

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-CR-60173-KMW

UNITED STATES OF AMERICA, Miami, Florida

Plaintiff, October 8, 2024

vs.

9:50 AM - 4:34 PM

CAROLYN DENISE WADE and DAY 2
TRACY D. WADE,

Defendants. Pages 1 to 244

TRANSCRIPT OF JURY TRIAL
HELD BEFORE THE HONORABLE DONALD L. GRAHAM
UNITED STATES DISTRICT JUDGE

FOR THE GOVERNMENT:

DAVID A. SNIDER, AUSA
ADAM LOVE, AUSA
United States Attorney's Office

ON BEHALF OF THE DEFENDANTS:

JOHNNY L MCCRAY, JR., ESQ.
Law Office of Johnny L. McCray, Jr, P.A.
and
DARYL E. WILCOX, ESQ.

ALSO PRESENT: Carolyn Wade
Tracy Wade
Hendrith V.A. Smith, paralegal

LANCE W. STEINBEISSER, FCRR, RPR, FPR-C
Official Court Reporter
United States District Court
400 North Miami Avenue
Miami, Florida 33128
305.523.5633

Proceedings recorded by mechanical stenography; transcript
produced by computer-aided transcription.

T A B L E O F C O N T E N T S

	<u>PAGE</u>
<u>GOVERNMENT'S WITNESSES:</u>	
ALTHEA HARRIS	
Direct Examination by Mr. Love.....	4
Cross-Examination by Mr. Wilcox.....	34
AMANDEEP THAKRAL	
Direct Examination by Mr. Snider.....	45
Cross-Examination by Mr. Wilcox.....	147
Redirect Examination by Mr. Snider.....	168
LINDSEY BERGH	
Direct Examination by Mr. Snider.....	173
Cross-Examination by Mr. Wilcox.....	200
DION MORROW	
Direct Examination by Mr. Snider.....	202

1 (Call to the Order of the Court.)

2 THE COURT: Good morning, ladies and gentlemen. We
3 are a little late because one of our jurors had a problem
4 arriving on time. Apparently, there was a lot of traffic on
5 Interstate 95. She advised that she was about ten minutes
6 away, but it took an hour to get here, which none of us can
7 challenge, actually. So let's bring the jury in and we will
8 get started.

9 Do you have your first witness?

10 MR. SNIDER: Yes, Your Honor.

11 THE COURT: If you can have them come in.

12 MR. SNIDER: It's Ms. Althea Harris from the Small
13 Business Administration.

14 THE COURT: All right.

15 (Jury entered at 9:52 AM.)

16 THE COURT: Good morning, ladies and gentlemen. I
17 understand that there were some unusual traffic problems, so
18 we are starting a little late, but we're ready to proceed at
19 this time.

20 Please call your first witness.

21 MR. LOVE: Good morning, Your Honor.

22 The United States calls Althea Harris.

23 THE COURT: Come forward, please.

24 (Government witness, ALTHEA HARRIS, duly sworn.)

25 THE COURTROOM DEPUTY: Please have a seat. State

HARRIS - DIRECT

4

1 your name and spell it for the record, please.

2 THE WITNESS: Althea Harris, A-L-T-H-E-A, Harris,
3 H-A-R-R-I-S.

4 MR. LOVE: Good morning, everyone.

5 DIRECT EXAMINATION

6 BY MR. LOVE:

7 Q. Good morning, Ms. Harris.

8 A. Good morning.

9 Q. Can you please tell the jury where you work?

10 A. I work for the US Small Business Administration in the
11 South Florida district office, here in Miami.

12 Q. And what do you do for the Small Business Administration?

13 A. I am the deputy district director and I lead a team of
14 people who implement the SBA's mission throughout the 24
15 counties south of Orlando.

16 Q. And the Small Business Administration is commonly referred
17 to as the SBA?

18 A. Yes.

19 Q. What does the SBA do?

20 A. The SBA is a federal agency, and our mission is to help
21 entrepreneurs and small businesses start, grow, and succeed in
22 business and recover after disasters. And we do that in four
23 primary ways. We provide access to high-quality and low-cost
24 advice, consulting, training. We help business owners who
25 want to sell their products or services to the federal

HARRIS - DIRECT

5

1 Government by giving them certifications and, again, advice.

2 We help them finance their businesses with loan guarantees
3 that we provide to banks, and we also provide direct financial
4 assistance in the case of declared disasters.

5 Q. So do small businesses rely upon the SBA?

6 A. Oh, yes.

7 Q. You mentioned financial assistance. Can you just describe
8 that generally, what the SBA does?

9 A. Sure. We provide a guarantee to lenders who are willing
10 to make loans to small businesses -- for them -- whatever
11 their financial need is in their business.

12 Q. Can you speak to the underwriting process?

13 A. The underwriting is done at the banks, and we rely on them
14 to make underwriting decisions. They know our rules. They
15 know our criteria, and so we trust them to make the decisions
16 in their relationship with business owners.

17 Q. Now I want to direct your attention to the COVID-19
18 pandemic.

19 A. Okay.

20 Q. Did the SBA provide assistance to small businesses during
21 that time?

22 A. Yes.

23 Q. And what did they provide?

24 A. We provided -- oops, sorry. We provided that same help
25 that I described in the financial way and as well in the

HARRIS - DIRECT

6

1 disaster recovery way. So SBA was charged with implementing
2 pandemic relief for small businesses.

3 Q. Was a new program created to assist the SBA in their
4 mission?

5 A. Not exactly. There was -- Congress passed a law that
6 funded the Paycheck Protection Program, and so we implemented
7 that.

8 Q. Is the Paycheck Protection Program commonly referred to as
9 the PPP?

10 A. Yes.

11 Q. And was that program created as the Coronavirus Aid,
12 Relief, and Economic Security Act?

13 A. Yes, that was part of the CARES Act.

14 Q. From the SBA viewpoint, was it important that a lending
15 program be created at that point in time?

16 A. Yes. The Congress, in passing the CARES Act, wanted that
17 money to get out to small business owners rapidly. So SBA was
18 chosen as the agency to do that because we have decades of
19 experience getting funding to business owners on our existing
20 framework to do that.

21 Q. Now, the Paycheck Protection Program, what was the primary
22 purpose?

23 A. The PPP was created to get moneys to business owners so
24 that they could pay their employees because, you all may
25 recall, the country was largely shut down because of the

HARRIS - DIRECT

7

1 pandemic and people were not able to go to work. So Congress
2 didn't want people, you know, without income. So PPP was
3 created, and we managed that program and got the moneys out so
4 that business owners could pay their employees.

5 Q. In your role at the SBA, are you familiar with how the PPP
6 was actually implemented?

7 A. Yes.

8 Q. Okay. And how about its operation?

9 A. Yes.

10 Q. Speaking towards the implementation, did small business
11 applicants work directly with the SBA to apply for a PPP loan?

12 A. No.

13 Q. Who did they work with?

14 A. They -- business owners would go to lenders of their
15 choice and make an application.

16 Q. And why was the PPP program structured in that fashion?

17 A. Well, it mimics our regular loan programs. Business
18 owners who want an SBA-guaranteed loan go to the lender of
19 their choice, who they want to do business with, who they may
20 already have a relationship with, and they go through that
21 process together, and then we do our part and the lenders do
22 their part.

23 Q. Of course. Did this help facilitate that the money get
24 out to the small businesses quicker?

25 A. I'm sorry. Did what?

HARRIS - DIRECT

8

1 Q. Did working with private lenders help money get to small
2 businesses quicker?

3 A. Yes.

4 Q. Why was that important?

5 A. Well, there are an estimated over 32 million small
6 businesses in America. So there was no way, other than our
7 existing framework, to get money out. There was no time to,
8 you know, sort of train any new people to this environment to
9 get that money out to business owners.

10 Q. Okay. Switching over to the operation aspect of it, did
11 the PPP maintain the same underwriting requirements as
12 traditional finance programs that the SBA had been offering?

13 A. Yes.

14 Q. But at the same time were the lending requirements
15 relaxed?

16 A. Not really. We still relied on lenders to take
17 applications, screen them, do their underwriting, and then
18 make a decision about whether or not they were going to fund
19 the loan.

20 Q. And did the lending requirements require any type of
21 certification?

22 A. Yes.

23 Q. Can you describe that, please.

24 A. In all cases, when you come to get an SBA-guaranteed loan
25 and in the case of PPP, you have to certify that you are

HARRIS - DIRECT

9

1 eligible for the loan, that you're going to use the proceeds
2 of the loan the way the program requires. And so in the case
3 of the Paycheck Protection Program, you had to certify that
4 you were going to spend a certain amount of that money on
5 payroll. You're certifying that you were in business before
6 the pandemic began.

7 So things like that -- and that you were going to be
8 truthful about the information you provided. All of those are
9 certifications important to SBA.

10 Q. If someone applied or a business applied for a loan, what,
11 if anything, actually needed to be provided for the
12 application?

13 A. So you give the information that the application is
14 requesting and then -- part of the application asks how much
15 you're requesting. That's based on your payroll. And then
16 you would provide -- the borrower would provide supporting
17 documents that show they had payroll at that level.

18 Q. What were some of the supporting documents that could be
19 used?

20 A. Business owners could use their bank statements that show
21 payroll going in and out -- or the moneys going in and out.
22 They could offer tax documents. They could -- if they used a
23 payroll service, like Paychex, they could get a statement from
24 their payroll provider to substantiate their payroll.

25 Q. Are you familiar with the term sole proprietor?

HARRIS - DIRECT

10

1 A. Yes.

2 Q. In what context are you familiar with that term?

3 A. That is a business formation type that tells whoever needs
4 to know what kind of business it is.

5 Q. How big is that business?

6 A. It's one person, one owner, one employee, and the owner is
7 the employee of that business.

8 Q. And were sole proprietors eligible to apply for PPP loans?

9 A. Yes.

10 Q. And were there any specific limits on the amount of that
11 loan that sole proprietors must have met?

12 A. Yes. In all cases, there was a limit on PPP. So
13 regardless of how much you actually earned, the most any one
14 employee could earn, for the purposes of the calculation, was
15 a hundred thousand dollars. So if you were -- if you made
16 \$200,000, it doesn't matter. The calculation will be based
17 off a maximum of \$100,000.

18 Q. You're using the term "calculation." What was the
19 calculation?

20 A. The calculation for PPP was your averaged annual
21 payroll -- so your -- so it's your payroll for one year,
22 divide by 12, multiplied by two and a half, so that way the
23 PPP could fund two and a half months of payroll for your
24 business.

25 Q. And if a sole proprietor only made a couple of hundred

HARRIS - DIRECT

11

1 dollars, are they still eligible?

2 A. Sure.

3 Q. In relation to a sole proprietorship, what supporting
4 document needed to be provided?

5 A. Well, they could provide any of the documents I mentioned
6 or they could -- as I mentioned, a tax document, a Schedule C
7 would show their activity in payroll.

8 Q. Was the PPP loan funding available in the spring of 2021?

9 A. Yes.

10 Q. And that includes May 2021?

11 A. Yes.

12 Q. You mentioned that applicants could work with local
13 private lenders.

14 A. Yes.

15 Q. Could they also go online?

16 A. Yes. As the pandemic wore on, SBA increased the number
17 and types of businesses that -- or excuse me -- lenders that
18 businesses could do -- request the loan from. We had, you
19 know, X number before the pandemic, and that number rose to
20 over 5400.

21 Q. These lenders, could they create their own way of
22 capturing the information that the SBA needed for the loan
23 program?

24 A. Yes.

25 Q. And that loan application, was that referred to as the SBA

HARRIS - DIRECT

12

1 Form 2483-C?

2 A. Yes.

3 Q. You mentioned that a business had to be existing before
4 the pandemic.

5 A. Yes.

6 Q. Was there a specific date in which they had to be a
7 business by?

8 A. They had to be in business before -- I believe it was
9 February 15th of 2020.

10 Q. And this application process, from the SBA's viewpoint,
11 was it designed to be difficult?

12 A. No, absolutely not.

13 Q. And why?

14 A. Because, again, it was important to Congress that that
15 money get out fast. That was part of the legislation and
16 their directive to our part of the Government -- to get the
17 money out, to get it out quickly -- so that business owners
18 could get those funds to pay their employees.

19 Q. Since it wasn't designed to be difficult, was the SBA
20 relying upon the businesses to certify their own information?

21 A. Yes.

22 Q. If an applicant uses an SBA-partnered lender, who actually
23 backed the loan?

24 A. SBA backed the loans.

25 Q. And what does that mean to back the loans?

1 A. That means when you get an SBA-guaranteed loan, if you
2 default on that loan as a borrower, the federal Government --
3 SBA will repay the lender your outstanding balance up to a
4 certain percentage.

5 Q. So at the outset of the application, this was an actual
6 loan?

7 A. Yes. It was designed to be a forgivable loan.

8 Q. What does it mean to be a forgivable loan?

9 A. Well, PPP is very unique in that it was a loan -- because
10 all other SBA loans are not forgivable. If you get it, you
11 have to pay it. But in the case of PPP, Congress made it a
12 forgivable loan so that once you got the funds, if you used it
13 appropriately, you could apply to have those -- that loan
14 forgiven and SBA would, you know, wipe your slate clean. You
15 didn't have to repay it.

16 Q. And was it important to the SBA that the information on
17 the Form 2483 was accurate?

18 A. Yes.

19 Q. And was it important to the SBA that the supporting
20 documents were accurate?

21 A. Yes.

22 Q. And was it important to the SBA that the forgiveness side
23 of the application was accurate?

24 A. Yes.

25 Q. And in your role at the SBA, you're familiar with the PPP

HARRIS - DIRECT

14

1 applications and supporting documentation?

2 A. Yes.

3 Q. And you're familiar with the forms?

4 A. Yes.

5 MR. LOVE: Your Honor, at this time, I would like to
6 publish several documents, which I'll identify for the Court.
7 They are Government exhibits, and I just don't know if the
8 jurors have their screens on. If I could ask for the Court's
9 assistance with that.

10 THE COURT: We will have the screens turned on.

11 Recall, ladies and gentlemen, from yesterday, I
12 indicated that I had received a number of exhibits. This
13 means that the Government doesn't have to go through the
14 process of laying the foundation, which takes a lot of time.

15 However, when a document is referenced, it's up to
16 the party, defense or Government, introducing it to make sure
17 the witness explains what it is. I have received a number of
18 exhibits -- I'm not sure of the precise number. Do you know
19 the number that I have received, approximately?

20 MR. LOVE: That I'm going to reference --

21 THE COURT: En masse, the ones I received yesterday,
22 about what? 200? 100?

23 MR. SNIDER: About a hundred.

24 THE COURT: A hundred documents. So assume when the
25 Government refers to an exhibit as Government Exhibit 1, it

HARRIS - DIRECT

15

1 has been received in evidence. If they say Government
2 Exhibit 2 for identification, it hasn't been received, they
3 would be laying a foundation, and then I would announce,
4 "Received as marked."

5 So I think all of the exhibits that are going to be
6 referenced with this witness have already been received in
7 evidence; is that correct?

8 MR. LOVE: Yes, sir.

9 THE COURT: All right. You may proceed.

10 BY MR. LOVE:

11 Q. Displaying Government Exhibit 117.

12 Ms. Harris, is the screen on in front of you?

13 A. Yes, sir.

14 Q. And I'll just give you a moment to orient yourself.

15 MR. WILCOX: Your Honor, defense -- our screen is not
16 on. I apologize.

17 THE COURT: Let's see if we can correct that problem.

18 BY MR. LOVE:

19 Q. Ms. Harris, what are we looking at?

20 A. This is SBA Form 2483-C, and it is the borrower's
21 application for the Paycheck Protection Program.

22 Q. Directing your attention to the top right, which I'm going
23 to enlarge for you, what type of business was applying, based
24 on this application?

25 A. The checked box is for sole proprietor.

HARRIS - DIRECT

16

1 Q. And what was the business name?

2 A. Carolyn Wade.

3 Q. And I want to show you the box that's listed DBA or trade
4 name. What's in that box?

5 A. Carolyn Wade.

6 Q. Year that it was established?

7 A. New Year's Day, 2011.

8 Q. That's the year the business was established; correct?

9 A. Yes.

10 Q. What's listed as the business address?

11 A. 6110 Reese Road, Apartment 207, Fort Lauderdale, Florida,
12 33314.

13 Q. And I've highlighted the right section at the top. What's
14 described and what's depicted here on the screen?

15 A. On the left is the business or employer identification
16 number or it could be the social, but it's basically a social
17 security number for the business or the person, the sole
18 proprietor. There's a business telephone number, a primary
19 contact of Carolyn Wade with an email address and --
20 indicating that the tax year that this information is going to
21 be based on is 2019, and there's one employer, who is also the
22 owner.

23 Q. I just want to clarify something. You said a social
24 security number for the business.

25 A. Mm-hmm.

HARRIS - DIRECT

17

1 Q. Is that a unique number?

2 A. Yes.

3 Q. Do any two businesses, in your understanding, have the
4 same TIN?

5 A. Right, no. Everybody gets one number.

6 Q. What was the total amount of gross income for this
7 business in 2019?

8 A. This says \$113,560.

9 Q. So you testified earlier about the maximum.

10 A. Yes.

11 Q. Is this over that maximum?

12 A. Yes. This is over \$100,000.

13 Q. And so you mentioned that their loan would be based off of
14 a capped number?

15 A. That's right, a capped number of \$100,000.

16 Q. Now, earlier you talked about a calculation.

17 A. Yes.

18 Q. Columns A and B, what's depicted here?

19 A. So box A is showing \$113,560 as the gross income for this
20 business. Then you divide that by 12 to get an
21 average monthly amount of \$8,333.33.

22 Q. I just want to be clear. That 8,333, is that based off of
23 the capped amount?

24 A. Yes, it's based off of \$100,000 -- thank you -- divided by
25 12.

HARRIS - DIRECT

18

1 Q. And then all the way to the right there's a number.

2 A. Mm-hmm.

3 Q. What is that number?

4 A. So that number is \$20,833, and it represents \$100,000
5 divided by 12, and that number multiplied by 2.5 to get the
6 maximum loan amount for a PPP loan to this business.

7 Q. So if a company had a gross income of 150,000 or 100,000,
8 the maximum loan amount was what?

9 A. Would be \$20,833.

10 Q. Dropping to the bottom, what was the purpose for the loan
11 according to this business application?

12 A. The box is checked for payroll costs.

13 Q. And I'm moving to page 3 of Government Exhibit 117, and
14 I'm directing your attention to the top, which is bolded,
15 underlined, and then the first two dots. If you could please
16 describe this section, page 3, and then read what has been
17 enlarged for you.

18 A. I'm sorry. Do you want me to read it or --

19 Q. We'll start with the first question.

20 A. Okay.

21 Q. Page 3. What's on page 3?

22 A. Okay. Thank you.

23 It is the certifications that the business owner is
24 making in -- as part of their application for this loan.

25 Q. You testified earlier about the reliance upon

1 certifications. Are these some of the certifications?

2 A. Yes.

3 Q. But the SBA, are they also relying on the information that
4 was depicted on page 1?

5 A. Oh, yes, absolutely.

6 Q. So it's not just any one of them. It's everything?

7 A. It's everything, right.

8 Q. Now I'm going to enlarge the bolded and underlined, as
9 well as the first two bullet points, please. If you could
10 read those.

11 A. Yes.

12 "I certify that I have read the statements included
13 in this form, including the statements required by law and
14 executive orders, and I understand them. The applicant is
15 eligible to receive a loan under the rules in effect at the
16 time this application is submitted that have been issued by
17 the Small Business Administration and the Department of the
18 Treasury implementing the Paycheck Protection Program under
19 Division A, Title 1, of the Coronavirus Aid, Relief, and
20 Economic Security Act, the Economic Aid to Hard-Hit Small
21 Businesses, Non-Profits, and Venues Act, and Title 5 of the
22 American Rescue Plan Act of 2021, the Paycheck Protection
23 Program rules."

24 Q. Now, directing your attention to the bottom portion, and
25 we're going to highlight the left-hand side where there

1 appears to be some writing.

2 What is that section? What's the purpose of that
3 section?

4 A. Those are the borrower's initials next to statements that
5 they're acknowledging and attesting to.

6 Q. So the SBA, when creating -- when this form was created,
7 the SBA would look to that section for the acknowledgement by
8 the borrower?

9 A. Yes.

10 Q. And what appears to be or what was purported to be listed
11 there for an acknowledgement? What letters?

12 A. Oh, CW.

13 Q. Directing your attention to the last certification. If
14 you could read that, please.

15 A. "I further certify that the information provided in this
16 application and the information provided in all supporting
17 documents and forms is true and accurate in all material
18 respects.

19 "I understand that knowingly making a false statement
20 to obtain a guaranteed loan from SBA is punishable under the
21 law, including under 18, USC, 1001 and 3571 by imprisonment of
22 not more than five years and/or a fine of up to \$250,000;
23 under 15, USC, 645 by imprisonment of not more than two years
24 and/or a fine of not more than \$5,000; and if submitted to a
25 federally insured institution, under 18, USC, 1014, by

HARRIS - DIRECT

21

1 imprisonment of not more than 30 years and/or a fine of not
2 more than \$1 million."

3 Q. Moving to page 4 of Government Exhibit 117, highlighting
4 the top portion. What is on page 4?

5 A. Oh, excuse me. It's an acknowledgement that the lender
6 will confirm the eligible loan amount using the required
7 documents submitted.

8 Q. And what is the printed name that's highlighted?

9 A. Carolyn Wade.

10 Q. And the date of the application?

11 A. May 28, 2021.

12 Q. And what is the title?

13 A. Owner.

14 Q. And how is this document signed -- appears to be signed?

15 A. With a CW.

16 Q. Moving to page 8 of Government Exhibit 117. What is
17 depicted on page 8?

18 A. This is showing who the applicant of the loan is, the
19 name, title, their ownership shares in the business, the
20 unique identifier for the business, and the address of the
21 business.

22 Q. And was this the information that the lenders that the SBA
23 worked with were required to collect during the application
24 process?

25 A. Yes.

HARRIS - DIRECT

22

1 Q. Moving to Government Exhibit 113. Do you recognize this
2 document?

3 A. That is a Schedule C for a business -- a tax return.

4 Q. And what is the -- I'm going to highlight this for you and
5 enlarge it. What is the name of the proprietor?

6 A. Carolyn Wade.

7 Q. Is this the document that sole proprietors could use as
8 supporting documentation?

9 A. Yes.

10 Q. And the principal business or professional that's listed?

11 A. Is listed as Carolyn Wade.

12 Q. And the business address?

13 A. 6110 Reese Road, Davie, Florida 33314.

14 Q. And I'm highlighting the social. What was the social?

15 A. The social security number here is 592-09-0026.

16 Q. And dropping down to part 1, line 7. What's listed here?

17 A. It says the gross income for this business was \$113,560.

18 Q. Is this where that number on the first page of Government
19 Exhibit 117 came from?

20 A. Yes.

21 Q. Now, did the information that supported the PPP
22 application need to be true?

23 A. Yes.

24 Q. If the SBA had known that it was false, would the SBA have
25 funded that loan?

HARRIS - DIRECT

23

1 A. No.

2 Q. And did the certifications that we looked at a moment ago
3 apply to the Schedule C?

4 A. Yes.

5 Q. Moving to Government Exhibit 118. What is this document?

6 A. This is SBA Form 3508-S, and it is an application for
7 forgiveness of a PPP loan.

8 Q. And is this application separate from the loan
9 application?

10 A. Yes.

11 Q. But it's still part of the same loan?

12 A. Yes.

13 Q. Just two different documents?

14 A. Yes.

15 Q. At the top, what business was applying for forgiveness?

16 A. Carolyn Wade.

17 Q. And the trade name?

18 A. Carolyn Wade.

19 Q. Address?

20 A. 6110 Reese Road, Apartment 207, Davie Florida 33314.

21 Q. And the primary contact?

22 A. Carolyn Wade.

23 Q. I want to direct your attention to the middle section
24 here. Can you describe in sum what is being certified in this
25 section?

1 A. Again, this is a certification required by SBA that the
2 borrower used the moneys the way they were supposed to,
3 according to the Paycheck Protection Program rules, and that
4 the information provided for this application is true and
5 correct in all material respects.

6 Q. What were some of the uses that the loan could be used?

7 A. The majority of the loan had to be used on payroll -- so
8 60 percent or more. 100 percent could be used on payroll, but
9 a minimum of 60 percent was required to be spent on payroll.
10 And then the business could use the other 40 percent to pay
11 their business rent or their mortgage insurance -- excuse
12 me -- their mortgage interest payments on their business,
13 their utilities for the business. So there were various other
14 uses.

15 Q. Could an applicant or a borrower have assistance in
16 completing these loans?

17 A. Sure.

18 Q. But if they did have assistance, who was required to sign
19 the loans?

20 A. The borrower.

21 Q. And any authorized representative of the company as well?

22 A. Yes.

23 Q. But if a friend was helping complete a form, could they
24 sign the form?

25 A. No. It was the borrower who signs the form.

HARRIS - DIRECT

25

1 Q. And this form here, who signed? Who appeared to sign?

2 A. It looks like Carolyn Wade.

3 Q. And the printed name?

4 A. Carolyn Wade.

5 Q. And the title of the person signing?

6 A. Sole proprietor.

7 Q. And the date?

8 A. August 7, 2021.

9 Q. I direct your attention -- I'm just going to highlight
10 where it says "DocuSign." Are you familiar with that?

11 A. Yes.

12 Q. Just in your familiarity involving the SBA, describe what
13 that is.

14 A. It's an electronic mechanism to obtain a signature on an
15 electronic document.

16 Q. And why was the SBA allowing individuals to e-sign --
17 electronically sign the documents?

18 A. Again, ease and speed were two very important aspects of
19 this entire program.

20 Q. At this point, is the borrower again certifying for a
21 second time that everything that was submitted for the SBA's
22 consideration was true and accurate?

23 A. Yes.

24 Q. Government Exhibit 119 is displayed. What is this
25 document?

HARRIS - DIRECT

26

1 A. This is the notice that SBA provided to businesses that
2 their Paycheck Protection Program loan was forgiven.

3 Q. And in this case, Government Exhibit 119, who was the
4 notice provided to?

5 A. Carolyn Wade, the borrower.

6 Q. And anyone else specifically?

7 A. The lender of record.

8 Q. And I see here there is an SBA loan number. What is that?

9 A. That is a unique number that SBA assigns so we can keep
10 track of all those loans and borrowers.

11 Q. And the loan approval date?

12 A. May 23, 2021.

13 Q. And disbursement amount?

14 A. It was \$20,833.

15 Q. So in effect, what is this notice telling the lender and
16 the borrower as it relates to the disbursement amount?

17 A. This is saying that a loan of \$20,833 was disbursed by the
18 lender to the borrower.

19 Q. Government Exhibit 159. Some familiarity here. What is
20 this form?

21 A. This is the borrower application for the PPP loan program.

22 Q. And what is the business that is applying?

23 A. Tracy Wade.

24 Q. And what type of business is the business Tracy Wade?

25 A. The box for sole proprietor is checked.

HARRIS - DIRECT

27

1 Q. And what is the doing business as and trade name?

2 A. Tracy Wade.

3 Q. And the year it was established?

4 A. New Year's day, 2019.

5 Q. Dropping down, what's the business address?

6 A. 315 West Pembroke Road, Hallandale, Florida 33009.

7 Q. The box that I'm highlighting to the right of the address,
8 is this the similar contact information for the business name?

9 A. Yes.

10 Q. And what tax year was used to support the request?

11 A. 2019 is checked.

12 Q. How many employees?

13 A. One, the owner.

14 Q. And what was the total amount of gross income?

15 A. \$112,430.

16 Q. Highlighting the middle portion again, if you could just
17 reiterate what is depicted here.

18 A. Box A says the gross amount of income for the business is
19 \$112,430. Taking column B, we'll divide the maximum amount of
20 \$100,000 from box A, divide by 12 to get the average monthly
21 amount of \$8,333.33, multiplied by 2.5 -- so a total maximum
22 loan amount of \$20,833 for this application.

23 Q. Was this application separate and distinct from the
24 application in Government Exhibit 117?

25 A. Yes.

1 Q. And what was the purported purpose of the loan?

2 A. The box for payroll costs is checked.

3 Q. Moving to page 3 of Government Exhibit 159. What is
4 page 3?

5 A. These are the certifications that the borrower makes about
6 their loan application.

7 Q. So in this situation, the certifications, are they the
8 same as what you described before?

9 A. Yes.

10 Q. And can you just summarize those certifications?

11 A. Sure. That the borrower has read and understands the
12 rules associated with making this application and that they
13 are saying they are, in fact, eligible to receive this loan
14 under the program rules in effect.

15 Q. And dropping down to the column that appears to actually
16 have handwriting on it, again, can you summarize what this
17 column was for?

18 A. These are the borrower's initials saying that they are
19 attesting to the items next to their initials.

20 Q. And just highlighting the bottom paragraph. Again, you
21 don't have to read it, but can you summarize this paragraph?

22 A. Right. This is saying that they're certifying, declaring
23 that the information they are providing with this application
24 is true and correct in all material respects.

25 Q. Is this the same certification that you previously read?

1 A. Yes.

2 Q. And moving to page 4 of Government Exhibit 159.

3 A. This is the signature page for the application, another
4 initial acknowledging that the lender will confirm their
5 eligibility for the loan amount they're requesting, using the
6 required documents that the borrower is providing to the
7 lender, and that they understand and acknowledge and agree
8 that the lender can share the tax information concerning this
9 application. And then there's a signature by Tracy Wade who
10 says she's [sic] the owner, and it's dated May 27, 2021.

11 Q. I'm going to page 8 -- page 8 of Government Exhibit 159.
12 Is this the information that the lender was required to gather
13 for the SBA?

14 A. Yes.

15 Q. Moving to Government Exhibit 154. What do we see here?

16 A. This is the tax filing of a Schedule C for the year 2019
17 for a business named Tracy Wade.

18 Q. And what is listed as the principal business or
19 profession?

20 A. Tracy Wade.

21 Q. And the social security number?

22 A. 261-67-4088.

23 Q. And dropping down to part one of it where it says part one
24 of the page, line 7. What's listed as the gross income?

25 A. \$112,430.

HARRIS - DIRECT

30

1 Q. Is this the same number that is then reflected on the SBA
2 form that we just reviewed?

3 A. Yes. It's the number on the PPP application.

4 Q. And did this information supporting the PPP application
5 have to be true?

6 A. Oh, yes.

7 Q. If the SBA had known that this information was false,
8 would the loan have been funded?

9 A. No.

10 Q. And did the certifications that we looked at a moment ago
11 cover this supporting document for that loan?

12 A. Yes.

13 Q. Government Exhibit 160, what is this document?

14 A. This is SBA Form 3508-S, and it is the PPP loan
15 forgiveness application.

16 Q. And for what business does this tie to?

17 A. Tracy Wade.

18 Q. And is the contact information and primary business
19 address the same as what was previously listed?

20 A. Yes.

21 Q. And as a reminder, I'm going to highlight the middle
22 portion of page 1 of Government Exhibit 160. Can you please
23 summarize this section?

24 A. Yes. It is the borrower saying that they complied with
25 all the rules about the Paycheck Protection Program with their

HARRIS - DIRECT

31

1 loan and that the information provided in this loan
2 forgiveness application is true and correct in all material
3 respects.

4 Q. And who appeared to have signed it here?

5 A. The printed name is Tracy Wade. I can't read that
6 signature, but it's listed as the owner and dated August 7,
7 2021.

8 MR. LOVE: Your Honor, just a moment.

9 THE COURT: Yes, sir.

10 BY MR. LOVE:

11 Q. The middle section that I've highlighted for you there, at
12 the top you see two boxes. One is checked. Can you describe
13 what information is there?

14 A. That is, the box is checked for First Draw PPP loan. That
15 means this is their first application for a PPP loan to be
16 funded. There is SBA's unique loan number assigned to this
17 loan, that the loan amount for the PPP was \$20,833, disbursed
18 on June 2, 2021.

19 Q. How many employees are listed on this loan application?

20 A. This loan forgiveness application indicates that there are
21 ten employees at the time of the application for the PPP loan,
22 and at the time of the forgiveness application, there are ten
23 employees.

24 Q. And the covered period?

25 A. Is June 2, 2021, through August 7, 2021.

HARRIS - DIRECT

32

1 Q. And what is indicated or how much is indicated of the loan
2 was spent on payroll cost?

3 A. It looks here like the total loan was used for payroll,
4 \$20,833.

5 Q. And I'm just going back to Government Exhibit 159. At the
6 time of application, how many employees did this business
7 state it had?

8 A. One, the owner.

9 Q. Moving to Government Exhibit 161. What is this document?

10 A. This is the notice from SBA that -- to a borrower and to a
11 lender that the PPP loan is forgiven.

12 Q. And who is the borrower that received this notice?

13 A. Tracy Wade.

14 Q. And the lender?

15 A. Harvest Small Business Finance LLC.

16 Q. And the loan number?

17 A. That is SBA's unique loan number, 6261949003, approved on
18 May 22, 2021, in the amount of \$20,833.

19 Q. I just want to go back to Government Exhibit 118, drawing
20 your attention to the middle. This is the loan application
21 for Carolyn Wade.

22 How many employees did this application state it had
23 at the time of the application?

24 A. Three.

25 Q. And how about at the time of the forgiveness application?

HARRIS - DIRECT

33

1 A. Three.

2 Q. And how much was spent on payroll cost?

3 A. It indicates here that all of the funds were spent on
4 payroll, \$20,833.

5 MR. LOVE: Just a moment, Your Honor.

6 BY MR. LOVE:

7 Q. And pulling up Government Exhibit 117, the application for
8 Carolyn Wade, how many employees did this business state it
9 had?

10 A. One, the owner.

11 Q. If the SBA had known an application contained false
12 information about the business income, would the SBA have
13 issued a loan number?

14 A. No.

15 Q. If the borrower had originally submitted false income
16 information to get a PPP loan, could the borrower have been
17 eligible to have a loan forgiven?

18 A. No.

19 Q. And would the SBA have forgiven the loan if it had known
20 that the borrower had submitted false information?

21 A. No.

22 MR. LOVE: No further questions on direct, Your
23 Honor.

24 MR. WILCOX: Your Honor --

25 THE COURT: Yes, sir.

1 MR. WILCOX: -- a quick bathroom break, please.

2 THE COURT: All right. We're going to take a short
3 break, ladies and gentlemen.

4 We're in recess.

5 (Jury exited at 10:39 AM.)

6 (Recess from 10:39 AM to 10:54 AM.)

7 (Jury entered at 10:54 AM.)

8 THE COURT: Please proceed.

9 CROSS-EXAMINATION

10 BY MR. WILCOX:

11 Q. Good morning, Ms. Harris.

12 A. Good morning.

13 Q. How are you?

14 A. I'm well, sir. Thank you.

15 Q. Good, good.

16 Have you testified in other PPP loan cases involving
17 fraudulent PPP loans?

18 A. Yes, sir.

19 Q. Okay. And would you say it was unusual for the borrowers
20 to hire someone to help them prepare their PPP loan
21 applications?

22 A. I don't know if I can say it was usual or unusual.

23 Q. I mean, you've heard of that happening before --

24 A. Oh, sure.

25 Q. -- would it be fair to say?

1 A. Sure.

2 Q. Now, with respect to the actual application, how the
3 information gets placed into the application -- and when I say
4 the information, I mean the business name, the address, the
5 total amount of gross income -- now, that's not necessarily
6 put directly into the application by the borrower; is that
7 right?

8 A. I don't know.

9 Q. Okay. The small business loans use banks or lenders to
10 fund the loans?

11 A. Yes.

12 Q. These banks or lenders have their own application process;
13 is that correct?

14 A. Sure.

15 Q. Okay.

16 A. Yes.

17 Q. And so what I'm saying is that the person that is
18 inputting the information inputs the information into a form
19 that the bank uses; is that right?

20 A. Yes.

21 Q. And then the bank transfers the information to the SBA
22 application that we were just --

23 A. Yes, that's my understanding.

24 Q. Okay. That's how that works?

25 A. Yes.

1 Q. Okay. So --

2 A. So the borrower puts the information into whatever the
3 bank platform is --

4 Q. Let me stop you for a minute.

5 A. Yes.

6 Q. Or a user can put the information into the platform that
7 the bank is using?

8 A. Yes.

9 Q. Someone other than the borrower?

10 A. Sure.

11 Q. Okay. And in that case, the borrower wouldn't necessarily
12 know what was being inputted into the application; is that
13 right?

14 MR. LOVE: Objection.

15 THE WITNESS: I don't know --

16 THE COURT: Overruled.

17 THE WITNESS: I'm sorry. Can you repeat the
18 question?

19 BY MR. WILCOX:

20 Q. I said if you had a user inputting information into
21 whatever form that the bank uses and then the bank inputs the
22 information into your form, the SBA form, the borrower
23 wouldn't necessarily know what was being inputted into the SBA
24 form; correct?

25 A. I suppose that's possible.

1 Q. Now, I'm showing you what's been marked as Government
2 Exhibit 59, as soon as I get the ELM0 on. I thought I had the
3 ELM0 on.

4 Now, this is the loan application for Tracy Wade.
5 You had no involvement in processing this application;
6 correct?

7 A. Correct.

8 Q. And you have had no direct contact with Tracy Wade or
9 Carolyn Wade?

10 A. Correct.

11 Q. You never spoke to any of them over the phone; is that
12 correct?

13 A. I don't think so.

14 Q. And you've never had any email communications with them?

15 A. Not that I'm aware of.

16 Q. And you've never had any text messages with Carolyn Wade
17 or Tracy Wade; correct?

18 A. Correct.

19 Q. Okay. Now, this particular form allows a sole
20 proprietorship to apply for a PPP loan; right?

21 A. Right.

22 Q. And when we say PPP loan, I mean Paycheck Protection
23 Program loan; correct?

24 A. Correct.

25 Q. Now, if I'm not mistaken, the most anybody could ever get

1 on a sole proprietorship loan was \$20,833; is that right?

2 A. Correct.

3 Q. That's right because the most you can -- I mean, because
4 the most you're going to fund in this column -- can you see?

5 A. Yes, sir.

6 Q. Can you see where I'm pointing?

7 A. Yes, sir.

8 Q. -- is a hundred thousand dollars; right?

9 A. Correct.

10 Q. And then when you multiply that -- when you divide that by
11 12, you get \$8,333.33; right?

12 A. Correct.

13 Q. And when you divide -- or multiply that times 2.5, you get
14 \$20,833?

15 A. Correct.

16 Q. Okay. So no matter what's in this block here for a sole
17 proprietorship, it could be \$300,000 in that block; right?

18 A. Yes.

19 Q. You're still going to get \$20,833; right?

20 A. 20,833, yes, sir.

21 Q. \$20,833; correct?

22 A. Yes.

23 Q. So if a person had -- now, the small business owners --
24 this was a person that actually had a business with employees.
25 This was the most money they could get; is that correct?

1 A. The most SBA would fund for one employee is \$20,833.

2 Q. What I'm asking you --

3 A. Okay.

4 Q. -- did they have other loan programs or could a person
5 receive a PPP paycheck program [sic] loan -- let me just back
6 up.

7 An individual had a business, and let's say the
8 individual had five employees. They wouldn't be limited to
9 this \$20,833. They would just have to fill out another form;
10 is that right?

11 A. You mean under a sole proprietorship?

12 Q. No, not under a sole proprietorship. I mean, you could
13 get a PPP loan without being a sole proprietor; right?

14 A. Right.

15 Q. So there was another form or another PPP application that
16 would allow somebody who made more money and had employees to
17 get more than this \$20,833?

18 A. If they had another business, yes.

19 Q. No.

20 A. No. So then no.

21 Q. You're saying that no matter how much someone made and how
22 many employees they had, the most they can get on their PPP
23 loan is \$20,833?

24 A. I think I need you to ask again or differently because I'm
25 not following.

1 Q. Okay. Was a sole proprietorship the only Paycheck
2 Protection Program loan a person could get?

3 A. No.

4 Q. Okay. So there were other Paycheck Protection Program
5 loans available to people who were not sole proprietors; is
6 that correct?

7 A. Correct.

8 Q. Okay. It wouldn't be this form. If they wanted to get
9 more than \$20,000, they would have to fill out another form;
10 is that right?

11 A. Could you define "they"? Like, who do you mean?

12 Q. I'm sorry.

13 A. Sorry.

14 Q. If an individual that made more than \$100,000, had
15 employees, and wanted to get more than \$20,833, he would have
16 to fill out another form. There's another application he
17 would have to fill out?

18 A. I think the answer to your question is no, as I understand
19 your question. What I mean is if a business has multiple
20 employees, the limit is not \$20,833. It is the maximum loan
21 amount for -- the maximum amount a business could get for each
22 employee is \$20,833.

23 Q. I see.

24 A. So if a business had five employees who made a hundred
25 thousand or more, the dollar amounts would be different in

1 these boxes.

2 Q. And that person would not use sole proprietorship;
3 correct?

4 A. Under my example, no, they would not --

5 Q. They would have to use one of these other labels?

6 A. Correct.

7 Q. They would have to use one of these?

8 A. Correct.

9 Q. With the Paycheck Protection Program application, we
10 talked about the bank having their own form; correct? -- their
11 own?

12 A. Method for collecting --

13 Q. -- obtaining the information that goes into the form?

14 A. Yes.

15 Q. Even though we see that Tracy Wade's name is here, there
16 could have been someone else actually inputting the
17 information into the bank's system; correct?

18 A. Do you mean from the end user part?

19 Q. Yes, right.

20 The user and the borrower don't have to be the same.

21 A. Correct.

22 Q. The person that's using the bank's portal to fill in this
23 information doesn't necessarily have to be the borrower?

24 A. Correct.

25 Q. Okay. So you don't know who had inputted this \$112,430;

1 right?

2 A. Correct.

3 Q. You don't know who put Tracy Wade here as the business
4 legal name; is that right?

5 A. Correct.

6 Q. You don't know who put the business TIN here, do you?

7 A. No, sir.

8 Q. Or the person that put the phone number here?

9 A. No, sir.

10 Q. And that's the first page?

11 A. Yes.

12 Q. All the signatures on this next page of the application?

13 A. Yes.

14 Q. There's no signatures on the first page?

15 A. Correct.

16 Q. Is there a place for someone to sign next to the amount of
17 gross income?

18 A. No.

19 Q. Okay. There's no place for the person to sign there?

20 A. No.

21 Q. This is the third -- page 3?

22 A. Yes.

23 Q. There's no reference to gross income or any other
24 information on the first page or on that page; is that right?

25 A. Just that the funds will be used to retain workers. So

1 that's a reference to the funds.

2 Q. All right. But there's no indication on this page where
3 the initials are -- there's no indication what the gross
4 income was or the name of the company or anything like that;
5 right?

6 A. Right, no, no.

7 Q. And that would be the same for Carolyn Wade's application
8 as well; right?

9 A. Yes. The applications are identical -- or rather the form
10 is the same.

11 Q. Are you familiar with a Fast Lane application?

12 A. No.

13 Q. You're not familiar with that?

14 A. Not that term, no.

15 Q. Are you familiar with any of the applications that were
16 used by the banks that actually inputted the information into
17 your form?

18 A. Do you mean -- no.

19 Q. You're not familiar with any of those --

20 A. No, I have never made an application for a PPP loan, so --
21 we did not use those systems.

22 Q. So when the DocuSign prompts someone to sign, you don't
23 know what's actually on the screen. Would that be fair to
24 say?

25 A. With respect to SBA? This loan?

1 Q. Excuse me?

2 A. Could you ask your question again?

3 Q. So when the DocuSign prompts a borrower or a user to sign,
4 you don't know what's actually on the screen?

5 A. No.

6 Q. So what I'm trying to say is someone may have been
7 prompted to sign this -- sign here by the DocuSign --
8 right? -- and the front of the application was not visible to
9 the person that's initialling here?

10 A. I don't know.

11 Q. You don't know?

12 A. No.

13 Q. You can't say that the person who initialed this
14 actually -- that this part of the application is actually
15 visible on the screen when the person who made these initials
16 made them?

17 A. I don't know.

18 MR. WILCOX: One moment, Your Honor.

19 Briefly, Your Honor, I don't think I have anything
20 else. I just want to check my notes.

21 I don't have anything else, Your Honor.

22 THE COURT: All right.

23 MR. LOVE: No redirect, Your Honor.

24 THE COURT: May the witness be permanently excused?

25 MR. LOVE: Yes, Your Honor.

THAKRAL - DIRECT

45

1 THE COURT: Defense? Defense?

2 MR. WILCOX: Excuse me?

3 THE COURT: May the witness be permanently excused?

4 MR. WILCOX: Yes, Your Honor. I apologize.

5 THE COURT: All right. You are excused.

6 MR. SNIDER: Your Honor, the Government's next
7 witness is Amandeep Thakral.

8 (Government witness, AMANDEEP THAKRAL, duly sworn.)

9 THE COURTROOM DEPUTY: Please have a seat. Please
10 state your name and spell it for the record.

11 THE WITNESS: My name is Amandeep Thakral. It's
12 spelled A-M-A-N-D-E-E-P, last name, T-H-A-K-R-A-L.

13 DIRECT EXAMINATION

14 BY MR. SNIDER:

15 Q. Good morning, Mr. Thakral.

16 A. Good morning.

17 Q. How are you doing this morning?

18 A. I'm fine.

19 Q. Can you tell the jury, what are you currently doing for
20 work?

21 A. Currently, I'm a software consultant.

22 Q. Okay. And who are you a software consultant for? What
23 types of companies?

24 A. Tech companies primarily. Startups.

25 Q. Where do you live?

1 A. San Francisco Bay area.

2 Q. Have you ever done consulting for a company called Womply?

3 A. Yes.

4 Q. Have you ever worked as an employee of Womply?

5 A. Yes.

6 Q. Can you introduce the jury to Womply and tell them what
7 kind of company it is?

8 A. Sure.

9 Womply is a software tech company. They've been in
10 the business in the past around producing software for small
11 businesses, and then, most recently, they were a part of the
12 PPP program to help -- to help sole proprietors get access to
13 PPP loans.

