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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,) CRIMINAL ACTION FILE
v.) NO. 1:22-CR-00171-MLB
) VOLUME 3
CARL DELANO TORJAGBO)
also known as)
KARL LUCIUS DELANO,)
)
Defendant.)
_____)

BEFORE THE HONORABLE MICHAEL L. BROWN
TRANSCRIPT OF PROCEEDINGS
JULY 23, 2025

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA

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5 For the Defendant: LAW OFFICE OF L. BURTON FINLAYSON
6 (By: L. Burton Finlayson)

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P R O C E E D I N G S

(Atlanta, Fulton County, Georgia, July 23, 2025, in open court.)

THE COURT: All right. Everybody's here, ready to go. I heard from the Court security officer that the young woman who starts her new job on Monday, the nurse, is worried, okay, about her ability to start the job.

Nothing we need to decide right now. You-all take all the time that you want to try this case the way you want to. But just keep in mind that that may be something that we have to talk about sometime tomorrow or whenever.

Okay?

If you want to keep her and inconvenience her, I don't mean that like it would be -- it's her job to be here right now. So if we want to keep her, we keep her. If we don't, we decide what to do, but I'll leave that to you-all. Just be thinking about what your position might be.

Okay?

I also did some research overnight. I don't think that -- I think the government can include the parts with unanswered questions. I think that he did not invoke, and I don't think there's a partial invocation. We can talk more about it at a break.

1 But I think that he is told that he has the right not
2 to speak, but that if he does, it can be used against him. He
3 continues to talk. And I don't think that a statement of I
4 don't want to answer that particular question but I'll answer
5 these other ones is an invocation of a right such that there's
6 some violation there.

7 Okay?

8 We left that sort of up in the air a little bit
9 yesterday. I know the government might have already decided
10 what they wanted to do, but I wanted to mention that at my
11 first opportunity.

12 Okay?

13 All right. Let's bring them in.

14 COURTROOM SECURITY OFFICER: Yes, sir.

15 THE COURT: Have you got a witness?

16 MS. CONNORS: Yes.

17 THE COURT: Okay. You don't have to call them until
18 they get in, but I just wanted to make sure that they were
19 ready and close.

20 MS. CONNORS: Your Honor, I think we did have one
21 quick issue.

22 THE COURT: Oh, hold on, sir.

23 Yes.

24 MR. EVERT: So, Your Honor, we had filed a
25 motion in limine to exclude blaming the victim evidence and

1 suggestions that the victims in this case were somehow at
2 fault. That -- I understood from the pretrial conference that
3 that was unopposed.

4 THE COURT: I did, too. Wasn't it?

5 MR. FINLAYSON: It was.

6 THE COURT: Okay.

7 MR. EVERT: And so I thought that was a pretty clear
8 line. And I think the opening statement came dangerously
9 close to that line, if not already crossing it with -- with
10 the argument that, look, I gave these documents to the bank, I
11 gave these documents to the IRS, they gave me the money.

12 I mean, I think that's -- that's shifting the blame
13 for the fact that the money was given to him from the
14 defendant to the victims, so I -- you know, I think what
15 happened in the opening was probably improper, but I just want
16 to be really sure that we're not going to get anywhere close
17 to that line going forward.

18 THE COURT: Why would you think that? I think he's
19 got a theory of it was open and notorious.

20 MR. EVERT: Right. But I don't think that --

21 THE COURT: And that's his theme.

22 MR. EVERT: Right.

23 THE COURT: I'm saying I wouldn't have too much
24 confidence -- if you think open and notorious is something
25 like that, which I think it touches on that notion, then I

1 think it is naive to think he's not going to get into that.

2 MR. EVERT: Yes. So I guess I would say I believe
3 that line has been crossed and I believe that it has been
4 crossed improperly. And I just would ask that he not be able
5 to continue down that road of essentially shifting the blame
6 for his obvious fraud from himself to -- to the victims of his
7 fraud.

8 MR. FINLAYSON: And I understand their argument. I
9 understand the point. But it's not shifting blame, it goes to
10 the issue of materiality, because the government has
11 alleged --

12 THE COURT: You can argue it materiality, right?

13 MR. FINLAYSON: Correct.

14 THE COURT: You need to tie it to what you're saying.
15 You need to tie it to that idea.

16 Okay?

17 MR. FINLAYSON: Okay.

18 THE COURT: You can't just say it because it goes to
19 something and then not argue it in the light of that. That's
20 like saying we're putting some 404(b) in there to show it's --
21 that it's not an accident. And then you just put it in there
22 and you just talk about that thing and you don't say how it
23 can be used, right? It's just --

24 MR. FINLAYSON: And I will -- I will tie that
25 together. I think it's an argument issue. But in terms of

1 examining a witness, I do think the government is being -- is
2 allowed to present this document that they submit is
3 fraudulent and they said that it had these 493 names and these
4 names are fake. And this is a material -- this was a
5 material -- I assume --

6 I don't know what the witness is going to say on
7 direct. But I assume the witness is going to say this was
8 material to our decision to loan the money. And if we had
9 known that these were all fake, then we wouldn't have loaned
10 the money, which makes it a material --

11 THE COURT: Is the guy going to say that?

12 MR. EVERT: I think that's essentially part of what
13 she's going to say.

14 THE COURT: All right.

15 MR. EVERT: And I think my concern is --

16 THE COURT: Well, hold on. Hold on. Let him finish.

17 MR. EVERT: Okay.

18 MR. FINLAYSON: And I just think that once they get
19 to lay that out there, I get to cross-examine on the
20 credibility and the believability of how material it was. And
21 that's -- I'm not trying to shift the blame.

22 But I think I'm entitled to go into what was
23 presented to the bank, what they actually relied upon, and
24 whether or not it was material.

25 MR. EVERT: I think that's essentially saying we're

1 going to say -- you know, if she testifies, you know, we got
2 this list, the fact that this list was provided was -- we
3 wouldn't have given -- if we had known that the information in
4 this list was false, we would not have issued the loan. And
5 then if he's going to say, well, look at all the information
6 in this list, like, I mean, I think the --

7 THE COURT: Like what? Follow that out. Like she's
8 going to say --

9 MR. EVERT: Yeah.

10 THE COURT: And then he's going to say if they would
11 have just looked, they would have seen John Snow.

12 MR. EVERT: Right. If they would have just looked,
13 they would have seen Oliver Twist. If they had just looked,
14 they would have seen Keanu Reeves. And so I --

15 THE COURT: Are you going to say that --

16 MR. FINLAYSON: I'm going to say --

17 THE COURT: Hold on. Hold on. You can't interrupt
18 me.

19 MR. FINLAYSON: I'm sorry.

20 THE COURT: -- shame on them for not looking?
21 Because if they would, they would have seen John Snow,
22 Oliver Twist and Charlie Brown, so it can't really be
23 material, because they never look at it.

24 MR. FINLAYSON: I think for argument, for closing, I
25 think it is that there was nothing material -- it was not a

1 material falsehood. And that because -- and we know it wasn't
2 material, because they -- they had the documents, they -- they
3 could and should have relied upon it. But -- so it doesn't --
4 it wasn't like he misled them. It was all right there. So I
5 don't -- I'm not trying to --

6 THE COURT: What do you mean, it wasn't like he
7 misled them?

8 He said John Snow worked for them. He said
9 Charlie Brown worked for them. You're just saying that it was
10 just such a stupid lie, that they would have caught it.
11 Amongst the 493, they should seen the seven obviously
12 fraudulent lies and shame on them for not. Right? How can
13 you say it's not a lie.

14 Did John Snow work for him?

15 MR. FINLAYSON: Someone by that name could have
16 worked there.

17 THE COURT: Okay. Well, that's fine. You can make
18 that argument.

19 MR. FINLAYSON: And I think -- and there may be --

20 THE COURT: It would be a funny cast of characters.

21 MR. FINLAYSON: Yes, it would. But I still think if
22 they're relying -- if they're putting in the document, which
23 they've already put in, and they're going to present it to the
24 woman -- to the woman from the bank, and she's going to say,
25 you know, we relied on this and this is, in part, why we made

1 this loan and it was materially false, I think I get to -- I
2 get to ask about, you know, what was false about it.

3 And, you know, if you had seen it, you know, I mean,
4 you saw it. I don't think it's an improper cross. I'm not
5 trying to blame them. I just think I'm entitled to go into
6 what they had, what they considered and how it was material to
7 their loan process.

8 THE COURT: Yes. I think you can do all of that.
9 What you cannot do is blame the victim. You've already agreed
10 that you can't say that the victim is so -- it's their fault,
11 shame on them, it's their fault.

12 I mean, if you just look at the document itself I
13 acknowledge that the lender will confirm the eligible loan
14 amount using the required documents submitted. I understand
15 and acknowledge and agree that the lender can share my tax
16 information.

17 I mean, I don't know that this is really much of an
18 issue. Isn't he told in the -- this is from the application,
19 isn't he acknowledging that the stuff he gives is material?
20 Isn't he?

21 MR. FINLAYSON: I don't know that that meets the
22 element for proof in a trial. I don't know that --

23 THE COURT: I acknowledge that the lender will
24 confirm the eligible loan amount using the required documents
25 submitted.

1 MR. FINLAYSON: I guess -- I haven't really thought
2 that through before. I don't know that -- I mean, that's --
3 that seems like that's an element they have to prove and maybe
4 that's part of their proof. I guess maybe there's a question
5 of -- I just haven't thought it through like that. It almost
6 seems like -- it seems that that almost removes the element
7 from the jury consideration.

8 THE COURT: No, of course not. Of course not. It's
9 an acknowledgment by him at the time of what he is told they
10 will consider. You can still argue it's not material. But, I
11 mean, I think in the light of that, is there really an
12 argument -- I'd like to know what your argument of blaming --
13 of saying it's not material in the light of that.

14 MR. FINLAYSON: I think it really depends on what the
15 witness says. I mean, just because I think there is that
16 document that the defendant allegedly signed, I don't think
17 that changes the -- I assume the bank officer's testimony is
18 going to be that we relied on these documents. And I don't
19 think that removes them of that piece of the case. I think
20 they still have to prove that, so I don't -- I don't think
21 that ends the question.

22 THE COURT: He asserts it in good faith that the
23 funds will be used to retain workers and maintain payroll and
24 some other things. And if it's used for unauthorized
25 purposes, the government will hold him legally liable for such

1 charges of fraud.

2 At any rate, I think we all agree where at least one
3 bright line is, which is that you cannot blame the victim for
4 falling for the fraud. You can attack materiality. But if
5 you're going to argue the point, you have to argue it as on
6 the grounds of materiality.

7 If there was 404(b) evidence coming in for something
8 like lack of mistake and the government -- and I let it in and
9 the government only argued -- or just kept hammering the fact
10 that your client did something wrong at another time and never
11 tied it to how the jury could use it, that would be improper.

12 If it's admitted for a purpose it has to be argued
13 for that purpose. If you're going to go to things about the
14 open and obvious nature of the misrepresentations that your
15 client allegedly made in order to challenge materiality,
16 that's the way you have to do it. I think that gives you what
17 you want.

18 I mean, do you disagree with what I'm saying as far
19 as the law?

20 MR. FINLAYSON: I don't. I think I get it. And I
21 think it's more of a -- I'll make sure that I argue it the
22 right way at closing. I do think -- I just want to make sure
23 that I can ask about the names. I can at least inquire about
24 well, this name was here and this name was here?

25 THE COURT: Yes.

1 MR. FINLAYSON: Okay. And that's all I want to do.

2 THE COURT: Yes. I'm assuming what they're going to
3 say is there are 493 names here. We look for a bunch of
4 different names that is included in all of these things. We
5 don't go do background checks and, yes, maybe we don't do look
6 at each individual name. I scanned the list and most of them
7 just looked like names of people. I mean, I had no idea who
8 Monica Sweeten was. Y'all kept asking about her and now I
9 know who she is, she is a person. It's not like every one.
10 It's not like he got the list of the entire cast of the House
11 of Stark or something like that. I mean, at any rate, you-all
12 can argue it that way.

13 Mr. Evert, does that give you what you were looking
14 for at least some?

15 MR. EVERT: Yeah, I think at least some --

16 THE COURT: So at least I think we're all on the same
17 page. Whether there is abiding of it, at least in the spirit,
18 we'll have to see. But you can also ask for an instruction --

19 MR. EVERT: Okay.

20 THE COURT: -- in this regard. If you think that
21 there is a series of evidence that's come out one way, we can
22 instruct the jury as to things like that. I'm not telling you
23 that I think we're there yet. I'm looking at your
24 instructions now.

25 But I think we do have materiality as defined, I

1 would assume. But, you know, you can consider whether to do
2 that. But he does get to make an argument that like -- I
3 suppose at some point, a lie is so dumb that no one could
4 possibly rely upon it and, therefore, it can't possibly be
5 material.

6 I don't think this is that type of case. I think in
7 this case, in the reality of it, I think the government was
8 pushing out as much money as they could and they were going to
9 go back and they were going to police people. And there
10 wasn't a lot of policing on the front end.

11 MR. EVERT: Right.

12 THE COURT: And that may be -- so that may be here,
13 that that's part of this. But certainly there could be some
14 things that are said in a different context that are so
15 outrageous, no one could possibly rely upon it. And so that
16 concept does exist in a fraud case.

17 MR. EVERT: Sure. But I think we're pretty far from
18 that.

19 THE COURT: I think so, too.

20 MR. EVERT: Yeah.

21 THE COURT: I think so, too.

22 And I think defense counsel recognizes that and
23 that's why he's agreed that's what the sort of playing field
24 is.

25 MR. EVERT: I understand.

1 THE COURT: You will just have to police it either
2 with objections or with an instruction.

3 MR. EVERT: Okay. Understood.

4 THE COURT: And, by the way, this idea that you can't
5 object in a closing argument for both sides, I mean, so what
6 if you object during a closing argument. I mean, that's
7 always been like forbidden, people are like, oh, why would you
8 object.

9 But if somebody is saying something wrong in closing
10 arguments, what's wrong with objecting?

11 I've interrupted people in closing if they've done
12 something that I've said they can't do. This is supposed to
13 be a fair playing field. And so that's how you keep it fair.

14 So we have all of those -- you have all of those to
15 try to police the line that you think exists and that I think
16 he acknowledges exists and that both of you want to abide.

17 All right? Thank you.

18 MS. CONNORS: Your Honor, I apologize. I just wanted
19 to just point out one thing, just to front this, because I
20 know we're going to talk about jury instructions later.

21 But just since we were just talking about reliance
22 and victim relying on information, I just want to remind the
23 Court that the Eleventh Circuit pattern jury instruction on
24 wire fraud and bank fraud says a fact is material if it has
25 the capacity or natural tendency to influence a person's

1 decision.

2 It doesn't matter whether the decision maker actually
3 relied on the statement or knew or should have known that the
4 statement was false. I only point that out because I just to
5 make sure that we're all --

6 THE COURT: I think that goes right to this issue.
7 I'm sorry, I didn't mean to cut you off. I think that goes
8 exactly to this issue.

9 MS. CONNORS: Yes, Your Honor. And that's why I just
10 wanted to point it out --

11 THE COURT: Yes.

12 MS. CONNORS: -- to make it clear. Because I know we
13 were talking about maybe there could be something so absurd
14 that somebody didn't rely upon it, but just that is not going
15 to be the standard ultimately.

16 THE COURT: You're right. When I say that, I'm
17 talking about something that we would all recognize as puffery
18 in a commercial context. That's what I'm talking about.

19 MS. CONNORS: Okay.

20 THE COURT: I'm not talking about anything like
21 John Snow worked for me. I suspect that they never looked at
22 that. I suspect that they skimmed through it and saw it and
23 they looked at the part where he said we have 493 employees,
24 and they saw that there were a bunch of names attached. I'll
25 bet that's what they did. And so I think that instruction is

1 exactly what we want.

2 MS. CONNORS: I agree.

3 MR. FINLAYSON: No.

4 THE COURT: And I don't know how many times you want
5 to say it during your closing, but I'm not going to stop you
6 from saying it as many times as you want and I'm going to tell
7 them that before you start or something like that.

8 Okay?

9 MR. FINLAYSON: Understood.

10 THE COURT: All right. Do you want to say something?

11 MR. FINLAYSON: No, sir.

12 THE COURT: All right. Let's bring them in.

13 COURTROOM SECURITY OFFICER: All rise.

14 (Whereupon, the jurors entered the courtroom.)

15 THE COURT: All right. Y'all can be seated.

16 Everybody okay?

17 Everybody abide the rules?

18 Sorry to have kept you waiting. We had some things
19 that we had to address this morning. Okay?

20 We were here until pretty late last night and then we
21 wanted to sort of circle back on a couple of things. Okay?

22 But I know you-all have got expectations for when
23 this will be done and we're being mindful of that. Okay?

24 And, sir, I wore my Falcons tie today, all right.

25 JUROR: Okay.

1 THE COURT: I'm not trying to start beef. Y'all have
2 got a better team.

3 JUROR: A championship, too.

4 THE COURT: I hear you. At least he didn't say 28 to
5 3. I appreciate that.

6 All right. Government, go ahead and call your next
7 witness.

8 MR. EVERT: The government would call
9 Rosemarie Drake.

10 THE COURT: I was thinking about you last night. I
11 got home and my kids were watching a show called
12 Abbot Elementary. And it's got this great scene where Hurts
13 and a couple of other guys appear on it and it was pretty
14 funny.

15 - - -

16 ROSEMARIE DRAKE,
17 A witness herein, having been first duly sworn, was examined
18 and testified as follows:

19 - - -

20 COURTROOM DEPUTY: Thank you. For the record, will
21 you please state and spell your first and last name?

22 THE WITNESS: Rosemarie R-O-S-E-M-A-R-I-E, middle
23 initial A, Drake, D-R-A-K-E.

24 COURTROOM DEPUTY: Thank you. You may be seated.

25 DIRECT EXAMINATION

1 BY MR. EVERT:

2 Q. Good morning, Ms. Drake.

3 A. Good morning.

4 Q. Where do you work?

5 A. The U.S. Small Business Administration.

6 Q. And what is the U.S. Small Business Administration?

7 A. It's a federal agency used to support small businesses to
8 aid and access to capital, contracting assistance as well as
9 counseling and mentoring.

10 Q. And where are the small businesses that the -- and if I
11 refer to the Small Business Administration as the SBA, is
12 that --

13 A. That is correct. That's the acronym, that's correct.

14 Q. So where are the small businesses that the SBA helps
15 located?

16 A. In the United States and its territories.

17 Q. In general, what types of businesses are considered small
18 businesses?

19 A. Small businesses are usually less than 500 employees.
20 Also the size standard based on their revenue would be based
21 on the NAICS Code.

22 Q. And what is your title at the SBA?

23 A. My current title is the deputy district director for the
24 State of Georgia.

25 Q. And what are your duties as the deputy district director

1 for the State of Georgia?

2 A. Currently, I support businesses in Georgia, whether
3 they're in business or not, entrepreneurs looking to get in
4 business, for technical assistance, helping them get resources
5 for access to capital. I also do compliance for our
6 procurement program, the 8A program, as well as support the
7 small business development centers, which is our resource
8 partners.

9 Q. And how long have you been with the SBA?

10 A. I started in 2013, with a short break, and I've been here
11 since then.

12 Q. And what was your role when you first started at the SBA?

13 A. I was a lender relations specialist in the Philadelphia
14 district office.

15 Q. And you mentioned that you briefly left the SBA. When was
16 that?

17 A. I did. I left in 2018.

18 Q. And what -- where were you when you left?

19 A. I went to Bank of America back to banking.

20 Q. And when did you return to the SBA?

21 A. I returned in 2019.

22 Q. And when you first rejoined the SBA, what was your
23 position?

24 A. I came back as the 7A policy chief over the loan program
25 and policy.

1 Q. And is the 7A program, is that focused on loans for small
2 businesses?

3 A. It does.

4 Q. Where are the small businesses that the 7A program helps
5 located?

6 A. In the United States and its territories.

7 Q. Does the 7A program provide loans to non-United States
8 businesses?

9 A. No.

10 Q. How long have you been the 7A policy chief -- or how long
11 were you in the 7A policy chief position?

12 A. From 2019 until January 2022.

13 Q. And what were your duties as the 7A policy chief?

14 A. Assisting with writing the policy for the 7A loan program
15 as well as training lenders. Also supporting the application
16 for the 7A loan program, and of course the Paycheck Protection
17 Loan Program, which is a subprogram of the 7A loan program.

18 Q. And did you remain in that role until January '22, and
19 then transition into -- back into your current role?

20 A. Yes.

21 Q. So you mentioned the Paycheck Protection Program or PPP,
22 can you briefly describe that?

23 A. It was a temporary loan program during the pandemic to
24 support American businesses and keep American employees
25 employed during the pandemic.

1 Q. And what was the SBA's role with respect to the PPP
2 program?

3 A. Along with the U.S. Treasury, we were implementing the
4 program for the policies and supporting lenders with getting
5 the monies rolled out to the businesses.

6 Q. And did you have personal involvement with the PPP?

7 A. Yes.

8 Q. What was your role with respect to the PPP program?

9 A. Along with the team, supporting the team with the rollout
10 of the application, the interim final rules as well as the
11 policies related to that and supporting the lenders throughout
12 the program.

13 Q. And you mentioned on creating -- you mentioned working on
14 creating application. Can you explain what that -- what that
15 entailed?

16 A. Yes. Our normal application, the 1919, which was the 7A
17 loan application was not used.

18 THE COURT: Could you just talk a little slower?

19 THE WITNESS: Oh okay. I'm sorry.

20 THE COURT: You have great volume, just a little bit
21 slower.

22 THE WITNESS: Okay. All right.

23 THE COURT: Thank you.

24 THE WITNESS: So, yes. The 7A loan application was
25 not used. We modified the loan application so that it would

1 be more efficient and get the loan funds out quicker for the
2 loans so we were able to put together a one- or two-page
3 application to allow for quick expedition of getting the loans
4 out.

5 BY MR. EVERT:

6 Q. And in terms of developing the policies and procedures for
7 the -- for the PPP, what -- what were the goals of the PPP
8 program?

9 A. To keep American workers employed and paid.

10 Q. And was speed also a part of the goal?

11 A. Yes.

12 Q. Now, you mentioned keeping Americans workers employed and
13 paid.

14 Was a goal of the program to help keep workers in
15 Ghana employed and paid?

16 A. No.

17 Q. And why was the focus on American workers specifically?

18 A. Because there was a mandate to shut down the U.S. during
19 the pandemic, so that there was less of being out in the
20 public. We wanted to make sure that they were -- the
21 employee -- the employees were paid and stayed hired.

22 Q. And is the SBA an international organization or is it an
23 American organization, can -- is it -- is it an agency of the
24 U.S. Government?

25 A. It is a domestic organization -- agency under the federal

1 government.

2 Q. The U.S. federal government?

3 A. The U.S. federal government.

4 Q. And were foreign businesses eligible for PPP loans?

5 A. No.

6 Q. Would a mining company with all of its employees in Ghana
7 have been eligible for a PPP loan?

8 A. No.

9 Q. So you mentioned that speed was an issue.

10 Why was processing these loans quickly important as
11 part of the PPP program?

12 A. One, it was a mandate by the United States president.

13 And secondly, it was to get the funds directly to the
14 businesses that were in need of getting the funds.

15 Q. And when was the PPP program originally created?

16 A. On March 2020.

17 Q. And were there multiple opportunities to get PPP loans?

18 A. Yes.

19 Q. When was the second round of the PPP program announced?

20 A. The second round was December of 2020.

21 Q. And specifically was the -- was that part of the Economic
22 Aid Act passed by Congress and signed into law in -- on
23 December 27th of 2020?

24 A. Yes.

25 Q. During what time period could businesses apply for a

1 PPP loan during that second round?

2 A. It was through March of 2021.

3 Q. And starting in January?

4 A. January -- January 13th. There was a short period that
5 allowed for smaller businesses to apply for the loan, just a
6 two-day period, a two-day period.

7 Q. So businesses were eligible to apply starting in January
8 of 2021?

9 A. Yes.

10 Q. Was there a high demand for PPP loans?

11 A. Yes.

12 Q. Were there more applications for PPP loans than businesses
13 that got PPP loans?

14 A. Yes.

15 Q. If a business wanted a PPP loan, who would it apply to for
16 the loan?

17 A. It would apply to lenders that would approve through the
18 SBA.

19 Q. And so what was the lender's role with -- and just to be
20 clear, was the SBA the lender or were there different lenders?

21 A. SBA was not a direct lender.

22 Q. So would the lenders be institutions like banks?

23 A. Yes.

24 Q. What were -- what was the lender's role with respect to a
25 given PPP loan?

1 A. To originate, underwrite, service, close and liquidate, if
2 necessary.

3 Q. And could you just explain a little bit what those --
4 those terms mean?

5 A. Sure. They were responsible for completing the
6 application, the borrower/applicant would complete the
7 application, submit it to the lender.

8 The lender then was required to take the borrower's
9 applicant -- I keep saying applicant and borrower because it's
10 an applicant before the loan is done -- the information
11 provided on the application, the lender then would take that
12 information, make sure that it was in compliance with the
13 rules set -- set at the time. And then they would close the
14 loan, fund the loan and then service the loan.

15 Q. And so if a business got a PPP loan, who would the money
16 for that loan be coming from?

17 A. The lender.

18 Q. And what type of verification were the lenders required to
19 do with respect to the information in a given loan
20 application?

21 A. The lenders were allowed to use the borrower's
22 certification that the information was true and correct.

23 Q. And was that different from the process -- was the process
24 for verification of a PPP loan different from the process of
25 getting a normal loan?

1 A. Yes.

2 Q. Can you explain how this was different?

3 A. Sure. During the normal process of obtaining an SBA loan,
4 the lender would have to collect all the information,
5 underwrite the loan. And at the time of underwriting, verify
6 that all the information was correct and get the tax
7 transcripts prior to submitting to SBA for a loan number prior
8 to closing and disbursing the funds to the borrower.

9 Q. And so was -- was any of that required with respect to a
10 PPP loan?

11 A. It was not.

12 Q. Why were there these different verification requirements
13 between a regular loan and a PPP loan?

14 A. Because this was during the emergency of a -- a national
15 emergency that the U.S. president, along with Congress, said
16 that those things were exempt during this process. And it was
17 a 100 percent guaranteed loan, which allowed for full
18 forgiveness if it was closed in compliance and the funds were
19 disbursed and used in accordance with the guidelines.

20 Q. And if there was false information in the loan
21 application, was that the lender's fault or was that the
22 applicant's fault?

23 A. It would be the applicant's.

24 Q. Could an applicant choose which lender they wanted to get
25 a loan from?

1 A. Yes.

2 Q. What was the SBA's role with respect to a given PPP loan?

3 A. SBA's role was to allow for the lenders to get a
4 100 percent guarantee if the loan was closed and serviced in
5 accordance with the guidelines and so they backed the loan.

6 Q. And by backing the loan, does that just mean that the
7 lender would give the amount of the loan to the bank on the
8 back end, if the requirements had been met?

9 A. In the event of default.

10 Q. Okay. Were there requirements -- were all businesses
11 eligible for PPP loans?

12 A. No.

13 Q. Were there -- were there requirements that a business had
14 to meet to be eligible for a PPP loan?

15 A. Yes.

16 Q. If you wouldn't mind flipping in your binder to what's
17 been premarked for identification as Government's Exhibit 150,
18 please.

19 A. There are three binders.

20 Q. Okay.

21 A. Five, actually.

22 Q. Oh, it's in the first binder, binder number one.

23 A. Binder number one. Did you say which page again?

24 Q. It's the last page of the first binder or the last
25 document in the first binder. Document Number 150. Is that

1 it?

2 A. No.

3 Q. Oh, no. Okay.

4 THE COURT: Just come on up and find it for her.

5 BY MR. EVERT:

6 Q. I'll find it. I'll help you.

7 A. This is binder number one. This is binder number two.

8 Q. Let's see. Okay.

9 MS. CONNORS: Your Honor --

10 BY MR. EVERT:

11 Q. And we also -- well -- so do you recognize this document?

12 A. Yes.

13 Q. What is it?

14 A. It's the Paycheck Protection Program borrower obligation.

15 Q. And who created this form?

16 A. The SBA in consultation with the IRS, U.S. Department of
17 Treasury.

18 Q. And are you familiar with this form?

19 A. Yes.

20 Q. Were you involved with its creation?

21 A. Yes.

22 Q. How were you involved?

23 A. My team put together the application and I was the one
24 that submitted it to OPM.

25 MR. EVERT: I would move to admit Government's

1 Exhibit 150.

2 MR. FINLAYSON: No objection.

3 THE COURT: Okay. 150 is admitted. And as we talked
4 about yesterday, anything admitted can be published to the
5 jury.

6 MR. EVERT: Could we please publish Government's
7 Exhibit 150.

8 BY MR. EVERT:

9 Q. So -- and this is a blank form?

10 A. It is not.

11 Q. Oh, so nobody has filled this -- this --

12 A. Oh, correct.

13 Q. Yeah.

14 A. Yes.

15 Q. Did every applicant for a PPP loan have to fill out the
16 information in this form, regardless of what bank they were
17 getting their loan from?

18 A. Yes.

19 Q. And why was that required?

20 A. All the information required determined if the applicant
21 was eligible.

22 Q. And was it important to -- for purposes of the PPP loan --
23 that the information -- that all the information provided in
24 this loan be included?

25 A. It's required.

1 Q. And was it important that the information provided in this
2 form be accurate?

3 A. Yes.

4 Q. Were there any requirements on when a business had to have
5 been in operation in order to be eligible to get a PPP loan?

6 A. Yes.

7 Q. When did the business have to have been in operation by?

8 A. On or before February the 15th, 2020.

9 Q. And why did that restriction exist?

10 A. It existed because the business had to be in operation in
11 order to qualify for a PPP loan.

12 Q. And was the purpose of the PPP program, was that geared
13 towards helping existing businesses --

14 A. Yes.

15 Q. -- with -- that were affected by the COVID 19 pandemic?

16 A. Yes.

17 Q. On Page 2, the bottom half of the page, there are --
18 there's a series of ten statements, starting right here
19 (indicating).

20 MR. EVERT: If we could just blow that up.

21 BY MR. EVERT:

22 Q. Can you please explain what these -- without reading them
23 all, what -- what are these statements?

24 A. These statements are making sure that the applicant was in
25 business prior to February the 15th, 2020.

1 But also that there was a need to have a funding to
2 support the business that was in operation and that the funds
3 would be used for the intended purpose of the program and that
4 all the information provided within the application was true
5 and correct.

6 Q. And the line right here that begins the authorized
7 representative of the applicant must certify -- there's a line
8 that says the authorized representative of the applicant must
9 certify in good faith to all of the below by initialing next
10 to each one.

11 Would you please read the first statement that needed
12 to be initialed?

13 A. Are we talking about the applicant was in operation?

14 Q. Yes.

15 A. Okay. The application -- the applicant was in operation
16 on February the 15th, 2020, and has not permanently closed,
17 and was either an eligible self-employed individual,
18 independent contractor, or sole proprietorship with no
19 employees, or had employees for whom it paid salaries and
20 payroll taxes or paid independent contractors, as reported on
21 Forms 1099-MISC.

22 Q. Did every application -- applicant for a PPP loan have to
23 certify that that statement was true?

24 A. Yes.

25 Q. And what did it mean to be in operation?

1 A. It meant that the business had generated revenues.

2 Q. If a business was operating in Ghana but not operating in
3 the United States, would it have been correct to say that it
4 was in operation for purposes of this form?

5 A. No.

6 Q. If a business did not provide documentation showing that
7 it was in operation as of February 15th, 2020, could it have
8 gotten a PPP loan?

9 A. No.

10 Q. Can you please read the second certification on Page 2.

11 A. Current economic uncertainty makes this loan request
12 necessary to support the ongoing operations of the applicant.

13 Q. And why was this certification included?

14 A. We wanted to make sure that the applicant was currently in
15 operation and they did not have liquidity to support the
16 ongoing operations of the business.

17 Q. If a company did not have any operations, could the loan
18 have possibly been necessary to support the ongoing operations
19 of the business?

20 A. No.

21 Q. If a company was registered in the United States but did
22 not have any U.S. operations, would it have been eligible for
23 a PPP loan?

24 A. No.

25 Q. Were there any restrictions on the number of employees

1 that a business could have?

2 A. Yes.

3 Q. In general, how many -- what was that cap?

4 A. In general, it's 500 employees.

5 Q. And why did that restriction exist?

6 A. Because that's a part of the size standard to determine
7 small businesses.

8 A. And turning back to Page 1, if we could look at the top
9 right-hand corner. It says, Applicant including affiliates --
10 it's the second box on the right down here.

11 It says, Applicant including affiliates, if
12 applicable, meets size standard. And then there are three
13 boxes to check.

14 A. Yes.

15 Q. Is this -- is this box geared towards making sure that the
16 business meets that requirement?

17 A. That is correct.

18 Q. Were there any limits on the amount of money that an
19 applicant could get a PPP loan for?

20 A. Yes.

21 Q. What were those limits?

22 A. For the first round, it was \$10 million. For the second
23 round, it would have been \$2 million.

24 Q. And when you say the first round and second round, you
25 mean if you were getting your first loan, you could get

1 \$10 million -- up to \$10 million?

2 A. Up to \$10 million.

3 Q. And then if you were applying for a second loan, you could
4 get up to \$2 million; is that correct?

5 A. Yes.

6 Q. So how was the amount of money for a PPP loan calculated?

7 A. Based on the average payroll amount.

8 MR. EVERT: And if we could zoom back out and zoom
9 into this middle section here.

10 BY MR. EVERT:

11 Q. And specifically, how did the average monthly payroll
12 factor into the amount of the loan?

13 A. It was based on the average monthly payroll times two and
14 a half.

15 Q. And were there any restrictions on where the employees had
16 to reside for purposes of calculating the average monthly
17 payroll?

18 A. Yes. The employees had to reside -- their principal place
19 of residence had to reside in the United States.

20 Q. And why did that restriction exist?

21 A. Because the PPP loan was geared towards American workers.

22 Q. On Page 1, Item Number 7, it says, Is the United States
23 the principal place of residence for all employees included in
24 the applicant's payroll calculation above? Why did the form
25 include this?

1 A. Because that's a part of the eligibility.

2 Q. And if the answer to that question had been no, could the
3 loan have been approved?

4 A. It would not have been eligible.

5 Q. And how was it determined whether the United States was an
6 employee's principal place of residence?

7 A. It's based on the IRS determination of place of residence.

8 Q. And if a business had employees in foreign countries,
9 could payments to those employees be counted for purposes of
10 calculating the amount of the PPP loan that the business could
11 receive?

12 A. No.

13 Q. Was it enough that a person was a U.S. citizen for that
14 person -- if -- if that person lived in another country, could
15 a U.S. citizen who lived in -- who resided in other countries
16 payroll be counted in terms of calculating the amount of the
17 loan?

18 A. Would you repeat the question?

19 Q. Yes. Sorry. That was terrible. Sorry.

20 All right. If a person was a U.S. citizen but they
21 resided in another country, could their employer count the
22 money paid to that employee when calculating the average
23 monthly payroll for purposes of calculating the size of the
24 PPP loan they could get?

25 A. No.

1 Q. And why, why not?

2 A. Because the purpose of the PPP loan was to keep American
3 workers paid. And the determination for the number of
4 employees was based on a size standard, not to calculate the
5 loan amount.

6 Q. And what about if an American expat who lived and worked
7 in Ghana but still had a house in the United States, would
8 that person -- would you be allowed -- would a business be
9 allowed to count that person's pay in calculating their
10 average monthly payroll?

11 A. They would not if they did not meet the IRS standard for
12 principal place of residence.

13 Q. And if a business used independent contractors, could
14 payments to those contractors be included in the business's
15 monthly payroll?

16 A. No. Independent contractors were eligible to apply
17 separately.

18 Q. And what about employees paid in cash under the table,
19 could they count towards monthly payroll?

20 A. No.

21 Q. If a company was registered in the United States but
22 operating solely in another country, would that company be
23 eligible for a PPP loan?

24 A. No.

25 Q. Why not?

1 A. Because it was for U.S. businesses.

2 Q. If a company's owner lived in the United States but the
3 company solely operated in another country, would that change
4 the answer?

5 A. No.

6 Q. Were there any restrictions on how much an employee could
7 make in order for the payments to that employee to count
8 towards the monthly payroll calculation?

