

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

DIGITALLY RECORDED

SWORN STATEMENT

OF

CHRIS RECAMIER

OIG CASE #:

2021-009252

DEPARTMENT OF JUSTICE

OFFICE OF THE INSPECTOR GENERAL

OCTOBER 8, 2021

RESOLUTE DOCUMENTATION SERVICES
28632 Roadside Drive, Suite 285
Agoura Hills, CA 91301
Phone: (818) 431-5800

LIMITED OFFICIAL USE

2

1 APPEARANCES:

2

3 OFFICE OF THE INSPECTOR GENERAL

4 BY: KERWIN JOHN

5 BY: HARRY LIDSKY

6

7

8 WITNESS:

9 CHRIS RECAMIER

10

11

12 OTHER APPEARANCES:

13 NONE

14

15

16

17

18

19

20

21

22

23

24

25

26

LIMITED OFFICIAL USE

3

1 MR. LIDSKY: Did you want that?

2 MR. JOHN: No.

3 MR. LIDSKY: Is this for you?

4 MR. JOHN: Do you want it?

5 MR. LIDSKY: Yeah. (Indiscernible

6 *00:00:08). Otherwise, I'll drink it. We have
7 plenty more.

8 MR. JOHN: Yeah.

9 MR. LIDSKY: Are we good?

10 MR. JOHN: Yeah.

11 MR. LIDSKY: Oh, I'm sorry. Okay. Chris,
12 thank you for your patience.

13 MR. RECAMIER: Sure.

14 MR. LIDSKY: As I said in the car, we are
15 just, you know, kind of re-doing what we have
16 talked about. Both at the apartment and in the
17 car ride. So, let me introduce myself. My
18 name is Harry Lidsky. I know it was quick when
19 we first met. But my name is Harry Lidsky.
20 I'm an agent with the Department of Justice,
21 Office of the Inspector General. We talked
22 about why we knocked on your door. We executed
23 a search warrant at your apartment, as you
24 know, you saw a copy of that warrant. You will
25 be provided with a copy.

LIMITED OFFICIAL USE

4

1 We left one at the apartment, as well. We
2 discussed a number of procedural things
3 (Indiscernible *00:01:41). And I also provided
4 you with your Miranda warnings, just verbally,
5 and as I said when we got back to the office, I
6 wanted to do it in writing, as well. So, we
7 will go ahead and do that now. Before, when we
8 were at the apartment - and I realize this is
9 redundant - but I know you speak with a French
10 accent. I asked you your nationality, you did
11 say you were a citizen of France.

12 MR. RECAMIER: Mm-hmm.

13 MR. LIDSKY: And we will notify the
14 consulate, as required. But, you know, it is
15 clear that you understand English. I asked you
16 if you understand English. You acknowledged
17 that you were proficient enough, and we have
18 conversed accordingly. So, I'm just going to -
19 . I'll give one copy. These are identical.

20 MR. RECAMIER: Okay.

21 MR. LIDSKY: I'll just read along. I'll
22 read it to you, you can read along with me. We
23 found glasses. We let you bring those. And
24 I'll just ask you when we are done. And
25 certainly, if you have any questions, and

LIMITED OFFICIAL USE

5

1 require any clarity on any of these, feel free
2 to ask, and I'll just ask if you understand
3 each. So, before we ask you any questions, or
4 you make any statement, you must understand
5 your rights.

6 "You have the right to remain silent and
7 refuse to answer any questions at any time.
8 Anything you say can be used against you in a
9 court of law or other proceedings. You have
10 the right to talk to a lawyer for advice,
11 before answering any questions, and to have a
12 lawyer with you during any questioning, now or
13 in the future. If you cannot afford a lawyer,
14 one will be provided for you without cost. If
15 you decide to answer questions now, you have
16 the right to stop answering questions at any
17 time you desire."

18 And then, what I'm going to ask is, for
19 you to ensure that you understand the following
20 statement. I will read it out loud. "I have
21 read the statement of my rights, and I
22 understand what my rights are. I am willing to
23 make a statement and answer questions. I
24 understand I know what I am doing. No promises
25 or threats have been made to me, and no

LIMITED OFFICIAL USE

6

1 pressure or coercion of any kind has been used
2 against me." If you have any questions about
3 that, I am happy to answer, do you understand
4 all of the rights and warnings that are on this
5 form?

6 MR. RECAMIER: Yeah, I do.

7 MR. LIDSKY: Now, I've read you these
8 rights. I read you Miranda back at the
9 apartment. We spoke fairly informally. I
10 mean, we were seated at the corner and you
11 were, we were executing a search warrant. So,
12 it wasn't as formal as sitting here in the
13 office. But I would like to go over just the
14 questions we covered at the apartment, and some
15 in the car. There were some you did not want
16 to answer, and that is perfectly fine. That is
17 your right. It still is. And as the, you
18 know, it's not one of the rights on here, but
19 you can choose which questions you would like
20 to answer, and which ones you prefer not to
21 answer. And that is fine. So, if you are
22 willing, I would like to just cover some of the
23 ground we have already covered. But in order
24 to do that, I would --

25 MR. RECAMIER: Right.

LIMITED OFFICIAL USE

7

1 MR. LIDSKY: -- ask for us all to sign and
2 date this form, indicating that we are willing
3 to go forward and do that.

4 MR. RECAMIER: Yeah. Okay.

5 MR. JOHN: Okay.

6 MR. LIDSKY: Thank you. You can just sign
7 your copy. So, you would be there. And then,
8 the next line down, if you could just print
9 your name. And then --

10 MR. RECAMIER: What day is today?

11 MR. LIDSKY: -- it is already Friday,
12 October 8th.

13 MR. RECAMIER: Gotcha.

14 MR. LIDSKY: And we are in New York, New
15 York. Oh, and the time is 1:15 a.m.

16 MR. RECAMIER: There you go.

17 MR. LIDSKY: Thank you. And I will sign
18 here. And Kerwin, you sign there. This is
19 Kerwin John. I know we all kind of --

20 MR. RECAMIER: Yes.

21 MR. LIDSKY: -- met informally out there.
22 I don't know. So, one of the things we talked
23 about, obviously, when we came in, I, you know,
24 I wanted to ensure that you knew why we were
25 there, and what this was about.

LIMITED OFFICIAL USE

8

1 MR. RECAMIER: Mm-hmm.

2 MR. LIDSKY: In doing so, I mentioned a
3 few of the names that I know you as, through
4 the course of this investigation. Just, you
5 know, I wanted to make sure you know who, you
6 know, I want you to know, you know, this is
7 serious, and know that this is, you know, a
8 pretty thorough investigation. And we know
9 what we are talking about. And so, you
10 acknowledged that. You know, I did ask you to
11 own any of those, but I did ask for your actual
12 name, date of birth, and social security
13 number, which you provided. Thank you. You
14 know, we were going to, obviously, we are going
15 to print you. I informed you that if you
16 wanted to be booked in as John Doe, you know,
17 you can't get bail until the court finds out
18 who you really are. So, you, you know, you
19 accepted that.

20 MR. RECAMIER: Mm-hmm.

21 MR. LIDSKY: You understood that. You
22 provided your name. Your true name and date of
23 birth. Your social security number. I've
24 checked that. It's real. So, thank you for
25 that. I asked you if understood English. I

LIMITED OFFICIAL USE

9

1 think we covered this. You said you did and
2 you are willing to keep talking English, and I
3 appreciate that because we don't speak French.
4 We are aware, I asked you your nationality.
5 You are a French citizen. And so, we will
6 notify the consulate, of course, tomorrow, or
7 we will follow whatever the requirements are.

8 Admittedly, I haven't arrested a foreign
9 national in a while. So, I am not -. I will
10 have to refresh the process, with regard to
11 that. We also, I asked you if you were under
12 the influence of any alcohol or drugs. You
13 acknowledged that you do have an addiction, a
14 substance abuse problem. So, we appreciate
15 that, and you are lucid, you understand what is
16 going on. You haven't used in a while.

17 MR. RECAMIER: Yeah.

18 MR. LIDSKY: And I mentioned to you, too,
19 it is important when the court, you know, asks
20 you these questions, please be honest. They
21 are more for your health. We are not -. This
22 is not a drug investigation. You are not being
23 charged with any drug offenses. Through our
24 conversation, I have learned that you have a
25 current case in the city of New York, regarding

LIMITED OFFICIAL USE

10

1 drug offenses. You are represented there. We
2 are not asking any questions about that.

3 MR. RECAMIER: Okay.

4 MR. LIDSKY: Aside from your history.
5 Please don't offer up any information about
6 that case, without your attorney at least being
7 present for that. We are not interested, and
8 any questions that we ask you are not designed
9 to elicit a response regarding that
10 investigation.

11 MR. RECAMIER: Okay.

12 MR. LIDSKY: And if they seem to, then
13 please, you know, tell us, because we are going
14 down the wrong path. Other than that, we asked
15 you a couple of questions about things in the
16 apartment that, you know, do they belong to
17 you, or do they belong to your associate, Mr.
18 Ilori. So, I informed you that, you know, we
19 knew about him. We know about him. We know
20 about his role. We are certainly curious to
21 learn more about the roles.

22 MR. RECAMIER: Mm-hmm.

23 MR. LIDSKY: Admittedly, there is some
24 gaps in what we know, or we would certainly
25 like affirmation of some of the things that we

LIMITED OFFICIAL USE

11

1 believe to be true, and I think you are able to
2 fill in those gaps, if you desire to do so. I
3 also informed you of how the federal system
4 works. You have admittedly been arrested at
5 the state level, but not at the federal level,
6 and you asked me if this was federal or NYPD.
7 And I told you that it was federal.

8 In the federal system, anybody who is
9 deemed to have cooperated and provided
10 substantial assistance to the government with
11 regard to an investigation, can be entitled to
12 a reduction in their sentence. That reduction
13 is made by the judge, at his or her discretion.
14 We cannot promise any reduction in exchange for
15 cooperation. The way it works in the federal
16 system is, if you cooperate with us, with our
17 investigation, we will make a recommendation
18 through the U.S. Attorney's Office, to the
19 court, that you are eligible, that you should
20 be eligible and considered for substantial
21 assistance reduction.

22 But the judge can disagree unilaterally,
23 and not afford it. So, the takeaway there is
24 we can't make any promises. I informed you
25 that we would certainly like your cooperation.