14 Q. And when did you work for Womply?

15 A. So I worked for Womply from September of 2020 through --
16 to March of 2022.

17 Q. And did you have a title there?

18 A. Yes. My title was vice president of financial products.

19 Q. What did you do as the vice president of financial
20 products at Womply?

21 A. So my job was to help Womply build out its various
22 financial product offerings for its customers.

23 Q. Okay. And was that your most recent title that you had
24 while you were there?

25 A. Yes.

1 Q. And in your role in that, were you familiar with the
2 Paycheck Protection Program?

3 A. Yes.

4 Q. Did you have a role in developing Womply's software for
5 the Paycheck Protection Program?

6 A. Yes.

7 Q. What was that role?

8 A. I was the primary author.

9 Q. I'm sorry?

10 A. I was the primary author.

11 Q. The author of what?

12 A. Of the software that they used.

13 Q. Okay. Tell the jury about your educational background.

14 A. So I've got a bachelor's in engineering as well as a
15 master's in engineering.

16 Q. And what kind of engineering is that?

17 A. It's chemical engineering and bioengineering for my
18 undergrad, and then my master's is in system design.

19 Q. So it's fair to say that you're pretty familiar with
20 computers and coding and things of that technical nature?

21 A. Yes.

22 Q. Now, did Womply exist before the Paycheck Protection
23 Program?

24 A. Yes.

25 Q. And when the Paycheck Protection Program was created, did

1 Womply design software specifically for the PPP?

2 A. Sorry. Can you please state the question again?

3 Q. Sure.

4 When the PPP came about, did Womply design software
5 specifically for that program?

6 A. Yes.

7 Q. Were you involved in that design?

8 A. Yes.

9 Q. Are you familiar with the process that Womply had in place
10 for individuals, small business owners, to apply for PPP
11 loans?

12 A. Yes.

13 Q. And how was that process available to prospective
14 borrowers?

15 A. So everything was based online, and people would apply by
16 going to a website that Womply hosted.

17 Q. And do you remember that website address?

18 A. Yes. The domain was pppfastlane.womply.com. And that's
19 spelled P-P-P-F-A-S-T-L-A-N-E -- .womply.com.

20 Q. Were you involved in any way in the sort of design of
21 either the website itself or the coding that underwrote the
22 website?

23 A. Not for the website itself but for the underlying backend
24 systems and databases that powered the website.

25 Q. And do you have an understanding of sort of what the

THAKRAL - DIRECT

49

1 design intent was as far as usability for prospective
2 borrowers?

3 A. Yes.

4 Q. And what is that understanding?

5 A. That Womply tried to really streamline the application
6 process to make it easy for applicants to get PPP loans.

7 Q. Are you familiar with the PPP or Paycheck Protection
8 Program itself?

9 A. Yes.

10 Q. And are you familiar with the application process
11 generally for a PPP loan?

12 A. Yes.

13 Q. And are you familiar with the process that was in place at
14 Womply to apply for a PPP loan?

15 A. Yes.

16 Q. Are you familiar with the type of information that Womply
17 collected in connection with the PPP loan application process?

18 A. Yes.

19 Q. Did Womply collect information?

20 A. Yes.

21 Q. Did they collect documents?

22 A. Yes.

23 Q. And the information and documents that Womply collected,
24 that was through its website?

25 A. Yes.

1 Q. Did Womply store the information that was collected
2 through its website?

3 A. Yes, it was stored in databases as well as within our
4 cloud provider.

5 Q. Are you familiar with those databases?

6 A. Yes.

7 Q. Are you familiar with the records that are stored in those
8 databases?

9 A. Yes.

10 Q. And either through your employment at Womply or your
11 consulting for Womply, did you have opportunities to review
12 the data that was in those databases?

13 A. Yes.

14 Q. Now, in addition to the information itself that was
15 inputted and any documents that were sent to the website,
16 which you just testified Womply kept, did Womply also keep
17 track of activity on its website?

18 A. Yes.

19 Q. Did Womply keep track of logins to its website?

20 A. Yes.

21 Q. And when I say keep track, I'm asking was there particular
22 information that Womply captured during a user's login to its
23 website?

24 A. Yes.

25 Q. What kind of information did Womply capture?

1 A. So Womply captured the identifier that was used for
2 logging in, which was either a phone number or an email
3 address. It also captured information about the type of
4 device that was used as well as the time.

5 Q. You said as well as the time?

6 A. Yeah.

7 Q. What do you mean by that?

8 A. So whenever someone attempted to login, we would capture
9 the time in which that occurred.

10 Q. Have you ever heard of a term called an IP address?

11 A. Yes.

12 Q. Are you familiar with that?

13 A. Yes.

14 Q. What is it, just basically for the jury's information?

15 A. So an IP address is a way to identify a device on a
16 network.

17 Q. Okay. A device on a network. Does it identify by a
18 number where that -- or does it identify a device assigned to
19 a particular number?

20 A. It just identifies a device on a network. For example, it
21 could be a local network or it could be on the public
22 Internet, and it's a way to identify whether -- just how to
23 sign in to the ultimate router or ISP that's using that -- or
24 that's allowing that device to be used on that network.

25 Q. What's an ISP?

1 A. So an ISP is an Internet service provider.

2 Q. Okay. So Womply captured the address that was used or the
3 IP address that was used to access its website?

4 A. Correct.

5 Q. Did Womply capture the time of certain transactions that
6 were done on its website for a particular PPP application?

7 A. Yes.

8 Q. Did it capture the IP address that was being used to make
9 changes in a PPP application?

10 A. Yes.

11 Q. And was that information stored by Womply in its
12 databases?

13 A. Yes.

14 Q. The same thing with respect to documents that were
15 uploaded, did Womply capture the time of uploads?

16 A. Yes.

17 Q. Did it capture the IP address that was being used to
18 upload those documents to its website?

19 A. Yes.

20 Q. And when I say website, I mean a PPP application hosted on
21 Womply's website.

22 A. Yes.

23 Q. Do you know what an audit log is?

24 A. Yes.

25 Q. What's an audit log?

1 A. It is a way to track changes of an individual record
2 within a database.

3 Q. Okay. And is that what we've been talking about?

4 A. I think so, based on this conversation.

5 Q. An audit log is what?

6 A. So an audit log is a way to track changes on an individual
7 record within a database.

8 Q. So it sounds like Womply had that?

9 A. Yes.

10 Q. Now, I want to walk through what the experience or process
11 was like to apply for a PPP loan application on Womply's
12 website. Okay?

13 A. Okay.

14 Q. What would be the first step? How would someone go about
15 starting that process?

16 A. So the first step would be someone has to get to the
17 website domain, and that was either done via some marketing
18 material or an ad of some sort or some sort of a referral from
19 somebody else.

20 Q. Okay. So someone had to know to go to Womply?

21 A. Yeah.

22 Q. And once they learned that, then what would they do?

23 A. They have to create an account, and that was done by
24 providing both an email address and phone number.

25 Q. Could you create an account on Womply's portal without an

1 email address and phone number?

2 A. No.

3 Q. Did it have to be a real email address and phone number?

4 A. Yes. We verified the information by sending a one-time
5 code that was short-lived to both the email address and the
6 phone number.

7 Q. What do you mean by short-lived?

8 A. Typically, the code was only valid for under fifteen
9 minutes or so.

10 Q. So, just step-by-step, to verify the email address for an
11 applicant, you did what?

12 A. We would send the applicant an email with a code, and then
13 they would receive that email and then enter that code into
14 the website. And if it was within 15 minutes and also matched
15 the code within our systems, then we would say that that email
16 has been verified.

17 Q. And you had to verify the phone number as well?

18 A. Correct, in a similar manner.

19 Q. In a similar manner.

20 So to verify the cell phone, where would the message
21 get sent?

22 A. Via SMS or text message.

23 Q. Text message.

24 So once an applicant had verified their email address
25 and phone number, what was the next step?

1 A. Then they could -- from there, they could go in and create
2 a new application.

3 Q. Okay. And if you create a new application, what kind of
4 information did you have to start putting in?

5 A. You would have to provide some personal information, like
6 who you are, what your date of birth is, your social security
7 number. You would also have to provide some information about
8 your business. You would have to upload documents, such as
9 your -- such as your 2019 or 2020 Schedule C or F tax form.
10 You would have to also connect a bank account to receive the
11 funds. And so that's like -- oh, you would also have to go
12 through some form of identity verification.

13 Q. Is that a fair summary of the steps?

14 A. Those are all the major pieces, yes.

15 Q. Major pieces, okay. So let's break those down.

16 How is it that bank statements were uploaded?

17 A. The user would presumably download them from their
18 financial institution and then upload them into Womply's
19 website, and then we would store that information within our
20 cloud provider.

21 Q. So Womply kept a copy of what was uploaded?

22 A. Yes.

23 Q. And was that one of the requirements for the application,
24 to provide a bank statement?

25 A. A bank statement, I believe, was not required because you

1 could also link your bank account using a service called
2 Plaid, but the tax document upload was required.

3 Q. So then with respect to the bank either document or bank
4 information, what was the purpose of that?

5 A. It was -- it was to identify ultimately where to send the
6 funds.

7 Q. So was that why you needed a bank statement so if it was
8 approved the lender could know where to send the money?

9 A. Correct. Yeah.

10 Q. And you mentioned a Schedule C. Did I hear that?

11 A. Yes. Correct.

12 Q. What is a Schedule C?

13 A. So a Schedule C is a component of an individual or a
14 couple's tax return that specifies income earned as a sole
15 proprietor.

16 Q. And that was one of the documents that was required for a
17 PPP loan application through Womply's website?

18 A. Yes.

19 Q. Was Womply providing the service of applying for PPP loans
20 to a particular type of business owner?

21 A. Yes. We were focusing on sole proprietors.

22 Q. Mr. Thakral, have you ever heard of an SBA Form 2483-C?

23 A. Yes.

24 Q. And, to your knowledge, what is that?

25 A. That is the form that has to be filled out in order to

1 file a PPP application with the SBA.

2 Q. Did Womply have a role in the preparation of information
3 that was on an SBA Form 2483-C?

4 A. Yes, we would collect the data that was required to fill
5 out that form.

6 Q. So the data gets inputted into the website?

7 A. Yes.

8 Q. And then data that's inputted into the website gets put
9 onto this form --

10 A. Correct.

11 Q. -- is that correct?

12 A. Yes.

13 Q. Is there a part of the form, to your knowledge, that
14 includes a section regarding gross income?

15 A. Yes. If I recall, yes.

16 Q. Okay. And do you know where that information would come
17 from?

18 A. It would come from two sources. The user would enter it
19 into the website, and then it would also be part of their tax
20 document that they uploaded.

21 Q. The information that was being put into Womply's website
22 for a PPP application, did that have to all go in at once?

23 A. No, you could do it gradually over time. The application
24 process was designed to be flexible in case the user didn't
25 have all of the information available at once. And so they

1 could -- they could gradually fill out the application, and
2 then when they felt that they were ready to submit -- that all
3 the pieces were there -- they could submit the application.

4 Q. So, in other words, you could start and stop?

5 A. Yes.

6 Q. And you could log back out and log back in?

7 A. Yes.

8 Q. And when you logged back in, did you have to put all the
9 information in again?

10 A. No, it was persisted.

11 Q. Persisted. What's another word for that?

12 A. It was saved in our databases.

13 Q. So if the application was started and the person who was
14 filling it out needed to take a break, come back, would they
15 see the information that had been previously entered?

16 A. Yes.

17 Q. All the information --

18 A. If I recall --

19 Q. -- that was previously entered?

20 A. If I recall so, yes. The only thing that I can't recall
21 is if they were able to download the documents that they had
22 uploaded. I do recall that they were able to see -- see the
23 file name and time that they uploaded the documents.

24 Q. Okay. Now, are you familiar with the SBA Form 2483-C
25 having a certification and signature component to it?

1 A. Yes.

2 Q. Do you have an understanding of whether or not the
3 information that had been provided to Womply had to be
4 truthful?

5 A. It did.

6 Q. How about the documents that were uploaded in support of
7 an application? Did Womply require those to be truthful?

8 A. Yes.

9 Q. And did the certification process, to your knowledge,
10 capture a representation about the truthfulness of those
11 documents and information?

12 A. If I recall, there were statements to that effect, yes.

13 Q. Is those certifications something that Womply did for the
14 person or the person applying had to certify themselves?

15 A. The person applying had to certify themselves as part of
16 the signing process.

17 Q. Was there a particular signing process that Womply used or
18 employed for the PPP program?

19 A. Yes. We used digital signatures via a service known as
20 DocuSign.

21 Q. And that was for all PPP loan applications --

22 A. Yes.

23 Q. -- through Womply? I'll talk more about that in a second.

24 Once a PPP loan application was approved, what would
25 happen next as far as lenders?

1 A. Approved by whom?

2 Q. Approved by Womply.

3 A. Approved by Womply.

4 Q. What did Womply then do?

5 A. Okay. Womply would then try to pair that application with
6 a particular lender. Womply had several lenders. And
7 depending on the time of the program and the requirements of
8 the lenders and the amount of funding available for that
9 lender on that particular day, we would have to try and match
10 up that application with a particular lender.

11 Q. So Womply wasn't a lender?

12 A. Correct.

13 Q. Womply worked with lenders?

14 A. Correct.

15 Q. And was there ever a time where Womply had to route these
16 applications to more than one lender?

17 A. Yes.

18 Q. Why would that have been?

19 A. As I described before, there was -- one of the most common
20 circumstances was that a lender just didn't have any money
21 available on that particular day or week for routing, in which
22 case, if they were at capacity, we would have to find a
23 different lender. By the way, that's one example. There are
24 other reasons why.

25 Q. The DocuSigning of the Form 2483-C with the

1 certifications, did that happen before the application was
2 routed to a lender to see if the lender could --

3 A. No, that was part of the lender.

4 Q. I'm sorry?

5 A. That was associated with the lender.

6 Q. Associated with the lender?

7 A. Yeah, the signing process.

8 Q. That was for -- okay. Let me ask it this way.

9 When an SBA Form 2483-C was sent to more than one
10 lender, did that document have to be signed more than once?

11 A. Yes, it would have to be signed for each lender that they
12 were paired with.

13 Q. So if the first lender said, "Sorry, I can't -- I don't
14 have the money to do this," and Womply was then searching for
15 a second lender, that DocuSign had to be --

16 A. Sent again to the user.

17 Q. And signed again?

18 A. Yeah.

19 Q. And certified again?

20 A. Yes.

21 Q. And were there instances when that happened, to your
22 knowledge?

23 A. Yes.

24 Q. Now, Mr. Thakral, are you familiar with DocuSign?

25 A. Yes.

1 Q. Have you used it yourself?

2 A. Yes, I've used it both on a personal basis as well as on a
3 professional basis.

4 Q. And with respect to the professional basis, were you
5 familiar with it when you were working at Womply?

6 A. Yes. It was part of -- it was part of the testing process
7 for our software.

8 Q. Okay. So part of the testing process you said?

9 A. Yes.

10 Q. So did Womply actually test the signing environment and
11 process?

12 A. Yes.

13 Q. Why did it do that?

14 A. Just to make sure that we have good quality software being
15 released and that everything is well-tested and so that the
16 users don't encounter any bugs.

17 Q. So Womply, they mimicked what it would be like for the
18 user to sign it?

19 A. Correct.

20 Q. And do you know or do you recall what a user would have
21 seen when they were signing an SBA Form 2483 that they applied
22 for through Womply?

23 A. Yes.

24 Q. What would they have seen?

25 A. So the general process for DocuSign would be -- they would

1 receive an email that they used to sign up with Womply with a
2 link to the DocuSign portal. They would then be directed from
3 their email to the DocuSign portal. When the DocuSign portal
4 came up, they would click continue and they would review a
5 copy of the form in question. And then they would have to
6 either initial or sign various portions of that document. And
7 that was done either by adopting a signature via the keyboard
8 or they can draw one in by hand from their mobile device or
9 their laptop or whatever they were using.

10 Q. So based on your experience using DocuSign and your
11 experience in testing the signature process at Womply --

12 A. Yes.

13 Q. -- was the document, in this case a 2483-C form, visible
14 at the time the person was signing it?

15 A. Yes, of course.

16 Q. That's all pages?

17 A. Yes.

18 Q. And you said that in order to begin that signing process,
19 it was initiated through an email?

20 A. Yes.

21 Q. And the email was sent to whom?

22 A. To the email that they used to fill out the application --
23 to the applicant.

24 Q. To the applicant?

25 A. Yeah.

THAKRAL - DIRECT

64

1 Q. So whatever email address was on the application, that's
2 where the DocuSign email was sent for the person to begin
3 signing the document?

4 A. Yes.

5 Q. And it began by clicking the link?

6 A. Yes.

7 Q. So there was no separate login to sign DocuSign, was
8 there?

9 A. No. The signing process was through email.

10 Q. Through email?

11 A. Yeah.

12 Q. Not on Womply's website?

13 A. Correct.

14 Q. Okay. Mr. Thakral, at this point we're going to look at
15 some documents.

16 A. Okay.

17 MR. SNIDER: No, I'm sorry. We're going to use the
18 HDMI. Thank you.

19 BY MR. SNIDER:

20 Q. Mr. Thakral and for the Court, I'm publishing Government
21 Exhibit 149 in evidence.

22 Okay. Mr. Thakral, do you see Government Exhibit 149
23 on your screen?

24 A. Yes.

25 Q. And do you recognize this record?

1 A. Yes.

2 Q. What is it? And I can make it a little bigger for you.

3 A. No, that's fine.

4 So this looks like -- it is a list of search results
5 based off of a specific application ID, and then that
6 application ID was associated with someone named Tracy Wade
7 and that it also shows a summary of the various information on
8 that application.

9 Q. Okay. So let's walk through. Is this a record that
10 Womply kept?

11 A. Yes.

12 Q. And you said that this was for an applicant named Tracy
13 Wade?

14 A. Yes.

15 Q. Where are you getting that information from?

16 A. It's based off of the first name and last name columns in
17 the table.

18 Q. Do you see where it says "email address"?

19 A. Yes.

20 Q. Where is that information coming from?

21 A. This is coming from the applicant.

22 Q. And just so we have it in the record, what's the email
23 address that was used?

24 A. Tracyw764@gmail.com.

25 Q. And is that -- we're looking at what appears to be three

THAKRAL - DIRECT

66

1 rows. Do you see that?

2 A. Yes. Three records.

3 Q. Three records.

4 And the email address that you just read is the same
5 for all three?

6 A. Correct.

7 Q. The next column says phone. Do you see that?

8 A. Yes.

9 Q. Just read the phone number for the record, please.

10 A. (786) 488-1512.

11 Q. Is that the phone number associated with this application?

12 A. Yes.

13 Q. Is that the phone number that any codes that were one-time
14 codes to log in would have been sent to if logging in with a
15 phone number?

16 A. Yes.

17 Q. And back to the email address, is that the email address
18 that would have received a one-time code, that short-lived
19 code, if the user was using the email address to log in?

20 A. Yes.

21 Q. The next column says SSN. Do you see that?

22 A. Yes.

23 Q. Do you know what is in that column?

24 A. That is the user's social security number.

25 Q. Can you read the first one for the record?

THAKRAL - DIRECT

67

1 A. 261-67-4088.

2 Q. Okay. And, again, there's three rows here. Is the social
3 security number the same on all three?

4 A. Yes.

5 Q. And is that also user-supplied information --

6 A. Yes.

7 Q. -- inputted into the website?

8 The next column says DOB. Do you know what that is?

9 A. Date of birth.

10 Q. Just read it for the record.

11 A. January 2nd, 1973.

12 Q. Is it the same for all three rows?

13 A. Yes.

14 Q. And that's also user inputted?

15 A. Yes.

16 Q. Now, do you see where it says "application ID"?

17 A. Yep.

18 Q. Is that a unique number?

19 A. Yes, it is a unique identifier of an application within
20 our system.

21 Q. And I'm not going to have you read the whole thing. What
22 are the last four characters?

23 A. CB8B.

24 Q. Is that the same for all three?

25 A. Yes.

1 Q. What does that tell you as far as how many applications
2 we're looking at here?

3 A. So there was only one application.

4 Q. So one application but there's three rows here; right?

5 A. Yes.

6 Q. Now I'm blowing up the section that says deal ID. Do you
7 know what that is?

8 A. Yes.

9 Q. And this appears to have three different numbers; correct?

10 A. Yes.

11 Q. Tell the jury what that means.

12 A. So the deal ID represents the identifier of a particular
13 application being associated with a lender. And so for every
14 lender that that application is associated with, they would
15 have a different deal ID.

16 Q. Okay. So in this case it was three deals?

17 A. Yes.

18 Q. And three deals but one loan?

19 A. Correct.

20 Q. And is that consistent with what you testified a few
21 minutes ago about having to put or to route an application to
22 multiple different lenders?

23 A. Correct.

24 Q. So this is one of those examples?

25 A. Correct.

THAKRAL - DIRECT

69

1 Q. And can you tell from this which is the lender that,
2 according to your record, was the one that funded?

3 A. So the name of the lender that funded was Lendistry, and
4 that's because that is the only record with an SBA loan number
5 associated with it.

6 Q. The loan we're looking at here, is this one of the
7 examples where an SBA loan Form 2438 would have had to have
8 been signed multiple times because it was routed to multiple
9 lenders?

10 A. Yes.

11 Q. How many times, looking at this, would an SBA Form 2483
12 had to have been signed for this one application?

13 A. Three times.

14 Q. I'm publishing for you Government Exhibit 150 in evidence.
15 Do you see 150 on your screen --

16 A. Yes.

17 Q. -- Mr. Thakral?

18 A. Yes.

19 Q. Do you recognize it?

20 A. Yes.

21 Q. What kind of record is this?

22 A. This provides specific details about the application, and
23 it seems to be a summary of what is contained within the
24 application record.

25 Q. Okay. And this is information that Womply kept --

THAKRAL - DIRECT

70

1 A. Yes. This is a subset of information that Womply kept
2 about an application.

3 Q. Okay. And who does it appear to you that this application
4 is for?

5 A. Tracy Wade.

6 Q. And is that the application that we were just looking
7 at -- or the information about the application that we were
8 just looking at in Government Exhibit 149?

9 A. Yes.

10 Q. Does this record appear to contain metadata or technical
11 information about the history of the application through
12 Womply's systems?

13 A. Yes.

14 Q. I'm publishing for you Government Exhibit 151. Do you see
15 151 on your screen?

16 A. Yes.

17 Q. Do you recognize this record?

18 A. Yes.

19 Q. What is it?

20 A. This is a summary of the KYC or know your customer process
21 that was done for this particular applicant.

22 Q. Okay. KYC stands for "know your customer"?

23 A. Yes.

24 Q. And this has the email address for the applicant?

25 A. Yes.

THAKRAL - DIRECT

71

1 Q. We talked a moment ago about emails being verified?

2 A. Yes.

3 Q. What time and date does it show the email was verified?

4 A. March 4, 2024, at 4:36. I believe that's UTC.

5 Q. Let's look at the date a little closer. Do you see 2021?

6 A. Yes.

7 Q. Is that the year?

8 A. Yes.

9 Q. What's 05?

10 A. May.

11 Q. And the date?

12 A. The 4th.

13 Q. So it's May 4th?

14 A. Yes.

15 Q. I thought you said -- I heard -- I may have misheard you.

16 A. I think you're right. I think I misspoke there. Yeah.

17 Q. Okay. And the phone number, it ends in what?

18 A. 786 -- oh, sorry. The phone number ends in 1512.

19 Q. Does this show that this phone number was verified?

20 A. Yes.

21 Q. When was it verified?

22 A. On March 4, 2021 at 4:36. I believe it's UTC is the time
23 zone here.

24 Q. And what's the UTC?

25 A. Universal time coordinate. That's essentially a way to

1 identify which time zone. So in this case, it's the time zone
2 that is 00.

3 Q. Okay.

4 A. It's the referenced time zone.

5 Q. And IP address created application, do you see that?

6 A. Yes.

7 Q. And do you see an IP address ending in 166?

8 A. Yes.

9 Q. Are there other records that show the IP address or data
10 records that show the IP address that would have created this
11 application as well?

12 A. Yes.

13 Q. Okay. We'll look at those in a moment too.

14 Does that provide more detail than what we're looking
15 at here?

16 A. Yes.

17 Q. Do you see where it says "Persona ID completed"?

18 A. Yes.

19 Q. And there's a Y. Do you know what that means?

20 A. That means that this particular application used Persona
21 for identity verification.

22 Q. What is Persona identity verification?

23 A. Persona is a vendor that we used for the identity
24 verification process. Womply did not do it directly. We
25 relied on a vendor, in this case Persona, to carry out that

1 process for us.

2 Q. And just briefly what was the purpose of having the
3 identity of the applicant verified?

4 A. To prove that the user is who they say they are.

5 Q. Now, this document we're looking at has a deal ID?

6 A. Yes.

7 Q. And it has a bank ID?

8 A. Yes.

9 Q. Do you remember what bank ID that is, 2097?

10 A. I believe this is for Lendistry.

11 Q. Is the KYC detail for the loan that was actually funded?

12 A. Yes.

13 Q. Now we're going to look at Government Exhibit 152 in
14 evidence. Do you recognize 152?

15 A. Yes.

16 Q. Okay. What kind of record is this?

17 A. This is a summary of the bank documents that were uploaded
18 by the user.

19 Q. And that was part of the application process?

20 A. Yes.

21 Q. And does Womply have a record somewhere else of the IP
22 address that would have been used to upload these?

23 A. Yes.

24 Q. Would it also have the time that these were uploaded?

25 A. Yes.

1 Q. It actually looks on here that you do have a time stamp;
2 is that right?

3 A. Yes.

4 Q. Can you tell from looking at this when these documents
5 were uploaded?

6 A. Yeah, so these appear to be uploaded on May the 4th of
7 2021.

8 Q. Okay. And, again, this is in connection with the deal
9 that was actually funded?

10 A. Sorry. Sorry. My mistake. There were two documents that
11 were uploaded on May the 4th. One document was uploaded on
12 May the 6th.

13 Q. And is this in connection with the deal that was actually
14 funded?

15 A. Yes, based off the bank ID being 2097.

16 Q. And you spoke about the bank records earlier. Again, the
17 purpose of uploading this was to essentially establish where
18 to send the PPP money?

19 A. Yes. Correct. And I think in certain circumstances, we
20 also required that the bank account was active, depending on
21 the lender, for a certain time period. And so the banks would
22 show that the lender was operating their business within that
23 time period.

24 Q. The lender or the applicant?

25 A. Sorry. The applicant would show -- sorry. Yes. The

1 applicant would show that they were operating their business
2 during that time period.

3 Q. And, to your knowledge, was that one of the requirements
4 of the PPP, that you had to be in business at a certain period
5 of time?

6 A. Yes. If I recall, yes.

7 Q. Did Womply keep a copy of the PDF bank statements that
8 this document we're looking at, 152, shows were uploaded?

9 A. Yes.

10 Q. I've just published 152.1, Government Exhibit 152.1 in
11 evidence. Just taking a look at this, what does this appear
12 to you to be?

13 A. This appears to be a bank statement showing the
14 transactions associated at SunTrust Bank for an organization
15 named Wade Funeral Home LLC.

16 Q. Okay. And I'm going to show you 152.2 in evidence. What
17 does 152.2 appear to you to be?

18 A. This appears to be a bank statement from USAA bank, and it
19 is for Tracy Wade or Carolyn Wade.

20 Q. How about 152.3? What does this appear to be?

21 A. I believe it's -- it's -- is it the same document or it
22 looks like -- well, it's the same bank and the same
23 individuals. I'm not sure if it's the same document or not
24 because I don't --

25 Q. You went a little quickly. I can go back if you like. I

1 can...

2 Do you see the statement period?

3 A. Yeah.

4 Q. We're now looking at 152.2. What's the statement period
5 for 152.2?

6 A. January 7th, 2020, to February 6, 2020.

7 Q. Now we're going to look at 152.3. What's the statement
8 period for 152.3?

9 A. January 29, 2020, to February 26, 2020.

10 Q. I think there's one more here. Let's look at Government
11 Exhibit 152.4 in evidence. What does 152.4 appear to be?

12 A. It's also the bank statement and it's, again, for
13 January 29, 2020, to February 26, 2020.

14 Q. If Womply had these bank statements in its records, that
15 means it was uploaded to Womply?

16 A. Yes.

17 Q. Womply didn't independently go and get bank statements?

18 A. Correct.

19 Q. I'm publishing for you Government Exhibit 153 in evidence.
20 Do you see that?

21 A. Yes.

22 Q. What is Government Exhibit 153?

23 A. This is a summary of the tax documents that were provided
24 to Womply, and it includes both the type of tax document and
25 the year. So in this case, it appears to be a 2019

1 Schedule C. It contains the amount of their income -- of the
2 gross income listed on the tax document as well as that which
3 the user entered into the form on the website.

4 Q. Okay. So let's look at the section where it says "user
5 enter gross income detail."

6 A. Okay.

7 Q. What do you see there in the column that's labeled
8 Schedule C for the year 2019?

9 A. So this appears to be the user entering in a value of
10 97,460 for their 2019 Schedule C.

11 Q. And when you say the user entering the value, where were
12 they entering that value?

13 A. Into a form on the website.

14 Q. And let's look at the section here where it says "OCR
15 gross income detail." Do you see that?

16 A. Yes.

17 Q. What do you see there?

18 A. This is the value that was extracted from the PDF document
19 that was uploaded, and the gross income provided on the
20 document inside the PDF was 112,430.

21 Q. When you say extracted, what do you mean by that, in
22 simple terms?

23 A. We used something called OCR or optical character
24 recognition to scan the text on a document, if it was an image
25 or depending on the type of document, and then we would

THAKRAL - DIRECT

78

1 identify a particular line on the document and then extract
2 out what the value of that line was on the tax form.

3 Q. I'm sorry?

4 A. It's done by a computer.

5 Q. Is it a computer reading a PDF and saying -- the computer
6 is picking up the number 112,430?

7 A. Correct.

8 Q. Which is different than what the user entered?

9 A. Yes.

10 Q. Now, there's a section that says updated gross income
11 detail. Do you see that?

12 A. Yes.

13 Q. What do you see there in the column labeled Schedule C for
14 2019?

15 A. This is 112,430. So this looks to be that our system was
16 able to take the information that the user entered, and it
17 probably found a different line item, probably net income that
18 was on the form itself, and they realized that the user made a
19 typo and then they just did an auto-correction for the user
20 because the user just apparently made a typo and they put the
21 wrong line number in.

22 Q. So if the computer read 112,430 actually on the form --

23 A. Yes.

24 Q. -- that's the one they would --

25 A. Yes.

1 Q. -- put into the PPP application?

2 A. Correct.

3 Q. Do you see the section where it says "other files"?

4 A. Yeah.

5 Q. And are those other files that were uploaded?

6 A. Yes. Correct. It appears to be the same file uploaded at
7 different times based off of the same name of the file, which
8 is tracywade.pdf.

9 Q. Okay. Now, I'm publishing Government Exhibit 154 in
10 evidence. Do you see 154 on your screen?

11 A. Yes.

12 Q. Do you recognize this kind of record?

13 A. Yes. This is a 2019 Schedule C for Tracy D. Wade.

14 Q. All right. And that's the name that appears as the name
15 of the proprietor?

16 A. Yes. Correct.

17 Q. And is that also the name that appears in line A,
18 principal business?

19 A. Yes.

20 Q. What do you see here in line 7?

21 A. The gross income as stated on the tax form as being
22 112,430.

23 Q. Okay. What number do you see down here in line 31?

24 A. The net profit of 97,460 on line 31 of the form.

25 Q. We looked at it a second ago. Is that the number that it

1 appeared that the user had entered, 97,460?

2 A. Yes. I believe that's correct.

3 Q. And then the computer saw that this number for the
4 schedule, for line 7, had been inputted?

5 A. Yes.

6 Q. And Womply kept a copy of the Schedule C that was uploaded
7 to its website --

8 A. Yes.

9 Q. -- for that particular application.

10 So if Womply had a Schedule C, it means that it
11 didn't go and get those on its own. It received it through an
12 upload?

13 A. Correct. Yes. The user had to have provided that
14 information to Womply.

15 Q. Okay. Before I go to the next exhibit, the Schedule C, is
16 that one of the documents that Womply required to be truthful
17 when provided to Womply?

18 A. Yes, I believe so.

19 Q. Now we're looking at Government Exhibit 155 in evidence.
20 Do you recognize that?

21 A. Yes.

22 Q. What is in this record?

23 A. This is a summary of the funding instructions. That is
24 where to send the funds in terms of the account and routing
25 number of the financial institution and the account at that

1 financial institution.

2 Q. Okay. So this is how the lender knew where to send the
3 money?

4 A. Correct.

5 Q. And this is information that Womply had from the user?

6 A. Yes, this is the user's provided bank account.

7 Q. Let me just ask you briefly about Persona. That was done
8 by -- the identity verification was done by Persona, which is
9 a separate company?

10 A. Yes, it's a separate vendor, yes, that we used.

11 Q. And did Womply have access to Persona records?

12 A. Yes, we had access to what's known as their API. That is,
13 we could have a computer query the data as well as it would
14 also share with us PDF documents that sort of summarize the
15 user's identity verification process.

16 Q. And, to your knowledge, did Persona, if they did an
17 identity verification for a PPP applicant, did they keep a
18 record of certain information from that identity verification?

19 A. Yes.

20 Q. Okay. Mr. Thakral, I've just published Government
21 Exhibit 157 in evidence. Do you see that?

22 A. Yes.

23 Q. Do you recognize it?

24 A. Yes.

25 Q. And what is it?

1 A. This is a copy of the SBA Form 2483-C that we were talking
2 about before, and it's -- and it has information filled out
3 for the applicant Tracy Wade.

4 Q. Okay. The information that's in this form came from
5 where?

6 A. From Womply.

7 Q. And how did it get to Womply?

8 A. The user entered it into the Womply website.

9 Q. And just real quick, this is a PPP SBA Form 2483-C form
10 for who?

11 A. Tracy Wade, it appears to be.

12 Q. And the total amount of gross income from IRS Form 1040,
13 Schedule C, line 7, which is the document we just looked at,
14 is how much?

15 A. 112,430.

16 Q. And the tax year used for gross income was what?

17 A. 2019.

18 Q. Is this one of the records that had to have been
19 DocuSigned?

20 A. Yes.

21 Q. And it was DocuSigned when it was sent to a lender --
22 during that lender routing process?

23 A. Yes. Correct. Well, it was after lender selection.

24 After a lender had been selected, a DocuSign would go out --

25 Q. Okay.

THAKRAL - DIRECT

83

1 A. -- for each lender.

2 Q. I'm just going to ask you generally, are you familiar with
3 the -- I'm now on page 3 of Government Exhibit 157.

4 A. Yeah.

5 Q. Are you familiar with the type of information that's on
6 this page?

7 A. Yes.

8 Q. What's the information that's on this page?

9 A. This page is asking the applicant to certify various
10 pieces of information that are stated in the statements and
11 the document.

12 Q. Okay. And what is being certified in the last
13 certification?

14 A. It says that the information and all supporting documents
15 are true and accurate in all material respects.

16 Q. Okay. Do you see these what appear to be initials?

17 A. Yes.

18 Q. And do you see where it says "DS"?

19 A. Yes.

20 Q. What's your understanding of how these initials got onto
21 this document?

22 A. They were captured by DocuSign. DS is shorthand for
23 DocuSign.

24 Q. Now I'm on page 4 of Government Exhibit 157.

25 A. Okay.

1 Q. What is on this page?

2 A. This appears to be a signature as well as a date and the
3 name of the applicant.

4 Q. Okay. And what kind of signature?

5 A. It is a DocuSign signature.

6 Q. And who appears to have signed it?

7 A. Tracy Wade.

8 Q. When a document was signed by DocuSign, are you aware of
9 whether or not DocuSign prepared a certificate of completion
10 that contained information about that electronic signing?

11 A. Yes, they did.

12 Q. Is that something that Womply or someone working with
13 Womply kept?

14 A. Yes.

15 Q. Here's what we're going to do. We're going to put this
16 one -- I'm going to split the screen here.

17 Do you see 157 on the left-hand side of your screen?

18 A. I do.

19 Q. And on the right side of your screen, I've published
20 Government Exhibit 157.1. Do you see that?

21 A. Yes.

22 Q. On the left side, do you see at the top where it says
23 "DocuSign envelope ID"?

24 A. Yes.

25 Q. To your knowledge, is that a unique number for this

THAKRAL - DIRECT

85

1 signing event?

2 A. It's a unique number for all of the documents associated
3 with this particular signing process.

4 Q. Okay. And what are the last four characters for this
5 DocuSign envelope ID?

6 A. Delta, nine, eight, Bravo.

7 Q. Now we're looking at 157.1. I'm directing your attention
8 to it.

9 Do you see the part that I've enlarged? What does it
10 say?

11 A. Certificate of completion.

12 Q. What are the last four characters of the envelope ID?

13 A. Delta, nine, eight, bravo.

14 Q. So is this the certificate of completion for the PPP loan
15 application and SBA Form 2483 that's in Government 157?

16 A. Yes, it appears to be.

17 Q. And let's look at the area where it says "signer events."
18 Do you see that?

19 A. Yes.

20 Q. Do you see a name under signer event?

21 A. Yes.

22 Q. What do you see?

23 A. Tracy Wade.

24 Q. Do you see an email address?

25 A. Yes.

1 Q. And, to your knowledge, is that the email address that
2 was -- to which this document was sent to to be signed?

3 A. Yes.

4 Q. Do you see where it says "time stamp"?

5 A. Yes.

6 Q. Why don't you talk to us about what's in that column.

7 A. So this is capturing the various events with this
8 particular document. So when it was originally sent via
9 email -- and then it looks like it needed to be resent two
10 times before it was viewed by the -- by the email address, and
11 then it was signed shortly thereafter.

12 Q. What is the date and time that it was signed?

13 A. May 18, 2021, at 7:30 AM -- sorry -- 7:31 AM.

14 Q. Let's look at the line you just read, actually. We can
15 start with that one.

16 Is there a time when it was viewed?

17 A. Yes.

18 Q. And what time was that?

19 A. 7:30 AM.

20 Q. On which date?

21 A. On May 18, 2021.

22 Q. And is there a time when it was signed?

23 A. 7:31 AM.

24 Q. And how many seconds?

25 A. 37 seconds, on the same day, May 18 of 2021.

THAKRAL - DIRECT

87

1 Q. All right. Do you see where it says "using IP address"
2 and then there's a number?

3 A. Yes.

4 Q. Do you know what that means?

5 A. That is the IP address that the DocuSign captured on their
6 website for the person who signed it.

7 Q. Okay. Can you read it into the record?

8 A. 174.228.144.190.

9 Q. Okay. Thank you.

10 Now I'm publishing Government Exhibit 158 in
11 evidence. Do you see Government 158?

12 A. Yes.

13 Q. What does this appear to be?

14 A. This appears to be a Form 2483-C for Tracy Wade.

15 Q. Does this look similar to the one we just looked at in
16 Government Exhibit 157?

17 A. Yeah. Based on my memory, it looks to be almost identical
18 or if not identical information.

19 Q. Okay. Including the total amount of gross income?

20 A. Mm-hmm.

21 Q. And the number of employees?

22 A. Yes.

23 Q. And the tax year?

24 A. Yes.

25 Q. Does this PPP application, this Form 2483-C in Government

1 Exhibit 158 -- does this also have certifications?

2 A. Yes, it does.

3 Q. Are they also initialed?

4 A. Yes.

5 Q. And is that done through DocuSign?

6 A. Yes.

7 Q. I'm now on page 3 of Government 158. Does this appear to
8 have a DocuSign signature on it?

9 A. Yes.

10 Q. Who appears to have signed it?

11 A. Tracy Wade.

12 Q. Date?

13 A. May 18, 2021.

14 Q. We looked at a DocuSign envelope ID that was associated
15 with Government 157 that you said for the record ended in
16 Delta, nine, eight, Bravo.

17 A. Yeah.

18 Q. What are the last four characters of this DocuSign
19 envelope ID?

20 A. Five, nine, six, Echo.

21 Q. What does that tell you?

22 A. It's a different DocuSign envelope.

23 Q. Was this a different signing event?

24 A. Yes -- well, presumably yes because it's a different --
25 it's a different document that was required for signature by

1 DocuSign -- or from -- via DocuSign, rather.

2 Q. I'm going to go down a couple of pages. We're now on
3 page 9. It's Bates-stamped 8197. And just for the record
4 here, a Bates stamp is a number that the Government put onto a
5 document to identify it as a document that had been previously
6 sent to the defense in this case.

7 Is this a certificate of completion for the signing
8 event that was a signed envelope ID 596E?

9 A. Yes.

10 Q. Who appears to have signed this one?

11 A. Tracy Wade.

12 Q. And what email address does it appear to have been sent
13 to?

14 A. The tracyw764@gmail.com.

15 Q. Let's look at the time stamps. Do you see that?

16 A. Yes.

17 Q. When was this one sent?

18 A. May 18, 2021, at 9:08 AM.

19 Q. And when was it viewed?

20 A. May 19, 2021, at 10:05 AM.

21 Q. And when was it signed?

22 A. May 19, 2021, at 10:06 AM.

23 Q. So that was a different date and time --

24 A. Yes.

25 Q. -- than the one we looked at in Government 157?

THAKRAL - DIRECT

90

1 A. Mm-hmm.

2 Q. Does it say on this the time zone?

3 A. Yes.

4 Q. What is the time zone?

5 A. Pacific time.

6 Q. Okay. Did this one capture the IP address that was used
7 to sign this SBA 2483-C?

8 A. Sorry. Say it again.

9 Q. Did this certificate of completion capture the IP address
10 that was used to sign this SBA Form 2438?

11 A. Yes.

12 Q. Can you read it into the record?

13 A. 174.211.100.223.

14 Q. I'm now publishing Government Exhibit 159 in evidence. Do
15 you see 159 in evidence?

16 A. Yes.

17 Q. What is this one?

18 A. This appears to be an application for a PPP loan form --
19 SBA Form 2483-C.

20 Q. Okay. Does it appear to have the same information that
21 was in the SBA Form 2483 that we just looked at in Government
22 Exhibits 157 and 158?

23 A. I believe so, yes.

24 Q. And that includes the information from Schedule C, line 7,
25 of \$112,430?

THAKRAL - DIRECT

91

1 A. Yes.

2 Q. And the tax year, 2019?

3 A. Yes.

4 Q. And the number of employees, one?

5 A. Yes.

6 Q. And the business legal name, Tracy Wade?

7 A. Yes.

8 Q. Does this SBA Form 2483-C also have a DocuSign envelope ID
9 on it?

10 A. Yes. It is different from the other two we just looked
11 at.

12 Q. Can you read the last four characters into the record of
13 this one?

14 A. Bravo, bravo, bravo, Charlie.

15 Q. And is that BBBC?

16 A. Yes.

17 Q. Because the court reporter is going to write down bravo.

18 All right. We're now on page 3 of Government 159.

19 Does this page contain the same certifications that were in
20 the previous exhibits that we just looked at, 157 and 158?

21 A. Yes.

22 Q. Do they appear to have been DocuSigned?

23 A. Yes.

24 Q. I should say initialled via DocuSign?

25 A. Yes. Correct.

1 Q. And on page 4 of this Exhibit 159, Bates-stamped 9014,
2 does there appear to be a signature?

3 A. Yes.

4 Q. Does it appear to be DocuSigned?

5 A. Yes, with a different date than the other two.

6 Q. And who appears to have DocuSigned this one?

7 A. Tracy Wade on May 27 of 2021.

8 Q. Now, included in Government Exhibit 159, which also has
9 the same DocuSign envelope ID at the top ending in BBBC is
10 another record. Do you recognize it?

11 A. Yes. This appears to show the -- this appears to be a
12 promissory note to Tracy Wade from Lendistry with the loan
13 amount of 20,833.

14 Q. And it has an SBA loan number?

15 A. Correct.

16 Q. Did Womply keep a copy of a note, if one was created, for
17 a PPP loan?

18 A. Yes.

19 Q. Was the note a document that had to be signed via DocuSign
20 in the PPP application process?

21 A. Yes.

22 Q. Was that something that had to be signed in order for a
23 loan to be funded?

24 A. Yes.

25 Q. I am now on page Bates Stamp 9029 of Government 159.

1 A. Yes.

2 Q. Is there a signature on that page?

3 A. Yes.

4 Q. And who appears to have signed it?

5 A. Tracy Wade.

6 Q. And does it appear to have been signed by DocuSign?

7 A. Yes.

8 Q. And with a DocuSign ID BBBC at the top, is this the same
9 envelope --

10 A. Yes.

11 Q. -- that we just looked at with respect to the actual SBA
12 form?

13 A. Yeah. Correct. So this envelope appears to have two
14 documents, the first one being the SBA Form 2483-C and the
15 second one being this promissory note.

16 Q. We've just jumped to page 20 of Government 159, which is
17 Bates-stamped 9030. Is this the certification of completion
18 for the DocuSign signing event for the SBA 2483-C and note
19 that we just looked at?

20 A. Yes.

21 Q. And who appears to have signed this DocuSign?

22 A. Tracy Wade.

23 Q. And what email address does it appear to have been sent
24 to?

25 A. Tracyw764@gmail.com.

1 Q. Looking at the time stamps, when was it sent?

2 A. May 27, 2021, at 8:25 PM.

3 Q. And when was it viewed?

4 A. May 27, 2021, at 9:31 PM.

5 Q. And when was it signed?

6 A. May 27, 2021, at 9:33 PM.

7 Q. Was the IP address that was used to electronically sign
8 these documents captured?

9 A. Yes.

10 Q. Do you see it on the document?

11 A. Yes.

12 Q. Can you read it into the record, please?

13 A. 174.211.160.92.

14 Q. And this document that we've looked at in 159 and 158 and
15 157, are these documents visible during the signing event when
16 they're being DocuSigned?

17 A. Yes.

18 Q. They're visible to the person who is putting their
19 initials and signature on these documents?

20 A. Yes.

21 Q. Kind of like we're looking at it right now?

22 A. It's no different than if they were printed out and signed
23 directly.

24 MR. SNIDER: Your Honor, we're going to go through
25 another set of documents. I'm happy to keep going or I just

THAKRAL - DIRECT

95

1 wanted to let the Court know this is also a good time for a
2 break, but I'm happy to keep going.

3 THE COURT: I plan to break at 12:30.

4 MR. SNIDER: Let's keep going.

5 THE COURT: One moment. Would you rather break now
6 or -- all right, 12:30.

7 Do you want to have a seat?

8 MR. SNIDER: No, it's fine. I'm just standing on
9 one foot.

10 BY MR. SNIDER:

11 Q. Let's look at Government Exhibit 100. Do you recognize
12 and see Government 100 on your screen?

13 A. Yes.

14 Q. This is similar to a document we looked at a couple of
15 minutes ago; is that right?

16 A. Yes, except the search was done via an SSN number instead
17 of an application ID.

18 Q. How do you know that?

19 A. Because it's in the top.

20 Q. Right here?

21 A. Yes.

22 Q. Okay. So Womply searched for this SSN and this is what
23 came back?

24 A. Yes.

25 Q. What was the SSN it searched?

THAKRAL - DIRECT

96

1 A. 592-09-0026.

2 Q. When Womply searched for that social security number, what
3 came back?

4 A. It looks like two records associated with the name Carolyn
5 Wade.

6 Q. And did an email address come back?

7 A. Yes.

8 Q. And what is that email address, for the record?

9 A. Ckidd1226@gmail.com.

10 Q. Okay. Did a phone number come back --

11 A. Yes.

12 Q. -- from the search?

13 A. The number is (954) 274-6800.

14 Q. And is this the name, email address, and phone number that
15 would have been inputted into a PPP loan application?