9 A. Yes.

10 Q. What was that limit?

11 A. \$100,000.

12 Q. So say an employee made \$250,000 a year, how much would
13 that employee -- and -- how much would that employee's pay
14 count for when calculating the employer's average monthly
15 payroll?

16 A. Up to \$100,000.

17 Q. So say employee X makes -- say a company has one employee,
18 employee X, employee X makes \$250,000.

19 What amount can they say their average monthly
20 payroll is?

21 A. Based on \$100,000.

22 Q. Got it. So even if an employee made more than \$100,000,
23 did that employee still count towards the 500 employee cap?

24 A. Yes.

25 Q. Were there any circumstances where the amount of the loan

1 could be based on gross income as opposed to average monthly
2 payroll?

3 A. Yes.

4 Q. What were those circumstances?

5 A. The Schedule F for farmers and ranchers.

6 THE COURT: Wait. Say that again. A schedule F?

7 THE WITNESS: Schedule F.

8 THE COURT: For farmers and ranchers?

9 THE WITNESS: Yes.

10 THE COURT: Okay.

11 BY MR. EVERT:

12 Q. And was there a cap as to the size of the loan that could
13 be received based on gross income?

14 A. Yes.

15 Q. Was that -- what -- what was that cap?

16 A. \$100,000.

17 Q. So you -- you couldn't say you had average monthly payroll
18 of more than \$100,000 based on that; is that correct?

19 Strike that. That was --

20 A. Okay. I didn't understand the question.

21 Q. Yeah. But there was a \$100,000 cap on that, correct?

22 A. There's a \$100,000 cap when calculating the average
23 calculation for individuals, employees.

24 Q. And given that cap, would it be possible to get a
25 \$9 million PPP loan based on the gross income of the company?

1 A. No.

2 Q. If a loan was going to be based on gross income, would
3 that have had to have been reflected on the form?

4 A. Yes.

5 Q. In connection with a PPP loan application, did an
6 applicant have to submit any documentation of its payroll?

7 A. Yes.

8 Q. If a business submitted tax records in support of its
9 application, did those documents have to have actually been
10 filed with the IRS?

11 A. Yes.

12 Q. And if a -- if a business supported documents in support
13 of its application, did those documents have to contain true
14 information?

15 A. Yes.

16 Q. Was an applicant allowed to make up information --

17 A. No.

18 Q. -- in order to get a PPP loan?

19 A. No.

20 Q. Were there requirements for how funds received from a
21 PPP loan had to be used?

22 A. Yes.

23 Q. What -- what did the proceeds of a PPP loan have to be
24 used for?

25 A. Payroll, rent, mortgage expense, mortgage interest

1 expense, excuse me, covered expenditures, covered protection
2 wear and utilities.

3 Q. Turning to Page 2, if we could please look at the third
4 certification, starting with, The funds will be used.

5 It states the funds will be used to retain workers,
6 maintain payroll or make payments for mortgage, interest,
7 rent, utilities, covered operations, expenditures, covered
8 property damage costs, covered supplier costs and covered
9 worker protection expenditures.

10 THE COURT: You're now going too fast.

11 THE WITNESS: Yes.

12 MR. EVERT: I'm going too fast, okay.

13 THE COURT: Everybody should talk slower than they
14 think is normal.

15 MR. EVERT: Okay.

16 BY MR. EVERT:

17 Q. So this -- this certification, which says the funds will
18 be used to retain workers and maintain payroll or make various
19 other payments, was this geared towards those spending
20 requirements for the proceeds of the loan?

21 A. Yes.

22 Q. Could PPP funds be used to support non-U.S. workers?

23 A. No.

24 Q. Could PPP funds be used to support non-U.S. operations?

25 A. No.

1 Q. Could PPP funds be used to purchase personal residences?

2 A. No.

3 Q. What if the business that had applied for the PPP loan was
4 headquartered at a personal residence?

5 A. If it was an eligible expense, they could use it for that
6 purpose, but no.

7 Q. And eligible expense meaning -- can you explain what that
8 means?

9 A. If there's a home office and they use a home office and
10 they use that for the purpose of the IRS and they report it to
11 the IRS, for that purpose of that home office expense, they
12 could use some of it for the home office expense.

13 Q. Would they be allowed to buy the whole -- buy a whole
14 house, a whole new house?

15 A. No.

16 Q. Could PPP funds be used to purchase personal vehicles?

17 A. No.

18 Q. Could PPP funds be used to start a new business?

19 A. No.

20 Q. Why not?

21 A. You had to be in operation before February the 15th, 2020.

22 Q. If a -- if an individual wanted to start a new business
23 and wanted assistance from the SBA to do so, are there
24 programs available that could provide such a loan?

25 A. Yes.

1 Q. Did those exist in 2021?

2 A. Yes.

3 Q. And in order to get a loan under such a program, would an
4 applicant need to provide more or less documentation than what
5 was required to get a PPP loan?

6 A. It would be required to provide all the information that
7 would be for a 7A loan, so it would be more information.

8 Q. And in getting a 7A loan, would the -- would the
9 verification that the -- that the lender would be -- do --
10 sorry.

11 In order to get a 7A loan, would the verification
12 that the lender would be doing be more onerous or less onerous
13 than what -- what was done for a PPP loan?

14 A. It would be more onerous.

15 Q. And I believe you -- you touched on this already, but just
16 to be clear, why was there less documentation required for a
17 PPP loan than a conventional loan?

18 A. Due to the national emergency, the speed in getting the
19 funds out to American businesses.

20 Q. Were there circumstances under which a PPP loan could be
21 forgiven?

22 A. Yes.

23 Q. If an applicant was not planning to seek forgiveness, was
24 the applicant allowed to use the funds for non-business
25 purposes?

1 A. No.

2 Q. If the applicant was not planning to seek forgiveness, was
3 the applicant allowed to use the funds to buy a personal
4 residence?

5 A. No.

6 Q. If the applicant was not planning to seek forgiveness, was
7 the applicant allowed to use the funds to buy personal
8 vehicles?

9 A. No.

10 Q. If the applicant was not planning to seek forgiveness, was
11 the applicant allowed to use the funds to start a new
12 business?

13 A. No.

14 Q. If the applicant did not plan to seek forgiveness, was the
15 applicant allowed to provide false information in his or her
16 application?

17 A. No.

18 Q. Was it important that the information -- well, was it
19 important that the applicant attested that the information
20 provided in its application was correct?

21 A. Yes.

22 Q. If an applicant did not attest to the accuracy of the
23 information in the application and the supporting documents,
24 could the loan have been issued?

25 A. No.

1 MR. EVERT: No further questions.

2 CROSS-EXAMINATION

3 BY MR. FINLAYSON:

4 Q. Good morning, Ms. Drake.

5 A. Good morning. How are you?

6 Q. I'm good. I have a few questions for you. So you're with
7 the SBA?

8 A. Yes.

9 Q. And that is a -- is that a Georgia agency or is it a
10 federal agency?

11 A. It's a federal agency.

12 Q. And you are under what branch of the government?

13 A. Executive branch.

14 Q. You guys are still funded?

15 A. We are still funded.

16 Q. Good to hear.

17 So going back to the pandemic times, the PPP loan
18 program was originated by Congress and the president, right?

19 A. Yes.

20 Q. Okay. And SBA did not loan the money, it was the banks
21 that were actually loaning out the money, right?

22 A. Yes.

23 Q. And the SBA, did the SBA or the United States government
24 guarantee those loans?

25 A. The SBA guaranteed the loans.

1 Q. Okay. And that means the bank wasn't on the hook for it,
2 right?

3 A. Yes, they were on the hook.

4 Q. They were on the hook?

5 A. Yes.

6 Q. So if there is a default on the loan, the bank has to pay
7 that money?

8 A. No. SBA guaranteed the loan. But the lender still had to
9 disburse the funds, they had to close the loan, they had to
10 liquidate the loan, then they had to submit it to SBA for the
11 guarantee.

12 Q. Okay. And so when someone applied for a PPP loan, they
13 did not come to the SBA, right?

14 A. No.

15 Q. They went to the bank, right?

16 A. Yes.

17 Q. And the bank was the one that processed that application?

18 A. Yes.

19 Q. And the bank did have a due diligence requirement there,
20 did it not?

21 A. Yes.

22 Q. And you actually -- he asked you the direct question, if
23 there was -- I guess if there was misinformation -- his
24 question was is that the lender's fault or the applicant's
25 fault, right?

1 A. He did ask that question.

2 Q. And you said it would be the applicant's fault, right?

3 A. I said it would be the applicant's fault if the applicant
4 provided false information.

5 Q. But the lender did have some due diligence obligation, did
6 it not?

7 A. The lender had due diligence, but the lender could
8 attest -- could take the applicant's information that it was
9 true and correct.

10 Q. Okay. So if you submitted something crazy in crayon and
11 said I am the king and give me the money and the bank
12 processed that, that would be okay?

13 A. It would not.

14 Q. The bank has to look at the documents, does it not?

15 A. The bank reviews the application and can request
16 additional documentation.

17 Q. The bank does make money on these -- on these loans, don't
18 they?

19 A. Yes.

20 Q. Okay. They get money on the front end and the back end?

21 A. No, just the front end.

22 Q. Okay. And what kind of percentage does the bank make?

23 A. It was 1 percent.

24 Q. You asked -- you were talking about -- and I'm going to
25 change topics here -- who is qualified to be counted as an

1 employee.

2 And you were asked if there were workers that were
3 out of the country but their house was in the United States,
4 you said that that person couldn't be counted as an employee
5 for a -- for PPP calculations, right?

6 A. What I said is that they had to be counted for affiliation
7 purposes, all employees domestic and foreign have to be
8 counted for size standards to determine if the business is
9 small, but when you determine the loan amount, it was based on
10 the number of employees in the United States and their
11 principal residences in the United States.

12 Q. Well, and it's -- it's the principal place of residency, I
13 believe you said as defined by the IRS, right?

14 A. That is correct.

15 Q. You're not the IRS, I'm guessing, right?

16 A. I am not.

17 Q. Do you actually have that definition of as defined by the
18 IRS, what that means?

19 A. I do not. But we do have reference to it in the CFR.

20 Q. Okay. So if for IRS -- if the IRS decides you are a
21 resident of the United States, even if you live abroad, then
22 you could be counted, right?

23 A. If the IRS determines that your principal place of
24 residence is in the United States, you would be considered the
25 principal place of residence in the United States.

1 Q. And, for example, like where somebody resides -- maybe
2 somebody wants to say they reside in Florida because they've
3 got better tax laws, but they spend 51 percent of the year --
4 or, no, 49 percent of the year in Vermont, I mean, that's --
5 the IRS -- there are rules for that and the IRS decides where
6 you are a legal resident of, right?

7 A. I presume, yes.

8 Q. And you're not an expert on that stuff, I'm guessing?

9 A. I am not.

10 Q. Okay. So you can't say, for instance, that Mr. Delano's
11 employees that were working in Ghana, whether they met the
12 legal definition of resident there or here, can you?

13 A. I cannot.

14 Q. Okay. You were asked about the -- there's a requirement
15 that the business had to be in operation before February 15th,
16 2020, correct?

17 A. On or before.

18 Q. On or before, okay. And that's in operation, right?

19 A. That's correct.

20 Q. It's not incorporated, right?

21 A. That's correct.

22 Q. Okay. And you mentioned that PPP loans could be forgiven,
23 right?

24 A. Yes.

25 Q. If they met the criteria?

1 A. Yes.

2 Q. And if the person asked for the loan to be forgiven,
3 correct?

4 A. Yes.

5 Q. And what means, if you ask for your loan to be forgiven
6 and it was agreed to be forgiven by, I guess -- who made that
7 decision, the bank or you guys?

8 A. The bank looks at the application, the information
9 provided, to determine if it met the forgiveness requirements.
10 And then the bank would then submit, unless the loan was under
11 \$150,000.

12 And the loans under \$150,000 could do direct
13 forgiveness. Loans over \$150,000 had to go through the
14 lender, the lender would determine if it met the criteria
15 based on the documents provided to submit for forgiveness.

16 Q. Okay. And if the person didn't ask for forgiveness,
17 they -- it became a regular loan which they had to repay,
18 right?

19 A. They would be required to make the payments on the loan.

20 Q. And there was a deferral period in that repayment plan?

21 A. It was.

22 Q. Okay. How long was that deferral?

23 A. I don't recall because it was extended.

24 Q. Maybe it was originally six months and then it went out to
25 over a year, right? Does that sound right?

1 A. It was originally six months. I don't recall how it was
2 extended, it was 8 or 12 months.

3 Q. And I gather that when the payments became due on the
4 loan, the bank would send the borrower notices saying, hey,
5 this is what you have due and this is when it's due. They
6 would send a regular loan statement; is that fair?

7 A. I presume they would.

8 Q. Okay. And I gather -- I mean, you have -- do you still
9 have to supervise these folks that have like part of the PPP
10 program like --

11 A. I don't directly supervise them. I work with the lenders
12 in Georgia.

13 Q. You work with the lenders. But do you have to review like
14 where loans are being repaid to this very day?

15 A. SBA does, yes.

16 Q. Not you personally?

17 A. Not me personally.

18 Q. Okay. And just to be clear, if someone met the criteria
19 for forgiveness and they requested it, they could be -- a
20 whole 100 percent of that loan could be forgiven?

21 A. Yes.

22 Q. And if they didn't request it, then a whole 100 percent of
23 that loan had to be repaid?

24 A. Yes.

25 MR. FINLAYSON: Nothing further, Judge.

1 REDIRECT EXAMINATION

2 BY MR. EVERT:

3 Q. Sorry, I'll just touch briefly on something that defense
4 counsel said. He said that if -- if the applicant didn't seek
5 forgiveness, the loan became a regular loan.

6 Was -- if you applied for a PPP loan, was it a
7 PPP loan at all times?

8 A. Yes.

9 Q. So even if you weren't seeking forgiveness, the -- you
10 still had a PPP loan; is that correct?

11 A. That is correct.

12 Q. And were you allowed to use the proceeds of your PPP loan
13 for ineligible purposes, even if you weren't seeking
14 forgiveness?

15 A. No.

16 Q. And even if -- even if a loan wasn't in -- wasn't seeking
17 to be forgiven, were you allowed to buy a personal residence?

18 A. No.

19 Q. Were you allowed to use the money to start a new business?

20 A. No.

21 Q. Were you allowed to buy personal vehicles?

22 A. No.

23 Q. Were you allowed to --

24 MR. FINLAYSON: Your Honor, objection; asked and
25 answered.

1 MR. EVERT: Were you allowed to put the down payment
2 on a yacht?

3 THE COURT: Let me rule.

4 MR. EVERT: I'm sorry.

5 THE COURT: I'm going to overrule the objection.
6 Go ahead.

7 BY MR. EVERT:

8 Q. Were you allowed to put the down payment on a yacht?

9 A. No.

10 Q. So on day one of the loan application, the person is
11 attesting that they are going to use that loan for authorized
12 purchases, correct?

13 A. Yes.

14 Q. And the person isn't seeking -- seeking forgiveness on day
15 one of the application, correct?

16 A. No.

17 Q. And regardless of what is in the person's head about if
18 they want to seek forgiveness down the line, if they don't
19 want to seek forgiveness down the line --

20 MR. FINLAYSON: Objection.

21 THE COURT: Ask the question.

22 BY MR. EVERT:

23 Q. So regardless of what is in a person's head about whether
24 they want to seek forgiveness down the line, whether they
25 don't want to seek forgiveness down the line, were they ever

1 allowed to provide false information in their loan
2 application?

3 A. No.

4 THE COURT: Overruled. Yes. You looked like you
5 were withdrawing your objection.

6 MR. FINLAYSON: That's correct.

7 THE COURT: Okay. You can answer the question. What
8 was the answer to the question?

9 THE WITNESS: It was no.

10 BY MR. EVERT:

11 Q. So they were never allowed to provide false information?

12 A. No.

13 MR. EVERT: No further questions. Thank you.

14 MR. FINLAYSON: Very quickly.

15 RECROSS-EXAMINATION

16 BY MR. FINLAYSON:

17 Q. So the requirements when you submit a PPP application and
18 say you're going to use this money for eligible expenditures,
19 right?

20 A. Yes.

21 Q. And there's also a provision that says if you don't,
22 you're not going to be entitled to forgiveness, right?

23 A. Yes.

24 Q. That's what the form -- that's what the paperwork says.

25 If you use it -- like say you go start another business with

1 it, you can't get forgiven for that, can you?

2 A. It's ineligible. You're not supposed to use it for those
3 purposes. Even though the loan was -- would be not forgiven,
4 the use of the proceeds must be for the payroll expense and
5 other covered -- covered expenditures.

6 Q. And the documentation, though, that is provided with
7 the -- with the PPP application says if you use it for
8 something else, you are not going to get forgiven, right?

9 A. Correct.

10 MR. FINLAYSON: Thank you.

11 MR. EVERT: One quick follow-up question.

12 FURTHER DIRECT EXAMINATION

13 BY MR. EVERT:

14 Q. If we could please turn to Page 2 of Government's
15 Exhibit 150. And if we could look at the second to last
16 certification there.

17 Would you please read that?

18 A. I further certify that the information provided in this
19 application and the information provided in all supporting
20 documents and forms is true and accurate in all material
21 respects.

22 I understand that knowingly making a false statement
23 to obtain a guaranteed loan from the SBA is punishable under
24 law -- under the law.

25 Q. And we can stop there.

1 A. Okay.

2 MR. EVERT: No further questions.

3 THE COURT: Okay. May the witness step down? No.
4 Go ahead.

5 MR. FINLAYSON: Let me do this the right way.

6 MR. EVERT: Yeah, I'm going to -- this wasn't in
7 effect at the time he applied for the loan.

8 MR. FINLAYSON: No. Oh, okay.

9 MR. EVERT: There are updated regs. They were
10 updated many times after that.

11 MR. FINLAYSON: Well, I'm going to see if she can
12 recognize it.

13 BY MR. FINLAYSON:

14 Q. I'm going to hand you what I've marked as Defendant's
15 Exhibit 1.

16 MR. EVERT: I would object on relevance grounds.

17 THE COURT: Okay. Why don't y'all step out for a
18 second. It seems like this might be a little more involved.

19 COURTROOM SECURITY OFFICER: All rise.

20 (Whereupon, the jurors exited the courtroom.)

21 THE WITNESS: Do you need me to step out, too?

22 THE COURT: And, ma'am, why don't you step out for
23 just a minute. Okay?

24 (Whereupon, the witness exited the courtroom.)

25 THE COURT: What are we talking about?

1 MR. FINLAYSON: CFR regulations about the use of --
2 of PPP funds for unauthorized purposes. And what I want to
3 get out of her is the provision that SBA will direct you to
4 repay those amounts.

5 And they object because they say this -- these CFRs
6 were updated subsequently and were not in effect at the time
7 of the loan.

8 MR. EVERT: There's been -- there were multiple --
9 this is the -- this is the March 2020 version of the regs. We
10 have the regs here that are --

11 THE COURT: That were in effect at the time?

12 MR. EVERT: That were in effect at the time.

13 THE COURT: What was the date of his loan?

14 MR. EVERT: His was March -- or he applied in
15 February 16th of 2021.

16 THE COURT: Okay.

17 MR. FINLAYSON: And my only -- this is the only copy
18 I've got in discovery, so I --

19 MR. EVERT: Well, you provided this in discovery,
20 yeah.

21 THE COURT: Hold on, y'all. Can you talk to me about
22 this.

23 MR. EVERT: So he -- yeah.

24 THE COURT: If it's not in effect, then it's not
25 relevant to show the witness.

1 MR. FINLAYSON: Okay.

2 THE COURT: And my concern is that you're not going
3 to tell the witness it's not in effect and you're going to get
4 the witness to -- I don't know. I don't know what your plan
5 to do is.

6 But we ought to -- if we know it's not in effect and
7 therefore not relevant, we ought not show it to the witness or
8 the jury.

9 MR. FINLAYSON: And she's already given me the
10 answer, so I don't want to die on the hill. I do -- I guess
11 I've got it -- maybe it was in my file from prior counsel. I
12 thought it had come from the government. I thought it was in
13 discovery.

14 THE COURT: Okay.

15 MR. EVERT: We may have provided old -- numerous
16 copies of the regulations, but these -- these are available
17 online.

18 THE COURT: Okay. All right. So what do you want to
19 do? Are you done with her then?

20 MR. FINLAYSON: I'm done with her.

21 THE COURT: We'll call her back in and we'll bring
22 them back in.

23 But y'all keep in mind redirect and recross are
24 supposed to get narrower to what's been brought up, not what
25 you didn't cover the last time. Okay?

1 I'm not such a stickler about it, because I want you
2 to try your case, but we ought to be moving that way. Okay?

3 MR. EVERT: Understood.

4 THE COURT: All right. Why don't you bring them in.

5 And why doesn't somebody grab Ms. Drake. Ms. Drake,
6 is that her name?

7 MS. CONNORS: Ms. Drake, yes.

8 MR. FINLAYSON: I guess I will -- actually, I will
9 ask her one question, Judge.

10 THE COURT: Okay.

11 MR. FINLAYSON: I'm not going to use -- okay.

12 COURTROOM SECURITY OFFICER: All rise.

13 (Whereupon, the witness entered the courtroom.)

14 (Whereupon, the jurors entered the courtroom.)

15 THE COURT: All right. Y'all can be seated.

16 Go ahead, sir.

17 FURTHER CROSS-EXAMINATION

18 BY MR. FINLAYSON:

19 Q. Just one last question, ma'am. And I want to confirm. If
20 someone -- they were told when they get the loan, if somebody
21 uses PPP funds for an unauthorized purpose, SBA will direct
22 you --

23 MR. EVERT: Objection.

24 THE COURT: Let him finish the question.

25

1 BY MR. EVERT:

2 Q. SBA will direct you to repay the loan or repay the
3 amounts?

4 THE COURT: Basis for the objection?

5 MR. EVERT: Relevance.

6 THE COURT: You can ask it a different way.

7 MR. FINLAYSON: They were --

8 THE COURT: You can ask him what he was told or you
9 can ask him what's in a document or something like that, but
10 you just can't ask abstractly what somebody was told, unless
11 she knows. I don't know.

12 BY MR. EVERT:

13 Q. Or what the policy was, would the policy for the program,
14 people were told if you use it for something else, you're
15 going to have to repay it? Is that fair or true?

16 A. I don't know what lenders told applicants. But SBA's
17 direction to lenders, that it was supposed to be used for the
18 intended purpose. Because we had other loan programs.

19 And I'll give you an example. Our 7A loan program
20 during the same CARES Act had another loan if you were a
21 business getting a loan, the first six months of your payments
22 were made for you by SBA. So there were other loan programs
23 available for businesses that did not intend to use the
24 proceeds for the intended purposes.

25 Q. Okay. So is it your testimony -- let me ask it this way.

1 There was a policy put out there by SBA or the
2 government that if the loan was used for something
3 different --

4 MR. EVERT: Objection.

5 THE COURT: Let him finish the question.

6 BY MR. EVERT:

7 Q. -- they have to -- they have to repay the loan, right?

8 MR. EVERT: Objection.

9 THE COURT: Basis?

10 MR. EVERT: Relevance as what we discussed at the --

11 THE COURT: Sustained. This issue has been gone over
12 quite at length.

13 MR. FINLAYSON: Okay. We're good. Thank you.

14 THE COURT: Oh, all done? Okay. You can step down.
15 Thank you very much.

16 THE WITNESS: Thank you.

17 THE COURT: I hope you have a nice day.

18 THE WITNESS: You, too. Thank you.

19 COURTROOM SECURITY OFFICER: Watch your step.

20 THE WITNESS: Thank you.

21 THE COURT: All right. Call your next witness.

22 MR. EVERT: The government calls Kelli Carpenter.

23 - - -

24 KELLI CARPENTER,

25 A witness herein, having been first duly sworn, was examined

1 and testified as follows:

2 - - -

3 COURTROOM DEPUTY: Thank you.

4 For the record, will you please state and spell your
5 first and last name?

6 THE WITNESS: My name is Kelli Carpenter. It's
7 K-E-L-L-I, C-A-R-P-E-N-T-E-R.

8 COURTROOM DEPUTY: Thank you.

9 DIRECT EXAMINATION

10 BY MR. EVERT:

11 Q. Good morning, Ms. Carpenter.

12 A. Good morning.

13 Q. Where do you work?

14 A. I work for JPMorgan Chase.

15 THE COURT: Pull that microphone a little closer or
16 scoot up and really project.

17 And we've all been telling everybody to talk slowly.
18 Okay?

19 THE WITNESS: Okay.

20 THE COURT: We have to take it all down. Thanks.

21 BY MR. EVERT:

22 Q. And how long have you been -- is JPMorgan Chase also known
23 as Chase?

24 A. Yes.

25 Q. I'll refer to it as Chase, so we can know that we're

1 talking about the same entity?

2 A. Yes.

3 Q. All right. So have you -- how long have you been with
4 Chase?

5 A. Total time of about ten years.

6 Q. Can you please walk me through the roles that you've had
7 at Chase?

8 A. Absolutely. I was hired as an SBA eligibility officer
9 about 12 years ago.

10 I briefly left the firm for about 15 months to work
11 as an underwriter at another lender.

12 And then I returned 15 months later as the manager of
13 a team that I had been a part of as an SBA credit manager.

14 Then I moved, about three and a half years later, to
15 our risk team, to manage our SBA national underwriting team
16 for about five and a half years.

17 And then about seven months ago, I moved back to our
18 SBA solutions team to manage the entire team that I had been a
19 part of.

20 Q. And in the roles that you've had at Chase, did you have
21 personal involvement with the Paycheck Protection Program or
22 the PPP?

23 A. Yes.

24 Q. How were you involved with the PPP?

25 A. It was part of when I was part of the risk organization, I

1 managed a team of credit officers that reviewed the
2 applications and I also reviewed them myself.

3 Q. And so you personally reviewed loans; is that correct?

4 A. I personally reviewed PPP applications, yes.

5 Q. And I believe you mentioned you had a managerial role.

6 Can you explain what your role was with respect to
7 the team that was working on the PPP --

8 A. Yes.

9 Q. -- issue?

10 A. I had 12 credit officers that reported to me that were
11 also reviewing PPP applications.

12 Q. So with respect to the PPP program more broadly, what was
13 Chase's role specifically?

14 A. So the program was designed for the lenders to review and
15 approve the applications in conjunction with the SBA and the
16 Treasury Department for assistance in getting the funds out
17 more quickly.

18 Q. And so you can sort of explain the dynamic between Chase
19 and the SBA as it related to a given PPP loan?

20 A. So the lenders were required to do a good-faith review of
21 the application in a reasonable amount of time. And the SBA
22 provided 100 percent guarantee on those loans, so if there was
23 a default, the bank would be repaid in whole for that loan.

24 Q. So even though the PPP is an SBA program, who was actually
25 putting up the money for the loan?

1 A. The lenders did the funding.

2 Q. So in this case, in the case where Chase was the lender,
3 it would have been Chase's money that was going out to the --
4 to the applicant?

5 A. Correct.

6 Q. So if a PPP applicant wanted to get a loan through Chase,
7 what was the process for how that would work?

8 A. So in 2021, applicants accessed a portal after they had
9 logged into their Chase business account. So they were
10 required to be a Chase client and when they logged into their
11 account, they could see a link to digitally apply for a
12 PPP loan.

13 Q. And when -- when an individual clicked the link to apply
14 for a PPP loan, what would -- what would happen next?

15 A. So there was different questions and information that
16 would be provided as part of that application that was based
17 on the information in the SBA forms required to be used to
18 analyze, you know, the application.

19 Q. And were there requirements for what had to be included in
20 a PPP application?

21 A. Yes, based on the SBA form, there were certain data
22 elements that had to be in each of the applications for it to
23 proceed.

24 Q. And who set those requirements for what had to be included
25 as part of the SBA -- as part of an application?

1 A. The SBA did.

2 Q. And what type of information did the SBA require to be
3 part of the application for a PPP loan?

4 A. So like the name of the business, their origination date,
5 number of employees, your average monthly payroll. There were
6 certifications that were required, certain questions that had
7 to be addressed by the applicant.

8 Q. And was there additionally documentation that had to be
9 provided by the applicant?

10 A. Correct, yeah. So there was payroll information that had
11 to be required as well as documentation that they were in
12 business as of the beginning of the pandemic, which SBA
13 established February 15th, 2020, as that like cutoff date that
14 that was what they set as the eligible date.

15 Q. And could the documentation that a given business provided
16 to Chase in support of the loan have varied from loan to loan?

17 A. Absolutely.

18 Q. But it had to establish those things that you just
19 mentioned, the eligibility, the eligibility for the loan?

20 A. Correct.

21 Q. Did Chase have any additional requirements that it made
22 businesses meet?

23 A. No.

24 Q. Are you familiar with a Chase customer called
25 Kremkov Industries?

1 A. Yes.

2 Q. Did Kremkov Industries apply for a PPP loan from Chase?

3 A. Yes.

4 Q. Did Chase ultimately give Kremkov Industries a PPP loan?

5 A. Yes.

6 Q. What was the size of the loan -- of the PPP loan that
7 Chase gave to Kremkov Industries?

8 A. It was a little over 9,500,000.

9 Q. And are you familiar with a Chase customer named
10 Carl Torjagbo now known as Karl Delano?

11 A. Yes. He was the owner, stated owner on the application.

12 Q. On Kremkov Industries' application?

13 A. Correct.

14 Q. And what was his role with respect to the PPP loan
15 application?

16 A. So he was the authorized person from the company that
17 applied for the PPP loan.

18 Q. And in your binder, there are government exhibits that --
19 that -- there are documents that have been marked for
20 identification as Government's Exhibits 101, 101A. I believe
21 it's that open binder that should be near the front.

22 101, 101A, 101B, 101C, 102, 102A, 103, 103A, 104,
23 105, 106, 107, 108, 310 and 310A, do you recognize these
24 documents? I know it's a lot of them.

25 A. This is -- 101 is an application, so it has the SBA form,

1 so yes, I do.

2 Q. I can provide them -- I've got them in folders here if
3 that's easier.

4 A. Okay.

5 Q. And I'll just ask you, are these Chase business records
6 relating to Kremkov Industries and Carl Torjagbo?

7 A. Yes.

8 Q. And have -- have you reviewed these records in preparation
9 for your testimony today?

10 A. Yes.

11 MR. EVERT: I would move to admit Government's
12 Exhibits 101, 101A, 101B, 101C, 102, 102A, 103, 103A, 104,
13 105, 106, 107, 108, 310 and 310A.

14 MR. FINLAYSON: Is 108 the call, the recording?

15 MR. EVERT: Yes.

16 MR. FINLAYSON: No objection.

17 THE COURT: 101 is already admitted; is that right?

18 MR. EVERT: Oh, I apologize. Yes, 101 is already
19 admitted, correct.

20 THE COURT: Other than that, they're all admitted and
21 may be published.

22 MR. EVERT: All right. If we could pull up
23 Government's Exhibit 101 on the screen, please.

24 BY MR. EVERT:

25 Q. What is this?

1 A. This -- this is the PPP application form.

2 Q. And was this submitted to Chase?

3 A. Yes.

4 Q. And pages -- what are Pages 1 to 4 of this form?

5 A. So the first page, the top identifies the business and the
6 requested amount, the intended use of funds and the ownership.
7 And then there are questions that determined eligibility as
8 well as certifications.

9 Q. And who -- who created this form?

10 A. This is an SBA form.

11 Q. And who filled out the information in this form?

12 A. The applicant.

13 Q. Was this included for every PPP application?

14 A. Yes.

15 Q. Why was this included as part of the application process?

16 A. It was required by the SBA.

17 Q. And at the top of Page 1 below where it says business
18 legal name, can you please read what it says?

19 A. Kremkov Industries, LLC.

20 Q. So this was Kremkov Industries, LLC's application for a
21 PPP loan?

22 A. Correct.

23 Q. Turning to Page 2, if we could look at the bottom of the
24 page, and it will get pulled up on your screen.

25 Can you -- where -- where it says signature of

1 authorized representative of applicant, whose name appears
2 there?

3 A. Carl Torjagbo.

4 Q. And right next to the signature is a date. Could you
5 please read that date?

6 A. 2/16/2021.

7 Q. So is that the date when this application was submitted?

8 A. Correct.

9 Q. Two paragraphs above Carl Torjagbo's name, can you please
10 read where it says the -- can you please read the paragraph
11 beginning where it says, I further certify?

12 A. I further certify that the information provided in this
13 application and the information provided in all of the
14 supporting documents and forms is true and accurate in all
15 material respects. I understand that knowingly making a false
16 statement to obtain a guaranteed loan from the SBA is
17 punishable under the law.

18 Q. And you can stop there. We don't have to -- it's a long
19 paragraph. So whose initials are next to that statement?

20 A. CT, which is --

21 Q. And?

22 A. -- Carl's.

23 Q. And turning back to Page 1, in the middle of the page, it
24 says -- where it says applicant ownership, it's this middle --
25 middle box here or third box down. Yeah, perfect.

1 A. Yeah. So Carl Torjagbo is listed as 100 percent owner on
2 the form.

3 Q. Is there any mention of someone named Michael Lee having
4 an ownership stake in Kremkov Industries?

5 A. No.

6 Q. Now, if we can go out of this and look at the top
7 right-hand corner. It says year of establishment. Can you
8 please read the date there?

9 A. 12/31/2014.

10 Q. And now why did it matter what year the business had been
11 established?

12 A. So to be eligible for a PPP loan, you had to have already
13 been established and in operation as of 2/15/2020.

14 MR. EVERT: And if we could please turn to Page 2.
15 And then middle -- middle part of the page. Yeah, great.

16 BY MR. EVERT:

17 Q. And then it says the authorized representative of the
18 applicant must certify in good faith to all of the below by
19 initialing next to each one. Can you please read the first
20 item on that list?

21 A. The applicant was in operation on February 15th, 2020, has
22 not permanently closed, and was either an eligible
23 self-employed individual, independent contractor or sole
24 proprietorship with no employees, or had employees for whom it
25 paid salaries and payroll taxes or paid independent

1 contractors as reported on Form 1099 miscellaneous.

2 Q. Was it important to Chase that -- and, sorry, whose --
3 whose initials are next to that statement?

4 A. CT.

5 Q. And is that Carl Torjagbo?

6 A. Yes.

7 Q. Now known as Karl Delano?

8 A. Yes.

9 Q. Was it important to Chase that Kremkov Industries was, in
10 fact, in operation on February 15th of 2020?

11 A. It was a requirement of the program, yeah.

12 Q. If Chase had known that Kremkov Industries was not really
13 in operation on February 15th of 2020, would this loan have
14 been approved?

15 A. No.

16 Q. And turning back to Page 1, where it says in the top
17 right-hand corner applicant including affiliates, if
18 applicable, meets size standard. Can you please read the box
19 that is checked?

20 A. No more than 500 employees.

21 Q. And was there a maximum number of employees that a
22 business could have in order to be eligible to get a PPP loan?

23 A. There were multiple size standards that were allowable,
24 the two lower boxes relate to SBA size standards, but
25 employees was one measurement as well.

1 Q. And if this box was checked, did that mean that the
2 applicant was certifying that it qualified based on this first
3 criteria being the no more than 500 employees?

4 A. Correct.

5 Q. And then on the bottom of the -- on the bottom half of the
6 page, we have a payroll calculation -- we'll have a payroll --

7 MR. EVERT: A little further up. Sorry. Yeah.

8 BY MR. EVERT:

9 Q. We have a payroll calculation, correct?

10 A. Yes.

11 Q. And we're going to talk a lot more about that. But it
12 says -- then in the next section down, it says -- on the
13 bottom half of the page, could you please read Question Number
14 7.

15 A. Is the United States the principal place of residence for
16 all employees included in the applicant's payroll calculation
17 above.

18 Q. What is your understanding as to why the application asked
19 this question?

20 A. So employees that resided outside of the United States
21 were not eligible to be included in the program for their
22 calculation.

23 Q. And what is the response to this question on this -- on
24 Kremkov Industries' form?

25 Oh, sorry. I guess we'll have to zoom out.

1 A. Yes. It's yes.

2 Q. It's yes, okay.

3 And if the answer to that question had been no, would
4 Chase have approved the loan to Kremkov Industries?

5 A. No.

6 Q. So was it important to Chase that the principal place of
7 residence for the 493 employees of Kremkov Industries that
8 were used in calculating the payroll was, in fact, the
9 United States?

10 A. Yes, as a determined eligibility by SBA policy.

11 Q. If the applicant had, for example, 492 employees in the
12 United States but just one employee was only in Ghana, would
13 it have been correct to say yes in response to this -- in
14 response to this question?