LIMITED OFFICIAL USE

12

1 We are interested in it. I told you, honestly,
2 that we know you are not alone in this.

3 MR. RECAMIER: Mm-hmm.

4 MR. LIDSKY: And you have an opportunity
5 to help us out. And, you know, that choice is
6 yours. I also told you that, you know, there
7 would come a time where, you know, you have to
8 decide whether or not you want to help, and to
9 the degree you want to help. And you are, you
10 know, that is a choice you have to make
11 voluntarily. And of your own volition.

12 MR. RECAMIER: Mm-hmm.

13 MR. LIDSKY: So, and that stands. And we
14 talked about that. We asked you - we found
15 your cell phone - we did ask you for the
16 passcode and you declined to give it, and that
17 is perfectly within your rights. And you can
18 answer this question and not that question.
19 And that is fine. It's no hard feelings. And
20 that, you can continue along that line.

21 MR. RECAMIER: Mm-hmm.

22 MR. LIDSKY: We asked you what in the
23 apartment was yours versus Mr. Ilori's. You
24 know Mr. Ilori as - in his true name - as Mr.
25 Ilori. Do you know his first name?

LIMITED OFFICIAL USE

13

1 MR. RECAMIER: Yeah.

2 MR. LIDSKY: Do you mind telling me his
3 first name?

4 MR. RECAMIER: Adedayo.

5 MR. LIDSKY: Adedayo. Okay. So, we are
6 pronouncing it the same. I imagine you
7 recognize a picture of Mr. Ilori if I showed
8 you one?

9 MR. RECAMIER: Yeah.

10 MR. LIDSKY: Okay. Do you mind if I show
11 you one? It's just to --

12 MR. RECAMIER: Mm-hmm.

13 MR. LIDSKY: -- make sure we are talking
14 about the same person.

15 MR. JOHN: You have one handy?

16 MR. LIDSKY: I got one.

17 MR. JOHN: If you could send me one, I
18 could print it.

19 MR. LIDSKY: Oh, I'll pull it up. Let me
20 just say I'm sorry. And I do appreciate your
21 patience. I know it is late.

22 MR. RECAMIER: Yeah.

23 MR. LIDSKY: I know this was --

24 MR. RECAMIER: Yeah.

25 MR. LIDSKY: -- I wish we could have done

LIMITED OFFICIAL USE

14

1 this a bit earlier, as well. I am sure you
2 feel likewise.

3 MR. RECAMIER: That's fine.

4 MR. LIDSKY: Thank you for your
5 understanding and patience with us. Okay. Is
6 that -? Are we talking about the same person?

7 MR. RECAMIER: Yeah.

8 MR. LIDSKY: Okay. Were you with Mr.
9 Ilori today?

10 MR. RECAMIER: Yeah.

11 MR. LIDSKY: You were with Mr. Ilori in
12 Chipotle --

13 MR. RECAMIER: Mm-hmm.

14 MR. LIDSKY: -- late this afternoon.
15 Okay. So, we are talking about the same
16 person. What did we cover? Oh, I did, in the
17 car, I asked you, I noticed, you know, this
18 investigation, of course, you know, as I have
19 mentioned, I rattled off a number of the
20 aliases, or the identities that we were aware
21 of, a number of them. I did notice that there
22 were no IDs. I have a number - and I am happy
23 to show you, if you want - I have a number of
24 IDs with your picture on them.

25 MR. RECAMIER: Mm-hmm.

LIMITED OFFICIAL USE

15

1 MR. LIDSKY: But I didn't find any of
2 those in the apartment, nor did I find any of
3 the credit cards, or debit cards --

4 MR. RECAMIER: Mm-hmm.

5 MR. LIDSKY: -- that go along with the
6 bank accounts associated with those IDS. So, I
7 asked you, you know, does he have all of those?

8 MR. RECAMIER: Mm-hmm.

9 MR. LIDSKY: And you said that he did.

10 MR. RECAMIER: Mm-hmm.

11 MR. LIDSKY: Does he just not trust you
12 with them, or I mean, why does he --?

13 MR. RECAMIER: No. I mean, like, we
14 usually have -. We would, I mean, you know
15 that kind of thing got around. So, we use the
16 credit card when we go outside. I mean, like,
17 and we are not using them that much, anyway.

18 MR. LIDSKY: Mm-hmm. Gotcha. I mean, the
19 accounts are kind of depleted.

20 MR. RECAMIER: Yeah.

21 MR. LIDSKY: Right? A lot of them are. I
22 mean, have you ever had one? Does he let you -
23 -

24 MR. RECAMIER: Yeah.

25 MR. LIDSKY: -- okay.

LIMITED OFFICIAL USE

16

1 MR. RECAMIER: Yeah. He does.

2 MR. LIDSKY: Like, do you each have one?

3 Just on the same account, or he -?

4 MR. RECAMIER: No. It is very, like, I
5 mean, like, he give me one, like, sometimes,
6 you know, like --

7 MR. LIDSKY: Just to go out, buy --

8 MR. RECAMIER: Yeah.

9 MR. LIDSKY: -- buy whatever. Okay. So,
10 sometimes him, sometimes --

11 MR. RECAMIER: Uh-huh.

12 MR. LIDSKY: -- it's you, but he holds all
13 the IDs?

14 MR. RECAMIER: Yeah.

15 MR. LIDSKY: Does he just give them to you
16 when it's time for you to go in --

17 MR. RECAMIER: Yeah.

18 MR. LIDSKY: -- so, we --

19 MR. RECAMIER: Mm-hmm.

20 MR. LIDSKY: -- so, one of the other
21 things we brought up was the car. You know,
22 obviously --

23 MR. RECAMIER: Mm-hmm.

24 MR. LIDSKY: -- we are aware of the car.

25 MR. RECAMIER: Okay.

LIMITED OFFICIAL USE

17

1 MR. LIDSKY: And when - just so we are
2 talking about the same car --

3 MR. RECAMIER: Mm-hmm.

4 MR. LIDSKY: -- is it September, late
5 September?

6 MR. RECAMIER: Uh-huh. Yeah.

7 MR. LIDSKY: At the Mercedes dealership?

8 MR. RECAMIER: Mm-hmm.

9 MR. LIDSKY: Right up the street?

10 MR. RECAMIER: Yeah.

11 MR. LIDSKY: Right? And you all leased --

12 MR. RECAMIER: Mm-hmm.

13 MR. LIDSKY: -- a -. Well, I'll let you
14 (Indiscernible *00:16:36). I know the answer,
15 but --

16 MR. RECAMIER: 580.

17 MR. LIDSKY: -- the 580. S-580 --

18 MR. RECAMIER: Mm-hmm.

19 MR. LIDSKY: -- that's a beautiful car.

20 MR. RECAMIER: Yeah.

21 MR. LIDSKY: It's a beautiful car. So,
22 for that ID, I think that was --

23 MR. RECAMIER: Mm-hmm.

24 MR. LIDSKY: -- Thomas Hockinberry
25 (Phonetic Sp. *00:16:51).

LIMITED OFFICIAL USE

18

1 MR. RECAMIER: Yeah.

2 MR. LIDSKY: So, did he just give you it
3 and said, go in, I want that one?

4 MR. RECAMIER: Well, I mean, he is the one
5 who paid for the ID and everything. So.

6 MR. LIDSKY: So, that is interesting. So,
7 where did the IDs come from? So, he buys them?
8 He doesn't make them?

9 MR. RECAMIER: No.

10 MR. LIDSKY: No?

11 MR. RECAMIER: He doesn't --

12 MR. LIDSKY: He doesn't make it.

13 MR. RECAMIER: -- make it.

14 MR. LIDSKY: Do you know who he gets them
15 from?

16 MR. RECAMIER: No. I mean, like, on the
17 dark web, but -.

18 MR. LIDSKY: Oh. There are that many out
19 there?

20 MR. RECAMIER: Yeah.

21 MR. LIDSKY: Jesus. So, but so, he had
22 that ID?

23 MR. RECAMIER: Mm-hmm.

24 MR. LIDSKY: And did he just pick you up
25 and say, here, this is you today, go in and buy

LIMITED OFFICIAL USE

19

1 the white Mercedes?

2 MR. RECAMIER: I mean, yeah. You could,
3 the way you put it, it sounds funny, but that's
4 (Indiscernible *00:17:43).

5 MR. LIDSKY: I mean, is that -? And so,
6 you just say, okay, you know --

7 MR. RECAMIER: Yeah.

8 MR. LIDSKY: -- be right back?

9 MR. RECAMIER: Be right back.

10 MR. LIDSKY: And you come back, and just
11 flip him the keys?

12 MR. RECAMIER: Yeah.

13 MR. LIDSKY: Does he go in with you?

14 MR. RECAMIER: Yeah. He came with me
15 inside the --

16 MR. LIDSKY: To the dealership?

17 MR. RECAMIER: -- to get the car. Yeah.

18 MR. LIDSKY: And a couple times to the,
19 just so, for the car? Like, a couple of the
20 banks, as well?

21 MR. RECAMIER: No. To the car. Not to
22 the bank.

23 MR. LIDSKY: Why doesn't he go into the
24 banks? Does he not want to be on camera?

25 MR. RECAMIER: I mean, that he went to, to

LIMITED OFFICIAL USE

20

1 get money at the bank, yeah, but, like, when
2 they opened a new account, he didn't always
3 have to be there.

4 MR. LIDSKY: He doesn't. Yeah. So, that
5 was your role.

6 MR. RECAMIER: Mm-hmm.

7 MR. LIDSKY: And that was his role. Now,
8 in the car, I asked you, you know, what do you
9 get out of it, and you didn't answer, and
10 that's fine if you don't want to. I am
11 curious. I mean, he seems to -.

12 MR. RECAMIER: I mean, that's how I met
13 him, living, like --

14 MR. LIDSKY: So --

15 MR. RECAMIER: -- for quite a few months.

16 MR. LIDSKY: -- okay. So, it is just some
17 living expenses, cash --

18 MR. RECAMIER: Yeah.

19 MR. LIDSKY: -- the cards, to buy --

20 MR. RECAMIER: Mm-hmm.

21 MR. LIDSKY: -- things from time to time.

22 Okay. That makes sense. I also asked you -
23 see, and I apologize, because I know I'm all
24 over the map, but it is late for me, too -
25 where you were living. You said most recently,

LIMITED OFFICIAL USE

21

1 you don't have a home, and you have been
2 staying at the apartment.

3 MR. RECAMIER: Yeah. I rent his
4 apartment. Yeah.

5 MR. LIDSKY: And so --

6 MR. RECAMIER: Yeah.

7 MR. LIDSKY: -- that was another one.
8 That was -. And when you answered the door, of
9 course, I greeted you by the name Mark Hefron
10 (Phonetic Sp. *00:19:14).