16 A. Yes.

17 Q. We already talked about the social security number. How
18 about DOB?

19 A. The date of birth is March 7, 1975.

20 Q. And I'm looking at two rows of data. Do you see that?

21 A. Yes.

22 Q. Do you see the same date of birth --

23 A. Yes.

24 Q. -- in both rows?

25 And the phone numbers and email addresses in both

1 rows, those are the same as well?

2 A. Yes. That's because they have the same application ID.

3 Q. Let's look at the application ID. Can you read, for the
4 record, the last four characters?

5 A. DFB7.

6 Q. And that's for both rows of data that we're looking at?

7 A. Yes.

8 Q. What does that tell you?

9 A. That it's the same application ID in Womply's system.

10 Q. All right. Now let's look at the part I've enlarged where
11 it says "deal ID" and "deal stage name."

12 A. Yeah.

13 Q. What do you see there?

14 A. So this appears to be two different deals for one
15 application. One was declined and one was funded.

16 Q. Is this similar to what happened with the previous loan we
17 just looked at for Tracy Wade?

18 A. Yes. It's a similar example.

19 Q. In that instance, there were, I believe, three lenders?

20 A. Yes.

21 Q. Here there are two?

22 A. Yes.

23 Q. And did it appear that one of those lenders funded this
24 loan --

25 A. Yes.

1 Q. -- or have approval to fund?

2 A. Yes. This was Lendistry. I believe that's the same
3 lender as last time.

4 Q. So because there was two lenders as part of this
5 application process, does that mean there would have been how
6 many SBA Form 2483-Cs that had to have been signed?

7 A. Two, assuming these got that far, but yes.

8 Q. Let's take a look at Government 101. Do you see
9 Government 101 on your screen?

10 A. Yep.

11 Q. Is this a similar record that we had looked at previously
12 for the application that was made for Tracy Wade?

13 A. Yes. Correct. This was for Carolyn Wade. It's a summary
14 of the information provided by the applicant. It appears to
15 show a subset of the information.

16 Q. So the same type of information that we looked at, but
17 this is for the application for Carolyn Wade?

18 A. Yes.

19 Q. I'm going to put Government Exhibit 103 on the left side
20 of your screen and Government Exhibit 104 on the right side of
21 your screen, just to speed this along. Do you see both of
22 those?

23 A. Yes.

24 Q. Now, KYC, remind the jury what that stands for.

25 A. Know your customer.

THAKRAL - DIRECT

99

1 Q. And is this the same type of information that we had
2 looked at when we looked at the loan for Tracy Wade?

3 A. Yes, except in this case it's for ckidd1226@gmail.com, and
4 there are two documents here, one for one lender and one for a
5 different lender.

6 Q. Okay. Is that consistent with the fact that this was
7 routed to two different lenders --

8 A. Yes.

9 Q. -- during the process?

10 So there would have been a KYC for both?

11 A. Yes.

12 Q. When was this email addressed ckidd1226@gmail.com
13 verified?

14 A. May the 4th, 2021, at 7:27 PM.

15 Q. All right. And was the phone number verified?

16 A. Yes.

17 Q. And was it verified at the same time?

18 A. Yes, it has the same time stamp.

19 Q. Do you see the IP address that created this application?

20 A. Yes.

21 Q. What are the last three numbers that it ends in?

22 A. 166.

23 Q. And do you have other records showing more detail about
24 the time --

25 A. Yes.

1 Q. -- and the IP address that was captured when this was
2 created?

3 A. Yes. Well, I don't have them. Womply has them.

4 Q. Womply has them, okay.

5 So this has a deal ID and a bank ID?

6 A. Yes.

7 Q. And the Government 104 also has a deal ID and a bank ID?

8 A. Yes.

9 Q. And you said that these were the two lenders that were
10 involved with this application. One funded, one didn't?

11 A. Yes.

12 Q. I publish Exhibit 105 in evidence. Do you see that?

13 A. Yes.

14 Q. Remind the jury what kind of record this is.

15 A. This appears to be a summary of the bank accounts that
16 were provided by the user via Plaid.

17 Q. Okay. And what was Plaid?

18 A. Plaid is a vendor that we used for collecting bank
19 information about applicants.

20 Q. And was this for the same purpose that you had testified
21 before about verifying that the user had a bank account and
22 what the bank details were so that the lender would know where
23 to send the money?

24 A. Exactly.

25 Q. I publish Government Exhibit 106 in evidence. Do you see

THAKRAL - DIRECT

101

1 that?

2 A. Yes.

3 Q. What is this providing a summary of?

4 A. This shows that there are two bank documents that were
5 uploaded, one on May the 4th and one on May the 13th, and they
6 have different file names.

7 Q. Okay.

8 A. And this report was generated for bank ID 2097.

9 Q. Okay. I'm going to show you Government 109. What does
10 this appear to be?

11 A. This appears to be a bank statement for the period of
12 January 29th, 2020, to February 26, 2020, for the
13 accountholders Carolyn D. Wade and Tracy Wade.

14 Q. And what are the last two digits of the account number?

15 A. 2-6.

16 Q. I'm publishing Government Exhibit 110. The same question.
17 What does this appear to be?

18 A. It's the same document for a different period for the same
19 individuals.

20 Q. Bank statement?

21 A. Yes.

22 Q. And, again, if Womply has these documents, that means that
23 they were uploaded to Womply's portal?

24 A. Yes. By the applicant.

25 Q. Just for the record here, I've published 111. What is

1 this?

2 A. This is another bank statement for Carolyn Wade and Tracy
3 Wade at USAA bank.

4 Q. And Government Exhibit 112, which I've just published,
5 what is this?

6 A. This is a -- this looks to be -- this looks to be the same
7 statement.

8 Q. Okay. I'm publishing Government 107. Do you see that?

9 A. Yes.

10 Q. Did we look at this one yet? I don't think so.

11 A. No.

12 Q. What is in this document?

13 A. This summarizes where the funds would be sent to, if the
14 deal was funded, for Carolyn Wade. It shows her bank routing
15 number as well as the account number at the bank.

16 Q. Okay. Now I'm publishing Government Exhibit 108. Do you
17 see that?

18 A. Yes.

19 Q. Is this a similar type of record that we looked at when we
20 were looking at the records from Tracy Wade's PPP loan
21 application through Womply?

22 A. Yes.

23 Q. And what do you see in this document?

24 A. It appears that there's one Schedule C and that the user
25 provided an amount of 96,882. And the computer was able to

1 read a value of 113,560 for the gross income. And then the
2 computer identified that there was probably some sort of issue
3 that they just put the wrong number in and then corrected it
4 to 113,560.

5 Q. When you say put the wrong number in, do you mean a number
6 that was somewhere else on the document?

7 A. Yes, that's correct.

8 Q. Because the Schedule C has different lines?

9 A. Yes.

10 Q. So if it saw that number on a different line, it would
11 make the auto-correction?

12 A. Correct.

13 Q. Okay. I'm publishing Exhibit 113 in evidence. Do you see
14 it on your screen?

15 A. Yes.

16 Q. What are we looking at in Government 113?

17 A. This appears to be a Schedule C for the tax year 2019 for
18 Carolyn Wade.

19 Q. And this is a document that Womply would have received
20 through the application process?

21 A. Yes.

22 Q. And is this the same kind of document that had to have
23 been truthful?

24 A. Yes.

25 Q. Do you see a number in line 7?

THAKRAL - DIRECT

104

1 A. Yes.

2 Q. What do you see there?

3 A. 113,560.

4 Q. And do you see a number in line 31?

5 A. 96,882.

6 Q. And do those appear to be the numbers that both -- with
7 respect to line 31 that a user entered and in line 7, the
8 number that the computer picked up?

9 A. Yes.

10 Q. Now, would there have been an identity verification
11 component of Carolyn Wade's PPP loan application?

12 A. Yes.

13 Q. And would that also have been done through Persona?

14 A. If they were sent at the same time, yes. Presumably, yes,
15 Persona as well.

16 Q. I'm sorry?

17 A. Presumably, yes, Persona as well. I don't recall what the
18 KYC details page said, but presumably it was Persona.

19 Q. I've published Government Exhibit 116 in evidence. Do you
20 see that?

21 A. Yes.

22 Q. What is Government Exhibit 116?

23 A. This is an SBA Form 2483-C for applying for a PPP loan.

24 Q. What is the business legal name?

25 A. Carolyn Wade.

THAKRAL - DIRECT

105

1 Q. And what is the total amount of gross income in line 7?

2 A. 113,560.

3 Q. Is that the same number that we just saw that was in the
4 Schedule C?

5 A. Yes. Correct.

6 Q. And it's for the year 2019?

7 A. Yes.

8 Q. With one employee in the number of employees box?

9 A. Yes.

10 Q. I have enlarged the top portion of this Government 116
11 with the envelope ID. Do you see that?

12 A. Yes.

13 Q. What are the last four characters?

14 A. BF27.

15 Q. Does it appear to you that this is a 2483-C that was
16 DocuSigned?

17 A. Yes.

18 Q. Is this similar to the one that we looked at for Tracy
19 Wade?

20 A. Yes, it appears to be.

21 Q. With regards to the type of form?

22 A. Yes. Correct.

23 Q. I'm on page 3 of Government Exhibit 116. Does this page
24 include the same kind of certifications that we went through
25 in a little more detail with respect to Tracy Wade's PPP

1 application?

2 A. Yes. Correct. And they've been initialed.

3 Q. What are the initials that you see?

4 A. CW.

5 Q. And does it appear that those were put on there through
6 DocuSign?

7 A. Yes.

8 THE COURT: All right, sir. Let's stop you there.
9 We will break for lunch at this time and we will resume at
10 1:35 PM.

11 Thank you. You are excused.

12 (Jury exited at 12:30 PM.)

13 THE COURT: You may step down.

14 Mr. Snider, if you become uncomfortable because of
15 your medical situation, just say so. Don't give me a choice
16 of saying should we break or not because I didn't know it was
17 because of your scenario. So if there's an issue, just let me
18 know.

19 MR. SNIDER: I will. Thank you. I didn't know what
20 time you were planning on breaking, and I had finished with
21 the Tracy Wade portion, so I thought it was a natural time.

22 THE COURT: I'm fine. I'm just letting you know
23 we'll make it as comfortable as possible.

24 MR. SNIDER: Thank you.

25 THE COURT: Enjoy lunch, everyone.

THAKRAL - DIRECT

107

1 (Lunch recess from 12:31 PM to 1:38 PM.)

2 (Jury entered at 1:38 PM.)

3 THE COURT: You may continue.

4 MR. SNIDER: Thank you, Your Honor.

5 BY MR. SNIDER:

6 Q. Good afternoon, Mr. Thakral.

7 Before the lunch break, we were looking at Government
8 Exhibit 116 and we were on page 4 of that document. Do you
9 see that in front of you?

10 A. Yes.

11 Q. And on page 4, do you see a signature block?

12 A. Yes.

13 Q. All right. I'm going to make it enlarged. What do you
14 see in the section that I just enlarged?

15 A. There's a signature which appears just to be two letters
16 and then also the date and the name of the person is Carolyn
17 Wade.

18 Q. What's the date?

19 A. May 18, 2021.

20 Q. And this is one of the Paycheck Protection Program SBA
21 Form 2483-C forms?

22 A. Yes.

23 Q. And this form that we're looking at in Government 116 has
24 a DocuSign envelope ID at the top?

25 A. Yes, ending in BF27.

1 Q. Okay. We're now on page 9 of Government Exhibit 116,
2 which has a Bates number of 2869. Do you see that on your
3 screen?

4 A. Yes.

5 Q. We'll enlarge the section that has the signing events.
6 Actually, before I do, is this a certificate of completion?

7 A. Yes.

8 Q. And what are the last four characters of the envelope ID
9 assigned to this?

10 A. BF27.

11 Q. So is this the certificate of completion for the DocuSign
12 signing event for the 2483-C form in Government 116?

13 A. Yes.

14 Q. Okay. In the section that I've enlarged, what do you see
15 under signer events?

16 A. There's a name, Carolyn Wade, as well as an email address,
17 ckidd1226@gmail.com.

18 Q. Is that the email address to which these documents were
19 sent for signature by DocuSign?

20 A. Yes.

21 Q. Do you see the time stamps?

22 A. Yes.

23 Q. When was it sent?

24 A. So all the events were done on May 18, 2021. It was sent
25 at 6:28 AM, it was viewed at 7:54 AM, and it was signed at

1 7:56 AM.

2 Q. Okay. And does this certificate of completion capture the
3 IP address that was used to sign these documents?

4 A. Yes. It is 174.228.6.224.

5 Q. I'm sorry. The last three?

6 A. .224.

7 Q. Okay. Thanks.

8 And what is the time zone for the time stamps that
9 you just read?

10 A. Pacific time.

11 Q. I'm publishing Government Exhibit 117 in evidence. Do you
12 see that on your screen?

13 A. Yes.

14 Q. What is Government 117?

15 A. It is a Paycheck Protection Program application, also
16 known as SBA Form 2483-C, and it appears to be a different
17 envelope here ending in 6F00.

18 Q. Okay. So a similar document, a different envelope ID?

19 A. Yeah.

20 Q. What does that tell you?

21 A. That it's associated with a different lender.

22 Q. And was it signed at a different time?

23 A. Yes, presumably. I can't tell you because I don't see the
24 data, but presumably it was signed at a different time.

25 Q. All right. Well, we'll look at that.

1 And does this Government 117 appear to have the same
2 information that was in the SBA Form 2483-C that was in
3 Government Exhibit 116?

4 A. Based on my memory, yes.

5 Q. And that includes the total amount of gross increase from
6 IRS Form 1040 --

7 A. Yes.

8 Q. -- line 7 --

9 A. Correct.

10 Q. -- of \$113,560?

11 A. Correct.

12 Q. Does this SBA Form 2483 appear to have the same
13 certifications as the other SBA Form 2483-C that we looked at
14 for Carolyn Wade?

15 A. Yes. The forms are identical.

16 Q. Does it show that these were initialed CW using DocuSign?

17 A. Yes.

18 Q. Now we're on page 4 of Government 117. Does this appear
19 to have a signature block?

20 A. Yes.

21 Q. Does it appear to be signed?

22 A. Yes.

23 Q. Who is the signer?

24 A. The name of the signer is Carolyn Wade.

25 Q. What is the date on which this SBA 2483-C was signed?

THAKRAL - DIRECT

111

1 A. May 28, 2021.

2 Q. Government 117 that we're looking at now, on page 9, does
3 this appear to have the note that was part of Carolyn Wade's
4 PPP loan application?

5 A. Yes.

6 Q. Is this in the same DocuSign set of documents?

7 A. Yes. It's in the same envelope.

8 Q. Does this note appear to have been signed through
9 DocuSign?

10 A. I can't tell right now, but presumably. Yes, it --

11 Q. Now we're on page 19. Do we see a signature on 19?

12 A. Yes.

13 Q. Is it DocuSigned?

14 A. Yes.

15 Q. Who appears to have DocuSigned it?

16 A. Carolyn Wade.

17 Q. Now we're on page 20 of Government 117. The Bates number
18 is 2969. Is this a certificate of completion with the SBA
19 Form 2483-C and the note that we just looked at --

20 A. Yes.

21 Q. -- with an envelope ID ending in 6F00?

22 A. Yes.

23 Q. Do you see the signer events?

24 A. Yes.

25 Q. And whose name is in the signer event?

THAKRAL - DIRECT

112

1 A. The same as prior, Carolyn Wade with the same email
2 address as before.

3 Q. And the time stamps?

4 A. So these were all done on May 28, 2021. It was sent at
5 11:26 AM, viewed at 2:15 PM, and signed 43 seconds later, also
6 at 2:15 PM. And this is all in Pacific time.

7 Q. Does this certificate of completion capture the IP address
8 that was used to sign --

9 A. Yes.

10 Q. -- these documents on May 28, 2021?

11 A. Yes. The IP address is 107.131.161.84.

12 Q. Mr. Thakral, during the PPP application loan process, did
13 Womply ever send emails to the email address that was on the
14 PPP loan application?

15 A. Yes. We sent both marketing emails as well as
16 transactional emails.

17 Q. Did Womply keep a copy of those -- or did Womply keep a
18 copy of the template of those emails?

19 A. Yes, I believe so.

20 Q. Do you know what an email campaign is?

21 A. It's an instance where a particular email is sent out to a
22 group of individuals or a group of email addresses that all
23 match that same campaign that share a common template.

24 Q. So a common template that can be sent to multiple email
25 addresses?

1 A. Correct.

2 Q. And did Womply do that?

3 A. Yes.

4 Q. I'm going to publish on the left side of your screen
5 Government Exhibit 120, and I'm going to publish on the
6 right-hand side of your screen Government Exhibit 120.1.

7 Do you see those exhibits on your screen?

8 A. Yes.

9 Q. Do you recognize them?

10 A. This appears to be a table showing --

11 Q. Let's start with which one you're talking about. On the
12 left side, 120 --

13 A. Well, they both appear to be the same table, and both
14 tables contain an email address, a workspace, a newsletter ID,
15 and a campaign send date.

16 Q. What is the email address that is in the table in
17 Government 120?

18 A. Ckidd1226@gmail.com.

19 Q. And what is the email address listed in the table of
20 120.1?

21 A. Tracyw764@gmail.com.

22 Q. And what is the Workspace Fast Lane 2021?

23 A. They're both the same for both.

24 Q. What is that?

25 A. Oh, the reference to Workspace? I think that's just a --

1 that's just for all Fast Lane emails in that group, regardless
2 of the template. They're all attributed to the same
3 Workspace.

4 Q. Was Fast Lane, the PPP part of Womply's -- was Fast Lane
5 the name of Womply's PPP program?

6 A. Yes. Correct.

7 Q. Now, do you see where it says "newsletter ID"?

8 A. Mm-hmm.

9 Q. Do you know what that is?

10 A. That is -- that is probably a template that was used for a
11 specific email.

12 Q. Okay. And do you see where it says "campaign send date"?

13 A. Yes.

14 Q. Do you know what that means? I'm going to make the first
15 one bigger just so you can see it.

16 A. That is when the -- the -- either that specific email was
17 sent or when the campaign itself was sent. I'm actually not
18 sure which one of the two it is, but it's either for the email
19 itself or for the entire campaign.

20 Q. But if this email was part of that campaign, then that's
21 when this email would have been received?

22 A. That would have been the earliest time that it could have
23 been received.

24 Q. And is that information also in the table that's in
25 Government 120.1?

1 A. Yes.

2 Q. We're going to look at now some of these newsletters. Did
3 Womply keep a copy of them?

4 A. Yes.

5 Q. I'm going to put 120 on the top left part of your screen.
6 I'll make it bigger -- I know it's hard to see right now --
7 and 120.1 on the bottom left. I'm going to start over. I'm
8 publishing on the right side of your screen Government
9 Exhibit 147. Do you see that?

10 A. Yes.

11 Q. Does Government 147 appear to have a newsletter ID?

12 A. Yes.

13 Q. And what is the newsletter ID that you see?

14 A. 1051.

15 Q. Does it appear from cross-referencing Government 120.1
16 that newsletter 1051 was sent to the email address
17 tracyw764@gmail.com?

18 A. Yes.

19 Q. And can you read or describe what is being communicated in
20 this email?

21 A. This is requiring that the user go back into their
22 application and complete an identity check.

23 Q. Did Womply send emails like this as a reminder that there
24 was a next step to take in the application process?

25 A. Yes.

1 Q. And those emails were sent to the email associated with
2 the application?

3 A. Correct.

4 Q. Now I'm publishing for you Government Exhibit 121 on the
5 right side of your screen. Do you see that?

6 A. Yes.

7 Q. Does this have a newsletter?

8 A. Yes.

9 Q. What's the number?

10 A. 1122.

11 Q. Okay. And if we cross-reference that with Government
12 Exhibit 120 on -- do you see campaign or newsletter ID --

13 A. Yes.

14 Q. -- 1122 in that table?

15 A. Yes.

16 Q. Who does it appear that was sent to?

17 A. Ckidd1226@gmail.com.

18 Q. And the date it was sent?

19 A. May 13, 2021, at 10:23 UTC.

20 Q. What does it say in the email that was sent to that email
21 address, the ckidd email address in Government Exhibit 121?

22 A. It appears that the application is incomplete. Here's a
23 link that they can use to continue the application, and that's
24 about the extent of the content there.

25 Q. So is this another reminder email?

1 A. That's a reminder email.

2 Q. Let's take a look at Government Exhibit 122. Do you see
3 122?

4 A. Yes.

5 Q. What's the newsletter ID?

6 A. 1214.

7 Q. Does it appear that this 1214 was sent to the ckidd email
8 address?

9 A. Yes.

10 Q. Does it appear that this one was sent to the tracyw764
11 email address?

12 A. Yes.

13 Q. And what is in the actual template Government 122?

14 A. So this is just letting lenders know this is an
15 informational email, that Womply is still processing
16 applications and that they've added a lender, that the status
17 is maybe changing around in a strange or unusual way, but this
18 is just a result of the lender routing process that we're
19 doing internally to help as many people get funded as
20 possible, and it's also asking them to contact Congress via
21 filling out a form on a website, fairppp.com.

22 Q. And with respect to the first paragraph where it says
23 "We've added more lenders to Fast Lane, including" -- and it
24 gives a bunch of lenders to enable us more -- and then in the
25 second paragraph it says "You may have noticed some unusual

1 changes." The process of moving hundreds of thousands of
2 applications between lenders, if an application got moved from
3 one lender to another, is that one of the examples that would
4 have caused an applicant to have had to resign one of these
5 DocuSign --

6 A. Yes.

7 Q. -- Form 2483-C?

8 A. Yes.

9 Q. And is this email letting the -- in this case the two
10 people whose email address is ckidd and tracyw --

11 A. Yeah.

12 Q. -- letting them know that that may happen?

13 A. Correct.

14 Q. Now, if SBA Form 2483-C was sent to the email address for
15 that application, for that applicant, and it wasn't DocuSigned
16 immediately, did Womply send reminders to the applicant to do
17 the DocuSign?

18 A. Yes, I believe so.

19 Q. Showing you Government Exhibit 122 on the right side of
20 your screen. Do you see that?

21 A. Mm-hmm.

22 Q. That appears --

23 A. That's the same email.

24 Q. Let's look at Government 123. Okay. Do you see
25 Government 123 on the right side of your screen?

THAKRAL - DIRECT

119

1 A. Yes.

2 Q. Are you familiar with this?

3 A. Yes.

4 Q. What does it say in this template, the email template
5 that's Government Exhibit 123?

6 A. This appears to be a reminder email to go ahead and
7 sign -- sign the document.

8 Q. Okay. What does it say specifically in bold at the top?

9 A. "If you still want a loan, you must sign immediately."

10 Q. And what are the instructions?

11 A. To go to your email and then find the document in question
12 and then review the document and to then sign it.

13 Q. Then what do you do in Step 2?

14 A. You sign it.

15 Q. What is the newsletter ID for Government 123?

16 A. 1216.

17 Q. Does it appear that 1216 was sent to the ckidd email
18 address?

19 A. Yes.

20 Q. Does it appear that Government 123, newsletter 1216, was
21 sent to the -- do you see it on the tracyw --

22 A. No, I do not.

23 Q. Publishing Government 127 on the right side of your
24 screen. Do you see that?

25 A. Yes.

1 Q. Is this the same type of document that we just looked at?

2 A. It appears to be the same -- the same template as before.

3 I'm not sure what has changed, but it has a different template

4 ID.

5 Q. Okay. What's this template ID for Government 127 --

6 A. 1229, but the content appears to be the same.

7 Q. Okay. And that is the instructions for DocuSigning --

8 A. Yes.

9 Q. -- and a reminder?

10 So this newsletter 1229. Does it appear that
11 newsletter 1229 was sent to the ckidd email address?

12 A. Yes.

13 Q. Does it appear that the newsletter 1229 was sent to the
14 tracyw764 Gmail address?

15 A. Yes.

16 Q. I've pulled up another exhibit, Government Exhibit 134.
17 Here's the newsletter ID 1268. Do you see that?

18 A. Yes.

19 Q. What's in this template?

20 A. It appears to have the same content as the other two but a
21 different template ID.

22 Q. Okay. And that content is what?

23 A. It's a reminder email to sign the DocuSign documents.

24 Q. This is newsletter 1268?

25 A. Yeah.

THAKRAL - DIRECT

121

1 Q. Does it appear that newsletter 1268 was sent to
2 ckidd1226@gmail.com?

3 A. Yes.

4 Q. Does it appear that newsletter 1268 was sent to
5 tracyw764@gmail.com?

6 A. Yes.

7 Q. Were these reminders keep being sent until the document
8 was DocuSigned?

9 A. Correct.

10 Q. Let's take a look at Government 138. Do you see 138 on
11 your screen?

12 A. Yes.

13 Q. And what is this email describing or related to?

14 A. It is notifying users that there is a way to apply for
15 forgiveness with the SBA for their loan -- for their PPP loan.

16 Q. Are you familiar with the SBA PPP program having a
17 forgiveness aspect to it? Are you aware that it had --

18 A. Yeah, yeah, I'm aware. I'm not familiar with the
19 specifics of the program.

20 Q. Was that something that Womply ran, the forgiveness part?

21 A. No, not that I can recall.

22 Q. And this is newsletter 1500?

23 A. Yes.

24 Q. Does it appear that newsletter 1500 was sent to the
25 ckidd1226@gmail.com email address?

THAKRAL - DIRECT

122

1 A. Yes.

2 Q. Does it appear that newsletter 1500 was sent to the
3 tracyw764@gmail.com email address?

4 A. Yes.

5 Q. What date was it sent to the tracyw? You can see that --

6 A. Yeah, August 7 at 7:00 AM UTC.

7 Q. Okay. And let's go back and look at Government 120.

8 What's the date it appears it was sent to the ckidd1226
9 address? This is newsletter ID 1500.

10 A. August 7, 2021, at 7:15 AM UTC.

11 Q. The same date?

12 A. Yeah.

13 Q. Mr. Thakral, at the beginning of your testimony today, I
14 asked you whether Womply had databases that kept all of the
15 information that it collected during the PPP application
16 process. Do you remember that?

17 A. Yes.

18 Q. And what did you say?

19 A. Yes.

20 Q. Okay. And are you familiar with those records?

21 A. Yes.

22 Q. I am going to show you what is in evidence as Government
23 Exhibit 162E. Do you see Government Exhibit 162E on your
24 screen?

25 A. I do.

1 Q. Do you recognize it?

2 A. Yes.

3 Q. And what is it that we're looking at in 162E?

4 A. This appears to be a list of transactions that occurred on
5 a -- for a single application ID. So it's an application ID
6 that's got one row within the database, and these are
7 individual transactions or operations on that row, and it
8 captures both insertions and updates.

9 Q. Okay. And what format or program are we looking at in
10 162E?

11 A. I'm not sure I understand what you're asking.

12 Q. Well, you have on your screen some rows.

13 A. Yeah.

14 Q. Do you know what program we're looking at as far as, you
15 know, the application?

16 A. Oh, this is for a PPP application.

17 Q. I understand, but the computer -- I'm using a Windows
18 computer. Do you know --

19 A. Using Excel.

20 Q. Excel?

21 A. It's a spreadsheet, yes.

22 Q. A spreadsheet. That question was probably too simple for
23 you.

24 So we're in Excel; right?

25 A. Yeah.

1 Q. And there are all of these lines of data?

2 A. Mm-hmm.

3 Q. Do you know how it got from Womply's system into this
4 Excel sheet?

5 A. Yes. I wrote it.

6 Q. You extracted it?

7 A. I wrote the query, the database query that generated this.

8 Q. You didn't write the information that's in here?

9 A. No. Correct. I wrote the -- I wrote the instructions
10 that refreshed the information and exported it into this
11 format.

12 Q. Export. Explain to the jury what you mean by export.

13 A. So we had data sitting within our database, and in order
14 for us to communicate them with the parties outside of my
15 database, we need to export it. So that is, write a query to
16 filter out the appropriate rows and transform them into a
17 format that was consumable by a different program, in this
18 case Excel.

19 Q. So it's easy to read?

20 A. Yes.

21 Q. And you said column A has transaction ID?

22 A. Yes.

23 Q. Does Womply assign a transaction ID for every transaction
24 that occurs on its website within a PPP application?

25 A. For the databases that I was working on primarily, yes.

1 Q. So all of these transaction IDs that are in rows 2
2 through 30 of this Excel document, Government Exhibit 162E --

3 A. Yes.

4 Q. -- those are all different numbers?

5 A. Correct. Yes. In this case, a transaction is an
6 insertion update to a particular row.

7 Q. Okay. Now I'm looking at column B. Do you see that?

8 A. Yes.

9 Q. And the header of that column is what?

10 A. Remote, underscore, ADDR, short for address.

11 Q. And does it appear to you there's a bunch of numbers in
12 column B?

13 A. Yes. These are all IP addresses.

14 Q. Okay. And specifically, IP addresses associated with
15 what?

16 A. So it's the IP address that caused that transaction to
17 take place.

18 Q. So these transactions that we're looking at came from the
19 IP addresses that are listed in column B?

20 A. Yes.

21 Q. Do you see column C?

22 A. Yes.

23 Q. What's the header?

24 A. Issued at.

25 Q. And it appears that there's a bunch of dates and times?

1 A. Yes.

2 Q. What do those dates and times represent?

3 A. When the transaction occurred.

4 Q. Do you see column D?

5 A. Yes.

6 Q. What's the header?

7 A. Applicant user ID.

8 Q. What information is in column D?

9 A. That is the internal Womply user ID associated with the
10 user that created the PPP application or in this case the MCA
11 application ID as it's listed in the table.

12 Q. MCA table, is that a fancy word for one of the places
13 where you store this information?

14 A. It's got some historical context, but in this case it
15 represents the PPP application -- sorry -- it's the identifier
16 for the PPP application.

17 Q. Now I'm looking at column E, which is MCA, underscore,
18 application ID. Do you see that?

19 A. Yes.

20 Q. What are the last four characters, if you can see it?

21 A. CB8B.

22 Q. And does it appear that those last four characters are the
23 same in all 30 rows here?

24 A. Yes.

25 Q. So this is for transactions all in one PPP application?

1 A. Yes.

2 Q. All right. Do you see where it says "operation type"?

3 A. Yes.

4 Q. I see zeroes and ones. Do you see that?

5 A. Yes.

6 Q. What's a zero?

7 A. A zero means the record was inserted.

8 Q. What does that mean?

9 A. It means a new row was added to the database.

10 Q. Okay. In other terms, how would you describe it?

11 A. So a database is just a collection of rows with a given
12 format -- in this case a set of columns -- and so when you
13 insert a new record, it would be like it's equivalent to
14 adding a new row to the table that you see here itself.

15 Q. So if it's a zero, does that mean that that piece of
16 information existed before?

17 A. No.

18 Q. So it's a creation?

19 A. It's a creation, yes.

20 Q. Now, the operation table, what does that mean?

21 A. This is the table that was impacted by the transaction.

22 Q. When you say impacted by, what are you saying?

23 A. It was either -- there was an operation done on that table
24 as part of that transaction that either caused an insertion,
25 an update, or a delete to a record.

1 Q. What is the current status of this application?

2 A. That is at the time of the export, what is the status of
3 the application in question in column E.

4 Q. And this application, at the time you exported this data,
5 was what? The status.

6 A. I'm not sure when this data was exported.

7 Q. Well, what does it say in H, though?

8 A. Oh, it just says it's the current status.

9 Q. Okay. And below that?

10 A. Approved.

11 Q. Does that mean this application was approved?

12 A. Yes, at the time of export, correct.

13 Q. All right. What is the first and last name?

14 A. That is the first and last name associated with the
15 application in column E.

16 Q. And the date of birth?

17 A. Yeah, the same thing for columns K through -- I'm not sure
18 how far this table goes, but -- they should all be associated
19 with that application ID in column E, yes.

20 Q. So is it fair to say that this table is capturing
21 information that was inputted for this application?

22 A. Yes.

23 Q. Now, let's go back to the table B.

24 A. Okay.

25 Q. All right -- which has -- you testified has the IP address

THAKRAL - DIRECT

129

1 that was used in order to input this information?

2 A. Yep.

3 Q. What's the first IP address that you see? What does it
4 end in?

5 A. 166.

6 Q. Does column C appear to be in chronological order?

7 A. Yes. That's what it looks like to me.

8 Q. And column F has a zero?

9 A. Yes.

10 Q. So what does that mean as far as what this IP address
11 ending in 166 did?

12 A. That's when it created the application.

13 Q. Are you familiar about Microsoft Excel?

14 A. Yes.

15 Q. Do you know that data can be filtered?

16 A. Yes.

17 Q. So what I'm going to do here is I'm going to filter for
18 the IP address ending in 166. Do you see that?

19 A. Yes.

20 Q. How many transactions do you see here from the 166
21 address?

22 A. Two.

23 Q. Okay. And the date is?

24 A. May the 4th, 2021, at 4:37 and 4:38 PM UTC.

25 Q. Okay. I'm going to filter for an IP address starting at

1 174.

2 A. Okay.

3 Q. I filtered, for the record, IP address 174.228.132.36.

4 Have I filtered for that IP address?

5 A. Yes.

6 Q. And how many rows of data there do you see having made
7 transactions from that IP address?

8 A. I believe it's 11, based off the count in the bottom right
9 corner.

10 Q. We're going to look at now Government Exhibit 163E. Do
11 you see Government Exhibit 163E on the screen?

12 A. This is 163, not 163E.

13 Q. You're right. This is 163 we're looking at.

14 And in what program are we using to look at this?

15 A. Excel.

16 Q. Let me just make sure that it's first unfiltered. Okay.
17 Does it appear to be filtered right now?

18 A. No.

19 Q. What information is captured in this Government 163?

20 A. So there's an identifier which should either be a phone or
21 email address. There is --

22 Q. Let me stop you right there.

23 A. Yeah.

24 Q. What do you mean by identifier?

25 A. So identifier here is column A.

1 Q. Okay. And when you say identifier, a phone or email
2 address, what are you seeing in column A?

3 A. Sorry. So this table describes a set of logins or login
4 attempts that a user made. And whenever a user tries to log
5 in, they're going to be using either their phone or email
6 address to log in. And so that phone or email would be the
7 identifier associated with that particular login attempt. So
8 rows 2 through 31 are different login attempts by the user.

9 Q. You testified earlier about, you know, a short-lived
10 one-time code. Do you remember that?

11 A. Yes.

12 Q. And can you tell from looking at this spreadsheet where
13 the one-time code was sent?

14 A. Yes. To the identifier.

15 Q. And is that a phone number or an email address?

16 A. In this case, it's a phone number.

17 Q. So Womply kept track of logins to its website?

18 A. Yes.

19 Q. Is that true whether the login was successful or not?

20 A. Yes.

21 Q. Does it show you anywhere on this spreadsheet whether the
22 login was successful?

23 A. Wherever column C is true, it was successful, and wherever
24 column C was false, it was unsuccessful.

25 Q. So just looking at the first one, the identifier is a

1 phone number that ends in 1512; is that correct?

2 A. Yes.

3 Q. And was that a successful login that occurred at the time
4 and date that's in column B?

5 A. Yes.

6 Q. Is that May 4, 2021?

7 A. Yes.

8 Q. So in order for that login to have been successful, would
9 a one-time code have to have been sent to this phone number in
10 column A?

11 A. Yes, and the user would have had to enter in that phone
12 number on the website as well in order for it to be
13 successful.

14 Q. Did Womply's website with respect to the PPP ever have a
15 permanent password that you could enter?

16 A. No -- I don't recall.

17 Q. It's just these one-time codes?

18 A. Yeah.

19 Q. Now, in column D, it says "login attempt ID"; is that
20 right?

21 A. Yes.

22 Q. And what is the information displayed there?

23 A. That is a unique identifier for every record that any
24 identifier tried to log in.

25 Q. So every time there was a login attempt, whether

1 successful or not, Womply assigned an ID to that login?

2 A. Correct -- to that login attempt.

3 Q. To that login attempt.

4 Column E says browser. What information is there?

5 A. This appears to be the browser that was used to carry out
6 the login process.

7 Q. So that's information that Womply captured as well?

8 A. Yes.

9 Q. The browser that was used to perform the login --

10 A. Yes, that was part of the metadata associated with the
11 login.

12 Q. All right. And operational system, what's captured there?

13 A. The operating system that was used, in this case Windows,
14 IOS, or Android for the rows in this table.

15 Q. Okay. Column G, do you see that?

16 A. Yes.

17 Q. What's in column G?

18 A. The IP address that was used for that login.

19 Q. And then column H, where it says "user agent" --

20 A. Yeah.

21 Q. -- what information is there?

22 A. This describes a combination of the operating system, its
23 version, as well as the Apple web kit or Chrome version,
24 et cetera. So it is a -- it's a -- it's a computer-readable
25 string that identifies a particular device.

1 Q. It identifies a particular device?

2 A. Well, I would say it's a type of device, whether it's like
3 an Android phone or an Apple phone. It's not an individual
4 device on the network but, like, is this person using an
5 Android phone or are they using a Windows laptop or what have
6 you.

7 Q. So, for example, I have highlighted rows 3 through 6 of
8 Government 163 --

9 A. Yes.

10 Q. -- do you see that?

11 A. Yes.

12 Q. What is the IP address that was used for these logins?
13 What does it end in?

14 A. 166.

15 Q. Were these logins that I've highlighted in rows 3
16 through 6 successful?

17 A. Yes.

18 Q. And what type of operating system was used?

19 A. This appears to be a Windows machine.

20 Q. Is that like a desktop or a computer?

21 A. I can't tell what it was, but it was a Windows machine --

22 Q. Okay.

23 A. -- and that's consistent with the browser being Edge in
24 this case.

25 Q. Is it also consistent with the information that's in the

1 user agent column?

2 A. Yes. Correct.

3 Q. I'm going to filter again. I'm filtering, for the record,
4 column G, and I'm typing in the numbers 174. Do you see --

5 A. Yes.

6 Q. -- what I have filtered?

7 A. Yes.

8 Q. Does it appear that I have filtered all IP addresses that
9 start with the numbers 174?

10 A. Yes.

11 Q. And how many logins occurred from an IP address starting
12 in 174?

13 A. Can you please just highlight one column, so I can see the
14 count.

15 Q. Sure. So we'll highlight column G.

16 A. Yeah. It will be ten, then.

17 Q. And what was the operating system for those ten logins?

18 A. Android.

19 Q. And what kind of browser?

20 A. Chrome.

21 Q. What was the first date of the logins with the 174 IP
22 address as I filtered?

23 A. May 6th.

24 Q. What was the last one?

25 A. July 26th.

1 Q. Do you see in column H a model number of a cell phone?

2 A. Yes. The user agent appears to show Model SM-G998U.

3 Q. So according to Womply's records, that model cell phone
4 using these IP addresses logged in at the times in column B,
5 and as reflected in column C, these were all successful
6 logins?

7 A. Yes.

8 Q. And they were logged in using a one-time code sent to the
9 phone in column A?

10 A. Yes.

11 Q. Now, is there more than one Microsoft Excel sheet in
12 Government Exhibit 163?

13 A. Yes. There are two.

14 Q. And we've been looking at the first one?

15 A. Yes.

16 Q. Let's look at the second one now. Do you see the second
17 sheet?

18 A. Yes.

19 Q. What is the name of that sheet?

20 A. Events.

21 Q. What information is contained in the sheet called "events"
22 of Government 163?

23 A. This appears to be a table showing the time stamps that
24 three different kinds of events occurred that -- whether it
25 was a file upload, a bank link, or a Persona inquiry created.

1 Q. If someone had logged in to Womply but not done anything
2 other than log in, would that have been reflected in the first
3 sheet we looked at, just the login attempt?

4 A. In the first sheet, yes.

5 Q. And is the second sheet showing actual events occurred?

6 A. Yeah, actions taken by the user.

7 Q. Thank you.

8 Actions taken by the user?

9 A. Yeah.

10 Q. I'm going to filter column -- let's just, for the record,
11 column A has a time stamp?

12 A. Yes.

13 Q. Column B has the event type?

14 A. Yes.

15 Q. Column D has the IP address that was used for that event?

16 A. Yes.

17 Q. And I see user agent column E. Is that the same type of
18 information that was in the user agent column of the first
19 sheet login attempts?

20 A. Correct.

21 Q. And then column F has what?

22 A. It is -- it's just a document identifier. If it was a
23 file, it was the name of the file that was provided. If it
24 was a bank link or a Persona inquiry, it's the personal
25 identifier of that record.

1 Q. I'm now filtering, for the record, column D and I'm
2 filtering for the IP address ending in 166. Do you see that?

3 A. Yes.

4 Q. Were there events in this PPP application from an IP
5 address ending in 166?

6 A. Yes. It looks like two files were uploaded and they have
7 different names.

8 Q. How about the IP address starting with 174? Were there
9 events from that IP address?

10 A. Yes. One was uploading a bank statement, it looks like,
11 and the next one was linking a bank account.

12 Q. I'm filtering now an IP address ending in 125. Do you see
13 that?

14 A. Yes.

15 Q. Was there some events from the 125?

16 A. Yes. This looks like they were uploading a document with
17 the name Tracy Wade twice, and they were also uploading a bank
18 statement, and this was all done via an iPhone.

19 Q. An iPhone, which was different than the device that we had
20 just --

21 A. Correct.

22 Oh, and they also -- they also tried to verify their
23 identity using Persona.

24 Q. You said they tried?

25 A. Well, it's unclear if they were successful or not, but

1 they did make an attempt.

2 Q. I'm showing you now Government Exhibit 164, which has an E
3 at the end. Do you see that?

4 A. Yes.

5 Q. And what are we looking at -- do you recognize the
6 information in 164E?

7 A. Yes. This appears to be an export from our MCA
8 application versions table that shows different columns in the
9 table as they were changed over time.

10 Q. As they were changed over time?

11 A. Yeah.

12 Q. So this is additional records of transactions in this
13 particular application?

14 A. Well, it's one record and then it's a list of changes of
15 that record over time.

16 Q. Okay.

17 A. So this is the audit log that we spoke about before.

18 Q. And in column A, does this have the identifier of the PPP
19 application we're talking about?

20 A. Yes.

21 Q. And that's the characters in CB8B?

22 A. Yes.

23 Q. And just for the record, if we go over to column B, does
24 it have the column name for that application?

25 A. Yes. Tracy Wade.

1 Q. Does it have the date of birth?

2 A. Not yet but eventually.

3 Q. What do you mean eventually?

4 A. Well, because it didn't come in -- it wasn't on the first
5 row. It came in later.

6 Q. So is this showing, step by step, the information as it's
7 being entered into Womply's portal?

8 A. Yes.

9 Q. And if you go over to column W, does that have the IP
10 address that was being used to put in the information?

11 A. Yes.

12 Q. And the three sheets that we just looked at, Government
13 Exhibit 162E, 163, which wasn't saved as an E but it's 163,
14 and then 164E, that all related to the application for Tracy
15 Wade?

16 A. I believe so, but I'm -- I can't tell based off some of
17 the phone numbers that didn't contain a name linking, but I'm
18 pretty sure it's all for Tracy Wade.

19 Q. Let's look now at Government Exhibit 102E. Do you see
20 Government Exhibit 102E on your screen?

21 A. Yes.

22 Q. Is this another Excel sheet?

23 A. Yes.

24 Q. What is the information overall that's being displayed on
25 the Excel sheet of 102E?

1 A. This appears to be various transactions that were carried
2 out on different tables for Carolyn Wade.

3 Q. And does this have the IP address that was used for those
4 transactions?

5 A. Yes.

6 Q. Does each transaction have a unique ID?

7 A. Yes.

8 Q. Does each transaction have a date on which the transaction
9 occurred?

10 A. Yes.

11 Q. Is the application ID in column E the same for all of the
12 data that's in Government 102E?

13 A. Yes.

14 Q. So, for example, what is the IP address that you first --
15 let me ask you this. Is column C in chronological order?

16 A. It appears to be.

17 Q. Okay. And what is the first transaction -- what IP
18 address is associated with the first transaction in this
19 application for Carolyn Wade? What does it end in?

20 A. 166.

21 Q. And do you see transactions from an IP ending 1225?

22 A. Yes.

23 Q. Do you see additional transactions after that ending in
24 166?

25 A. Yes.

THAKRAL - DIRECT

142

1 Q. And do you see transactions after that with an IP address
2 that starts with 174 and ends with 184?

3 A. Yes.

4 Q. I'm showing you Government Exhibit 102.2E. Do you see it?

5 A. Yes.

6 Q. Is this an Excel document?

7 A. Yes.

8 Q. And is this information that came from Womply's database?

9 A. Yes.

10 Q. And describe for the jury what's in 102.2E.

11 A. This appears to be the audit log that was shown before for
12 a different user.

13 Q. Okay. And what is the business name for this application?

14 A. Carolyn Wade.

15 Q. And the one we looked at before was?

16 A. Tracy Wade.

17 Q. So does this show, step by step, all the changes that were
18 made in Carolyn Wade's application on Womply's website?

19 A. Yes.

20 Q. And column W, does it have the IP address that made those
21 changes?

22 A. Yes.

23 Q. And do you see IP address ending in 166?

24 A. Yes.

25 Q. And .125?

THAKRAL - DIRECT

143

1 A. Yes.

2 Q. And more after that ending in 166?

3 A. Yes.

4 Q. And more after that ending in -- starting with 174 and
5 ending in 184?

6 A. Yes.

7 Q. Let's look at Government 102.1E. Do you see that on your
8 screen?

9 A. Yes.

10 Q. Are there two sheets in this Excel document?

11 A. Login attempts and events.

12 Q. Are we looking at the login attempts right now?

13 A. Yes.

14 Q. And what does this information show?

15 A. This is the same as what we showed prior -- this contains
16 both email identifiers and phone numbers whereas the one
17 before only showed a phone number.