15 A. No.

16 Q. By putting 493 as the number of employees, was the
17 applicant attesting to the bank that all 493 employees reside
18 in the United States?

19 A. Yes.

20 Q. And I will just pull up that average monthly payroll
21 again. And the number of employees next to average monthly
22 payroll is 493; is that correct?

23 A. Correct.

24 Q. All right. And then looking at this box, in the middle of
25 the page it says average monthly payroll. Can you please read

1 that amount?

2 A. \$3,821,770.

3 Q. And would that figure have been inputted by the applicant?

4 A. Yes.

5 Q. In this case, Carl Torjagbo, now known as Karl Delano?

6 A. Yes.

7 Q. And was it important to Chase that the number accurately
8 reflected the average monthly payroll that Kremkov Industries
9 had for Kremkov Industries' employees in the United States?

10 A. Yes.

11 Q. In the next box over, it says times 2.5 plus EIDL equals
12 loan request amount; is that correct?

13 A. Yes.

14 Q. Can you explain what that means?

15 A. So the loan amount was based on two and a half times the
16 monthly average payroll. There was an ability to also
17 refinance EIDL loans within the PPP program, if they chose.

18 Q. And can you please read the figure that's -- that's there?

19 THE COURT: What's EIDL? Could we --

20 BY MR. EVERT:

21 Q. Oh, yes. What -- what is EIDL?

22 A. So EIDL was a direct program from the SBA where they
23 funded those loans direct to the applicants themselves.

24 Q. Got it. And if you're looking at this figure here, is --
25 can you please read that number?

1 A. \$9,554,425.

2 Q. And is 2.5 -- can -- can you do the math of --

3 A. Yes. It's two and a half times.

4 Q. It's two and a half times that \$3 million number?

5 And is that the size of the loan that Kremkov
6 Industries got from Chase?

7 A. Correct.

8 Q. That \$9,554,425 number?

9 So how was the amount of this loan calculated?

10 A. The program was based on the two and a half times the
11 average monthly payroll. That was the maximum amount
12 allowable for each business.

13 Q. Was this loan based in any way on the amount of the income
14 that Kremkov Industries had?

15 A. No.

16 Q. Was it based on Kremkov Industries' revenue?

17 A. No.

18 Q. If -- if -- strike that.

19 If JPMorgan Chase had known that Kremkov did not in
20 fact have an average monthly payroll of \$3,821,770 for
21 U.S. employees, would it have approved the loan?

22 A. No.

23 Q. Was it important to Chase that that \$3 million --
24 \$3.8 million number was, in fact, accurate?

25 A. Yes.

1 Q. If Chase had known that Kremkov's average monthly payroll
2 to employees who resided in the United States was zero
3 dollars, how much of a loan would Kremkov have received?

4 A. Zero.

5 Q. So let's look at the next box down on Page 1. It says
6 purpose of the loan, select all that apply. Can you please
7 read the boxes that are checked?

8 A. Payroll costs, rent/mortgage interest, utilities, covered
9 operation expenditures, covered property damage and covered
10 worker's protection expenditures.

11 Q. And then on Page 2, if you could please read the third
12 attestation down starting with "the funds will be used."

13 A. The funds will be used to retain workers and maintain
14 payroll or make payments for mortgage interest, rent,
15 utilities, covered operation expenditures, covered property
16 damage costs, covered supplier costs, and covered worker
17 protection expenditures as specified under the Paycheck
18 Protection Program rules.

19 I understand if the funds are knowingly used for
20 unauthorized purposes, the federal government may hold me
21 legally liable such as for charges of fraud.

22 Q. And whose initials are next to that statement?

23 A. CT.

24 Q. And is that Carl Torjagbo?

25 A. Yes.

1 Q. Why was this attestation required?

2 A. So there were multiple certifications provided as part of
3 the application, this one specifically is around the use of
4 the funds.

5 Q. And was it important to Chase that the funds from the
6 PPP loan be used for authorized purposes?

7 A. Yes.

8 Q. If Chase had known that the proceeds of the loan were
9 going to be used to buy a personal residence for Karl Delano,
10 would it have approved the loan?

11 A. No.

12 Q. If Chase had known that the proceeds of the loan were
13 going to be used to buy luxury vehicles for Karl Delano, would
14 it have approved the loan?

15 A. No.

16 Q. If Chase had known that the proceeds of the loan were
17 going to be used to put the down payment on a yacht, would it
18 have approved the loan?

19 A. No.

20 MR. FINLAYSON: Objection, Your Honor. Objection.
21 These questions all assume facts not in evidence.

22 THE COURT: Okay. Remember questions are not
23 evidence, right? So the question was if these things
24 occurred, would this be okay. So it's a hypothetical
25 question. But it doesn't imply that those things occurred.

1 Is that appropriate?

2 MR. FINLAYSON: Yes, sir. Thank you.

3 THE COURT: Okay. Do you understand that? So if
4 these things were used for -- what was your question?

5 MR. EVERT: I believe the last question that drew the
6 objection was if the -- if Chase had known that the proceeds
7 of the loan were going to be used to put the down payment on a
8 yacht --

9 THE COURT: Okay.

10 MR. EVERT: -- would the -- would it have been
11 approved.

12 THE COURT: So the witness can answer that question
13 as to whether or not that would have been approved. That
14 doesn't mean the money was used for that purpose. If that's
15 the case, maybe we'll hear about it later, okay?

16 But don't assume it was used because of a
17 hypothetical. But I think you probably get that it was a
18 hypothetical question.

19 Okay. Go ahead.

20 BY MR. EVERT:

21 Q. If Chase had known that the proceeds of the loan were
22 going to be used to start a new business, would it have
23 approved the loan?

24 A. No.

25 Q. Did Mr. Delano ever tell Chase that he was going to use

1 the proceeds of the loan to start a trucking and logistics
2 company?

3 A. No.

4 Q. And one certification above that one, the second one down,
5 can you please read that?

6 A. Current economic uncertainty makes this loan request
7 necessary to support the ongoing operations of the applicant.

8 Q. If a company was able to pay its employees \$45 million in
9 2020, would that suggest that the loan was necessary to
10 support its ongoing operations?

11 A. Yes.

12 Q. It could suggest that?

13 A. It could.

14 Q. Okay. Were the -- were the -- were the proceeds of a
15 PPP loan allowed to be used to support non-U.S. operations of
16 a business?

17 A. No.

18 Q. If Kremkov Industries did not have any operations in the
19 United States, would it have been important to Chase to know
20 that?

21 A. Yes.

22 Q. If Chase had known that Kremkov Industries did not have
23 any operations in the United States, would it have approved
24 the loan?

25 A. No.

1 Q. Were applicants required to submit any documentation with
2 their loan application?

3 A. Yes.

4 Q. What type of verification were lenders required to do with
5 respect to that documentation?

6 A. It was a good-faith review according to the SBA policy in
7 a reasonable amount of time. So there was a cursory review of
8 documents to see if they generally aligned with the
9 application.

10 Q. Were lenders allowed to rely on the information in the
11 loan application as true?

12 A. Yes, based on the certifications provided by the
13 applicant.

14 Q. Was there any requirement that the lender call the
15 applicant to verify the information in this application?

16 A. No.

17 Q. Was there any requirement that the lender check with the
18 IRS to see if the taxes that an applicant claimed to have paid
19 were, in fact, paid?

20 A. No.

21 Q. Is the level of review that Chase did when approving
22 PPP loans the same as what it does when it approves regular
23 non-PPP loans?

24 A. Absolutely not.

25 Q. Can you explain why this difference exists or existed?

1 A. The SBA designed the program due to the urgency of getting
2 the funds out to the applicant businesses for there not to be
3 the due diligence checks that are existing in traditional
4 lending as that often takes, you know, multiple weeks to be
5 able to fund a loan. So that would not have been timely
6 enough to address the concerns around the pandemic.

7 Q. And was that dictated by the SBA or was that Chase's
8 decision to do that type of verification for PPP loans?

9 A. That was SBA's policy on the program. It was their rules
10 and regulations around the payment protection program.

11 Q. And you mentioned that there was a -- there was a more
12 in-depth process for non-PPP loans. Did they have to go
13 through an underwriting process?

14 A. PPP loans did not. Traditional loans do, yes.

15 Q. And so when -- what does the underwriting process of a
16 traditional loan entail?

17 A. Typically, you know, credit reports, potentially cash flow
18 analysis, due diligence checks that are -- were not part of
19 the PPP program.

20 Q. And if a defendant -- or if the defendant had wanted a
21 conventional non-PPP loan, in order to start a new business,
22 would he have had to go through a different process than the
23 one he went through to get his PPP loan?

24 A. Yes.

25 Q. And I believe you just described that process, but on a

1 high level, how would that process have been different?

2 A. Credit reports were -- are a fundamental part of our
3 underwriting process as well as more financial information and
4 doing due diligence checks as well.

5 Q. And so would those -- you mentioned that it -- for a
6 PPP loan, there were certifications that -- made by the
7 applicant that -- that the -- that Chase was allowed to rely
8 on.

9 Would that be the case for a traditional loan, would
10 Chase just rely on certifications by an applicant?

11 A. No.

12 Q. So was the loan that Kremkov Industries received ever
13 converted into a non-PPP loan -- a traditional non-PPP loan?

14 A. No.

15 Q. Was Kremkov's loan ever anything other than a PPP loan?

16 A. No.

17 Q. Did Karl Delano, formerly known as Carl Torjagbo, ever
18 submit any documentation to support the assertion that
19 Kremkov Industries had an average monthly payroll of
20 approximately \$3.8 million?

21 A. Yes.

22 Q. What -- what did he submit?

23 A. There were 941 forms, which are quarterly tax statements
24 that were provided for all four quarters of 2020. He also
25 provided a payroll document and a personal tax return and the

1 940 form, which is the annual tax statement as well.

2 Q. Without that documentation, would the loan have been
3 approved?

4 A. No.

5 Q. Did Chase rely on the supporting documentation provided by
6 Mr. Delano in order to approve the loan?

7 A. Yes, we used the 941 forms.

8 Q. Did tax documents submitted in support of the PPP loan
9 have to have actually been submitted to the IRS?

10 A. Yes.

11 Q. If Chase had known that the information in the supporting
12 documents was untrue, would it have approved the loan?

13 A. No.

14 Q. Turning to Page 10, if we could look at this. What is
15 this document?

16 A. This document is the February payroll statement for 2020.

17 Q. For Kremkov Industries?

18 A. For Kremkov, yes.

19 Q. And who submitted this?

20 A. Karl did, along with his other application forms.

21 Q. And turning to Page 80, where it says grand totals. What
22 the is the grand total for --

23 MR. EVERT: And if we could just zoom in on the one
24 above as well so we get the names of the -- the names of the
25 columns.

1 BY MR. EVERT:

2 Q. So what is the grand total for Kremkov Industries'
3 purported monthly pay for February of 2020?

4 A. \$3,901,665.45.

5 Q. And then looking at the next column over, how much did
6 Kremkov Industries purportedly withhold in federal taxes in
7 February of 2020?

8 A. \$433,043.27.

9 Q. And would that money have gone to the IRS?

10 A. Yes.

11 Q. And the next column over, how much did Kremkov Industries
12 purportedly withhold in Social Security taxes in February of
13 2020?

14 A. \$241,902.91.

15 Q. And would that money have gone to the Social Security
16 Administration?

17 A. Correct.

18 Q. All right. Let's move on to the next document, Page 81.
19 What does this document purport to be?

20 A. This is the Kremkov Industries' annual payroll statement
21 for all of 2020.

22 Q. And who submitted this document?

23 A. Karl did.

24 Q. And turning to Page 122, where it says the grand totals,
25 what was the grand total that Kremkov Industries purportedly

1 paid to its employees for the tax year of -- for the year of
2 2020?

3 A. \$45,861,255.93.

4 Q. And then looking at the next column over, how much did
5 Kremkov Industries purportedly withhold in federal taxes from
6 its employees' pay in 2020?

7 A. \$5,096,786.12.

8 Q. And would that money have gone to the IRS?

9 A. Correct.

10 Q. The next column over, how much did Kremkov Industries
11 purportedly withhold in Social Security taxes in February of
12 20820?

13 A. \$2,843,396.26.

14 Q. And would that money have gone to the Social Security
15 Administration?

16 A. Correct.

17 Q. If Chase had known the people listed in these payroll
18 documents did not actually work for Kremkov Industries, would
19 it have approved the loan?

20 A. No.

21 Q. If Chase had known that the information about Kremkov's
22 federal tax and Social Security withholdings was not true,
23 would it have approved the loan?

24 A. No.

25 Q. Now, turning to Page 123, I believe you mentioned a number

1 of tax documents. Who -- is this the start of where the tax
2 documents begin in this form?

3 A. Yes.

4 Q. And who -- who submitted these?

5 A. Karl did. Karl Delano/Torjagbo.

6 Q. If the tax documents were -- were -- if tax documents -- I
7 believe you testified earlier that if tax documents were
8 submitted in connection with a PPP loan, those had to have
9 been real tax documents that were filed with the IRS, correct?

10 A. Yes.

11 Q. If Chase knew that the tax documents had not actually been
12 filed with the IRS, would it have approved the loan?

13 A. No.

14 Q. Was it important that the information in the tax documents
15 was accurate?

16 A. Yes.

17 Q. If Chase had known that there was inaccurate information
18 in the tax documents provided for Kremkov Industries and for
19 Mr. Delano, would -- would it have approved the loan?

20 A. No.

21 Q. So turning to Page 125, what is this?

22 A. This is Carl's personal tax return, the 1040 form from
23 2020.

24 Q. And the name is Carl Torjagbo; is that correct?

25 A. Yes.

1 Q. And could you read the Social -- the last four digits of
2 the Social Security number?

3 A. 0540.

4 Q. And is Carl Torjagbo the person who submitted this in
5 connection with the PPP application?

6 A. Yes.

7 Q. What year is this for?

8 A. 2020.

9 Q. Now, Item 1 on this form in the -- in the bottom right
10 here, it's -- what is he saying his wages, salaries and tips
11 is for -- for the year 2020?

12 A. \$9,199,411.

13 Q. And Item 8 is other income from Schedule 1, Line 9. What
14 does he say that his other income was?

15 A. A negative \$9,099,360.

16 Q. And so then one line down, what is he saying his total
17 income is?

18 A. A negative \$799,949.

19 Q. And then turning ahead to Page 129. I believe you
20 mentioned there were some numbers in the negative. What --
21 what are the source -- what is the source of that -- of that
22 negative number, Item Number 28 above here?

23 A. That is Kremkov Industries.

24 Q. Just the thing above that.

25 MR. EVERT: Can you zoom?

1 BY MR. EVERT:

2 Q. And what's the EIN number there ending in?

3 A. 7540.

4 Q. And let's turn ahead to Page 132. What is this document?

5 A. That's the Georgia tax return, annual tax return.

6 Q. And looking at your first name and your last name, who --
7 who is this -- who is this for?

8 A. This is Carl Torjagbo's Georgia return for 2020.

9 Q. And Item Number 4 says residency status. And then there's
10 a 1 next to it. What does that mean?

11 MR. EVERT: If we can zoom in on that.

12 BY MR. EVERT:

13 Q. And there's a little code beneath the Item Number 4.

14 A. Full year resident is number one.

15 Q. So does that mean he was a full year resident of Georgia
16 in 2020?

17 A. Correct.

18 Q. Turning to Page 141. What is this? Or just -- I guess I
19 would just ask one more question on that.

20 Any -- any indication that he lived in Texas on that,
21 on that Georgia tax return?

22 A. No.

23 Q. Turning to Page 141, what is this?

24 A. This is the quarterly tax statement 941s for the first
25 quarter of 2020.

1 Q. And what company is this for?

2 A. Kremkov Industries.

3 Q. And what -- what are the months that this -- that this
4 document covers?

5 A. January, February and March.

6 Q. Of 2020?

7 A. Correct.

8 Q. And can you please read item Number 1 below?

9 A. Number of employees, 493.

10 Q. So this is saying that he had had 493 employees in
11 January, February and March of 2020?

12 A. Correct.

13 Q. And can you please read Item Number 2?

14 A. Wages, tips and other compensation.

15 Q. And it's \$11,366,813.09; is that correct?

16 A. Correct.

17 Q. And then there's federal income tax withheld from wages
18 and compensation.

19 How much did Kremkov Industries purportedly withhold
20 in federal income tax in the first quarter of 2020?

21 A. \$1,316,144.46.

22 Q. And turning to Page 142, who is this signed by?

23 A. Carl Torjagbo.

24 MR. EVERT: Let's turn to Page 143. And we'll zoom
25 at the top there.

1 BY MR. EVERT:

2 Q. And is this Kremkov's -- Kremkov Industries' quarterly tax
3 return for the next quarter?

4 A. Correct.

5 Q. So April, May and June of 2020?

6 A. Correct.

7 Q. Then let's look at -- a little bit below Item Number 1.
8 How many employees did Kremkov Industries have -- purportedly
9 have in the second quarter of 2020?

10 A. 493.

11 Q. And did it pay them -- did it purportedly pay them
12 approximately \$11.4 million in quarter two of 2020?

13 A. That's correct.

14 Q. And did it purportedly withhold approximately \$1.3 million
15 in quarter 2 of -- sorry, strike that.

16 Did it purportedly withhold approximately
17 \$1.3 million in federal income taxes in quarter 2 of 2020?

18 A. Yes.

19 Q. And now let's turn to Page 145. And I'll ask you who
20 signed this document.

21 A. Carl Torjagbo.

22 Q. All right. Now let's turn to Page 146. Is this
23 Kremkov Industries' quarterly federal tax returns for the next
24 quarter?

25 A. Yes.

1 Q. What -- so what months is it for?

2 A. July, August and September.

3 Q. Of 2020?

4 A. Correct.

5 Q. And how many employees did Kremkov Industries purportedly
6 have?

7 A. 493.

8 Q. And did it purportedly pay them wages, tips and other
9 compensation of 13 -- about \$13.4 million?

10 A. Correct.

11 Q. And how much -- did it purportedly withhold approximately
12 \$1.5 million in federal taxes?

13 A. Correct.

14 Q. And then turning to Page 148. Would you please read who
15 signed this?

16 A. Carl Torjagbo.

17 Q. Let's turn to Page 149. Is this Kremkov Industries'
18 quarterly federal tax return for the next quarter, quarter 4
19 of 2020?

20 A. Correct.

21 Q. And how many employees did Kremkov Industries purportedly
22 have in October, November and December of 2020?

23 A. 493.

24 Q. And did it purportedly pay them wages, tips and other
25 compensation of about \$7.8 million?

1 A. Correct.

2 Q. And did it purportedly withhold about \$892,000 from -- in
3 federal income taxes from their -- from their pay?

4 A. Correct.

5 Q. And then turning to Page 151. Who signed this?

6 A. Carl Torjagbo.

7 Q. Let's turn to Page 152. What is this?

8 A. This is the annualized 940 form, so it adds all of those
9 941s together into one document.

10 Q. And looking at Item Number 3, can you please read what
11 that is.

12 A. Total payments to all employees.

13 Q. And what is the total payment to all employees?

14 A. \$45,861,255.93.

15 Q. And is that the same number as the total gross pay on
16 Page 122 that was reflected in those payroll journals that we
17 looked through earlier? We can -- we can check, too. That
18 should be Page 122.

19 A. Yes.

20 Q. Okay. So they're the same number?

21 A. They're the same number.

22 Q. And then -- and I've got a calculator for you there, if
23 you need it.

24 But is -- is 45 million, is that number divided by
25 12 -- would you do that number divided by 12, please. Could

1 you -- could you read your answer?

2 A. \$3,821,771.20.

3 Q. And looking at Page 1 of this document, of the
4 application, if you look at the average monthly payroll there,
5 is that about \$1 more than the average monthly payroll?

6 A. Correct.

7 Q. And then if we could go back to -- I'm sorry. The
8 document we were at earlier was -- well, was that other
9 document -- was the analyzed 1040, was that also signed by
10 Carl Torjagbo?

11 A. Yes.

12 Q. All right.

13 MR. EVERT: I think this would be a good point for a
14 break, if that works.

15 THE COURT: Okay. That's fine. How about our
16 mid-morning break, 10 minutes, maybe 12 minutes.

17 Okay?

18 Depending on if we've got things to talk about. And
19 we'll be back at that time.

20 Okay. Thank you.

21 COURTROOM SECURITY OFFICER: All rise.

22 (Whereupon, the jurors exited the courtroom.)

23 THE COURT: Okay. Anything y'all want to talk about?

24 MR. FINLAYSON: No, sir.

25 THE COURT: All right. We'll see you in about ten

1 minutes.

2 (Whereupon, a recess was taken.)

3 THE COURT: Okay. Ready?

4 MS. CONNORS: Yes, Your Honor.

5 MR. EVERT: Yes, sir.

6 MS. CONNORS: If I may, we realized we had one issue
7 with one exhibit in our system, so I'm going to need to be
8 able to go back and forth between my computer.

9 So after this witness is done, if you wouldn't mind
10 giving us just a couple of minutes to be able to switch out.

11 THE COURT: That's fine. Yes.

12 COURTROOM SECURITY OFFICER: Are you ready?

13 THE COURT: Yes.

14 COURTROOM SECURITY OFFICER: All rise.

15 (Whereupon, the jurors entered the courtroom.)

16 THE COURT: Okay. Y'all can be seated.

17 Are you done with your examination?

18 MR. EVERT: Oh, no.

19 THE COURT: Okay.

20 MR. EVERT: I didn't realize the be seated didn't
21 apply to me, but I'll -- I'll come up.

22 THE COURT: And we're going to go until about 12:30
23 before we have our lunch break. Is that all right with
24 everybody?

25

1 BY MR. EVERT:

2 Q. All right. So I believe you testified on direct that in
3 support of the PPP application for Kremkov Industries,
4 Mr. Delano submitted a number of documents, including payroll
5 logs, Tax Form 941s, Tax Form 940 and a personal tax return;
6 is that correct?

7 A. Yes.

8 Q. And all documents submitted in support of the loan
9 application had to be accurate; is that correct?

10 A. The applicants were required to certify the information
11 was true and accurate.

12 Q. And they -- they, in fact, attested to Mr. -- Mr. Delano,
13 formerly Torjagbo, in fact, attested to that in his
14 application, correct?

15 A. Correct.

16 Q. And so I believe you mentioned that Chase focused on the
17 941 to support the date of the business operations; is that
18 correct?

19 A. Yes.

20 Q. But all of the -- all of the documents had to be accurate;
21 is that correct?

22 A. Yes.

23 Q. And if any of the documents -- if Chase had known that any
24 of the information in any of documents was inaccurate, would
25 it have approved the loan?

1 A. No.

2 Q. Thank you.

3 MR. EVERT: So I'd like to put up Government's
4 Exhibit 101A, which is already in evidence.

5 BY MR. EVERT:

6 Q. And so what is -- what is this document?

7 A. This is a screenshot of our internal lending platform
8 called ApStar.

9 Q. And looking at -- what does this document reflect?

10 A. This indicates that Kremkov Industries applied digitally.
11 It has their contact information. It shows the SBA status is
12 approved. And it also has the date as being 2/19/21.

13 Q. And is that the date that the loan was approved?

14 A. Correct.

15 Q. And who -- and turning to Page 2, can you -- there is a
16 lengthy paragraph that provides a number of certifications
17 that the -- that the applicant made; is that correct?

18 A. This is specific to the lender certifications that are
19 required and they are based on the applicant's certifications.

20 Q. Got it. So it says the applicant has certified to the
21 lender that it was in operation on February 15th, 2020,
22 correct?

23 A. Correct.

24 Q. And the answer to that is?

25 A. Yes.

1 Q. Yes. And then there are a number of other certifications
2 as well as part of this document, correct?

3 A. Correct.

4 Q. Was it important to Chase that the answer -- that the
5 answers provided by the applicant to all of these questions
6 was accurate?

7 A. Yes. That was the design of the program, for the
8 applicant to provide the certifications of the information,
9 validity in the application.

10 Q. And turning to Page 3, could you please -- it should --
11 maybe it's Page 2. Oh, yeah. I'm sorry, yeah. The first
12 item, could you please read that?

13 A. The applicant has certified that the principal place of
14 residence for all employees included in the applicant's
15 payroll calculation is the United States.

16 Q. And what was the answer to that question?

17 A. Yes.

18 Q. If the answer had been no, would the loan have been
19 approved?

20 A. No.

21 Q. All right. Now I'm going to show you Government's
22 Exhibit 101B on the screen, please. This is already in
23 evidence. What does this document reflect?

24 A. This shows the ApStar ID, which is basically the
25 associated coding that identifies this application. It has

1 the timeline of the application being 2/16/2021. And then it
2 would have -- the far right shows the web session IP address
3 that was associated with that application.

4 Q. So the date, the TRX normalized date time, was that
5 reflect -- what does that reflect?

6 A. When the application was submitted.

7 Q. By the applicant to Chase?

8 A. Correct.

9 Q. And then the web session IP address, can you explain what
10 that is?

11 A. That's the applicant's IP address, so wherever they were
12 accessing the Chase systems, that would be their associated IP
13 address for their computer.

14 Q. Got it. And I know you're not an expert on IP addresses,
15 but could you just provide the jury just a very high level
16 what is -- what an IP address is?

17 A. Yeah. It's just an identifier to show the location of
18 like where your computer is located and how it's accessing the
19 systems.

20 Q. All right. And then -- and was February -- that
21 February 16th, 2021 date, was that the same date that was on
22 the application that we -- that we reviewed?

23 A. Yes, that's correct.

24 Q. And then was that the only PPP loan application that
25 Mr. Delano, formerly known as Mr. Torjagbo, submitted on

1 behalf of Kremkov Industries to Chase?

2 A. No.

3 Q. I'm showing you Government's Exhibit 102 which is already
4 in evidence. What is this?

5 A. This was the previous application that was provided on
6 February 9th.

7 Q. And so I -- you just answered my next question. But this
8 was provided -- this was submitted on February 9th; is that
9 correct?

10 A. Correct.

11 Q. If we go to Page 2, bottom of the page, same person
12 submitted this?

13 A. Correct.

14 Q. Karl Delano, formerly known as Carl Torjagbo?

15 A. Correct.

16 Q. And have you compared this application with the one that
17 was submitted on February 16th of 2021?

18 A. Yes.

19 Q. And that's the application that we already went over?

20 A. Correct.

21 Q. Were the two applications slightly different?

22 A. Minimally, yes.

23 Q. Yeah. Did the latter application -- the one -- the
24 February 16th one include a few additional documents?

25 A. Yes.

1 Q. But apart from these minor differences, were the two --
2 were the two submissions substantially the same?

3 A. Yes.

4 Q. And was this 2/9, this February 9th, 2021 application, was
5 that approved?

6 A. No.

7 Q. I'm showing you Government's Exhibit 102A, which is
8 already in evidence. And then is this the ApStar for the
9 2/9/2021 application?

10 A. Correct.

11 Q. And can you please read the -- the top of the page?

12 A. It was Kremkov Industries, LLC declined as of 2/16/2021.

13 Q. Is that the same date that the first PPP application that
14 we looked at was submitted?

15 A. Yes.

16 Q. So it was the second PPP application he applied for with
17 Chase Bank, but it was the first one we together looked at?

18 A. Correct.

19 Q. Okay. So is it correct that the same day his first
20 application was denied, he submitted the second application?

21 A. Yes.

22 Q. And that second application was the one that was
23 ultimately approved?

24 A. Correct.

25 Q. And then turning to Page 11, are you able to tell why

1 this -- why the first application was denied?

2 A. The reviewer was -- were looking for additional documents.

3 Q. Understood.

4 MR. EVERT: Can we please pull up 103, which is
5 already in evidence.

6 BY MR. EVERT:

7 Q. What are -- what are the -- what does Government 103
8 consist of?

9 A. This is a business signature card, which would be
10 associated with the checking account of Kremkov Industries.

11 Q. And at the top of Page 1, where it says date opened, can
12 you please read that date?

13 A. 1/25/2021.

14 Q. So that's the date that this account for
15 Kremkov Industries was opened?

16 A. Correct.

17 Q. And that's just a few weeks before Kremkov Industries
18 applied for the PPP loan; is that correct?

19 A. Yes.

20 Q. And then on Page 2, it says deposit and withdrawal
21 offeree -- deposit and withdrawal authorization and there is a
22 name below that. Can you please read the name? Yeah, it's
23 middle of the page, right before those lines. Yeah.

24 A. Carl Torjagbo.

25 Q. And were there any other names of individuals -- there was

1 obviously the name of Kremkov Industries. But were there any
2 names of any other individuals associated with this account?

3 A. No.

4 Q. So was anyone other than Carl Torjagbo authorized to
5 conduct transactions using this account?

6 A. No.

7 Q. Did someone named Michael Lee have the authority to
8 conduct transactions in this account?

9 A. No.

10 Q. And then on Page 3, does it indicate who the person who
11 opened the bank account on behalf of Kremkov Industries was?

12 A. Carl Torjagbo.

13 Q. Was this -- did Carl Torjagbo have an additional account
14 at Chase?

15 A. Yes.

16 Q. Was it a personal credit card account?

17 A. Yes.

18 Q. Are the statements for that account contained in
19 Government's Exhibit 310? We don't need to pull it up, but --

20 A. Yes.

21 MR. EVERT: So let's turn to Page 10 of Government's
22 Exhibit 103.

23 BY MR. EVERT:

24 Q. Can you please read the amount of the last deposit on that
25 page?

1 We may need to blow it up a little bit more.

2 A. \$9,554,425.

3 Q. And what is the source of that money?

4 A. The PPP loan.

5 Q. And what is the date of that deposit?

6 A. 3/29.

7 Q. Of 2021?

8 A. Correct.

9 Q. And so just a few weeks after the -- about -- I'm terrible
10 at math on the fly, but a handful of weeks after the loan
11 application, correct?

12 A. Correct.

13 Q. And then turning to Page 13, it says checks paid and then
14 amount \$3 million. What does that mean?

15 A. There was a check presented to this checking account for
16 \$3 million.

17 Q. And was the check going into the account or out of the
18 account?

19 A. Out of the account.

20 Q. And what is the date of that transaction?

21 A. 4/9/2021.

22 Q. And turning to Page 14. What is that?

23 A. That is an image of the check.

24 Q. And who is the check from?

25 A. Kremkov Industries.

1 Q. And is that from -- is it written off of
2 Kremkov Industries' Chase account?

3 A. Correct.

4 Q. And who is it written to?

5 A. Kremkov Industries.

6 Q. And what does it say on the for line of the check?

7 A. Payroll.

8 Q. So this is saying that the check is written for payroll?

9 A. Correct.

10 Q. And assuming that it had any payroll, could
11 Kremkov Industries have paid its payroll directly from its
12 Chase account?

13 A. Yes.

14 Q. Do other companies pay their payroll directly from their
15 Chase accounts?

16 A. Yes.

17 Q. Did Chase monitor the use of PPP funds on an ongoing
18 basis?

19 A. Yes.

20 Q. Why did it do that?

21 A. It's part of just normal regulation for all money movement
22 within banks.

23 Q. And on its face, would a check written for payroll using
24 PPP funds have raised any red flags for Chase?

25 A. No.

1 Q. If instead there was a \$1.6 million wire transfer to pay
2 for a home, would that have raised any red flags for Chase?

3 A. Yes.

4 Q. Why would that have raised red flags?

5 A. That was not an eligible use of proceeds for the
6 PPP loans.

7 Q. If instead there was a \$300,000 payment for a Lamborghini,
8 would that have raised any red flags for Chase?

9 A. Yes.

10 Q. Why?

11 A. Also not an eligible use of proceeds for PPP loans.

12 Q. What about a \$50,000 payment for a yacht, would that have
13 raised any red flags for Chase?

14 A. Yes.

15 Q. Why?

16 A. Also not eligible to be used for PPP funds.

17 Q. Was the \$9.5 million PPP loan issued to Kremkov Industries
18 one of the larger PPP loans that Chase issued?

19 A. Yes.

20 Q. Did there come a time when Chase began to question the
21 accuracy of the information that had been provided in the
22 PPP loan application that was submitted by the defendant?

23 A. Yes.

24 Q. Did those questions arise before or after the loan had
25 already been paid out?

1 A. After.

2 Q. Did those questions arise before or after the \$3 million
3 check was drawn off of the account?

4 A. After.

5 Q. Based on the questions that Chase had, did there come a
6 time when Chase froze Kremkov Industries' account at JPMorgan
7 Chase?

8 A. Yes.

9 Q. And does freezing an account just mean that the defendant
10 would have been prohibited from withdrawing funds from the
11 account?

12 A. Correct.

13 Q. And do you know when the account was frozen, off the top
14 of your head? If you don't, that's fine.

15 A. I don't remember.

16 Q. But it was after this \$3 million check?

17 A. Correct.

18 Q. Couldn't have -- couldn't have sent a check out of the
19 account -- couldn't have written a check for \$3 million if the
20 account was frozen, right?

21 A. That is correct.

22 Q. So as a result of the questions that Chase had, did it
23 require Kremkov Industries to provide any additional
24 information to establish that Kremkov Industries was, in fact,
25 in operation as of February 15th of 2020?

1 A. Yes.

2 Q. So I'm going to play Government's Exhibit 108, which is
3 already in evidence, but if we could just get a quick preview
4 of it so we can -- so you can provide the details on what it
5 is. And are you familiar with what Government's Exhibit 108
6 is?

7 A. Yes.

8 Q. What is it?

9 A. It's a recording of a complaint lodged due to the freezing
10 of the account and the inability to access the funds in that
11 checking account.

12 Q. And who -- who was calling to complain about the freezing
13 of the funds?

14 A. Carl Torjagbo.

15 Q. And do you know the date of this call?

16 A. May 7th, 2021.

17 Q. All right. So we'll play the call.

18 (Whereupon, the recording was played)

19 MR. EVERT: All right. So because nobody likes to be
20 on hold, let's skip ahead until the 15 minute and 14 seconds
21 mark.

22 (Whereupon, the recording was played)

23 MR. EVERT: All right. So we can end that there.

24 BY MR. EVERT:

25 Q. On this call, was Mr. Delano, formerly Mr. Torjagbo, and

1 the Chase representative discussing how he needed to submit
2 additional documentations about Kremkov Industries?

3 A. Yes.

4 Q. And was one of the documents he was told he could provide
5 an EIN letter dated before February of 2020?

6 A. Yes.

7 Q. Was another document he was told he could provide a bank
8 statement from another bank --

9 A. Yes.

10 Q. -- showing business activity?

11 A. Yes.

12 Q. And was another document he was told he could provide a
13 tax document that had been filed?

14 A. Yes.

15 Q. And all of that had to have been dated before February of
16 2020, correct?

17 A. Correct.

18 Q. And in response to this call, did Mr. Delano, in fact,
19 submit additional documents to Chase?

20 A. Correct.

21 Q. I'll show you Government's Exhibit 104, which is in
22 evidence.

23 And if you could please read the entry dated May 7th
24 of 2021.

25 A. EIN letter and tax returns scanned to KYC.

1 Q. And what is KYC?

2 A. Know your customer.

3 Q. And is that a department at Chase?

4 A. It's a federal regulation around authentication of
5 individuals and businesses.

6 Q. And February 7th of 2021, is that the same date as that
7 telephone call we just listened to?

8 A. Yes.

9 Q. And so the additional documentation that he provided, it's
10 an EIN letter and a tax return; is that correct?

11 A. Yes.

12 Q. Okay. So I'm showing you -- I'm going to show you
13 Government's Exhibit 106, which is already in evidence. What
14 is this?

15 A. That's an IRS EIN letter.

16 Q. So what is this letter -- you don't have to read it word
17 for word, but what is it -- what is it saying?

18 A. It is sent to businesses when they're applying for an EIN
19 number, which is tied to tax payments.

20 Q. And is this a notice from the IRS -- or does this purport
21 to be a notice from the IRS saying that a particular EIN was
22 assigned to Kremkov Industries?

23 A. Yes.

24 Q. So looking at the name at the top there, that says
25 Kremkov Industries, right?

1 A. Yes.

2 Q. And then date of the notice, can you please read that
3 date?

4 A. 9/1/2018.

5 Q. And then could you read the employer identification
6 number?

7 A. 83-182-1377.

8 Q. And I lost it. All right. All right. Can we turn to
9 Government's Exhibit -- so does this letter purport to show
10 that -- that that EIN number was issued to Kremkov Industries
11 on January -- on September 1st of 2018?