11 MR. RECAMIER: Mm-hmm.

12 MR. LIDSKY: I think is the name the
13 apartment is leased in. And that is, you know,
14 that is another alias we know. We think we
15 have the real Mark Hefron --

16 MR. RECAMIER: Mm-hmm.

17 MR. LIDSKY: -- ID. We know it is not
18 you. It is your picture. So, did he just say,
19 today, you are mark Hefron, go rent, you know,
20 a one-bedroom?

21 MR. RECAMIER: Well, actually, I was
22 looking for an apartment, and --

23 MR. LIDSKY: Oh, okay.

24 MR. RECAMIER: -- so.

25 MR. LIDSKY: So, it made sense.

LIMITED OFFICIAL USE

22

1 MR. RECAMIER: Yeah.

2 MR. LIDSKY: So, does he pay and say,
3 listen, I will pay, you can stay there when you
4 want --

5 MR. RECAMIER: Mm-hmm.

6 MR. LIDSKY: -- and we will use this --

7 MR. RECAMIER: Yeah.

8 MR. LIDSKY: -- for our office? Okay.
9 Yeah. You know, we have seen a lot of the
10 documents, you know, the registration for some
11 of the companies and the companies. I mean,
12 there is Safe Air, East Coast Air.

13 MR. JOHN: Moola Apps (Phonetic Sp.
14 *00:20:06).

15 MR. LIDSKY: Moola Apps. JetAway
16 (Phonetic Sp. *00:20:07) jets.

17 MR. RECAMIER: Mm-hmm.

18 MR. JOHN: App sensible (Phonetic Sp.
19 *00:20:09).

20 MR. LIDSKY: App sensible. Twinway
21 (Phonetic Sp. *00:20:12)?

22 MR. RECAMIER: Yeah.

23 MR. LIDSKY: And then, there was some in
24 individuals. Hockinberry. I think you guys
25 got declined for a PPP loan on Hockinberry. Do

LIMITED OFFICIAL USE

23

1 you even -?

2 MR. RECAMIER: Yeah. Some of them got
3 declined, I know.

4 MR. LIDSKY: So, are you involved in that
5 part of it, or is that all him?

6 MR. RECAMIER: What?

7 MR. LIDSKY: Like, for the submitting the,
8 like, the PPP loans online.

9 MR. RECAMIER: I mean, I worked on the
10 tax.

11 MR. LIDSKY: I'm sorry?

12 MR. RECAMIER: I was making the tax.

13 MR. LIDSKY: Oh, the documents?

14 MR. RECAMIER: Yeah.

15 MR. LIDSKY: So, like, the state
16 registration record?

17 MR. RECAMIER: No. Just the tax.

18 MR. LIDSKY: Or -? Oh, the tax documents?

19 MR. RECAMIER: Uh-huh.

20 MR. LIDSKY: Gotcha. So, that was kind of
21 your role. And then, he --

22 MR. RECAMIER: Mm-hmm.

23 MR. LIDSKY: -- he would take care of
24 everything else. Okay. Did he -. I mean,
25 whose idea was it to, you know, let's do

LIMITED OFFICIAL USE

24

1 another one in this name? I mean, how, just
2 how, or did it work? Break down, you know, how
3 it -.

4 MR. RECAMIER: I mean, you know, I can't,
5 I don't know initially want to, I want to talk
6 -.

7 MR. LIDSKY: Okay. No. That's fine if -.
8 That's fine. We, you know, we took a bunch of
9 documents out. We saw all of the, you know, a
10 lot of the bank statements, so, a lot of tax
11 forms. There was a Chase bank statement.

12 MR. RECAMIER: Okay.

13 MR. LIDSKY: That has, like, Facebook wire
14 transfers and stuff. I think it was used for
15 just kind of to show solvency from some of the
16 companies.

17 MR. RECAMIER: Okay.

18 MR. LIDSKY: Is that a document you are
19 familiar with?

20 MR. RECAMIER: I am not sure which you are
21 looking at.

22 MR. LIDSKY: If I showed it to you?

23 MR. RECAMIER: Yeah.

24 MR. LIDSKY: Might it jog a memory? I
25 mean, if, would you be willing to, if I can

LIMITED OFFICIAL USE

25

1 find it, would you be willing to talk about
2 that one?

3 MR. RECAMIER: Yeah. I mean, like, if I
4 know what it is. Yeah.

5 MR. LIDSKY: Okay.

6 MR. RECAMIER: Yeah.

7 MR. LIDSKY: Let me see. I think I've got
8 a copy of it. Do you know - while I'm looking
9 for that - do you know some of his associates?

10 MR. RECAMIER: No.

11 MR. LIDSKY: Oh, where do I have that? Do
12 you have that Chase -?

13 MR. JOHN: Which one?

14 MR. LIDSKY: That recycled Chase doc.

15 MR. JOHN: I got it buried somewhere. I
16 think it was in the zip package.

17 MR. LIDSKY: That's right. That's where
18 it was.

19 MR. JOHN: Mm-hmm.

20 MR. LIDSKY: Yeah. Bear with me. I'm
21 sorry, Chris.

22 MR. RECAMIER: That's fine.

23 MR. LIDSKY: And Recamier.

24 MR. RECAMIER: Mm-hmm.

25 MR. LIDSKY: Okay. I got it.

LIMITED OFFICIAL USE

26

1 MR. RECAMIER: What?

2 MR. LIDSKY: I butchered it enough times.
3 You asked me to just call you Chris. I
4 appreciate it.

5 MR. RECAMIER: Mm-hmm.

6 MR. LIDSKY: I've got a copy right here.
7 Yeah. A safe error. John Croaks (Phonetic Sp.
8 *00:23:18). John Litbow (Phonetic Sp.
9 *00:23:21).

10 MR. RECAMIER: Mm-hmm.

11 MR. LIDSKY: That's another one.

12 MR. RECAMIER: Yeah.

13 MR. LIDSKY: How many were there?

14 MR. RECAMIER: Hmm.

15 MR. LIDSKY: And while you are thinking,
16 this is another area where we discussed --

17 MR. RECAMIER: Mm-hmm.

18 MR. LIDSKY: -- you know, it is not always
19 talking about other, you know, helping,
20 substantial assistance can come in many forms.
21 In this case, we have a number of victims,
22 obviously, whose identity has been stolen, and
23 making them whole again, you know, helping them
24 as victims, helping us identify them, and --

25 MR. RECAMIER: Mm-hmm.

LIMITED OFFICIAL USE

27

1 MR. LIDSKY: -- and getting them back to
2 normal might also be a way where you could sort
3 of give back.

4 MR. RECAMIER: Mm-hmm.

5 MR. LIDSKY: And so, that is another
6 opportunity that we discussed. There was also
7 some documents that looked a bit confusing on
8 their face, and helping put context to some of
9 those, and what they mean, that might be
10 another way, as well. Hmm. Oh, so, while I am
11 looking, do you know how many there were? Or
12 did you even keep track?

13 MR. RECAMIER: I can't -. I mean, like,
14 maybe 15, 20.

15 MR. LIDSKY: Okay. So, we got most of
16 them, I guess. Is there, like, a master list
17 of them somewhere? Does he keep a list of kind
18 of who's who?

19 MR. RECAMIER: I mean, like, if you check
20 all the files, and all the computer, like --

21 MR. LIDSKY: Is there --

22 MR. RECAMIER: -- it is a gray computer.
23 It handles the phone and you have everybody on
24 it.

25 MR. LIDSKY: Like, in, like, on the

LIMITED OFFICIAL USE

28

1 computer, or, like, in a file?

2 MR. RECAMIER: Well, you know, like, on
3 the email on the computer. Uh-huh.

4 MR. LIDSKY: On the email?

5 MR. RECAMIER: You have some of the
6 people, and on the phones, and you have the
7 rest of the people.

8 MR. LIDSKY: Okay. Okay. Understood.
9 Thank you. That is helpful, too. Just helping
10 us kind of get through all this is also helpful
11 and much appreciated. I'm sorry. I'm some
12 other place here. So, were you kind of the tax
13 documents specialist, and he took care of
14 everything else?

15 MR. RECAMIER: No. I mean, like, it was
16 just, like, he transacts like he wants to do,
17 you know?

18 MR. LIDSKY: Okay. It's just -. I'm
19 sorry.

20 MR. RECAMIER: Doesn't understand exit
21 tax.

22 MR. LIDSKY: Oh.

23 MR. RECAMIER: So.

24 MR. LIDSKY: Gotcha. So, there was one
25 bank. I think it was M&T (Phonetic Sp.

LIMITED OFFICIAL USE

29

1 *00:25:54).

2 MR. RECAMIER: Mm-hmm.

3 MR. LIDSKY: Where you all, I mean, are
4 you, I mean, I believe you went in. I think he
5 got -. It was, you all - I say you and Mr.
6 Ilori - I assume it's all of this is you and
7 Mr. Ilori. Were any of these just you, or just
8 him?

9 MR. RECAMIER: Yeah. Like, I went just by
10 myself at M&T.

11 MR. LIDSKY: But he knew --

12 MR. RECAMIER: Yeah.

13 MR. LIDSKY: -- that you were going,
14 right?

15 MR. RECAMIER: Mm-hmm.

16 MR. LIDSKY: I mean, he asked you to go, I
17 assume?

18 MR. RECAMIER: Yeah.

19 MR. LIDSKY: So, there was one, I think it
20 was M&T for, was it four million, or two
21 million? There was a couple that were pretty
22 big. That got denied.

23 MR. RECAMIER: I mean, that, I don't know.

24 MR. LIDSKY: So, one of them, like, one of
25 the tax forms had, like, Wite-Out and

LIMITED OFFICIAL USE

30

1 corrections.

2 MR. RECAMIER: Mm-hmm.

3 MR. LIDSKY: Was that things that -?

4 MR. RECAMIER: That's not me.

5 MR. LIDSKY: That doesn't sound like your
6 work?

7 MR. RECAMIER: No.

8 MR. LIDSKY: So, when you say he didn't
9 know what he was doing, like, is that kind of
10 an example? I don't have those, and for the
11 life of me, I can't find this Chase statement.
12 Let me see here. Ah, I got it. Okay. So, can
13 you see that?

14 MR. RECAMIER: Okay.

15 MR. LIDSKY: So, this statement, we have
16 seen this a couple of different times. The
17 name changes and the address changes.