18 Q. Okay. And you're looking at the identifier in column A?

19 A. Yes.

20 Q. So if there's an email address there, what does that mean?

21 A. That means -- that means that a one-time code was sent to
22 that email address.

23 Q. And that's what was used to log in?

24 A. Yes. Correct.

25 Q. Do you see a phone number in line 15?

1 A. Yes.

2 Q. What does it end in?

3 A. 6800.

4 Q. What does that mean with respect to the login?

5 A. That there was an SMS sent to that phone number with the
6 one-time code.

7 Q. And is that the code that was used to log in?

8 A. Yes.

9 Q. And, again, column C shows whether the login was
10 successful or not?

11 A. Yes.

12 Q. And if it says "true," what does that mean?

13 A. That it was successful.

14 Q. False means it was not?

15 A. It was not successful.

16 Q. Does column G capture the IP address that was used to
17 perform the login?

18 A. Yes.

19 Q. And does column H include information about the device
20 that was used to do the login?

21 A. Yes.

22 Q. So, for example, if I highlight rows 15, 16, 17, 18, and
23 19, do you see that?

24 A. Yes.

25 Q. Are those logins all from the same IP address?

THAKRAL - DIRECT

145

1 A. Yes.

2 Q. Does it start with 174?

3 A. Yes.

4 Q. End in 184?

5 A. Yes.

6 Q. Were all those logins successful?

7 A. Yes.

8 Q. What identifier, phone or email, was used to perform those
9 logins?

10 A. Phone.

11 Q. And can you tell from column H the model of the device
12 that was used to perform that login?

13 A. I believe it's SM-986 -- sorry -- SM-N986U.

14 Q. And in column F, what is the operational system that was
15 used for that device?

16 A. So it was Android and it was the Chrome browser.

17 Q. What kind of Chrome browser?

18 A. Chrome mobile is what it says here.

19 Q. And that's information that Womply captured during these
20 logins?

21 A. Yes.

22 Q. Let's look at the sheet that is labeled events. Do you
23 see that?

24 A. Yes.

25 Q. What are we looking at here in this sheet in

1 Government 102.1E?

2 A. This shows a list of file uploads and bank links for this
3 particular application.

4 Q. Okay. Does it show the date of the upload?

5 A. Yes, it shows the date and the type and then the IP
6 address that came from the user agent and then the internal
7 identifier, whether it's the file name or an ID within our
8 system.

9 Q. Do you see this table of documents uploaded from an IP
10 address ending in .166?

11 A. Yes.

12 Q. And is the file name of those documents in column F?

13 A. Yes. It's Carolyn_kidd.pdf.

14 Q. Do you see an upload from an IP address ending in 125?

15 A. Yes.

16 Q. And what is that document type?

17 A. It's a tax document.

18 Q. Okay. And, by the way, let's look at the tax document.

19 What kind of device was used, according to user
20 agent, to upload that tax document?

21 A. I believe this was a Windows machine.

22 Q. You believe. Is that what the document shows?

23 A. I can't tell without actually trying to run that through a
24 user agent parser.

25 Q. How about do you see uploads from an IP address ending in

THAKRAL - CROSS

147

1 .184?

2 A. Yes.

3 Q. Do you see a model number for the device that was used for
4 those uploads?

5 A. Yes.

6 Q. What is the model number?

7 A. SM-986U -- sorry. SM-N986U.

8 Q. Does it say anything about the type of operating system
9 for that device?

10 A. It appears to be Android.

11 MR. SNIDER: Okay. The Government tenders the
12 witness for cross.

13 THE COURT: Very well.

14 MR. SNIDER: Thank you, Mr. Thakral.

15 CROSS-EXAMINATION

16 BY MR. WILCOX:

17 Q. Good afternoon, Mr. Thakral.

18 A. Good afternoon.

19 Q. The H is silent; correct?

20 A. Right.

21 Q. Good.

22 Listen, with the -- let me just start here. Would it
23 be fair to say that there were several IP addresses involved
24 with the Wompu (phonetic) --

25 A. Womply.

1 Q. I'm sorry -- Womply portal in connection with Tracy Wade's
2 and Carolyn Wade's PPP applications?

3 A. Yes.

4 Q. Okay. So it would suggest this is a possibility that more
5 than one individual was involved with preparing or inputting
6 information?

7 A. I can't tell that from the data.

8 Q. Excuse me?

9 A. I can't tell that from the data. These are just different
10 IP addresses. I can't tell who the individual was.

11 Q. Exactly.

12 So it could have been multiple individuals inputting
13 information relating to the Wades' PPP applications; is that
14 correct?

15 A. Again, I can't tell from the data, but --

16 Q. Yeah, you can't tell, so you don't know if it's just one
17 person inputting the data, two people inputting the data, or
18 three people inputting the data; right? You don't know?

19 A. Correct. Yeah.

20 Q. But you can't say that, well, it was only -- you can't say
21 based on all of those IP addresses or the information in your
22 possession that Ms. Carolyn Wade inputted all the information
23 into the Womply portal; right? You can't say that; right?

24 A. I can't say that it was only one person who put all the
25 data in.

1 Q. And the same thing with Mr. Wade, you can't --

2 A. Is that the question you're asking? Sir, is the question
3 that you're asking whether or not I can say if only one person
4 input the data in?

5 Q. Right.

6 A. Again, I can't tell from the data.

7 Q. Okay. Now, I'm trying to understand this process as to
8 exactly how the Womply portal interacts with SBA.

9 A. Okay.

10 Q. Okay. So if someone wanted -- and stop me if I get it
11 wrong.

12 If someone wanted a PPP loan and they found out they
13 would have to contact Womply --

14 A. Yeah.

15 Q. -- through some advertisement or word of mouth or
16 whatever -- right? Correct?

17 A. Yes.

18 Q. Okay. Then they go to your website; right?

19 A. Yes.

20 Q. And answer some questions; right?

21 A. Well, first, they would have to log in.

22 Q. Okay. They would have to log in --

23 A. First, they would have to create a user application --
24 sorry -- create a user account and then log in.

25 Q. They would have to create a user account?

1 A. Yes.

2 Q. Now, if someone was preparing or -- excuse me -- if
3 someone was helping another person get a PPP application, they
4 would be able to log into that person's account if they had
5 their identifying information; correct?

6 A. If they had access to their phone or email, then they
7 could log in, yes.

8 Q. Or their telephone number and email address?

9 A. Yes. Correct. But both pieces of information to create
10 the account and then usually one but sometimes both, depending
11 on the security settings, are required.

12 Q. Okay. So in order for someone to access the account,
13 we've already established that there are several IP addresses
14 that have accessed the account. But in order for someone to
15 access the account, all they would need is the identifying
16 information of the borrower; is that correct?

17 A. No, not the identifying information of the borrower. They
18 would need to have the --

19 Q. The account --

20 A. The email address and the phone number to log into the
21 application.

22 Q. Okay. They would have to have the email address and the
23 phone number?

24 A. Yes. And they would have to be able to receive the email
25 within -- or text message within that short time window of

1 about fifteen minutes, typically --

2 Q. Right.

3 A. -- and then enter that into the website to get in.

4 Q. So isn't it true that if a borrower provided their login
5 credentials to a user, the user could file an application on
6 behalf of the borrower?

7 A. Yes. Or they would have had to share the phone code that
8 they received if they didn't actually give someone their
9 phone, yes.

10 Q. And that Fast Lane, could you tell -- just explain what
11 that is again, the Fast Lane.

12 A. Oh, Fast Lane was just the internal name that we used for
13 the PPP program, and it was also within the domain of the
14 website that the users used to log in. The name of the
15 website was pppfastlane.womply.com.

16 Q. I'm just going to ask you to slow down a little bit.

17 A. Sure.

18 Q. I'm just trying to make sure I understand.

19 A. Sure.

20 Q. The information that's inputted into the Fast Lane
21 application, that's a Womply document; is that right?

22 A. That's a Womply website, yes.

23 Q. The Fast Lane -- okay.

24 A. Yeah. Fast Lane is a Womply website for filling out a PPP
25 application.

1 Q. Fast Lane is a website?

2 A. Yes.

3 Q. But there's a -- there's a form on the website that inputs
4 the borrower's numbers and information, and that information
5 goes from the Womply website to the PPP application; is that
6 correct?

7 A. Eventually, yes.

8 Q. Eventually.

9 A. Yeah.

10 Q. Now, I want to talk to you about the DocuSign part again.

11 A. Okay.

12 Q. Let me see. I'm just looking for an application here.
13 Sir, I have a lot of exhibits that were introduced. Give me a
14 second here. I'm showing you what's been introduced as
15 Government Exhibit 157.

16 Now, if I understood your testimony correctly, when
17 it was time to sign this application, the borrower would get
18 an email notification?

19 A. Yes.

20 Q. Now, in this particular case, both Mr. Wade and Mrs. Wade
21 got several email notifications with respect to signing the
22 loan?

23 A. Well, so they got several types of notifications, but I'm
24 not sure how many email notifications they got with respect to
25 signing the loan specifically.

1 Q. Okay. And when the email notification came in, for
2 instance, that, hey, it's time for you to sign the -- the
3 notification said it's time for you to sign the PPP
4 applications; correct?

5 A. Okay. Yeah.

6 Q. Now, when the borrower or you got that notification, what
7 would happen next in order for them to sign the PPP loan
8 application?

9 A. Yeah. So they would receive an email from DocuSign with a
10 link to the DocuSign website, and then they would go into the
11 DocuSign website and review the details and then initial and
12 sign, as appropriate, based off of whatever the website
13 required.

14 Q. Okay. Well, when they clicked on the DocuSign website,
15 what's the first thing that they see?

16 A. It would be -- I'm not sure exactly what they would see --
17 what the first thing would be. But the ultimate thing they
18 would see would be this application. That's sort of the
19 purpose of the email was to take them -- to show them this
20 form and have them click the buttons to sign it.

21 Q. Okay. So you're saying the first thing they would -- let
22 me ask you this. Is it possible for you to recreate this
23 whole process?

24 A. I'm not sure I understand the question.

25 Q. I mean, if you had to demonstrate it. I mean, would it be

1 possible for you to take a computer screen or something like
2 that and just demonstrate how it works step by step?

3 A. I can't demonstrate it exactly for this application. I
4 can demonstrate the DocuSign process generally, if there was
5 such a document link available, but not this specific
6 application.

7 Q. You couldn't demonstrate how this process would work with
8 these PPP applications --

9 A. Not for this one specifically, no.

10 Q. Excuse me?

11 A. Not for these applications specifically, no.

12 Q. I mean, is there a way to recreate the whole process to
13 show -- I mean, is there a way to do that?

14 A. I mean, there -- not easily. Not easily.

15 Q. Okay. I just want to know is there a way to replicate
16 this whole thing so everybody can see what happened, because
17 you're saying that if you click on the website, the first
18 thing that comes up is this -- the face page of the --

19 A. No. So they would be redirected to the DocuSign portal,
20 and there would be some, like, welcome message that DocuSign
21 sends out saying, "Hey, person X is asking you to sign
22 document Y," and you would click continue --

23 Q. Right.

24 A. -- and then at which point a PDF would appear on the
25 screen, and that PDF would be exactly this document as you're

1 showing it with just a digital form as opposed to physical
2 form. And you would be able to -- instead of turning the
3 pages, you would just scroll down.

4 Q. You would just scroll down?

5 A. Yeah.

6 Q. Okay. One moment.

7 Now, if you look at this application here, the first
8 place where someone signs --

9 A. Yes -- well, to be clear, that's an initial, not a
10 signature, it looks like.

11 Q. The initials here?

12 A. Yeah.

13 Q. On the screen, that's going to appear by itself; is that
14 correct?

15 A. No, you would -- as part of the signing process, you would
16 configure both an initial and a signature as you would like it
17 to appear on the document during the signing. And so there's
18 a little section saying, like, "Add an initial," and you would
19 either draw it in by hand and click accept, or you would write
20 your initials in via the keyboard, and then you would adopt
21 that as your initial as well as adopt that as your signature.

22 Q. Mr. Thakral, what I'm trying to say is that when this --
23 where this initial is, this TW is --

24 A. Yes.

25 Q. -- on the screen, that's the only thing that's going to be

1 there; right? That sentence.

2 A. The user would have to actively click each time they want
3 to put their initial in on the screen.

4 Q. Right.

5 And every time they click, the whole document doesn't
6 appear, just that sentence that --

7 A. No, it's the whole document. It's the whole document on
8 the screen, the whole time -- well, sorry. To be fair, it's
9 the page that they're on. Obviously, it depends how big their
10 screen is.

11 Q. It's the page that they're on, not the entire --

12 A. It's the page that they're on, yeah.

13 Q. I want to show you all 157.1. Now, could you tell us what
14 this document is again?

15 A. So this is a page that's generated by DocuSign, and this
16 is known as a certificate of completion, and it sort of
17 summarizes the metadata around the document.

18 Q. Now, to the bottom, these time stamps here --

19 A. Yes.

20 Q. -- they're both the same; right? Signer events and
21 envelope summary events. The time stamps are both the same
22 for those; right?

23 A. Well, no, the center events has got one row that's not in
24 the envelope summary events.

25 Q. Let's go to this envelope summary events.

1 A. Okay.

2 Q. Now, delivered -- when it says "delivered" at the
3 second -- the second line there. Do you see where I'm
4 pointing?

5 A. Yes.

6 Q. And it says, "Delivered at 5/18/2021 at 7:30:50 AM"?

7 A. Yeah.

8 Q. And then it says, "Signing complete at 7:31:37"; is that
9 right?

10 A. Mm-hmm.

11 Q. That suggests that the person only spent -- what is
12 that -- about 47 seconds reviewing this before he has to
13 completely sign everything?

14 A. That's what it looks like, yes.

15 Q. Right?

16 In fact, whatever he had to do he did in 47 seconds;
17 right?

18 A. That's what it looks like, yeah.

19 Q. And this was for the PPP application; is that right?

20 A. I can't tell --

21 Q. Let me --

22 A. -- right now.

23 Q. This is a DocuSign that recorded Mr. Wade signing the PPP
24 application; right?

25 A. Yes, I believe so.

1 Q. And he signed all of those spaces in 47 seconds?

2 A. I mean, based off of this data, I think that looks
3 correct.

4 Q. I want to show you 158. I think it's a similar thing. A
5 PPP application; right?

6 A. Yeah.

7 Q. This is the report showing when the PPP application was
8 signed; is that right?

9 A. Yeah. I'm not sure if this is for the application or if
10 this is for the -- for the promissory note. I can't actually
11 tell based off of the information here.

12 Q. Okay. Well, it said that it was delivered at 10:06:41 and
13 the signing was complete -- sorry -- 10:05:41 --

14 A. Yeah.

15 Q. -- and the signing was completed at 10:06:04; is that
16 right?

17 A. That's what it looks like based off of what is written
18 here.

19 Q. That's a short period of time too. That's about
20 23 seconds; right?

21 A. If your math is correct, which I think it is.

22 Q. I mean, it's 10:05:41 --

23 A. Yeah, that looks right.

24 Q. -- to 10:06:04, that's about 23 seconds; right?

25 A. Yeah.

1 Q. So that would suggest that somebody just got the form and
2 just initialled and just went through the thing and just
3 initialed it; right? That doesn't suggest that somebody spent
4 a long time looking at the form. Would you disagree?

5 A. I mean, based off of the data that I see, that appears to
6 be true.

7 Q. Okay. And 159 -- Exhibit 159, the same type of record.
8 The promissory note --

9 A. Yeah, it's the promissory note for this one.

10 Q. And this has "delivered at 9:31:51," and the signing was
11 complete at 9:33:03.

12 A. Okay.

13 Q. That's about one minute and 12 seconds?

14 A. Yes.

15 Q. Now, with respect to the information in the Womply portal,
16 can you determine from the information in your system whose IP
17 address uploaded all the documents associated with the Tracy
18 Wade and Carolyn Wade PPP applications?

19 A. I believe that Mr. Snider showed that information prior,
20 yes.

21 Q. That was on the Excel spreadsheet?

22 A. Yeah, yeah, there's a spreadsheet. I can't remember. I
23 believe it was 164 or something, without the E, and it showed
24 the events, and the events showed the time stamp that the
25 documents were uploaded.

1 Q. Right.

2 And if I recall, there were several events, and there
3 were also several IP addresses.

4 A. Yes.

5 Q. So one event may have -- the IP address that started the
6 process may have been different from the IP address that
7 uploaded the Schedule C; correct?

8 A. I don't have the IP addresses memorized, but presumably
9 they can be different.

10 Q. One second. Could I -- I'm sorry, Your Honor. I'm not
11 going to be long.

12 Can I get the Government to put up 162E -- do you
13 have it? Can I get you to put up 162E, please?

14 THE COURT: Ladies and gentlemen, let's take our
15 afternoon break so you all can get organized.

16 MR. WILCOX: I'm sorry, Judge.

17 THE COURT: Ladies and gentlemen, I've just been
18 informed that the federal courthouse is closed on Thursday as
19 well. So we have no choice but not to be in session on
20 Wednesday, Thursday, and Friday of this week.

21 A JUROR: And Monday of next week.

22 THE COURT: And Monday. So I have no words.

23 MR. SNIDER: Your Honor, what time can we go to till
24 today?

25 THE COURT: What is it that you're requesting?

1 MR. SNIDER: As late as the Court is allowed -- we
2 would like to go today as late as the Court will allow -- and
3 the jury.

4 THE COURT: Well, is there a witness issue? Is it
5 involving --

6 MR. SNIDER: Yes.

7 THE COURT: -- this witness or --

8 MR. SNIDER: No, I'm talking about an additional
9 witness -- I'm just talking about being in session.

10 MR. MCCRAY: Can we have this discussion outside the
11 presence of the jury?

12 THE COURT: Okay. Let's have our break and we will
13 recess for about 15 minutes and then we'll get started and
14 continue at least until 4:00. But you know I've already
15 announced that we end at 4:00 daily, so -- all right, ladies
16 and gentlemen, we are in recess.

17 (Jury exited at 2:58 PM.)

18 THE COURT: Be seated, please.

19 MR. SNIDER: Here's what I'm requesting. We have a
20 witness who has flown here from California. If she doesn't
21 testify today, she would have to go back to California and
22 come back.

23 THE COURT: How long is her testimony going to be?

24 MR. SNIDER: Her testimony is going to be, on
25 direct -- I think I can get it done in 30 minutes.

1 THE COURT: All right. So why don't we interrupt the
2 testimony of this witness and continue with --

3 MR. SNIDER: This witness is also from California,
4 and he has a flight tonight.

5 THE WITNESS: Yeah, at 5:45.

6 MR. SNIDER: I don't know how much longer Mr. Wilcox
7 has.

8 THE COURT: Mr. Wilcox, any idea how much longer your
9 cross will be?

10 MR. WILCOX: I'm not sure, Judge. I don't think I
11 have much longer to go.

12 THE COURT: What does that mean? Like ten minutes?
13 Or 30 minutes? Or? I'm just trying to get some idea.

14 MR. WILCOX: Your Honor, maybe 10 or 15 minutes.

15 THE COURT: All right. And your witness is going to
16 be 30 minutes.

17 MR. SNIDER: Yes.

18 MR. MCCRAY: We'll be pressing it, Judge.

19 THE COURT: I'm sorry. Did someone --

20 MR. MCCRAY: Sorry, Judge.

21 THE COURT: Well, let's see what we can do. I mean,
22 we could try. If it's only 10 and 30, then, you know, maybe
23 we can ask the jury to stay a little longer, but it seems to
24 me the worse day, I thought, for South Florida was tomorrow,
25 but I'm not even sure why we're not in session Thursday, at

1 least based on weather reports thus far, but that's the
2 decision. So maybe something has changed. I'm not sure.

3 MR. WILCOX: It is a big hurricane.

4 THE COURT: Well, that much we know, okay.

5 MR. SNIDER: Your Honor --

6 THE COURT: Let's just see how we can do.

7 MR. SNIDER: If the Court would be willing to make
8 that ask of the jury to stay perhaps a little bit past 4:00
9 today.

10 THE COURT: We can stay a little past 4:00. That's
11 not a problem. The question is how much past 4:00. So let's
12 all be mindful and let's see what we can do to get through to
13 get your witness in and off.

14 MR. SNIDER: If this witness from California will
15 finish, the next witness from California --

16 THE COURT: Yes, I understand. Let's see if -- I'll
17 cut the break a little short, and let's see if we can get
18 everything done by 4:15.

19 MR. SNIDER: All right.

20 THE COURT: Thank you.

21 MR. SNIDER: Thanks, Judge.

22 (Recess at 3:02 PM to 3:19 PM.)

23 (Jury entered at 3:19 PM.)

24 THE COURT: A question, ladies and gentlemen. So you
25 have been advised that we would end each day at -- you've been

1 advised that we would end each day at 4:00 PM. So we're
2 having a little bit of a scheduling problem, and I'm wondering
3 if anyone has scheduled something like anticipating picking up
4 the kids at 4:30 or something like that because I'm
5 considering staying a little bit later than 4:00, if that
6 works for you all. Would that be fine if we go beyond.

7 A JUROR: 4:30?

8 THE COURT: I think that's the max, I hope. This
9 witness is from California and the next witness is from
10 California. So we're trying to finish with those two and then
11 recess. So let's see how we do. Please continue.

12 MR. WILCOX: Thank you, Your Honor.

13 BY MR. WILCOX:

14 Q. Mr. Thakral, remember I was asking you earlier about
15 Mr. Wade's DocuSign notice for his PPP application?

16 A. Okay.

17 Q. This is for Carolyn Wade's -- if I can get the ELM0
18 working -- this is Carolyn Wade's -- similar to the documents
19 that we discussed concerning Tracy Wade. And you can see that
20 this is a --

21 A. Yeah.

22 Q. -- "please sign the PPP origination application PDF
23 below." Okay. It was delivered on May 18, 2021, and at
24 7:54:41. The signing was completed at 7:56:24 and -- I
25 haven't done the math on that, but it looks like it's less

1 than two minutes; is that correct?

2 A. That's what it looks like.

3 Q. Right.

4 So she completed the whole signing of this in less
5 than two minutes; correct?

6 A. That's what it looks like.

7 MR. SNIDER: Can we have the HDMI from Government's
8 table?

9 MR. WILCOX: Thank you, Government.

10 BY MR. WILCOX:

11 Q. First of all, could you just refresh my recollection as to
12 how this Excel sheet was prepared?

13 A. So the one on the screen right now --

14 Q. Yes, sir.

15 A. So this appears to be an export from our database where we
16 identify all of the transactions that are associated with the
17 application ID ending in Charlie, Bravo, eight, Bravo.

18 Q. Let me ask you, did you produce this spreadsheet or did
19 the Government produce it?

20 A. This was -- I believe this was done by a query that I
21 wrote to generate this data -- I can't recall if I wrote it,
22 but I'm definitely capable of writing this.

23 Q. Okay. Well, I'm trying to determine how do we know that
24 it's accurate?

25 A. Oh, this is definitely data from our database. I can tell

1 by looking at it.

2 Q. That's all I wanted to know. Good.

3 Now, I want to direct your attention to the IP
4 address. Do you see the first two transactions or the first
5 two activities you have an IP address ending in 166?

6 A. Yes.

7 Q. Do you see that?

8 A. Yes.

9 Q. And then -- excuse me?

10 A. Yes. That's correct.

11 Q. Okay. And then you have a few IP addresses ending in
12 229 -- is that 4 or 5? And then you have some ending in 36.
13 Then you have, like, ten entries or -- coming from IP address
14 125.

15 A. That seems to be generally correct.

16 Q. Okay. And you don't know the identities of any of
17 these -- you don't know the identity of the persons to whom
18 these IP addresses are assigned?

19 A. I do not.

20 MR. WILCOX: Okay. One second, Your Honor.

21 Your Honor, no further questions.

22 THE COURT: All right.

23 MR. WILCOX: No, no, one question, Judge. I'm sorry,
24 one more.

25 BY MR. WILCOX:

1 Q. Now, can we say that all these people -- these -- with the
2 IP addresses, they are users? Would that be fair to identify
3 these people as users?

4 A. Well, no, this is all the same user -- because the user ID
5 for all these transactions is the same. It's the same user in
6 terms of the system point of view, but these are just
7 different devices that were used by this user.

8 Q. Well, how can you say that -- I mean, when you say the
9 same user, you mean the same individual?

10 A. No. When I say -- user here is defined as the user
11 identifier. So the information that they were using to log in
12 belonged to a particular identifier within our system. So the
13 email and phone number.

14 Q. And that's what I was getting at. Even though these IP
15 addresses -- someone else other than Tracy Wade could be --

16 A. It could be or it could not be. I can't tell.

17 Q. I understand that. Just let me finish.

18 A. Sorry.

19 Q. Even though someone else may have been using an IP address
20 ending in 299, it would still show up as coming to Tracy
21 Wade's email; is that right?

22 A. Yes, it would be associated with the user ID.

23 Q. Right.

24 It would still be associated with Tracy Wade's email
25 even though -- even if someone else was actually inputting the

1 information?

2 A. Yes, correct.

3 MR. WILCOX: All right. Thank you very much.

4 THE COURT: Yes, sir.

5 MR. SNIDER: I have a few redirect questions. May I
6 ask them from here?

7 THE COURT: Yes, sir.

8 REDIRECT EXAMINATION

9 BY MR. SNIDER:

10 Q. Just so we're clear about the login process, there was no
11 permanent password; correct?

12 A. Correct.

13 Q. So if a one-time code was sent to a cell phone in order to
14 log in, you would have to have access to see the text message
15 received on that cell phone; is that correct?

16 A. Yes, you would either have to either be holding the device
17 and receiving the message or taking the message and forwarding
18 it to some other place, if it was done that way. Those are
19 technically the only two ways to do it.

20 Q. So you can share the code, but the code is sent to a cell
21 phone --

22 A. Correct.

23 Q. -- if it was a cell phone logging in?

24 A. Yeah.

25 Q. And if it was a email logging in, the code would go to

1 email?

2 A. Correct. Both forms are shareable, technically.

3 Q. You can share the code?

4 A. Yeah.

5 Q. Within 15 minutes?

6 A. Yes.

7 Q. Because after that, it expired?

8 A. Correct.

9 Q. And would you need a new code to be generated?

10 MR. MCCRAY: Objection. Leading.

11 THE WITNESS: Correct.

12 THE COURT: I'm sorry. I didn't hear you.

13 MR. MCCRAY: Objection. Leading, Your Honor.

14 BY MR. SNIDER:

15 Q. Would a --

16 THE COURT: Hold on. Let me rule on the objection.

17 Sustained.

18 BY MR. SNIDER:

19 Q. Would a new code need to be generated if the code that had
20 been first sent, if more than 15 minutes had lapsed?

21 A. Yes. Whatever the time limit was for the verification
22 code. It was short-lived. I can't remember the exact number
23 or the exact parameter that we used, but 15 minutes is a
24 reasonable estimate of that. So, yes, if it was longer than
25 15 minutes, you would need a new code.

1 Q. Okay. And, Mr. Thakral, you were asked some questions
2 during cross-examination about the time in which these PPP
3 loan applications were sent to the applicant and viewed and
4 signed; correct?

5 A. Yes.

6 Q. And you were asked some questions about the time that had
7 elapsed between the viewing and the signing; correct?

8 A. Yes.

9 Q. And in some of those instances, it appeared to you that
10 those time windows were short?

11 A. Yes.

12 Q. The information that's in these 2483-C applications that
13 we've looked at today -- and you're looking at an example
14 right now of 159.

15 A. Okay.

16 Q. -- was this information previously put into Womply's
17 website before it went into this document?

18 A. Yes.

19 Q. So if a user was signing this, this would not be the first
20 time they would have seen this information if they had logged
21 in before?

22 MR. WILCOX: Objection, Judge. That calls for
23 speculation.

24 THE COURT: Rephrase your question, please, so that
25 it's not leading.

1 BY MR. SNIDER:

2 Q. If a user had previously logged in to Womply's website
3 prior to the signing of the DocuSign 2483-C, would that person
4 have seen the information that's in the document?

5 A. Yes. It's the information that they entered originally.

6 Q. So there was an opportunity to see it before it was
7 actually signed?

8 A. Yes.

9 Q. And do you know whether it was possible to see the
10 information again after it was signed?

11 A. I believe so. We had a -- we had a status-checking
12 functionality, and you could check the status of an
13 application, and that included a review of the details that
14 you provided.

15 MR. SNIDER: No further questions.

16 THE COURT: Permanent excusal, gentlemen?

17 MR. MCCRAY: Yes.

18 MR. SNIDER: Yes.

19 THE COURT: You are excused.

20 Please get your next witness in as quickly as
21 possible.

22 MR. SNIDER: Yes, Your Honor. I'm going to take the
23 podium again, if that's okay.

24 MR. MCCRAY: Judge, can we approach just for a
25 second --

1 THE COURT: Quickly, please.

2 MR. MCCRAY: -- to bring something to the Court's
3 attention.

4 (The following proceedings were held sidebar:)

5 MR. MCCRAY: Judge, this is Johnny McCray speaking.
6 I want to bring to the Court's attention -- and I don't have
7 the jurors' name. I should have brought my little roster with
8 me -- yes. Judge, it appears that Juror Number 5,
9 Mr. Schaffer and the lady next to him in the black,
10 Number 4 --

11 THE COURT: Did you say Mr. Schaffer?

12 MR. MCCRAY: Yes, and Ms. Infante, Judge, they're
13 talking during the testimony. They're making faces. When
14 things are being said, they appear to be collaborating with
15 each other.

16 THE COURT: Collaborating meaning?

17 MR. MCCRAY: They're talking.

18 THE COURT: Communicating with one another?

19 MR. MCCRAY: Yes, communicating with one another,
20 Judge. It was going on during Mr. Wilcox's questioning. It
21 was going on just a few seconds ago. I don't want to single
22 anybody out in their presence, but maybe if the Court could
23 instruct.

24 THE COURT: What would you recommend? Well, there
25 are two ways. I can watch and the first time it occurs I can

1 say something or --

2 MR. MCCRAY: We can do it that way.

3 THE COURT: -- or I can do something now.

4 MR. MCCRAY: I like the first suggestion, Judge.

5 THE COURT: All right. Let's see how this will go.

6 (The following proceedings were held in open court:)

7 (Government witness, LINDSEY BERGH, duly sworn.)

8 THE COURTROOM DEPUTY: Please have a seat.

9 State your name for the record and spell it, please.

10 THE WITNESS: My name is Lindsey Bergh,

11 L-I-N-D-S-E-Y, B-E-R-G-H.

12 DIRECT EXAMINATION

13 BY MR. SNIDER:

14 Q. Good afternoon, Ms. Bergh.

15 A. Afternoon.

16 Q. How are you?

17 A. I'm good. How are you?

18 Q. I'm well. Thank you.

19 Can you please tell the jury where you work?

20 A. Yes. I work at Persona Identities, which is an identity
21 verification company --

22 THE COURT: Can you move the microphone? You have to
23 lean into the microphone and speak directly into it, please.

24 THE WITNESS: Yeah.

25 BY MR. SNIDER:

1 Q. We'll just say it so that the court reporter is able to
2 keep pace with you so he can take down everything you're
3 saying.

4 You said you work at Persona?

5 A. Persona Identities, yes.

6 Q. What is Persona Identities?

7 A. Persona performs identity verification services for our
8 customers who are looking to verify their end users'
9 identities.

10 Q. How long have you worked for Persona?

11 A. I've been there for about three years and 10 months now.

12 Q. Do you have a position there?

13 A. I do.

14 Q. What is it?

15 A. I'm the head of customer success.

16 Q. What do you do as the head of customer success?

17 A. On the customer success team, we work with our customers
18 and help them to use our software to verify their end users
19 for different use cases, whether signing up for a bank account
20 or signing up to be a DoorDasher or different things like
21 that.

22 Q. Are you appearing here today on behalf of Persona?

23 A. Yes, I am.

24 Q. In your role and experience, being there over three years,
25 are you familiar with Persona's systems and the records that

1 they keep?

2 A. Yes, I am.

3 Q. And are you familiar with the identity verification
4 process that Persona provides to its customers?

5 A. Yes, I am.

6 Q. What kind of customers does -- I think you maybe just
7 named a few, but, generally, tell the jury what kinds of
8 customers use Persona's services.

9 A. We work with customers across a number of different use
10 cases. Like I mentioned, it would be a bank looking to
11 provide a bank account or a credit or debit card, for example,
12 for their end users. It can also be companies like DoorDash
13 who want to either sell alcohol online to an end user and
14 needs to make sure they're 21 years old. So we work across a
15 number of different types of customers and industries.

16 Q. So given that there are so many different customers and
17 industries, does Persona do anything to tailor identity
18 verification for one customer versus another?

19 A. Yes. We provide a number of different types of
20 verifications that our customers can use, and we then work
21 with them to build out a process that helps them achieve what
22 they need to verify for their end users.

23 Q. Are you familiar with a company called Womply?

24 A. Yes, I am.

25 Q. Was Womply one of Persona's customers?

1 A. Yes. Womply worked with us back in -- around 2021 as our
2 customer.

3 Q. And specifically, what were you doing for Womply in 2021
4 as far as identity verification services?

5 A. We helped Womply to verify applicants who were going
6 through and applying for PPP loans. They used Persona to
7 verify the identity of those end users.

8 Q. Are you familiar with the term software development kit or
9 SDK?

10 A. Yes. A software development kit allows a website or an
11 application to embed a different piece of software into their
12 own site or app.

13 Q. And is that how it was done for Womply with respect to
14 Persona's service?

15 A. Yes. Womply embedded the Persona flow within their site
16 using our web SDK.

17 Q. You use the term "use cases." What did you mean by that?

18 A. Yeah. A use case is a purpose for which a customer of
19 ours -- of Persona's -- needs to verify their end user. So,
20 for example, a common use case is onboarding or applications.
21 During the process of onboarding or applying for a specific
22 service, we would help, again, a customer verify their end
23 user's identity and that would be one specific use case.

24 Q. And was the verification in connection with the Paycheck
25 Protection Program a use case for Womply or for Persona as the

1 use?

2 A. Yes, it was.

3 Q. And Womply actually did do identity verifications for
4 people that were applying for PPP loans through Womply?

5 A. Yes, that's right. And they used Persona to do so
6 specifically.

7 Q. And did Persona keep records of those identity
8 verification checks?

9 A. We did, yes.

10 Q. Are you familiar with those records?

11 A. I am, yes.

12 Q. I'm going to publish for you what is in evidence as
13 Government Exhibit 156.

14 And if we could have the HDMI from the podium
15 displayed. Great. Thank you.

16 Do you see 156 on your screen, Ms. Bergh?

17 A. I do, yes.

18 Q. And do you recognize this kind of record?

19 A. Yes, I do.

20 Q. Tell us about it.

21 A. This is what's called an inquiry. An inquiry represents a
22 single instance of an end user attempting to verify their
23 identity.

24 Q. And can you tell from this page who the user was whose
25 identity was being verified?

BERGH - DIRECT

178

1 A. Yes. It was Tracy D. Wade.

2 Q. And do you see a birth date?

3 A. I do.

4 Q. And an address?

5 A. Yes.

6 Q. It appears there's a Government ID number?

7 A. Yes. Correct.

8 Q. And this is in a section that's titled attributes?

9 A. Yes.

10 Q. Where is this coming from, this information displayed
11 here?

12 A. This is information that was submitted by the user and
13 extracted from their Government ID.

14 Q. We're going to walk through. Does this record have
15 multiple pages?

16 A. Yes, it does.

17 Q. All right. Now we're on the second page of
18 Government 156. What is displayed here?

19 A. This indicates the type of Government ID that the users
20 submitted, DL means driver's license; the country from which
21 the Government ID was issued, the United States; and the
22 social security number that the end user entered.

23 Q. Okay. Now we're on page 3. Do you see where it says
24 "selfies"?

25 A. Yes.

1 Q. And what do you see there?

2 A. That is the portrait from the individual's Government ID.

3 Q. Was there a component for Womply's verification that was
4 done by Persona that involved a selfie?

5 A. Yes.

6 Q. Can you explain that process?

7 A. Yes. An end user after submitting their information and
8 their Government ID image are also asked to submit an image of
9 their face. This is used to compare the face against the
10 Government ID portrait to ensure the Government ID belongs to
11 the person going through the inquiry.

12 Q. We're now on page 4. And do you see where it says
13 "inquiry" at the top and there's a bunch of characters below
14 that?

15 A. Yes.

16 Q. What did those characters represent?

17 A. That is an inquiry ID. It's a unique identifier that we
18 create to identify a specific inquiry, which again is a single
19 instance of a person verifying themselves.

20 Q. Okay. So this is the single instance of the verification
21 for Tracy Wade, and the way that Persona identifies that is
22 the end characters VGVQ?

23 A. Yes, that's right.

24 Q. Tell us the about the top of the page where it says
25 "verifications" and then the number four.

1 A. Yes. This indicates that the person who went through this
2 inquiry had to submit several different types of
3 verifications. They had to submit a database verification,
4 their Government ID, and a selfie. There are four total
5 because they went through two attempts for selfie. The first
6 did not pass and the second did pass.

7 Q. Okay. And do you see where it says "sessions"?

8 A. Yes.

9 Q. And then there's a bunch of sessions that are listed with
10 some other identifying characters. Do you see that?

11 A. Yes, I do.

12 Q. What are the sessions?

13 A. A session is a single instance of someone interacting with
14 the actual screens that they're being shown on their device.
15 So one session would be you're interacting with the flow. You
16 can imagine you might leave, come back later. That would
17 represent two sessions, for example.

18 Q. So could you start the identity verification but not
19 complete it in the same session?

20 A. Yes. Correct.

21 Q. And does that appear what happened here?

22 A. Yes.

23 Q. I'm sorry. I should say it appears that that's what
24 happened here?

25 A. Yes, that's right.

1 Q. Let's go to the next page. We're on page 5 of Government
2 Exhibit 156. What is displayed on this page?

3 A. This is the information that the individual submitted as
4 part of the database verification.

5 Q. And can you tell from looking at this whether the database
6 verification component of this identity check was successful?

7 A. Yes. It was passed, which is indicated in the upper
8 right-hand corner in the green box.

9 Q. Okay. And then once you completed this, did you have to
10 go to the next component of the verification?

11 A. Yes, that's right.

12 Q. Now, I'm on page 6. What do we see here on page 6 of
13 Government Exhibit 156?

14 A. This is the selfie that the individual was asked to go
15 through.

16 Q. Okay. And how many photographs did the individual take?

17 A. They submitted three. Users have to submit a center pose,
18 look left, and then look right.

19 Q. Okay. And can you tell from this page of the inquiry
20 report whether this selfie check was successful?

21 A. It was not. They needed to retry it because they didn't
22 get the poses quite right. You can see they sort of looked
23 right, right, and then left, instead of center, left, right.

24 Q. Were the settings for this identity verification set or
25 requested by Womply?

1 A. Yes, that's correct.

2 Q. And did Womply allow its customers, if the first selfie
3 didn't work, to try again?

4 A. They did.

5 Q. What is on page 7 of Government 156?

6 A. This is another selfie verification, this time successful.

7 Q. And for this second try, were additional photographs
8 taken?

9 A. Yes. They took three new photographs. Again, a center,
10 left, and right pose.

11 Q. I'm now on page 8 of Government 156. What do we have in
12 this part of the verification?

13 A. This includes an image of the front and back of the
14 Government ID that the user submitted as well as the data that
15 we were able to extract or pull off of the gov ID image.

16 Q. So part of the verification inquiry and process that a
17 Womply applicant would go through was to upload a photograph
18 of their front and back of their ID?

19 A. That's right, yes.

20 Q. And was this part of the verification successful?

21 A. It was. It passed.

22 Q. We're now on page 9 of Government 156. What's displayed
23 there?

24 A. These are what are called verification checks. A
25 Government ID verification works by running a number of

1 different checks, things like checking to see if the gov ID is
2 expired, if there's a portrait present on the ID. And the
3 customer gets to determine which checks are required, which
4 checks are not required.

5 In this case, all of the required checks and the
6 nonrequired checks passed.

7 Q. Okay. We're now on page 10. What part of the
8 verification process was this?

9 A. This is what is called the Watchlist Report. A Watchlist
10 Report is used by many financial institutions to check that an
11 individual is not on any OFAC or sanctions lists such that
12 they're able to transact with them.

13 Q. Okay. What's OFAC?

14 A. OFAC is the Office of Financial Assets and Controls.

15 Q. We're now on page 11, and the title on this page is
16 session. What kind of information are we looking at on
17 page 11 of this inquiry report?

18 A. This includes information about the device and network
19 that the user was associated with during this session of their
20 inquiry.

21 Q. And in this inquiry, were there multiple sessions?

22 A. Yes, there were.

23 Q. And is this the first one?

24 A. Yes. Correct.

25 Q. Can you tell from looking at this page, is there any time

1 stamp on this page?

2 A. This page does not include the time stamp.

3 Q. Is that located on another record?

4 A. It should be, yes.

5 Q. Is there a place where Persona kept more detailed
6 information about the sessions?

7 A. Yes.

8 Q. Okay. But you can tell from this page what IP address was
9 used for this session?

10 A. That's right.

11 Q. What IP address is that?

12 A. 761.101.831.25.

13 Q. And what type of device is used in this session?

14 A. They were on an iPhone.

15 Q. We're now on page 13. Is this the next session?

16 A. That's right.

17 Q. And what is the IP address that was used for this session?

18 A. This IP address is 174.228.132.36.

19 Q. Is this session number two?

20 A. It should be, yes.

21 Q. Okay. Because they go in order?

22 A. Yes. Correct.

23 Q. And can you tell from this the type of phone or model of
24 the device that was used in this session?

25 A. Yes. They were on a Samsung Android.

1 Q. And is that part of Persona's recordkeeping, to capture
2 both the IP address and the type of device that was being used
3 for the verification?

4 A. Yes, that's right.

5 Q. Identity verification.

6 We're now on page 14. And just for the record, the
7 session identified on page 13 ends in 6XT and the session that
8 is on page 14 ends in LLH. Did I get that right?

9 A. Yes.

10 Q. So for this session, I believe -- we're on the third -- is
11 it the same IP address, ending in 36, as we saw in the
12 previous page? I can go back, if you need to.

13 A. Yes, it's the same as in session two.

14 Q. And is the phone the same?

15 A. Yes.

16 Q. Now we're in a session ending in 870P, which is page 15 of
17 Government 156. Is the IP address the same --

18 A. Yes, it is.

19 Q. -- ending in 36?

20 A. Yes.

21 Q. Is the type of phone that was used for this session the
22 same?

23 A. Yes, it is.

24 Q. I'm on page 16 and the session ID ends ZL8. Do you see
25 that?

BERGH - DIRECT

186

1 A. Yes.

2 Q. Is the IP address the same --

3 A. It is.

4 Q. -- as the previous session?

5 A. Correct.

6 Q. And is the cell phone the same?

7 A. Yes.

8 Q. Now I'm looking on page 17 and I see a session ID ending
9 in FED. Do you see that?

10 A. Yes.

11 Q. Is the IP address the same, ending in 36?

12 A. Yes, it is.

13 Q. And is the device the same?

14 A. Yes, it is.

15 Q. Now I'm on page 18. The session ID ends in PL0R. Do you
16 see that?

17 A. Yes.

18 Q. The same IP --

19 A. Correct.

20 Q. -- ending in 36?

21 A. Yes.

22 Q. And the same device?

23 A. Yeah.

24 Q. The Samsung SM-G998U?

25 A. Yes.

1 Q. You said there was a document that had more detail about
2 the sessions; correct?

3 A. Yes.

4 Q. All right. With the time stamps?

5 A. Yes.

6 Q. So what I'm going to do is I'm going to show you two
7 documents at the same time. I'm going to put on the left side
8 of your screen Government Exhibit 156.1, and I'm going to put
9 on the right side of your screen 156.2, which are both in
10 evidence. Do you see that?

11 A. Yes, I do.

12 Q. Let me ask you this. With respect to the IP address, can
13 Persona infer where that location of that IP is coming from?

14 A. We can infer longitude and latitude from the IP address,
15 but it's not as precise as GPS location, which we do not use.

16 Q. And why is it not as precise?

17 A. It's related to the fact that, especially when you're on
18 mobile devices, the IP address can change, and it's based on
19 the specific cell tower or server that the device connected to
20 in order to get access to either data or the Internet.

21 Q. You said the word "server." So, for example, if you were
22 on a network in Florida but the server was in New York, would
23 Persona show that IP as being in New York?

24 A. That would be correct, yes.

25 Q. And so we're looking now at Government Exhibit 156.1. And

1 do you see a date and time associated with session one?

2 A. Yes, I do.

3 Q. What is that date and time?

4 A. It's May 6 at 2:54 AM.

5 Q. Okay. And the time zone, if you know, for the records
6 that we're looking at in Government 156.1, do you know what
7 zone that is?

8 A. I believe it was GMT.

9 Q. Is that like UTC?

10 A. UTC, yes.

11 Q. Universal time coordinated?

12 A. Yeah.

13 Q. Now, looking at this first page, 156.1, let's now look at
14 156.2. Do you recognize 156.2?

15 A. Yes, I do.

16 Q. What is in 156.2?

17 A. This shows records of the verifications that were
18 submitted during the inquiry.

19 Q. Okay. So are you able, based on the time stamps, to
20 determine what happened in session 2, 3, 4, 5, 6, 7, 8, so on
21 and so forth versus -- and what happened, if anything, in
22 session one?

23 A. Yes.

24 Q. So what, if anything, can you tell happened in session
25 one, looking at these two documents?

1 A. So based on the time stamp of this first verification at
2 7:34 PM, it looks like no verifications were submitted during
3 session one.

4 Q. No verifications.

5 And so if we look down here on page 2 of
6 Government 156.1, is this more detail for session one?

7 A. Yes, it is.

8 Q. So you're saying that this session where the IP ends in
9 125, there was no actual verification done?

10 A. Correct.

11 Q. And that was using the iPhone?

12 A. Correct.

13 Q. Now, there's some additional sessions, 2 through 8, but it
14 doesn't appear that it is expanded; is that right?

15 A. That's right.

16 Q. Is it possible on your systems to expand it?

17 A. Yes, it is.

18 Q. But the manner in which this was presented to the
19 Government, it wasn't expanded; is that right?

20 A. That's correct.

21 Q. Okay. Notwithstanding that it's not expanded, let's go
22 back and look at page 1 where these time stamps are. Can you
23 look at Government 156.2 on the right side of your screen and
24 tell me, if you can -- well, let's look at what happens first.
25 Tell me what happens first as far as the verification.

1 A. Yeah. So this database verification was submitted at
2 7:34 PM, which lines up with session three.

3 Q. Okay. Lines up with session three.

4 And session three was one of the ones we looked at on
5 the other exhibit, 156, that was an Android phone?

6 A. Yes, correct.

7 Q. In fact, all the sessions that you looked at, two through
8 eight, those were all the Android phone?

9 A. Correct.

10 Q. And those were all with the IP address ending in 36 --

11 A. That's right.

12 Q. -- starting with 174.

13 That was the database verification. Then what
14 happened next in the verification for this person?

15 A. Next, they attempted the selfie verification for the first
16 time at 7:35 PM, which also lines up with session three.