12 A. Correct.

13 Q. And this supposedly came from the IRS, right?

14 A. Yes.

15 Q. And Mr. Delano, formerly known as Mr. Torjagbo, submitted
16 this in an effort -- in response to the call about his account
17 being frozen?

18 A. Correct.

19 Q. Was the -- in order to get his account unfrozen?

20 A. Yes.

21 Q. All right.

22 MR. EVERT: And then let's turn to Government's
23 Exhibit 107, which is already in evidence. And we can zoom in
24 at the top there so we can read it a little bit better.

25

1 BY MR. EVERT:

2 Q. Was this also submitted by Mr. Delano?

3 A. Yes.

4 Q. In response to the call about needing to submit additional
5 documentation?

6 A. Yes.

7 Q. Because Kremkov Industries' account was frozen?

8 A. Correct.

9 Q. And what does this document purport to be?

10 A. Carl Torjagbo's personal tax return from 2020.

11 Q. And when was this -- when did he submit this to Chase?

12 A. 5/7/2021.

13 Q. Okay. And turning to Page 5, below where it says income
14 or loss from a partnership or S corporation, can you please
15 read the company on line A, just right up there.

16 A. Kremkov Industries.

17 Q. And what is the employer identification number identified
18 for Kremkov Industries on this form?

19 A. 83-182-1377.

20 Q. Okay. And did Karl Delano, formerly known as
21 Carl Torjagbo, submit -- also submit his 1040 as part of the
22 February 16th, 2021 PPP application?

23 A. Correct.

24 MR. EVERT: Let's pull up Government's Exhibit 101,
25 which is already in evidence, and pull that up side by side

1 with -- with this page. 125. Thank you. Perfect.

2 BY MR. EVERT:

3 Q. And so is this -- does this purport to be his 2020 -- the
4 2020 1040 for Carl Torjagbo?

5 A. Yes.

6 Q. So the one on the right is the one that he submitted in
7 connection with his February 16th loan application. And the
8 one on the left is the one he submitted when he was trying to
9 get his account unfrozen, correct?

10 A. Correct.

11 MR. EVERT: And then if we turn to Page 129 of 101,
12 so we're looking at the same page of what should be the same
13 document. Below the line, if we could blow up for both
14 documents Item 28.

15 BY MR. EVERT:

16 Q. So for document on the left, which is what was submitted
17 on May 7th, 2021, is the employee identification number
18 83-182-1377?

19 A. Correct.

20 Q. And for the document on the right, which is what he
21 submitted in January, on January 16th of 2021, is the
22 document -- is the employee identification -- employer
23 identification number for Kremkov Industries 86-134 -- sorry.
24 Is the employer identification number 86-134-7540?

25 A. Yes.

1 Q. So these are -- and when -- when documents were submitted
2 in connection with a PPP loan, they were supposed to be
3 documents that were actually filed with the IRS, right?

4 A. Yes.

5 Q. And so these are both supposed to be Carl Torjagbo's 2020
6 Form 1040, correct?

7 A. Correct.

8 Q. And are the EIN numbers submitted on these two different
9 forms, which were submitted on two different dates, the same?

10 A. No.

11 Q. So these are -- they're -- they're different EINs for
12 Kremkov on the two forms?

13 A. Correct.

14 Q. And did Government's Exhibits 106 and 107, which were the
15 exhibits we just discussed that were submitted on May 7th, did
16 those both purport to show that Kremkov Industries was in
17 operation as of February 15th of 2020?

18 A. Yes.

19 Q. Despite the submission of these additional documents, did
20 Chase ultimately freeze Kremkov's account?

21 Or, I'm sorry, did Chase ultimately unfreeze
22 Kremkov's account?

23 A. No.

24 Q. So did the document provide sufficient proof to show that
25 Kremkov Industries was, in fact, eligible for a PPP loan --

1 for the PPP loan that the bank had issued him?

2 A. No.

3 Q. Turning to Page 15 of Government's Exhibit 103. And
4 Government's Exhibit 103 is the bank records for
5 Kremkov Industries' Chase Bank account, correct?

6 A. Yes.

7 Q. So if we look at the other withdrawals --

8 MR. EVERT: Can we blow that up, please? Thank you.

9 BY MR. EVERT:

10 Q. So there's an entry -- or there's only one entry, and it's
11 dated 5/18. Can you describe what this is?

12 A. This is the amount of the funds that the bank clawed back
13 from the account.

14 Q. So it's -- and can you read the amount that the bank
15 clawed back?

16 A. \$6,554,515.

17 Q. And then the same date -- and the date, which is 5/18 of
18 2012, correct?

19 A. Correct.

20 Q. The daily ending balance that day, what was the balance?

21 A. Zero.

22 Q. So the bank clawed back all of the money in the account,
23 correct?

24 A. Correct.

25 Q. And what does it mean to clawback money?

1 A. Remove the money from the account.

2 Q. Why did Chase clawback the money?

3 A. Determined that the loan was not eligible.

4 Q. And on your -- and then showing you Government's
5 Exhibit 104, which is already in evidence. Turning to Page 3,
6 what is this?

7 A. This is an account closure letter.

8 Q. And what is the date of this letter?

9 A. August 10th, 2021.

10 Q. And can you please read the first three lines of this
11 letter, starting with important information.

12 A. Important information. We have decided to close your
13 account, Dear Kremkov Industries, LLC, after a recent review
14 of your account, we have decided to end our relationship with
15 you.

16 Q. Thank you. And was that the only account belonging to
17 Carl Torjagbo, now known as Karl Delano, that Chase decided to
18 close?

19 A. No.

20 Q. Turning to Government's Exhibit 310A, which is already in
21 evidence, what is this?

22 A. This is a screenshot from our customer assist program that
23 outlines relationship information.

24 Q. And does this relate to Mr. Delano's credit card with
25 Chase?

1 Q. Yes. It does.

2 Q. Turning to Page 3, what is this?

3 A. This is an account closure letter for a credit card.

4 Q. Okay. And can you please read the paragraph that begins
5 after careful consideration?

6 A. After careful consideration, we decided to close your
7 credit card account on September 8th, 2021, because Chase
8 closed a previous credit card deposit or investment account.

9 Q. And I want to show you Government's Exhibit 105, which is
10 already in evidence. If we could please go to Page 3. And
11 then what is this letter?

12 A. This is a default letter.

13 Q. And can you explain what that is?

14 A. So if payment is not made when it is due, the borrower is
15 sent a letter notifying of that default.

16 Q. So -- so this loan to Kremkov Industries, it says the
17 amount -- it says we are writing to let you know that your
18 loan is in default and now due in full. Please pay the
19 principal amount of \$2,999,910 immediately plus accrued
20 interest and -- accrued and accruing interest and any costs
21 and fees.

22 Now that -- that \$2.9 million number, what does that
23 represent?

24 A. That represents what was outstanding on the PPP loan.

25 Q. And is that the amount that Chase was unable to claw back

1 from Kremkov Industries' bank account?

2 A. Yes.

3 Q. The \$3 million check minus \$90, if my math is correct?

4 A. Yes. If your math is correct, yes.

5 Q. Did Kremkov Industries or Karl Delano, formerly known as
6 Carl Torjagbo, ever pay back the remaining nearly \$3 million
7 that was due on the loan?

8 A. No.

9 Q. Does -- did Chase ever receive any indication from
10 Mr. Delano that he was attempting to pay -- pay back that
11 money?

12 A. Not that I'm aware of.

13 Q. Did SBA ultimately forgive this loan?

14 A. No, they did not.

15 MR. EVERT: No further questions. Thank you.

16 THE COURT: Could y'all step out for just one moment,
17 please.

18 COURTROOM SECURITY OFFICER: All rise.

19 THE COURT: It's just going to be a minute. Okay?

20 (Whereupon, the jurors exited the courtroom.)

21 THE COURT: Y'all can be seated.

22 What was that wailing, do you know?

23 MARSHAL: It was a family member from another
24 courtroom.

25 THE COURT: Okay. All right. It's all over with?

1 MARSHAL: I believe so. They escorted them out.

2 THE COURT: Okay. I saw some of those folks getting
3 distracted. I just wanted to make sure that it wouldn't
4 happen again.

5 All right. You can bring them back in.

6 COURTROOM SECURITY OFFICER: All rise.

7 (Whereupon, the jurors entered the courtroom.)

8 THE COURT: Okay. Y'all can be seated go ahead.

9 MR. FINLAYSON: If I can have Page 101C -- or
10 Exhibit 101C, Page 105.

11 CROSS-EXAMINATION

12 BY MR. EVERT:

13 Q. And, ma'am, do you recognize that document?

14 A. Yes.

15 Q. And can you tell the jury what it -- tell the jury what it
16 is?

17 A. This would be a commercial loan invoice.

18 Q. And what's the account number?

19 A. Can you make it a little bit bigger?

20 Q. I'm sorry? For the -- how about this, this is for the
21 PPP loan; is that fair?

22 A. Yes.

23 Q. Okay. And what -- and the statement date there is -- it
24 looks like April 29th, 2022?

25 A. Correct.

1 Q. I'm going to hand you up what's marked Defendant's 2 and
2 Defendant's 3 and see if you can, based on that, recognize
3 these. Do you recognize them? They seem to be from the same
4 account, same account number.

5 A. Yes.

6 Q. Okay. And they're just later -- they're July and August
7 of '22 statements, right?

8 A. Correct.

9 MR. FINLAYSON: Your Honor, I would move in
10 Defendant's 2 and 3.

11 THE COURT: Any objection to 2 and 3?

12 MS. CONNORS: No objection.

13 THE COURT: Okay. Defense 2 and 3 are admitted.

14 MR. FINLAYSON: Thank you.

15 BY MR. FINLAYSON:

16 Q. Ma'am, if you could look at 2. And that's the July
17 statement, correct?

18 A. Yes.

19 Q. And that is the PPP loan we've been talking about here
20 today, right?

21 A. That is correct.

22 Q. And what does it show there, the balance on the account as
23 of July 2022?

24 A. The balance is \$2,999,910.

25 Q. And on the first page, what does it say -- what is the

1 payment amount due in July of 2022?

2 A. In July of '22, it was zero.

3 Q. Okay. And the -- and that is consistent with the payments
4 being deferred on the PPP loans, right?

5 A. That is correct.

6 Q. And if you look at the next one, Defendant's 3, that's the
7 following month's statement, right?

8 A. That is correct.

9 Q. And it's probably got the same balance, I'll bet?

10 A. Correct.

11 Q. Okay. And on the front page, that actually shows a
12 payment due, right?

13 A. That is correct.

14 Q. Okay. And that shows his first payment is due on what
15 date?

16 A. 8/29/22.

17 Q. 8/29/22 is when the first payment is due, right?

18 A. That is correct.

19 Q. And then you just testified earlier about a default notice
20 that went out from the bank in December of 2022, right?

21 A. I don't recall the date, but yes.

22 Q. Okay. Do you know whether Mr. Torjagbo -- I can't say it,
23 Mr. Delano, that's why we do that, Mr. Delano, do you know
24 where he was in August of 2022?

25 MR. EVERT: Objection.

1 THE COURT: Overruled.

2 The question is do you know where the defendant was
3 in August of 2022?

4 THE WITNESS: I don't.

5 BY MR. EVERT:

6 Q. Do you know why he didn't make a payment in August of
7 2022?

8 A. I don't.

9 Q. Did you talk to him about it at all?

10 A. No, I did not.

11 Q. Have you ever talked to Mr. Delano?

12 A. I have not.

13 Q. Thank you. All right. You mentioned that the bank clawed
14 back money, right?

15 A. Yes.

16 Q. So the bank clawed back like 6.5 million?

17 A. Yes.

18 Q. And so the amount due in August of 2022, was just under
19 \$3 million, right?

20 A. Correct.

21 Q. Now, you don't know where that \$3 million went, do you?

22 A. No, I don't.

23 Q. You were asked a series of hypothetical questions, like
24 well, if you bought a house with that, with that money, with
25 that \$3 million PPP loan, that would be bad, right?

1 A. That's correct.

2 Q. Or if you bought a car with that PPP money, that would be
3 bad?

4 A. Correct.

5 Q. What was the other one. If you started a new business
6 with that PPP money, that would be bad, correct?

7 A. Correct.

8 Q. Now, if you bought a house with your tax return or your
9 own money, not PPP money, that doesn't violate the PPP rules,
10 does it?

11 A. That's correct.

12 Q. Okay. And if you buy a car with tax return money or your
13 own income money, that doesn't violate PPP, right?

14 A. Absolutely not.

15 Q. Okay. And the same with starting a new business, correct?

16 A. Correct.

17 Q. Okay. So if I understand right, you -- Chase was an
18 authorized lending institution for the PPP program?

19 A. Correct.

20 Q. And that was sort of governed by the SBA and the federal
21 government?

22 A. Correct.

23 Q. You guys were the lender, right?

24 A. Correct.

25 Q. But that money was guaranteed by the government?

1 A. Correct.

2 Q. So you guys -- it sounds like a whole new department
3 opened up, I assume?

4 A. We pivoted from traditional lending to PPP.

5 Q. Okay. So you got -- you guys -- you guys didn't do this
6 for free, right?

7 A. No.

8 Q. Okay. You were paid -- the bank made 1 percent of the
9 loan amount, right?

10 A. I'm not exactly sure the exact -- there was -- there was
11 some fee income. I don't know the percentage myself.

12 Q. Okay. Does 1 percent sound unusual or unreasonable?

13 A. No, that -- I just don't know the exact amount.

14 Q. 1 percent can -- 1 percent of \$9.25 million is \$95,000.
15 Does that sound right?

16 A. Yes.

17 THE COURT: That sounds right that that's the amount?

18 THE WITNESS: That sounds like 1 percent.

19 THE COURT: Okay.

20 MR. FINLAYSON: No. Thank you.

21 BY MR. EVERT:

22 Q. And we have a calculator, I guess. You don't disagree --
23 I think that's right. 1 percent of \$9.5 million is \$95,000?

24 A. Correct.

25 Q. Somebody correct me if I'm wrong.

1 So the bank processes the applications for PPP loans,
2 right?

3 A. Correct.

4 Q. And there is a -- there may be not as much as a
5 traditional loan, but there is level of diligence that is
6 required by the bank in that process, right?

7 A. Yes, there was a review process required.

8 Q. And, in fact, you -- the first loan or application that
9 Mr. Torjagbo sent in, it was rejected, right?

10 A. That is correct.

11 Q. So y'all are looking at these documents, right?

12 A. Correct.

13 Q. Okay. And you mentioned the first one was rejected
14 because maybe there was a problem with the payroll
15 information?

16 A. There was something missing from the application.

17 Q. You said -- did you say payroll information or was that
18 somewhere -- no?

19 A. No.

20 Q. Okay. So subsequently, there is a phone call that we
21 heard played, the Government's 108, that call?

22 A. Correct.

23 Q. And Mr. Torjagbo was saying, hey, why is my -- why is my
24 account frozen, correct?

25 A. That's correct.

1 Q. And the person on the phone is -- puts him on hold for
2 several minutes, ten minutes, and can't quite give him an
3 answer why; is that fair?

4 A. That's fair.

5 Q. And then ultimately, she said, well, you have to -- when
6 she came back on, she said you have to submit some more
7 documents?

8 A. Correct.

9 Q. Okay. And in that call, Mr. Torjagbo is saying -- he's
10 grumpy because he's like I've got to repay this money. And if
11 you're going to hold it, I want that written in writing
12 somewhere so I don't have to repay what I didn't get. Is that
13 a fair synopsis?

14 A. Correct.

15 Q. He says I'm going to repay it, but I don't want to pay for
16 what I didn't get. That's the tenor for why he's complaining;
17 is that fair?

18 A. Yes.

19 Q. Okay. Now, there is -- the PPP program did have a
20 forgiveness option available, right?

21 A. That's correct.

22 Q. And many people in this country had their PPP loans
23 forgiven, correct?

24 A. Correct.

25 Q. Didn't have to pay them back?

1 A. That's correct.

2 Q. But Chase Bank, when there was forgiveness, you didn't
3 lose money, did you, Chase Bank?

4 A. For forgiveness?

5 Q. Yes.

6 A. No. It would -- the government -- the SBA would pay the
7 funds --

8 Q. Okay.

9 A. -- to pay off the loans that were with Chase --

10 Q. Okay.

11 A. -- for those PPP loans.

12 Q. And if there's a default, I assume the government also
13 repays Chase.

14 A. Yes, just like in our traditional SBA lending, there is a
15 guarantee associated with these loans.

16 Q. Okay. So you didn't -- you guys didn't lose any money on
17 this?

18 A. I can't say for certain all of the logistics of the
19 program.

20 Q. Okay. Do you know if -- if the -- if the fees to
21 Chase Bank were based on the original approved amount, but
22 then there was a clawback, did that fee go down or do you
23 know?

24 A. I don't know.

25 Q. You don't know, okay. You mentioned that in approving the

1 PPP loan -- and these are all looped together or lumped
2 together, there were sort of three things that were relied
3 upon. There was 941 forms, correct?

4 A. Correct.

5 Q. There were payroll documents, correct?

6 A. There were payroll documents as part of the application,
7 yes.

8 Q. And that's the list of the employees. Is that what we're
9 talking about?

10 A. Yes.

11 Q. Go ahead.

12 A. Chase relied on the 941 forms, but there were other
13 documents as part of the application.

14 Q. Well, when he asked you the question earlier, they got
15 lumped together. It was 941 forms, payroll documents and
16 personal tax returns.

17 A. That was all provided as part of the application, correct.

18 Q. And those were all relied upon by Chase in approving the
19 loan, right?

20 A. No, we used the 941 forms as part of our review.

21 Q. So you didn't rely on the payroll documents at all?

22 A. We used the 941 tax forms.

23 Q. So the list of employees, the 493 names, you didn't rely
24 on that at all?

25 A. I can't speak to what the reviewer looked at as part of

1 the review. But what was documented as our review was using
2 the 941 forms.

3 Q. Okay. So you -- you didn't actually do any of this; is
4 that fair?

5 A. I reviewed applications. I didn't review this
6 application.

7 Q. You didn't review this application?

8 A. Correct.

9 Q. So you don't really know what that person relied on?

10 A. Well, we do have documentation of what documents were
11 utilized to make the calculation to support the payroll
12 amount.

13 Q. Who did approve -- who was the person that reviewed these
14 documents?

15 A. It was in a prior screen. Louis Glauser was the credit
16 officer who approved this transaction.

17 Q. I'm sorry, what's the last name?

18 A. Glauser.

19 Q. Can you spell that for us?

20 A. I don't exactly know how to spell it, but it is in one of
21 the exhibits.

22 Q. So Louis Glauser looked at this application and was the
23 person that decided to grant it or not?

24 A. That is correct.

25 Q. Was he the person that did the -- rejected the earlier

1 one?

2 A. I don't know.

3 Q. So you're just sort of looking at internal documents after
4 the fact; is that fair?

5 A. That's fair.

6 Q. Okay. Did you know when this loan was going out? Did you
7 review it at all?

8 A. I did not review it at time of originations.

9 Q. Okay. We talked about forgiveness a little bit.

10 There was a deadline in the program for when
11 borrowers could ask for forgiveness, right?

12 A. That is correct.

13 Q. And letters were sent out to all the borrowers saying,
14 hey, if you want forgiveness, now or never, it's the time to
15 ask; is that right?

16 A. I'm not specifically aware of the outreach around the
17 communication for that. I can't -- I can't speak to that. I
18 wasn't part of that process.

19 Q. Okay. But you do know there was a deadline?

20 A. I am very aware of the deadline, yes.

21 Q. Okay. And is it -- were the borrowers told about the
22 deadline?

23 A. It was part of the note document, so they were told.

24 Q. Okay. And if they were told about the deadline, if they
25 opted in for forgiveness, they could, but if they didn't opt

1 in, they had to repay the money?

2 A. Correct.

3 Q. Okay. Have you reviewed the list of employees, the
4 payroll list at all?

5 A. I have.

6 Q. Okay. You've seen the names on that list?

7 A. I have.

8 Q. Okay. Like Charlie Brown?

9 A. Yes.

10 Q. Isaac Newton?

11 A. Yes.

12 Q. Oliver Twist?

13 A. Yes.

14 Q. John Snow? John Snow?

15 A. I don't remember that one specifically.

16 Q. James Brown?

17 A. Yes.

18 Q. Nancy Drew?

19 A. I don't remember that one.

20 Q. Colin Farrell? Daniel Glover?

21 A. I don't remember that one in detail.

22 Q. Gene Hackman?

23 A. Yes, I do remember that one.

24 Q. Bless his soul.

25 A. Edwin Moses.

1 A. I don't remember that one.

2 Q. Keanu Reeves.

3 A. Yes, I remember that one.

4 Q. Bruce Willis?

5 A. Yes, I remember that one.

6 MR. FINLAYSON: Those are all my questions, Judge.

7 THE COURT: Any redirect?

8 MR. EVERT: Yes. So a few questions, please.

9 If we could please pull up Page 81 of Government's
10 Exhibit 101.

11 REDIRECT EXAMINATION

12 BY MR. EVERT:

13 Q. Let's just take a look at some of these pages.

14 These are -- there is a list of the employees that
15 the defendant submitted in support of the PPP loan
16 application, correct?

17 A. Yes.

18 Q. Do you recognize any of the names on this page?

19 A. No.

20 Q. How about the next page?

21 A. No.

22 Q. How about the next page?

23 A. No.

24 Q. How about the next page?

25 A. No.

1 Q. So we're looking through -- so there were 42 pages of
2 annual payroll submitted. If you look at the top right of
3 this document, that will help.

4 A. Yes.

5 Q. And there were -- if we look at Page 80, we'll be able to
6 see that there are 71 pages of February 2020 payroll
7 submitted?

8 A. Yes.

9 Q. So there were some names that you recognized on this list?

10 A. Yes.

11 Q. And -- but there were a lot of other names that you
12 didn't -- that aren't recognizable on this list, correct?

13 A. Correct.

14 Q. And was the point -- what was the point -- what was -- was
15 speed of the essence when it came to the PPP program?

16 A. Absolutely.

17 Q. Why was speed of the essence?

18 A. Because of the -- how quickly the pandemic was impacting
19 the economic environment of the country and potentially
20 businesses and their ability to pay their employees.

21 Q. And what -- did SBA, in fact, require Chase to work
22 quickly on these -- on these applications?

23 A. Yes.

24 Q. And under the SBA regulations, was -- was Chase required
25 to look at every one of these names of all these people and

1 call them?

2 A. No.

3 Q. Was Chase required to go to the IRS and see, hey, has
4 anyone named Nick Wyllys paid -- had Social Security taxes
5 paid or anything like that?

6 A. No.

7 Q. The point was to get the money out to the small businesses
8 as quickly as possible?

9 A. Correct.

10 Q. And the applicants had to certify that the information
11 they were providing was correct, right?

12 A. Yes.

13 Q. So the clawback occurred before the forgiveness deadline;
14 is that correct?

15 A. Yes.

16 Q. And the account was frozen before -- before the -- before
17 the loan was in default; is that correct?

18 A. That's correct.

19 Q. And nothing about the defendant's decision to ask for
20 forgiveness or not impacted the clawback; is that correct?

21 A. That's correct.

22 Q. Yeah, I believe defense counsel said on cross-examination
23 that in that recording, Government Exhibit 108, the defendant
24 said I am going to repay the loan.

25 Did he say that on that call, those -- use those

1 exact words?

2 A. I don't recall.

3 Q. As a result -- what -- as a result of this -- of this
4 loan -- the loan was in default for approximately \$3 million;
5 is that correct?

6 A. Correct.

7 Q. Was that money ever forgiven by the SBA?

8 A. No.

9 Q. So did Chase lose that -- Chase is out that money; is that
10 correct?

11 A. That is correct.

12 Q. And I believe you testified that based on the documents
13 you've seen, it looks like what -- what Chase specifically
14 relied on in confirming the eligibility date -- or confirming
15 that Kremkov was in operation as of February 15th, 2020, was
16 the 941 form, correct?

17 A. No, they used the February payroll document.

18 Q. Oh, they used the February payroll document.

19 And that is the document that includes -- that
20 document includes Charlie Brown?

21 A. Correct.

22 Q. Does it include Keanu Reeves?

23 A. I believe so.

24 Q. Does it include Bruce Willis?

25 A. Yes.

1 Q. So Chase did rely on that February 2020 payroll document
2 in -- in its decision to approve this loan?

3 A. Yes.

4 Q. And all of the documents submitted, if Chase had known
5 that there was false information in there, would it have, in
6 fact, approved the loan?

7 A. No.

8 MR. EVERT: No further questions. Thank you.

9 THE COURT: May the witness be excused?

10 MR. FINLAYSON: She may.

11 THE COURT: Thank you very much.

12 All right. Call your next witness.

13 MS. CONNORS: Your Honor, I mentioned we might need
14 just a couple of minutes.

15 THE COURT: Do you want the jury to step out while
16 you do it?

17 MS. CONNORS: That probably would be good.

18 THE COURT: Okay. Five minutes. I'm not even going
19 to get up.

20 (Whereupon, the jurors exited the courtroom.)

21 MS. CONNORS: Okay. Thank you so much, Judge. I
22 think I'm good.

23 THE COURT: All right. Let's bring them in.

24 Around 12:30-ish, if you get to a good stopping
25 point, I'm not a stickler either way.

1 MS. CONNORS: Okay.

2 COURTROOM SECURITY OFFICER: All rise.

3 (Whereupon, the jurors entered the courtroom.)

4 THE COURT: All right. You can be seated.

5 Call your next witness, please.

6 MS. CONNORS: Thank you, Your Honor.

7 The United States calls James Davis.

8 - - -

9 JAMES DAVIS,

10 A witness herein, having been first duly sworn, was examined
11 and testified as follows:

12 - - -

13 COURTROOM DEPUTY: Thank you.

14 For the record, will you please state and spell your
15 first and last name for the record.

16 THE WITNESS: James Howard Davis, J-A-M-E-S,
17 H-O-W-A-R-D, D-A-V-I-S.

18 COURTROOM DEPUTY: Thank you.

19 DIRECT EXAMINATION

20 BY MS. CONNORS:

21 Q. And, Mr. Davis, there you go. I was about to say if you
22 could scoot up a little bit, we should be able to hear you.

23 Good afternoon. Can you tell us where you're
24 currently employed?

25 A. I work for Intuit, Incorporated.

1 Q. Okay. And how long have you been with Intuit?

2 A. About -- approximately 13 years.

3 Q. Okay. And what is your position with Intuit?

4 A. I'm an applications operations engineer, senior
5 applications operations engineer.

6 Q. Um-hmm. Now, prior to starting with Intuit, what field
7 were you in?

8 A. I had an information technology background.

9 Q. Okay. Now, Mr. Davis, you work for Intuit.

10 Is there a particular tax product that Intuit puts
11 out or makes available to individuals?

12 A. My position at Intuit is I administrate and manage the
13 electronic filing engine. And all of Intuit's tech products
14 use that electronic filing engine to submit returns to state
15 and federal agencies.

16 Q. Okay. And is TurboTax one of the filings -- or a system
17 for filing with Intuit or --

18 A. It is.

19 Q. Okay. So can you kind of give us a general idea of how
20 that process would work of using TurboTax?

21 And then you indicated there is an electronic filing
22 engine that you specifically work with?

23 A. Yeah. The process -- where I'm involved is -- is once the
24 customer submits the filing. But so you're in your tax
25 application, TurboTax, we're talking about. And when you're

1 finished doing the final part of that application, you're
2 going to end up after -- after digitally signing it and that,
3 you're going to hit the submit button. And that's when it
4 goes to the electronic filing engine.

5 At that time, your return has been -- the return has
6 been completed by the customer, they've -- they've filled out
7 all the information on it. They hit that submit button and it
8 sends it to the electronic filing engine.

9 And at that time, that filing is first going to go
10 through some -- some checks to make sure it's -- it's got the
11 correct format, it's got the correct data per preset
12 instructions for that. And it's going to -- it's going to be
13 able to kick that back to the customer if there's something
14 missing really quick, and they can fix that.

15 If everything passes that, it's going to go through
16 the electronic filing engine and it's going to be changed into
17 the format that the state or federal agency wants that
18 electronic data to be trans -- transmitted in.

19 Q. Okay.

20 A. That process is pretty quick. There is -- there is some
21 conversion of that data before it's transmitted and then it's
22 batched and sent to the agency.

23 Q. And when you refer to agency, would the IRS be one of
24 those agencies?

25 A. IRS is one of the agencies, yes.

1 Q. Okay. Now, before I move on, I want to try to backpedal
2 just a little bit.

3 So before there is the actual submission of the tax
4 filing and you're in the actual TurboTax application, is that
5 going to be based on user data or user input for the
6 information?

7 A. Yeah. As the customer uses the product, you know, it's
8 designed to help you fill out these forms, the state and
9 federal forms and others.

10 And the customer is going to input the data required.
11 This -- the tool itself is -- helps you walk through that
12 process. There's various versions of getting your data. You
13 can be manually entering it or you can -- you can have it
14 exported and imported into TurboTax.

15 All of that process is managed by the customer. And
16 the customer has to review it and look at it. But there is
17 some -- some pieces of it where you can get the data entered
18 that way.

19 Q. Now, when you talk about importing that data, is it that
20 TurboTax is directly linked to, say, an IRS system to where
21 you could just put in either your name or your social and it
22 will immediately pull in any data?

23 A. No, that's -- it's a little different than that. TurboTax
24 has the ability to connect with the customer's accounts that
25 they have, their systems, and the customer logs themselves in,

1 essentially using TurboTax. And then can -- like with ADP or
2 another payroll service, can download their W-4 and get that
3 data. But that's a -- that's a manual process that the
4 customer initiates and manages within the TurboTax
5 application.

6 Q. Okay. And that would be -- you mentioned like ADP, a
7 third-party processor, more -- is it on the side of like
8 private companies --

9 A. Yeah, I --

10 Q. -- that you would be able to import your data from?

11 A. Yeah, external company. Yeah, it's not associated with
12 Intuit. But, yes, they would use their own account to log
13 into that and export data.

14 Q. Okay. And just to be clear, TurboTax does not link
15 automatically with, say, Social Security's databases and
16 systems and it doesn't link directly with IRS databases and
17 systems for purposes of putting information into the tax
18 return?

19 A. That's correct.

20 Q. So in terms of the information that gets listed in a tax
21 return, is that going to be input by the user or if they're
22 going to import, it's still the user who has to do that
23 import?

24 A. Yeah. And the software would prompt the user also to
25 review the data that's imported. It's -- it's -- that's part

1 of the steps as you're going through the application.

2 Q. Okay. Is that essentially to ensure accuracy of the
3 return?

4 A. Absolutely. And to make sure that the customer is aware
5 of the data that was inputted.

6 Q. Okay. And then you mentioned there could be some prompts
7 along the way to assist with filling out the form?

8 Would that be like, for example, if someone says that
9 they are a business owner, would it possibly -- would Intuit
10 have maybe questions or something to try to determine what
11 potential tax forms needed to be filed?

12 A. Correct. And the application itself is trying to help
13 you, you know, do your return correctly, your returns
14 correctly, so, yeah, there's prompts and that to assist you in
15 finding the right forms and making sure that you complete the
16 process correctly.

17 Q. Okay. And you mentioned a few moments ago about
18 electronically signing the tax filing. How does that happen
19 through TurboTax?

20 A. When you're -- when you're at the end of the process
21 before you submit it, you're required to produce an ID and
22 your pin to be able to submit to the IRS. That's an IRS
23 requirement. And TurboTax facilitates that.

24 Q. Okay. Do you mean that for an electronic tax return, IRS
25 has that requirement?

1 A. Correct.

2 Q. And it's TurboTax, since you're going to be submitting the
3 returns to the IRS and potentially other agencies, you're
4 meeting their requirements, is that what's happening?

5 A. That's -- that's what's happening. That's an IRS
6 requirement to be able to submit to their systems.

7 Q. Okay. And along the way in the data being filled out or
8 the information being entered into the tax filing through
9 Intuit, Intuit -- or I should refer to TurboTax, TurboTax is
10 not independently checking for accuracy of that data?

11 A. There's no way for TurboTax to know the accuracy of the
12 data. That's why the customer is required to look through the
13 data and make sure that it's accurate.

14 Q. Okay. Now, you mentioned that once the tax return is
15 submitted by the user, it goes through this additional
16 process. Is that kind of strictly behind the scenes from the
17 customer?

18 A. Yeah. It's -- that's part of the electronic filing engine
19 doing the different things that have to be done after the
20 return is filed. Part of it is reviewing it for errors, part
21 of it is making sure that it's meeting the state and federal
22 agency requirements to be in the right format and configured
23 correctly. And then it has to be prepared to be able to be
24 submitted. And that's -- that's a process of grouping filings
25 together and then sending them off to the agency.

1 Q. Okay. Now, in terms of once that filing is transmitted to
2 the agency, is the TurboTax system or the EF -- the electronic
3 filing engine still kind of monitoring that return, if you
4 will?

5 A. Yeah. We -- we constantly check for the acknowledgment
6 from the -- from the IRS for -- for filings. And they give
7 acknowledgments in batches, large batches of filings. And
8 we -- we check consistently and those are retrieved from the
9 IRS.

10 Q. Okay. Now, what exactly is the acknowledgment that you're
11 looking for?

12 A. The acknowledgment is going to come back as succeeded,
13 meaning that the return was accepted by the IRS, or rejected,
14 and if it's rejected, it's going to have an error associated
15 with it. The IRS is going to return a very clear error for
16 what's wrong with it and that will -- those are the two
17 responses.

18 Q. Okay. So let's talk about if a return is rejected by the
19 IRS or by an agency. Would TurboTax relay that information?

20 A. Yes. TurboTax, depending on the error from the agency,
21 TurboTax is going to give a response to the customer with the
22 information on how to solve the problem, how to fix the
23 return. That's -- that's the most common one.

24 The other -- the other thing that can happen is there
25 will be an error from the IRS in this case that is unknown,

1 the error is not known. And that will go into a system where
2 the content folk will review it first and see what the error
3 is and then help the customer take action.

4 Or possibly it's something that our system created
5 and we can actually fix the error and return the filing to the
6 IRS, resubmit it.

7 Q. Okay. So in terms of what TurboTax or Intuit would kind
8 of fix in terms of errors, what would be some examples of
9 those?

10 A. Where the -- our system -- maybe there's a timestamp
11 issue. I'm just guessing here. But there -- we don't get
12 this very often, but there could be a problem with our system.
13 Maybe our -- one of our system IDs wasn't accepted. And it
14 could come back with an error on that and we can just
15 retransmit it quickly, even though it did have an error, a
16 transmission error, so that's the most common.

17 Q. Okay. So is that kind of like a technical error --

18 A. Yeah, it's --

19 Q. -- or something that prevented the transmission?

20 A. Correct.

21 Q. Now, if it's an error that is specific to the information
22 in the tax return, is that going to have to go to the user to
23 fix that error?

24 A. Yeah. The user is going to be responsible for changing
25 the data in their return, if that's what -- if that's what the

1 error implies.

2 And that gets kicked back to the user with
3 information, maybe a link to a support answer where they could
4 walk -- where you could get walked through the solution. Or
5 maybe even you might be called by a support representative,
6 depending on the issue.

7 Q. Okay.

8 A. To help.

9 Q. And so TurboTax may assist in terms of walking through the
10 correction, but would it be the user that had to actually
11 input the correction if it is an issue of some type of data or
12 information in the return?

13 A. Yes.

14 Q. And in terms of the rejection, I think you've mentioned
15 TurboTax is going to relay that.

16 Are they also trying to give, you know, pretty good
17 information about what's wrong?

18 A. Yeah, a lot of the errors, the information is known
19 information that can be, you know, given easily in an email
20 and inside the app.

21 Q. Okay. And so you just mentioned email, is that -- and
22 also the app, is that typically how any kind of error would
23 be -- or error information would be relayed to the user?

24 A. Yes.

25 Q. Okay. And in terms of an accepted filing, is -- is the

1 customer notified by TurboTax if the return goes through?

2 A. Yes.

3 Q. And, Mr. Davis, if you would look at -- you already have
4 one exhibit on the screen, because that's a little easier to
5 look at. That is Exhibit 220. There should also be a binder
6 in front of you for some additional exhibits.