18 MR. RECAMIER: Okay.

19 MR. LIDSKY: The account number can
20 change.

21 MR. RECAMIER: Mm-hmm.

22 MR. LIDSKY: But a lot of these
23 transactions, I know it is small.

24 MR. RECAMIER: Can I -?

25 MR. LIDSKY: Yes. Okay. But, like, like,

LIMITED OFFICIAL USE

31

1 these dollar amounts --

2 MR. RECAMIER: Uh-huh.

3 MR. LIDSKY: -- like, those are the same.

4 It's, like, you can - when you hold them side
5 by side by side - you can tell it's kind of the
6 same statement, just customized --

7 MR. RECAMIER: Mm-hmm.

8 MR. LIDSKY: -- for a company name. Was
9 this something you were doing, or he was doing?

10 MR. RECAMIER: No. That, he was doing.

11 MR. LIDSKY: This is his work?

12 MR. RECAMIER: Yeah.

13 MR. LIDSKY: Is this a real statement?
14 Because, like, some of these, there is a, like,
15 there is an app company in here, out in Great
16 Neck. Like, is he buying these statements?
17 Like, on a dark web, as well?

18 MR. RECAMIER: I think so.

19 MR. LIDSKY: So, this was, like, a real
20 statement, it's just kind of changed to make it
21 look like, you know, he is doing a million
22 dollars a month?

23 MR. RECAMIER: Mm-hmm.

24 MR. LIDSKY: Okay. So, we were
25 understanding that correctly. And you know

LIMITED OFFICIAL USE

32

1 that because you saw him do it, or you showed
2 him to do it, or -?

3 MR. RECAMIER: No, because then you --

4 MR. LIDSKY: It's not that I don't believe
5 you --

6 MR. RECAMIER: -- we talked about it.

7 MR. LIDSKY: -- but --

8 MR. RECAMIER: No. We just talked about
9 it.

10 MR. LIDSKY: -- okay. So, does he have
11 the actual, the real Chase statement, the one
12 that started this, and he just scans it in, and
13 -?

14 MR. RECAMIER: I don't think he has the
15 first one. But --

16 MR. LIDSKY: It's gone?

17 MR. RECAMIER: -- mm-hmm.

18 MR. LIDSKY: Do you know what software he
19 uses? He uses, like, Photoshop, or -?

20 MR. RECAMIER: Yeah.

21 MR. LIDSKY: Is that exactly what he uses?

22 MR. RECAMIER: Mm-hmm.

23 MR. LIDSKY: Does he do it on a Mac?

24 MR. RECAMIER: I mean, you would have to
25 ask him.

LIMITED OFFICIAL USE

33

1 MR. LIDSKY: Okay. But you said the Mac
2 is a computer that he uses. Do you ever use
3 it? Do you have the logins for it?

4 MR. RECAMIER: Yeah.

5 MR. LIDSKY: Okay. So, you, it's shared,
6 but do you each have a folder, or is it just
7 one account name?

8 MR. RECAMIER: Just one account.

9 MR. LIDSKY: Okay. So - okay - so, we
10 need some help, you know, knowing whose files
11 are whose. Is there one computer that is more
12 --

13 MR. RECAMIER: I know that five --

14 MR. LIDSKY: -- (Indiscernible *00:29:39).

15 MR. RECAMIER: -- I mean, like, I mean,
16 like, I access the computer to use Photoshop.
17 That's it.

18 MR. LIDSKY: You use for?

19 MR. RECAMIER: I use Photoshop on it a
20 couple times.

21 MR. LIDSKY: Oh, to shop.

22 MR. RECAMIER: Mm-hmm.

23 MR. LIDSKY: Oh, gotcha. So --

24 MR. RECAMIER: Yeah.

25 MR. LIDSKY: -- you are just using it for

LIMITED OFFICIAL USE

34

1 --

2 MR. RECAMIER: Photoshop.

3 MR. LIDSKY: -- oh, Photoshop. Photoshop.

4 MR. RECAMIER: Yeah.

5 MR. LIDSKY: Gotcha.

6 MR. RECAMIER: A couple times.

7 MR. LIDSKY: And that's for the --

8 MR. RECAMIER: Yes.

9 MR. LIDSKY: -- for the tax forms?

10 MR. RECAMIER: Yeah.

11 MR. LIDSKY: Gotcha. That makes sense.

12 MR. RECAMIER: Yeah.

13 MR. LIDSKY: It's so easy these days.

14 MR. RECAMIER: I mean, the tax form, you
15 download them on the, online.

16 MR. LIDSKY: Yeah.

17 MR. RECAMIER: But the IRS that causing it

18 --

19 MR. LIDSKY: Right.

20 MR. RECAMIER: -- I mean, the text for him
21 don't say no there online.

22 MR. LIDSKY: And you fill them in.

23 MR. RECAMIER: Yeah.

24 MR. LIDSKY: The tax ID numbers? Were
25 those just made up?

LIMITED OFFICIAL USE

35

1 MR. RECAMIER: Hmm. Like the EIN?

2 MR. LIDSKY: The EINs. Yeah.

3 MR. RECAMIER: Those are actually, I mean,
4 I mean, no, the EIN are good.

5 MR. LIDSKY: Really?

6 MR. RECAMIER: Yeah.

7 MR. LIDSKY: Like, but from somebody
8 else's -? I mean, you guys, you didn't get
9 them, or, you, he, or you? They're not real
10 for you.

11 MR. RECAMIER: Yeah.

12 MR. LIDSKY: Or are they?

13 MR. RECAMIER: No. They are the real EIN.

14 MR. LIDSKY: Huh. So, some of the, some
15 of the companies, like, maybe Appsensible.

16 MR. RECAMIER: Mm-hmm.

17 MR. LIDSKY: They show up in the state
18 registry, going back to 2014 or 2015.

19 MR. RECAMIER: Okay.

20 MR. LIDSKY: 2016.

21 MR. RECAMIER: Uh-huh.

22 MR. LIDSKY: How does that happen? Are
23 they real? Were they real LLCs filed with the
24 state?

25 MR. RECAMIER: Yeah.

LIMITED OFFICIAL USE

36

1 MR. LIDSKY: So, but seven years ago?

2 MR. RECAMIER: That has nothing to do with
3 this.

4 MR. LIDSKY: Oh, so, somebody else did it?

5 MR. RECAMIER: Uh-huh.

6 MR. LIDSKY: Oh. Okay. Because that's
7 why I couldn't square. I don't not understand
8 what --

9 MR. RECAMIER: Uh-huh.

10 MR. LIDSKY: -- you guys planned this
11 seven years back.

12 MR. RECAMIER: No.

13 MR. LIDSKY: You didn't even know each
14 other.

15 MR. RECAMIER: We didn't know each other.

16 MR. LIDSKY: This was another thing that
17 came up in our conversations. So, you spent
18 some time in Rikers.

19 MR. RECAMIER: Yeah.

20 MR. LIDSKY: On the other case that you
21 have in the city, and that's where you met --

22 MR. RECAMIER: Mm-hmm.

23 MR. LIDSKY: -- Mr. Ilori?

24 MR. RECAMIER: Yeah.

25 MR. LIDSKY: And I imagine you guys just

LIMITED OFFICIAL USE

37

1 became friends, and --

2 MR. RECAMIER: Yeah.

3 MR. LIDSKY: -- did he just want to keep
4 in touch after you got out, or did you have
5 common interests?

6 MR. RECAMIER: Well, we talked about a few
7 things. Yeah.

8 MR. LIDSKY: Okay. Yeah. No. I've seen
9 that before. I saw that in common. So, how do
10 you find existing companies?

11 MR. RECAMIER: I have no idea.

12 MR. LIDSKY: Is that what he -?

13 MR. RECAMIER: Yeah.

14 MR. LIDSKY: That's his role. Gotcha. I
15 asked you, there was -. We noticed, you
16 mentioned, do we have a red car? I forget how
17 you put it. But you didn't seem too surprised
18 to see us.

19 MR. RECAMIER: Mm-hmm.

20 MR. LIDSKY: And you asked about, do we
21 have a red car? So, we, you know, we know each
22 other. You know we were out there. We know
23 you know we were there. We know you saw us
24 from time to time. I did ask you - and again,
25 this is just for the record - you know, we saw,

LIMITED OFFICIAL USE

38

1 and you, and Mr. Ilori come out of the
2 apartment, and sprint up Perv Street (Phonetic
3 Sp. *00:32:52).

4 MR. RECAMIER: Mm-hmm.

5 MR. LIDSKY: The other day. And so, I
6 just asked you what was that about, and you
7 said, you said you guys were, you were late.
8 He was late.

9 MR. RECAMIER: Mm-hmm.

10 MR. LIDSKY: And you had something in his
11 car.

12 MR. RECAMIER: Yeah.

13 MR. LIDSKY: So, you were running after
14 him to get what you need out of his car, and he
15 was running to his car. So that, that makes
16 sense. We were just, you know, curious about
17 that. How long have you been doing this with
18 him? I mean, when did it start? You both got
19 out.

20 MR. RECAMIER: I think some time last
21 year.

22 MR. LIDSKY: Now, he was arrested and
23 charged last --

24 MR. RECAMIER: Yeah.

25 MR. LIDSKY: -- January, or March.

LIMITED OFFICIAL USE

39

1 MR. RECAMIER: Yeah. He was charged.

2 MR. LIDSKY: He was charged. You weren't.

3 MR. RECAMIER: No.

4 MR. LIDSKY: You, I mean, for, I mean, he
5 seems to be, you know, if - not to belittle
6 your position in the organization - but he is
7 the president and the CEO, and --

8 MR. RECAMIER: Mm-hmm.

9 MR. LIDSKY: -- you are the subordinate
10 employee. Is that a fair characterization?

11 MR. RECAMIER: Yeah. That is fine.

12 MR. LIDSKY: Is that how you see it?

13 MR. RECAMIER: Yeah. Yeah.

14 MR. LIDSKY: I mean, do we have that
15 assessed correctly, or --

16 MR. RECAMIER: Yes.

17 MR. LIDSKY: -- did you -? Okay. So, how
18 is it that he keeps - everything is leading
19 back to him?

20 MR. RECAMIER: What do you mean?

21 MR. LIDSKY: Well, I mean, he was
22 identified in the prior case, and charged. And
23 you weren't. But you, you know, one of the
24 names I mentioned to you when we met was
25 Christopher Millot (Phonetic Sp. *00:34:48).

LIMITED OFFICIAL USE

40

1 Or Donald Millot.

2 MR. JOHN: Donald.

3 MR. LIDSKY: Donald Millot.

4 (Indiscernible *00:34:52).