17 Q. Okay. Scrolling down to pages 3 and 4 of
18 Government 156.2. What happened next?

19 A. The next verification is the selfie verification that
20 passed. That was at 7:38 PM, which lines up with session
21 four.

22 Q. Okay. Can you tell me what happened next and what session
23 it was?

24 A. Yes. The next verification was their Government ID. That
25 was at 7:49 PM, which lines up with session eight.

1 Q. And is that the last session for this identity inquiry?

2 A. That's right, yes.

3 Q. And this was for the person of what name?

4 A. Tracy Wade.

5 Q. Okay. Ms. Bergh, I'm now publishing Government 114 in
6 evidence. Do you see that?

7 A. I do, yes.

8 Q. This looks like a similar report but for a different
9 person; is that right?

10 A. That's correct.

11 Q. What is the unique inquiry of the characters, the last
12 four that it ends with for this report?

13 A. This one is BEKB.

14 Q. And who was this an identity verification for?

15 A. For Carolyn Wade.

16 Q. And the information that I've expanded on Government 114,
17 where was this information coming from?

18 A. Similar to the previous. This includes information that
19 the individual submitted when they were going through the flow
20 either by entering it or based on their Government ID.

21 Q. Okay. We're now on page 2 of Government 114. And what's
22 on this page?

23 A. This includes the type of Government ID that they
24 submitted. DL, again, means driver's license; the country,
25 United States; and their social security number.

1 Q. Okay. We're now on page 3 of Government 114. What is on
2 this page?

3 A. This includes images of the Government ID that they
4 submitted as well as the portrait from their Government ID.

5 Q. We're on page 4 of Government 114. What do you see here?
6 Let's start with the section where it says "verifications" and
7 then six. What does that mean?

8 A. Yeah. This means that they submitted six verification
9 attempts, one database, one selfie, and then four failed
10 Government ID attempts.

11 Q. Can you pass the overall identity verification if the
12 Government ID component fails?

13 A. You cannot.

14 Q. Can you try multiple times?

15 A. Yes, you can.

16 Q. How many sessions were associated with this particular
17 identity verification inquiry?

18 A. This one includes seven.

19 Q. Did the database check component of this verification
20 pass?

21 A. Yes, it did.

22 Q. The first selfie component here, did that appear to have
23 passed?

24 A. Yes, it did.

25 Q. What happened here? I'm now on page 7 of Government 114.

1 A. This attempt for the user to submit their Government ID
2 failed, likely because of the glare that you can see in the
3 image on the right.

4 Q. Okay. And now I'm on page 8 of Government 114. Does this
5 provide reasons why the first attempt at the Government ID
6 verification failed?

7 A. Yes, it does. They failed several of the required
8 verification checks.

9 Q. Is it fair to say that this was a pretty involved identity
10 verification?

11 MR. WILCOX: Objection to leading.

12 THE COURT: Overruled.

13 THE WITNESS: It included many steps. You can see,
14 again, they had to go through database selfie, and they went
15 through four gov ID attempts.

16 BY MR. SNIDER:

17 Q. I think we're on page 9. Is this another Government ID
18 attempt to verify?

19 A. This is the second attempt, yes.

20 Q. Did the second attempt work?

21 A. This one also failed.

22 Q. I'm now on page 10 of Government 114. Does this have the
23 explanation of why it failed?

24 A. Yes, it does.

25 Q. And what was that reason?

1 A. It failed because we were not able to extract information
2 out of the barcode correctly on the back of the ID.

3 Q. Now I'm on page 11 of Government 114. What happened here?

4 A. This is the third gov ID attempt that also failed.

5 Q. And on page 12 of Government 114, what was the reason that
6 it failed?

7 A. It also failed because we were not able to extract the
8 information we needed from the barcode.

9 Q. Now I'm on page 13 of Government 114. What's on this
10 page?

11 A. This is the fourth attempt for the gov ID verification
12 that also failed.

13 Q. And, again, what was the problem?

14 A. Similarly here, we were not able to extract the
15 information we needed from the barcode.

16 THE COURT: Just for your information, it's 4:02.

17 MR. SNIDER: Thank you, Judge.

18 And we're ending at 4:30; correct?

19 THE COURT: Well, if you want the witness to be able
20 to leave, we have to finish with cross and redirect.

21 MR. SNIDER: Got it.

22 BY MR. SNIDER:

23 Q. All right. Was this first inquiry successful?

24 A. It was not.

25 Q. And is there a limit to how many times you can try per

1 inquiry before it fails?

2 A. They -- they, meaning Womply, had it configured such that
3 the user had four tries for gov ID. Once they tried those
4 four tries, they failed the inquiry.

5 Q. So Carolyn Wade tried four times and as a result the
6 inquiry failed?

7 A. Correct.

8 Q. For purposes of expediency, I'm -- let me just ask. Does
9 this document have information about all the sessions that we
10 just looked at?

11 A. It does, yes.

12 Q. Okay. And similar to the document we looked at a moment
13 ago, is there a separate record that has some more detail
14 about those sessions?

15 A. There is, yes.

16 Q. I'm going to pull that up, which is Government
17 Exhibit 114.1.

18 Do you see 114.1 on your screen?

19 A. I do, yes.

20 Q. And is this the document that provides additional detail
21 about the seven sessions that we just looked at?

22 A. Yes, that's correct.

23 Q. And does this one appear to have that additional
24 information expanded?

25 A. Yes. That's right.

1 Q. Okay. So can you tell, for example, from the first
2 session what was the IP address?

3 A. The IP address for the first session ends in 166.

4 Q. Okay. And can you tell the type of device that was used
5 in that first session?

6 A. This was a Windows desktop.

7 Q. Now we are on session two. Do you see that?

8 A. I do, yes.

9 Q. Now, what was the date and time of session two?

10 A. May 13 at 2:09 PM, and, again, this should be UTC.

11 Q. Okay. And the IP address during this session started with
12 174 and ended in 184?

13 A. Correct.

14 Q. And according to Persona, the server for that IP was
15 located in New York?

16 A. Correct.

17 Q. But that doesn't mean the person was located in New York?

18 A. Correct.

19 Q. Can you tell the type of device that was used for the
20 second session?

21 A. Yes. This was also a Samsung Android device.

22 Q. And what was the -- does it have the model number?

23 A. Yes. SM-N986U.

24 Q. Let's go through this sort of fast. But session three, is
25 that the same IP address that we saw in session two?

BERGH - DIRECT

197

1 A. Yes.

2 Q. And is it the same type of device?

3 A. Yes, it is.

4 Q. Session four, the same IP address?

5 A. Yes. Correct.

6 Q. The same device?

7 A. Yep.

8 Q. Session five, the same IP?

9 A. Yes.

10 Q. The same device?

11 A. Yes.

12 Q. Session six, is that the same IP?

13 A. Yes.

14 Q. Is that the same device?

15 A. Yes.

16 Q. And now, lastly, session seven, the same IP?

17 A. Yes.

18 Q. The same device?

19 A. Yes.

20 Q. Okay. If the whole inquiry failed -- I may have just
21 asked you this -- I'm sorry -- but did Womply have a
22 configuration where you could try the whole thing over again?

23 A. Yes, they did.

24 Q. I'm publishing for you Government Exhibit 115 in evidence.

25 Do you see 115 in evidence?

1 A. Yes, I do.

2 Q. Is this a separate inquiry from the one that we just
3 looked at in 114?

4 A. Yes, it is.

5 Q. Who is it a separate inquiry for?

6 A. Carolyn Wade.

7 Q. And is this the information that the user would have
8 supplied or taken from the Government ID?

9 A. That's correct.

10 Q. I'm now on page 2. What happened, as far, as you can
11 tell, from the information on page 2?

12 A. This also includes the Government ID type that they
13 submitted and the country and their social security number.

14 Q. And page three?

15 A. This includes the portrait from their gov ID.

16 Q. Now we're on page four. What happened, as far as you can
17 tell, with respect to the verifications in this inquiry?

18 A. Yeah. This indicates that they passed database, they
19 passed selfie. And after failing their first gov ID attempt,
20 they passed the second gov ID attempt.

21 Q. And in how many sessions was this one completed?

22 A. This was in one.

23 Q. Was this session after the first one -- this inquiry was
24 after -- later in time than the one we just looked at?

25 A. It would have been, yes.

1 Q. Does page 5 show that the verification for the database
2 was successful?

3 A. It does, yes.

4 Q. What does page 6 show?

5 A. This shows the passed selfie verification.

6 Q. Passed as in it succeeded?

7 A. Correct.

8 Q. Not past as in past time?

9 A. Yes, it was successful.

10 Q. And are these different photographs that had to have been
11 taken?

12 A. Yes. Every time a user submits a verification, they have
13 to submit a new image.

14 Q. What's on page 7 of Government 115?

15 A. This includes the failed gov ID verification attempt.

16 Q. And page 8 has the reason why?

17 A. Yes. It failed because we were not able to compare the
18 selfie to the gov ID properly because the image was a bit
19 blurry.

20 Q. And how about on page 9? What does that show?

21 A. This includes the successful gov ID verification that came
22 next.

23 Q. So ultimately, was this inquiry successful?

24 A. It was, yes.

25 Q. Similar to the records we just looked at for the previous

1 inquiry for Carolyn Wade, was there a record that showed some
2 additional detail for the one session for this inquiry we're
3 looking at in Government 115?

4 A. There is, yes.

5 Q. Okay. I've published for you Government 115.1. Do you
6 see that?

7 A. I do.

8 Q. And is this the additional information for this single
9 session for the second inquiry that was ultimately successful?

10 A. It is, yes.

11 Q. And what was the IP address for this first session on the
12 second try?

13 A. 174.228.361.84.

14 Q. And the device type that was used for this one?

15 A. A Samsung Android SM-N986U.

16 MR. SNIDER: Thank you very much, Ms. Bergh. I have
17 no further questions on direct for you. Thank you.

18 THE COURT: Cross-examination.

19 CROSS-EXAMINATION

20 BY MR. WILCOX:

21 Q. Good afternoon, Ms. Bergh. How are you?

22 A. I'm good. How are you?

23 Q. Now, the fact that Mr. Wade -- it took Mr. Wade several
24 times to complete the verification process, that doesn't
25 suggest any wrongdoing, does it?

1 A. I think it suggested he had a hard time submitting an
2 appropriate image the first few tries.

3 Q. Okay. But that doesn't suggest any criminal behavior in
4 any way, does it?

5 A. I don't think so.

6 Q. Okay. And the same thing with Ms. Wade. The fact that
7 she had -- it took her multiple times to complete the
8 identification verification process, it doesn't suggest any
9 wrongdoing or any criminal behavior, does it?

10 A. Again, I think it just means they had a hard time going
11 through it the first time.

12 Q. And every time that they tried to take a -- every time
13 that they attempted to verify their identity, that would be
14 reflected as a login attempt or there would be a record kept
15 of that with your company?

16 A. That's correct, yes.

17 MR. WILCOX: One moment, Your Honor.

18 I don't have anything else. No further questions.

19 THE COURT: Thank you. Yes, sir.

20 MR. SNIDER: No redirect. The witness may
21 permanently be excused.

22 THE COURT: Permanent excusal, defense?

23 MR. MCCRAY: Yes, Judge.

24 THE COURT: You may be excused.

25 MR. SNIDER: Judge, if we have 15 minutes, I can call

MORROW - DIRECT

202

1 one more witness.

2 MR. WILCOX: No.

3 MR. SNIDER: Sidebar?

4 THE COURT: Is this a local witness?

5 MR. SNIDER: No, he's from Chicago.

6 THE COURT: But 15 minutes, there's no time for
7 cross. That's the problem.

8 MR. SNIDER: Okay.

9 THE COURT: Can you do it in seven minutes? I mean,
10 you have to allow some time for cross. If not, then, you
11 know, we're not going to resume until Tuesday, so...

12 MR. SNIDER: I'll make this brief. I think I can.

13 THE COURT: Let's try, but keep in mind --

14 MR. SNIDER: The United States calls Dion Morrow.

15 (Government witness, DION MORROW, duly sworn.)

16 THE COURTROOM DEPUTY: Please have a seat. State
17 your name and spell it for the record.

18 THE WITNESS: My name is Dion Morrow. The first name
19 is spelled D-I-O-N. The last name, M-O-R-R-O-W.

20 DIRECT EXAMINATION

21 BY MR. SNIDER:

22 Q. Good afternoon, Mr. Morrow.

23 A. Good afternoon.

24 Q. Where are you employed?

25 A. Verizon.

1 Q. How long have you worked there?

2 A. This is my 18th year.

3 Q. What's your position?

4 A. My title is senior analyst, customer service, and business
5 ops support.

6 Q. What do you do in that role?

7 A. One of the things I do is to testify in criminal and civil
8 trials in the event that Verizon's records have been released
9 under court order.

10 Q. Are you familiar with Verizon's records generally?

11 A. Yes, I am.

12 Q. Are you familiar with records that Verizon produced to the
13 United States Government in this case?

14 A. Yes.

15 Q. Did you have a chance to review those records before
16 coming to testify today?

17 A. Yes.

18 Q. Okay. Can you tell the jury the type of services that
19 Verizon provides?

20 A. Verizon is a cellular service provider -- well, in the
21 aspect that I handle, the cellular service, which allows
22 customers to use mobile devices for remote access to the
23 Internet and for phone calls.

24 Q. Okay. And does Verizon keep records of its
25 accountholders?

MORROW - DIRECT

204

1 A. Yes.

2 Q. Does it keep records in some instances of phone calls that
3 were made?

4 A. Yes.

5 Q. And does Verizon have records of -- do you know what an IP
6 address is?

7 A. Yes, I do.

8 Q. How would you describe it in sort of layman's terms to the
9 jury?

10 A. Well, an IP is -- it's like a gateway to the Internet.
11 It's the entranceway that you would -- well, to gain access to
12 data on the Internet. The best way to look at it is sort of
13 like being on a toll road. You pay the toll, you get on the
14 Internet.

15 Q. Okay. And does Verizon have -- itself, does it own a
16 bunch of IP addresses?

17 A. Yes, it does.

18 Q. Does Verizon know which IP addresses it owned in 2021?

19 A. Yes.

20 Q. I'm going to show you Government Exhibit -- I'm trying to
21 try to do two at a time here. I'm showing you on the left
22 side of your screen Government 801, and I'm showing you on the
23 right side of your screen 807 in evidence. Do you see that?

24 A. I see 801 and now I see 807.

25 Q. Are you familiar with this type of record?

MORROW - DIRECT

205

1 A. Yes, I am.

2 Q. What kind of record is this?

3 A. This is a subscriber detail that's generated by Verizon's
4 billing system.

5 Q. And can you tell from looking at this record who the
6 subscriber is?

7 A. Yes.

8 Q. Who is it?

9 A. First name, Tracy; last name, Wade.

10 Q. And is there an account number?

11 A. Yes, there is.

12 Q. Does it end in 310-1?

13 A. Yes, it does.

14 Q. And I just read that, for the record, from Government 801.
15 And now I'm looking at Government 807. Is that the same
16 account number?

17 A. The same account number, yes.

18 Q. I'm now looking on the left side at 301. Do you see where
19 it says "search value"?

20 A. Yes, I do.

21 Q. What does that mean?

22 A. That is the mobile number that was used to search for
23 these records.

24 Q. And does it end in 6800?

25 A. Yes, it does.

1 Q. And the fact that it came back under Tracy Wade, the 6800
2 number, what does that mean?

3 A. That means that that was one of the phone numbers that
4 were on Tracy Wade's account.

5 Q. And now looking at Government 807, do you see a search
6 value there?

7 A. Yes, I do.

8 Q. Is it a different phone number?

9 A. Yes, it is.

10 Q. Does it end in 1512?

11 A. Yes.

12 Q. What does that mean as far as the search value?

13 A. This was another phone number that was also on the same
14 account owned by Tracy Wade.

15 Q. I'm publishing on the left side of your screen Government
16 Exhibit 802, and I'm publishing on the right side of your
17 screen Government Exhibit 808. The left side, Government 802;
18 the right side, Government Exhibit 808.

19 Okay. Do you see 802 and 808 side by side?

20 A. Yes.

21 Q. Do you recognize this kind of record?

22 A. Yes.

23 Q. What is it?

24 A. These are device ID searches for a specific phone number.

25 Q. Okay. I'm going to highlight for you the two bottom lines

MORROW - DIRECT

207

1 of Government 802. Can you read that?

2 A. Yes, I can.

3 Q. And what information do you see here about the device ID
4 that you just mentioned?

5 A. Well, this shows two different devices having been
6 activated on a phone number ending with 6800.

7 Q. Do you see an effective date?

8 A. I do.

9 Q. What is it?

10 A. November 16, 2018.

11 Q. So that means that that phone was effective as of 2018 for
12 the number ending in 6800 --

13 A. That's correct.

14 Q. -- on Verizon's network?

15 A. That's correct.

16 Q. Okay. That was in Government 802.

17 Now I'm looking at Government 808. What
18 information -- you know what? I'm going to have to go to the
19 second page of this.

20 Do you see model information about a cell phone for
21 another line on this account?

22 A. Well, yes, I do.

23 Q. And what is that model?

24 A. So that's going to be a Galaxy S21 Ultra.

25 Q. And I'll represent to you that's the third line down;

1 correct?

2 A. That's correct.

3 Q. And we're on page 2, and the reason that this is on two
4 different pages is because this was produced to us in Excel.

5 A. Correct. And so the Excel spreadsheet doesn't recognize
6 if it's going to be able to fit on a letter-sized page or not.

7 Q. So scrolling back to page 1 and look at the third line.
8 What was the phone number -- if you can just give me the last
9 four digits -- to which that device was assigned?

10 A. That's going to be a phone number that ends with 1512.

11 Q. Okay. We're almost done here. I'm publishing for you on
12 the left side of your screen Government Exhibit 806, and I'm
13 publishing for you Government Exhibit 806.1 on the right side
14 of your screen.

15 Do you see that?

16 A. Yes, I do.

17 Q. First, what kind of record is this?

18 A. This is a copy of a billing statement.

19 Q. Okay. And is it for a particular account?

20 A. Yes, it is.

21 Q. What account?

22 A. The account number ending with 6310-00001, and it is
23 addressed to Tracy Wade.

24 Q. Okay. With respect to Government 806, I'm going to
25 page 248 of that exhibit. Do you see page 248?

MORROW - DIRECT

209

1 A. Yes.

2 Q. And who is the -- I actually misspoke. That's 806. I'm
3 on page 248 of 806 on the left side. And on 806.1, I'm going
4 to page 248. Okay.

5 They both appear to be call records for who?

6 A. These appear to be call records for a device user named
7 Tracy Wade.

8 Q. And what was that device?

9 A. That's going to be a Samsung Galaxy S21 Ultra.

10 Q. Does this document show the calls that were made from this
11 line during this period of the statement?

12 A. Yes, it does.

13 Q. Both calls that were incoming and outgoing?

14 A. Yes.

15 THE COURT: 4:23.

16 BY MR. SNIDER:

17 Q. Okay. Let's go to Government Exhibit -- the last one
18 here -- 805. Do you recognize Government Exhibit 805?

19 A. Yes, I do.

20 Q. And can you tell the jury what 805 is?

21 A. So this is a letter that indicates or, rather, confirms
22 that this list of numbers are IP addresses that were owned by
23 Verizon in the calendar year 2021.

24 Q. And in order for a person to have used these IP addresses
25 to access the Internet, would that person had to have been on

1 Verizon's network?

2 A. Yes, it does. As indicated in my previous testimony, it's
3 like a toll road. If you pay the fee, you're on the Internet.

4 Q. And if you are not on Verizon's network, could you access
5 these IP addresses?

6 A. Illegally, but yes. Otherwise, no.

7 MR. SNIDER: No further questions on direct.

8 THE COURT: All right.

9 Cross-examination.

10 MR. WILCOX: No cross-examination, Your Honor.

11 THE COURT: All right. Sir, permanent excusal?

12 MR. SNIDER: Yes.

13 MR. MCCRAY: Yes.

14 THE WITNESS: Thank you, Your Honor.

15 THE COURT: All right. So it's 4:25. So we're going
16 to recess at this time, ladies and gentlemen, resuming on
17 Tuesday morning at 9:30 AM. Everyone, please be safe and also
18 remember not to discuss the case in any way.

19 Have a great evening and a few days off and, again,
20 be very safe.

21 (Jury exited at 4:23 PM.)

22 THE COURT: Are there any additional matters for us
23 to address today?

24 MR. LOVE: Yes, Your Honor, there is. The Government
25 would like to make a record or have the Court make a record

1 based on the past two witnesses that were testifying. Those
2 jurors that were highlighted by the defense counsel, Juror
3 Number 4, Juror Number 5, Mr. Schaffer, were not conversing or
4 making any type of faces or anything like that.

5 THE COURT: I watched very carefully every second,
6 for the most part, and I did not observe any communication
7 between the two jurors. If something occurs, bring it to my
8 attention again.

9 MR. MCCRAY: Sure will, Judge.

10 MR. SNIDER: Judge, one other request, considering
11 we're going to be in recess now until next week -- until next
12 Tuesday, which is a week from today. I guess the question is
13 has the Court -- is the Court at this time ready to make a
14 ruling on 404(b) issues?

15 THE COURT: No, I'm not --

16 MR. SNIDER: I merely ask --

17 THE COURT: -- ruling. So what --

18 MR. SNIDER: I only ask because the two witnesses
19 that would provide the testimony that the Government is
20 seeking -- one is from Denver, Colorado and one is from
21 Austin, Texas, both of whom have arrived today, which means
22 they will have to go back to those states --

23 THE COURT: They wouldn't have testified today in any
24 event, but they would have testified tomorrow.

25 MR. SNIDER: Sure. But now the question is do we

1 need to -- if the Court is not going to allow it, we won't
2 bring them back. If the Court is still going to consider it,
3 then we will.

4 THE COURT: What's your position, defense?

5 Should I entertain this matter now or not? If I had
6 known previously, I could have looked more carefully at the
7 issue. In fact, I did discuss this second witness that was
8 brought to my attention yesterday, and I'm not clear on what
9 it is that you're trying to introduce -- and you may be
10 seated, ladies and gentlemen. But if --

11 MR. SNIDER: If the Court's not ready to take it up
12 now, that's fine. We'll just bring them back and take it up
13 next week.

14 MR. WILCOX: No.

15 THE COURT: No what?

16 MR. WILCOX: Your Honor, I prefer that we take it up
17 next week. I'm tired, basically.

18 THE COURT: How old are you, Mr. Wilcox?

19 MR. WILCOX: I'll be 68 next month.

20 THE COURT: Really? Welcome to the club. I'm not
21 tired. Seriously -- let me just ask a few questions -- and
22 you can be seated.

23 So this last witness that was brought to my attention
24 a few days ago, you will recall we had a status conference,
25 and the Government made reference to the 404(b), and I

1 entertained the discussion and advised the parties that I
2 wanted to wait until the Government's case concluded before
3 making a ruling with respect to the 404(b). Subsequent to
4 that time, you've made reference to what you characterize as
5 not being 404(b) but a part of the conspiracy.

6 Now, one thing I want to be mindful of is the 403
7 aspects. So I'm not going to try two other cases in this
8 case, as I mentioned. And I'm not sure what this second
9 witness -- what you consider as part of the conspiracy is
10 going to be testifying about as far as the incident. And you
11 made reference to some other loan that I became mindful of for
12 the first time because there's no additional loan, for lack of
13 a better term, in the indictment.

14 So I'm a little bit concerned about getting into some
15 other case. It took us five days to try the case of
16 Mrs. Wade, and so now this seems like another case -- in fact,
17 another two cases possibly with the 404(b) matter. And I
18 just -- you know, I don't want to spend a lot of time on these
19 other matters when the Government has control over how to
20 proceed.

21 You superseded the indictment, you decided these were
22 the charges you wanted to pursue, and now we're getting a
23 little far afield.

24 MR. SNIDER: So may I address those points?

25 THE COURT: Yes, sir. Yes, sir.

1 MR. SNIDER: Thank you.

2 Let me start with the other PPP loan for Wade Funeral
3 Home.

4 THE COURT: Which one is that?

5 MR. SNIDER: It's the loan that was applied for --
6 the Government's Exhibits are 165 through 171. This is a PPP
7 loan application submitted on behalf of Wade Funeral Home two
8 days -- within the exact same period, if not the same day, as
9 the loans in the indictment --

10 THE COURT: Okay.

11 MR. SNIDER: -- that are specifically alleged.
12 Now --

13 THE COURT: Specifically alleged --

14 MR. SNIDER: Well, in the subcounts, the two loans
15 that we've heard testimony about, the \$20,000 loans, yes.

16 THE COURT: Two of those.

17 MR. SNIDER: Two of those.

18 THE COURT: Yes.

19 MR. SNIDER: One is in Count 1 and one is Count 3.

20 THE COURT: Yes.

21 MR. SNIDER: The conspiracy that we alleged -- and I
22 want to make an analogy here. Maybe the Court will accept it.

23 THE COURT: All right. Try to be as succinct as
24 possible, Counsel.

25 MR. SNIDER: We're alleging a conspiracy to obtain

1 PPP loans based on false information, and the evidence that I
2 wanted to introduce was evidence of a PPP loan that contained
3 false information that was applied for if not the same day,
4 the day after the loans that we've been hearing about.

5 THE COURT: Sure. So why not in a manner and means
6 refer to it specifically so everybody's on notice as to what
7 you're talking about? There's a \$20,800 loan --

8 MR. SNIDER: Judge, the analogy -- I did a lot of
9 health care fraud cases and we charged --

10 THE COURT: Then you should know.

11 MR. SNIDER: Well, in a conspiracy to commit health
12 care fraud or wire fraud where health care fraud is the
13 object, there could be thousands of --

14 THE COURT: You're not following me. I'm talking
15 about putting people on notice as to what it is you're
16 charging. You've got a reference to, what, a \$3 million issue
17 and then a subsequent amount in excess of that, and now this
18 is what -- is it 700,000? Or what was the amount alleged in
19 the loan?

20 MR. SNIDER: The loan sought a \$700,000 PPP loan.

21 THE COURT: All right.

22 MR. SNIDER: And respectfully, Judge, Ms. Rivero was
23 aware of this. And when she testifies, I think it's fair for
24 me to ask her about it. "Were you aware of any other loans?"
25 She was. She received a document -- and actually, I want --

1 THE COURT: Yeah, she's aware. How about me? How
2 about the defense? How about us?

3 MR. SNIDER: I -- yes. I mean, I take the Court's
4 point that the Government controls the drafting of the
5 charging instrument. With respect to the conspiracy, I think
6 it puts them on notice that if -- none of the PPP loans are
7 specified in Count 1. It says that they're going to, you
8 know, apply for PPP loans based on false information,
9 including false tax documents. That's one of the loans. It's
10 the exact same time. It is -- I think it could not be more at
11 the heart of this conspiracy.

12 THE COURT: All right. We're not communicating,
13 obviously, because you're giving me the same argument and I'm
14 making the same position. I would like for you, you know, to
15 address the issue that I have discussed. I am not prepared to
16 decide the issue at this time.

17 MR. SNIDER: Okay. Very well.

18 THE COURT: I'm sorry.

19 All right. Thank you all, ladies and gentlemen.
20 Have a great, great several days off. Be safe, please, and
21 good day.

22 MR. SNIDER: Good day. Thank you.

23 (Proceedings adjourned 4:34 PM.)
24
25

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

CERTIFICATE OF REPORTER

I certify that the foregoing is a correct transcription of the record of proceedings in the above-entitled matter prepared from my stenotype notes.

DATE: 14th of May, 2025

/s/Lance W. Steinbeisser
Lance W. Steinbeisser,
FCRR, RPR, FPR-C
Official Court Reporter
United States District Court
Southern District of Florida
Miami, Florida

\$	146:1 102.2E [2] - 142:4, 142:10 102E [4] - 140:19, 140:20, 140:25, 141:12 103 [1] - 98:19 104 [2] - 98:20, 100:7 1040 [2] - 82:12, 110:6 105 [1] - 100:12 1051 [2] - 115:14, 115:16 106 [1] - 100:25 107 [1] - 102:8 107.131.161.84 [1] - 112:11 108 [1] - 102:16 109 [1] - 101:9 10:05 [1] - 89:20 10:05:41 [2] - 158:13, 158:22 10:06 [1] - 89:22 10:06:04 [2] - 158:15, 158:24 10:06:41 [1] - 158:12 10:23 [1] - 116:19 10:39 [2] - 34:5, 34:6 10:54 [2] - 34:6, 34:7 11 [4] - 130:8, 183:15, 183:17, 194:3 110 [1] - 101:16 111 [1] - 101:25 112 [1] - 102:4 112,430 [6] - 77:20, 78:6, 78:15, 78:22, 79:22, 82:15 1122 [2] - 116:10, 116:14 113 [3] - 22:1, 103:13, 103:16 113,560 [4] - 103:1, 103:4, 104:3, 105:2 114 [12] - 191:5, 191:16, 191:21, 192:1, 192:5, 192:25, 193:4, 193:22, 194:3, 194:5, 194:9, 198:3 114.1 [2] - 195:17, 195:18 115 [4] - 197:24, 197:25, 199:14, 200:3 115.1 [1] - 200:5 116 [9] - 104:19, 104:22, 105:10, 105:23, 107:8, 107:23, 108:1, 108:12, 110:3 117 [13] - 15:11, 18:13, 21:3, 21:16, 22:19, 27:24, 33:7, 109:11, 109:14, 110:1, 110:18, 111:2, 111:17 118 [2] - 23:5, 32:19 119 [2] - 25:24, 26:3 11:26 [1] - 112:5 12 [8] - 10:22, 17:20, 17:25, 18:5, 27:20, 38:11, 159:13, 194:5 120 [6] - 113:5, 113:12, 113:17, 115:5, 116:12, 122:7 120.1 [5] - 113:6, 113:20, 114:25, 115:7, 115:15 121 [2] - 116:4, 116:21 1214 [2] - 117:6, 117:7 1216 [3] - 119:16, 119:17, 119:20 122 [4] - 117:2, 117:3, 117:13, 118:19 1225 [1] - 141:21 1229 [4] - 120:6, 120:10, 120:11, 120:13 123 [5] - 118:24, 118:25, 119:5, 119:15, 119:20 125 [6] - 138:12, 138:15, 142:25, 146:14, 166:14, 189:9 1268 [4] - 120:17, 120:24, 121:1, 121:4 127 [2] - 119:23, 120:5 12:30 [3] - 95:3, 95:6, 106:12 12:31 [1] - 107:1 13 [5] - 116:19, 184:15, 185:7, 194:9, 196:10 134 [1] - 120:16 138 [2] - 121:10 13th [1] - 101:5 14 [2] - 185:6, 185:8 147 [3] - 2:6, 115:9, 115:11 149 [3] - 64:21, 64:22, 70:8 15 [13] - 20:23, 54:14, 143:25, 144:22, 161:13, 162:14, 169:5, 169:20, 169:23, 169:25, 185:16, 201:25, 202:6 150 [2] - 69:14, 69:15 150,000 [1] - 18:7 1500 [4] - 121:22, 121:24, 122:2, 122:9 151 [2] - 70:14, 70:15 1512 [4] - 71:18, 132:1, 206:10, 208:10 152 [3] - 73:13, 73:14, 75:8 152.1 [2] - 75:10 152.2 [4] - 75:16, 75:17, 76:4, 76:5 152.3 [3] - 75:20, 76:7, 76:8 152.4 [2] - 76:11 153 [2] - 76:19, 76:22 154 [3] - 29:15, 79:9, 79:10 155 [1] - 80:19 156 [10] - 177:13, 177:16, 178:18, 181:2, 181:13, 182:5, 182:11, 182:22, 185:17, 190:5 156.1 [5] - 187:8, 187:25, 188:6, 188:13, 189:6 156.2 [6] - 187:9, 188:14, 188:16, 189:23, 190:18 157 [12] - 81:21, 83:3, 83:24, 84:17, 85:15, 87:16, 88:15, 89:25, 90:22, 91:20, 94:15, 152:15 157.1 [3] - 84:20, 85:7, 156:13 158 [8] - 87:10, 87:11, 88:1, 88:7, 90:22, 91:20, 94:14, 158:4 159 [16] - 26:19, 28:3, 29:2, 29:11, 32:5, 90:14, 90:15, 91:18, 92:1, 92:8, 92:25, 93:16, 94:14, 159:7, 170:14 15th [1] - 12:9 16 [3] - 144:22, 185:24, 207:10 160 [2] - 30:13, 30:22 161 [1] - 32:9 162E [8] - 122:23, 123:3, 123:10, 125:2, 140:13, 160:12, 160:13 163 [8] - 130:12, 130:13, 130:19, 134:8, 136:12, 136:22, 140:13 163E [3] - 130:10, 130:11, 130:12 164 [2] - 139:2, 159:23 164E [2] - 139:6, 140:14 165 [1] - 214:6 166 [16] - 72:7, 99:22, 129:5, 129:11, 129:18, 129:20, 134:14, 138:2, 138:5, 141:20, 141:24, 142:23, 143:2, 146:10, 166:5, 196:3 168 [1] - 2:7 17 [2] - 144:22, 186:8 171 [1] - 214:6 173 [1] - 2:8 174 [11] - 130:1, 135:4, 135:9, 135:12, 135:21, 138:8, 142:2, 143:4, 145:2, 190:12, 196:12 174.211.100.223 [1] - 90:13 174.211.160.92 [1] - 94:13 174.228.132.36 [2] - 130:3, 184:18 174.228.144.190 [1] - 87:8 174.228.361.84 [1] - 200:13 174.228.6.224 [1] - 109:4 18 [12] - 20:21, 20:25, 86:13, 86:21, 86:25, 88:13, 89:18, 107:19, 108:24, 144:22, 164:23, 186:15 184 [5] - 142:2, 143:5, 145:4, 147:1, 196:12 18th [1] - 203:2 19 [5] - 89:20, 89:22,			
/				
/s/Lance [1] - 217:6				
0				
00 [1] - 72:2 05 [1] - 71:9				
1				
1 [11] - 1:8, 14:25, 19:4, 19:19, 21:2, 22:16, 30:22, 189:22, 208:7, 214:19, 216:7 10 [5] - 162:14, 162:22, 174:11, 183:7, 193:22 100 [4] - 14:22, 24:8, 95:11, 95:12 100,000 [1] - 18:7 1001 [1] - 20:21 101 [2] - 98:8, 98:9 1014 [1] - 20:25 102.1E [2] - 143:7,				

111:11, 144:23 1973 [1] - 67:11 1975 [1] - 96:19 1:35 [1] - 106:10 1:38 [2] - 107:1, 107:2	74:15, 101:8 21 [1] - 175:14 217 [1] - 1:8 22 [1] - 32:18 224 [1] - 109:6 229 [1] - 166:12 22nd [1] - 217:6 23 [3] - 26:12, 158:20, 158:24 23-CR-60173-KMW [1] - 1:2 24 [1] - 4:14 2438 [2] - 69:7, 90:10 248 [4] - 208:25, 209:3, 209:4 2483 [6] - 13:17, 62:21, 69:11, 85:15, 90:21, 110:12 2483-C [30] - 12:1, 15:20, 56:22, 57:3, 58:24, 60:25, 61:9, 63:13, 82:1, 82:9, 87:14, 87:25, 90:7, 90:19, 91:8, 93:14, 93:18, 104:23, 105:15, 107:21, 108:12, 109:16, 110:2, 110:13, 110:25, 111:19, 118:7, 118:14, 170:12, 171:3 2483-Cs [1] - 98:6 26 [3] - 76:9, 76:13, 101:12 261-67-4088 [2] - 29:22, 67:1 26th [1] - 135:25 27 [5] - 29:10, 92:7, 94:2, 94:4, 94:6 274-6800 [1] - 96:13 28 [4] - 21:11, 111:1, 112:4, 112:10 2869 [1] - 108:2 29 [2] - 76:9, 76:13 2969 [1] - 111:18 299 [1] - 167:20 29th [1] - 101:12 2:09 [1] - 196:10 2:15 [2] - 112:5, 112:6 2:54 [1] - 188:4 2:58 [1] - 161:17 2nd [1] - 67:11	42:21, 83:3, 88:7, 91:18, 105:23, 134:7, 134:15, 178:23, 188:20, 190:17, 192:1, 214:19, 215:16 30 [7] - 21:1, 125:2, 126:23, 161:25, 162:13, 162:16, 162:22 301 [1] - 205:18 305.523.5633 [1] - 1:23 31 [5] - 79:23, 79:24, 104:4, 104:7, 131:8 310-1 [1] - 205:12 315 [1] - 27:6 32 [1] - 8:5 33009 [1] - 27:6 33128 [1] - 1:23 33314 [3] - 16:12, 22:13, 23:20 34 [1] - 2:4 3508-S [2] - 23:6, 30:14 3571 [1] - 20:21 36 [6] - 166:12, 185:11, 185:19, 186:11, 186:20, 190:10 37 [1] - 86:25 3:02 [1] - 163:22 3:19 [2] - 163:22, 163:23	161:15, 163:8, 163:10, 163:11, 164:1, 164:5 4:02 [1] - 194:16 4:15 [1] - 163:18 4:23 [2] - 209:15, 210:21 4:25 [1] - 210:15 4:30 [3] - 164:4, 164:7, 194:18 4:34 [2] - 1:6, 216:23 4:36 [2] - 71:4, 71:22 4:37 [1] - 129:24 4:38 [1] - 129:24 4th [7] - 71:12, 71:13, 74:6, 74:11, 99:14, 101:5, 129:24	7 7 [20] - 22:16, 25:8, 29:24, 31:6, 31:25, 79:20, 80:4, 82:13, 90:24, 96:19, 103:25, 104:7, 105:1, 110:8, 122:6, 122:10, 182:5, 188:20, 192:25, 199:14 700,000 [1] - 215:18 761.101.831.25 [1] - 184:12 786 [2] - 66:10, 71:18 7:00 [1] - 122:6 7:15 [1] - 122:10 7:27 [1] - 99:14 7:30 [2] - 86:13, 86:19 7:30:50 [1] - 157:6 7:31 [2] - 86:13, 86:23 7:31:37 [1] - 157:8 7:34 [2] - 189:2, 190:2 7:35 [1] - 190:16 7:38 [1] - 190:20 7:49 [1] - 190:25 7:54 [1] - 108:25 7:54:41 [1] - 164:24 7:56 [1] - 109:1 7:56:24 [1] - 164:24 7th [1] - 76:6
2			5	
2 [14] - 1:7, 15:2, 31:18, 31:25, 119:13, 125:1, 131:8, 188:20, 189:5, 189:13, 191:21, 198:10, 198:11, 208:3 2-6 [1] - 101:15 2.5 [3] - 18:5, 27:21, 38:13 20 [2] - 93:16, 111:17 20,833 [2] - 38:20, 92:13 200 [2] - 2:9, 14:22 2011 [1] - 16:7 2018 [2] - 207:10, 207:11 2019 [15] - 16:21, 17:7, 27:4, 27:11, 29:16, 55:9, 76:25, 77:8, 77:10, 78:14, 79:13, 82:17, 91:2, 103:17, 105:6 202 [1] - 2:10 2020 [11] - 12:9, 46:15, 55:9, 76:6, 76:9, 76:13, 101:12 2021 [42] - 11:8, 11:10, 19:22, 21:11, 25:8, 26:12, 29:10, 31:7, 31:18, 31:25, 32:18, 71:5, 71:22, 74:7, 86:13, 86:21, 86:25, 88:13, 89:18, 89:20, 89:22, 92:7, 94:2, 94:4, 94:6, 99:14, 107:19, 108:24, 111:1, 112:4, 112:10, 113:22, 116:19, 122:10, 129:24, 132:6, 164:23, 176:1, 176:3, 204:18, 209:23 2022 [1] - 46:16 2024 [2] - 1:4, 71:4 2025 [1] - 217:6 207 [2] - 16:11, 23:20 2097 [3] - 73:9			5 [7] - 19:21, 166:12, 172:8, 181:1, 188:20, 199:1, 211:3 5/18/2021 [1] - 157:6 5400 [1] - 11:20 59 [1] - 37:2 592-09-0026 [2] - 22:15, 96:1 596E [1] - 89:8 5:45 [1] - 162:5	
			6	
		4	6 [8] - 76:6, 134:7, 134:16, 181:12, 188:4, 188:20, 199:4 60 [2] - 24:8, 24:9 6110 [3] - 16:11, 22:13, 23:20 6261949003 [1] - 32:17 6310-00001 [1] - 208:22 645 [1] - 20:23 68 [1] - 212:19 6800 [5] - 144:3, 205:24, 206:1, 207:6, 207:12 6:28 [1] - 108:25 6F00 [2] - 109:17, 111:21 6th [2] - 74:12, 135:23 6XT [1] - 185:7	
	3			8
	3 [19] - 18:13, 18:16, 18:21, 28:3, 28:4,	4 [19] - 2:4, 21:3, 21:4, 29:2, 71:4, 71:22, 83:24, 92:1, 107:8, 107:11, 110:18, 132:6, 166:12, 172:10, 179:12, 188:20, 190:17, 192:5, 211:3 40 [1] - 24:10 400 [1] - 1:22 403 [1] - 213:6 404(b) [4] - 211:14, 212:25, 213:5, 213:17 404(b) [1] - 213:3 43 [1] - 112:5 45 [1] - 2:6 47 [3] - 157:12, 157:16, 158:1 488-1512 [1] - 66:10 4:00 [7] - 161:14,		8 [10] - 1:4, 21:16, 21:17, 29:11, 182:11, 188:20, 189:13, 193:4, 199:16 8,333 [1] - 17:22 801 [3] - 204:22, 204:24, 205:14 802 [5] - 206:16, 206:17, 206:19, 207:1, 207:16 805 [3] - 209:18, 209:20 806 [4] - 208:12, 208:24, 209:2, 209:3 806.1 [2] - 208:13, 209:3 807 [4] - 204:23, 204:24, 205:15, 206:5