7 MS. CONNORS: And may I approach, Your Honor?

8 THE COURT: You may.

9 BY MR. EVERT:

10 Q. And, Mr. Davis, in that binder, you would see Exhibits 221
11 through 228. And there's tabs on them.

12 Can you just briefly look at those and let me know if
13 you recognize those documents.

14 A. These all appear to be 1040 forms.

15 Q. Okay. And specifically, are they documents related to
16 filings that went through TurboTax?

17 A. I'd have to correlate them, but that's what -- these just
18 look like 1040 forms to me.

19 Q. Okay. Prior to your testimony today, did you have an
20 opportunity to look at these exhibits, Exhibits 220 to 228?

21 A. In the -- in the information we provided in the Excel
22 spreadsheet.

23 Q. Yeah. And based on that, are -- did Intuit -- were there
24 filings with TurboTax?

25 A. Yes.

1 Q. Okay.

2 MS. CONNORS: Your Honor, I would move to admit
3 Government's Exhibits 220 to 228.

4 THE COURT: Any objection to 220 to 228?

5 MR. FINLAYSON: No objection.

6 THE COURT: Okay. They are admitted.

7 MS. CONNORS: Okay.

8 BY MS. CONNORS:

9 Q. And Mr. Davis, I am going to have you look at 220
10 first.

11 MS. CONNORS: And, Ms. Kelley, could you turn on the
12 podium? Or, I'm sorry, is it already on?

13 THE COURT: The jurors?

14 MS. CONNORS: Yes, yes. Oh, I see it on his screen,
15 but I don't see it on the back one.

16 THE COURT: His matches yours. Now she'll display it
17 to everybody.

18 Can y'all see it?

19 MS. CONNORS: Oh, okay.

20 BY MS. CONNORS:

21 Q. Okay. So this is an Excel spreadsheet, there's a lot of
22 columns. I'm going to have to scroll to the side, so bear
23 with me.

24 But, Mr. Davis, have you had an opportunity to look
25 at this Excel spreadsheet before?

1 A. I have.

2 Q. Okay. Now, in terms of this spreadsheet, do you see rows
3 2 through 9 that have essentially different tax filings
4 associated with them?

5 A. Yes.

6 Q. Now, for the -- I'm going to hopefully try to see if I can
7 highlight this first row.

8 Okay. So looking at the first row here -- I'm going
9 to scroll. Okay. There is a Social Security number listed
10 in -- it's under Column B ending in 6010. Do you see that?

11 A. I do.

12 Q. Okay. Now, if you look, is there another return at Row 7
13 that also has a Social Security ending in 6010?

14 A. I see that also.

15 Q. And then for the other returns in between, do the rest of
16 them have 0540 as the Social Security number?

17 A. They do.

18 Q. And so going across with Row 2, I'm -- yes, Row 2 for that
19 top return ending in 6010 for the SSN, what was the status of
20 that filing?

21 A. That filing is rejected agency.

22 Q. And in terms of the agency, would that be IRS that's
23 reflected with the filing type?

24 A. Correct.

25 Q. Okay. And for period, it says Y2020, what would that

1 mean?

2 A. That's the tax year.

3 Q. Okay. Now, there's a received stamp, received timestamp.

4 What is the received date and time for this filing?

5 A. February 6, 2021, 6:05:57 p.m.

6 Q. Okay. And in terms of that information, is that something
7 that Intuit or TurboTax's system report is that filing
8 timestamp?

9 A. Correct. That's the timestamp when the electronic filing
10 engine receives it.

11 Q. And so for this return, since it was rejected, when you've
12 looked at this before, is the rejection code noted?

13 A. Yeah. If you scroll over, it will have the reject reason
14 there.

15 Q. Okay. So before we even get to that, in terms of the --
16 every row for the various filings here, is the legal name
17 Carl Torjagbo for all of them?

18 A. It is.

19 Q. Now, for this first one that we're looking at, is there an
20 address in Houston, Texas, that was used for the return?

21 A. That is the address that was entered on the return, yes.

22 Q. Okay. And there's taxpayer phone number, is that phone
23 number the same for every return?

24 A. It is.

25 Q. And taxpayer date of birth is part of the data that

1 TurboTax collected?

2 A. Correct. That's the -- that date of birth that was
3 entered by the customer.

4 Q. Okay. And that date of birth is what?

5 A. September 8th, 1975, 12:00 a.m.

6 Q. Is the 12:00 a.m. a default in the system or --

7 A. I believe so.

8 Q. Okay.

9 A. I mean, start of the day, I guess.

10 Q. Okay. Gotcha. Okay. And then looking -- it looks like
11 there's a carldelano3@outlook.com email address associated
12 with that return and you see that again in Row 7?

13 A. I do.

14 Q. But -- and then in between, there's a torjagboc@gmail.com
15 email address used for the other returns?

16 A. Correct.

17 Q. Okay. And now, IP address, are you familiar with IP
18 addresses?

19 A. I am.

20 Q. Okay. And what is an IP address, generally speaking?

21 A. This is a network address assigned to that network point
22 where the computer was.

23 Q. And so would that be the user's IP address that's getting
24 recorded there?

25 A. That would be the IP address of the system that we

1 connected to.

2 Q. Okay. And in terms of the IP address listed, was the IP
3 address the same for all of these electronic filings?

4 A. It is.

5 Q. Okay. And then there is information for a bank account
6 and routing number. Why does that information get collected?

7 A. That's collected to -- for either paying your taxes or
8 having your refund direct deposited to your bank account.

9 Q. Okay. And then I'm going to see if I can scroll over to
10 the error information.

11 So for this one, there is an error code and a -- in
12 that row, and then is there some -- a specific error message
13 that's kind of in that -- in that text that's highlighted?

14 A. Yes.

15 Q. Okay. And looks like this earlier part, pretty much up
16 until the words error message, there's sort of some numbers
17 and other things, but starting at -- after that equal sign
18 there, error message equals, what -- what was the error
19 message?

20 A. This error message is noting that on the W-2, Line B, the
21 employer EIN was issued after the tax year in the return
22 header. This is an IRS error, this is an error that they have
23 caught.

24 Q. Okay.

25 A. And have sent back.

1 Q. All right. So that error message then meant that IRS
2 rejected this return and --

3 A. Yes, this is the IRS rejecting the return for apparently
4 an invalid EIN.

5 Q. Okay. And then kind of looking ahead a little bit, Row 3
6 and Row 5, do those have the same error message?

7 A. They do.

8 Q. Okay.

9 MS. CONNORS: And, Ms. Kelley, if you will send it
10 back to the paralegals, I'm going to ask them to pull up
11 Exhibit 221.

12 Oh, I'm sorry, Ms. Kelley, it didn't connect. Could
13 you --

14 COURTROOM DEPUTY: It switched. It might be
15 something with the laptop.

16 MS. CONNORS: Oh, okay.

17 And, Ms. Wilson, if you will go to Page 25 of that
18 exhibit. Okay. And if you can zoom in on this part here
19 (indicating).

20 BY MR. EVERT:

21 Q. All right. Mr. Davis, do you see a -- in terms of this
22 document, is it summarizing the W-2 information?

23 A. Yes.

24 Q. Okay. And now do you see that in -- there's a bold B and
25 then it says employer ID number?

1 A. I do.

2 Q. Okay. And that employer ID number, what are the last four
3 digits?

4 A. 7540.

5 Q. And in terms of the bottom section with employee
6 information that starts letter E and F, for E, who was -- what
7 was the name of the individual employee whose W-2 data this
8 is?

9 A. Carl, sorry if I don't pronounce this right, Torjagbo.

10 Q. Torjagbo?

11 A. Yeah.

12 Q. Okay. And then is there an address?

13 A. Yes.

14 Q. In Houston, Texas?

15 A. Correct.

16 Q. Okay. And you may not remember exactly, but do you recall
17 that we saw on Exhibit 220 the Excel spreadsheet that a
18 Houston, Texas, address was associated with a rejected return?

19 A. I did.

20 Q. And in terms of Government's Exhibit 221, is this the
21 return information related to that rejected return, that first
22 row on the spreadsheet?

23 A. Yes, this appears to be data from that filing.

24 Q. Okay.

25 MS. CONNORS: And, Ms. Wilson, if you'll zoom out of

1 that one and get us to Page 20 of the tax filing.

2 BY MS. CONNORS:

3 Q. And in terms of this tax filing, does it indicate that --
4 is there a box that's checked for taxpayer is a resident of
5 the state above for the entire year?

6 A. There is.

7 Q. Okay. And then is there an abbreviation for the state a
8 little bit above that?

9 A. Yeah, Texas.

10 Q. Texas. And now when this return was rejected because of
11 the issue with the EIN not being in a year, an appropriate
12 year for the 2020 return, would that have been conveyed to the
13 user?

14 A. It would.

15 Q. Now, after that gets conveyed to the user, would the user
16 be able to go back to the tax return in TurboTax's system and
17 make any changes?

18 A. Yeah, that's -- that's how it works. So you get the error
19 and now you're -- when you go back to TurboTax, you would --
20 you would be put with -- you would be put back into the return
21 at that point where you can make the changes.

22 Q. Okay. And we saw there was an email address listed.
23 Would notification about the rejection go to email or some
24 other electronic method?

25 A. It would. And it would be in the app, obviously, when you

1 logged in, you would -- you would see the notification.

2 Q. Okay.

3 MS. CONNORS: Your Honor, I think that's the breaking
4 point.

5 THE COURT: Okay. Lunch. We'll be back in one hour.
6 Okay?

7 Thank you-all very much. Continue following my
8 instruction. Don't talk to each other about this. Okay?
9 Talk to each other about anything else.

10 All right. Thank you.

11 COURTROOM SECURITY OFFICER: All rise.

12 (Whereupon, the jurors exited the courtroom.)

13 THE COURT: You can step down. Just be back here at
14 12:30, all right?

15 All right. Anything y'all want to talk about?

16 I'm sorry, 1:30.

17 MS. CONNORS: Yeah, I was about to say that didn't
18 sound right.

19 THE COURT: Anybody got anything to talk about?

20 MR. FINLAYSON: I've got something to talk about and
21 I hate to bring this up.

22 THE COURT: Y'all can be seated.

23 MR. FINLAYSON: As I'm hearing about these engines,
24 these -- and I don't know, she may be done with the engines
25 and --

1 MS. CONNORS: Counsel for Intuit is still in the
2 courtroom. I don't know if that matters.

3 MR. FINLAYSON: I think it's okay. I just -- my
4 concern is that whether we're in the land of expert testimony.
5 And I know she hasn't called him as such and there's been no
6 notice of such, but his stuff is pretty darn technical.
7 And --

8 THE COURT: I mean, all he's talking about now is
9 sort of the interface of software. He's not talking about --
10 he's talking about the operation of a software system. It's
11 fairly simple. It's input this and it prints out.

12 MR. FINLAYSON: Well, that's why I didn't bring it up
13 before, so I --

14 THE COURT: Okay.

15 MR. FINLAYSON: I'll -- that's fine.

16 THE COURT: Okay.

17 MR. FINLAYSON: I don't --

18 THE COURT: I'm going to bring you-all back after
19 lunch copies of the current state of the jury instructions
20 with my redlines on top of what you-all gave me.

21 I've changed that one disputed issue a little bit to
22 make it more in line with the Supreme Court case that you-all
23 cite.

24 MS. CONNORS: For *Kousisis*, Your Honor?

25 THE COURT: Yes. Let me just see if I can --

1 MS. CONNORS: I don't know how to spell it. Let me
2 just see.

3 THE COURT: To say -- you'll see it, but I'm going to
4 point it out to you so you can look at it and think about it
5 so we can talk and make some decisions at the end of the day.

6 But the way I have changed it, or proposed to do it,
7 is to say or promises to obtain the victim's money or
8 property, proving intent to defraud does not require proof
9 that the defendant acted with the intent to leave the victim
10 economically worse off or cause the victim a net pecuniary
11 loss. Y'all had it as to cause the victim economic loss.

12 MR. FINLAYSON: Your Honor.

13 THE COURT: Yes.

14 MR. FINLAYSON: Just to be clear, we disagreed on
15 that. I recognize the change in the law after *Kousisis*, but I
16 submit there's an ex post facto, so --

17 THE COURT: I know. I get that. But I'm kind of
18 doing both things.

19 MR. FINLAYSON: Okay. Got it.

20 THE COURT: I want you to look at the language that
21 I've proposed and tell me if you disagree with that as opposed
22 to the language you initially provided.

23 And then secondarily, we'll go with Mr. Finlayson's
24 objection to the ex post facto issue.

25 Okay?

1 MS. CONNORS: Is there any way that we could get
2 that, just that snippet over the lunch break?

3 THE COURT: Yes. You want it over the lunch break?

4 MS. CONNORS: Yes. If you wouldn't mind, it would be
5 helpful.

6 THE COURT: Yes, if you give us a minute, we'll print
7 a copy out. We'll print out two copies or three copies.
8 Okay?

9 MS. CONNORS: Thank you, Your Honor.

10 MR. EVERT: Thank you.

11 THE COURT: Yes. Ms. Hendrix will be back shortly
12 with it. Okay?

13 Thanks.

14 COURTROOM SECURITY OFFICER: All rise.

15 (Whereupon, a lunch recess was taken.)

16 THE COURT: Are y'all ready for the jury?

17 MS. CONNORS: Yes, Your Honor.

18 THE COURT: Okay.

19 MS. CONNORS: Can we go ahead and bring in the
20 witness, too?

21 THE COURT: Yes.

22 COURTROOM SECURITY OFFICER: All rise.

23 (Whereupon, the jurors entered the courtroom.)

24 THE COURT: Okay. Y'all can be seated.

25 Go ahead, please.

1 By the way, we're trying to get it a little bit
2 warmer in here. But we may regret that if they -- there's not
3 exactly a lot of sensitivity to the dial, so we'll see how it
4 goes, but we're trying to get it warmer.

5 MS. CONNORS: I appreciate it.

6 THE COURT: Yes.

7 BY MS. CONNORS:

8 Q. Okay. Mr. Davis, we had just ended looking at that
9 rejected IRS filing under the Social Security Number 6010.

10 MS. CONNORS: And, Ms. Kelley, if I could have my
11 station.

12 BY MS. CONNORS:

13 Q. Okay. Okay. Now, Mr. Davis, I'm going to go through some
14 of the information again for the next two filings here.

15 Now I'm going to scroll over one. And I've
16 highlighted Row 3 and Row 4 of the Government's Exhibit 220.

17 And in terms of the Social Security number that was
18 being used for these filings, is it a Social ending in 0540?

19 A. Yes.

20 Q. Okay. And then currently with the columns that are on the
21 screen, if you'd look over to the far right and you see
22 there's the received timestamp.

23 Are both of the highlighted returns submitted on
24 February 6th, 2021 at 11:06 p.m.?

25 A. They are.

1 Q. Okay. Now, does one indicate that it's an IRS filing and
2 is the other one a Georgia filing?

3 A. It is.

4 Q. If someone is using TurboTax to file their federal and
5 state tax return at the same time, is this typical that they
6 both get transmitted at the same time?

7 A. In this -- what happens with the state is when the feds
8 reject it -- oh, first of all, the fed has to be accepted
9 before we transmit to the state if they're not transmitted at
10 the same time.

11 But also when the feds rejected, the state's
12 automatically rejected in the system, so the state filing is
13 rejected because of the federal returns rejection.

14 Q. Okay. And so you were just going over the information in
15 the status.

16 What about for the timestamp, is it that this was
17 submitted into the system, into the EFE at the same time?

18 A. Yes. Yes. Both filings came in at the same time. They
19 come in together.

20 Q. So kind of they're coupled together, if you will, the
21 federal and the associated state return?

22 A. Correct.

23 Q. Okay. And now, you already mentioned it, this -- these
24 two returns -- and I'll probably mostly refer to the federal
25 return here -- but both of these were rejected by the agency?

1 A. So the Georgia return is rejected because of the federal
2 return and the fed return was rejected by the agency.

3 Q. Okay. So once that happened, then there was -- the
4 Georgia return was going to get rejected as well?

5 A. It did -- for the Georgia return to have been filed, it
6 would have had to have had a successful fed filing.

7 Q. Okay. And are we -- it -- here does it still indicate
8 that the tax year is 2020?

9 A. Yes.

10 Q. And I am going to scroll over some. Now we looked at this
11 earlier, but in terms of legal name, still Carl Torjagbo for
12 these two filings?

13 A. Yes.

14 Q. Okay. And is one -- is there a difference in terms of the
15 address for the taxpayer used between the one that we just
16 discussed that shows in Row 2 versus the returns that we're
17 discussing now in Rows 3 and 4?

18 A. Yes, the addresses are different.

19 Q. Okay. Is it also a different -- is it a different state?

20 A. It is.

21 Q. Now, I think you mentioned it earlier, but is the taxpayer
22 phone number the same for these filings as it is for all of
23 the ones?

24 A. Yes, they are using the same phone number.

25 Q. Okay. Now, there's a taxpayer date of birth that's

1 identified. Is that a part of the data that's been obtained
2 for -- through TurboTax?

3 A. Yes, it's customer input data.

4 Q. Okay. And that customer input data, the date of birth is
5 what?

6 A. Of the two highlighted.

7 Q. Yes.

8 A. September 10th, 1979.

9 Q. And I'll scroll over a bit more. Now, we went over it
10 earlier, are these two returns associated with the gmail
11 account, the gmail email address?

12 A. They are.

13 Q. Is the IP address the same as the return that we looked at
14 before and same as the other ones?

15 A. Yes, that is the same IP address.

16 Q. And again, is there bank account information being listed
17 associated with this return?

18 A. Yeah, one of them.

19 Q. Now, here in terms of that return, is the same error
20 message related to the W-2 Line B employer EIN was issued
21 after the tax year?

22 A. Correct, same error.

23 Q. And I think you mentioned earlier that's a rejection code
24 at least the one for Row 3, is that an IRS rejection code?

25 A. No, that's a -- that's an internal rejection code

1 signifying that the fed was -- that the fed failed and was not
2 succeeded agency.

3 Q. Okay. In terms of the like the FW2505-01, is that
4 TurboTax code?

5 A. That's an IRS error code.

6 Q. All right. And so these -- these returns are -- more
7 specifically, the federal return, was the error message the
8 same as what had happened with the return we discussed in Row
9 2 that that was filed under the 6010 Social Security number?

10 A. Yes, same error.

11 MS. CONNORS: Now if we could switch, Ms. Kelley,
12 back to the paralegal table.

13 BY MS. CONNORS:

14 Q. And, Mr. Davis, I'm going to pull up Government's Exhibits
15 222 and 223. I'm really mostly going to go with 222.

16 MS. CONNORS: You could actually just have 222 up.

17 BY MS. CONNORS:

18 Q. But in terms of Exhibits 222 and 223, were those the
19 corresponding returns for Rows 3 and 4?

20 A. I believe so.

21 Q. Okay.

22 MS. CONNORS: Could you make that the full screen?
23 It's hard to see. That's okay. If you zoom in at the top
24 where it shows the individual data.

25

1 BY MS. CONNORS:

2 Q. Okay. And just so that we can confirm, is this a return
3 that identifies the Social Security number 0540?

4 A. It does.

5 MS. CONNORS: And then if we can go to Page 14 of
6 that exhibit. And then if you can zoom in on this section
7 here (indicating).

8 BY MS. CONNORS:

9 Q. Okay. Now, we looked at a form W-2 for Exhibit 221 before
10 the lunch break. Here, what is the name on the W-2?

11 A. Carl Torjagbo.

12 Q. Okay. And does it indicate that this is a W-2 related to
13 employer Kremkov Industries in Section C?

14 A. It does.

15 Q. Okay. And now in terms of the employer ID number, is the
16 employer ID number -- does that end in 8332?

17 A. It does.

18 Q. Okay. And you might have to look back at the binder, at
19 Exhibit 221. I'll tell you, it should be Page 25 of that
20 exhibit.

21 Now, looking back at Exhibit 221, and the W-2 for
22 that first tax return that we discussed, what -- what's the
23 EIN on that W-2?

24 A. 86-1347540.

25 Q. So is that different than the EIN number on this W-2?

1 A. It is.

2 MS. CONNORS: And if we can go to Page 9 of this
3 Exhibit 222.

4 BY MS. CONNORS:

5 Q. And this one will come up on your screen. Now, for this
6 return --

7 MS. CONNORS: Can you zoom in under that taxpayer
8 section?

9 BY MS. CONNORS:

10 Q. Okay. For this return, is it marked for taxpayer's
11 resident of the state above for the entire year?

12 A. It is.

13 Q. And what state is referenced?

14 A. Georgia.

15 Q. Now, the first return that we looked at, did it reference
16 Texas?

17 A. It did.

18 Q. Okay.

19 MS. CONNORS: And, Ms. Kelley, if you can put it back
20 with me, please.

21 BY MS. CONNORS:

22 Q. Okay. So now there's Rows 5 and 6 of Exhibit 220, is this
23 again where there's a federal return and an associated Georgia
24 return?

25 A. Correct.

1 Q. Now, like the two returns listed in Rows 3 and 4 for Rows
2 5 and 6, is the Social Security number 0540?

3 A. It is.

4 Q. Now, is this also referring to filings through TurboTax
5 for tax year 2020?

6 A. It is.

7 Q. Now, was -- were these two returns, the federal and the
8 associated Georgia, were these rejected by the agency?

9 A. Scroll over. Oh, no, it's right here. Sorry. Yes, they
10 are rejected by the agency.

11 Q. Okay. Now, in terms of the received timestamp for Rows 5
12 and 6, was this return submitted through the TurboTax program
13 on February 12th of 2021 at 6:15 p.m.?

14 A. Yeah. They were, yes.

15 Q. Now I'm going to scroll over. Now, does this return also
16 use a Douglasville, Georgia, address?

17 A. It does.

18 Q. Okay. Does it have still the birthdate associated of
19 September 10, 1979?

20 A. It does.

21 Q. Same IP address again?

22 A. Yes.

23 Q. And I'm going to scroll over to the error again. Sorry,
24 trying not to make everybody dizzy.

25 And is there the same error message related to the

1 IRS return?

2 A. It is.

3 Q. So again, is it that the employer EIN was issued after tax
4 year 2020? Because that's the tax return year we're talking
5 about, right?

6 A. Correct.

7 Q. All right. Now, if -- in terms of Government's Exhibits
8 224 and 225, are these the associated returns for those two
9 rows on this spreadsheet, 5 and 6?

10 A. What was the question?

11 Q. Were Government's Exhibits 224 and 225, which are probably
12 in the binder --

13 MS. CONNORS: Okay. And, Ms. Kelley, if you could
14 give it back to the paralegal, please.

15 And if we can pull up Exhibit 224.

16 BY MS. CONNORS:

17 Q. All right. And for Exhibit 224, are we talking about a
18 tax return filed under Social Security Number 0540?

19 A. Yes.

20 MS. CONNORS: And, Ms. Wilson, if you'll go to
21 Page 14 of that exhibit.

22 BY MS. CONNORS:

23 Q. And in terms of the last four of the EIN used for this
24 W-2, what is it?

25 A. 7540.

1 Q. Okay.

2 MS. CONNORS: And, Ms. Kelley, will you put it back
3 with me, please?

4 BY MS. CONNORS:

5 Q. Okay. And so, Mr. Davis, we're going now to Government's
6 Exhibit 220 again. Looking at Row 7, now for Row 7, are we --
7 is -- are we looking again at a filing using the
8 Social Security number ending in 6010?

9 A. Yes.

10 Q. Okay. Now, in terms of the status this time, what was the
11 status?

12 A. Succeeded agency.

13 Q. Okay. And here, is there only the one return with IRS,
14 there's no accompanying state tax return?

15 A. Correct.

16 Q. And is it still for tax year 2020?

17 A. It is.

18 Q. Now, if you can look at the timestamp there in relation to
19 the two returns that we just talked about, the received
20 timestamp was February 12th of 2021 at 6:15 p.m.; is that
21 right?

22 A. Yes.

23 Q. Okay. And that's what appears in Rows 5 and 6. Is that
24 the return that we just looked that had the Social ending in
25 0540?

1 A. Yes.

2 Q. Now for Row 7, using Social Security number ending in
3 6010, what is the timestamp?

4 A. February 12th, 2021, 6:37.

5 Q. Approximately how much time later?

6 A. 22 minutes. Yeah. A little less than 22.

7 Q. Okay. And now since this one went -- says succeeded, does
8 that mean no error message?

9 A. Correct. It means the federal agency accepted the filing.

10 Q. Okay. And does this return list the Houston, Texas,
11 address? Again, it would be the row in yellow.

12 A. It does.

13 Q. And taxpayer date of birth that was transmitted,
14 September 8 of 1975?

15 A. Correct.

16 MS. CONNORS: And, Ms. Kelley, if you will put it
17 back at the paralegal for me.

18 And if you can pull up Government's Exhibit 226,
19 please.

20 BY MS. CONNORS:

21 Q. Now, Government's Exhibit 226, does this correspond to
22 that Row 7 on the spreadsheet?

23 A. Can I see the spreadsheet again?

24 Q. Absolutely.

25 MS. CONNORS: I'm sorry, Ms. Kelley. Could you

1 switch us back to the spreadsheet, please.

2 BY MS. CONNORS:

3 Q. So for the return for Row 7, Social Security Number 6010?

4 A. And can you scroll over?

5 Q. Yes.

6 A. Yes.

7 Q. Okay. So 226 relates to that Row 7?

8 A. It does.

9 Q. Okay.

10 MS. CONNORS: Now, I apologize, Ms. Kelley. If you
11 could switch us back to the paralegal desk.

12 And if you'll pull up Exhibit 226.

13 BY MS. CONNORS:

14 Q. Okay. So here, do you see the Houston address again and
15 the Social Security number ending in 6010 for this return?

16 A. I do.

17 Q. Okay.

18 MS. CONNORS: And, Ms. Wilson, if you will go to
19 Page 25 of this exhibit. And if you will zoom in on that top
20 information.

21 BY MS. CONNORS:

22 Q. Now, for this 2020 W-2, does it still identify the
23 employer as Kremkov Industries?

24 A. It does.

25 Q. In regards to the EIN, does it have an EIN ending in 1377?

1 A. It does.

2 Q. Is that a different EIN than we've seen before?

3 A. I'd have to look back.

4 Q. Sure. If you would look back, you can look back at
5 Exhibit 221.

6 MS. CONNORS: If you will pull up Page 25 of that.

7 THE WITNESS: Yes, they're different.

8 MS. CONNORS: Okay. And can you go back to 226,
9 please. And go to Page 20.

10 BY MS. CONNORS:

11 Q. And for this return, is Texas identified as the place of
12 residence for the entire year?

13 A. It is.

14 Q. Okay.

15 MS. CONNORS: And, Ms. Kelley, if you can switch back
16 to me, please.

17 BY MS. CONNORS:

18 Q. Okay. So for Rows 8 and 9 --

19 Woops, I apologize. I'm not scrolled over all the
20 way. There we go.

21 For 8 and 9, are these also listed as succeeded?

22 A. They are.

23 Q. Now, for this return -- these two returns, which again,
24 I'm mostly just going to focus on the federal return that's in
25 Line 8, does it -- is this also for tax year 2020?

1 A. It is.

2 Q. And is this under the Social Security ending in 0540?

3 A. It is.

4 Q. Now in terms of timing, when was this return transmitted
5 through TurboTax's system?

6 A. February 13th, 2021 at 8:42.

7 Q. Is that a.m.?

8 A. A.m., sorry.

9 Q. So essentially the next morning from what's reflected in
10 Row 7?

11 A. Correct.

12 Q. Now, since this return succeeded, does that mean it went
13 through to IRS?

14 A. It did. IRS accepted this return.

15 Q. And I'm just going to scroll over. So does -- this return
16 has the Douglasville address on it; is that right?

17 A. It does.

18 Q. Okay. And does it have a date of birth of September 10,
19 1975?

20 A. '79.

21 Q. Oh, I'm sorry, yes, '79?

22 A. Yes.

23 Q. Okay. And since this one went through, there is going to
24 be no error message to the right?

25 A. Correct.

1 Q. Okay.

2 MS. CONNORS: And, Ms. Kelley, I think this is
3 hopefully the last time, maybe, in terms of if you could
4 switch that back.

5 Okay. And if we can pull up Government's Exhibit 27.

6 MS. WILSON: 227?

7 THE COURT: I'm sorry. Yes, 227.

8 BY MS. CONNORS:

9 Q. Okay. And is this the return associated with that
10 federal -- that last federal return?

11 A. Yes, it appears to be.

12 Q. And for this one, the -- is the Social ending in 0540?

13 A. It is.

14 MS. CONNORS: And then if we can go to -- uh-oh. I
15 don't have my page number listed. Let's see. If you can
16 scroll down for me. I think it's going to be around Page 17.
17 Keep going. Let me find that page number. My apologies.

18 All right. I want to make sure that we don't have to
19 search. Okay. Page 14. Oh, sorry, you found it before me.

20 BY MS. CONNORS:

21 Q. Okay. In terms of Page 14 of Exhibit 227, what is the EIN
22 number that's listed?

23 A. 83-1821377.

24 Q. And if you need to look back at Exhibit 226, I'm going to
25 ask if that's the same EIN that was used in Exhibit 226 that

1 we went through the return?

2 A. Could I look back, please?

3 Q. Yes.

4 MS. CONNORS: If we go to 226 and then it should be
5 Page 25.

6 BY MS. CONNORS:

7 Q. Okay.

8 A. And that is the same.

9 Q. Okay. Now in terms of those earlier attempts, do they
10 have a different EIN number, the ones that were rejected?

11 A. Yes.

12 Q. And to confirm, Mr. Davis, all of the returns that we just
13 went through, including the ones that succeeded, all of those
14 were transmitted electronically?

15 A. They were.

16 Q. So what, does that mean they went over the Internet?

17 A. It does.

18 Q. And does Intuit or TurboTax have servers that they use to
19 receive this kind of data?

20 A. We do.

21 Q. And can you give us an idea about how that process works?

22 A. Yeah. Intuit uses AWS, it's a server -- it's a company
23 that provides infrastructure and hardware to companies like
24 Intuit. They have data centers across the country.

25 And basically, Intuit enters into a contract with

1 them and we use that hardware and their services to put our
2 software and programs on it.

3 Q. Okay.

4 A. That's -- that's the gist of it.

5 Q. Okay. And how many servers do y'all use for the TurboTax?

6 A. Altogether, there's probably maybe 60.

7 Q. Okay. And what about for the data centers?

8 A. How many data centers? We use two data centers.

9 Q. Okay. And are those in different states than Georgia?

10 A. They are. There's one in Ohio and one in Oregon.

11 MS. CONNORS: And, Your Honor, we do have a
12 stipulation to read into the record.

13 THE COURT: Okay.

14 MS. CONNORS: As to Counts Two and Three of the --

15 THE COURT: Oh, hold on a second.

16 Remember, this is a fact that the parties agree on
17 and that you have to accept as established.

18 Okay?

19 This is a fact that is accepted by the parties as
20 established, so listen to it carefully.

21 MS. CONNORS: Thank you, Your Honor.

22 As to Counts Two and Three of the third superseding
23 indictment, the wire transfers described therein were
24 transmitted by means of wire communication and interstate
25 commerce.

1 Thank you, Your Honor.

2 There you go. Thanks.

3 CROSS-EXAMINATION

4 BY MR. FINLAYSON:

5 Q. Good afternoon, Mr. Davis. Good afternoon. I just have a
6 few questions for you.

7 MR. FINLAYSON: This -- if I could see the 220 that's
8 on the government's computer. No?

9 I'm sorry. Madam Clerk, can I get 220 that's on the
10 government's computer.

11 MS. CONNORS: The paralegal table.

12 COURTROOM DEPUTY: So it's at the podium.

13 MR. FINLAYSON: Right.

14 MS. CONNORS: Oh, sorry.

15 MR. FINLAYSON: Thank you. Wonderful.

16 BY MR. FINLAYSON:

17 Q. This document we've been talking about for a good while
18 now, that's an Excel spreadsheet, right?

19 A. Yes.

20 Q. And did you prepare that document?

21 A. My team did, yeah.

22 Q. And so that is the --

23 A. Or part of the team.

24 Q. Okay. So it's a summary of a variety of other documents,
25 right? Is that fair?

1 A. No, this is data taken right from our databases.

2 Q. So that -- was this -- was this -- let me ask it this way:
3 Was that automatically generated by your databases?

4 A. No. So the data is in the database per the subpoena
5 requirements, we do a search based on what the court's asking
6 us to look for. And then we search the databases and this was
7 what was returned from those searches.

8 Q. But was it returned in one single spreadsheet or was it
9 copied over from the individual documents?

10 A. No. It was put right into a spreadsheet. The data pulled
11 from the database and put into a spreadsheet.

12 Q. And how is it pulled? Is it copied or is it somehow
13 automatically populated?

14 A. So it's a -- it's a -- it's done by the servers. It's --
15 it's code that actually talks to the database, makes a request
16 for the data in the database, using a search. The database
17 responds providing that, that data is stored on a server and
18 then -- and then we pick it up and give it to you, the
19 subpoena request.

20 Q. There's a whole lot in that. I'm going to have to help
21 you take me through it.

22 Did you -- so do you have to like build a code to
23 make this spreadsheet happen?

24 A. That's -- build a code. Well, everything is built. I
25 mean, you know, everything's been built to do this, yes.

1 Q. So is it like SAS or some type of program like that that
2 would --

3 A. No, it's -- it's not. It's a service. I'm not a
4 programmer, but it's a service designed to read the database
5 with a query and have it return the data.

6 Q. And so that program that some programmer, not you, built
7 in your office gathered this data somehow and put it into this
8 Excel spreadsheet?

9 A. Yeah, I would -- I would say it talks to the database and
10 the database responds, putting that -- putting that data in a
11 spreadsheet form.

12 Q. Okay. So nobody went in individually and copied and
13 pasted and copied and pasted?

14 A. No, it's all automated. And it's -- the database is huge,
15 first of all, so it takes some time to look through the entire
16 database for the query.

17 Q. Okay. I think I've got it.

18 And we are looking at I guess it's eight entries that
19 are on this spreadsheet?

20 A. Yes.

21 Q. And it looks like there were three returns -- three
22 returns that were accepted, five that were rejected; is that
23 right?

24 A. Yes, that's what I see.

25 Q. Now, you're just on the back end, you're -- you're -- you

1 are just looking at the data after somebody hits submit and it
2 comes over to TurboTax, right?

3 A. So the data is sent directly to the electronic filing
4 engine. I don't -- looking at it is not a thing.

5 But it goes into the system and it starts being
6 processed to be able to be transmitted to the agency and then
7 to talk to the agency to get the response from the agency.

8 Q. And is it fair to say you're not there or present at all
9 on the front end when somebody's putting data in?

10 A. Correct. The electronic filing engine is after TurboTax.

11 Q. Okay.

12 A. That's where this data came from.

13 Q. So you don't -- you don't actually know who put that data
14 into the system at all, right?

15 A. No, there's no way to tell. We know that somebody logged
16 in with a TurboTax account and entered this data.

17 Q. And that -- so I guess there are probably IDs and
18 passwords for that?

19 A. There's an identity system that TurboTax uses. And so to
20 log in, you have to be able to be that person, you have to
21 have the information to log in.

22 Q. You can share -- that information can be shared, right?

23 A. Yes.

24 Q. So if someone -- like if I had your password and your user
25 identity, I in theory, could log in as you and file your

1 taxes?

2 A. Well, if there was a secondary authentication to your
3 phone, you wouldn't be able to do that.

4 Q. Did you have that back in 2021?

5 A. I do not know.

6 Q. You don't know. Because we have it now, right, we have
7 that now?

8 A. Absolutely.

9 Q. But 2021, you're not sure?

10 A. I'm not sure.

11 Q. Okay. So you testified on direct that the TurboTax
12 program is designed to be user-friendly, right?

13 A. It's designed to assist the user and hopefully in a
14 friendly way.

15 Q. In fact, you even mentioned like if it -- it's designed if
16 there -- if a return is rejected, it's designed to spit it
17 back to the user so they can make corrections and resubmit; is
18 that right?

19 A. Yeah, it's -- the idea is that the error message back from
20 let's say the IRS, we want to make sure that the customer
21 understands what the error is. And if we have like some step
22 by step stuff to provide them, we -- that's given to them also
23 in the app.

24 Q. So the system is built for those corrections to be made by
25 the user, right?

1 A. Correct.

2 Q. So it's not -- there's nothing surreptitious about getting
3 a rejection notice and then sending it -- making a change and
4 sending it back in?

