by
16 Dar Al-Farooq was distributed, the Oak Grove Middle School?

17 A. I don't know. It was not an approved site.

18 Q. Are you saying that her testimony -- you don't believe
19 it? You were here for it, right?

20 A. I believe that food was delivered at that site, but it
21 was not an approved site. So really those meals should not
22 have been counted for reimbursement. It should only have
23 been at the Dar Al-Farooq site. That was the only approved
24 site.

25 Q. I'm not -- and if -- if that was a rule violation, then

1 that would be a regulatory violation, but I'm asking you not
2 about your opinion about what the rules say. I'm asking you
3 about your understanding of what actually happened.

4 A. Sure.

5 Q. Okay. So what actually happened was that Dar Al-Farooq
6 provided meals at the Oak Grove Middle School? Yes?

7 A. Sure.

8 MR. MOHRING: Okay. I have a new chapter, Your
9 Honor. I can start.

10 THE COURT: That's fine. We can take that up
11 tomorrow morning.

12 So we'll break for the day, and you're all coming
13 back at 11:00 tomorrow morning.

14 All rise for the jury.

15 (Court adjourned at 4:57 p.m., 05-22-2024.)

16 * * *

17 I, Renee A. Rogge, certify that the foregoing is a
18 correct transcript from the record of proceedings in the
19 above-entitled matter.

20 Certified by: /s/Renee A. Rogge
21 Renee A. Rogge, RMR-CRR

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