808 [4] - 206:17, 206:18, 206:19, 207:17 8197 [1] - 89:3 87OP [1] - 185:16 8:25 [1] - 94:2	196:14 account [31] - 53:23, 53:25, 55:10, 56:1, 74:20, 80:24, 80:25, 81:6, 100:21, 101:14, 102:15, 138:11, 149:24, 149:25, 150:4, 150:10, 150:12, 150:14, 150:15, 150:19, 174:19, 175:11, 205:10, 205:16, 205:17, 206:4, 206:14, 207:21, 208:19, 208:21, 208:22 accountholders [2] - 101:13, 203:25 accounts [1] - 100:15 accurate [7] - 13:17, 13:20, 13:23, 20:17, 25:22, 83:15, 165:24 achieve [1] - 175:21 acknowledge [1] - 29:7 acknowledgement [3] - 20:7, 20:11, 21:5 acknowledging [2] - 20:5, 29:4 Act [6] - 6:12, 6:13, 6:16, 19:20, 19:21, 19:22 actions [2] - 137:6, 137:8 activated [1] - 207:6 active [1] - 74:20 actively [1] - 156:2 activities [1] - 166:5 activity [2] - 11:7, 50:17 actual [7] - 13:5, 35:2, 93:11, 117:13, 137:5, 180:14, 189:9 ad [1] - 53:18 ADAM [1] - 1:13 Add [1] - 155:18 added [3] - 117:16, 117:23, 127:9 adding [1] - 127:14 addition [1] - 50:14 additional [11] - 139:12, 141:23, 161:8, 182:7, 189:13, 195:20, 195:23, 200:2, 200:8, 210:22,	213:12 ADDR [1] - 125:10 address [148] - 16:10, 16:19, 21:20, 22:12, 23:19, 27:5, 27:7, 30:19, 35:4, 48:17, 51:3, 51:10, 51:15, 52:2, 52:3, 52:8, 52:17, 53:24, 54:1, 54:3, 54:5, 54:10, 54:24, 64:1, 65:18, 65:23, 66:4, 66:17, 66:19, 70:24, 72:5, 72:7, 72:9, 72:10, 73:22, 85:24, 86:1, 86:10, 87:1, 87:5, 89:12, 90:6, 90:9, 93:23, 94:7, 96:6, 96:8, 96:14, 99:19, 100:1, 108:16, 108:18, 109:3, 112:2, 112:7, 112:11, 112:13, 113:14, 113:16, 113:19, 115:16, 116:21, 117:8, 117:11, 118:10, 118:14, 119:18, 120:11, 120:14, 121:25, 122:3, 122:9, 125:10, 125:16, 128:25, 129:3, 129:10, 129:18, 129:21, 129:25, 130:3, 130:4, 130:7, 130:21, 131:2, 131:6, 131:15, 133:18, 134:12, 135:11, 135:22, 137:15, 138:2, 138:5, 138:8, 138:9, 138:12, 140:10, 141:3, 141:14, 141:18, 142:1, 142:20, 142:23, 143:20, 143:22, 144:16, 144:25, 146:6, 146:10, 146:14, 146:25, 150:8, 150:20, 150:22, 159:17, 160:5, 160:6, 166:4, 166:5, 166:13, 167:19, 178:4, 184:8, 184:11, 184:17, 184:18, 185:2, 185:11, 185:17, 186:2,	186:11, 187:12, 187:14, 187:18, 190:10, 196:2, 196:3, 196:11, 196:25, 197:4, 200:11, 204:6, 210:23, 213:24, 216:15 addressed [2] - 99:12, 208:23 addresses [23] - 96:25, 112:22, 112:25, 125:13, 125:14, 125:19, 135:8, 136:4, 147:23, 148:10, 148:21, 150:13, 160:3, 160:8, 166:11, 166:18, 167:2, 167:15, 204:16, 204:18, 209:22, 209:24, 210:5 adjourned [1] - 216:23 Administration [5] - 3:13, 4:10, 4:12, 4:16, 19:17 adopt [2] - 155:20, 155:21 adopting [1] - 63:7 advertisement [1] - 149:15 advice [2] - 4:24, 5:1 advised [4] - 3:5, 163:25, 164:1, 213:1 afield [1] - 213:23 afternoon [9] - 107:6, 147:17, 147:18, 160:15, 173:14, 173:15, 200:21, 202:22, 202:23 agency [2] - 4:20, 6:18 agent [8] - 133:19, 135:1, 136:2, 137:17, 137:18, 146:6, 146:20, 146:24 ago [9] - 23:2, 30:10, 68:21, 71:1, 79:25, 95:15, 172:21, 195:13, 212:24 agree [1] - 29:7 ahead [1] - 119:6 Aid [3] - 6:11, 19:19, 19:20 aided [1] - 1:25 alcohol [1] - 175:13	alleged [4] - 214:11, 214:13, 214:21, 215:18 alleging [1] - 214:25 allow [5] - 39:16, 161:2, 182:2, 202:10, 212:1 allowed [1] - 161:1 allowing [2] - 25:16, 51:24 allows [3] - 37:19, 176:10, 203:21 almost [2] - 87:17, 208:11 ALSO [1] - 1:18 Althea [3] - 3:12, 3:22, 4:2 ALTHEA [3] - 2:3, 3:24, 4:2 AM [22] - 1:6, 3:15, 34:5, 34:6, 34:7, 86:13, 86:19, 86:23, 89:18, 89:20, 89:22, 108:25, 109:1, 112:5, 122:6, 122:10, 157:6, 188:4, 210:17 Amandeep [2] - 45:7, 45:11 AMANDEEP [3] - 2:5, 45:8, 45:12 AMERICA [1] - 1:3 America [1] - 8:6 American [1] - 19:22 amount [32] - 9:4, 10:10, 17:6, 17:21, 17:23, 18:6, 18:8, 21:6, 26:13, 26:16, 27:14, 27:18, 27:19, 27:21, 27:22, 29:5, 31:17, 32:18, 35:5, 40:21, 42:16, 60:8, 77:1, 82:12, 87:19, 92:13, 102:25, 105:1, 110:5, 215:17, 215:18 amounts [1] - 40:25 analogy [2] - 214:22, 215:8 analyst [1] - 203:4 Android [11] - 133:14, 134:3, 134:5, 135:18, 145:16, 147:10, 184:25, 190:5, 190:8, 196:21, 200:15 announce [1] - 15:3
9				
9 [6] - 89:3, 108:1, 111:2, 182:22, 193:17, 199:20 9014 [1] - 92:1 9029 [1] - 92:25 9030 [1] - 93:17 95 [1] - 3:5 954 [1] - 96:13 96,882 [2] - 102:25, 104:5 97,460 [3] - 77:10, 79:24, 80:1 9:08 [1] - 89:18 9:30 [1] - 210:17 9:31 [1] - 94:4 9:31:51 [1] - 159:10 9:33 [1] - 94:6 9:33:03 [1] - 159:11 9:50 [1] - 1:6 9:52 [1] - 3:15				
A				
able [18] - 7:1, 58:21, 58:22, 78:16, 102:25, 150:4, 150:24, 155:2, 174:1, 182:15, 183:12, 188:19, 194:1, 194:7, 194:14, 194:19, 199:17, 208:6 above-entitled [1] - 217:5 absolutely [2] - 12:12, 19:5 accept [2] - 155:19, 214:22 access [14] - 4:23, 46:12, 52:3, 81:11, 81:12, 150:6, 150:12, 150:15, 168:14, 187:20, 203:22, 204:11, 209:25, 210:4 accessed [1] - 150:14 according [6] - 18:11, 24:3, 69:2, 136:3, 146:19,				

announced [1] - 161:15 annual [1] - 10:20 answer [2] - 40:18, 149:20 anticipating [1] - 164:3 Apartment [2] - 16:11, 23:20 API [1] - 81:12 apologize [2] - 15:16, 45:4 app [1] - 176:12 appear [59] - 70:3, 70:10, 74:6, 75:11, 75:17, 75:20, 76:11, 83:16, 87:13, 88:7, 89:12, 90:20, 91:22, 92:2, 92:4, 93:6, 93:23, 97:23, 101:10, 101:17, 104:6, 105:15, 106:5, 110:1, 110:12, 110:18, 110:21, 111:3, 111:8, 113:13, 115:11, 115:15, 116:16, 117:7, 117:10, 119:17, 119:20, 120:10, 120:13, 121:1, 121:4, 121:24, 122:2, 125:11, 126:22, 129:6, 130:17, 135:8, 154:24, 155:13, 155:17, 156:6, 172:14, 180:21, 189:14, 192:22, 195:23, 209:5, 209:6 appeared [4] - 25:1, 31:4, 80:1, 170:9 appearing [1] - 174:22 Apple [2] - 133:23, 134:3 applicant [29] - 12:22, 19:14, 21:18, 24:15, 54:11, 54:12, 54:24, 63:23, 63:24, 65:12, 65:21, 70:21, 70:24, 73:3, 74:24, 74:25, 75:1, 81:17, 82:3, 83:9, 84:3, 98:14, 101:24, 118:4, 118:15, 118:16, 126:7,	170:3, 182:17 applicants [5] - 7:11, 11:12, 49:6, 100:19, 176:5 application [198] - 7:15, 9:12, 9:13, 9:14, 11:25, 12:10, 13:5, 13:23, 15:21, 15:24, 18:11, 18:24, 19:16, 20:16, 21:10, 21:23, 22:22, 23:6, 23:8, 23:9, 24:4, 26:21, 27:22, 27:23, 27:24, 28:6, 28:12, 28:23, 29:3, 29:9, 30:3, 30:4, 30:15, 31:2, 31:15, 31:19, 31:20, 31:21, 31:22, 32:6, 32:20, 32:22, 32:23, 32:25, 33:7, 33:11, 35:2, 35:3, 35:6, 35:12, 35:22, 36:12, 37:4, 37:5, 39:15, 40:16, 41:9, 42:12, 43:7, 43:11, 43:20, 44:8, 44:14, 49:5, 49:10, 49:17, 52:6, 52:9, 52:20, 53:11, 55:2, 55:3, 55:23, 56:17, 57:1, 57:22, 57:23, 58:1, 58:3, 58:13, 59:7, 59:24, 60:5, 60:10, 61:1, 63:22, 64:1, 65:5, 65:6, 65:8, 66:11, 67:16, 67:19, 68:3, 68:4, 68:13, 68:14, 68:21, 69:12, 69:22, 69:24, 70:2, 70:3, 70:6, 70:7, 70:11, 72:5, 72:11, 72:20, 73:19, 79:1, 80:9, 85:15, 87:25, 90:18, 92:20, 95:17, 96:15, 97:2, 97:3, 97:9, 97:15, 98:5, 98:12, 98:17, 99:19, 100:10, 102:21, 103:20, 104:11, 106:1, 109:15, 111:4, 112:12, 112:14, 115:22, 115:24, 116:2, 116:22, 116:23, 118:2, 118:15, 122:15, 123:5, 123:15, 123:16, 124:24,	126:10, 126:11, 126:15, 126:16, 126:18, 126:25, 128:1, 128:3, 128:4, 128:11, 128:15, 128:19, 128:21, 129:12, 138:4, 139:8, 139:13, 139:19, 139:24, 140:14, 141:11, 141:19, 142:13, 142:18, 146:3, 149:23, 150:3, 150:21, 151:5, 151:21, 151:25, 152:5, 152:12, 152:17, 153:8, 153:18, 154:3, 154:6, 155:7, 157:19, 157:24, 158:5, 158:7, 158:9, 164:15, 164:22, 165:17, 171:13, 176:11, 214:7 applications [19] - 8:17, 14:1, 34:21, 43:9, 43:15, 59:21, 60:16, 68:1, 117:16, 118:2, 148:2, 148:13, 153:4, 154:8, 154:11, 159:18, 170:3, 170:12, 176:20 applied [5] - 9:10, 62:21, 214:5, 215:3 apply [11] - 7:11, 10:8, 13:13, 23:3, 37:20, 48:10, 48:15, 49:14, 53:11, 121:14, 216:8 applying [10] - 15:23, 23:15, 26:22, 56:19, 59:14, 59:15, 104:23, 176:6, 176:21, 177:4 approach [1] - 171:24 appropriate [3] - 124:16, 153:12, 201:2 appropriately [1] - 13:13 approval [2] - 26:11, 98:1 approved [8] - 32:17, 56:8, 59:24, 60:1,	60:2, 60:3, 128:10, 128:11 April [1] - 217:6 area [2] - 46:1, 85:17 argument [1] - 216:13 arrived [1] - 211:21 arriving [1] - 3:4 aspect [3] - 8:10, 121:17, 203:21 aspects [2] - 25:18, 213:7 Assets [1] - 183:14 assign [1] - 124:23 assigned [6] - 31:16, 51:18, 108:9, 133:1, 166:18, 208:9 assigns [1] - 26:9 assist [1] - 6:3 assistance [6] - 5:4, 5:7, 5:20, 14:9, 24:15, 24:18 associated [28] - 28:12, 61:5, 61:6, 65:6, 66:11, 68:13, 68:14, 69:5, 75:14, 85:2, 88:14, 96:4, 109:21, 116:1, 125:14, 126:9, 128:14, 128:18, 131:7, 133:10, 141:18, 159:17, 165:16, 167:22, 167:24, 183:19, 188:1, 192:16 assume [1] - 14:24 assuming [1] - 98:7 attempt [18] - 131:7, 132:19, 132:25, 133:2, 133:3, 137:3, 139:1, 193:1, 193:5, 193:18, 193:19, 193:20, 194:4, 194:11, 198:19, 198:20, 199:15, 201:14 attempted [3] - 51:8, 190:15, 201:13 attempting [1] - 177:22 attempts [9] - 131:4, 131:8, 137:19, 143:11, 143:12, 180:5, 192:9, 192:10, 193:15 attention [15] - 5:17, 15:22, 18:14, 19:24, 20:13,	23:23, 25:9, 32:20, 85:7, 166:3, 172:3, 172:6, 211:8, 212:8, 212:23 attesting [2] - 20:5, 28:19 Attorney's [1] - 1:14 attributed [1] - 114:2 attributes [1] - 178:8 audit [6] - 52:23, 52:25, 53:5, 53:6, 139:17, 142:11 August [5] - 25:8, 31:6, 31:25, 122:6, 122:10 AUSA [2] - 1:13, 1:13 Austin [1] - 211:21 author [3] - 47:8, 47:10, 47:11 authorized [1] - 24:21 auto [2] - 78:19, 103:11 auto-correction [2] - 78:19, 103:11 available [7] - 11:8, 40:5, 48:13, 57:25, 60:8, 60:21, 154:5 Avenue [1] - 1:22 average [2] - 17:21, 27:20 averaged [1] - 10:20 aware [7] - 37:15, 84:8, 121:17, 121:18, 215:23, 215:24, 216:1
B				
B-E-R-G-H [1] - 173:11 bachelor's [1] - 47:14 backed [2] - 12:23, 12:24 backend [1] - 48:23 background [1] - 47:13 balance [1] - 13:3 Bank [1] - 75:14 bank [54] - 9:20, 35:19, 35:21, 36:3, 36:7, 36:21, 41:10, 55:10, 55:16, 55:24, 55:25, 56:1, 56:3, 56:7, 73:7, 73:9, 73:17, 74:15, 74:16, 74:20, 75:7, 75:13, 75:18, 75:22, 76:12,				

76:14, 76:17, 81:6, 100:5, 100:7, 100:15, 100:18, 100:21, 100:22, 101:4, 101:8, 101:11, 101:20, 102:2, 102:3, 102:14, 102:15, 136:25, 137:24, 138:10, 138:11, 138:17, 146:2, 174:19, 175:10, 175:11 bank's [2] - 41:17, 41:22 banks [6] - 5:3, 5:13, 35:9, 35:12, 43:16, 74:21 barcode [3] - 194:2, 194:8, 194:15 based [32] - 9:15, 10:16, 15:23, 16:21, 17:13, 17:22, 17:24, 48:15, 53:4, 63:10, 65:5, 65:16, 74:15, 79:7, 87:17, 110:4, 130:8, 140:16, 148:21, 153:12, 158:2, 158:11, 158:17, 159:5, 163:1, 187:18, 188:19, 189:1, 191:20, 211:1, 215:1, 216:8 basis [3] - 62:2, 62:3, 62:4 Bates [7] - 89:3, 89:4, 92:1, 92:25, 93:17, 108:2, 111:17 Bates-stamped [3] - 89:3, 92:1, 93:17 bathroom [1] - 34:1 Bay [1] - 46:1 BBBC [3] - 91:15, 92:9, 93:8 became [1] - 213:11 become [1] - 106:14 BEFORE [1] - 1:10 began [2] - 9:6, 64:5 begin [2] - 63:18, 64:2 beginning [1] - 122:13 BEHALF [1] - 1:15 behalf [3] - 151:6, 174:22, 214:7 behavior [2] - 201:3, 201:9 BEKB [1] - 191:13	belonged [1] - 167:12 belongs [1] - 179:10 below [3] - 128:9, 164:23, 179:13 Bergh [6] - 173:10, 173:14, 177:16, 191:5, 200:16, 200:21 BERGH [2] - 2:8, 173:7 best [1] - 204:12 better [1] - 213:13 between [3] - 118:2, 170:7, 211:7 beyond [1] - 164:6 BF27 [3] - 105:14, 107:25, 108:10 big [3] - 10:5, 156:9, 163:3 bigger [3] - 65:2, 114:15, 115:6 billing [2] - 205:4, 208:18 bioengineering [1] - 47:17 birth [7] - 55:6, 67:9, 96:19, 96:22, 128:16, 140:1, 178:2 bit [6] - 151:16, 163:8, 164:2, 164:5, 199:18, 213:14 black [1] - 172:9 block [4] - 38:16, 38:17, 107:11, 110:19 blowing [1] - 68:6 blurry [1] - 199:19 bold [1] - 119:8 bolded [2] - 18:14, 19:8 borrower [35] - 9:16, 13:2, 20:8, 24:2, 24:15, 24:20, 24:25, 25:20, 26:5, 26:16, 26:18, 26:21, 28:5, 28:11, 29:6, 30:24, 32:10, 32:12, 33:15, 33:16, 33:20, 35:6, 36:2, 36:9, 36:11, 36:22, 41:20, 41:23, 44:3, 150:16, 150:17, 151:4, 151:6, 152:17, 153:6 borrower's [4] - 15:20, 20:4, 28:18,	152:4 borrowers [4] - 26:10, 34:19, 48:14, 49:2 bottom [7] - 18:10, 19:24, 28:20, 115:7, 130:8, 156:18, 206:25 box [13] - 15:25, 16:3, 16:4, 17:19, 18:12, 26:25, 27:7, 27:18, 27:20, 28:2, 31:14, 105:8, 181:8 boxes [2] - 31:12, 41:1 Bravo [4] - 85:6, 88:16, 165:17 bravo [5] - 85:13, 91:14, 91:17 break [13] - 34:1, 34:3, 55:15, 58:14, 95:2, 95:3, 95:5, 106:9, 106:16, 107:7, 160:15, 161:12, 163:17 breaking [1] - 106:20 brief [1] - 202:12 briefly [3] - 44:19, 73:2, 81:7 bring [6] - 3:7, 172:2, 172:6, 211:7, 212:2, 212:12 brought [3] - 172:7, 212:8, 212:23 browser [7] - 133:4, 133:5, 133:9, 134:23, 135:19, 145:16, 145:17 bugs [1] - 62:16 build [2] - 46:21, 175:21 bullet [1] - 19:9 bunch [6] - 117:24, 125:11, 125:25, 179:13, 180:9, 204:16 Business [6] - 3:13, 4:10, 4:12, 4:16, 19:17, 32:15 business [87] - 4:22, 4:24, 5:11, 5:16, 6:17, 6:19, 6:23, 7:4, 7:10, 7:14, 7:17, 7:19, 8:9, 9:5, 9:10, 9:20, 10:3, 10:4, 10:5, 10:7, 10:24, 12:3, 12:7, 12:8, 12:17, 15:23, 16:1, 16:8, 16:10, 16:15, 16:17,	16:18, 16:24, 17:7, 17:20, 18:6, 18:11, 18:23, 21:19, 21:20, 21:21, 22:3, 22:10, 22:12, 22:17, 23:15, 24:10, 24:11, 24:12, 24:13, 26:22, 26:24, 27:1, 27:5, 27:8, 27:18, 29:17, 29:18, 30:16, 30:18, 32:6, 33:8, 33:12, 35:4, 35:9, 38:23, 38:24, 39:7, 39:18, 40:19, 40:21, 40:24, 42:3, 42:6, 46:10, 48:10, 55:8, 56:20, 74:22, 75:1, 75:4, 79:18, 91:6, 104:24, 142:13, 203:4 Businesses [1] - 19:21 businesses [15] - 4:21, 5:2, 5:5, 5:10, 5:20, 6:2, 7:24, 8:2, 8:6, 11:17, 11:18, 12:20, 17:3, 26:1, 46:11 buttons [1] - 153:20 BY [26] - 4:6, 15:10, 15:18, 31:10, 33:6, 34:10, 36:19, 45:14, 64:19, 95:10, 107:5, 147:16, 164:13, 165:10, 166:25, 168:9, 169:14, 169:18, 171:1, 173:13, 173:25, 193:16, 194:22, 200:20, 202:21, 209:16	114:20, 116:12 can.. [1] - 76:1 cannot [1] - 192:13 capable [1] - 165:22 capacity [1] - 60:22 capped [3] - 17:14, 17:15, 17:23 capture [13] - 50:25, 51:8, 52:5, 52:8, 52:15, 52:17, 59:10, 90:6, 90:9, 109:2, 112:7, 144:16, 185:1 captured [12] - 50:22, 51:1, 51:3, 52:2, 83:22, 87:5, 94:8, 100:1, 130:19, 133:7, 133:12, 145:19 captures [1] - 123:8 capturing [3] - 11:22, 86:7, 128:20 card [1] - 175:11 care [3] - 215:9, 215:12 carefully [2] - 211:5, 212:6 CARES [2] - 6:13, 6:16 Carolyn [48] - 1:18, 16:2, 16:5, 16:19, 21:9, 22:6, 22:11, 23:16, 23:18, 23:22, 25:2, 25:4, 26:5, 32:21, 33:8, 37:9, 37:16, 43:7, 75:19, 96:4, 98:13, 98:17, 101:13, 102:2, 102:14, 103:18, 104:11, 104:25, 107:16, 108:16, 110:14, 110:24, 111:3, 111:16, 112:1, 141:2, 141:19, 142:14, 142:18, 148:2, 148:22, 159:18, 164:17, 164:18, 191:15, 195:5, 198:6, 200:1 CAROLYN [1] - 1:7 Carolyn_kidd.pdf [1] - 146:13 carried [1] - 141:1 carry [2] - 72:25, 133:5 case [37] - 5:4, 8:25, 9:2, 13:11, 26:3, 36:11, 57:24, 60:22, 63:13,
--	--	---	---	--

68:16, 72:1, 72:25, 76:25, 89:6, 99:3, 118:9, 124:18, 125:5, 126:10, 126:14, 127:12, 131:16, 133:13, 134:24, 152:20, 176:18, 176:20, 176:23, 176:25, 183:5, 203:13, 210:18, 213:2, 213:8, 213:15, 213:16 CASE [1] - 1:2 cases [9] - 8:24, 10:12, 34:16, 174:19, 175:10, 176:17, 213:7, 213:17, 215:9 caused [3] - 118:4, 125:16, 127:24 CB8B [3] - 67:23, 126:21, 139:21 cell [10] - 54:20, 136:1, 136:3, 168:13, 168:15, 168:20, 168:23, 186:6, 187:19, 207:20 cellular [2] - 203:20, 203:21 center [4] - 156:23, 181:17, 181:23, 182:9 certain [7] - 9:4, 13:4, 52:5, 74:19, 74:21, 75:4, 81:18 CERTIFICATE [1] - 217:2 certificate [11] - 84:9, 85:11, 85:14, 89:7, 90:9, 108:6, 108:11, 109:2, 111:18, 112:7, 156:16 certification [8] - 8:21, 20:13, 24:1, 28:25, 58:25, 59:9, 83:13, 93:17 certifications [16] - 5:1, 9:9, 18:23, 19:1, 23:2, 28:5, 28:7, 28:10, 30:10, 59:13, 61:1, 88:1, 91:19, 105:24, 110:13 certified [3] - 23:24, 61:19, 83:12 certify [9] - 8:25, 9:3, 12:20, 19:12,	20:15, 59:14, 59:15, 83:9, 217:4 certifying [3] - 9:5, 25:20, 28:22 cetera [1] - 133:24 challenge [1] - 3:7 chance [1] - 203:15 change [1] - 187:18 changed [4] - 120:3, 139:9, 139:10, 163:2 changes [7] - 52:9, 53:1, 53:6, 118:1, 139:14, 142:17, 142:21 changing [1] - 117:17 character [1] - 77:23 characterize [1] - 213:4 characters [16] - 67:22, 85:4, 85:12, 88:18, 91:12, 97:4, 105:13, 108:8, 126:20, 126:22, 139:21, 179:13, 179:16, 179:22, 180:10, 191:11 charged [2] - 6:1, 215:9 charges [1] - 213:22 charging [2] - 215:16, 216:5 Charlie [2] - 91:14, 165:17 check [7] - 44:20, 115:22, 171:12, 181:6, 181:20, 183:10, 192:19 checked [7] - 15:25, 18:12, 26:25, 27:11, 28:2, 31:12, 31:14 checking [2] - 171:11, 183:1 checks [8] - 177:8, 182:24, 183:1, 183:3, 183:4, 183:5, 183:6, 193:8 chemical [1] - 47:17 Chicago [1] - 202:5 choice [4] - 7:15, 7:19, 106:15, 160:19 chosen [1] - 6:18 Chrome [5] - 133:23, 135:20, 145:16, 145:17, 145:18 chronological [2] - 129:6, 141:15	circumstances [2] - 60:20, 74:19 civil [1] - 203:7 ckidd [5] - 116:21, 117:7, 118:10, 119:17, 120:11 ckidd1226 [1] - 122:8 ckidd1226@gmail. com [8] - 96:9, 99:3, 99:12, 108:17, 113:18, 116:17, 121:2, 121:25 clarify [1] - 16:23 clean [1] - 13:14 clear [4] - 17:22, 155:9, 168:10, 212:8 click [7] - 63:4, 153:20, 154:17, 154:22, 155:19, 156:2, 156:5 clicked [1] - 153:14 clicking [1] - 64:5 closed [1] - 160:18 closer [1] - 71:5 cloud [2] - 50:4, 55:20 club [1] - 212:20 code [25] - 54:5, 54:8, 54:12, 54:13, 54:15, 66:18, 66:19, 131:10, 131:13, 132:9, 136:8, 143:21, 144:6, 144:7, 151:7, 168:13, 168:20, 168:25, 169:3, 169:9, 169:19, 169:22, 169:25 codes [3] - 66:13, 66:14, 132:17 coding [2] - 47:20, 48:21 collaborating [2] - 172:14, 172:16 collect [4] - 21:23, 49:19, 49:21, 57:4 collected [4] - 49:17, 49:23, 50:1, 122:15 collecting [2] - 41:12, 100:18 collection [1] - 127:11 Colorado [1] - 211:20 column [66] - 27:19, 28:15, 28:17, 38:4, 66:7, 66:21, 66:23, 67:8, 77:7, 78:13, 86:6, 124:21,	125:7, 125:9, 125:12, 125:19, 125:21, 126:4, 126:8, 126:17, 128:3, 128:15, 128:19, 129:6, 129:8, 130:25, 131:2, 131:23, 131:24, 132:4, 132:10, 132:19, 133:4, 133:15, 133:17, 133:19, 135:1, 135:4, 135:13, 135:15, 136:1, 136:4, 136:5, 136:9, 137:10, 137:11, 137:13, 137:15, 137:17, 137:18, 137:21, 138:1, 139:18, 139:23, 139:24, 140:9, 141:11, 141:15, 142:20, 143:18, 144:9, 144:16, 144:19, 145:11, 145:14, 146:12 columns [5] - 17:18, 65:16, 127:12, 128:17, 139:8 combination [1] - 133:22 comfortable [1] - 106:23 coming [8] - 65:20, 65:21, 166:13, 167:20, 178:10, 187:13, 191:17, 203:16 commit [1] - 215:11 common [4] - 60:19, 112:23, 112:24, 176:20 commonly [2] - 4:16, 6:8 communicate [1] - 124:14 communicated [1] - 115:19 communicating [3] - 172:18, 172:19, 216:12 communication [1] - 211:6 communications [1] - 37:14 companies [3] - 45:23, 45:24, 175:12 company [10] - 18:7,	24:21, 43:4, 46:2, 46:7, 46:9, 81:9, 173:21, 175:23, 201:15 compare [2] - 179:9, 199:17 complete [8] - 24:23, 115:22, 157:8, 158:13, 159:11, 180:19, 200:24, 201:7 completed [6] - 72:17, 158:15, 164:24, 165:4, 181:9, 198:21 completely [1] - 157:13 completing [1] - 24:16 completion [12] - 84:9, 85:11, 85:14, 89:7, 90:9, 93:17, 108:6, 108:11, 109:2, 111:18, 112:7, 156:16 complied [1] - 30:24 component [9] - 56:13, 58:25, 104:11, 179:3, 181:6, 181:10, 192:12, 192:19, 192:22 computer [15] - 1:25, 78:4, 78:5, 78:22, 80:3, 81:13, 102:25, 103:2, 104:8, 123:17, 123:18, 133:24, 134:20, 154:1 computer-aided [1] - 1:25 computer-readable [1] - 133:24 computers [1] - 47:20 concerned [1] - 213:14 concerning [2] - 29:8, 164:19 concluded [1] - 213:2 conference [1] - 212:24 configuration [1] - 197:22 configure [1] - 155:16 configured [1] - 195:2 confirm [2] - 21:6,
--	--	--	---	--

29:4 confirms [1] - 209:21 Congress [6] - 6:5, 6:16, 7:1, 12:14, 13:11, 117:20 connect [1] - 55:10 connected [1] - 187:19 connection [5] - 49:17, 74:8, 74:13, 148:1, 176:24 consider [2] - 212:2, 213:9 consideration [1] - 25:22 considering [2] - 164:5, 211:10 consistent [4] - 68:20, 99:6, 134:23, 134:25 conspiracy [7] - 213:5, 213:9, 214:21, 214:25, 215:11, 216:5, 216:11 consultant [2] - 45:21, 45:22 consulting [3] - 4:24, 46:2, 50:11 consumable [1] - 124:17 contact [7] - 16:19, 23:21, 27:8, 30:18, 37:8, 117:20, 149:13 contain [4] - 70:10, 91:19, 113:14, 140:17 contained [5] - 33:11, 69:23, 84:10, 136:21, 215:2 contains [2] - 77:1, 143:15 content [4] - 116:24, 120:6, 120:20, 120:22 context [2] - 10:2, 126:14 continue [7] - 63:4, 107:3, 116:23, 154:22, 161:14, 162:2, 164:11 control [1] - 213:19 Controls [1] - 183:14 controls [1] - 216:4 conversation [1] - 53:4 conversing [1] - 211:3	coordinate [1] - 71:25 coordinated [1] - 188:11 copy [10] - 55:21, 63:5, 75:7, 80:6, 82:1, 92:16, 112:17, 112:18, 115:3, 208:18 corner [2] - 130:9, 181:8 Coronavirus [2] - 6:11, 19:19 correct [142] - 15:7, 15:17, 16:8, 24:5, 28:24, 31:2, 35:13, 36:24, 37:6, 37:7, 37:10, 37:12, 37:17, 37:18, 37:23, 37:24, 38:2, 38:9, 38:12, 38:15, 38:21, 38:25, 40:6, 40:7, 41:3, 41:6, 41:8, 41:10, 41:17, 41:21, 41:24, 42:2, 42:5, 42:15, 52:4, 54:18, 56:9, 56:11, 57:10, 57:11, 60:12, 60:14, 62:19, 64:13, 66:6, 68:9, 68:19, 68:23, 68:25, 74:19, 76:18, 78:7, 79:2, 79:6, 79:16, 80:2, 80:13, 81:4, 82:23, 91:25, 92:15, 93:13, 98:13, 103:7, 103:12, 105:5, 105:22, 106:2, 110:9, 110:11, 113:1, 114:6, 116:3, 118:13, 121:9, 124:9, 125:5, 128:12, 132:1, 133:2, 135:2, 137:20, 138:21, 143:24, 147:19, 148:14, 148:19, 149:16, 150:5, 150:9, 150:16, 152:6, 153:4, 155:14, 158:3, 158:21, 160:7, 165:1, 165:5, 166:10, 166:15, 168:2, 168:11, 168:12, 168:15, 168:22, 169:2, 169:8, 169:11,	170:4, 170:7, 178:7, 180:20, 182:1, 183:24, 184:22, 186:5, 186:19, 187:2, 187:24, 189:10, 189:12, 189:20, 190:6, 190:9, 191:10, 194:18, 195:7, 195:22, 196:13, 196:16, 196:18, 197:5, 198:9, 199:7, 201:16, 207:13, 207:15, 208:1, 208:2, 208:5, 217:4 corrected [1] - 103:3 correction [2] - 78:19, 103:11 correctly [2] - 152:16, 194:2 cost [3] - 4:23, 32:2, 33:2 costs [2] - 18:12, 28:2 counsel [1] - 211:2 Counsel [1] - 214:24 count [2] - 130:8, 135:14 Count [3] - 214:19, 216:7 counties [1] - 4:15 country [4] - 6:25, 178:20, 191:24, 198:13 couple [3] - 10:25, 89:2, 95:14 couple's [1] - 56:14 course [2] - 7:23, 63:15 COURT [106] - 1:1, 3:2, 3:11, 3:14, 3:16, 3:23, 14:10, 14:21, 14:24, 15:9, 15:17, 31:9, 33:25, 34:2, 34:8, 36:16, 44:22, 44:24, 45:1, 45:3, 45:5, 95:3, 95:5, 106:8, 106:13, 106:22, 106:25, 107:3, 147:13, 160:14, 160:17, 160:22, 160:25, 161:4, 161:7, 161:12, 161:18, 161:23, 162:1, 162:8, 162:12, 162:15, 162:19, 162:21, 163:4, 163:6,	163:10, 163:16, 163:20, 163:24, 164:8, 166:22, 168:4, 168:7, 169:12, 169:16, 170:24, 171:16, 171:19, 172:1, 172:11, 172:16, 172:18, 172:24, 173:3, 173:5, 173:22, 193:12, 194:16, 194:19, 200:18, 201:19, 201:22, 201:24, 202:4, 202:6, 202:9, 202:13, 209:15, 210:8, 210:11, 210:15, 210:22, 211:5, 211:15, 211:17, 211:23, 212:4, 212:15, 212:18, 212:20, 213:25, 214:4, 214:10, 214:13, 214:16, 214:18, 214:20, 214:23, 215:5, 215:10, 215:14, 215:21, 216:1, 216:12, 216:18 court [4] - 91:17, 173:6, 174:1, 203:9 Court [18] - 1:21, 1:22, 3:1, 14:6, 64:20, 95:1, 161:1, 161:2, 163:7, 172:22, 210:25, 211:13, 212:1, 212:2, 214:22, 217:8, 217:8 Court's [5] - 14:8, 172:2, 172:6, 212:11, 216:3 courthouse [1] - 160:18 COURTROOM [4] - 3:25, 45:9, 173:8, 202:16 cover [1] - 30:11 covered [1] - 31:24 COVID-19 [1] - 5:17 create [10] - 11:21, 53:23, 53:25, 55:1, 55:3, 149:23, 149:24, 149:25, 150:9, 179:18 created [15] - 6:3, 6:11, 6:15, 6:23, 7:3, 20:6, 47:25, 72:5, 72:10, 92:16,	99:19, 100:2, 126:10, 129:12, 136:25 creating [1] - 20:6 creation [2] - 127:18, 127:19 credentials [1] - 151:5 credit [1] - 175:11 criminal [3] - 201:3, 201:9, 203:7 criteria [1] - 5:15 cross [11] - 115:15, 116:11, 147:12, 162:9, 170:2, 194:20, 200:18, 202:7, 202:10, 210:9, 210:10 Cross [3] - 2:4, 2:6, 2:9 CROSS [3] - 34:9, 147:15, 200:19 cross-examination [4] - 170:2, 200:18, 210:9, 210:10 Cross-Examination [3] - 2:4, 2:6, 2:9 CROSS-EXAMINATION [3] - 34:9, 147:15, 200:19 cross-reference [1] - 116:11 cross-referencing [1] - 115:15 current [2] - 128:1, 128:8 customer [12] - 70:20, 70:22, 98:25, 174:15, 174:16, 174:17, 175:18, 176:2, 176:18, 176:22, 183:3, 203:4 customers [13] - 46:22, 174:8, 174:17, 175:4, 175:6, 175:8, 175:9, 175:15, 175:16, 175:20, 175:25, 182:2, 203:22 cut [1] - 163:17 CW [4] - 20:12, 21:15, 106:4, 110:16
--	--	--	---	--

D	DAVID [1] - 1:13 Davie [2] - 22:13, 23:20 DAY [1] - 1:7 days [5] - 210:19, 212:24, 213:15, 214:8, 216:20 DBA [1] - 16:3 deal [11] - 68:6, 68:12, 68:15, 73:5, 74:8, 74:13, 97:11, 100:5, 100:7, 102:14 deals [3] - 68:16, 68:18, 97:14 debit [1] - 175:11 decades [1] - 6:18 decide [1] - 216:16 decided [1] - 213:21 decision [2] - 8:18, 163:2 decisions [2] - 5:14, 5:15 declared [1] - 5:4 declaring [1] - 28:22 declined [1] - 97:15 default [1] - 13:2 Defendants [1] - 1:8 DEFENDANTS [1] - 1:15 defense [9] - 14:16, 15:15, 45:1, 89:6, 201:22, 211:2, 212:4, 216:2 define [1] - 40:11 defined [1] - 167:10 definitely [2] - 165:22, 165:25 delete [1] - 127:25 delivered [5] - 157:2, 158:12, 159:10, 164:23 Delivered [1] - 157:6 Delta [2] - 85:6, 88:16 delta [1] - 85:13 demonstrate [5] - 153:25, 154:2, 154:3, 154:4, 154:7 DENISE [1] - 1:7 Denver [1] - 211:20 Department [1] - 19:17 depicted [5] - 16:14, 17:18, 19:4, 21:17, 27:17 DEPUTY [4] - 3:25, 45:9, 173:8, 202:16 deputy [1] - 4:13 describe [10] - 5:7, 8:23, 18:16, 23:24, 25:12, 31:12, 115:19, 127:10, 142:10, 204:8 described [4] - 5:25, 16:14, 28:8, 60:19 describes [2] - 131:3, 133:22 describing [1] - 121:13 design [6] - 47:18, 48:1, 48:4, 48:7, 48:20, 49:1 designed [4] - 12:11, 12:19, 13:7, 57:24 desktop [2] - 134:20, 196:6 detail [13] - 72:14, 73:11, 77:5, 77:15, 78:11, 99:23, 105:25, 187:1, 189:6, 195:13, 195:20, 200:2, 205:3 detailed [1] - 184:5 details [5] - 69:22, 100:22, 104:18, 153:11, 171:13 determine [4] - 159:16, 165:23, 183:3, 188:20 developing [1] - 47:4 development [2] - 176:8, 176:10 device [41] - 51:4, 51:15, 51:17, 51:18, 51:20, 51:24, 63:8, 133:25, 134:1, 134:2, 134:4, 138:19, 144:19, 145:11, 145:15, 146:19, 147:3, 147:9, 168:16, 180:14, 183:18, 184:13, 184:24, 185:2, 186:13, 186:22, 187:19, 196:4, 196:19, 196:21, 197:2, 197:6, 197:10, 197:14, 197:18, 200:14, 206:24, 207:3, 208:9, 209:6, 209:8 devices [4] - 167:7, 187:18, 203:22, 207:5 DFB7 [1] - 97:5 different [58] - 23:13, 40:25, 60:23, 68:9, 68:15, 68:22, 78:8, 78:17, 79:7, 88:22, 88:23, 88:24, 88:25, 89:23, 91:10, 92:5, 94:22, 97:14, 99:5, 99:7, 101:6, 101:18, 103:8, 103:10, 109:16, 109:18, 109:21, 109:22, 109:24, 120:3, 120:21, 124:17, 125:4, 131:8, 136:24, 138:7, 138:19, 139:8, 141:2, 142:12, 148:9, 160:6, 160:9, 167:7, 174:19, 174:20, 175:9, 175:15, 175:16, 175:19, 176:11, 180:2, 183:1, 191:8, 199:10, 206:8, 207:5, 208:4 differently [1] - 39:24 difficult [2] - 12:11, 12:19 digital [2] - 59:19, 155:1 digits [2] - 101:14, 208:9 DION [2] - 2:10, 202:15 Dion [2] - 202:14, 202:18 DIRECT [4] - 4:5, 45:13, 173:12, 202:20 direct [10] - 5:3, 5:17, 23:23, 25:9, 33:22, 37:8, 161:25, 166:3, 200:17, 210:7 Direct [4] - 2:4, 2:6, 2:8, 2:10 directed [1] - 63:2 directing [5] - 15:22, 18:14, 19:24, 20:13, 85:7 directive [1] - 12:16 directly [5] - 7:11, 35:6, 72:24, 94:23, 173:23 director [1] - 4:13 disagree [1] - 159:4 disaster [1] - 6:1 disasters [2] - 4:22, 5:4 disbursed [2] - 26:17, 31:17 disbursement [2] - 26:13, 26:16 discuss [2] - 210:18, 212:7 discussed [2] - 164:19, 216:15 discussion [2] - 161:10, 213:1 displayed [8] - 25:24, 132:22, 140:24, 177:15, 178:10, 178:18, 181:2, 182:22 displaying [1] - 15:11 distinct [1] - 27:23 DISTRICT [3] - 1:1, 1:1, 1:11 District [3] - 1:22, 217:8, 217:9 district [2] - 4:11, 4:13 divide [6] - 10:22, 17:20, 27:19, 27:20, 38:10, 38:13 divided [2] - 17:24, 18:5 Division [1] - 19:19 DL [2] - 178:20, 191:24 DOB [2] - 67:8, 96:18 document [85] - 11:4, 11:6, 14:15, 21:14, 22:2, 22:7, 23:5, 25:15, 25:25, 30:11, 30:13, 32:9, 56:2, 56:3, 57:20, 61:10, 63:6, 63:13, 64:3, 73:5, 74:11, 75:8, 75:21, 75:23, 76:24, 77:2, 77:18, 77:20, 77:24, 77:25, 78:1, 82:13, 83:11, 83:21, 84:8, 86:2, 86:8, 88:25, 89:5, 92:19, 94:10, 94:14, 95:14, 101:18, 102:12, 102:23, 103:6, 103:19, 103:22, 107:8, 109:18, 119:7, 119:11, 119:12, 120:1, 121:7, 125:2, 137:22, 138:16, 142:6, 143:10, 146:16, 146:17, 146:18, 146:20, 146:22, 151:21, 154:5, 154:22,
----------	--

154:25, 155:17, 156:5, 156:7, 156:14, 156:17, 170:17, 171:4, 187:1, 195:9, 195:12, 195:20, 209:10, 215:25 documentation [2] - 14:1, 22:8 documents [53] - 9:17, 9:18, 9:22, 11:5, 13:20, 14:6, 14:24, 20:17, 21:7, 23:13, 25:17, 29:6, 49:21, 49:23, 50:15, 52:14, 52:18, 55:8, 56:16, 58:21, 58:23, 59:6, 59:11, 64:15, 73:17, 74:4, 74:10, 76:23, 80:16, 81:14, 83:14, 85:2, 93:14, 94:8, 94:15, 94:19, 94:25, 99:4, 101:4, 101:22, 108:18, 109:3, 111:6, 112:10, 120:23, 146:9, 146:12, 159:17, 159:25, 164:18, 187:7, 188:25, 216:9 DocuSign [60] - 25:10, 43:22, 44:3, 44:7, 59:20, 61:15, 61:24, 62:25, 63:2, 63:3, 63:10, 64:2, 64:7, 82:24, 83:22, 83:23, 84:5, 84:8, 84:9, 84:23, 85:5, 87:5, 88:5, 88:8, 88:14, 88:18, 88:22, 89:1, 91:8, 91:24, 92:9, 92:19, 93:6, 93:8, 93:18, 93:21, 106:6, 107:24, 108:11, 108:19, 110:16, 111:6, 111:9, 118:5, 118:17, 120:23, 152:10, 153:9, 153:10, 153:11, 153:14, 154:4, 154:19, 154:20, 156:15, 157:23, 164:15, 171:3 DocuSigned [11] - 82:19, 82:21, 91:22, 92:4, 92:6, 94:16, 105:16,	111:13, 111:15, 118:15, 121:8 DocuSigning [2] - 60:25, 120:7 dollar [1] - 40:25 dollars [3] - 10:15, 11:1, 38:8 domain [3] - 48:18, 53:17, 151:13 DONALD [1] - 1:10 done [27] - 5:13, 46:2, 52:6, 53:17, 53:23, 63:7, 70:21, 78:4, 81:7, 81:8, 88:5, 95:16, 104:13, 108:24, 112:4, 127:23, 137:1, 138:18, 161:25, 163:18, 164:25, 165:20, 168:18, 176:13, 179:4, 189:9, 208:11 DoorDash [1] - 175:12 DoorDasher [1] - 174:20 dots [1] - 18:15 down [17] - 6:25, 22:16, 27:5, 28:15, 29:23, 55:15, 79:23, 89:2, 91:17, 106:13, 151:16, 155:3, 155:4, 174:2, 189:5, 190:17, 207:25 download [2] - 55:17, 58:21 drafting [1] - 216:4 Draw [1] - 31:14 draw [2] - 63:8, 155:19 drawing [1] - 32:19 driver's [2] - 178:20, 191:24 dropping [5] - 18:10, 22:16, 27:5, 28:15, 29:23 DS [2] - 83:18, 83:22 duly [4] - 3:24, 45:8, 173:7, 202:15 during [20] - 5:20, 21:23, 50:22, 75:2, 82:22, 94:15, 99:9, 112:12, 122:15, 145:19, 155:17, 170:2, 172:13, 172:20, 176:21, 183:19, 188:18, 189:2, 196:11,	209:11 E e-sign [1] - 25:16 earliest [1] - 114:22 earn [1] - 10:14 earned [2] - 10:13, 56:14 ease [1] - 25:18 easily [2] - 154:14 easy [2] - 49:6, 124:19 Echo [1] - 88:20 Economic [3] - 6:12, 19:20 Edge [1] - 134:23 educational [1] - 47:13 effect [4] - 19:15, 26:15, 28:14, 59:12 effective [2] - 207:7, 207:11 eight [6] - 85:6, 85:13, 88:16, 165:17, 190:8, 190:25 either [19] - 48:21, 50:10, 51:2, 53:17, 56:3, 63:6, 63:7, 114:16, 114:18, 127:23, 127:24, 130:20, 131:5, 155:19, 168:16, 175:13, 187:20, 191:20 elapsed [1] - 170:7 electronic [3] - 25:14, 25:15, 84:10 electronically [2] - 25:17, 94:7 eligibility [1] - 29:5 eligible [7] - 9:1, 10:8, 11:1, 19:15, 21:6, 28:13, 33:17 ELMO [3] - 37:2, 37:3, 164:17 email [105] - 16:19, 37:14, 51:2, 53:24, 54:1, 54:3, 54:5, 54:10, 54:12, 54:13, 54:15, 54:24, 63:1, 63:3, 63:19, 63:21, 63:22, 64:1, 64:2, 64:9, 64:10, 65:18, 65:22, 66:4, 66:17, 66:19, 70:24, 71:3, 85:24, 86:1, 86:9,	86:10, 89:12, 93:23, 96:6, 96:8, 96:14, 96:25, 99:12, 108:16, 108:18, 112:1, 112:13, 112:20, 112:21, 112:22, 112:24, 113:14, 113:16, 113:19, 114:11, 114:16, 114:18, 114:20, 114:21, 115:16, 115:20, 116:1, 116:20, 116:21, 116:25, 117:1, 117:7, 117:11, 117:15, 118:9, 118:10, 118:14, 118:23, 119:4, 119:6, 119:11, 119:17, 120:11, 120:23, 121:13, 121:25, 122:3, 130:21, 131:1, 131:5, 131:6, 131:15, 143:16, 143:20, 143:22, 145:8, 150:6, 150:8, 150:20, 150:22, 150:24, 152:18, 152:21, 152:24, 153:1, 153:9, 153:19, 167:13, 167:21, 167:24, 168:25, 169:1 emails [8] - 71:1, 112:13, 112:15, 112:16, 112:18, 114:1, 115:23, 116:1 embed [1] - 176:11 embedded [1] - 176:15 employed [2] - 59:18, 202:24 employee [7] - 10:6, 10:7, 10:14, 39:1, 40:22, 46:4, 105:8 employees [20] - 6:24, 7:4, 12:18, 27:12, 31:19, 31:21, 31:23, 32:6, 32:22, 33:8, 38:24, 39:8, 39:16, 39:22, 40:15, 40:20, 40:24, 87:21, 91:4, 105:8 employer [2] - 16:15, 16:21	employment [1] - 50:10 en [1] - 14:21 enable [1] - 117:24 encounter [1] - 62:16 end [25] - 41:18, 129:4, 134:13, 139:3, 141:19, 144:2, 145:4, 161:15, 163:25, 164:1, 174:8, 174:18, 175:12, 175:13, 175:22, 176:7, 176:19, 176:22, 177:22, 178:22, 179:7, 179:22, 205:12, 205:24, 206:10 ended [2] - 88:15, 196:12 ending [35] - 72:7, 92:9, 107:25, 109:17, 111:21, 129:11, 129:18, 138:2, 138:5, 138:12, 141:21, 141:23, 142:23, 143:2, 143:4, 143:5, 146:10, 146:14, 146:25, 165:17, 166:5, 166:11, 166:12, 167:20, 185:11, 185:16, 185:19, 186:8, 186:11, 186:20, 190:10, 194:18, 207:6, 207:12, 208:22 ends [13] - 71:17, 71:18, 99:21, 132:1, 142:2, 185:7, 185:8, 185:24, 186:15, 189:8, 191:12, 196:3, 208:10 engineering [4] - 47:14, 47:15, 47:16, 47:17 enjoy [1] - 106:25 enlarge [4] - 15:23, 19:8, 22:5, 108:5 enlarged [7] - 18:17, 85:9, 97:10, 105:10, 107:13, 107:14, 108:14 ensure [1] - 179:10 enter [6] - 54:13, 57:18, 77:5, 132:11, 132:15, 151:3
---	--	--	---	---