5 MR. RECAMIER: I mean, he had mentioned
6 that name, actually.

7 MR. LIDSKY: He did?

8 MR. RECAMIER: You didn't.

9 MR. LIDSKY: When we - I think I did, when
10 we were --

11 MR. RECAMIER: Nope.

12 MR. LIDSKY: -- (Indiscernible *00:34:59).
13 Donald Millot?

14 MR. RECAMIER: Nope.

15 MR. LIDSKY: I thought I did.

16 MR. RECAMIER: No, you didn't.

17 MR. LIDSKY: Christopher Potash (Phonetic
18 Sp. *00:35:03).

19 MR. RECAMIER: No, you didn't.

20 MR. LIDSKY: Not that one, either?

21 MR. RECAMIER: Nope.

22 MR. LIDSKY: Josh Hatura (Phonetic Sp.
23 *00:35:09)?

24 MR. RECAMIER: You did.

25 MR. JOHN: You recognize all those names,

LIMITED OFFICIAL USE

41

1 though, right?

2 MR. RECAMIER: Yeah.

3 MR. LIDSKY: David Dilly? (Phonetic Sp.
4 *00:35:16).

5 MR. RECAMIER: Mm-hmm.

6 MR. LIDSKY: Thomas Hackinberry. So, will
7 Donald Millot. So, if I didn't --

8 MR. RECAMIER: Mm-hmm.

9 MR. LIDSKY: -- mention it, it was an
10 oversight on my part but I will mention it now.
11 So, that was one from the previous iteration.

12 MR. RECAMIER: Yeah.

13 MR. LIDSKY: I mean, was it just all the
14 same? But how do you keep kind of avoiding
15 scrutiny, up until now of course, where he
16 keeps getting identified? I mean --

17 MR. RECAMIER: I mean, like, if you
18 (Indiscernible *00:35:49), like, you know how
19 it happened, and it's not exactly fair. I mean,
20 like, he was not doing anything wrong.

21 MR. LIDSKY: Mm-hmm.

22 MR. RECAMIER: And you guys came at him.
23 And offered him to commit crime. And then
24 arrest him. I mean, when I say you, like, it's
25 not --

LIMITED OFFICIAL USE

42

1 MR. LIDSKY: Yeah.

2 MR. RECAMIER: -- you.

3 MR. LIDSKY: Yeah, yeah.

4 MR. RECAMIER: Like, it's --

5 MR. LIDSKY: The same thing. And when I

6 say --

7 MR. RECAMIER: -- that.

8 MR. LIDSKY: -- you guys, you know -.

9 MR. RECAMIER: And frankly, it's not -.

10 That's really nasty.

11 MR. LIDSKY: Yeah. That wasn't our --

12 MR. RECAMIER: That's a (Indiscernible

13 *00:36:22). And actually, there are tapes.

14 And I heard the tapes. (Indiscernible

15 *00:36:27), like, if this guy doesn't want to

16 do it, and like, the guys that work with the

17 FBI, it's, like, we'll push it on him, like,

18 we're going to hurt him or something, and yeah,

19 yeah, I mean, like --

20 MR. LIDSKY: Oh.

21 MR. RECAMIER: -- it's -.

22 MR. LIDSKY: I'm not - admittedly, I've

23 read the criminal complaint on that - but I am

24 not that intimately familiar with the details.

25 MR. RECAMIER: It's not fair.

LIMITED OFFICIAL USE

43

1 MR. LIDSKY: I see what you are saying.

2 MR. RECAMIER: Yeah.

3 MR. LIDSKY: But anyway, you know, his --

4 MR. RECAMIER: (Indiscernible *00:37:00).

5 MR. LIDSKY: -- I know, you know, we
6 knocked on your door, and we, you know, you are
7 here with us, we are talking to you. His role
8 in this is not lost on us. It seems to be, you
9 know, basically the same type of activity.

10 Just redirected at the PPP loans. I realize --

11 MR. RECAMIER: Mm-hmm.

12 MR. LIDSKY: -- last year, when he was
13 arrested and charged, PPP loans didn't exist.

14 MR. RECAMIER: Yeah.

15 MR. LIDSKY: That was prior to the
16 pandemic, or just the beginning. I mean, the
17 PPP loans are admittedly pretty easy target. I
18 guess. Low hanging fruit. I mean, you know,
19 they were throwing money in the air. Can I ask
20 whose idea was it to target the PPP loans? Did
21 they just --? Was it just easy, appealing?

22 MR. RECAMIER: I am not sure, actually.

23 MR. LIDSKY: I'm just curious, like, if
24 somebody researched the program, got an
25 understanding --

LIMITED OFFICIAL USE

44

1 MR. RECAMIER: Nope.

2 MR. LIDSKY: -- of how it works. A number
3 of loans that I believe you guys, you and Mr.
4 Ilori, submitted, the applications that you
5 submitted were denied.

6 MR. RECAMIER: Mm-hmm.

7 MR. LIDSKY: Did you all learn --

8 MR. RECAMIER: Mm-hmm.

9 MR. LIDSKY: -- like, when it was denied?
10 Did you kind of learn from it, and try to do it
11 better on the next one, or was it just, let's
12 just try this, let's just try this, and --?

13 MR. RECAMIER: Well, we, I mean -. Yeah.
14 I think, like, I don't want to answer it.

15 MR. LIDSKY: Fair enough. Kerwin, do you
16 have any points of curiosity? If I could come
17 back to one more. In the car - I'm sorry - in
18 the car, circling back to the IDs and credit
19 cards. Yeah. There were no IDs. No credit
20 cards in the place --

21 MR. RECAMIER: Mm-hmm.

22 MR. LIDSKY: -- in any of the names that
23 we know of. I asked you, you know, do you know
24 if he keeps some, like, we have covered that.
25 I asked you if you know where he keeps them,

LIMITED OFFICIAL USE

45

1 and you thought he kept them in his car?

2 MR. RECAMIER: Yeah.

3 MR. LIDSKY: So, he always has them all
4 with him? Does he -. He doesn't leave them at
5 home. He doesn't want either, does he -?

6 MR. RECAMIER: I mean, I don't go to his
7 house. So --

8 MR. LIDSKY: You never --

9 MR. RECAMIER: -- I don't know.

10 MR. LIDSKY: -- do you know where he
11 lives?

12 MR. RECAMIER: Yeah. But have I been
13 inside, I mean, like --

14 MR. LIDSKY: Gotcha. Specifically.

15 MR. RECAMIER: -- met his wife, his kids.
16 So.

17 MR. LIDSKY: Oh. Okay. Yeah. So, like,
18 he took you there, just said, I'll be right
19 out, then he ran inside, or did he just, you
20 know where he lives, just generally?

21 MR. RECAMIER: I mean, I know the
22 (Indiscernible *00:39:54), like, but nothing.

23 MR. LIDSKY: Gotcha. So, he keeps all the
24 IDs and credit cards with him, all the time?
25 Just, he never knows when he might need one, or

LIMITED OFFICIAL USE

46

1 -?

2 MR. RECAMIER: I have -. You know, you
3 would have to ask him.

4 MR. LIDSKY: Ask him.

5 MR. RECAMIER: Yeah.

6 MR. LIDSKY: Okay.

7 MR. RECAMIER: Yeah.

8 MR. LIDSKY: Understood. I'm sorry.

9 That's all I wanted to --

10 MR. JOHN: That's fine.

11 MR. LIDSKY: -- circle back with.

12 MR. JOHN: How do you and him communicate?

13 MR. RECAMIER: What do you mean?

14 MR. JOHN: You and him talk. When you are
15 not together.

16 MR. LIDSKY: Did you want this one?

17 MR. RECAMIER: No.

18 MR. LIDSKY: Thank you.

19 MR. RECAMIER: Phone.

20 MR. JOHN: By phone?

21 MR. RECAMIER: Yeah.

22 MR. JOHN: And does he call you or do you
23 call him? Does he call you?

24 MR. RECAMIER: Well, we call each other.

25 MR. JOHN: You call each other. Okay.

LIMITED OFFICIAL USE

47

1 And do you call from your own phone, or phones
2 under he --

3 MR. RECAMIER: Yeah. From an app.

4 MR. JOHN: -- through an app?

5 MR. RECAMIER: Yeah.

6 MR. JOHN: Which app is that?

7 MR. RECAMIER: Telegram.

8 MR. JOHN: Telegram?

9 MR. RECAMIER: Uh-huh.

10 MR. JOHN: Okay.

11 MR. LIDSKY: So, what phone in particular?

12 We'll just start, the Jonathan Hertua (Phonetic
13 Sp. *00:41:02) --

14 MR. RECAMIER: Uh-huh.

15 MR. LIDSKY: -- ID seemed to kind of be
16 the main one.

17 MR. RECAMIER: Okay.

18 MR. LIDSKY: That you guys use. I don't
19 know.

20 MR. RECAMIER: Yeah.

21 MR. LIDSKY: I think that's just
22 subjective.

23 MR. RECAMIER: Yeah.

24 MR. LIDSKY: But so, there was a phone
25 assigned to that. Who has that phone? Is it

LIMITED OFFICIAL USE

48

1 in the pile that we found in the apartment? Or
2 does he carry that one around with him?

3 MR. RECAMIER: I don't know.

4 MR. LIDSKY: Oh, you don't know? Does he
5 --

6 MR. RECAMIER: (Indiscernible *00:41:27) I
7 think.

8 MR. LIDSKY: -- are all those phones his,
9 or -?

10 MR. RECAMIER: Yeah.

11 MR. LIDSKY: Do you, but you have access
12 to them?

13 MR. RECAMIER: Yeah.

14 MR. LIDSKY: So, shared?

15 MR. RECAMIER: Mm-hmm.

16 MR. LIDSKY: And they are just used for, I
17 would imagine, to answer questions like the
18 bank calls.

19 MR. RECAMIER: Yeah. (Indiscernible
20 *00:41:46).

21 MR. LIDSKY: So, for their - associated
22 with an application. Who decided on Telegram?

23 MR. RECAMIER: I have no idea.

24 MR. LIDSKY: So, the apartment was rented,
25 the 44 - when I say the apartment - 4441 Perv

LIMITED OFFICIAL USE

49

1 Street (Phonetic Sp. *00:42:14), Apartment
2 1805, where we met this evening.

3 MR. RECAMIER: Mm-hmm.

4 MR. LIDSKY: When was that rented?

5 MR. RECAMIER: I'm not sure. I think,
6 like, in May.

7 MR. LIDSKY: Yeah. He has a key.

8 MR. RECAMIER: Mm-hmm.

9 MR. LIDSKY: To the apartment. He has
10 some clothes stored in a closet in that
11 apartment?

12 MR. RECAMIER: Mm-hmm.

13 MR. LIDSKY: He has been in that apartment
14 before?

15 MR. RECAMIER: Mm-hmm.

16 MR. LIDSKY: Yeah. I realize it's, some
17 of these questions are fairly straightforward.
18 He was in that apartment today?