5 A. No. Not uncommon, either.

6 Q. Not uncommon, right?

7 A. Correct. Correct. I'm sorry.

8 Q. Yeah, it's -- people all day long are struggling with
9 these things, right, there's not easy?

10 A. The system is designed for that, correct.

11 Q. Okay. And I gather you're -- you're then -- you have your
12 computer system and they were dealing also with the IRS
13 computer system, right?

14 A. I don't know what you mean by mine.

15 Q. Well, Intuit's. You have the Intuit system.

16 A. Oh, gotcha. Yes. There's -- Intuit hosts their own
17 service, that's what the EFE's runs on, Intuit hosted servers.
18 And we connect to the IRS, which has their own systems.

19 Q. Okay. And that system is a little old, for lack of a
20 better word?

21 A. I do not know what their system is and they keep it quite
22 a secret.

23 Q. It's -- let's say this, it's not perfect, is it?

24 A. I wouldn't -- I wouldn't know how to know if it was
25 perfect, but I would assume no.

1 Q. Okay. And you mentioned before that there are sometimes
2 in your -- even on your end, on the Intuit side, will there be
3 some errors and particularly you mentioned on like filing
4 dates or filing stamps?

5 A. There can be transmission errors --

6 Q. Okay.

7 A. -- that -- and there can also be errors with Intuit
8 communicating with the IRS that can be caused by multiple
9 things. And those -- and those failed transmissions are then
10 manually retransmitted to the agency. So they require some
11 intervention. It's a very, very small amount of filings
12 compared to how many are filed, but, yeah, that can happen.

13 Q. Okay. And the filings that happened in this case, you
14 don't have any real-time knowledge of them, do you? Did you
15 have any realtime knowledge of the filing -- of like the
16 filings that are reflected on this spreadsheet were you --

17 A. Real-time meaning?

18 Q. Were you there on, you know, February the 6th?

19 A. Oh, did I see those filings filed.

20 Q. Right.

21 A. No.

22 Q. So you can't say when any of these actually came through,
23 can you?

24 A. I can. I can look at the -- I can look at the record and
25 I know that the records kept in the normal course of business

1 are accurate.

2 Q. Okay. But besides looking at the records, you weren't --
3 there's no way you would have actually been in the room to see
4 it come across, would you?

5 A. They're coming back, you know, hundreds per second. So,
6 no, I wouldn't have been able to see if it went by in front of
7 me on a screen.

8 Q. Okay. Okay. You mentioned that -- you went through there
9 some different EIN numbers listed on different returns; is
10 that correct?

11 A. Yes.

12 Q. And the one -- I guess the one that went through was the
13 EIN number ending in 1377?

14 A. I believe so. Sorry, I'm not --

15 Q. This was accepted by the IRS?

16 A. Yeah, I believe so. That's what we confirmed.

17 Q. And before you had mentioned that I guess the error code
18 was the EIN number had to be the wrong one, because it didn't
19 exist -- that EIN number didn't exist at the tax year that the
20 earlier tax return was filed, right?

21 A. That's what the -- that's the error the IRS provided.

22 Q. Okay. So then the user put in the 1377, and that was --
23 that went through and that was successful?

24 A. Apparently, yes. The IRS accepted the entire return.

25 Q. Okay.

1 MR. FINLAYSON: That's all my questions, Your Honor.

2 THE COURT: Any redirect?

3 MS. CONNORS: No, Your Honor.

4 THE COURT: All right, sir. You can step down.

5 Thank you very much.

6 THE WITNESS: Thank you.

7 THE COURT: Who's up next?

8 MS. CONNORS: I'll just grab my computer.

9 MR. EVERT: The government calls John Horner.

10 THE COURT: Okay.

11 - - -

12 JOHN HORNER,

13 A witness herein, having been first duly sworn, was examined
14 and testified as follows:

15 - - -

16 COURTROOM DEPUTY: Thank you.

17 For the record, will you please state and spell your
18 first and last name?

19 THE WITNESS: John Horner, J-O-H-N, H-O-R-N-E-R.

20 COURTROOM DEPUTY: Thank you. You may be seated.

21 THE COURT: Any relation to Bob Horner?

22 THE WITNESS: No, but I watched him when I was a kid.

23 THE COURT: Yes, me too. I was hoping maybe.

24 THE WITNESS: I'm sorry to disappoint you.

25 THE COURT: I'm sure you're fine. It's going to be

1 all right.

2 DIRECT EXAMINATION

3 BY MR. EVERT:

4 Q. Good afternoon, Mr. Horner.

5 A. Good afternoon.

6 Q. Where do you work?

7 A. I work at Gables Residential.

8 Q. And what is Gables Residential?

9 A. So we are a company that builds apartment complexes. We
10 own and operate and we develop them.

11 Q. How long have you been with Gables Residential?

12 A. Ten years.

13 Q. And what's your title there?

14 A. Director of construction.

15 Q. So we're going to display on the screen Government's
16 Exhibit 202, which is already in evidence.

17 MR. EVERT: Could we please put that up. And if we
18 could please turn to Page 2 at the bottom of the page.

19 BY MR. EVERT:

20 Q. Could you please read the date next to where it says sign
21 here.

22 MR. EVERT: And we'll zoom in on that. Thank you.

23 BY MR. EVERT:

24 Q. Okay.

25 A. It says February 12th, 2021.

1 MR. EVERT: And then if we could go to Page 1,
2 please. And zoom in on the top with the information about the
3 person whose taxes this is.

4 BY MR. EVERT:

5 Q. Would you please read the name of the person who's filing
6 this?

7 A. Carl -- I can't pronounce the name. I'm sorry. Carl
8 Torjagbo.

9 Q. And then two lines down, would you please read the address
10 associated with this individual?

11 A. Yes, it's 2220 Westcreek Lane, Apartment E71.

12 Q. And what city is that in?

13 A. It is in Houston.

14 Q. And the state is Texas?

15 A. That is correct.

16 Q. Are you familiar with the address 220 Westcreek Lane in
17 Houston, Texas?

18 A. I am.

19 Q. How are you familiar with it?

20 A. That's where we built an apartment complex called
21 Gables Crimson.

22 Q. And have you reviewed the records for Gables Crimson?

23 A. I have.

24 Q. And is there an apartment -- is there an Apartment Number
25 E71 at Gables Crimson at 220 Westcreek Lane?

1 A. No, there is not.

2 Q. In Houston. Sorry, I spoke over you.

3 A. That's okay. No, there's not. We don't label our
4 apartments alphabetically.

5 Q. And how long has Gables Residential owned 2220 Westcreek
6 Lane?

7 A. So the property was purchased in 2015.

8 Q. And when Gables Residential purchased 2220 Westcreek Lane,
9 what was there?

10 A. An existing building.

11 Q. And what did Gables Residential do with the existing
12 building?

13 A. We hired a contractor to tear it down.

14 Q. And when was that older building torn down?

15 A. 2017.

16 Q. And then I understand that Gables Residential constructed
17 a new building; is that correct?

18 A. We did. We started in 2018.

19 Q. And how long did the construction of that new building
20 take?

21 A. So it was substantially complete or complete enough that
22 we could have occupancy in it in April of 2020.

23 Q. Did anyone live at 2220 Westcreek Lane while the
24 construction was taking place?

25 A. No, sir. That would not be allowed by the City of

1 Houston.

2 Q. So between 2017, when it was torn down, and I believe you
3 said April 2020 --

4 A. Yes, sir.

5 Q. -- nobody lived there?

6 A. That's correct.

7 Q. And since the new building has opened in April 2020, has
8 an individual named Carl Torjagbo ever resided at that
9 address?

10 A. No.

11 Q. And how about an individual by the name of Karl Delano,
12 has someone by that name ever resided at 2220 Westcreek Lane
13 since it opened in April of 2020?

14 A. No.

15 MR. EVERT: No further questions. Thank you.

16 CROSS-EXAMINATION

17 BY MR. FINLAYSON:

18 Q. Mr. Horner --

19 A. Sir.

20 Q. -- not Bob.

21 A. No.

22 Q. Do you get that all the time?

23 A. I do.

24 Q. Do you live here?

25 A. I do.

1 Q. So you don't live in Houston?

2 A. I don't.

3 Q. Did you ever live in Houston?

4 A. No.

5 Q. So you just looked at records about this address?

6 A. No. I flew there every other week for two years to manage
7 it.

8 Q. Oh, all right. So you have been there?

9 A. Yes, sir.

10 Q. Okay. So if I understand what you're saying is there was
11 an apartment building there that would have had the number
12 E71, right?

13 A. I'm not saying that.

14 Q. You're not saying that. You're saying there is no E71
15 now?

16 A. I'm saying that since Gables Residential owned the land in
17 2015, there has never been an E71.

18 Q. Okay. And the old building was torn down?

19 A. Yes, sir.

20 Q. Okay. The -- I gather you don't -- you're not the
21 property manager of that -- of that residence, are you?

22 A. No, sir.

23 Q. Do you know every resident that's living in the building?

24 A. No. That's why we reached out to our senior VP of
25 operations who does.

1 Q. Okay. Well, let's not repeat what he said, because that
2 will be hearsay. So let's talk about what you know.

3 A. Sure.

4 Q. You obviously -- there -- when people sign a lease for an
5 apartment, they put their name on that lease, right?

6 A. I would imagine. I'm not involved with that process, but
7 that seems logical.

8 Q. Seems logical. And they're supposed to probably put the
9 other people that live in there as well, right?

10 A. Again, I'm not sure.

11 Q. You don't know, okay.

12 So you don't know if somebody has a relative or a
13 guest or you don't know if somebody else has somebody living
14 in their apartment that's not on a lease?

15 A. I don't know.

16 Q. Okay. Does -- and you may not know this, but does old
17 mail still show up for the old addresses?

18 A. I don't know that.

19 Q. Okay. And you don't know that's not the case, I gather,
20 either?

21 A. I don't know.

22 Q. Okay. Have you been in the offices at the new building?

23 A. I've been in the new building many times.

24 Q. Okay.

25 A. And that's where the mail is received.

1 Q. Okay. Have you looked -- do you ever look at that mail?

2 A. No, sir.

3 Q. Okay.

4 MR. FINLAYSON: That's all my questions, Judge.

5 THE COURT: Any redirect?

6 MR. EVERT: Just one brief question.

7 REDIRECT EXAMINATION

8 BY MR. EVERT:

9 Q. On cross-examination, you were asked about whether it
10 would be possible for a relative to live in someone else's
11 apartment.

12 In 2020 or 2021, would it have been possible for
13 anybody to live in Apartment E71 at 2220 Westcreek Lane?

14 A. No.

15 Q. Why not?

16 A. Because it doesn't exist.

17 Q. Thank you.

18 MR. EVERT: No further questions.

19 THE COURT: All right. Can he step down?

20 Thank you very much. Are you still a Braves fan?

21 THE WITNESS: Yes, sir. Went last night.

22 THE COURT: You did? That was a hard game.

23 THE WITNESS: My daughter's first game there.

24 THE COURT: Oh, no kidding. That's wonderful.

25 That's a great place to see a game. I wish that team was a

1 little bit better.

2 THE WITNESS: She was excited nonetheless.

3 THE COURT: Yes. I'd like to pay them not to hit
4 home runs or at least to try not to hit home runs. I wonder
5 what that would do. Anyway, thanks for coming in. I
6 appreciate it.

7 All right. Who is your next witness?

8 MS. CONNORS: Your Honor, the government calls
9 Salvatore Hazel.

10 THE COURT: I think Bob Horner was the best player in
11 major league baseball and they refused to pay him \$2 million
12 that year. That's how tight it was back then.

13 - - -

14 Salvatore Hazel,

15 A witness herein, having been first duly sworn, was examined
16 and testified as follows:

17 - - -

18 COURTROOM DEPUTY: Thank you.

19 For the record, will you please state and spell your
20 first and last name?

21 THE WITNESS: Should I sit down?

22 THE COURT: Yes.

23 THE WITNESS: My name is Salvatore Hazel. That's
24 S-A-L-V-A-T-O-R-E, Hazel, H-A-Z-E-L.

25 COURTROOM DEPUTY: Thank you.

1 DIRECT EXAMINATION

2 BY MS. CONNORS:

3 Q. Good afternoon, Mr. Hazel.

4 A. Good afternoon.

5 Q. Will you -- oh, I'm sorry. Do we need to get you a
6 different bottle of water?

7 A. No, no, no. That's good.

8 Q. Mr. Hazel, can you tell the jury where you're currently
9 employed?

10 A. I work for the Internal Revenue Service.

11 Q. And how long have you been with the
12 Internal Revenue Service?

13 A. October will be 16 years.

14 Q. And what has been some of your positions with the IRS?

15 A. My first year with the Internal Revenue Service, I was a
16 customer service representative. I answered the toll-free
17 number. Taxpayers would call the 1-800 number, have questions
18 about their account, status of their refund and I would try to
19 assist them over the phone. I did that for one year.

20 And then I moved on to the taxpayer assistance
21 center, so much like helping taxpayers over the phone, now
22 taxpayers had the option to walk into one of the assistance
23 centers and speak to someone face-to-face. There we were also
24 allowed to accept payments, provide transcripts, forms,
25 instructions, along with trying to assist on any other

1 questions they had with their account. And I did that for
2 five years.

3 After that, I moved on to the taxpayer advocate
4 service. So the taxpayer advocate service is basically the
5 1-800 tax help that you hear all of those commercials about,
6 that's what the taxpayer advocate service is for the IRS. it's
7 a division put in place to help bridge the communications
8 between taxpayer and IRS.

9 You were promised your refund in six weeks, it's been
10 six months, you haven't heard anything, you know, no letters,
11 can't get anybody on the phone. You can reach out to the
12 advocates and we kind of like bridge that communication and
13 just try to help resolve any issues you have with the IRS. I
14 did that for five years.

15 And now I'm in my current position as a court witness
16 coordinator.

17 Q. Thank you, Mr. Hazel.

18 A. You're welcome.

19 Q. So and are you familiar with some tax filings related to
20 Carl Torjagbo and other tax information related to him and
21 Kremkov Industries?

22 A. Yes, I am.

23 Q. And before coming to court today, did you assist with
24 getting certified copies of different IRS documents?

25 A. Yes, I did.

1 MS. CONNORS: Your Honor, I would move to admit
2 Government's Exhibits 201A, 201B, 203, 204, 205 -- well, let
3 me just say 205 through 213.

4 THE COURT: Any objection?

5 MR. FINLAYSON: No objection.

6 THE COURT: All right. Those exhibits are admitted.

7 MS. CONNORS: Thank you, Your Honor.

8 BY MS. CONNORS:

9 Q. And, Mr. Hazel, in terms of the records that you have
10 looked at for this particular case and investigation, have you
11 seen multiple records related to different 2020 Form 1040s?

12 A. Yes, I have.

13 Q. And are those 1040s from multiple sources, such as filings
14 that went through with TurboTax, filings that the IRS
15 processed as well as information -- the 1040s that were
16 submitted with -- to Chase Bank?

17 A. Yes, they were.

18 Q. Now, in terms of those 1040s, are they reporting a good
19 bit of information, such as Social Security number that's on
20 the return, date of the filing, an EIN that was used on a W-2
21 and an EIN on a schedule E?

22 A. Yes, they are.

23 Q. And to assist with your testimony today, was a summary of
24 those filings and a specific summary related to the date of
25 the filing, Social Security number used, the employee

1 identification number listed on the W-2 and the employer
2 identification number listed on the Schedule 3, was that
3 summarized?

4 A. Yes, it was.

5 Q. And prior to coming in today, did you review the records
6 underlying this exhibit, the summary, to ensure accuracy?

7 A. Yes, I did.

8 Q. And then in addition, was a summary of employee
9 identification numbers prepared related to three different
10 employer identification numbers associated with Carl Torjagbo
11 or Kremkov Industries?

12 A. Yes, they are.

13 Q. And in terms of your testimony, would both of those
14 summaries that I've just referred to, which are premarked as
15 Government's Exhibits 503 and 504, would those aid in your
16 testimony today?

17 A. Yes, they would.

18 MS. CONNORS: Your Honor, I'd move to admit
19 Government's Exhibits 503 and 504.

20 MR. FINLAYSON: No objection for them used to assist
21 the witness in the testimony. I don't think they would go
22 into evidence, however.

23 MS. CONNORS: Your Honor, they are summary exhibits,
24 summary exhibits are admissible into evidence. They're not
25 for demonstrative purposes.

1 THE COURT: Okay. You mean whether they'll go back
2 to the jury?

3 MR. FINLAYSON: Correct.

4 THE COURT: Okay. Well, we'll talk about that later
5 under -- is it 1001?

6 MS. CONNORS: 1006.

7 THE COURT: 1006. We'll talk about that in a bit.
8 Okay?

9 But for now, without the defendant's objection, they
10 are admitted.

11 MS. CONNORS: Thank you, Your Honor. Okay.

12 THE COURT: So you may or may not have this document
13 or this exhibit when you go -- what number?

14 MS. CONNORS: 503 and 504.

15 THE COURT: 503 and 504, that's TBD. Okay?

16 MS. CONNORS: Thank you, Your Honor.

17 Okay. And if we could pull up Exhibit 503.

18 BY MS. CONNORS:

19 Q. And, Mr. Hazel, does the IRS keep records of employer
20 identification numbers?

21 A. Yes, it does.

22 Q. And can you explain what an employer identification number
23 is?

24 A. Yes, I can. So an employee identification number, also
25 known as an EIN number, is the business's tax ID number, it's

1 basically the business's Social Security number. And that's
2 used to identify -- the IRS uses it to identify the business.

3 Q. Now, in terms of an EIN, if -- does the IRS obtain data
4 when that EIN is created?

5 A. Yes. An application is sent into the IRS requesting the
6 EIN. The IRS will review the application and either approve
7 and provide an EIN tax ID number to that business or not.

8 Q. Now, if any information is subsequently changed to the
9 EIN, would that be reflected in IRS's systems?

10 A. It should be.

11 Q. And so to give an example, I'm going to have you, if you
12 will, look at the column that has the EIN ending in 1377.

13 And for that EIN, was there a change at one point to
14 some information for this record?

15 A. Yes, it looks like there is a change of the address.

16 Q. And is the change that is reflected here, is that
17 something that you were able to find in the IRS's records
18 related to this EIN?

19 A. Yes, it was.

20 Q. And so in terms of the associated addresses that are
21 listed for this EIN, are the two addresses that are reflected
22 here, are those the only two addresses that you were able to
23 find in IRS's system related to this EIN?

24 A. Yes.

25 Q. And so there is one address kind of at the bottom that is

1 in Douglasville, and there is a date range under it.

2 Was that the date range that that address was the
3 address for this business in IRS's records?

4 A. That is correct.

5 Q. And then did there come a point where there was a request
6 to change the address associated with this EIN?

7 A. Yes, there was.

8 Q. And were you able to see that change request in IRS's
9 system?

10 A. Yes, I was.

11 Q. Did the change -- was that change to put the address for
12 that EIN in Marietta, Georgia?

13 A. That is correct.

14 Q. Now, in terms of this summary, if there had been any other
15 changes to that EIN ending in 1377 regarding business name,
16 establish date or name control, would it be reflected here?

17 A. It should be, yes.

18 Q. Okay. And here, what is the business name for the EIN
19 ending in 1377?

20 A. The business name listed here is Carl D. Torjagbo.

21 Q. And what month and year was this business EIN created?

22 A. The EIN was established in September of 2018.

23 Q. And there's a line for name control that has TORJ. So
24 what's a name control?

25 A. So it's one of the ways that the IRS identifies either an

1 individual or a business. They take the last four letters of
2 the last name, for an individual or for the business.

3 Q. Okay. So because this business name was Carl D. Torjagbo,
4 is that why the name control is TORJ?

5 A. That is correct.

6 Q. Now, did you see any record establishing that the business
7 name for the EIN ending in 1377 was Kremkov Industries?

8 A. I did not.

9 Q. And did you see any kind of change request where at some
10 point that name was changed, added, removed, Kremkov
11 Industries?

12 A. I did not.

13 Q. Okay. And then if you'll look at the second column for
14 8332, what was the establish date for that EIN?

15 A. The establish date for the EIN ending in 8332 is January
16 of 2021.

17 Q. And for the business name, what is the entire business
18 name for this EIN?

19 A. The entire business name is Kremkov Industries, Carl
20 Delano Torjagbo, sole member.

21 Q. Now here what is the name control?

22 A. The name control on this will be that -- off the first
23 name, the Kremkov, which will be KREM.

24 Q. And there's an address in Douglasville listed for this
25 EIN. Now, is that the only address you've -- you found in

1 IRS's system associated with the EIN ending in 8332?

2 A. That is correct.

3 Q. So unlike 1377, did you find any record that the
4 address -- there had ever been an address change request for
5 8332?

6 A. I did not find any address changes or request.

7 Q. And in terms of that address, what does it say is the
8 street address in Douglasville?

9 A. 3081 Leatherleaf Trail, Douglasville, Georgia, 30135.

10 Q. Okay. And if you look at the bottom address under 1377,
11 is there a somewhat similar address but not the same?

12 A. It is not the same.

13 Q. And there is the street name listed as Leatherly instead
14 of Leatherleaf?

15 A. That is correct.

16 Q. And Trail is spelled out under 1377 whereas it appears
17 that there is an abbreviation for 8332?

18 A. That is correct.

19 Q. Okay. Now, for the EIN ending in 7540, what is the
20 business name for that EIN?

21 A. The EIN with the last four digits of 7540, the name is
22 Kremkov Industries, LLC, Carl Torjagbo, sole member.

23 Q. Okay. So for that EIN, are there some differences from
24 8332 in terms of the business name?

25 A. There are some differences in the name, yes.

1 Q. Okay. And what are some of those differences?

2 A. It lists as an LLC, the name Carl Torjagbo is there for
3 the 7540, where in the 8332, it's Carl Delano Torjagbo.

4 Q. And for both 8332 and 7540, what is the establishment
5 date?

6 A. That is also January 2021.

7 Q. And here is the name control the same?

8 A. Yes, it is.

9 Q. And I believe you talked about how the name control is --
10 what it's based on, but is that -- is that consistent that it
11 would be KREM if the company name started with Krem -- or was
12 Kremkov?

13 A. Yes, it is.

14 Q. Okay. And then here, between 8332 and 7540, are the
15 Douglasville addresses the same?

16 A. Yes, they are.

17 Q. Okay.

18 MS. CONNORS: Can you pull up 106 and put it beside
19 503. Do the whole letter. Is there a way to make that one
20 slightly bigger? No.

21 BY MS. CONNORS:

22 Q. Okay. Mr. Hazel, have you -- have you seen this letter
23 before that's Government's Exhibit 106?

24 A. Yes, I have.

25 Q. Now, in terms of this letter, is it your understanding

1 this was submitted to Chase Bank on May 7th of 2021?

2 A. That is correct.

3 Q. Now, could you say what the -- who is this letter
4 purportedly issued to?

5 A. To Kremkov Industries, Carl Delano Torjagbo, sole member.

6 Q. And what is the address that is listed on this letter?

7 A. That would be -- thank you. Thank you -- 3081 Leatherleaf
8 Trail, Douglasville, Georgia, 30135.

9 Q. Okay.

10 MS. CONNORS: And could we slide over 503 possibly so
11 we could see that a little more side by side? There we go.

12 BY MS. CONNORS:

13 Q. Okay. So, Mr. Hazel, what is the employer identification
14 number that is purportedly on this letter?

15 A. The EIN identification -- employer identification number
16 listed on this letter is 83-1821377.

17 Q. So looking at Exhibit 503, is that the EIN that's in the
18 first column?

19 A. That is correct.

20 Q. Okay. And, Mr. Hazel, in regards to 1833, does IRS's
21 system have any information that would be consistent with a
22 letter being issued with 1377 on it but addressed to
23 Kremkov Industries, Carl Delano Torjagbo, sole member, at 3081
24 Leatherleaf Trail, Douglasville, Georgia?

25 A. I could not find any letter.

1 Q. And in terms of the EIN 1377, is the business name for
2 that EIN Kremkov Industries, Carl Delano Torjagbo, sole
3 member?

4 A. No, it is not.

5 Q. And in terms of EIN 1377, has there ever been an address
6 associated with that EIN that says 3081 Leatherleaf Trail, the
7 abbreviation for Leatherleaf Trail, in Douglasville, Georgia?

8 A. I did not find that address, no.

9 Q. You found a somewhat similar address but not the same, is
10 that right, from the one that was identified from September of
11 2018 to June of 2021?

12 A. That is correct.

13 Q. And this notice is indicating that it's issued
14 September 1st of 2018; is that right?

15 A. That is correct.

16 Q. Okay. But in terms of the address and Social -- or, I'm
17 sorry, in IRS's system in September of 2018, this was not the
18 address?

19 A. That is correct.

20 MS. CONNORS: And if you can zoom out of that letter
21 and pull up the text.

22 BY MS. CONNORS:

23 Q. Now, in terms of this letter, is it giving some
24 information related to Form 941s and 940s that would have to
25 be filed?

1 A. That is correct, yes.

2 Q. Okay. And at the top, is it saying that this would be for
3 the EIN ending in 1377?

4 A. Yes.

5 MS. CONNORS: If we can go to Page 2 of Exhibit 106.

6 BY MS. CONNORS:

7 Q. And, Mr. Hazel, there's -- the very bottom line says thank
8 you for your cooperation. But do you see the paragraph right
9 above that?

10 A. Yes, I do.

11 Q. Okay. And you can read that first sentence in that
12 paragraph?

13 A. Your name control associated with this EIN is KREM.

14 Q. Does the IRS have any record of KREM being the name
15 control for the EIN ending in 1377?

16 A. It does not.

17 MS. CONNORS: Let's go to Exhibit 201.

18 BY MS. CONNORS:

19 Q. And, Mr. Hazel, do you recognize this tax return?

20 A. Yes, I do.

21 Q. And in terms of this tax return, what is the
22 Social Security number being used?

23 A. The Social Security number listed on this tax return is
24 771-36-0540.

25 Q. And if we can zoom out -- well, let me first ask you,

1 whose name is on this tax return?

2 A. Carl Torjagbo.

3 Q. And does this tax return list that 3081 Leatherleaf Trail
4 address that we just saw?

5 A. Yes, it does.

6 MS. CONNORS: And if we can zoom out of that part and
7 then show the itemization. Yeah.

8 BY MS. CONNORS:

9 Q. Okay. And, Mr. Hazel, in terms of the wages, salaries and
10 tips, what was the amount listed?

11 A. The amount on Line 1 under wages, salaries and tips, the
12 amount listed is \$9,199,411.

13 Q. Now, in terms of the wages, salaries, that are supposed
14 to -- that are recorded in that section, is that supposed to
15 be what the individual received during the tax year?

16 A. That is correct.

17 Q. And if you can look at Line 8, there's a negative in front
18 of the number, but what's -- what is that number?

19 A. The number listed on 8 is a minus \$9,999,360.

20 Q. And then there is an additional figure in Line 9 that also
21 has a negative in front of it. And what is that number?

22 A. The number listed on line 9 is minus 799,000 -- \$799,949.

23 MS. CONNORS: And if we can go to Page 2 of that
24 exhibit, please. If you will capture that top portion. Thank
25 you.

1 BY MS. CONNORS:

2 Q. Okay. And, Mr. Hazel, you've probably looked at a lot of
3 these, but so that we can walk through it, is there a line at
4 25 that's asking for a federal income tax withheld and then it
5 says from and colon. Below that, there's letters. Is that
6 supposed to be depending on your situation, you fill those
7 out?

8 A. That is correct.

9 Q. So now for this 1040, there's a Line 25A, and what is the
10 number there?

11 A. The number listed on line 25A is \$3,371,641.

12 Q. And then there's also a line for 25C. And what is that?

13 A. That's from other forms or instructions. And that amount
14 listed is \$88,194.

15 Q. Now, in terms of Line 25D, is that supposed to be adding
16 25A, B and C and any of those?

17 A. That is correct.

18 Q. Now, in terms of this figure, \$3,459,834, what is that
19 supposed to reflect?

20 A. That should reflect the taxes paid or withheld.

21 Q. Have you had an opportunity to research the
22 Social Security number ending in 0540 to determine if there
23 were any tax withholdings paid to the IRS in 2020?

24 A. I was able to research the account and there were no taxes
25 paid to the Internal Revenue Service.

1 Q. So that figure is -- there's nothing to suggest that that
2 money was ever paid to IRS?

3 A. Per my research, I could not find any withholdings listed
4 for the -- under that tax ID number for the tax year 2020.

5 Q. Now, Mr. Hazel, can you explain in terms of tax
6 withholdings, how did -- how does that reflect when you are --
7 well, let me see how should I ask you this.

8 If you have tax withholdings, is that what is going
9 to determine in large measure whether is a potential refund of
10 any taxes paid at the end of the year?

11 A. Yes, it does.

12 Q. So how does that work essentially?

13 A. So on a basic W-2, where you receive your paycheck, like
14 every two weeks, you have your income, what you paid, and your
15 withholdings. And the withholdings is the credit that you're
16 getting for paying the taxes.

17 At the end of the year, you file Form 1040, right?
18 It's basically a balance sheet of what you did. You list on
19 the first -- that Line 7 all the income you earned, received,
20 being paid.

21 And there's a chart that says how much tax liability
22 you should have. If your withholdings is more than your tax
23 liability, you have a surplus, you'll get a refund.

24 If your withholdings is below the amount you should
25 have paid, you may owe the IRS some money at the end of the

1 year.

2 Q. Now, does the IRS in terms of tax returns rely on
3 information that the individual is putting into the form to
4 process the tax return?

5 A. So the whole basic tax system, the IRS is trusting that
6 the taxpayer files their return honestly and accurately as
7 possible. So if there's a return on file, and there's a W-2
8 and those numbers match as close as possible together, the IRS
9 won't -- in most cases won't question it at first and will
10 release the refund, as they know people need their refund. So
11 they're instructed by the federal government to try to get the
12 refunds out as soon as possible, because many people are
13 depending on that.

14 Q. And if they're owed the money back, then they -- the IRS
15 wants to gets them that money back as quickly as possible?

16 A. That is correct.

17 Q. Now, if we can look here at the bottom of that screen, as
18 a result of the figures going into this 1040, was there an
19 amount that was stated for a refund?

20 A. Yes, it is.

21 Q. And what was the amount of the refund being requested?

22 A. The amount listed on line 35A is \$3,373,441.

23 Q. And when IRS is processing this return, is it processing
24 it with the assumption that this is accurate information?

25 A. That is correct.

1 Q. Now, could there be some adjustments that IRS is doing to
2 that refund amount?

3 A. There can be.

4 Q. Okay. Now, in terms of 2020, were there kind of some
5 common reasons in terms of prior stimulus payments that there
6 may have been an adjustment in a refund?

7 A. There may be.

8 Q. Can you explain kind of what was going on with stimulus
9 payments at that time?

10 A. Well, during 2020, it was just at the beginning of COVID
11 and the federal government knew that, you know, some people
12 were out of work and so forth. So they started offering some
13 kind of, you know, tax credits, I believe it was a \$600 and
14 maybe \$1,200 and so forth. So they were allowing -- you know,
15 sending the checks to the taxpayers.

16 Q. So if someone claimed a stimulus payment in their tax
17 return but they had actually already received it previously,
18 would that amount get deducted?

19 A. In most cases, it would.

20 Q. Now, in terms of that recovery rebate, was that something
21 that if someone had already received it, it's kind of known in
22 an IRS's system?

23 A. It should be, yes.

24 Q. So in terms of -- did a -- did someone necessarily have to
25 lay eyes on the return to be able to potentially see that that

1 refund amount had already been -- had already been obtained --
2 I'm sorry. Not the refund amount. That the stimulus payment
3 had already been paid by IRS?

4 A. I believe so, yes.

5 MS. CONNORS: And if we can zoom out of that. And if
6 you will go down to the section that says sign here.

7 BY MS. CONNORS:

8 Q. Now, on the IRS tax return, there is a sign here. And you
9 were just testifying that IRS is relying on the information to
10 be accurate.

11 Does IRS even require that someone signs their tax
12 return saying under penalties of perjury, you declare that I
13 have examined this return and accompanying schedules and
14 statements and to the best of my knowledge and belief, they
15 are true, correct and complete?

16 A. Yes, that is correct.

17 Q. Does the IRS rely on the person signing the tax return and
18 attesting under penalty of perjury that their tax return is
19 correct?

20 A. That's correct. It's one of the reasons why the IRS
21 requires that you sign your tax return.

22 Q. And now here, is this -- does -- does it essentially end
23 up with an electronic signature?

24 A. That is correct.

25 Q. And how did the electronic signatures work for IRS?

1 A. Well, because you're doing the tax return on your computer
2 over your Internet, you can't put a wet signature on it, like
3 an old-school, paper return. So the IRS could provide you a
4 pin number, a personal identification number.

5 And there's a couple of ways you could establish it,
6 you can pick one out, they ask you a couple of questions. Do
7 you remember your AGI from the year before. If not, then it
8 will go to your date of birth, something like that, just to
9 confirm that they have the right taxpayer. And then they'll
10 provide you a signature pen and that's what's used to sign --
11 electronically sign the tax return.

12 Q. And so those steps of trying to -- of asking for that
13 information, like AGI or date of birth, is that to verify or
14 at least attempt to verify the identity of the taxpayer?

15 A. That is correct.

16 Q. In terms of an IRS tax return, is that only the person
17 whose information is used could get the refund?

18 A. That is correct.

19 Q. Now, even if someone else is filing your return for you,
20 are you still ultimately -- is the individual still ultimately
21 responsible for making sure that the IRS has the correct data?

22 A. So do you mean if a preparer, yes.

23 Q. Yes.

24 A. So if you have a paid preparer who does your return and
25 it's like listed a little bit below that, your paid preparer

1 needs to be listed on the return, right? And he needs to have
2 an identification number, because he's being paid to prepare
3 your tax return.

4 But in the end, the taxpayer is still required to
5 sign that return to say I reviewed all of this. Even though I
6 did not prepare this return, my preparer did, I reviewed this
7 and I'm signing saying, yes, everything -- all the information
8 on here is correct.

9 Q. Okay.

10 MS. CONNORS: And, oh, sorry, if you could pull up
11 that section again.

12 BY MS. CONNORS:

13 Q. Here, was there any indication that someone other than
14 Carl Torjagbo was submitting this return?

15 A. Can you just scroll down a little further? Thank you.

16 Per this return, there's no information listed under
17 the paid preparer, so it would be the taxpayer prepared the
18 return in the eyes of the Internal Revenue Service.

19 Q. Okay. Now, what if someone who is not an official tax
20 preparer, but you wanted to have your friend or parent or
21 someone like that file your return, is it still the
22 responsibility of the taxpayer to make sure that the
23 information is correct?

24 A. In the end, it's always the responsibility of the
25 taxpayer. It's your name on the return, you know, you're

1 signing the return, you're asking for that refund or saying
2 that you owe X amount of dollars.

3 Q. Okay. And even if you look at the sign here section
4 again, after the statement that I read earlier, does it also
5 say declaration of preparer in parentheses, other than
6 taxpayer, is based on all information of which preparer has
7 any knowledge.

8 A. That is correct.

9 Q. Should it be that if someone is filing the tax return that
10 they have, they are getting the information from the
11 individual so that they can file this tax return accurately?

12 A. That is correct.

13 Q. Okay.

14 MS. CONNORS: And we're going to go to Page 11 of
15 this exhibit. And if you can -- yep, if you will go about
16 halfway. That's good.

17 BY MS. CONNORS:

18 Q. Okay. So, Mr. Hazel, you've looked at this before in
19 terms of this particular document. Is it Page 2 of one of the
20 schedules?

21 A. Yes, it's Page 2 of the Schedule E.

22 Q. And a Schedule E, what is that generally reporting in
23 terms of a tax return?

24 A. It could be other incomes or losses under the individual
25 and if any business is established with it.

1 Q. Okay. Now, here, on this tax return -- and, again, this
2 was the one filed under the 0540 Social Security number that's
3 in the top right corner?

4 A. That is correct.

5 Q. And does it list Kremkov Industries as a company name?

6 A. Yes, it does.

7 Q. Now, is there -- and in terms of the employer
8 identification number, is it the one ending in 8332?

9 A. Yes, it is.

10 Q. Now, at the kind of bottom part, there's some information,
11 there's kind of a bold field for passive income and loss and
12 then non-passive income and loss. Were non-passive losses
13 reported?

14 A. Under non-passive income and losses, it looks like Column
15 I, the amount listed on Row A is \$9,999,360.

16 Q. Now, we saw on the first page of this return that there
17 was a figure of over \$9 million that was identified for the
18 wages; is that right?