entered ^[15] - 3:15, 34:7, 58:15, 58:19, 77:3, 78:8, 78:16, 80:1, 82:8, 104:7, 107:2, 140:7, 163:23, 171:5, 178:22 entering ^[4] - 77:9, 77:11, 77:12, 191:20 entertain ^[1] - 212:5 entertained ^[1] - 213:1 entire ^[3] - 25:19, 114:19, 156:11 entitled ^[1] - 217:5 entranceway ^[1] - 204:11 entrepreneurs ^[1] - 4:21 entries ^[1] - 166:13 envelope ^[21] - 84:23, 85:5, 85:12, 88:14, 88:19, 88:22, 89:8, 91:8, 92:9, 93:9, 93:13, 105:11, 107:24, 108:8, 109:17, 109:18, 111:7, 111:21, 156:21, 156:24, 156:25 environment ^[2] - 8:8, 62:10 equivalent ^[1] - 127:13 especially ^[1] - 187:17 ESQ ^[2] - 1:16, 1:17 essentially ^[2] - 71:25, 74:17 establish ^[1] - 74:17 established ^[4] - 16:6, 16:8, 27:3, 150:13 estimate ^[1] - 169:24 estimated ^[1] - 8:5 et ^[1] - 133:24 evening ^[1] - 210:19 event ^[13] - 85:1, 85:20, 88:23, 89:8, 93:18, 94:15, 108:12, 111:25, 137:13, 137:15, 160:5, 203:8, 211:24 events ^[23] - 85:17, 86:7, 108:5, 108:15, 108:24, 111:23, 136:20, 136:21, 136:24,	137:5, 138:4, 138:9, 138:15, 143:11, 145:22, 156:20, 156:21, 156:23, 156:24, 156:25, 159:24, 160:2 eventually ^[4] - 140:2, 140:3, 152:7, 152:8 evidence ^[29] - 15:1, 15:7, 64:21, 69:14, 73:14, 75:11, 75:16, 76:11, 76:19, 79:10, 80:19, 81:21, 87:11, 90:14, 90:15, 100:12, 100:25, 103:13, 104:19, 109:11, 122:22, 177:12, 187:10, 191:6, 197:24, 197:25, 204:23, 215:1, 215:2 exact ^[4] - 169:22, 169:23, 214:8, 216:10 exactly ^[7] - 6:5, 100:24, 148:11, 149:8, 153:16, 154:3, 154:25 examination ^[4] - 170:2, 200:18, 210:9, 210:10 Examination ^[8] - 2:4, 2:4, 2:6, 2:6, 2:7, 2:8, 2:9, 2:10 EXAMINATION ^[8] - 4:5, 34:9, 45:13, 147:15, 168:8, 173:12, 200:19, 202:20 example ^[13] - 41:4, 51:20, 60:23, 97:18, 134:7, 141:14, 144:22, 170:13, 175:11, 176:20, 180:17, 187:21, 196:1 examples ^[3] - 68:24, 69:7, 118:3 Excel ^[17] - 123:19, 123:20, 123:24, 124:4, 124:18, 125:2, 129:13, 130:15, 136:11, 140:22, 140:25, 142:6, 143:10, 159:21, 165:12,	208:4, 208:5 except ^[2] - 95:16, 99:3 excess ^[1] - 215:17 excusal ^[3] - 171:16, 201:22, 210:11 excuse ^[9] - 11:17, 21:5, 24:11, 44:1, 45:2, 148:8, 150:2, 154:10, 166:9 excused ^[7] - 44:24, 45:3, 45:5, 106:11, 171:19, 201:21, 201:24 executive ^[1] - 19:14 exhibit ^[5] - 14:25, 80:15, 120:16, 190:5, 208:25 Exhibit ^[100] - 14:25, 15:2, 15:11, 18:13, 21:3, 21:16, 22:1, 22:19, 23:5, 25:24, 26:3, 26:19, 27:24, 28:3, 29:2, 29:11, 29:15, 30:13, 30:22, 32:5, 32:9, 32:19, 33:7, 37:2, 64:21, 64:22, 69:14, 70:8, 70:14, 73:13, 75:10, 76:11, 76:19, 76:22, 79:9, 80:19, 81:21, 83:3, 83:24, 84:20, 87:10, 87:16, 88:1, 90:14, 92:1, 92:8, 95:11, 98:19, 98:20, 100:12, 100:25, 101:16, 102:4, 102:16, 103:13, 104:19, 104:22, 105:23, 107:8, 108:1, 109:11, 110:3, 113:5, 113:6, 115:9, 116:4, 116:12, 116:21, 117:2, 118:19, 119:5, 120:16, 122:23, 125:2, 130:10, 130:11, 136:12, 139:2, 140:13, 140:19, 140:20, 142:4, 152:15, 159:7, 177:13, 181:2, 181:13, 187:8, 187:25, 195:17, 197:24, 204:20, 206:16, 206:17, 206:18,	208:12, 208:13, 209:17, 209:18 Exhibits ^[2] - 90:22, 214:6 exhibits ^[7] - 14:7, 14:12, 14:18, 15:5, 91:20, 113:7, 152:13 exist ^[1] - 47:22 existed ^[1] - 127:16 existing ^[3] - 6:19, 8:7, 12:3 exited ^[4] - 34:5, 106:12, 161:17, 210:21 expand ^[1] - 189:16 expanded ^[5] - 189:14, 189:19, 189:21, 191:16, 195:24 expediency ^[1] - 195:8 experience ^[5] - 6:19, 53:10, 63:10, 63:11, 174:24 expired ^[2] - 169:7, 183:2 explain ^[3] - 124:12, 151:10, 179:6 explains ^[1] - 14:17 explanation ^[1] - 193:23 export ^[7] - 124:12, 124:15, 128:2, 128:12, 139:7, 165:15 exported ^[3] - 124:10, 128:4, 128:6 extent ^[1] - 116:24 extract ^[5] - 78:1, 182:15, 194:1, 194:7, 194:14 extracted ^[4] - 77:18, 77:21, 124:6, 178:13	failed ^[16] - 192:9, 193:2, 193:6, 193:7, 193:21, 193:23, 194:1, 194:4, 194:6, 194:7, 194:12, 195:4, 195:6, 197:20, 199:15, 199:17 failing ^[1] - 198:19 fails ^[2] - 192:12, 195:1 fair ^[10] - 34:25, 43:23, 47:19, 55:13, 128:20, 147:23, 156:8, 167:2, 193:9, 215:23 fairppp.com ^[1] - 117:21 false ^[12] - 20:19, 22:24, 30:7, 33:11, 33:15, 33:20, 131:24, 144:14, 215:1, 215:3, 216:8, 216:9 familiar ^[38] - 7:5, 9:25, 10:2, 13:25, 14:3, 25:10, 43:11, 43:13, 43:15, 43:19, 47:1, 47:19, 48:9, 49:7, 49:10, 49:13, 49:16, 50:5, 50:7, 51:12, 58:24, 61:24, 62:5, 83:2, 83:5, 119:2, 121:16, 121:18, 122:20, 129:13, 174:25, 175:3, 175:23, 176:8, 177:10, 203:10, 203:12, 204:25 familiarity ^[2] - 25:12, 26:19 fancy ^[1] - 126:12 far ^[15] - 49:1, 59:25, 68:1, 98:7, 123:14, 128:18, 129:10, 163:1, 176:4, 189:25, 198:10, 198:16, 206:12, 213:10, 213:23 fashion ^[1] - 7:16 fast ^[2] - 12:15, 196:24 Fast ^[13] - 43:11, 113:22, 114:1, 114:4, 117:23, 151:10, 151:11, 151:12, 151:20,
F				
face ^[3] - 154:18, 179:9 faces ^[2] - 172:13, 211:4 facilitate ^[1] - 7:23 fact ^[10] - 28:13, 99:6, 157:16, 187:17, 190:7, 200:23, 201:6, 206:1, 212:7, 213:16				

151:23, 151:24, 152:1 FCRR [2] - 1:21, 217:7 February [5] - 12:9, 76:6, 76:9, 76:13, 101:12 FED [1] - 186:9 federal [4] - 4:20, 4:25, 13:2, 160:18 federally [1] - 20:25 fee [1] - 210:3 felt [1] - 58:2 few [9] - 68:20, 166:11, 168:5, 172:21, 175:7, 201:2, 210:19, 212:21, 212:24 fifteen [2] - 54:8, 151:1 file [12] - 57:1, 58:23, 79:6, 79:7, 101:6, 136:25, 137:23, 146:2, 146:7, 146:12, 151:5 files [3] - 79:3, 79:5, 138:6 filing [1] - 29:16 fill [8] - 39:9, 40:9, 40:16, 40:17, 41:22, 57:4, 58:1, 63:22 filled [2] - 56:25, 82:2 filling [3] - 58:14, 117:21, 151:24 filter [5] - 124:16, 129:17, 129:25, 135:3, 137:10 filtered [7] - 129:15, 130:3, 130:4, 130:17, 135:6, 135:8, 135:22 filtering [4] - 135:3, 138:1, 138:2, 138:12 Finance [1] - 32:15 finance [2] - 5:2, 8:12 Financial [1] - 183:14 financial [11] - 5:3, 5:7, 5:11, 5:25, 46:18, 46:19, 46:22, 55:18, 80:25, 81:1, 183:10 fine [9] - 20:22, 20:24, 21:1, 45:18, 65:3, 95:8, 106:22, 164:6, 212:12 finish [4] - 163:15, 164:10, 167:17, 194:20	finished [1] - 106:20 first [69] - 3:9, 3:20, 18:15, 18:19, 19:9, 22:18, 31:15, 42:10, 42:14, 42:24, 53:14, 53:16, 61:13, 65:16, 66:25, 93:14, 114:14, 117:22, 128:13, 128:14, 129:3, 130:16, 131:25, 135:21, 136:14, 137:2, 137:4, 137:18, 140:4, 141:14, 141:17, 141:18, 149:21, 149:23, 153:15, 153:17, 153:21, 154:17, 155:7, 165:11, 166:4, 169:20, 170:19, 172:25, 173:4, 180:5, 182:2, 183:23, 188:13, 189:1, 189:24, 189:25, 190:15, 192:22, 193:5, 194:23, 196:1, 196:3, 196:5, 198:19, 198:23, 200:11, 201:2, 201:11, 202:18, 205:9, 208:17, 213:12 First [1] - 31:14 fit [1] - 208:6 five [6] - 20:22, 39:8, 40:24, 88:20, 197:8, 213:15 flexible [1] - 57:24 flight [1] - 162:4 FLORIDA [1] - 1:1 Florida [11] - 1:3, 1:23, 4:11, 16:11, 22:13, 23:20, 27:6, 162:24, 187:22, 217:9, 217:9 flow [3] - 176:15, 180:15, 191:19 flown [1] - 161:20 focusing [1] - 56:21 following [4] - 39:25, 172:4, 173:6, 215:14 foot [1] - 95:9 FOR [1] - 1:12 foregoing [1] - 217:4 forgivable [4] - 13:7, 13:8, 13:10, 13:12	forgiven [5] - 13:14, 26:2, 32:11, 33:17, 33:19 forgiveness [11] - 13:22, 23:7, 23:15, 30:15, 31:2, 31:20, 31:22, 32:25, 121:15, 121:17, 121:20 form [52] - 19:13, 20:6, 24:23, 24:24, 24:25, 25:1, 26:20, 30:2, 35:18, 36:21, 36:22, 36:24, 37:19, 39:9, 39:15, 40:8, 40:9, 40:16, 41:10, 41:13, 43:9, 43:17, 55:9, 55:12, 56:25, 57:5, 57:9, 57:13, 63:5, 63:13, 77:3, 77:13, 78:2, 78:18, 78:22, 79:21, 79:24, 82:4, 82:9, 90:18, 93:12, 105:21, 107:23, 108:12, 117:21, 152:3, 153:20, 155:1, 155:2, 159:1, 159:4 Form [35] - 12:1, 13:17, 15:20, 23:6, 30:14, 56:22, 57:3, 58:24, 60:25, 61:9, 62:21, 69:7, 69:11, 82:1, 82:9, 82:12, 85:15, 87:14, 87:25, 90:10, 90:19, 90:21, 91:8, 93:14, 98:6, 104:23, 107:21, 109:16, 110:2, 110:6, 110:12, 110:13, 111:19, 118:7, 118:14 format [4] - 123:9, 124:11, 124:17, 127:12 formation [1] - 10:3 forms [5] - 14:3, 20:17, 107:21, 110:15, 169:2 Fort [1] - 16:11 forth [1] - 188:21 forward [1] - 3:23 forwarding [1] - 168:17 foundation [2] - 14:14, 15:3 four [23] - 4:22, 67:22, 85:4, 85:12,	88:18, 91:12, 97:4, 105:13, 108:8, 126:20, 126:22, 179:25, 180:4, 190:21, 191:12, 192:9, 193:15, 195:3, 195:4, 195:5, 197:4, 198:16, 208:9 fourth [1] - 194:11 FPR [2] - 1:21, 217:7 FPR-C [2] - 1:21, 217:7 framework [2] - 6:20, 8:7 Francisco [1] - 46:1 fraud [4] - 215:9, 215:12 fraudulent [1] - 34:17 Friday [1] - 160:20 friend [1] - 24:23 front [5] - 15:12, 44:8, 107:9, 182:13, 182:18 functionality [1] - 171:12 fund [6] - 8:18, 10:23, 35:10, 38:4, 39:1, 98:1 funded [15] - 6:6, 22:25, 30:8, 31:16, 69:2, 69:3, 73:11, 74:9, 74:14, 92:23, 97:15, 97:23, 100:10, 102:14, 117:19 funding [4] - 6:19, 11:8, 60:8, 80:23 funds [9] - 12:18, 13:12, 33:3, 42:25, 43:1, 55:11, 56:6, 80:24, 102:13 Funeral [3] - 75:15, 214:2, 214:7	generate [1] - 165:21 generated [6] - 101:8, 124:7, 156:15, 169:9, 169:19, 205:3 gentlemen [12] - 3:2, 3:16, 14:11, 34:3, 160:14, 160:17, 161:16, 163:24, 171:16, 210:16, 212:10, 216:19 given [2] - 127:11, 175:16 glare [1] - 193:2 Gmail [1] - 120:14 GMT [1] - 188:8 gov [12] - 182:15, 183:1, 193:15, 194:4, 194:11, 195:3, 198:15, 198:19, 198:20, 199:15, 199:18, 199:21 GOVERNMENT [1] - 1:12 Government [217] - 3:24, 5:1, 12:16, 13:2, 14:7, 14:13, 14:16, 14:25, 15:1, 15:11, 18:13, 21:3, 21:16, 22:1, 22:18, 23:5, 25:24, 26:3, 26:19, 27:24, 28:3, 29:2, 29:11, 29:15, 30:13, 30:22, 32:5, 32:9, 32:19, 33:7, 37:1, 45:8, 64:20, 64:22, 69:14, 70:8, 70:14, 73:13, 75:10, 76:10, 76:19, 76:22, 79:9, 80:19, 81:20, 83:3, 83:24, 84:20, 85:15, 87:10, 87:11, 87:16, 87:25, 88:7, 88:15, 89:4, 89:25, 90:14, 90:21, 91:18, 92:8, 92:25, 93:16, 95:11, 95:12, 98:8, 98:9, 98:19, 98:20, 100:7, 100:25, 101:9, 101:16, 102:4, 102:8, 102:16, 103:16, 104:19, 104:22, 105:10, 105:23, 107:7, 107:23, 108:1, 108:12, 109:11, 109:14,
G				
G998U [2] - 136:2, 186:24 gain [1] - 204:11 Galaxy [2] - 207:24, 209:9 gateway [1] - 204:10 gather [1] - 29:12 general [1] - 62:25 generally [7] - 5:8, 49:11, 83:2, 154:4, 166:15, 175:7, 203:10				

110:1, 110:3, 110:18, 111:2, 111:17, 113:5, 113:6, 113:17, 114:25, 115:8, 115:11, 115:15, 116:4, 116:11, 116:21, 117:2, 117:13, 118:19, 118:24, 118:25, 119:5, 119:15, 119:20, 119:23, 120:5, 120:16, 121:10, 122:7, 122:22, 122:23, 125:2, 130:10, 130:11, 130:19, 134:8, 136:12, 136:22, 139:2, 140:12, 140:19, 140:20, 141:12, 142:4, 143:7, 146:1, 147:11, 152:15, 160:12, 165:9, 165:19, 173:7, 177:13, 178:6, 178:13, 178:18, 178:19, 178:21, 179:2, 179:8, 179:10, 180:4, 181:1, 181:13, 182:5, 182:11, 182:14, 182:22, 182:25, 185:17, 187:8, 187:25, 188:6, 189:6, 189:19, 189:23, 190:18, 190:24, 191:5, 191:16, 191:20, 191:21, 191:23, 192:1, 192:3, 192:4, 192:5, 192:10, 192:12, 192:25, 193:1, 193:4, 193:5, 193:17, 193:22, 194:3, 194:5, 194:9, 195:16, 197:24, 198:8, 198:12, 199:14, 200:3, 200:5, 202:15, 203:13, 204:20, 204:22, 205:14, 205:15, 206:5, 206:15, 206:17, 206:18, 207:1, 207:16, 207:17, 208:12, 208:13, 208:24, 209:17, 209:18,	210:24, 211:19, 212:25, 213:19, 216:4 Government's [4] - 45:6, 165:7, 213:2, 214:6 GOVERNMENT'S [1] - 2:2 GPS [1] - 187:15 gradually [2] - 57:23, 58:1 GRAHAM [1] - 1:10 great [4] - 177:15, 210:19, 216:20 green [1] - 181:8 gross [24] - 17:6, 17:19, 18:7, 22:17, 27:14, 27:18, 29:24, 35:5, 42:17, 42:23, 43:3, 57:14, 77:2, 77:5, 77:15, 77:19, 78:10, 79:21, 82:12, 82:16, 87:19, 103:1, 105:1, 110:5 group [3] - 112:22, 114:1 grow [1] - 4:21 guarantee [1] - 5:9 guaranteed [4] - 7:18, 8:24, 13:1, 20:20 guarantees [1] - 5:2 guess [1] - 211:12	165:7, 177:14 head [2] - 174:15, 174:16 header [3] - 125:9, 125:23, 126:6 health [3] - 215:9, 215:11, 215:12 hear [2] - 56:10, 169:12 heard [5] - 34:23, 51:10, 56:22, 71:15, 214:15 hearing [1] - 215:4 heart [1] - 216:11 HELD [1] - 1:10 held [2] - 172:4, 173:6 help [13] - 4:20, 4:24, 5:2, 5:24, 7:23, 8:1, 34:20, 46:12, 46:21, 117:19, 174:18, 176:22 helped [1] - 176:5 helping [2] - 24:23, 150:3 helps [1] - 175:21 Hendrith [1] - 1:19 high [1] - 4:23 high-quality [1] - 4:23 highlight [8] - 19:25, 22:4, 25:9, 30:21, 135:13, 135:15, 144:22, 206:25 highlighted [6] - 16:13, 21:8, 31:11, 134:7, 134:15, 211:2 highlighting [5] - 21:3, 22:14, 27:7, 27:16, 28:20 hire [1] - 34:20 historical [1] - 126:14 history [1] - 70:11 Hit [1] - 19:20 hmm [8] - 16:25, 18:2, 87:20, 90:1, 114:8, 118:21, 124:2, 157:10 hold [1] - 169:16 holding [1] - 168:16 Home [3] - 75:15, 214:3, 214:7 Honor [31] - 3:10, 3:21, 14:5, 15:15, 31:8, 33:5, 33:23, 33:24, 44:18, 44:19, 44:21, 44:23, 44:25, 45:4,	45:6, 94:24, 107:4, 160:10, 160:23, 162:14, 163:5, 164:12, 166:20, 166:21, 169:13, 171:22, 201:17, 210:10, 210:14, 210:24, 212:16 HONORABLE [1] - 1:10 hope [1] - 164:8 hosted [2] - 48:16, 52:20 hour [1] - 3:6 hundred [6] - 10:15, 10:25, 14:23, 14:24, 38:8, 40:24 hundreds [1] - 118:1 hurricane [1] - 163:3	192:10, 192:12, 193:1, 193:5, 193:15, 193:17, 194:2, 194:4, 194:11, 195:3, 198:8, 198:12, 198:15, 198:19, 198:20, 199:15, 199:18, 199:21, 206:24, 207:3 idea [2] - 162:8, 162:13 identical [4] - 43:9, 87:17, 87:18, 110:15 identification [3] - 15:2, 16:15, 201:8 identified [2] - 103:2, 185:7 identifier [23] - 21:20, 51:1, 67:19, 68:12, 126:15, 130:20, 130:24, 130:25, 131:1, 131:7, 131:14, 131:25, 132:23, 132:24, 137:22, 137:25, 139:18, 143:18, 145:8, 146:7, 167:11, 167:12, 179:17 identifiers [1] - 143:16 identifies [4] - 51:20, 133:25, 134:1, 179:21 identify [12] - 14:6, 51:15, 51:17, 51:18, 51:22, 56:5, 72:1, 78:1, 89:5, 165:16, 167:2, 179:18 identifying [4] - 150:5, 150:15, 150:17, 180:10 identities [2] - 166:16, 174:9 Identities [3] - 173:20, 174:5, 174:6 identity [34] - 55:12, 72:21, 72:22, 72:23, 73:3, 81:8, 81:15, 81:17, 81:18, 104:10, 115:22, 138:23, 166:17, 173:20, 174:7, 175:3, 175:17, 176:4, 176:7, 176:23,
	H		I	
	H-A-R-R-I-S [1] - 4:3 half [2] - 10:22, 10:23 Hallandale [1] - 27:6 hand [6] - 19:25, 63:8, 84:17, 113:6, 155:19, 181:8 handle [1] - 203:21 handwriting [1] - 28:16 happy [2] - 94:25, 95:2 Hard [1] - 19:20 hard [3] - 115:6, 201:1, 201:10 Hard-Hit [1] - 19:20 HARRIS [2] - 2:3, 3:24 Harris [8] - 3:12, 3:22, 4:2, 4:7, 15:12, 15:19, 34:11 Harvest [1] - 32:15 HDMI [3] - 64:18,		ID [108] - 65:5, 65:6, 67:16, 68:6, 68:12, 68:15, 72:17, 73:5, 73:7, 73:9, 74:15, 84:23, 85:5, 85:12, 88:14, 88:19, 89:8, 91:8, 92:9, 93:8, 95:17, 97:2, 97:3, 97:9, 97:11, 100:5, 100:7, 101:8, 105:11, 107:24, 108:8, 109:18, 111:21, 113:14, 114:7, 115:11, 115:13, 116:12, 117:5, 119:15, 120:4, 120:5, 120:17, 120:21, 122:9, 123:5, 124:21, 124:23, 126:7, 126:9, 126:11, 126:18, 128:19, 132:19, 133:1, 141:6, 141:11, 146:7, 165:17, 167:4, 167:22, 178:6, 178:13, 178:19, 178:21, 179:2, 179:8, 179:10, 179:17, 180:4, 182:14, 182:15, 182:18, 182:25, 183:1, 183:2, 185:24, 186:8, 186:15, 190:24, 191:20, 191:23, 192:3, 192:4,	

177:3, 177:7, 177:23, 177:25, 180:18, 181:6, 181:24, 185:5, 191:1, 191:14, 192:11, 192:17, 193:9, 201:13 IDs [1] - 125:1 illegally [1] - 210:6 image [9] - 77:24, 179:8, 182:13, 182:15, 193:3, 199:13, 199:18, 201:2 images [1] - 192:3 imagine [1] - 180:16 immediately [2] - 118:16, 119:9 impacted [2] - 127:21, 127:22 implement [1] - 4:14 implementation [1] - 7:10 implemented [2] - 6:6, 7:6 implementing [2] - 6:1, 19:18 important [8] - 6:14, 8:4, 9:9, 12:14, 13:16, 13:19, 13:22, 25:18 imprisonment [3] - 20:21, 20:23, 21:1 incident [1] - 213:10 include [3] - 105:24, 144:19, 184:2 included [4] - 19:12, 92:8, 171:13, 193:13 includes [15] - 11:10, 57:14, 76:24, 90:24, 110:5, 182:13, 183:18, 191:18, 191:23, 192:3, 192:18, 198:12, 198:15, 199:15, 199:21 including [5] - 19:13, 20:21, 87:19, 117:23, 216:9 income [29] - 7:2, 17:6, 17:19, 18:7, 22:17, 27:14, 27:18, 29:24, 33:12, 33:15, 35:5, 42:17, 42:23, 43:4, 56:14, 57:14, 77:1, 77:2, 77:5, 77:15, 77:19, 78:10, 78:17, 79:21,	82:12, 82:16, 87:19, 103:1, 105:1 incoming [1] - 209:13 incomplete [1] - 116:22 increase [1] - 110:5 increased [1] - 11:16 independently [1] - 76:17 indicated [5] - 14:12, 32:1, 181:7, 210:2 indicates [6] - 31:20, 33:3, 178:19, 180:1, 198:18, 209:21 indicating [1] - 16:20 indication [2] - 43:2, 43:3 indictment [3] - 213:13, 213:21, 214:9 individual [16] - 39:7, 39:8, 40:14, 53:1, 53:6, 56:13, 123:7, 134:3, 148:5, 148:10, 167:9, 181:3, 181:14, 181:16, 183:11, 191:19 individual's [1] - 179:2 individuals [6] - 25:16, 48:10, 75:23, 101:19, 112:22, 148:12 industries [2] - 175:15, 175:17 Infante [1] - 172:12 infer [2] - 187:13, 187:14 information [164] - 9:8, 9:13, 11:22, 12:20, 13:16, 16:20, 19:3, 20:15, 20:16, 21:22, 22:21, 24:4, 27:8, 28:23, 29:8, 29:12, 30:4, 30:7, 30:18, 31:1, 31:13, 33:12, 33:16, 33:20, 35:3, 35:4, 35:18, 35:21, 36:2, 36:6, 36:20, 36:22, 41:13, 41:17, 41:23, 42:24, 43:16, 49:16, 49:19, 49:23, 50:1, 50:14, 50:22, 50:25, 51:3, 51:14, 52:11, 54:4,	55:4, 55:5, 55:7, 55:19, 56:4, 57:2, 57:16, 57:21, 57:25, 58:9, 58:15, 58:17, 59:3, 59:11, 65:7, 65:15, 65:20, 67:5, 69:25, 70:1, 70:7, 70:11, 78:16, 80:14, 81:5, 81:18, 82:2, 82:4, 83:5, 83:8, 83:10, 83:14, 84:10, 87:18, 90:20, 90:24, 98:14, 98:15, 98:16, 99:1, 100:19, 110:2, 114:24, 122:15, 124:8, 124:10, 126:8, 126:13, 127:16, 128:21, 129:1, 130:19, 132:22, 133:4, 133:7, 133:21, 134:25, 136:21, 137:18, 139:6, 140:6, 140:10, 140:24, 142:8, 143:14, 144:19, 145:19, 148:6, 148:13, 148:21, 148:22, 150:5, 150:9, 150:16, 150:17, 151:20, 152:4, 158:11, 159:15, 159:16, 159:19, 167:11, 168:1, 170:12, 170:16, 170:20, 171:4, 171:5, 171:10, 178:10, 178:12, 179:7, 181:3, 183:16, 183:18, 184:6, 191:16, 191:17, 191:18, 194:1, 194:8, 194:15, 194:16, 195:9, 195:24, 198:7, 198:11, 200:8, 207:3, 207:18, 207:20, 215:1, 215:3, 216:8 informational [1] - 117:15 informed [1] - 160:18 initial [9] - 29:4, 63:6, 153:11, 155:9, 155:16, 155:18, 155:21, 155:23, 156:3 initialed [5] - 44:13,	88:3, 106:2, 110:16, 159:3 initialled [2] - 91:24, 159:2 initialling [1] - 44:9 initials [11] - 20:4, 28:18, 28:19, 43:3, 44:15, 83:16, 83:20, 94:19, 106:3, 155:11, 155:20 initiated [1] - 63:19 input [2] - 129:1, 149:4 inputs [3] - 35:18, 36:21, 152:3 inputted [14] - 36:12, 36:23, 41:25, 43:16, 50:15, 57:6, 57:8, 67:7, 67:14, 80:4, 96:15, 128:21, 148:22, 151:20 inputting [9] - 35:18, 36:20, 41:16, 148:5, 148:12, 148:17, 148:18, 167:25 inquiry [31] - 136:25, 137:24, 177:21, 179:11, 179:13, 179:17, 179:18, 180:2, 181:19, 182:16, 183:17, 183:20, 183:21, 188:18, 191:1, 191:11, 192:17, 194:23, 195:1, 195:4, 195:6, 197:20, 198:2, 198:5, 198:17, 198:23, 199:23, 200:1, 200:2, 200:9 insert [1] - 127:13 inserted [1] - 127:7 insertion [2] - 125:6, 127:24 insertions [1] - 123:8 inside [1] - 77:20 instance [7] - 97:19, 112:21, 153:2, 177:22, 179:19, 179:20, 180:13 instances [3] - 61:21, 170:9, 204:2 instead [3] - 95:16, 155:2, 181:23 institution [4] - 20:25, 55:18, 80:25, 81:1	institutions [1] - 183:10 instruct [1] - 172:23 instructions [4] - 80:23, 119:10, 120:7, 124:9 instrument [1] - 216:5 insurance [1] - 24:11 insured [1] - 20:25 intent [1] - 49:1 interacting [2] - 180:13, 180:15 interacts [1] - 149:8 interest [1] - 24:12 internal [3] - 126:9, 146:6, 151:12 internally [1] - 117:19 Internet [9] - 51:22, 52:1, 187:20, 203:23, 204:10, 204:12, 204:14, 209:25, 210:3 interrupt [1] - 162:1 Interstate [1] - 3:5 introduce [3] - 46:6, 212:9, 215:2 introduced [2] - 152:13, 152:14 introducing [1] - 14:16 involved [7] - 48:7, 48:20, 100:10, 147:23, 148:5, 179:4, 193:9 involvement [1] - 37:5 involving [3] - 25:12, 34:16, 161:5 IOS [1] - 133:14 IP [109] - 51:10, 51:15, 52:3, 52:8, 52:17, 72:5, 72:7, 72:9, 72:10, 73:21, 87:1, 87:5, 90:6, 90:9, 94:7, 99:19, 100:1, 109:3, 112:7, 112:11, 125:13, 125:14, 125:16, 125:19, 128:25, 129:3, 129:10, 129:18, 129:25, 130:3, 130:4, 130:7, 133:18, 134:12, 135:8, 135:11, 135:21, 136:4, 137:15, 138:2, 138:4, 138:8, 138:9, 138:12,
---	---	--	---	---

140:9, 141:3, 141:14, 141:17, 141:21, 142:1, 142:20, 142:23, 144:16, 144:25, 146:5, 146:9, 146:14, 146:25, 147:23, 148:10, 148:21, 150:13, 159:16, 160:3, 160:5, 160:6, 160:8, 166:3, 166:5, 166:11, 166:13, 166:18, 167:2, 167:14, 167:19, 184:8, 184:11, 184:17, 184:18, 185:2, 185:11, 185:17, 186:2, 186:11, 186:18, 187:12, 187:13, 187:14, 187:18, 187:23, 189:8, 190:10, 196:2, 196:3, 196:11, 196:14, 196:25, 197:4, 197:8, 197:12, 197:16, 200:11, 204:5, 204:10, 204:16, 204:18, 209:22, 209:24, 210:5 iPhone [4] - 138:18, 138:19, 184:14, 189:11 IRS [2] - 82:12, 110:6 ISP [3] - 51:23, 51:25, 52:1 issue [7] - 103:2, 106:17, 161:4, 212:7, 215:16, 216:15, 216:16 issued [4] - 19:16, 33:13, 125:24, 178:21 issues [1] - 211:14 item [1] - 78:17 items [1] - 28:19 itself [10] - 48:21, 48:23, 49:8, 50:14, 78:18, 114:17, 114:19, 127:14, 155:13, 204:15	job [1] - 46:21 JOHNNY [1] - 1:16 Johnny [2] - 1:16, 172:5 JR [1] - 1:16 Jr [1] - 1:16 judge [3] - 201:25, 211:10, 215:8 Judge [17] - 160:16, 162:10, 162:18, 162:20, 163:21, 166:23, 170:22, 171:24, 172:5, 172:8, 172:12, 172:20, 173:4, 194:17, 201:23, 211:9, 215:22 JUDGE [1] - 1:11 July [1] - 135:25 jumped [1] - 93:16 June [2] - 31:18, 31:25 Juror [3] - 172:8, 211:2, 211:3 JUROR [2] - 160:21, 164:7 jurors [4] - 3:3, 14:8, 211:2, 211:7 jurors' [1] - 172:7 JURY [1] - 1:10 jury [20] - 3:7, 4:9, 34:7, 45:19, 46:6, 47:13, 68:11, 98:24, 100:14, 124:12, 142:10, 161:3, 161:11, 162:23, 163:8, 173:19, 175:7, 203:18, 204:9, 209:20 Jury [7] - 3:15, 34:5, 106:12, 107:2, 161:17, 163:23, 210:21 jury's [1] - 51:14	69:25, 70:1, 80:6, 84:13, 122:14, 131:17, 184:5, 201:14 keyboard [2] - 63:7, 155:20 kids [1] - 164:4 kind [22] - 10:4, 46:7, 47:16, 50:25, 55:3, 69:21, 73:16, 79:12, 84:4, 94:21, 100:14, 103:22, 105:24, 135:19, 145:17, 146:19, 175:6, 177:18, 183:16, 205:2, 206:21, 208:17 kinds [2] - 136:24, 175:7 kit [3] - 133:23, 176:8, 176:10 knowingly [1] - 20:19 knowledge [8] - 56:24, 57:13, 59:9, 61:22, 75:3, 81:16, 84:25, 86:1 known [9] - 22:24, 30:7, 33:11, 33:19, 59:19, 81:12, 109:16, 156:16, 212:6 KYC [6] - 70:20, 70:22, 73:11, 98:24, 99:10, 104:18	laptop [2] - 63:9, 134:5 largely [1] - 6:25 last [28] - 20:13, 45:12, 65:16, 67:22, 83:12, 85:4, 85:12, 88:18, 91:12, 97:4, 98:3, 99:21, 101:14, 105:13, 108:8, 109:5, 126:20, 126:22, 128:13, 128:14, 135:24, 191:1, 191:11, 202:19, 205:9, 208:8, 209:17, 212:23 lastly [1] - 197:16 late [4] - 3:3, 3:18, 161:1, 161:2 latitude [1] - 187:14 Lauderdale [1] - 16:11 Law [1] - 1:16 law [3] - 6:5, 19:13, 20:21 laying [2] - 14:14, 15:3 layman's [1] - 204:8 lead [1] - 4:13 leading [4] - 169:10, 169:13, 170:25, 193:11 lean [1] - 173:23 learned [1] - 53:22 least [2] - 161:14, 163:1 leave [2] - 180:16, 194:20 left [20] - 16:15, 19:25, 84:17, 84:22, 98:19, 113:4, 113:12, 115:5, 115:7, 181:18, 181:23, 182:10, 187:7, 204:21, 205:18, 206:15, 206:17, 208:12, 209:3 left-hand [2] - 19:25, 84:17 legal [3] - 42:4, 91:6, 104:24 legislation [1] - 12:15 lender [51] - 7:18, 12:22, 13:3, 21:5, 26:7, 26:15, 26:18, 29:4, 29:7, 29:8, 29:12, 32:11, 32:14, 56:8, 60:6,	60:9, 60:10, 60:11, 60:16, 60:20, 60:23, 61:2, 61:3, 61:5, 61:6, 61:10, 61:11, 61:13, 61:15, 68:13, 68:14, 69:1, 69:3, 74:21, 74:22, 74:24, 81:2, 82:21, 82:22, 82:23, 82:24, 83:1, 98:3, 99:4, 99:5, 100:22, 109:21, 117:16, 117:18, 118:3 lenders [26] - 5:9, 7:14, 7:21, 8:1, 8:16, 11:13, 11:17, 11:21, 21:22, 35:9, 35:12, 59:25, 60:6, 60:8, 60:13, 68:22, 69:9, 97:19, 97:23, 98:4, 99:7, 100:9, 117:14, 117:23, 117:24, 118:2 lending [3] - 6:14, 8:14, 8:20 Lendistry [4] - 69:3, 73:10, 92:12, 98:2 less [2] - 164:25, 165:4 letter [2] - 208:6, 209:21 letter-sized [1] - 208:6 letters [2] - 20:11, 107:15 letting [4] - 106:22, 117:14, 118:9, 118:12 level [1] - 9:17 license [2] - 178:20, 191:24 likely [1] - 193:2 limit [4] - 10:12, 40:20, 169:21, 194:25 limited [1] - 39:8 limits [1] - 10:10 Lindsey [1] - 173:10 LINDSEY [3] - 2:8, 173:7, 173:11 line [27] - 22:16, 29:24, 78:1, 78:2, 78:17, 78:21, 79:17, 79:20, 79:23, 79:24, 80:4, 82:13, 86:14, 90:24, 103:10, 103:25, 104:4, 104:7, 105:1,
J		L		
January [5] - 67:11, 76:6, 76:9, 76:13, 101:12		labeled [3] - 77:7, 78:13, 145:22 labels [1] - 41:5 lack [1] - 213:12 ladies [11] - 3:2, 3:16, 14:11, 34:3, 160:14, 160:17, 161:15, 163:24, 210:16, 212:10, 216:19 lady [1] - 172:9 Lance [1] - 217:7 LANCE [1] - 1:21 Lane [13] - 43:11, 113:22, 114:1, 114:4, 117:23, 151:10, 151:11, 151:12, 151:20, 151:23, 151:24, 152:1 lapsed [1] - 169:20	K	
		keep [20] - 26:9, 50:16, 50:19, 50:21, 75:7, 81:17, 92:16, 94:25, 95:2, 95:4, 112:17, 115:3, 121:7, 174:2, 175:1, 177:7, 202:13, 203:24, 204:2 kept [11] - 50:16, 55:21, 65:10,		

				M
110:8, 143:25, 157:3, 207:21, 207:25, 208:7, 209:11 lines [8] - 103:8, 124:1, 190:2, 190:3, 190:16, 190:20, 190:25, 206:25 link [8] - 56:1, 63:2, 64:5, 116:23, 136:25, 137:24, 153:10, 154:5 linking [2] - 138:11, 140:17 links [1] - 146:2 list [5] - 65:4, 123:4, 139:14, 146:2, 209:22 listed [16] - 16:3, 16:10, 20:10, 22:10, 22:11, 22:16, 29:18, 29:24, 30:19, 31:6, 31:19, 77:2, 113:19, 125:19, 126:11, 180:9 listen [1] - 147:22 lists [1] - 183:11 live [1] - 45:25 lived [5] - 54:5, 54:7, 66:18, 131:9, 169:22 LLC [2] - 32:15, 75:15 LLH [1] - 185:8 loan [133] - 5:2, 7:11, 7:17, 7:18, 8:19, 8:24, 9:1, 9:2, 9:10, 10:11, 11:8, 11:18, 11:22, 11:25, 12:23, 13:1, 13:2, 13:6, 13:7, 13:8, 13:9, 13:12, 13:13, 17:13, 18:6, 18:8, 18:10, 18:24, 19:15, 20:20, 21:6, 21:18, 22:25, 23:7, 23:8, 23:11, 24:6, 24:7, 26:2, 26:8, 26:11, 26:17, 26:21, 27:22, 28:1, 28:6, 28:13, 29:5, 30:8, 30:11, 30:14, 31:1, 31:14, 31:15, 31:16, 31:17, 31:19, 31:20, 31:21, 32:1, 32:3, 32:11, 32:16, 32:17, 32:20,	33:13, 33:16, 33:17, 33:19, 34:16, 34:20, 37:4, 37:20, 37:22, 37:23, 38:1, 39:4, 39:5, 39:13, 39:23, 40:2, 40:20, 43:20, 43:25, 49:11, 49:14, 49:17, 53:11, 56:17, 59:21, 59:24, 68:18, 69:4, 69:6, 69:7, 73:11, 85:14, 90:18, 92:12, 92:14, 92:17, 92:23, 96:15, 97:16, 97:24, 99:2, 102:20, 104:11, 104:23, 111:4, 112:12, 112:14, 119:9, 121:15, 149:12, 152:22, 152:25, 153:7, 170:3, 213:11, 213:12, 214:2, 214:5, 214:7, 215:2, 215:7, 215:19, 215:20 loans [27] - 5:10, 10:8, 12:24, 12:25, 13:10, 24:16, 24:19, 26:10, 34:17, 35:9, 35:10, 40:5, 46:13, 48:11, 49:6, 56:19, 176:6, 177:4, 214:9, 214:14, 214:15, 215:1, 215:4, 215:24, 216:6, 216:8, 216:9 local [3] - 11:12, 51:21, 202:4 located [3] - 184:3, 196:15, 196:17 location [2] - 187:13, 187:15 log [25] - 52:23, 52:25, 53:5, 53:6, 58:6, 66:14, 66:19, 131:4, 131:6, 132:24, 137:2, 139:17, 142:11, 143:23, 144:7, 149:21, 149:22, 149:24, 150:4, 150:7, 150:20, 151:14, 167:11, 168:14 logged [6] - 58:8, 136:4, 136:8,	137:1, 170:20, 171:2 logging [4] - 51:2, 66:14, 168:23, 168:25 login [31] - 50:22, 51:8, 64:7, 131:3, 131:7, 131:8, 131:19, 131:22, 132:3, 132:8, 132:19, 132:25, 133:1, 133:2, 133:3, 133:6, 133:9, 133:11, 133:18, 137:3, 137:19, 143:11, 143:12, 144:4, 144:9, 144:17, 144:20, 145:12, 151:4, 168:10, 201:14 logins [13] - 50:19, 131:3, 131:17, 134:12, 134:15, 135:11, 135:17, 135:21, 136:6, 144:25, 145:6, 145:9, 145:20 longitude [1] - 187:14 look [42] - 20:7, 64:14, 71:5, 72:13, 73:13, 75:11, 76:7, 76:10, 77:4, 77:14, 85:17, 86:14, 87:15, 89:15, 95:11, 97:3, 97:10, 98:8, 102:10, 109:25, 115:2, 117:2, 118:24, 121:10, 122:7, 130:10, 130:14, 136:16, 140:19, 143:7, 145:22, 146:18, 155:7, 181:18, 188:13, 189:5, 189:22, 189:23, 189:24, 204:12, 208:7 looked [38] - 23:2, 30:10, 79:25, 82:13, 87:15, 88:14, 89:25, 90:21, 91:10, 91:20, 93:11, 93:19, 94:14, 95:14, 97:17, 98:11, 98:16, 99:2, 102:19, 105:18, 110:13, 111:19,	120:1, 137:3, 140:12, 142:15, 170:13, 181:22, 190:4, 190:7, 195:10, 195:12, 195:21, 198:3, 198:24, 199:25, 212:6 looking [57] - 15:19, 65:25, 68:2, 69:6, 69:11, 70:6, 70:8, 72:14, 73:5, 74:4, 75:8, 76:4, 80:19, 85:7, 94:1, 94:21, 96:20, 97:6, 102:20, 103:16, 107:7, 107:23, 111:2, 123:3, 123:9, 123:14, 125:7, 125:18, 126:17, 130:13, 131:12, 131:25, 136:14, 139:5, 143:12, 143:18, 145:25, 152:12, 159:4, 166:1, 170:13, 174:8, 175:10, 181:5, 183:16, 183:25, 186:8, 187:25, 188:6, 188:13, 188:25, 200:3, 205:5, 205:15, 205:18, 206:5, 207:17 looks [26] - 25:2, 32:3, 65:4, 74:1, 75:22, 78:15, 86:9, 87:17, 96:4, 102:6, 129:7, 138:6, 138:10, 138:16, 155:10, 157:14, 157:18, 158:2, 158:17, 158:23, 164:25, 165:2, 165:6, 189:2, 191:8 LOVE [18] - 1:13, 3:21, 4:4, 4:6, 14:5, 14:20, 15:8, 15:10, 15:18, 31:8, 31:10, 33:5, 33:6, 33:22, 36:14, 44:23, 44:25, 210:24 Love [1] - 2:4 low [1] - 4:23 low-cost [1] - 4:23 lunch [3] - 106:9, 106:25, 107:7 Lunch [1] - 107:1	M-O-R-R-O-W [1] - 202:19 machine [3] - 134:19, 134:21, 146:21 maintain [1] - 8:11 major [2] - 55:14, 55:15 majority [1] - 24:7 managed [1] - 7:3 manner [4] - 54:18, 54:19, 189:18, 215:5 March [4] - 46:16, 71:4, 71:22, 96:19 marked [2] - 15:4, 37:1 marketing [2] - 53:17, 112:15 masse [1] - 14:21 master's [2] - 47:15, 47:18 match [2] - 60:9, 112:23 matched [1] - 54:14 material [6] - 20:17, 24:5, 28:24, 31:2, 53:18, 83:15 math [2] - 158:21, 164:25 matter [6] - 10:16, 38:16, 39:21, 212:5, 213:17, 217:5 matters [2] - 210:22, 213:19 max [1] - 164:8 maximum [9] - 10:17, 17:9, 17:11, 18:6, 18:8, 27:19, 27:21, 40:20, 40:21 MCA [4] - 126:10, 126:12, 126:17, 139:7 MCCRAY [18] - 1:16, 161:10, 162:18, 162:20, 169:10, 169:13, 171:17, 171:24, 172:2, 172:5, 172:12, 172:17, 172:19, 173:2, 173:4, 201:23, 210:13, 211:9 McCray [2] - 1:16, 172:5 mean [49] - 12:25, 13:8, 34:23, 35:4,