19 MR. RECAMIER: Yeah.

20 MR. LIDSKY: About how many times have you
21 seen him in that apartment?

22 MR. RECAMIER: I don't know.

23 MR. LIDSKY: A dozen? Hundreds?

24 MR. RECAMIER: I don't know.

25 MR. LIDSKY: You don't know. Okay. He

LIMITED OFFICIAL USE

50

1 uses all of the electronic devices in that
2 apartment?

3 MR. RECAMIER: I mean, you would have to
4 ask him.

5 MR. LIDSKY: Okay.

6 MR. RECAMIER: I don't know that.

7 MR. LIDSKY: Fair enough.

8 MR. RECAMIER: I mean, frankly, if you
9 have a question about, like, the night that
10 (Indiscernible *00:43:32) victim, that's fine.

11 MR. LIDSKY: Okay.

12 MR. RECAMIER: But I mean, I don't want to
13 talk about (Indiscernible *00:43:36).

14 MR. LIDSKY: Okay.

15 MR. RECAMIER: I mean, that's -.

16 MR. LIDSKY: Gotcha.

17 MR. JOHN: About - I'm sorry - about what?

18 MR. LIDSKY: Ilori.

19 MR. JOHN: Oh, okay.

20 MR. LIDSKY: Okay. Understood. That's
21 helpful. Yeah. Well, I mean, if -. I mean,
22 you mentioned the devices have the names of all
23 of the victims.

24 MR. RECAMIER: Yeah.

25 MR. LIDSKY: You know, there was some

LIMITED OFFICIAL USE

51

1 paperwork with a couple of names on them.

2 MR. RECAMIER: Mm-hmm.

3 MR. LIDSKY: That I admittedly said we
4 were unfamiliar with these. Yeah. If you are
5 able to help us, if there is a master list, or
6 a key, you said, on the devices, if you are
7 able to help us identify them, so we can notify
8 them, and, you know, help them with their
9 credit repair, that would certainly be, you
10 know, welcome news for us. Getting into the
11 devices, it would be an issue, potentially.
12 Are there passwords on the computers?

13 MR. RECAMIER: Yeah.

14 MR. LIDSKY: Do you know the passwords to
15 the computers?

16 MR. RECAMIER: Yes.

17 MR. LIDSKY: Are they encrypted?

18 MR. RECAMIER: Nope.

19 MR. LIDSKY: Okay. Are there passwords to
20 the phones?

21 MR. RECAMIER: Yes.

22 MR. LIDSKY: Do you know the passwords to
23 the phones?

24 MR. RECAMIER: Yes.

25 MR. LIDSKY: Would you be willing to share

LIMITED OFFICIAL USE

52

1 with us the passwords to the phones, for the
2 purpose of getting the victim information off,
3 so that we could start helping the victims?

4 MR. RECAMIER: I would want to think of
5 it, but yeah. I mean, why not?

6 MR. LIDSKY: Okay. Would you be willing
7 to write it down for us this evening?

8 MR. RECAMIER: Not this evening. No.

9 MR. LIDSKY: Okay.

10 MR. RECAMIER: I think, like, at this
11 point, like, I would want to think of it.

12 MR. LIDSKY: Okay.

13 MR. RECAMIER: A little bit more.

14 MR. LIDSKY: Okay. Not a problem. We
15 would certainly welcome the help in identifying
16 the victims. Without asking you a question,
17 you know, about Mr. Ilori, but one that kind of
18 involves you both. So, are you aware of all of
19 the identities that your likeness, your face,
20 was used on, or did he have your picture and
21 just make IDs that you were unaware of?

22 MR. RECAMIER: No. I don't think so.

23 MR. LIDSKY: Okay. So, you are aware of
24 all of the ones where your --

25 MR. RECAMIER: Yeah.

LIMITED OFFICIAL USE

53

1 MR. LIDSKY: -- okay. There is some where
2 your face looks a little different.

3 MR. RECAMIER: Okay.

4 MR. LIDSKY: Was it, like, stretched? Or
5 was that just -?

6 MR. RECAMIER: Like, which one?

7 MR. LIDSKY: Let me pull up -. This looks
8 like it. I want to say -. So, do you
9 recognize the name Christopher Potash?

10 MR. RECAMIER: Mm-hmm.

11 MR. LIDSKY: Potash. I thought that
12 picture was a bit different, but that was you?
13 I have to find that one. Forgive me for the
14 delay. While I'm looking for that, a separate
15 question. Do you know where all the money
16 went? So, this is another area, if you are
17 able to help us recover --

18 MR. RECAMIER: Mm-hmm.

19 MR. LIDSKY: -- some of the stolen money.

20 MR. RECAMIER: No. I don't.

21 MR. LIDSKY: He doesn't share that with
22 you?

23 MR. RECAMIER: Hmm-mm.

24 MR. LIDSKY: Does he control all of that?

25 MR. RECAMIER: Mm-hmm.

LIMITED OFFICIAL USE

54

1 MR. LIDSKY: Okay. And so - all right -
2 so, you don't have access to it, then. You
3 don't even know where it is?

4 MR. RECAMIER: Hmm-mm.

5 MR. LIDSKY: Does he --

6 MR. RECAMIER: Mm-hmm.

7 MR. LIDSKY: -- tell you, generally, about
8 --?

9 MR. RECAMIER: I mean, I think, like, he
10 had some money on the stuff (Indiscernible
11 *00:48:08), and --

12 MR. LIDSKY: Okay.

13 MR. RECAMIER: -- (Indiscernible
14 *00:48:10).

15 MR. LIDSKY: So, that's what I was getting
16 at. So --

17 MR. RECAMIER: Yeah.

18 MR. LIDSKY: -- but that is just a general
19 awareness?

20 MR. RECAMIER: Yeah.

21 MR. JOHN: Now, how long ago did you meet
22 Ilori?

23 MR. RECAMIER: I think in 2019.

24 MR. JOHN: '19? And again, you said you
25 met at Rikers, right?

LIMITED OFFICIAL USE

55

1 MR. RECAMIER: Mm-hmm.

2 MR. JOHN: Were you involved in anything
3 like this before?

4 MR. RECAMIER: No.

5 MR. JOHN: No?

6 MR. LIDSKY: How did you learn how to do
7 it? Were you, you know, coached, or just
8 learned by doing?

9 MR. RECAMIER: Well, I learned when I left
10 Rikers.

11 MR. LIDSKY: Oh, okay.

12 MR. JOHN: Is there anything you can tell
13 us about why, you know, I know, you know, you
14 were asked before about what's in this for you.
15 Is there anything you could tell us about what,
16 why do this? Why you are doing it?

17 MR. RECAMIER: Well, because I ended up,
18 like, in a bad situation.

19 MR. JOHN: A bad situation?

20 MR. RECAMIER: And I needed to make some
21 money, and --

22 MR. JOHN: Okay.

23 MR. RECAMIER: -- that's it.

24 MR. JOHN: So, you do get some money out
25 of this?

LIMITED OFFICIAL USE

56

1 MR. RECAMIER: Mm-hmm.

2 MR. JOHN: Okay. Do you care to tell us
3 how much?

4 MR. RECAMIER: Not that much. I mean,
5 like, just enough to cover the rent, and food,
6 and that's it.

7 MR. JOHN: Okay.

8 MR. RECAMIER: So.

9 MR. JOHN: Do you know, approximately, how
10 much? How much is the rent?

11 MR. RECAMIER: Like, \$3,000, or 38, 3100.

12 MR. JOHN: A month?

13 MR. RECAMIER: Yeah.

14 MR. JOHN: Okay.

15 MR. RECAMIER: (Indiscernible *00:49:52).

16 MR. LIDSKY: Do you pay that, or he pays
17 that?

18 MR. RECAMIER: He pays that.

19 MR. LIDSKY: How does he pay? A check?

20 MR. RECAMIER: Money order.

21 MR. JOHN: So, about how much do you spend
22 on food a month?

23 MR. RECAMIER: Maybe, like, a few hundred
24 a week.

25 MR. JOHN: Oh, okay.

LIMITED OFFICIAL USE

57

1 MR. LIDSKY: I'm sorry. I'm
2 (Indiscernible *00:50:21). Do you remember the
3 bank Potash was with? Was it Cross River?

4 MR. JOHN: And can you (Indiscernible
5 *00:50:32). I can't remember. I can't
6 remember.

7 MR. LIDSKY: Just a second. So, do you
8 recall opening or having some role in opening
9 an account at Coin Base? (Phonetic Sp.
10 *00:51:19).

11 MR. RECAMIER: No.

12 MR. LIDSKY: Do you know what coin this
13 is?

14 MR. RECAMIER: Mm-hmm.

15 MR. JOHN: Did you open up any kind of
16 cryptocurrency accounts?

17 MR. RECAMIER: No.

18 MR. JOHN: No?

19 MR. RECAMIER: I mean, I have one on my
20 phone, but I knew I used it.

21 MR. JOHN: Okay.

22 MR. RECAMIER: I have Conveys on my phone
23 (Indiscernible *00:51:52).

24 MR. LIDSKY: So, if there was an account
25 at Coin Base, with your picture --

LIMITED OFFICIAL USE

58

1 MR. RECAMIER: Mm-hmm.

2 MR. LIDSKY: -- somebody else did that?

3 MR. RECAMIER: Yup. Like, if I go to a
4 bank, like, to open an account, I need to be
5 there, but --

6 MR. LIDSKY: Right.

7 MR. RECAMIER: -- Conveys is still online.

8 MR. LIDSKY: Right.

9 MR. RECAMIER: It's different.

10 MR. LIDSKY: All right. Let's come back
11 to that in a second. I'm sorry. I'm still
12 looking through it. Getting closer, though.

13 MR. JOHN: Yeah. I can't remove it.
14 Gosh.

15 MR. LIDSKY: Yeah.

16 MR. JOHN: I don't remember.

17 MR. LIDSKY: It was -. Is it M2 gold
18 jets? Is that familiar to you?

19 MR. RECAMIER: Yeah.

20 MR. LIDSKY: How do you know -?

21 MR. JOHN: I found it.

22 MR. LIDSKY: How do you know M2 gold jets?

23 MR. JOHN: Two gold jets.

24 MR. RECAMIER: Man, you know why.

25 MR. LIDSKY: I know. But is it because of

LIMITED OFFICIAL USE

59

1 a PPP loan account?