19 A. That is correct.

20 Q. Now, when these passive -- nonpassive losses are kind of
21 represented in terms of the tax return, what would happen
22 there?

23 A. Well, that number gets carried over to the front of the
24 tax return.

25 Q. Okay. So does it end up essentially being deducted from

1 the wages and earnings?

2 A. Depending on where the numbers are listed, it could lower
3 your tax liability, yes.

4 Q. Okay. In terms of this particular return, was a refund
5 ultimately -- there was a refund claimed that we saw earlier
6 on Page 2 over \$3 million?

7 A. That is correct.

8 Q. So in terms of how that refund amount kind of came about,
9 did it come about because of the identified wages being offset
10 by the non-passive losses?

11 A. That is correct.

12 Q. When that happens, does that essentially decrease the tax
13 liability for someone?

14 A. Right. So what would happen is the losses here offsets
15 the income, the money earned, that 9 million and change, so
16 you have no income really to report because it was zeroed out.

17 But you're also letting the IRS know but I already
18 paid \$3,600,000 in withholdings based on that original
19 \$9 million. But now the \$9 million has been offset and now
20 you have a surplus of the \$3 million.

21 Q. Okay. So because the wages that were reported were offset
22 entirely by the loss, the amount that was claimed as what had
23 been paid to the IRS in tax withholdings, was that entire
24 amount going to be due back?

25 A. That is correct, because there's no tax liability.

1 Q. But again, to confirm, did you find any record that any
2 money was paid to the IRS for Carl Torjagbo in 2020?

3 A. There was no money paid.

4 Q. So that offset that then resulted in that tax refund of
5 over \$3 million was -- it strictly happened because he had
6 listed that he had that tax withholding?

7 A. That is correct.

8 Q. The IRS is only refunding what someone had already paid
9 in. Is that how that process works?

10 A. That is correct.

11 Q. Now, Mr. Hazel, when you have -- I'm not going to go
12 through every page of this tax return, but have you had an
13 opportunity to fully review this tax return?

14 A. Yes, I have.

15 Q. Now in terms of the refund that was generated for this tax
16 return, was it related to that withholding amount that was
17 reported or was there anything in this return to suggest that
18 the defendant qualified for some kind of tax credit where the
19 IRS was going to just give him \$3.3 million?

20 A. Based on the information on this 2020 1040, the refund was
21 generated or came about from the withholdings amount listed on
22 the return.

23 MS. CONNORS: And if we could go to Page 13 of this
24 tax return. And zoom in on the whole W-2.

25

1 BY MS. CONNORS:

2 Q. Now, here, is this where there is the wages identified and
3 that tax withholding number identified?

4 A. That is correct.

5 Q. And nothing on the W-2, this W-2 does not say that the
6 federal tax was zero?

7 A. No, this -- the W-2 has the information from the earnings
8 and the income from that year.

9 Q. Okay. Now, this W-2, it's issued to Carl Torjagbo, and it
10 has the employer as Kremkov Industries.

11 You're familiar with whether or not that is
12 Carl Torjagbo's company?

13 A. Yes, it is.

14 Q. And so in terms of the W-2, it would be someone associated
15 with -- Kremkov Industries would have to be the one to say
16 that this is the amount that was paid?

17 A. Generally that's how it works, yes.

18 Q. And in terms of a W-2, it is supposed to reflect accurate
19 information?

20 A. That is correct.

21 Q. And it's supposed to say the correct wages, it's supposed
22 to say the correct tax withholdings, the other Social Security
23 wages and taxes withheld, all of that should be correct?

24 A. Correct. The importance of the W-2 is that's the main
25 piece of information that a taxpayer uses at the end of the

1 year to file their tax return, income and withholdings.

2 MS. CONNORS: And if we could bring up side by side
3 with this Government's Exhibit 503 again.

4 BY MS. CONNORS:

5 Q. And, Mr. Hazel, we just looked at the Schedule E that
6 listed an EIN for Kremkov of 8332. What EIN is on the W-2?

7 A. On the W-2, if you could blow that up just a little bit.
8 Okay. The EIN listed on the W-2 at Line B is 83-1821377.

9 Q. And then looking at Government's Exhibit 503, is that EIN
10 the one that is in the name Carl D. Torjagbo?

11 A. Yes, it is.

12 Q. And for that EIN, it is not associated with the name
13 Kremkov Industries?

14 A. It is not.

15 Q. Now, have you previously reviewed information from
16 TurboTax?

17 A. Yes, I did.

18 Q. And are you aware that there were rejected tax filings,
19 essentially attempts?

20 A. Yes, there was a couple of rejected filing attempts.

21 Q. Now, were you able to search IRS's system to see if under
22 this Social Security number, 0540, there had been rejected
23 attempts at returns during 2020?

24 A. Yes, I was.

25 Q. And was there -- do those rejections, are they coded?

1 A. Yes, they are.

2 Q. And were you able to compare the kind of rejection or
3 error code in IRS's system with what was reflected in the
4 TurboTax records?

5 A. Yes, I was.

6 Q. In terms of that error, did it relate to the EIN and the
7 tax year?

8 A. Yes, it did.

9 Q. Could you explain that?

10 A. Yes. So basically when you make an attempt, an electronic
11 attempt to file a tax return with the
12 Internal Revenue Service, one of two things is going to
13 happen. They're going either to accept it or they're going to
14 reject it. And for whatever reason or reasons they've
15 rejected, there's codes. And someone like myself, an IRS
16 employee, we can look up the codes. Everything the IRS has is
17 in codes, so you have to look it up.

18 So when I looked up the codes of the two rejection
19 attempts, it said it was based off the EIN listed in the
20 return, which would be the EIN listed on the W-2s.

21 Q. Okay. Now, this return that's in Government's
22 Exhibit 201, is that the one that actually went through to the
23 IRS?

24 A. I believe so, yes.

25 Q. Now, that W-2 lists the 1377 EIN. And looking at 503, was

1 that one established in September of 2018?

2 A. That is correct.

3 Q. Now, this return is in 2020. So the W-2 is listed as
4 2020. Since 2018 is before 2020, would that have created a
5 problem?

6 A. It would not.

7 Q. Now, for the EIN 8332 and 7540, would that create a
8 problem for a 2020 tax return?

9 A. Yes, if those -- either of those EINs are listed, it
10 would -- in most cases, it would cause a rejection because the
11 businesses were established in January of 2021, you're filing
12 a tax return for 2020, so the businesses were established
13 after the tax year.

14 Q. Okay.

15 MS. CONNORS: And if we could pull up Government's
16 Exhibit 504. And if you'll kind of zoom in on sort of the
17 pink area and then that white column on the side, please.

18 BY MS. CONNORS:

19 Q. And you testified earlier that you had had an opportunity
20 to ensure that this information was correct for this summary.

21 A. That is correct, yes.

22 Q. Now, here is this reflecting the rejected returns, the
23 ones that got an error message on TurboTax's system?

24 A. Yes, they are.

25 Q. And looking at the EIN on the Form W-2 for that line, were

1 the rejected returns trying to use the 7540 and the 8332 EIN
2 number?

3 A. That is correct.

4 Q. And does that mean that they got rejected because those
5 EINs were not created until January of 2021, after calendar
6 year and tax year 2020?

7 A. In most cases, that's why, yes.

8 Q. Okay.

9 MS. CONNORS: And if you could please pull back up
10 201 for me. And if you will go to Page 17. Yes.

11 BY MS. CONNORS:

12 Q. And hopefully this won't be too difficult to read. But
13 can you kind of explain, there's sort of two kind of sections
14 here, where there's the bold additional return summary data.
15 Where is the information there coming from?

16 A. That's all coming from when the IRS received a tax return.

17 Q. And is it, when it's being received, transmitted
18 through -- here through TurboTax?

19 A. Correct, through the -- basically the Internet, yes.

20 Q. And then the top portion, is that when the IRS actually
21 got it into their system?

22 A. Yes.

23 Q. And the very top line, what was the receive date?

24 A. The receive date listed is February 13th of 2021.

25 Q. And here, is there the date of birth listed ending in

1 1979?

2 A. Yes, it's September 10th, 1979.

3 Q. And this is for the return with a Social Security number
4 ending in 0540?

5 A. That is correct, yes.

6 Q. And you had mentioned a pin before. Does it indicate what
7 type of pin was used?

8 A. Listed pin type is self-selected online.

9 Q. Does that just essentially mean that the individual was
10 able to make up their own number?

11 A. That is correct.

12 Q. Okay.

13 MS. CONNORS: And if we can pull up Exhibit 212,
14 please.

15 BY MS. CONNORS:

16 Q. Mr. Hazel, can you tell us what -- if -- what this
17 transcript relates to?

18 A. Yes. This is a wage and income transcript, so this would
19 list all the income that was reported to the
20 Internal Revenue Service for one specific tax year for a
21 specific tax ID number for an individual.

22 Q. Okay.

23 MS. CONNORS: And if we can kind of zoom in on that
24 part. Yes, that's probably good.

25

1 BY MS. CONNORS:

2 Q. So here at the very, very top, does this have the
3 Social Security number that you researched?

4 A. Yes, it does.

5 Q. Was it the one ending in 0540?

6 A. Yes, it is.

7 Q. And it says tax period requested, December 2020. Is this
8 only capturing that month and year?

9 A. That's for the entire year ending in December of 2020.

10 Q. Okay. So is that kind of just sort of the IRS's unique
11 way?

12 A. Yes, it is.

13 Q. Now, here -- there it says Form 1099-INT and then payor is
14 PNC bank. What is this reporting?

15 A. So basically, PNC Bank reported to the IRS on a Form
16 1099-INT, interest. And then they have the recipient's name
17 underneath it, Carl Torjagbo. And it would list if there was
18 any amounts paid for interest for that year.

19 Q. So in terms of this particular transcript for 2020, under
20 the Social Security, 0540, if there had been any federal tax
21 withholdings, submitted by a company, would it have been
22 reflected on this transcript?

23 A. That is correct.

24 Q. So this transcript, the wage and income transcript is
25 supposed to capture everything?

1 A. The wage and income transcript is built to report anything
2 listed under the Social Security number, so a 1099, interest,
3 your W-2 withholdings. Even if you had any gambling winnings,
4 it would be like -- under a 1099-G. If you hit the lottery,
5 went to a casino or whatever and the casino reported it to the
6 IRS, that will all be listed there.

7 Q. Okay. And in terms of --

8 MS. CONNORS: If we can back out of that. And if you
9 will scroll to the second page.

10 BY MS. CONNORS:

11 Q. There's two bold headings for Form 1099-INT again. Is
12 that reporting the same thing, interest from a bank?

13 A. That is correct.

14 Q. And if we move to Page 3, is that just kind of the
15 remainder of that 1099?

16 A. That is correct.

17 Q. Now, for -- is this the extent of this transcript in
18 regards to all wage and income for 2020 for looking at the
19 Social Security number ending in 0540?

20 A. This wage and income transcript reflects all income that
21 was reported to the IRS under that tax ID number.

22 Q. Now, if a -- if federal tax withholdings had been paid to
23 IRS, would it appear here?

24 A. Yes, it would.

25 Q. And in terms of W-2, if the W-2 had been -- had gone

1 through to the IRS from a company, would that get reflected
2 here?

3 A. Yes, it would.

4 Q. Now, we just looked at a W-2 associated with the tax
5 return -- I'm sorry, with the Exhibit 201, again for this
6 Social Security number.

7 Can you explain is -- that W-2 that is the data for a
8 W-2 transmitted with a return, is that really the official
9 W-2?

10 A. What -- when you mean official W-2, I mean, there is --

11 Q. Well --

12 A. Per my research, there was no W-2s. Because the
13 information will reflect on the wage and income, but there was
14 a W-2 on the tax return.

15 Q. Okay. Now, if someone is filing a tax return and
16 indicates that they have a W-2, it fills out that information,
17 will IRS receive that information as a W-2?

18 A. That is correct.

19 Q. Okay. So it is not that that W-2 had ever been
20 transmitted before to IRS?

21 A. That is correct.

22 Q. It just sort of gets created and attached, if you will, to
23 the tax return?

24 A. Because it was attached to the tax return, that is
25 correct, yes.

1 MS. CONNORS: Your Honor, I'm not sure if you wanted
2 to take an afternoon break.

3 THE COURT: I do. I do. But I didn't want to
4 interrupt you.

5 Are you almost done with your direct?

6 MS. CONNORS: I do have some more, but this would
7 probably be a good time.

8 THE COURT: All right. Let's take a short ten-minute
9 break, stretch your legs, get some coffee. Do what you want
10 to do and we'll be back in 10 minutes.

11 COURTROOM SECURITY OFFICER: All rise.

12 (Whereupon, the jurors exited the courtroom.)

13 THE COURT: You can step down. Thank you.

14 THE WITNESS: Thank you.

15 (Whereupon, a recess was taken.)

16 THE COURT: I want to make sure that we have time to
17 do the jury instructions, so we're going to stop somewhere
18 around 4:30ish. Okay?

19 (Whereupon, the jurors entered the courtroom.)

20 THE COURT: All right. Y'all can be seated.

21 Go ahead, Ms. Connors.

22 MS. CONNORS: Thank you, Your Honor.

23 I'm sorry. 201A. Can you pull that up?

24 BY MS. CONNORS:

25 Q. And it's hard to see right now. We'll blow it up. But

1 are you familiar with account transcripts?

2 A. Yes, I am.

3 Q. Okay. Now, for this account transcript, does this relate
4 to the Social Security number ending in 0540 that we were just
5 going over the return for?

6 A. Yes, it does.

7 Q. Okay.

8 MS. CONNORS: And if we could maybe go to the top
9 section until maybe you hit transactions.

10 BY MS. CONNORS:

11 Q. And what's the purpose of this account transcript?

12 A. So the main purpose of the account transcript is put in
13 place for the taxpayers. So you can see any kind of
14 transactions that have taken place on your account for that
15 specific tax year.

16 It will show if your tax return was filed, what kind
17 of a filing status you have, were there any adjustments made,
18 were there any payments made or you received a refund.
19 Anything that has taken place, any transaction that's taken
20 place for that specific tax year should be listed on an
21 account transcript.

22 Q. Okay. So for this transcript, is it reflecting the tax
23 year of 2020?

24 A. Yes, it is.

25 Q. Okay. And at the top, there's a form number on the left

1 side, and all the way over, there's 1040. So is this related
2 specifically to the 1040 that was filed in 2020 under the
3 Social Security number ending 0540?

4 A. That is correct.

5 Q. Now in terms of this transcript, is -- you mentioned it's
6 kind of making any adjustments that the IRS had to make
7 related to the refund amount. Would that include like what
8 you talked about with the stimulus payments earlier?

9 A. Yes.

10 Q. And would it also reflect any other changes related to
11 deductions in the amount of the return that -- the refund that
12 was requested?

13 A. Yes, it should.

14 Q. Now, in terms of this transcript, it -- right there, kind
15 of in the middle of the page, has account balance zero.

16 And in terms of the account balance, here there was a
17 refund requested. Was that refund paid out?

18 A. Yes, the refund was issued.

19 Q. So does the IRS then owe the taxpayer money for this
20 return or has the refund already been issued?

21 A. Yes, it has been.

22 Q. Okay. So in terms of account balance, is that reflecting
23 that the IRS has essentially balanced out this account in
24 regards to this tax year?

25 A. That is correct.

1 Q. Now, although it says zero and that refund was paid, is
2 there anything about this transcript that means that that
3 refund was actually owed to the taxpayer?

4 A. It does not.

5 Q. So this is not a sign that the IRS has said, no, actually,
6 we made a mistake and there actually were tax withholdings and
7 so that tax refund should have gone out?

8 A. That's correct.

9 Q. And you just mentioned, was a tax refund issued on this
10 account?

11 A. Yes, it was.

12 Q. Okay.

13 MS. CONNORS: Okay. And if we could pull up
14 Exhibit 201B.

15 BY MS. CONNORS:

16 Q. And in terms of this refund, was it paid by check?

17 A. Yes, it was.

18 Q. And do you see a date on the check? There's a lot of
19 numbers, but does it look like April 23rd of 2021?

20 A. Yes, it does.

21 MS. CONNORS: And so that the jury can see it, can
22 you zoom in? There you go. Okay.

23 BY MS. CONNORS:

24 Q. So this was -- does that mean this check was essentially
25 cut by the U.S. Treasury on or about April 23rd of 2021?

1 A. That is correct.

2 Q. And since this is a check, would it have had to have been
3 mailed?

4 A. Yes.

5 Q. So then would there have been some additional time period
6 for the mailing to occur?

7 A. There could have been, yes.

8 Q. And in regards to the amount of the refund check, is it
9 \$3,366,240.76?

10 A. That is correct.

11 Q. Now, if IRS is going to send out a refund check, does it
12 specifically send out any kind of notice in advance saying
13 we're issuing your check on this date? We're going to put it
14 in the mail on this date and you will receive it on this date?

15 A. If it's just a basic refund check, the IRS, they don't
16 send a letter for every refund they send out.

17 Q. And here, even though it was a large refund -- refund
18 amount, is it still a basic Treasury check?

19 A. It looks -- it appears so, yeah.

20 Q. And I just wanted to get a bit more specific. In regards
21 to this check, we've talked about that the stimulus payments
22 were deducted from the full refund amount that was requested
23 on the tax return.

24 Was anything else also deducted from the tax return?

25 A. I believe there were two offsets. The taxpayer owed money

1 to the Internal Revenue Service for previous tax years, I
2 believe it was either 2013 and '14 or '14 and '15, so it's
3 just standard procedure. If money is owed to the IRS, before
4 they send you your refund, they're going to take their money,
5 all right. And then whatever the remaining amount is what
6 you're entitled to as your refund.

7 So basically it squares out, you no longer have a
8 balance, no penalties, no interest, washed off, remaining
9 amount, that becomes your refund.

10 Q. Okay. Now, in here, you've testified that the
11 defendant -- there is no record of any tax withholdings
12 actually being paid to the IRS in 2020?

13 A. That is correct.

14 Q. So does that mean that if those back taxes were
15 essentially deducted from the refund, but the refund was not
16 owed to begin with, are the back taxes still owed?

17 A. The taxes will be owed, yes.

18 Q. Okay.

19 MS. CONNORS: And if we could pull up Exhibit 202.

20 BY MS. CONNORS:

21 Q. And, Mr. Hazel, you're familiar with an additional tax
22 return for 2020 filed in the name of Carl Torjagbo?

23 A. I am, yes.

24 Q. Now, for this tax return, was there a different
25 Social Security number used?

1 A. Yes, there was.

2 Q. Now, in terms of IRS tax returns, is an individual
3 expected to only file one tax return?

4 A. That is correct.

5 Q. Now, if there had been a mistake or something like that on
6 a tax return, would you be able to maybe file an amended one
7 or corrected one, something like that?

8 A. Correct. Generally, if a taxpayer needs to make an
9 adjustment or made an error, needs to add something else,
10 they'll file an amended return just to, you know, make the
11 adjustment or correction, make the IRS aware, hey listen, I
12 made a mistake, I forgot to include this W-2 or put the number
13 in the wrong spot, this is what the return should look like.

14 Q. Now, if someone filed a tax return, or they tried to file
15 two tax returns using the same Social Security number on both
16 returns, would the IRS accept and process two tax returns that
17 are purporting to be filed under -- for the same individual
18 with the same Social Security number?

19 A. Generally, the IRS will only accept one return per tax ID
20 number.

21 Q. In this circumstance, since there were two different
22 Social Security numbers used, did that make it -- increase the
23 possibility that IRS would actually receive and process the
24 two different tax returns?

25 A. It would make it more possible that the IRS actually

1 accepts the return. But processing, you know, they may take a
2 closer look at it.

3 Q. Okay. But in terms of the acceptance, is that kind of
4 just in terms -- does that mean it's accepted -- in the kind
5 of filing system, it's kind of accepted as a return that was
6 filed?

7 A. Correct.

8 Q. And then the processing is what sort of happens after?

9 A. Correct. That's basically completing the return, going
10 over it line by line saying check, looks good. If it's a
11 refund, send a refund out.

12 Q. So if the same Social Security number was used, the second
13 return may have just gotten rejected.

14 A. That mostly likely would have gotten electronically
15 rejected, because the tax ID number was already used.

16 Q. In terms of this 1040, does it list a Houston, Texas
17 address?

18 A. Yes, it does.

19 MS. CONNORS: And if we can back out of that area.
20 And if you'll go to all of the numbered lines.

21 BY MS. CONNORS:

22 Q. Now, for this, this tax return, were \$9,999,360, was that
23 what was reported as wages, salaries and tips for
24 Carl Torjagbo?

25 A. That is the amount listed on Line 1, yes.

1 Q. Okay. And in terms of the information in Line 8, is there
2 a negative number, negative \$8,999,360?

3 A. Yes, there is.

4 Q. And then in Line 9, there's a figure of exactly
5 \$1 million?

6 A. That is correct.

7 MS. CONNORS: And then if we could go to Page 2 of
8 that exhibit.

9 BY MS. CONNORS:

10 Q. Okay. Now, for this return, we had looked at the
11 Exhibit 201, the tax return under 0540 that resulted in that
12 \$3.3 million check. And it had reported some federal income
13 tax withholdings as well in Line 25.

14 Here, is there also tax withholdings reported for
15 Line 25A?

16 A. Yes, on Line 25A under the federal taxes withheld from
17 your W-2, the amount listed is \$3,365,212.

18 Q. And then is there an additional amount of withholdings
19 from that other form?

20 A. Yes, there's an additional amount listed on Line 25C of
21 \$68,394.

22 Q. So in terms of this return, have you had an opportunity to
23 look to see if the Social Security number ending in 6010, if
24 the IRS had any record of federal tax withholdings being paid?

25 A. There was zero federal taxes withheld from this tax ID

1 number to the Internal Revenue Service.

2 Q. Now, in terms of the overall information in this return,
3 have you had a chance to look at everything before?

4 A. Yes, I have.

5 Q. Similar to the last return that we looked at, does this
6 return also indicate that there were some non-passive losses
7 on a Schedule E?

8 A. I believe so, yes.

9 Q. And before I get -- turn to that page, on this particular
10 tax return under the Social Security number ending in 6010,
11 was a refund being requested?

12 A. The refund amount being requested on Line 35A is
13 \$3,015,573.

14 Q. And in terms of the 1040 here, is it identical to other
15 1040s in the sense of this is a standard form, it still
16 includes the signature requirement and also still includes the
17 information that it's -- you're declaring under penalty of
18 perjury that the information in the return is correct?

19 A. That is correct. This is a standard tax year 2020 1040.

20 Q. And in terms of this return for the electronic signature,
21 is it dated February 12th of 2021?

22 A. Yes, it is.

23 Q. Okay.

24 MS. CONNORS: And if we can zoom out of that so we
25 can see the bottom part.

1 BY MS. CONNORS:

2 Q. Here was there anyone listed as a paid preparer?

3 A. No paid preparer listed on this return.

4 Q. Okay. And if someone was not a paid preparer, was just an
5 unpaid preparer, maybe a friend, someone else who was going to
6 be the person inputting the information for this return, would
7 that have to be based on accurate information?

8 A. Yes, it is.

9 Q. And is it still the responsibility of the taxpayer to
10 ensure that accurate information is being transmitted to the
11 IRS for this return?

12 A. It is always the responsibility of the taxpayer.

13 MS. CONNORS: And if we could go to Page 15 of this
14 exhibit.

15 BY MS. CONNORS:

16 Q. Now, we saw in Exhibit 201 that there was a Schedule E,
17 and specifically, we pulled up Page 2 of that Schedule E.

18 Does this one also indicate that Kremkov Industries
19 is a business in that Line A?

20 A. That is correct.

21 Q. And now for this return is there a EIN that's 7540?

22 A. Yes, it is.

23 Q. On this return, was there also an amount for non-passive
24 losses?

25 A. Yes, there is.

1 Q. And what is that number?

2 A. The amount listed under non-passive losses on Line A under
3 Column I is \$9,999,360.

4 Q. And so, Mr. Hazel, can you explain what happened with this
5 return in regards to -- we just saw that figure of a little
6 over \$3 million being the requested refund amount.

7 Did the same thing happen with this return that
8 happened on the first one in the sense that the non-passive
9 losses entirely offset the earnings?

10 A. That is correct.

11 Q. And as we saw before, this tax return also indicated that
12 there were substantial tax withholdings, over \$3 million in
13 tax withholdings, under the Social Security number 6010?

14 A. That is correct.

15 Q. In terms of that \$3 million refund amount, is that because
16 of the offset of the earnings and the losses, then you're
17 looking at the amount that was claimed as additional
18 withholdings over and above that?

19 A. That is correct.

20 Q. Now, in regards to this tax return, did this tax return
21 end up getting paid out?

22 A. It did not.

23 Q. And why not?

24 A. It could be -- and I'm not certain that the IRS saw --

25 MR. FINLAYSON: Objection. I'm going to object.

1 THE COURT: He can't speculate. You can ask him if
2 there's possibilities, if he knows of any. But he can't
3 speculate. If he doesn't know, he doesn't know.

4 MS. CONNORS: Okay.

5 BY MS. CONNORS:

6 Q. In terms of this particular tax refund, there's -- nothing
7 goes out. Do you know if IRS was able to associate two
8 returns to Carl Torjagbo?

9 A. Based on the tax ID numbers, there's two ID numbers. But
10 the taxpayer is only allowed one ID number, one tax return.

11 MS. CONNORS: And if we can go to Page 25 of this
12 exhibit.

13 BY MS. CONNORS:

14 Q. Okay. And similar to Exhibit 201, in terms of the bottom
15 half of this page, is this the information coming from
16 TurboTax?

17 A. That is correct.

18 Q. And then the top portion, is that the information from
19 when IRS receives the return transmittal from TurboTax?

20 A. That is correct.

21 Q. And for this return, did IRS receive it on February 13th
22 of 2021?

23 A. That is correct, yes.

24 Q. And for this return, was date of birth in 1975 transmitted
25 as part of that data?

1 A. Yes, it was.

2 Q. Now, the signature date that we already saw was on
3 February 12th of 2021; is that right?

4 A. That is correct.

5 Q. Okay. And can that sometimes happen that the return takes
6 a little longer than expected to go from TurboTax to the IRS?

7 A. It -- the return could have been electronically signed by
8 the taxpayer and then transmitted through TurboTax or
9 whatever, you know, service -- software they're using. And
10 there could be -- you know, if they sent it later at night,
11 the IRS is not -- may not receive it until the following day.

12 Q. Okay.

13 MS. CONNORS: And if we can pull up Exhibit 213,
14 please.

15 BY MS. CONNORS:

16 Q. Now, we looked earlier at a wage and income transcript
17 under the Social Security ending in 0540.

18 In terms of this wage and income transcript, is it
19 for the other Social Security number ending in 6010?

20 A. Yes, it is.

21 Q. For -- under that Social Security number, did you find any
22 information about wages and income?

23 A. As you can see, based on the wage and income transcript
24 under that tax ID number, the IRS did not receive any income
25 information for that year.

1 Q. So does that mean no W-2 was recorded by the IRS for that
2 tax year?

3 A. No W-2s, no 1099s, no income reported.

4 MS. CONNORS: And I apologize, I'm going to back up
5 to Page 17 real quick on this one. Oh, I'm sorry, on 202.

6 And if we can zoom in on this. And if we can also
7 pull up Government's Exhibit 503. That should be good. Thank
8 you. Okay.

9 BY MS. CONNORS:

10 Q. Okay. I realized I forgot to show you the W-2 for that
11 tax return we were going over.

12 So on this W-2, is this the same circumstance that we
13 had before, where W-2 information is being reported in the tax
14 return so this kind of form gets filled out and transmitted to
15 IRS?

16 A. That is correct.

17 Q. But the actual transcript of wages and earnings for the
18 Social Security number ending in 6010, there's no record of
19 the actual W-2 coming through?

20 A. No record on file.

21 Q. Is the employer identification number used on this W-2,
22 does it end in the 1377?

23 A. Yes, it does.

24 Q. And in terms of reminding the jury, for the -- that EIN,
25 what was the establish date for the 1377?

1 A. The establish date for that business is September of 2018.

2 Q. But the business associated with 1377 is not

3 Kremkov Industries?

4 A. It is not.

5 Q. And are you familiar -- did you get an opportunity to

6 review the TurboTax records in terms of a prior rejected

7 return that had been filed under 6010?

8 A. Yes, I did.

9 Q. And in reviewing that information, was there an error code
10 similar to what we saw in Exhibit 201?

11 A. Yes, there was.

12 Q. Was that error message related to a different EIN number
13 originally being used on that W-2 that was not issued --
14 that's one of the EINs that was not issued until 2021?

15 A. Yes. The error message was the same as before indicating
16 that the EIN, there was an issue with that.

17 Q. All right.

18 MS. CONNORS: And if we could go to Government's
19 Exhibit 101.

20 BY MS. CONNORS:

21 Q. And, Mr. Hazel, do you see that this relates to a paycheck
22 protection program?

23 A. Yes, I do.

24 Q. And is the business identified as Kremkov Industries?

25 A. Yes, it is.

1 Q. And there is a business EIN, the same one -- one of the
2 ones we've been looking at today, the 7540 listed?

3 A. Yes, it is.

4 Q. In terms of that EIN, have you had an opportunity to
5 research if any tax withholdings, federal tax withholdings
6 were ever paid to the IRS related to employees of that EIN?

7 A. There was no tax withheld and paid over to the
8 Internal Revenue Service.

9 MS. CONNORS: And if we could go to Page 10 of this
10 exhibit.

11 BY MS. CONNORS:

12 Q. And, Mr. Hazel, does this indicate that it's a payroll
13 journal from the month of February, 2020 for
14 Kremkov Industries?

15 A. Yes. That's what it says, yes.

16 Q. And do you see at the top above the bold line that there
17 is an acronym for fed tax?

18 A. Yes, I do.

19 Q. And is fed tax supposed to stand for federal income tax?

20 A. That is correct.

21 Q. And is there also an acronym for FUTA, federal
22 unemployment tax?

23 A. That is correct.

24 Q. FUTA, what -- is there a document that that typically is
25 reported on?

1 A. Yes. The FUTA, federal unemployment tax, the FUTA is the
2 Federal Unemployment Tax Act that's been put in place, so
3 companies with employees -- with employees generally are
4 required to file a yearly form, a Form 940, and they have to
5 pay into it. They're basically help funding the unemployment
6 system.

7 Q. Okay. And in terms of federal income tax withholdings, is
8 there also a form that is supposed to get submitted to the IRS
9 reporting the federal income taxes withheld?

10 A. Yes, there is.

11 Q. And what form is that?

12 A. Generally, depending on the size of the company, anybody
13 more than I believe it's 5 employees or over \$5,000 paid in
14 wages, you're required to file a quarterly tax return, it's
15 the 941.

16 And in the 941, the employer lists the name of the
17 company, tax ID number and so forth, but what it really lists
18 is the number of employees they had for that quarter, the
19 number -- the amount of wages they paid in that quarter and
20 the amount of withholdings that they withheld, your federal
21 taxes that they withheld and paid to the
22 Internal Revenue Service for that quarter.

23 Q. Okay.

24 MS. CONNORS: Now if we can zoom out of that portion.
25

1 BY MS. CONNORS:

2 Q. Just looking here at just this page of this payroll, does
3 it indicate that federal taxes were being withheld from pay?

4 A. Yes, it does.

5 Q. And the FUTA just says zero on this page; is that right?

6 A. Yes, it does.

7 Q. In terms of your research related to the EIN ending in
8 7540, have you been able to see any tax withholdings from any
9 employees associate with that EIN?

10 A. There were no tax withholdings reported to the
11 Internal Revenue Service.

12 Q. And if any taxes had been withheld from employee's pay,
13 would IRS have a record of it?

14 A. Yes, they would.

15 MS. CONNORS: And if we'll go to Page 80 of this
16 exhibit.

17 BY MS. CONNORS:

18 Q. Is there a grand total indicating federal tax, taxes
19 withheld for the month of February 2020 of \$433,043.27?

20 A. Yes, it is.

21 Q. Is that consistent with anything that you have been able
22 to research for 2020 under EIN 7540?

23 A. No, it is not.

24 MS. CONNORS: And if we could go to Page 81.
25

1 BY MS. CONNORS:

2 Q. And here, is it indicating at the top that this would be
3 full year of 2020, federal -- I'm sorry, payroll information?

4 A. Yes, it does.

5 Q. Okay. And here is there also a column for fed tax and for
6 FUTA?

7 A. Yes, there is.

8 MS. CONNORS: And we're going to go down to Page 122.

9 BY MS. CONNORS:

10 Q. Okay. And for the grand totals listed there at the
11 bottom, does this indicate that \$5,096,786.12 was paid to the
12 IRS for federal taxes for employees?

13 A. Yes, it does.

14 Q. Is that accurate?

15 A. That is inaccurate.

16 Q. And in terms of the FUTA, does it indicate \$20,707.31
17 being paid?

18 A. Yes, it does.

19 Q. Is that accurate?

20 A. It is inaccurate.

21 MS. CONNORS: And if we can go to Page 126.

22 BY MS. CONNORS:

23 Q. And here, do you see --

24 MS. CONNORS: I'm sorry. Let's go to 125 for the
25 first page of that.

1 BY MS. CONNORS:

2 Q. Okay. And are you aware that a 1040 had been submitted to
3 Chase Bank in relation to a PPP loan?

4 A. Yes, I was.

5 Q. And this 1040 lists 0540?

6 A. That is correct.

7 MS. CONNORS: And if we can go to Page 129.

8 BY MS. CONNORS:

9 Q. The EIN that was used for this return listed in the
10 Schedule, is it 7540?

11 A. That is correct.

12 MS. CONNORS: And if we can go to Page 141.

13 BY MS. CONNORS:

14 Q. And here, is this a -- the Form 941 that you referenced
15 earlier?

16 A. Yes, it is.

17 Q. Now, have you been able to research whether any 941s were
18 filed?

19 A. Yes, I was.

20 Q. Were any?

21 A. There were no returns filed and received by the IRS.

22 Q. And these returns are reporting amounts allegedly withheld
23 for employees of Kremkov Industries. Is that the purpose of
24 this form?

25 A. That is correct.

1 Q. Is this information in any way consistent with what you
2 were able to research and find in IRS's system?

3 A. I could not find any returns filed and received with the
4 IRS.

5 Q. And, Mr. Hazel, did you have an opportunity to look at
6 some of the 941s associated with this PPP application?

7 A. I was.

8 Q. So to avoid having to actually pull all of them up, but
9 were four issued for each quarter of 2020?

10 A. That is correct.

11 MS. CONNORS: And if we can go to Page 152.

12 BY MS. CONNORS:

13 Q. And was a 940 submitted with the PPP application?

14 A. Yes, it was.

15 Q. And is this 940 consistent with what you were able to
16 research in IRS's system?

17 A. I could not find a 940 on file with the IRS.

18 Q. Okay.

19 MS. CONNORS: And in terms of the information, if we
20 could pull up Exhibit 204.

21 BY MS. CONNORS:

22 Q. And what is this document?

23 A. This is a Form 3050, certification of lack of record.

24 This is basically saying that the company in the middle,

25 listing the company and the tax ID number and the address and

1 the Form 940 and 941s have description of information right
2 underneath there, there are no returns.

3 And to be more specific, if you go down to the
4 bottom, it has between March 31st of 2014 to December 31st of
5 2021, so the first quarter of 2014 to the last quarter of
6 2021, there are no Forms 940s, nor Forms 941s on file with the
7 IRS for that company.

8 Q. Okay. And just to confirm --

9 MS. CONNORS: If we can back out of that.

10 BY MS. CONNORS:

11 Q. -- is this related to the EIN ending in 7540?

12 A. Yes, it is.

13 Q. Did you also do similar research related to the other two
14 EINs that are on the summary, the one ending in 8332 and the
15 one ending in 1377?

16 A. Yes, I did.

17 MS. CONNORS: If we could pull up Exhibit 205.

18 BY MS. CONNORS:

19 Q. For the same timeframe, were you able to find any 940 or
20 941 being filed with the IRS related to Kremkov Industries'
21 EIN ending in 8332?

22 A. I was unable to find any returns on file.

23 MS. CONNORS: And if we can pull up Exhibit 206.

24 BY MS. CONNORS:

25 Q. For the EIN issued in the name of Carl D. Torjagbo that

1 ends in 1377, were you able to find any record of 940 --
2 940s or 941s between 2014 and December of 2021?