2 MR. RECAMIER: Because I have been there.

3 I have accounts over there. That's not me.

4 MR. LIDSKY: But do you have a Christopher
5 Potash identification that you are aware of?

6 Do you know the name Christopher Potash?

7 MR. RECAMIER: Yeah. We have an email.
8 That's not me. That's not my picture.

9 MR. LIDSKY: Okay. This is one that I
10 thought was questionable. So, do you see all
11 of the licenses?

12 MR. RECAMIER: This was my picture. Yeah.
13 I think so.

14 MR. LIDSKY: Mm-hmm. Do you know who this
15 person is?

16 MR. RECAMIER: Never met him.

17 MR. LIDSKY: So, there is a license with
18 your picture, with a Christopher Potash name,
19 but this isn't it?

20 MR. RECAMIER: I know that is a picture of
21 me on his sanity, but that's not my picture.

22 MR. LIDSKY: How would you have, or he
23 did, well, you would have needed it, right, to
24 open the account?

25 MR. RECAMIER: Mm-hmm.

LIMITED OFFICIAL USE

60

1 MR. LIDSKY: On M2 gold jets.

2 MR. RECAMIER: There is no bank account
3 with Christopher Potash.

4 MR. LIDSKY: It was just the loan?

5 MR. RECAMIER: Okay.

6 MR. LIDSKY: I was asking. Was it just
7 the loan?

8 MR. RECAMIER: I don't even know if there
9 was a loan with his name.

10 MR. LIDSKY: Okay. But you know the name.
11 It's just not one that you -?

12 MR. RECAMIER: I know the name because you
13 found an email address for him.

14 MR. LIDSKY: Ah.

15 MR. RECAMIER: And that's it.

16 MR. LIDSKY: Okay.

17 MR. RECAMIER: And it was an email address
18 with his name, the email address with his name.

19 MR. LIDSKY: So, if an account was opened
20 at Coin Base. So, I guess, I realize, you
21 know, answer this or don't answer this, so, if
22 he has the licenses --

23 MR. RECAMIER: Mm-hmm.

24 MR. LIDSKY: -- so, this license, the John
25 Hertua license, are you familiar with that?

LIMITED OFFICIAL USE

61

1 MR. RECAMIER: Yeah.

2 MR. LIDSKY: And there is a John Hertua
3 license with your picture --

4 MR. RECAMIER: Mm-hmm.

5 MR. LIDSKY: -- on it. So, if he has
6 that, and does he have pictures of you? Does
7 Ilori have just pictures of you, you know,
8 regular kind of pictures?

9 MR. RECAMIER: I mean, I guess. Yeah. I
10 need to think of that.

11 MR. LIDSKY: I mean, would he have been
12 able to take, you know, between the ID and a
13 picture of you --

14 MR. RECAMIER: I mean --

15 MR. LIDSKY: -- could he have opened an
16 account with your likeness, and John Hertua's
17 name, at Coin Base, without your knowledge?

18 MR. RECAMIER: Yes.

19 MR. LIDSKY: Was he in a position to do
20 that?

21 MR. RECAMIER: Yeah. He would. Yeah.
22 This picture the face is different from me.

23 MR. LIDSKY: Yeah. But do you know if he
24 has done from time to time, in the past?
25 (Indiscernible *00:56:20).

LIMITED OFFICIAL USE

62

1 MR. RECAMIER: Well, I know he has a new
2 account with Coin Base. I don't know under
3 which name.

4 MR. LIDSKY: Okay.

5 MR. RECAMIER: Yeah.

6 MR. LIDSKY: Okay. So, if he used your
7 picture, it was not with your knowledge or
8 permission.

9 MR. RECAMIER: No.

10 MR. LIDSKY: Do you do this with anybody
11 else?

12 MR. RECAMIER: No.

13 MR. LIDSKY: So, if this took place, he is
14 the only one that could have done it?

15 MR. RECAMIER: Mm-hmm.

16 MR. LIDSKY: Okay. That's interesting.
17 That's helpful. Do you recognize this picture?

18 MR. RECAMIER: Yeah. That's me.

19 MR. LIDSKY: Yeah. Do you remember why
20 you took that?

21 MR. RECAMIER: Yeah.

22 MR. LIDSKY: Here, take it. What, is that
23 a selfie, or -?

24 MR. RECAMIER: I have no idea.

25 MR. LIDSKY: It looks like it's a bakery

LIMITED OFFICIAL USE

63

1 or something. And it says cake over here.

2 MR. RECAMIER: I'll tell it ways is.

3 MR. LIDSKY: Okay. Yeah. Would it be -.
4 Okay. No. That's helpful. Interesting.
5 Well, I'm surprised. But (Indiscernible
6 *00:58:05). Rental cars.

7 MR. RECAMIER: Mm-hmm.

8 MR. LIDSKY: I think you and he rented
9 cars fairly frequently. This is another thing
10 we touched on briefly.

11 MR. RECAMIER: Uh-huh.

12 MR. LIDSKY: At the apartment. Recently.
13 We saw you both in a white Jeep Grand Cherokee,
14 with Maryland plates, and tinted windows. You
15 said the tint was already on there. We thought
16 maybe you tinted it after the fact. You, you
17 and he, you guys. Not personally, necessarily.
18 But you said it was like that when you got the
19 vehicle. Was your recollection. Was that
20 correct?

21 MR. RECAMIER: Uh.

22 MR. LIDSKY: Do I remember that correctly,
23 or is that -?

24 MR. RECAMIER: I mean, that has nothing to
25 do with the big tams like you were talking

LIMITED OFFICIAL USE

64

1 about.

2 MR. LIDSKY: No. I agree. But the cars
3 were rented. They're the same - some of the
4 same driver's licenses.

5 MR. RECAMIER: Mm-hmm.

6 MR. LIDSKY: Whose idea -? I mean, it was
7 just, let's use rental cars? Was that his
8 idea, or I don't know if that's asking close to
9 him?

10 MR. RECAMIER: Yeah.

11 MR. LIDSKY: That's fine. But the - some
12 of the same driver's licenses and the same
13 credit cards --

14 MR. RECAMIER: Mm-hmm.

15 MR. LIDSKY: -- tied to the accounts, with
16 the victims, were used to rent the cars.

17 MR. RECAMIER: Yes.

18 MR. LIDSKY: A number with Enterprise.
19 Avis.

20 MR. RECAMIER: Mm-hmm.

21 MR. LIDSKY: Most recently, the Jeep with
22 Avis that they repossessed. But you said he
23 had told you he returned it. Well, I mean,
24 again, we are certainly interested in learning
25 more about all of the things, that we have a

LIMITED OFFICIAL USE

65

1 long list. We certainly want to start
2 notifying them and helping them get back on
3 their feet, and we would like your ongoing help
4 with that. I think it is an area we can agree
5 that would be the right thing to do, and we
6 can, we can all help in that regard. You can
7 help us, and we can help them.

8 MR. RECAMIER: Okay.

9 MR. LIDSKY: Okay. So - okay - so, Coin
10 Base, and any stock accounts that wasn't yours?

11 MR. RECAMIER: Yeah.

12 MR. LIDSKY: Okay. Okay. I'm sorry. It
13 sounded like you had --

14 MR. JOHN: No, well --

15 MR. LIDSKY: -- a question.

16 MR. JOHN: -- it is a couple of questions.
17 That's a little different than where we are at
18 now. Do you know anything or much about
19 Ilori's current case that's pending?

20 MR. RECAMIER: I know the rough line.
21 Yeah.

22 MR. JOHN: You know, sorry, what?

23 MR. RECAMIER: Some of it.

24 MR. JOHN: Some of it. Okay. Do you know
25 where things stand right now, as far as his

LIMITED OFFICIAL USE

66

1 case, and what, where things are going, in the
2 future?

3 MR. RECAMIER: Well, I believe he is
4 waiting for a sentencing.

5 MR. JOHN: A sentencing. Do you know
6 approximately when that may be?

7 MR. RECAMIER: You would have to ask him.

8 MR. JOHN: Okay. But - okay - but do you
9 know? You don't have to tell me, but do you
10 know when that might be?

11 MR. RECAMIER: You would have to ask him.
12 That's not for me to answer.

13 MR. JOHN: Yeah, yeah. I don't want to
14 know. I don't want you to answer me, but I
15 just want to know if you know what it is. Do
16 you know -?

17 MR. RECAMIER: I don't understand what you
18 mean.

19 MR. JOHN: Oh, okay. No. I don't want
20 you to answer it. I just want you to let me -.
21 All right. Let's move on.

22 MR. RECAMIER: Okay. Thank you.

23 MR. JOHN: So, when the sentencing
24 eventually comes -.

25 (Whereupon, the above-entitled matter went

LIMITED OFFICIAL USE

67

1 off the record and back on the record).

2 MR. JOHN: Do you have any plans as to what
3 you are going to do afterwards? Because you
4 mentioned before, he pays the rent.

5 MR. RECAMIER: Uh-huh.

6 MR. JOHN: For you. Part of the reason why
7 you do this is to, you know, get a little help,
8 financially. Right? With food, with the rent,
9 so on and so forth. When the sentencing arise,
10 whatever eventually happens with that, what are
11 your plans to do afterwards?

12 MR. RECAMIER: Well, the plan was to make
13 enough money to stop.

14 MR. JOHN: Make enough to stop.

15 MR. RECAMIER: So, that was the plan.

16 MR. JOHN: Okay.

17 MR. RECAMIER: All right.

18 MR. LIDSKY: So, I'm guessing, you know,
19 even though, you know, eventually, it will
20 stop, between --

21 MR. RECAMIER: Uh-huh.

22 MR. LIDSKY: -- his court date, and --

23 MR. RECAMIER: Yeah.

24 MR. LIDSKY: -- you know, must make enough
25 money, are there any outstanding now? Is there

LIMITED OFFICIAL USE

68

1 an opportunity for you to help us prevent money
2 from being diverted to a stolen account,
3 basically? Which would help us, essentially,
4 recover money. Is there any -? You guys seem
5 pretty active recently.