3 A. I was unable to find any returns for -- during these
4 periods.

5 Q. Okay.

6 MS. CONNORS: And if we can pull up Government's
7 Exhibit 504.

8 BY MS. CONNORS:

9 Q. And is this a summary? We looked at part of it earlier.

10 A. Yes.

11 Q. Okay. Now, in terms of the kind of different-colored
12 blocks here, we have the 2020 forms, 1040 prepared on
13 TurboTax, the rejected ones.

14 And then in green, they're the two returns that were
15 processed or at least submitted to IRS?

16 A. That is correct.

17 Q. And then finally, we've seen that there was a 1040
18 submitted to Chase Bank in relation to the PPP loan and then
19 we also -- and then are you aware that there was also a 1040
20 that was submitted on May 7th of 2021 to Chase Bank?

21 A. Yes, I was.

22 Q. Okay. Now, looking across at the information, was
23 information changing on these different submissions of the
24 1040s? And I can perhaps be more specific with my question.

25 A. Yes, please.

1 Q. So in terms of the rejected ones, we had looked at those
2 previously, you have the EINs on the W-2s, the EIN of 7540,
3 and then 8332.

4 A. That is correct.

5 Q. Okay. And those are the returns that got rejected and had
6 that error code related to the EIN wasn't even issued in 2020?

7 A. Yes.

8 Q. Okay. But then moving to the two tax returns that
9 actually succeeded in getting transmitted to the IRS, the one
10 that has the Social Security number ending in 0540 as well as
11 the one that we saw that did not get paid out that was -- that
12 ends in 6010, for both of those returns, do they list the 1377
13 EIN on the W-2?

14 A. Yes, they do.

15 Q. And now that EIN had been issued prior to 2020?

16 A. Yes, it was.

17 Q. So neither one of those got rejected?

18 A. That is correct.

19 Q. Now -- but even within those two returns, one has 7540 on
20 the Schedule E and one has 8332 on the Schedule E?

21 A. That is correct.

22 Q. And those are the two that actually got transmitted to
23 IRS, IRS got into their system?

24 A. Yes.

25 Q. Okay. Now, finally if we look at the 1040s that were

1 submitted to Chase Bank, the first one from February 16th,
2 2021, associated with the PPP loan has 7540 listed on the
3 Schedule E.

4 A. Yes.

5 Q. Okay. And you may recall that the EIN on the PPP
6 application itself is that 7540 number.

7 A. Correct.

8 Q. So the EIN on the Schedule E matched what was -- matched
9 the company that was requesting the PPP loan?

10 A. Correct.

11 Q. But on May 7th of 2021, a different 1040 was submitted,
12 still under the Social Security number for Carl Torjagbo of
13 0540, but this time what changes?

14 A. The EIN.

15 Q. And is that the only EIN he had access to that was prior
16 to February 15 of 2020?

17 A. Correct.

18 MS. CONNORS: Thank you.

19 THE COURT: Okay. Cross-examination.

20 MR. FINLAYSON: Thank you, sir.

21 CROSS-EXAMINATION

22 BY MR. FINLAYSON:

23 Q. Mr. Hazel, I have a few questions for you.

24 A. Good afternoon, sir.

25 Q. How are you?

1 So if I understand, there was an EIN with a number
2 ending in 1377, right?

3 A. Yes.

4 Q. And that number was issued back in 2018?

5 A. Yes. I believe September of 2018, yes.

6 Q. Okay. And so that's obviously well before February 15th
7 of 2020, right?

8 A. Correct.

9 Q. So there were other EINs associated with Kremkov and my
10 client, Mr. Delano Torjagbo, there are other EINs as well?

11 A. Yes.

12 Q. And there's nothing wrong with having multiples, is there?

13 A. No.

14 Q. It can be for different companies or you could reorganize
15 a company, it's very -- it's common, right?

16 A. There can be different EINs, yes.

17 Q. Okay. You talked a lot about W-2 payments made into the
18 IRS. You were looking for records at the IRS of payments
19 being made in, correct?

20 A. Do you mean the tax withholdings?

21 Q. Tax withholdings. That's a good word.

22 A. Yes, yes.

23 Q. And that's a big deal, right, that's -- that's how the
24 government gets its money, right, is the tax withholdings.

25 A. And that's how the taxpayer gets credit for their tax

1 withholdings, yes.

2 Q. And so you went -- how did you search for that?

3 A. As an IRS employee, I have access to certain applications,
4 and the IRS master file. And then most times, you use -- you
5 start the search with a tax ID number and the name of the
6 individual or the companies.

7 And you can find different things, was there a tax
8 return filed, was there tax returns received, is -- were there
9 payments made. And as an IRS employee, like I said, I have
10 access to that.

11 Q. So that means when somebody makes a payment to the IRS, it
12 needs to be logged in by somebody under the number that links
13 to the payor; is that fair?

14 A. Right. The IRS requires -- if you're going to make a
15 payment to put your tax ID number on it. If you just send a
16 check to the IRS, they don't know who it belongs to.

17 Q. Right. And there are -- there are multiple ways to make
18 payments to the IRS, right?

19 A. Yes, there are.

20 Q. You can wire money, can't you?

21 A. I believe so.

22 Q. You would have to -- I assume you would have to have the
23 wiring information for the IRS for some recipient to take that
24 money, right?

25 A. I believe so.

1 Q. And have you ever seen that in the -- in the -- in your
2 many years, have you seen money wired in?

3 A. I've seen it electronically transferred over, yes.

4 Q. And I guess you can write a paper check to the IRS?

5 A. Right. And once the IRS receives it, deposits it, makes
6 sure the check is a good check, the taxpayer or the business
7 will get credit for that payment.

8 Q. And that's -- I gather that's like a line person like a --
9 what would you call the person that processes those checks
10 when they come in?

11 A. I don't know. I've never processed checks.

12 Q. So you don't know who does that?

13 A. Someone in the Internal Revenue Service does, but I don't
14 know their title.

15 Q. Okay. And I gather -- do you know what the title of the
16 person would be that would process the wires that come in?

17 A. I do not know their title.

18 Q. Okay. So let's say hypothetically, if you were working
19 for a U.S.-based company in another country, and you wired in
20 money from Europe or from Africa, that would -- I mean, people
21 do -- you do have people expatriates, people that have to wire
22 money back in to pay their taxes, right?

23 A. So you're saying someone making a payment to the IRS?

24 Q. Correct, from another country.

25 A. Okay.

1 Q. And that -- I mean, that does happen, right?

2 A. I believe so.

3 Q. Okay. Have you ever seen how that gets logged in?

4 A. I do not. Once again, I don't process checks or payments.

5 Q. Okay. So many businesses and I guess self-employed

6 people, too, they have to file -- they file quarterly

7 withholding payments, right?

8 A. Are you referring to the Form 941?

9 Q. Not the form itself, just the money. I'm talking about
10 the actual payments for their own taxes.

11 A. Correct.

12 Q. And so they will send either a check or a wire, they'll
13 send that to the IRS in some form?

14 A. Yes.

15 Q. Okay. And that's kind of -- again, it's got to be logged
16 in, right?

17 A. Yes, it does.

18 Q. And by -- it needs to be with the right account number.

19 A. Correct.

20 Q. Okay. And you searched many -- you searched all kinds of
21 numbers for Mr. Torjagbo, right?

22 A. That is correct.

23 Q. And you're saying you didn't find -- you didn't find the
24 money being paid in?

25 A. I didn't find any returns nor any payments made.

1 Q. Okay. Now --

2 MR. FINLAYSON: Can I see 201A? And can we make it a
3 little bigger. Let's stop at the top third. Yeah. That's
4 good. Thank you.

5 BY MR. FINLAYSON:

6 Q. So you talked about this exhibit, this 201A, right?

7 A. That is correct.

8 Q. And let's start at the very beginning. The requested date
9 for this transcript is June the 4th, 2025; is that correct?

10 A. That is correct.

11 Q. And I guess it was cranked out or the response came across
12 on June the 4th, 2025, right?

13 A. That is when I pulled the account, yes.

14 Q. So you actually made this yourself?

15 A. I requested it from the IRS system, yes.

16 Q. Okay. And you said this was a document that was sort of
17 designed for the taxpayer's benefit? Is that what you said?

18 A. Yes, it is.

19 Q. Okay. And this tracking number, is that tracking number
20 just applied to this document, is that the tracking number?

21 A. Yes, that's what it is.

22 Q. Okay. So -- and this is a report for tax period ending in
23 12/31/2020.

24 MR. FINLAYSON: Can we highlight that?
25

1 BY MR. FINLAYSON:

2 Q. So that's -- that's the period you're asking about, right?

3 A. This is specifically for tax year 2020, yes.

4 Q. And you're asking -- again, you're asking this very year,
5 2025 is when you're asking, right?

6 A. On June -- June 4, 2025, that is correct.

7 Q. Okay. And you're requesting the taxpayer, we go down,
8 it's Carl Torjagbo, right?

9 A. Yes, it is.

10 Q. And there's an office address at 1855 Piedmont Road, Suite
11 100?

12 A. That is correct.

13 Q. Okay.

14 MR. FINLAYSON: And if we could take the middle third
15 of the page to zoom. Thank you.

16 BY MR. FINLAYSON:

17 Q. And we see the very first line here. The very first line
18 says account balance. And we go across, we see that account
19 balance is zero, correct?

20 A. That is correct.

21 Q. And then the next line we see accrued interest, that's
22 also zero, right?

23 A. That is correct.

24 Q. And there's no penalty and no accruals?

25 A. That is correct.

1 Q. Okay. We go further down, we see adjusted gross income
2 negative 799,949?

3 A. That is correct.

4 Q. Okay. And that's a -- so that's a tax loss, as we'd say,
5 right?

6 A. That's a negative number, correct.

7 Q. Okay. And then we have tax per return, \$88,194. Is that
8 the amount of tax owed or the --

9 A. Based on the return, yes.

10 Q. Okay. And then we have the processing date of April 26,
11 2021.

12 A. That is correct.

13 Q. Okay.

14 MR. FINLAYSON: Can we see the bottom third or the
15 very bottom after transactions?

16 BY MR. FINLAYSON:

17 Q. And we see the code 806?

18 A. Yes.

19 Q. W-2 or 1099 withholdings?

20 A. Yes.

21 Q. And that number is -- that's a negative, negative
22 \$3,459,835, right?

23 A. That is correct.

24 Q. And then we have credit to your account, we see a \$1,200,
25 that is the -- I guess that's the stimulus money we were

1 talking about?

2 A. That was the stimulus money during COVID, yes.

3 Q. Okay. And then we see a refund issued. I guess that's --
4 again, that's the COVID money, right?

5 A. That's, yeah, the \$1,200.

6 Q. Okay. And then there's another 600, kind of the same
7 thing?

8 A. Correct.

9 Q. Okay. And again, the very top of this, his balance for
10 2022 was zero, right?

11 A. That what it reads, yes.

12 Q. Okay. Now --

13 MR. FINLAYSON: And you can take that down. Thank
14 you.

15 BY MR. FINLAYSON:

16 Q. So W-2s are, by their nature, they're created by the
17 employer, right?

18 A. They should be, yes.

19 Q. So it's not a -- a government agency doesn't make W-2s,
20 right?

21 A. They do not.

22 Q. So if -- so employers make W-2s, send them in if they are
23 for W-2 employees, right?

24 A. That is correct.

25 Q. There are also other kinds of employees, aren't there?

1 A. There could be, yes.

2 Q. There are 1099 employees?

3 A. That is correct.

4 Q. Okay. So 1099 employees wouldn't be getting a W-2?

5 A. No, they would be getting a 1099.

6 Q. A 1099, okay.

7 You talked about the numbers -- and let me -- we have
8 two different -- two main different tax returns we're talking
9 about here, right?

10 Where with the one that paid out and then one that
11 didn't pay out, fair?

12 A. Are you speaking specifically on the 1040s?

13 Q. Yes.

14 A. Yes.

15 Q. Okay. And one was 0610. Is that the right number?

16 Sorry.

17 THE DEFENDANT: 6010.

18 BY MR. FINLAYSON:

19 Q. 6010.

20 A. Okay.

21 Q. And that's the one that didn't pay out, right?

22 A. Is that the one with the Houston address?

23 Q. Yes.

24 A. Yes, that one didn't pay out.

25 Q. And the other one is 0540?

1 A. Correct.

2 Q. And that's the one that paid money, right?

3 A. That issued the refund, yes.

4 Q. Okay. And you talked through this a bit. There were
5 some -- besides the COVID adjustments, there were other
6 adjustments to that return or to that -- to that payment from
7 that return, right?

8 A. That is correct.

9 Q. Because what -- there was basically a reduction of the
10 refund by about \$7,000, right?

11 A. Are you speaking about the offsets for the money owed from
12 the previous years?

13 Q. Correct.

14 A. That is correct.

15 Q. So there was money owed from like 2013 and what was the
16 other year?

17 A. I think it was '14, '13 and 14.

18 Q. So that refund was reduced by the \$7,000 to pay for those
19 old debts?

20 A. I don't think the exact amount, but, yes, they were
21 reduced to pay off previous debts with the IRS.

22 Q. Okay.

23 MR. FINLAYSON: May I have one moment?

24 BY MR. FINLAYSON:

25 Q. One last thing, so when you say negative, the account

1 balance we were looking through?

2 A. The account transcripts, yes.

3 Q. When you see that, when you see negatives on that balance,
4 those are credits, right?

5 A. Under the withholdings, the 806, that's the credit.
6 That's the withholding credit that was reported on the return.

7 Q. Okay. And it actually showed -- it actually says that I
8 think on the transcript, that negatives are a credit?

9 A. It is a credit, yes.

10 Q. Okay. Thank you.

11 MR. FINLAYSON: Nothing further, Judge.

12 THE COURT: Okay. Any redirect?

13 MS. CONNORS: Yes, Your Honor briefly.

14 REDIRECT EXAMINATION

15 BY MS. CONNORS:

16 Q. Mr. Hazel, you were asked about whether there could be
17 different forms of payment related to tax withholdings?

18 A. Correct.

19 Q. Okay. And you were asked about could expats be -- could
20 they make payments to IRS, people who no longer live in the
21 United States?

22 A. I believe so.

23 Q. Okay. But if anyone is making a payment to the IRS, would
24 IRS link that payment based on either an EIN, Social Security
25 number, some kind of information like that?

1 A. Yes. The IRS requires that you put some kind of
2 information on the payment to make sure that they know who to
3 give the credit to.

4 Q. Okay. Now, in this case, what we saw was that, for
5 example, with be a PPP loan, four different 941s were included
6 with that PPP documentation. Did every single one of those
7 have an EIN on it?

8 A. I believe so, yes.

9 Q. So they had -- they actually have an EIN on it. So if any
10 withholdings were actually paid to IRS, it would not have been
11 difficult for that company to list their EIN?

12 A. That is correct.

13 Q. It would match, it should match what is on the 941, right?

14 A. Right. And the business would get credit for those
15 payments.

16 Q. And if someone is a sole proprietor and they're instead
17 using their Social instead of an EIN, they'd have had to put
18 that on the form and they should know that number?

19 A. Right. Your tax ID number should be on the payment.

20 Q. Okay. Now, you were asked about W-2s, that they're made
21 by an employer. And that perhaps there could be other things
22 like 1099s that are done instead of a W-2.

23 Here did we see multiple examples of W-2s?

24 A. It was all W-2 information.

25 Q. And every one of those W-2s said that it was from

1 Kremkov Industries?

2 A. That is correct.

3 Q. And every single one of those W-2s identified an EIN?

4 A. That is correct.

5 Q. And so with that information, you would expect that then
6 that's actually going into IRS's system, if it's accurate?

7 A. If it is accurate, it should go to the IRS.

8 Q. And now you were asked about the negative number in front
9 of that \$3.4 million figure on the transcript.

10 And you have testified a few times over that no
11 withholdings were associated with the Social Security number
12 ending in 0540.

13 In terms of that negative, is it negative on that
14 transcript because the refund was paid out?

15 A. Yes. And it is negative on the transcript because those
16 numbers, the 806, which is the code for federal tax
17 withholdings, are all carried over from the return that the
18 IRS receives. They take the numbers, they carry it over to
19 the account transcript.

20 And then as, you know, time goes by and if there is
21 any further adjustments on that account, you would see it as
22 you go down as transactions if something was done with the
23 account.

24 Q. Okay. So that number is actually because that is the
25 number that was on Carl Torjagbo's 1040?

1 A. Those numbers are just carried over from the return that
2 was sent to the IRS.

3 Q. That does not mean that IRS has determined that they are
4 accurate?

5 A. That is correct.

6 MS. CONNORS: Thank you.

7 MR. FINLAYSON: One quick question.

8 RECROSS-EXAMINATION

9 BY MR. FINLAYSON:

10 Q. Do foreign-based companies have to file 941s?

11 MS. CONNORS: Objection, Your Honor, beyond the
12 scope.

13 THE COURT: Grounds?

14 Overruled.

15 THE WITNESS: I don't know the answer to that
16 question.

17 MR. FINLAYSON: Fair enough. Thank you, sir.

18 THE COURT: Okay. Anything else?

19 MS. CONNORS: No, Your Honor. Thank you.

20 THE COURT: All right. You can step down.

21 Thank you, sir.

22 THE WITNESS: Thank you, Your Honor.

23 THE COURT: All right. That's as far as we're going
24 to go with you-all today. We've got some discussions to go
25 over about jury instructions.

1 Okay?

2 We've got to keep moving on that so that we're ready
3 when the time comes.

4 Okay?

5 Any thoughts, concerns, questions for us?

6 All right. Are you going to talk about this when you
7 get home with anybody? No, right? Continue to abide all of
8 my instructions.

9 Did 8:30 work for y'all today?

10 All right. We'll be here ready to go at 8:30 in the
11 morning.

12 Thank you-all very much.

13 COURTROOM SECURITY OFFICER: All rise.

14 (Whereupon, the jurors exited the courtroom.)

15 THE COURT: All right. Y'all can be seated.

16 Are y'all ready to talk about jury instructions?

17 MR. FINLAYSON: One second.

18 MS. CONNORS: Yes.

19 MR. FINLAYSON: Ready.

20 THE COURT: I gave you all of the redlines so that
21 you would have what you gave me back.

22 MS. CONNORS: I don't think -- did we get a copy of a
23 redline?

24 THE COURT: I thought you got it at lunch.

25 MS. CONNORS: We only got the one snippet.

1 THE COURT: Oh, do you have a big copy for all of
2 them?

3 LAW CLERK: I'll do it.

4 THE COURT: Oh, boy, it's going to take a little bit.
5 All right. We'll have them in a minute. Don't go anywhere.
6 You can do your cleanup.

7 MR. FINLAYSON: Can we go to the bathroom?

8 THE COURT: Yes. I want to try to get this done as
9 soon as we can. Okay?

10 (Whereupon, a recess was taken.)

11 THE COURT: Okay. So you have it with all of the
12 redlines just so you have my edits --

13 Y'all can be seated.

14 -- from where we were before. Okay?

15 I'm going to give you another version that's going to
16 get rid of all of these redlines when we're done, but this is
17 just for your tracking purposes. Okay?

18 MS. CONNORS: Your Honor, does the updated version
19 still have headers on it?

20 THE COURT: No.

21 MS. CONNORS: It just runs as text?

22 THE COURT: I'm going to give them a bunch of
23 different copies. It's not going to have headers or really
24 even page interruptions, things like that. Okay?

25 And I might move them around if there's a better

1 order for them, but I'll give you that the next time. I left
2 it in this order because then you can see what's actually
3 removed rather than just -- what is actually omitted rather
4 than what is moved around. Okay?

5 I think there are very few things to talk about. Let
6 me get to it. I want you-all to spend some time tonight
7 making sure that I've gotten the numbers right.

8 If you look at Page 21, where I think I have gotten
9 the numbers of which charges are which, but I want you-all to
10 make sure of that. Okay?

11 And just because I have the pen, you-all are still
12 responsible for the instructions and making sure what I get
13 out there is correct. Okay?

14 MS. CONNORS: Judge, are you looking at a color
15 version? I can't tell where there was the change for Counts
16 Three and Four -- if the Four is actually marked out or not.

17 THE COURT: Let me see your version.

18 MS. CONNORS: It doesn't have an underline on it
19 right there. I can't tell.

20 THE COURT: Let me see. I think -- yeah, what can't
21 you tell?

22 MS. CONNORS: I can't tell if the Four is marked out.

23 THE COURT: Yeah, the Four is marked out.

24 MS. CONNORS: Okay.

25 THE COURT: It now says Two and Three rather than

1 Three and Four.

2 MS. CONNORS: Okay.

3 THE COURT: Yes, I see what you mean. The Four looks
4 like --

5 MS. CONNORS: Because the line sits right there at
6 that bottom bar.

7 THE COURT: Yes.

8 MS. CONNORS: Thank you.

9 THE COURT: And I'll give you either first thing in
10 the morning or I can email you later today the clean version.

11 Are we going to close tomorrow? Is the government --
12 how are we doing on the case?

13 MS. CONNORS: We have two witnesses left. One is
14 going to be the agent where we're playing the transcript, the
15 recording. And I think that's now about 30 minutes or a
16 little less.

17 MR. EVERT: 35, yeah.

18 MS. CONNORS: For just that, that part.

19 And then afterwards, it will be someone going over
20 the financials, so I would guess we would maybe rest before
21 lunch or it might be right after lunch.

22 THE COURT: Okay.

23 MR. FINLAYSON: And, Your Honor I think our case will
24 take half a day, I mean, if that much. So we could close --
25 I'd love to close on Friday morning, if we could.

1 THE COURT: I can't promise you that. I normally
2 would, but I can't promise you that. We lost almost half a
3 day yesterday. And I worry about going into Monday for that
4 one juror. Okay? But we'll see. Okay?

5 Let's see where we get to tomorrow. All right?

6 Okay. Can we go to aiding and abetting.

7 Do we need that charge?

8 MS. CONNORS: No, Your Honor. I think we can take it
9 out. I mean, it's always charged -- I mean it is the statute
10 that they're going to see in the indictment.

11 THE COURT: Okay. Well, then we ought to leave it
12 in.

13 Let's see. The other one, good faith defense, that's
14 to be determined, right?

15 MR. FINLAYSON: I think so.

16 THE COURT: Okay. Does that apply if he doesn't
17 testify?

18 MR. FINLAYSON: It probably would not.

19 THE COURT: Okay. All right. So the only one to
20 really discuss is knowingly and willfully.

21 I mean, the statute doesn't have willfully in it,
22 right? So what's the grounds to have it?

23 MR. FINLAYSON: I think it's just more of a general
24 intent. I think it goes with the notion or the burden or the
25 element of intent that they have to prove. I think -- I'm

1 sure their cases say that it's covered by other things, but
2 it's sort of the -- that it's not -- well, it's in there. The
3 Eleventh Circuit had it in there. How's that?

4 THE COURT: What do you mean?

5 MR. FINLAYSON: I think the Eleventh Circuit had it
6 in the charge, that's why, that's in the pattern.

7 MS. CONNORS: Yeah, I think that instruction was
8 actually updated within the last year, I believe. And so now
9 where it used to have kind of the separate knowingly section
10 separate, willfully, they tried to combine it, but it's clear
11 from the pattern that you're supposed to choose if it's
12 applicable.

13 I would point out *United States v. Newton*, which is a
14 2019 Eleventh Circuit case. It's an unpublished case, but it
15 came out of our district, and it was one where they were
16 explicit that there is no willfulness requirement for mail
17 fraud and wire fraud. And it would certainly seem that -- and
18 the holding was related to, it's not a word in the statute, so
19 it shouldn't be really adding a burden that is not clear in
20 the statute.

21 THE COURT: I mean, I'm looking at the current
22 pattern charge for bank fraud. I don't see it in there.

23 MR. FINLAYSON: I think it's in the knowingly, it was
24 in the -- you know, there was part of knowingly and willfully.
25 It wasn't in the bank fraud charge. I think it's maybe in the

1 general principles section.

2 THE COURT: I don't see it in the wire fraud. Are
3 you talking about it's in the general definition of knowingly?

4 MS. CONNORS: Yes, Your Honor. It's in the --

5 THE COURT: I know what you mean. In the base
6 offense instruction, it has the definition that has on the
7 same page knowingly and willfully?

8 MS. CONNORS: Yes, Your Honor. And again, that was
9 an instruction that was specifically modified. The
10 instruction number used to be -- I believe it was B9.1 and now
11 you see that there is a 9.1A that replaced it.

12 THE COURT: Yes.

13 MS. CONNORS: And so now it is just trying to put
14 both of those as options in one instruction. However, it's
15 clear if you pull that one up that it's not saying that you
16 have to give willful if you are giving knowingly. It is
17 supposed to be specific to the case.

18 And here, I would add that the government also
19 objects because, you know, willfulness in this sense is not
20 even the general willfulness, because the Eleventh Circuit
21 pattern instructions also talk about that in terms of
22 willfulness, you usually don't need a specific instruction,
23 that it's usually captured within the offense instruction.

24 This is more on the side of things like tax fraud,
25 which is not what we have here. We do not have tax fraud

1 where there is a willful component, we have wire fraud. And
2 although that relates to the submission of tax returns, we
3 have not charged him with an actual tax offense, so the
4 willfulness would not apply.

5 MR. FINLAYSON: And for what it's worth, I think
6 that's probably why they charged it the way they charged it in
7 that probably the burdens are easier in a wire fraud than they
8 are in a tax -- a tax fraud case. So she is correct they
9 haven't charged the tax fraud. But at its heart, those counts
10 are tax fraud counts.

11 THE COURT: Yes. I think this is a good change to
12 the law. The concept of willfully get to the mens rea element
13 of a crime, which in many instances requires some
14 intentionality to do something that the law forbids.

15 But I think that that's subsumed within the other
16 elements of both the wire fraud and the bank fraud charges
17 here.

18 So I'm not going to -- it's also just sort of like,
19 hey, why would I tell them something -- the definition of a
20 word that is nowhere else in the instructions. What would we
21 tell them to do with it?

22 Willfully means this. We might as well, you know,
23 tell them any definition we want. They don't have any way to
24 apply it, they wouldn't know how to apply it, they wouldn't
25 know where to apply it.

1 MR. FINLAYSON: It does feel like a general intent,
2 like a --

3 THE COURT: Well, you're saying that the absence of a
4 willful-type concept makes it a general intent crime?

5 MR. FINLAYSON: Yes.

6 THE COURT: I respect that argument. And I think
7 that that is a -- that in some instances, I think that applies
8 like in some securities fraud cases, it might apply. But the
9 problem here is that the other elements of the crimes charged
10 encompass that idea, a scheme to defraud, for example, in the
11 wire fraud. I think that encompasses that specific intent
12 that's necessary to not make it a general intent crime.

13 So I'm -- and again, unless we're going to rewrite
14 the entire instruction to tell them about some type of mental
15 element of the offense, what the mens rea is, something apart
16 from what's already in the pattern instruction, we're just
17 making it up, so we can't add something like willfulness where
18 Congress hasn't added that word, unless you have a broader
19 argument about criminal culpability that has not been made.

20 MR. FINLAYSON: I'm --

21 THE COURT: You're trying to circle around it because
22 of what I've said, but you haven't made it yet.

23 MR. FINLAYSON: Well, I thought --

24 THE COURT: And I don't know what it would be. You
25 would have to tell me what it is you want to do.

1 MR. FINLAYSON: Yeah, I guess the reason I wanted it
2 in there is because I think it's a general intent. He didn't
3 intend to defraud and so you didn't have intent to defraud
4 somebody or defraud -- yeah.

5 THE COURT: Right. But the problem is if I were to
6 include the term willfully as you have it in your proposal,
7 I'd then have to go back and tell them how to use it. Right?

8 I'd have to then say as an element of this, you must
9 decide that they did whatever willfully, right?

10 And that is not part of the charge. It's not part of
11 the statute, it's not part of the charge. I'm adding an
12 element there. Right?

13 Otherwise, you might as well, I don't know, I can't
14 think of the right word, but you could just give them any old
15 word. It doesn't mean anything unless you tell them how to
16 use it.

17 MR. FINLAYSON: What is --

18 THE COURT: Right. You would have to give them some
19 definition of, I don't know, aglet. And then how would they
20 know what an aglet is and where to use the word aglet? I
21 can't think of another obscure word other than that, but okay.

22 At any rate, I don't see how a definition hanging
23 around helps them in any way.

24 Okay. The real one is -- so we have a two-part for
25 the proposed change to the bank fraud, which is requested 24,

1 and the wire fraud, requested 26.

2 And that is -- so there's two questions, the first
3 one is: Is there any opposition to the change that has been
4 included, which is, as you can see, for example, on Page 48,
5 to obtain the victim's money or property, proving intent to
6 defraud does not require proof that the defendant acted with
7 the intent to leave the victim economically worse off or cause
8 the victim a net pecuniary loss. That's the closest I can get
9 to the language of *Kousisis*.

10 MS. CONNORS: *Kousisis*.

11 THE COURT: *Kousisis*.

12 MS. CONNORS: Yes.

13 THE COURT: Any objection to that language by the
14 United States?

15 MS. CONNORS: Your Honor, only in part. Our position
16 would be that the or caused the victim a net pecuniary loss
17 would not be necessary. And it seems almost like it's saying
18 the same thing.

19 THE COURT: Do you want to leave it at -- it does --
20 leave the victim economically worse off?

21 MS. CONNORS: Yes. Because I think that's language
22 directly from *Kousisis*. And since we were in a circumstance
23 of that coming out, I think that would be appropriate, but
24 yes, our concern would just be the or after.

25 THE COURT: Well, the Supreme Court says both ways in

1 *Kousisis.*

2 MS. CONNORS: *Kousisis.*

3 THE COURT: *Kousisis.* And so it just appears to me
4 as though you're better off telling a jury two different --
5 the same thing, but maybe it resonates with one of them one
6 way and one the other way, but that's fine. I don't really
7 care. So we'll just end that sentence at -- well, let me say
8 this, I know, Mr. Finlayson, you disagree with any of this.

9 MR. FINLAYSON: That's true.

10 THE COURT: But do you like it more with or cause the
11 victim a net pecuniary loss?

12 MR. FINLAYSON: I think you're right. I don't like
13 any of it, so I do object on ex post facto grounds. I like --
14 I mean, I don't like it, but I guess I like what you have
15 better than what she wants, just maybe because she wants it,
16 but...

17 THE COURT: Well, that's not a reason to do it.

18 MR. FINLAYSON: Sorry.

19 THE COURT: That's definitely not a reason to do it.

20 MR. FINLAYSON: No, it's not. It's not a good
21 argument. I'm sorry. But again, you know, I object for ex
22 post facto reasons.

23 THE COURT: Then I will make the edit that the United
24 States requests to the wording of it, as much as I hate ending
25 a sentence with the word off, we will end the sentence with

1 the word off.

2 MR. FINLAYSON: Ooh.

3 THE COURT: Okay. But okay, it's not my writing.

4 MS. CONNORS: I think the Supreme Court did it, too,
5 so maybe you're forgiven.

6 THE COURT: All right. On the ex post facto, it's
7 not that. Ex post facto is a law that's enacted. There's no
8 change in the law here. All this is is an explanation of the
9 law. And it would be weird if what we did was continue to
10 instruct the law in a way that the Supreme Court has said is
11 not right. We're not changing the law in any way. We're just
12 changing how we're explaining it to the jurors. And I don't
13 think that raises ex post facto.

14 I actually think the change is really almost
15 inapplicable in this case, because this is a case that only
16 involves economic loss, so it's really not much of a change at
17 all.

18 MR. FINLAYSON: And just for the record, I would
19 respectfully disagree, and submit that it does change the law,
20 and I think I put this in the -- well, I don't know where I
21 put it.

22 But that argument would be the way the law was
23 charged at the time of the crime would make something legal
24 that the way it's changed since *Kousisis* would make it
25 illegal, and that's my concern, so that -- that's what I'm

1 seeking to avoid and that's why I oppose the charge.

2 MS. CONNORS: To the extent the Court would like the
3 government to respond, the Supreme Court has long made it
4 clear that when they interpret a law, what they are doing is
5 interpreting the law as it has always been.

6 THE COURT: That's right.

7 MS. CONNORS: And so it is always going to be applied
8 retroactively because what they're just saying is all along
9 this is what the standard was, it is never --

10 THE COURT: And if you look at *Carpenter* and those
11 others. I can't remember the other case.

12 MS. CONNORS: Yes, there's quite a lot of them. I
13 think *Rivers V. Roadway Express* was even one that I pulled
14 with some good language on that, but that is always the issue.

15 I will say my only kind of concern is that I do think
16 we want to make it clear that when we're talking about jury
17 instructions, we -- obviously it needs to be instructed on
18 what the law is.

19 And so sometimes there are going to be occasions
20 where the particular maybe eccentricity of part of an
21 instruction doesn't apply to a case, but that doesn't usually
22 mean that we don't still give that instruction. We still give
23 the instruction.

24 We usually give the whole wire fraud instruction. We
25 did that when *Takhalov* was in place, right?

1 So even when it was a case that wasn't an issue of
2 fraud and the inducement in any way, we still gave the
3 instruction, so that would be my only other comment.

4 THE COURT: Yes, but I'm -- aren't I giving you what
5 you wanted?

6 MS. CONNORS: Oh, no, no, no. I'm sorry. The first
7 thing I said was just in case you needed a record from us, so,
8 yes, I agree with Your Honor.

9 THE COURT: All right. Okay. Anything else that we
10 need to talk about on these?

11 MR. FINLAYSON: No, sir.

12 MS. CONNORS: Judge, I think maybe --

13 MR. FINLAYSON: The transcript.

14 MS. CONNORS: I think since we had the 404(b), I
15 don't -- I think we're going to need to add 404(b).

16 THE COURT: We will add that.

17 MS. CONNORS: And then let me see what was my other
18 comment.

19 MR. FINLAYSON: I guess the transcript --

20 MS. CONNORS: And then stipulation as well.

21 MR. FINLAYSON: I don't think the transcript is going
22 to the jury.

23 THE COURT: No, I'm going to add this to the
24 instruction.

25 MR. FINLAYSON: Okay.

1 THE COURT: Okay? I'll add it at the end and then
2 we'll work on -- you know, I guess accomplice, witness with
3 immunity, that doesn't seem necessary, but we'll just cut that
4 out at the end if it's not. Okay?

5 MS. CONNORS: I apologize, Your Honor. I was looking
6 at something. Was that --

7 THE COURT: You also have in yours accomplice
8 testimony that I don't think we need.

9 MS. CONNORS: Yes. I agree, Your Honor.

10 THE COURT: Okay.

11 MS. CONNORS: And then I don't think there's an
12 instruction on a stipulation; is that right?

13 THE COURT: I don't think there is, either. If
14 you-all want to send me one, I'll include it. But I've made
15 it pretty clear to them already that those are agreed to. But
16 do you want me to put one of those in?

17 MS. CONNORS: No, Your Honor. I was just
18 double-checking that there wasn't a pattern. I don't think
19 that there is.

20 THE COURT: I don't think that there is.

21 MS. CONNORS: Okay.

22 THE COURT: There is -- I think there is in the
23 before trial section.

24 MS. CONNORS: Oh, yeah.

25 THE COURT: Because I already gave that to them.

1 MS. CONNORS: In the preliminary.

2 THE COURT: Okay. All right. Anything else?

3 Can you -- could one of you email this to my law
4 clerk or my courtroom deputy. This is the 404(b) instruction.

5 MS. CONNORS: Oh, okay.

6 THE COURT: So we can drop it into that. All right?
7 Okay. Anything else we need to talk about today?

8 MR. FINLAYSON: No, sir.

9 MS. CONNORS: I don't think so.

10 THE COURT: 8:30 tomorrow.

11 MS. CONNORS: Yes, Your Honor.

12 THE COURT: Okay. Thank you.

13

14 (Whereupon, the proceedings were adjourned at 5:09
15 p.m.)

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REPORTERS CERTIFICATE

I, Jana B. Colter, Official Court Reporter for the United States District Court for the Northern District of Georgia, with offices at Atlanta, do hereby certify:

That I reported on the Stenograph machine the proceedings held in open court on July 23, in the matter of *United States of America v. Carl Delano Torjagbo also known as Karl Lucius Delano*, case Number 1:22-CR-00171-MLB; that said proceedings in connection with the hearing were reduced to typewritten form by me; and that the foregoing transcript is a true and accurate record of the proceedings.

This the 10th day of November, 2025.

/s/ Jana B. Colter, FAPR, RDR, CRR, CRC
Official Court Reporter

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