6 MR. RECAMIER: Mm-hmm.

7 MR. LIDSKY: Can you give us some insight
8 into what you were working on?

9 MR. RECAMIER: Just SBA.

10 MR. LIDSKY: Just -?

11 MR. RECAMIER: SBA.

12 MR. LIDSKY: Still more?

13 MR. RECAMIER: Yeah.

14 MR. LIDSKY: Didn't they stop it?

15 MR. RECAMIER: They would take some
16 things, like, they were working on. Like, it
17 is not finished yet.

18 MR. LIDSKY: Okay. Well, it is still
19 going on? Like, Idol is still going on?

20 MR. RECAMIER: Yeah.

21 MR. LIDSKY: Okay. So, the PPP --

22 MR. RECAMIER: Uh-huh.

23 MR. LIDSKY: -- has stopped --

24 MR. RECAMIER: The PPP.

25 MR. LIDSKY: -- but Idol --

LIMITED OFFICIAL USE

69

1 MR. RECAMIER: Yeah.

2 MR. LIDSKY: -- has continued. All right.

3 That makes sense.

4 MR. RECAMIER: Yeah, yeah.

5 MR. LIDSKY: So, it's just more of the
6 same?

7 MR. RECAMIER: Yeah.

8 MR. LIDSKY: Are there any outstanding?
9 Like, is there money coming in now? Is there
10 something we could stop, and sort of, you know,
11 get some credit in your corner for preventing a
12 loss?

13 MR. RECAMIER: I mean, you would have to
14 change the computer again. And the email.

15 MR. LIDSKY: Okay. Okay.

16 MR. RECAMIER: And I don't believe
17 anything has been approved.

18 MR. LIDSKY: But there are outstanding
19 ones. Do you know which banks?

20 MR. RECAMIER: No.

21 MR. LIDSKY: Have, or is that actually
22 directly through SBA?

23 MR. RECAMIER: That's directly with SBA.

24 MR. LIDSKY: Okay. Do you submit those?

25 MR. RECAMIER: Hmm-mm.

LIMITED OFFICIAL USE

70

1 MR. LIDSKY: By that answer, he submits
2 this?

3 MR. RECAMIER: Somebody else does.

4 MR. LIDSKY: Somebody else.

5 MR. RECAMIER: Yeah.

6 MR. LIDSKY: Okay.

7 MR. RECAMIER: Yeah.

8 MR. LIDSKY: Somebody else does. Do all
9 of those emails - because for, correct me if
10 I'm wrong, but each identity gets its own
11 unique email, that --

12 MR. RECAMIER: Mm-hmm.

13 MR. LIDSKY: -- you know, they all seem to
14 be a combination of the name, you know, and a
15 number at Gmail.

16 MR. RECAMIER: Mm-hmm.

17 MR. LIDSKY: Right. Do all of those
18 forward to one address, or do you check that
19 many different email addresses?

20 MR. RECAMIER: No. They don't converge.

21 MR. LIDSKY: They don't converge. Okay.
22 So, this is what you guys do all day. This is
23 why --

24 MR. RECAMIER: Yeah.

25 MR. LIDSKY: -- I mean, (Indiscernible

LIMITED OFFICIAL USE

71

1 *00:03:16).

2 MR. RECAMIER: (Indiscernible *00:03:17)
3 there's not that many. So.

4 MR. LIDSKY: Gotcha.

5 MR. JOHN: So, who does what? Who does
6 what? So, you opened the accounts?

7 MR. RECAMIER: Mm-hmm.

8 MR. LIDSKY: For the banks. You do the,
9 you do the tax documents for the loans, right?

10 MR. RECAMIER: Mm-hmm.

11 MR. JOHN: What else do you handle?

12 MR. RECAMIER: That's it.

13 MR. JOHN: That's it?

14 MR. RECAMIER: Yeah.

15 MR. JOHN: Who gets the ID?

16 MR. RECAMIER: I don't.

17 MR. JOHN: You don't. All right. Well,
18 what about the phones?

19 MR. RECAMIER: I don't.

20 MR. JOHN: And the email accounts?

21 MR. RECAMIER: Sometimes, I open some
22 email accounts.

23 MR. JOHN: Sometimes some email accounts,
24 you open. All right.

25 MR. LIDSKY: How do you know which ones to

LIMITED OFFICIAL USE

72

1 open? Do you -?

2 MR. RECAMIER: Somebody else --

3 MR. LIDSKY: Somebody else --

4 MR. RECAMIER: -- tells me.

5 MR. LIDSKY: -- okay. Somebody else tells
6 you. I'm sorry for this.

7 MR. JOHN: No. That's - go ahead -
8 that's, yeah, that's all I have.

9 MR. LIDSKY: How many -? Yeah. How many
10 phones total are out there?

11 MR. RECAMIER: Not that many. Again, most
12 of them were in my apartment.

13 MR. LIDSKY: Okay. Are those phones all
14 still active, and used on a -?

15 MR. RECAMIER: No.

16 MR. LIDSKY: Are those all done? They are
17 already closed out?

18 MR. RECAMIER: Yeah.

19 MR. LIDSKY: Okay. But they still have
20 some helpful information about the victims on
21 them?

22 MR. RECAMIER: Yeah. And then, because it
23 work with WiFi, and the apps.

24 MR. LIDSKY: Oh.

25 MR. RECAMIER: So.

LIMITED OFFICIAL USE

73

1 MR. LIDSKY: Right. One of the other
2 things, just, you know, it's late, you've been
3 super helpful, and we certainly appreciate your
4 patience with the process and indulging us.
5 One of the other things I mentioned to you, at
6 the apartment, just to reiterate it. You know
7 numbers. I assume you know his number. If you
8 do, you do. If you don't, you don't. But, you
9 know, you will have an opportunity, obviously,
10 to make some calls. I both, you know, urge you
11 and advise you, please do not contact him.
12 This is obviously an ongoing investigation.
13 You have your piece of it. He has his. Or
14 others have theirs. Please don't. If you do,
15 we will find out, you could be in - and I know
16 you said you acknowledge this, and you have no
17 plans to do so - but you could be charged with
18 obstruction. There is no good that could come
19 out of it.

20 MR. RECAMIER: No. It was (Indiscernible
21 *00:06:04).

22 MR. LIDSKY: Okay. I was just, I just
23 throw it out as a reminder.

24 MR. RECAMIER: Mm-hmm.

25 MR. LIDSKY: It would be, it would set you

LIMITED OFFICIAL USE

74

1 back.

2 MR. RECAMIER: Yeah.

3 MR. LIDSKY: At this point. There is no
4 need. So, I appreciate your candor in that. I
5 appreciate, you know, you have been, you know,
6 pleasant. I appreciate you understanding this
7 is professional. You know, you have been a
8 gentleman. I sat, also at the apartment, that
9 if you continue to act like a gentleman, we
10 will treat you like a gentleman. You know, we
11 cuffed you in the front, or for your comfort,
12 because of that, you are, I mean, you have been
13 nothing but, you know, cooperative, and we
14 appreciate that. And of course, the cuffs are
15 off now. We did give you a bottle of water.

16 MR. RECAMIER: Thank you.

17 MR. LIDSKY: Of course.

18 MR. JOHN: Mm-hmm.

19 MR. LIDSKY: We did give you a bottle of
20 water. We have to make sure that we report
21 anything we give you, we didn't give you that
22 in order for you to talk to us. It's just been
23 a long day, and --

24 MR. RECAMIER: Mm-hmm.

25 MR. LIDSKY: -- you were thirsty, too.

LIMITED OFFICIAL USE

75

1 So, unless Kerwin has got any more questions --

2 MR. JOHN: No.

3 MR. LIDSKY: -- let's find out - I know
4 this has been quite a night for you - we will
5 find out what the best course is for the
6 remainder of the evening.

7 MR. RECAMIER: Mm-hmm.

8 MR. LIDSKY: And then, in the car, we
9 discussed, too, what the process is tomorrow
10 morning. You will have your initial appearance
11 before a federal magistrate judge. You will
12 meet with pre-trial services. They will ask
13 you a number of questions. We also, too,
14 discussed you are not sick, you are not feeling
15 symptomatic. You have been vaccinated. In
16 fact --

17 MR. RECAMIER: Mm-hmm.

18 MR. LIDSKY: -- we found, in your pocket
19 was your vaccination card.

20 MR. RECAMIER: Yeah.

21 MR. LIDSKY: And your true name. So, you
22 know, good on you for that. We are also
23 vaccinated, I will say. I don't speak for
24 other people in that regard. So, that's it.
25 So, let us find out what the next step is for

LIMITED OFFICIAL USE

76

1 this evening.

2 MR. RECAMIER: Okay.

3 MR. LIDSKY: I know it's late. I thank
4 you for your patience. And we will, we will,
5 we will get moving.

6 MR. RECAMIER: Okay.

7 MR. JOHN: Okay.

8 MR. LIDSKY: All right. I don't know how
9 we turn things off.

10 MR. JOHN: All right. Well, the time now
11 is approximately 2:20.

12 MR. LIDSKY: I guess --

13 MR. JOHN: Oh.

14 MR. LIDSKY: -- just for that, you know,
15 we have been asking you a lot of questions.
16 You have certainly been patient, and indulged
17 us with answers. Do you have any questions of
18 us? Is there anything we can help clarify? Is
19 there more to this that --

20 MR. RECAMIER: No.

21 MR. LIDSKY: -- we should know about, that
22 might help us frame it in a way --

23 MR. RECAMIER: No.

24 MR. LIDSKY: -- more accurately?

25 MR. RECAMIER: No. I mean, when --

LIMITED OFFICIAL USE

77

1 MR. LIDSKY: Okay.

2 MR. RECAMIER: -- when you came to my
3 unit, we didn't, you know, pretty simple.

4 MR. LIDSKY: Yeah. Yeah. It is.

5 MR. RECAMIER: I mean, it is not brain
6 surgery. It's, like, okay.

7 MR. LIDSKY: No.

8 MR. RECAMIER: I mean -.

9 MR. LIDSKY: You guys were pretty good.

10 MR. RECAMIER: Well, not good enough.

11 MR. LIDSKY: Not good enough. You know,
12 we had a heck of a time, you know, finding you,
13 and figuring out who you were.

14 MR. RECAMIER: Mm-hmm.

15 MR. LIDSKY: You know, it's to your
16 credit. But yeah, you are right. And then,
17 you know, I think one of the other things, too,
18 we mentioned, you know, you knew this day was
19 probably coming. It was a bit of an
20 inevitability. So, yeah. It is pretty
21 straightforward. Okay. With that, I will let
22 Kerwin officially adjourn us.

23 MR. JOHN: The time now is approximately
24 2:21 a.m. And we are concluding this
25 interview.

26

LIMITED OFFICIAL USE

78

1

CERTIFICATE

2

I hereby certify that the foregoing pages

3

represent an accurate transcript of the

4

electronic sound recording of the proceedings

5

before the Department of Justice, Office of the

6

Inspector General in the matter of:

7

8

Interview of CHRIS RECAMIER

9

10

A handwritten signature in cursive script, reading "Brianna Rose Burton", is written over a horizontal line.

11

12

Brianna Rose Burton, Transcriber

13

14

15

16

17

18

19

20

21

22

23

24

25