37:22, 38:3, 39:11, 39:12, 40:11, 40:19, 41:18, 43:18, 51:7, 52:20, 54:7, 77:21, 98:5, 103:5, 124:12, 127:8, 127:15, 127:20, 128:11, 129:10, 130:24, 140:3, 143:20, 144:4, 144:12, 153:25, 154:12, 154:13, 154:14, 158:2, 158:22, 159:5, 162:12, 162:21, 167:8, 167:9, 176:17, 192:7, 196:17, 202:9, 205:21, 206:2, 206:12, 216:3 meaning [2] - 172:16, 195:2 means [24] - 13:1, 14:13, 31:15, 68:11, 72:19, 72:20, 76:15, 80:10, 87:4, 101:22, 114:14, 127:7, 127:9, 143:21, 144:14, 178:20, 191:24, 192:8, 201:10, 206:3, 207:11, 211:21, 215:5 mechanical [1] - 1:24 mechanism [1] - 25:14 medical [1] - 106:15 memorized [1] - 160:8 memory [2] - 87:17, 110:4 mentioned [10] - 5:7, 11:5, 11:6, 11:12, 12:3, 17:13, 56:10, 175:10, 207:4, 213:8 merely [1] - 211:16 message [8] - 54:20, 54:22, 54:23, 150:25, 154:20, 168:14, 168:17 messages [1] - 37:16 met [1] - 10:11 metadata [3] - 70:10, 133:10, 156:17 method [1] - 41:12 Miami [5] - 1:3, 1:22, 1:23, 4:11, 217:9	microphone [2] - 173:22, 173:23 Microsoft [2] - 129:13, 136:11 middle [5] - 23:23, 27:16, 30:21, 31:11, 32:20 might [1] - 180:16 million [3] - 8:5, 21:2, 215:16 mimicked [1] - 62:17 mimics [1] - 7:17 mind [1] - 202:13 mindful [3] - 163:12, 213:6, 213:11 minimum [1] - 24:9 minute [2] - 36:4, 159:13 minutes [21] - 3:5, 54:9, 54:14, 68:21, 95:15, 151:1, 161:13, 161:25, 162:12, 162:13, 162:14, 162:16, 165:1, 165:5, 169:5, 169:20, 169:23, 169:25, 201:25, 202:6, 202:9 misheard [1] - 71:15 mission [3] - 4:14, 4:20, 6:4 misspoke [2] - 71:16, 209:2 mistake [1] - 74:10 mistaken [1] - 37:25 mobile [5] - 63:8, 145:18, 187:18, 203:22, 205:22 model [9] - 136:1, 136:3, 145:11, 147:3, 147:6, 184:23, 196:22, 207:20, 207:23 Model [1] - 136:2 moment [12] - 15:14, 23:2, 30:10, 31:8, 33:5, 44:18, 71:1, 72:13, 95:5, 155:6, 195:12, 201:17 Monday [2] - 160:21, 160:22 money [16] - 6:17, 7:23, 8:1, 8:7, 8:9, 9:4, 12:15, 12:17, 38:25, 39:16, 56:8, 60:20, 61:14, 74:18, 81:3, 100:23 moneys [4] - 6:23, 7:3, 9:21, 24:2	month [1] - 212:19 monthly [2] - 17:21, 27:20 months [2] - 10:23, 174:11 morning [12] - 3:2, 3:16, 3:21, 4:4, 4:7, 4:8, 34:11, 34:12, 45:15, 45:16, 45:17, 210:17 Morrow [3] - 202:14, 202:18, 202:22 MORROW [2] - 2:10, 202:15 mortgage [2] - 24:11, 24:12 most [11] - 10:13, 37:25, 38:3, 38:4, 38:25, 39:1, 39:22, 46:11, 46:23, 60:19, 211:6 mouth [1] - 149:15 move [1] - 173:22 moved [1] - 118:2 moving [10] - 18:13, 21:3, 21:16, 22:1, 23:5, 28:3, 29:2, 29:15, 32:9, 118:1 MR [143] - 3:10, 3:12, 3:21, 4:4, 4:6, 14:5, 14:20, 14:23, 15:8, 15:10, 15:15, 15:18, 31:8, 31:10, 33:5, 33:6, 33:22, 33:24, 34:1, 34:10, 36:14, 36:19, 44:18, 44:23, 44:25, 45:2, 45:4, 45:6, 45:14, 64:17, 64:19, 94:24, 95:4, 95:8, 95:10, 106:19, 106:24, 107:4, 107:5, 147:11, 147:14, 147:16, 160:16, 160:23, 161:1, 161:6, 161:8, 161:10, 161:19, 161:24, 162:3, 162:6, 162:10, 162:14, 162:17, 162:18, 162:20, 163:3, 163:5, 163:7, 163:14, 163:19, 163:21, 164:12, 164:13, 165:7, 165:9, 165:10, 166:20, 166:23, 166:25, 168:3, 168:5,	168:9, 169:10, 169:13, 169:14, 169:18, 170:22, 171:1, 171:15, 171:17, 171:18, 171:22, 171:24, 172:2, 172:5, 172:12, 172:17, 172:19, 173:2, 173:4, 173:13, 173:25, 193:11, 193:16, 194:17, 194:21, 194:22, 200:16, 200:20, 201:17, 201:20, 201:23, 201:25, 202:2, 202:3, 202:5, 202:8, 202:12, 202:14, 202:21, 209:16, 210:7, 210:10, 210:12, 210:13, 210:24, 211:9, 211:10, 211:16, 211:18, 211:25, 212:11, 212:14, 212:16, 212:19, 213:24, 214:1, 214:5, 214:11, 214:14, 214:17, 214:19, 214:21, 214:25, 215:8, 215:11, 215:20, 215:22, 216:3, 216:17, 216:22 multiple [10] - 40:19, 68:22, 69:8, 112:24, 148:12, 178:15, 183:21, 192:14, 201:7 multiplied [3] - 10:22, 18:5, 27:21 multiply [2] - 38:10, 38:13 must [2] - 10:11, 119:9	79:14, 79:17, 84:3, 85:20, 91:6, 96:4, 96:14, 97:11, 104:24, 107:16, 108:16, 110:24, 111:25, 114:5, 128:13, 128:14, 136:19, 137:23, 138:17, 139:24, 140:17, 142:13, 146:7, 146:12, 151:12, 151:14, 172:7, 173:9, 173:10, 191:3, 202:17, 202:18, 202:19, 205:9 named [6] - 29:17, 65:6, 65:12, 75:15, 175:7, 209:6 names [2] - 101:6, 138:7 natural [1] - 106:21 nature [1] - 47:20 necessarily [4] - 35:5, 36:11, 36:23, 41:23 need [12] - 5:11, 22:22, 39:24, 124:15, 150:15, 150:18, 169:9, 169:19, 169:25, 175:22, 185:12, 212:1 needed [9] - 9:11, 11:4, 11:22, 56:7, 58:14, 86:9, 181:21, 194:8, 194:15 needs [3] - 10:3, 175:14, 176:19 net [2] - 78:17, 79:24 network [11] - 51:16, 51:17, 51:20, 51:21, 51:24, 134:4, 183:18, 187:22, 207:14, 210:1, 210:4 never [4] - 37:11, 37:14, 37:16, 43:20 New [4] - 187:22, 187:23, 196:15, 196:17 new [14] - 6:3, 8:8, 16:7, 27:4, 55:2, 55:3, 127:9, 127:13, 127:14, 169:9, 169:19, 169:25, 182:9, 199:13 newsletter [21] -
N				
N986U [4] - 145:13, 147:7, 196:23, 200:15 name [60] - 4:1, 16:1, 16:4, 21:8, 21:19, 22:5, 23:17, 25:3, 27:1, 27:8, 31:5, 35:4, 41:15, 42:4, 43:4, 45:10, 45:11, 45:12, 58:23, 65:16, 69:3, 79:7,				

113:14, 114:7, 115:11, 115:13, 115:16, 116:7, 116:12, 117:5, 119:15, 119:20, 120:10, 120:11, 120:13, 120:17, 120:24, 121:1, 121:4, 121:22, 121:24, 122:2, 122:9 newsletters [1] - 115:2 next [34] - 20:4, 28:19, 42:12, 42:16, 45:6, 54:25, 59:25, 66:7, 66:21, 67:8, 80:15, 115:24, 138:11, 153:7, 160:21, 163:15, 164:9, 171:20, 172:9, 181:1, 181:10, 184:15, 190:14, 190:15, 190:18, 190:19, 190:22, 190:24, 199:22, 211:11, 212:13, 212:17, 212:19 nine [4] - 85:6, 85:13, 88:16, 88:20 NO [1] - 1:2 Non [1] - 19:21 Non-Profits [1] - 19:21 none [2] - 3:6, 216:6 nonrequired [1] - 183:6 North [1] - 1:22 note [11] - 92:12, 92:16, 92:19, 93:15, 93:18, 111:3, 111:8, 111:19, 158:10, 159:8, 159:9 notes [2] - 44:20, 217:5 notice [9] - 26:1, 26:4, 26:15, 32:10, 32:12, 164:15, 215:6, 215:15, 216:6 noticed [1] - 117:25 notification [4] - 152:18, 153:1, 153:3, 153:6 notifications [3] - 152:21, 152:23, 152:24 notifying [1] - 121:14	notwithstanding [1] - 189:21 November [1] - 207:10 number [127] - 11:16, 11:19, 14:12, 14:17, 14:18, 14:19, 16:16, 16:17, 16:18, 16:24, 17:1, 17:5, 17:14, 17:15, 18:1, 18:3, 18:4, 18:5, 22:15, 22:18, 26:8, 26:9, 29:21, 30:1, 30:3, 31:16, 32:16, 32:17, 33:13, 42:8, 51:2, 51:18, 51:19, 53:24, 54:1, 54:3, 54:6, 54:17, 54:25, 55:7, 66:9, 66:11, 66:13, 66:15, 66:24, 67:3, 67:18, 69:4, 71:17, 71:18, 71:19, 78:6, 78:21, 79:23, 79:25, 80:3, 80:25, 84:25, 85:2, 87:2, 87:21, 89:4, 91:4, 92:14, 95:16, 96:2, 96:10, 96:13, 96:14, 96:17, 99:15, 101:14, 102:15, 103:3, 103:5, 103:10, 103:25, 104:4, 104:8, 105:3, 105:8, 108:2, 111:17, 116:9, 131:15, 131:16, 132:1, 132:9, 132:12, 136:1, 143:17, 143:25, 144:5, 147:3, 147:6, 150:8, 150:20, 150:23, 167:13, 169:22, 175:9, 175:15, 175:19, 178:6, 178:22, 179:25, 182:25, 184:19, 191:25, 196:22, 198:13, 205:10, 205:16, 205:17, 205:22, 206:2, 206:8, 206:13, 206:24, 207:6, 207:12, 208:8, 208:10, 208:22 Number [4] - 172:8, 172:10, 211:3 numbers [13] - 68:9,	96:25, 99:21, 104:6, 125:4, 125:11, 135:4, 135:9, 140:17, 143:16, 152:4, 206:3, 209:22 O object [1] - 215:13 objection [6] - 36:14, 169:10, 169:13, 169:16, 170:22, 193:11 observe [1] - 211:6 obtain [3] - 20:20, 25:14, 214:25 obtaining [1] - 41:13 obviously [2] - 156:9, 216:13 occurred [8] - 51:9, 123:4, 126:3, 132:3, 135:11, 136:24, 137:5, 141:9 occurs [3] - 124:24, 172:25, 211:7 OCR [2] - 77:14, 77:23 October [1] - 1:4 OF [5] - 1:1, 1:3, 1:10, 1:15, 217:2 OFAC [3] - 183:11, 183:13, 183:14 offer [1] - 9:22 offering [1] - 8:12 offerings [1] - 46:22 office [1] - 4:11 Office [3] - 1:14, 1:16, 183:14 Official [2] - 1:21, 217:8 old [2] - 175:14, 212:18 ON [1] - 1:15 onboarding [2] - 176:20, 176:21 once [9] - 13:12, 53:22, 54:24, 57:22, 57:25, 59:24, 61:10, 181:9, 195:3 one [159] - 3:3, 10:6, 10:13, 10:21, 16:21, 17:5, 19:6, 27:13, 29:23, 31:12, 32:8, 33:10, 39:1, 41:5, 41:7, 44:18, 54:4, 55:23,	56:16, 60:16, 60:19, 60:23, 61:9, 63:8, 66:13, 66:18, 66:25, 68:3, 68:4, 68:18, 68:24, 69:2, 69:6, 69:12, 74:11, 75:3, 76:10, 78:24, 80:16, 82:18, 84:16, 86:15, 87:15, 89:10, 89:17, 89:25, 90:6, 90:17, 91:4, 91:13, 92:6, 92:16, 93:14, 93:15, 95:5, 95:9, 97:14, 97:15, 97:23, 99:4, 100:10, 101:5, 102:10, 102:24, 105:8, 105:18, 107:20, 113:11, 114:15, 114:18, 117:10, 118:3, 118:4, 123:6, 126:12, 126:25, 131:10, 131:13, 131:25, 132:9, 132:17, 135:13, 135:24, 136:8, 136:11, 136:14, 136:16, 138:10, 138:11, 139:14, 142:15, 143:16, 143:21, 144:6, 148:5, 148:16, 148:24, 149:3, 150:10, 154:9, 155:6, 156:23, 159:9, 159:13, 160:5, 160:10, 165:13, 166:20, 166:23, 166:24, 168:13, 172:18, 172:19, 175:18, 175:25, 176:23, 180:15, 183:23, 188:1, 188:22, 188:25, 189:3, 189:6, 190:4, 191:13, 192:9, 192:18, 193:21, 195:23, 198:2, 198:21, 198:22, 198:23, 198:24, 200:2, 200:14, 201:17, 202:1, 203:7, 206:3, 209:17, 211:10, 211:20, 213:6, 214:4, 214:19, 216:9 one-time [11] - 54:4,	66:13, 66:18, 131:10, 131:13, 132:9, 132:17, 136:8, 143:21, 144:6, 168:13 ones [3] - 14:21, 127:4, 190:4 online [3] - 11:15, 48:15, 175:13 oops [1] - 5:24 open [1] - 173:6 operating [7] - 74:22, 75:1, 133:13, 133:22, 134:18, 135:17, 147:8 operation [5] - 7:8, 8:10, 127:2, 127:20, 127:23 operational [2] - 133:12, 145:14 operations [1] - 123:7 opportunities [1] - 50:11 opportunity [1] - 171:6 opposed [1] - 155:1 ops [1] - 203:5 optical [1] - 77:23 order [17] - 56:25, 63:18, 92:22, 124:13, 129:1, 129:6, 132:8, 132:12, 141:15, 150:12, 150:14, 153:7, 168:13, 184:21, 187:20, 203:9, 209:24 Order [1] - 3:1 orders [1] - 19:14 organization [1] - 75:14 organized [1] - 160:15 orient [1] - 15:14 originally [3] - 33:15, 86:8, 171:5 origination [1] - 164:22 Orlando [1] - 4:15 otherwise [1] - 210:6 outgoing [1] - 209:13 outset [1] - 13:5 outside [2] - 124:14, 161:10 outstanding [1] - 13:3 overall [2] - 140:24, 192:11 overruled [2] - 36:16,
---	---	--	---	---

193:12 own [8] - 11:21, 12:20, 35:12, 41:10, 41:11, 80:11, 176:12, 204:15 owned [3] - 204:18, 206:14, 209:22 owner [11] - 10:6, 16:22, 18:23, 21:13, 27:13, 29:10, 31:6, 32:8, 33:10, 56:20 owners [13] - 4:24, 5:16, 6:17, 6:19, 6:23, 7:4, 7:14, 7:18, 8:9, 9:20, 12:17, 38:23, 48:10 ownership [1] - 21:19	185:16, 185:24, 186:8, 186:15, 188:13, 189:5, 189:22, 191:21, 191:22, 192:1, 192:2, 192:5, 192:25, 193:4, 193:17, 193:22, 194:3, 194:5, 194:9, 194:10, 198:10, 198:11, 198:14, 198:16, 199:1, 199:4, 199:14, 199:16, 199:20, 207:19, 208:3, 208:6, 208:7, 208:25, 209:3, 209:4 PAGE [1] - 2:2 Pages [1] - 1:8 pages [6] - 63:16, 89:2, 155:3, 178:15, 190:17, 208:4 pair [1] - 60:5 paired [1] - 61:12 pandemic [7] - 5:18, 6:2, 7:1, 9:6, 11:16, 11:19, 12:4 paragraph [4] - 28:20, 28:21, 117:22, 117:25 paralegal [1] - 1:19 parameter [1] - 169:23 parser [1] - 146:24 part [43] - 6:13, 7:21, 7:22, 9:14, 12:15, 12:16, 18:24, 22:16, 23:11, 29:23, 41:18, 44:14, 46:11, 57:13, 57:19, 59:15, 61:3, 62:6, 62:8, 73:19, 85:9, 97:10, 98:4, 111:3, 114:4, 114:20, 115:5, 121:20, 127:24, 133:10, 152:10, 155:15, 181:4, 182:12, 182:16, 182:20, 183:7, 185:1, 211:6, 213:5, 213:9 particular [28] - 37:19, 50:21, 51:19, 52:6, 56:20, 59:17, 60:6, 60:9, 60:10, 60:21, 68:12, 70:21,	72:20, 78:1, 80:9, 85:3, 86:8, 112:21, 125:6, 131:7, 133:25, 134:1, 139:13, 146:3, 152:20, 167:12, 192:16, 208:19 parties [2] - 124:14, 213:1 partnered [1] - 12:22 party [1] - 14:16 pass [4] - 180:6, 192:11, 192:20 passed [11] - 6:5, 181:7, 182:21, 183:6, 190:20, 192:23, 198:18, 198:19, 198:20, 199:5, 199:6 passing [1] - 6:16 password [2] - 132:15, 168:11 past [7] - 46:10, 163:8, 163:10, 163:11, 199:8, 211:1 pay [7] - 6:24, 7:4, 12:18, 13:11, 24:10, 204:13, 210:3 paycheck [1] - 39:5 Paycheck [22] - 6:6, 6:8, 6:21, 9:3, 15:21, 19:18, 19:22, 24:3, 26:2, 30:25, 37:22, 40:1, 40:4, 41:9, 47:2, 47:5, 47:22, 47:25, 49:7, 107:20, 109:15, 176:24 Paychex [1] - 9:23 payments [1] - 24:12 payroll [20] - 9:5, 9:15, 9:17, 9:21, 9:23, 9:24, 10:21, 10:23, 11:7, 18:12, 24:7, 24:8, 24:9, 28:2, 32:2, 32:3, 33:2, 33:4 PDF [8] - 75:7, 77:18, 77:20, 78:5, 81:14, 154:24, 154:25, 164:22 Pembroke [1] - 27:6 people [14] - 4:14, 7:1, 7:2, 8:8, 40:5, 48:15, 117:19, 118:10, 148:17, 148:18, 167:1, 167:3, 177:4,	215:15 per [1] - 194:25 percent [4] - 24:8, 24:9, 24:10 percentage [1] - 13:4 perform [4] - 133:9, 144:17, 145:8, 145:12 performs [1] - 174:7 perhaps [1] - 163:8 period [13] - 31:24, 74:21, 74:23, 75:2, 75:4, 76:2, 76:4, 76:8, 101:11, 101:18, 158:19, 209:11, 214:8 permanent [5] - 132:15, 168:11, 171:16, 201:22, 210:11 permanently [3] - 44:24, 45:3, 201:21 persisted [2] - 58:10, 58:11 person [41] - 10:6, 16:17, 25:5, 35:17, 38:23, 38:24, 39:4, 40:2, 41:2, 41:22, 42:8, 42:19, 44:9, 44:13, 44:15, 58:13, 59:14, 59:15, 63:14, 64:2, 87:6, 94:18, 107:16, 134:4, 148:17, 148:24, 149:3, 150:3, 154:21, 157:11, 171:3, 179:11, 179:19, 180:1, 190:14, 191:3, 191:9, 196:17, 209:24, 209:25 person's [1] - 150:4 Persona [36] - 72:17, 72:20, 72:22, 72:23, 72:25, 81:7, 81:8, 81:11, 81:16, 104:13, 104:15, 104:17, 104:18, 136:25, 137:24, 138:23, 173:20, 174:4, 174:5, 174:6, 174:7, 174:10, 174:22, 175:4, 175:17, 176:6, 176:15, 176:25, 177:5, 177:7, 179:4, 179:21, 184:5, 187:13, 187:23,	196:14 Persona's [6] - 174:25, 175:8, 175:25, 176:14, 176:19, 185:1 personal [3] - 55:5, 62:2, 137:24 persons [1] - 166:17 phone [71] - 37:11, 42:8, 51:2, 53:24, 54:1, 54:3, 54:6, 54:17, 54:20, 54:25, 66:7, 66:9, 66:11, 66:13, 66:15, 71:17, 71:18, 71:19, 96:10, 96:14, 96:25, 99:15, 130:20, 131:1, 131:5, 131:6, 131:15, 131:16, 132:1, 132:9, 132:11, 134:3, 134:5, 136:1, 136:3, 136:9, 140:17, 143:16, 143:17, 143:25, 144:5, 145:8, 145:10, 150:6, 150:20, 150:23, 151:7, 151:9, 167:13, 168:13, 168:15, 168:21, 168:23, 184:23, 185:14, 185:21, 186:6, 190:5, 190:8, 203:23, 204:2, 206:3, 206:8, 206:13, 206:24, 207:6, 207:11, 207:20, 208:8, 208:10 phonetic [1] - 147:24 photograph [1] - 182:17 photographs [4] - 181:16, 182:7, 182:9, 199:10 physical [1] - 155:1 picked [1] - 104:8 picking [2] - 78:6, 164:3 piece [2] - 127:15, 176:11 pieces [5] - 55:14, 55:15, 58:3, 83:10, 150:9 place [8] - 42:16, 42:19, 48:9, 49:13, 125:17, 155:8,
P				
P.A [1] - 1:16 pace [1] - 174:2 Pacific [3] - 90:5, 109:10, 112:6 page [118] - 18:13, 18:16, 18:21, 19:4, 21:3, 21:4, 21:16, 21:17, 22:18, 28:3, 28:4, 29:2, 29:3, 29:11, 29:24, 30:22, 42:10, 42:12, 42:14, 42:21, 42:24, 43:2, 83:3, 83:6, 83:8, 83:9, 83:24, 84:1, 88:7, 89:3, 91:18, 91:19, 92:1, 92:25, 93:2, 93:16, 104:18, 105:23, 107:8, 107:11, 108:1, 110:18, 111:2, 111:11, 111:17, 154:18, 156:9, 156:11, 156:12, 156:15, 177:24, 178:17, 178:23, 179:12, 179:24, 181:1, 181:2, 181:12, 181:19, 182:5, 182:11, 182:22, 183:7, 183:15, 183:17, 183:25, 184:1, 184:2, 184:8, 184:15, 185:6, 185:7, 185:8, 185:12,				

168:18, 184:5 placed [1] - 35:3 places [1] - 126:12 Plaid [4] - 56:2, 100:16, 100:17, 100:18 Plaintiff [1] - 1:4 plan [1] - 95:3 Plan [1] - 19:22 planning [1] - 106:20 platform [2] - 36:3, 36:6 PLOR [1] - 186:15 PM [26] - 1:6, 94:2, 94:4, 94:6, 99:14, 106:10, 106:12, 107:1, 107:2, 112:5, 112:6, 129:24, 161:17, 163:22, 163:23, 164:1, 189:2, 190:2, 190:16, 190:20, 190:25, 196:10, 210:21, 216:23 podium [2] - 171:23, 177:14 point [6] - 6:15, 25:20, 64:14, 154:24, 167:6, 216:4 pointing [2] - 38:6, 157:4 points [2] - 19:9, 213:24 portal [12] - 41:22, 53:25, 63:2, 63:3, 101:23, 140:7, 148:1, 148:23, 149:8, 154:19, 159:15 portion [6] - 19:24, 21:4, 27:16, 30:22, 105:10, 106:21 portions [1] - 63:6 portrait [5] - 179:2, 179:10, 183:2, 192:4, 198:15 pose [2] - 181:17, 182:10 poses [1] - 181:22 position [4] - 174:12, 203:3, 212:4, 216:14 possession [1] - 148:22 possibility [1] - 148:4 possible [9] - 36:25, 106:23, 117:20, 153:22, 154:1,	171:9, 171:21, 189:16, 214:24 possibly [1] - 213:17 powered [1] - 48:24 PPP [119] - 6:9, 6:23, 7:2, 7:5, 7:11, 7:16, 8:11, 8:25, 10:8, 10:12, 10:20, 10:23, 11:8, 13:9, 13:11, 13:25, 18:6, 22:21, 23:7, 26:21, 30:3, 30:4, 30:14, 31:14, 31:15, 31:17, 31:21, 32:11, 33:16, 34:16, 34:17, 34:20, 37:20, 37:22, 39:5, 39:13, 39:15, 39:22, 43:20, 46:12, 46:13, 48:1, 48:4, 48:10, 49:6, 49:7, 49:11, 49:14, 49:17, 52:6, 52:9, 52:20, 53:11, 56:17, 56:19, 57:1, 57:22, 59:18, 59:21, 59:24, 74:18, 75:4, 79:1, 81:17, 82:9, 85:14, 87:25, 90:18, 92:17, 92:20, 96:15, 102:20, 104:11, 104:23, 105:25, 111:4, 112:12, 112:14, 114:4, 114:5, 121:15, 121:16, 122:15, 123:16, 124:24, 126:10, 126:15, 126:16, 126:25, 132:14, 138:4, 139:18, 148:2, 148:13, 149:12, 150:3, 151:13, 151:24, 152:5, 153:3, 153:7, 154:8, 157:19, 157:23, 158:5, 158:7, 159:18, 164:15, 164:22, 170:2, 176:6, 177:4, 214:2, 214:6, 215:1, 215:2, 215:20, 216:6, 216:8 PPPFASLANE [1] - 48:19 pppfastlane.	womply.com [2] - 48:18, 151:15 precise [3] - 14:18, 187:15, 187:16 prefer [1] - 212:16 preparation [1] - 57:2 prepare [1] - 34:20 prepared [4] - 84:9, 165:12, 216:15, 217:5 preparing [2] - 148:5, 150:2 presence [2] - 161:11, 172:22 present [1] - 183:2 PRESENT [1] - 1:18 presented [1] - 189:18 president [2] - 46:18, 46:19 pressing [1] - 162:18 presumably [9] - 55:17, 88:24, 104:14, 104:17, 104:18, 109:23, 109:24, 111:10, 160:8 pretty [3] - 47:19, 140:18, 193:9 previous [7] - 91:20, 97:16, 185:12, 186:4, 191:18, 199:25, 210:2 previously [9] - 28:25, 30:19, 58:15, 58:19, 89:5, 98:11, 170:16, 171:2, 212:6 primarily [2] - 45:24, 124:25 primary [7] - 4:23, 6:21, 16:18, 23:21, 30:18, 47:8, 47:10 principal [3] - 22:10, 29:18, 79:18 printed [4] - 21:8, 25:3, 31:5, 94:22 private [2] - 8:1, 11:13 problem [6] - 3:3, 15:17, 163:11, 164:2, 194:13, 202:7 problems [1] - 3:17 proceed [4] - 3:18, 15:9, 34:8, 213:20 proceedings [3] - 172:4, 173:6, 217:4 Proceedings [2] - 1:24, 216:23	proceeds [1] - 9:1 process [59] - 5:12, 7:21, 12:10, 14:14, 21:24, 35:12, 48:9, 48:13, 49:6, 49:10, 49:13, 49:17, 53:10, 53:15, 57:24, 59:9, 59:16, 59:17, 61:7, 62:6, 62:8, 62:11, 62:25, 63:11, 63:18, 64:9, 70:20, 72:24, 73:1, 73:19, 81:15, 82:22, 85:3, 92:20, 98:5, 99:9, 103:20, 112:12, 115:24, 117:18, 118:1, 122:16, 133:6, 149:7, 153:23, 154:4, 154:7, 154:12, 155:15, 160:6, 168:10, 175:4, 175:21, 176:21, 179:6, 182:16, 183:8, 200:24, 201:8 processing [2] - 37:5, 117:15 produce [2] - 165:18, 165:19 produced [3] - 1:25, 203:12, 208:4 producing [1] - 46:10 product [1] - 46:22 products [3] - 4:25, 46:18, 46:20 profession [1] - 29:19 professional [3] - 22:10, 62:3, 62:4 profit [1] - 79:24 Profits [1] - 19:21 program [23] - 6:3, 6:11, 6:15, 7:3, 7:16, 9:2, 11:23, 25:19, 26:21, 28:14, 39:5, 46:12, 48:5, 59:18, 60:7, 114:5, 121:16, 121:19, 123:9, 123:14, 124:17, 130:14, 151:13 Program [22] - 6:6, 6:8, 6:21, 9:3, 15:21, 19:18, 19:23, 24:3, 26:2, 30:25, 37:23, 40:2, 40:4, 41:9, 47:2, 47:5, 47:23, 47:25, 49:8, 107:20,	109:15, 176:25 programs [3] - 7:17, 8:12, 39:4 promissory [5] - 92:12, 93:15, 158:10, 159:8, 159:9 prompted [1] - 44:7 prompts [2] - 43:22, 44:3 properly [1] - 199:18 proprietor [10] - 9:25, 10:25, 15:25, 16:18, 22:5, 25:6, 26:25, 39:13, 56:15, 79:15 proprietors [6] - 10:8, 10:11, 22:7, 40:5, 46:12, 56:21 proprietorship [8] - 11:3, 37:20, 38:1, 38:17, 39:11, 39:12, 40:1, 41:2 prospective [2] - 48:13, 49:1 Protection [22] - 6:6, 6:8, 6:21, 9:3, 15:21, 19:18, 19:22, 24:3, 26:2, 30:25, 37:22, 40:2, 40:4, 41:9, 47:2, 47:5, 47:22, 47:25, 49:7, 107:20, 109:15, 176:25 prove [1] - 73:4 provide [17] - 4:23, 5:3, 5:9, 5:20, 5:23, 9:16, 11:5, 55:5, 55:7, 55:24, 72:14, 175:11, 175:19, 193:5, 211:19 provided [23] - 5:24, 9:8, 9:11, 11:4, 20:15, 20:16, 24:4, 26:1, 26:4, 31:1, 59:3, 76:23, 77:19, 80:13, 80:17, 81:6, 98:14, 100:16, 102:25, 137:23, 151:4, 171:14 provider [5] - 9:24, 50:4, 52:1, 55:20, 203:20 provides [4] - 69:22, 175:4, 195:20, 203:19 providing [5] - 28:23, 29:6, 53:24, 56:19, 101:3 public [1] - 51:21
--	--	--	--	---

publish [6] - 14:6, 100:12, 100:25, 113:4, 113:5, 177:12 published [7] - 75:10, 81:20, 84:19, 101:25, 102:4, 104:19, 200:5 publishing [21] - 64:20, 69:14, 70:14, 76:19, 79:9, 87:10, 90:14, 101:16, 102:8, 102:16, 103:13, 109:11, 115:8, 116:4, 119:23, 191:5, 197:24, 206:15, 206:16, 208:11, 208:13 pull [2] - 182:15, 195:16 pulled [1] - 120:16 pulling [1] - 33:7 punishable [1] - 20:20 purported [2] - 20:10, 28:1 purpose [10] - 6:22, 18:10, 20:2, 28:1, 56:4, 73:2, 74:17, 100:20, 153:19, 176:18 purposes [2] - 10:14, 195:8 pursue [1] - 213:22 put [26] - 35:6, 36:6, 42:3, 42:6, 42:8, 57:8, 57:21, 58:8, 68:21, 78:20, 79:1, 84:15, 89:4, 98:19, 103:3, 103:5, 106:5, 115:5, 140:10, 148:24, 156:3, 160:12, 160:13, 170:16, 187:7, 187:8 puts [2] - 36:2, 216:6 putting [3] - 55:4, 94:18, 215:15	172:20 questions [11] - 33:22, 149:20, 166:21, 168:5, 170:1, 170:6, 171:15, 200:17, 201:18, 210:7, 212:21 quick [2] - 34:1, 82:9 quicker [2] - 7:24, 8:2 quickly [4] - 12:17, 75:25, 171:20, 172:1 quite [1] - 181:22	215:25 Received [1] - 15:4 receiving [1] - 168:17 recent [1] - 46:23 recently [1] - 46:11 recess [7] - 34:4, 107:1, 161:13, 161:16, 164:11, 210:16, 211:11 Recess [2] - 34:6, 163:22 recognition [1] - 77:24 recognize [18] - 22:1, 64:25, 69:19, 70:17, 73:14, 79:12, 80:20, 81:23, 92:10, 95:11, 113:9, 123:1, 139:5, 177:18, 188:14, 206:21, 208:5, 209:18 recollection [1] - 165:11 recommend [1] - 172:24 record [66] - 4:1, 26:7, 45:10, 53:1, 53:7, 64:25, 65:9, 65:22, 66:9, 66:25, 67:10, 69:2, 69:4, 69:21, 69:24, 70:10, 70:17, 73:16, 73:21, 79:12, 80:22, 81:18, 87:7, 88:15, 89:3, 90:12, 91:12, 92:10, 94:12, 96:8, 97:4, 98:11, 100:14, 101:25, 102:19, 127:7, 127:13, 127:25, 130:3, 132:23, 135:3, 137:10, 137:25, 138:1, 139:14, 139:15, 139:23, 159:7, 173:9, 177:18, 178:14, 184:3, 185:6, 195:13, 200:1, 201:14, 202:17, 204:25, 205:2, 205:5, 205:14, 206:21, 208:17, 210:25, 217:4 recorded [2] - 1:24, 157:23 recordkeeping [1] -	185:1 records [31] - 50:7, 66:2, 66:3, 72:9, 72:10, 74:16, 76:14, 81:11, 82:18, 96:4, 99:23, 102:20, 122:20, 136:3, 139:12, 174:25, 177:7, 177:10, 188:5, 188:17, 199:25, 203:8, 203:10, 203:12, 203:15, 203:24, 204:2, 204:5, 205:23, 209:5, 209:6 recover [1] - 4:22 recovery [1] - 6:1 recreate [2] - 153:22, 154:12 redirect [4] - 44:23, 168:5, 194:20, 201:20 Redirect [1] - 2:7 REDIRECT [1] - 168:8 redirected [1] - 154:19 Reese [3] - 16:11, 22:13, 23:20 refer [1] - 215:6 reference [9] - 14:20, 42:23, 43:1, 113:25, 116:11, 212:25, 213:4, 213:11, 215:16 referenced [3] - 14:15, 15:6, 72:4 referencing [1] - 115:15 referral [1] - 53:18 referred [3] - 4:16, 6:8, 11:25 refers [1] - 14:25 reflected [4] - 30:1, 136:5, 137:2, 201:14 refresh [1] - 165:11 refreshed [1] - 124:10 regarding [1] - 57:14 regardless [2] - 10:13, 114:1 regards [1] - 105:21 regular [1] - 7:17 reiterate [1] - 27:17 related [3] - 121:13, 140:14, 187:17 relates [1] - 26:16 relating [1] - 148:13	relation [1] - 11:3 relationship [2] - 5:16, 7:20 relaxed [1] - 8:15 released [2] - 62:15, 203:8 reliance [1] - 18:25 relied [2] - 8:16, 72:25 relief [1] - 6:2 Relief [2] - 6:12, 19:19 rely [2] - 5:5, 5:13 relying [2] - 12:20, 19:3 remember [8] - 48:17, 73:9, 122:16, 131:10, 159:22, 164:14, 169:22, 210:18 remind [2] - 98:24, 100:14 reminder [7] - 30:21, 115:23, 116:25, 117:1, 119:6, 120:9, 120:23 reminders [2] - 118:16, 121:7 remote [2] - 125:10, 203:22 rent [1] - 24:11 repay [2] - 13:3, 13:15 repeat [1] - 36:17 rephrase [1] - 170:24 replicate [1] - 154:15 report [6] - 101:8, 158:7, 181:20, 183:17, 191:8, 191:12 Report [2] - 183:9, 183:10 reporter [2] - 91:17, 174:1 REPORTER [1] - 217:2 Reporter [2] - 1:21, 217:8 reports [1] - 163:1 represent [4] - 126:2, 179:16, 180:17, 207:25 representation [1] - 59:10 representative [1] - 24:21 represents [4] - 18:4, 68:12, 126:15, 177:21 request [3] - 11:18,
Q				
quality [2] - 4:23, 62:14 query [5] - 81:13, 124:7, 124:15, 165:20 questioning [1] -	ran [1] - 121:20 rapidly [1] - 6:17 rather [4] - 43:9, 89:1, 95:5, 209:21 read [27] - 18:16, 18:18, 19:10, 19:12, 20:14, 28:11, 28:21, 28:25, 31:5, 66:4, 66:9, 66:25, 67:10, 67:21, 78:22, 86:14, 87:7, 90:12, 91:12, 94:12, 97:3, 103:1, 109:9, 115:19, 124:19, 205:14, 207:1 readable [1] - 133:24 reading [1] - 78:5 ready [4] - 3:18, 58:2, 211:13, 212:11 real [2] - 54:3, 82:9 realized [1] - 78:18 really [3] - 8:16, 49:5, 212:20 reason [4] - 193:25, 194:5, 199:16, 208:3 reasonable [1] - 169:24 reasons [2] - 60:24, 193:5 receive [8] - 19:15, 28:13, 39:5, 54:13, 55:10, 63:1, 150:24, 153:9 received [16] - 14:12, 14:17, 14:19, 14:21, 15:1, 15:2, 15:6, 32:12, 66:18, 80:11, 103:19, 114:21, 114:23, 151:8, 168:15,	215:25 Received [1] - 15:4 receiving [1] - 168:17 recent [1] - 46:23 recently [1] - 46:11 recess [7] - 34:4, 107:1, 161:13, 161:16, 164:11, 210:16, 211:11 Recess [2] - 34:6, 163:22 recognition [1] - 77:24 recognize [18] - 22:1, 64:25, 69:19, 70:17, 73:14, 79:12, 80:20, 81:23, 92:10, 95:11, 113:9, 123:1, 139:5, 177:18, 188:14, 206:21, 208:5, 209:18 recollection [1] - 165:11 recommend [1] - 172:24 record [66] - 4:1, 26:7, 45:10, 53:1, 53:7, 64:25, 65:9, 65:22, 66:9, 66:25, 67:10, 69:2, 69:4, 69:21, 69:24, 70:10, 70:17, 73:16, 73:21, 79:12, 80:22, 81:18, 87:7, 88:15, 89:3, 90:12, 91:12, 92:10, 94:12, 96:8, 97:4, 98:11, 100:14, 101:25, 102:19, 127:7, 127:13, 127:25, 130:3, 132:23, 135:3, 137:10, 137:25, 138:1, 139:14, 139:15, 139:23, 159:7, 173:9, 177:18, 178:14, 184:3, 185:6, 195:13, 200:1, 201:14, 202:17, 204:25, 205:2, 205:5, 205:14, 206:21, 208:17, 210:25, 217:4 recorded [2] - 1:24, 157:23 recordkeeping [1] -	185:1 records [31] - 50:7, 66:2, 66:3, 72:9, 72:10, 74:16, 76:14, 81:11, 82:18, 96:4, 99:23, 102:20, 122:20, 136:3, 139:12, 174:25, 177:7, 177:10, 188:5, 188:17, 199:25, 203:8, 203:10, 203:12, 203:15, 203:24, 204:2, 204:5, 205:23, 209:5, 209:6 recover [1] - 4:22 recovery [1] - 6:1 recreate [2] - 153:22, 154:12 redirect [4] - 44:23, 168:5, 194:20, 201:20 Redirect [1] - 2:7 REDIRECT [1] - 168:8 redirected [1] - 154:19 Reese [3] - 16:11, 22:13, 23:20 refer [1] - 215:6 reference [9] - 14:20, 42:23, 43:1, 113:25, 116:11, 212:25, 213:4, 213:11, 215:16 referenced [3] - 14:15, 15:6, 72:4 referencing [1] - 115:15 referral [1] - 53:18 referred [3] - 4:16, 6:8, 11:25 refers [1] - 14:25 reflected [4] - 30:1, 136:5, 137:2, 201:14 refresh [1] - 165:11 refreshed [1] - 124:10 regarding [1] - 57:14 regardless [2] - 10:13, 114:1 regards [1] - 105:21 regular [1] - 7:17 reiterate [1] - 27:17 related [3] - 121:13, 140:14, 187:17 relates [1] - 26:16 relating [1] - 148:13	relation [1] - 11:3 relationship [2] - 5:16, 7:20 relaxed [1] - 8:15 released [2] - 62:15, 203:8 reliance [1] - 18:25 relied [2] - 8:16, 72:25 relief [1] - 6:2 Relief [2] - 6:12, 19:19 rely [2] - 5:5, 5:13 relying [2] - 12:20, 19:3 remember [8] - 48:17, 73:9, 122:16, 131:10, 159:22, 164:14, 169:22, 210:18 remind [2] - 98:24, 100:14 reminder [7] - 30:21, 115:23, 116:25, 117:1, 119:6, 120:9, 120:23 reminders [2] - 118:16, 121:7 remote [2] - 125:10, 203:22 rent [1] - 24:11 repay [2] - 13:3, 13:15 repeat [1] - 36:17 rephrase [1] - 170:24 replicate [1] - 154:15 report [6] - 101:8, 158:7, 181:20, 183:17, 191:8, 191:12 Report [2] - 183:9, 183:10 reporter [2] - 91:17, 174:1 REPORTER [1] - 217:2 Reporter [2] - 1:21, 217:8 reports [1] - 163:1 represent [4] - 126:2, 179:16, 180:17, 207:25 representation [1] - 59:10 representative [1] - 24:21 represents [4] - 18:4, 68:12, 126:15, 177:21 request [3] - 11:18,

27:10, 211:10 requested [1] - 181:25 requesting [5] - 9:14, 9:15, 29:5, 160:25, 161:19 require [2] - 8:20, 59:7 required [21] - 19:13, 21:6, 21:23, 24:1, 24:9, 24:18, 29:6, 29:12, 55:25, 56:2, 56:16, 57:4, 74:20, 80:16, 88:25, 150:11, 153:13, 183:3, 183:4, 183:5, 193:7 requirements [6] - 8:11, 8:14, 8:20, 55:23, 60:7, 75:3 requires [1] - 9:2 requiring [1] - 115:21 Rescue [1] - 19:22 resent [1] - 86:9 resign [1] - 118:4 respect [20] - 35:2, 43:25, 52:14, 56:3, 62:4, 93:11, 104:7, 105:25, 117:22, 132:14, 144:4, 152:21, 152:24, 159:15, 176:13, 187:12, 198:17, 208:24, 213:3, 216:5 respectfully [1] - 215:22 respects [5] - 20:18, 24:5, 28:24, 31:3, 83:15 result [2] - 117:18, 195:5 results [1] - 65:4 resume [2] - 106:9, 202:11 resuming [1] - 210:16 retain [1] - 42:25 retry [1] - 181:21 return [2] - 22:3, 56:14 review [6] - 50:11, 63:4, 119:12, 153:11, 171:13, 203:15 reviewed [1] - 30:2 reviewing [1] - 157:12 right-hand [2] - 113:6, 181:8	Rivero [1] - 215:22 road [2] - 204:13, 210:3 Road [4] - 16:11, 22:13, 23:20, 27:6 role [8] - 7:5, 13:25, 47:1, 47:4, 47:7, 57:2, 174:24, 203:6 rose [1] - 11:19 roster [1] - 172:7 route [2] - 60:15, 68:21 routed [3] - 61:2, 69:8, 99:7 router [1] - 51:23 routing [5] - 60:21, 80:24, 82:22, 102:14, 117:18 row [7] - 123:6, 123:7, 125:6, 127:9, 127:14, 140:5, 156:23 rows [19] - 66:1, 67:2, 67:12, 68:4, 96:20, 96:24, 97:1, 97:6, 123:12, 124:16, 125:1, 126:23, 127:11, 130:6, 131:8, 133:14, 134:7, 134:15, 144:22 RPR [2] - 1:21, 217:7 rule [1] - 169:16 rules [7] - 5:14, 19:15, 19:23, 24:3, 28:12, 28:14, 30:25 ruling [3] - 211:14, 211:17, 213:3 run [1] - 146:23 running [1] - 182:25	SBA [92] - 4:17, 4:19, 4:20, 5:5, 5:8, 5:20, 6:1, 6:3, 6:14, 6:17, 7:5, 7:11, 7:18, 8:12, 8:24, 9:9, 11:16, 11:22, 11:25, 12:19, 12:22, 12:24, 13:1, 13:3, 13:10, 13:14, 13:16, 13:19, 13:22, 13:25, 15:20, 19:3, 20:6, 20:7, 20:20, 21:22, 22:24, 23:6, 24:1, 25:12, 25:16, 26:1, 26:8, 26:9, 29:13, 30:1, 30:7, 30:14, 32:10, 33:11, 33:12, 33:19, 35:21, 36:22, 36:23, 39:1, 43:25, 56:22, 57:1, 57:3, 58:24, 61:9, 62:21, 69:4, 69:7, 69:11, 82:1, 82:9, 85:15, 90:7, 90:10, 90:19, 90:21, 91:8, 92:14, 93:11, 93:14, 93:18, 98:6, 104:23, 107:20, 109:16, 110:2, 110:12, 110:13, 110:25, 111:18, 118:14, 121:15, 121:16, 149:8 SBA's [5] - 4:14, 12:10, 25:21, 31:16, 32:17 SBA-guaranteed [3] - 7:18, 8:24, 13:1 SBA-partnered [1] - 12:22 scan [1] - 77:24 scenario [1] - 106:17 Schaffer [3] - 172:9, 172:11, 211:3 Schedule [23] - 11:6, 22:3, 23:3, 29:16, 55:9, 56:10, 56:12, 56:13, 77:1, 77:8, 77:10, 78:13, 79:13, 80:6, 80:10, 80:15, 82:13, 90:24, 102:24, 103:8, 103:17, 105:4, 160:7 schedule [1] - 80:4 scheduled [1] - 164:3 scheduling [1] - 164:2	screen [55] - 8:17, 15:12, 15:15, 16:14, 43:23, 44:4, 44:15, 64:23, 69:15, 70:15, 79:10, 84:16, 84:17, 84:19, 95:12, 98:9, 98:20, 98:21, 103:14, 108:3, 109:12, 113:4, 113:6, 113:7, 115:5, 115:8, 116:5, 118:20, 118:25, 119:24, 121:11, 122:24, 123:12, 130:11, 140:20, 143:8, 154:1, 154:25, 155:13, 155:25, 156:3, 156:8, 156:10, 165:13, 177:16, 187:8, 187:9, 189:23, 195:18, 204:22, 204:23, 206:15, 206:17, 208:12, 208:14 screens [3] - 14:8, 14:10, 180:14 scroll [2] - 155:3, 155:4 scrolling [2] - 190:17, 208:7 SDK [2] - 176:9, 176:16 search [7] - 65:4, 95:16, 96:12, 205:19, 205:22, 206:5, 206:12 searched [3] - 95:22, 95:25, 96:2 searches [1] - 206:24 searching [1] - 61:14 seat [5] - 3:25, 45:9, 95:7, 173:8, 202:16 seated [3] - 161:18, 212:10, 212:22 second [28] - 25:21, 59:23, 61:15, 79:25, 93:15, 117:25, 136:16, 137:5, 152:14, 157:3, 160:10, 166:20, 171:25, 178:17, 180:6, 182:7, 193:19, 193:20, 196:20, 198:20, 200:9, 200:12, 207:19, 211:5, 212:7, 213:8	seconds [10] - 86:24, 86:25, 112:5, 157:12, 157:16, 158:1, 158:20, 158:24, 159:13, 172:21 section [21] - 16:13, 18:16, 20:2, 20:3, 20:7, 23:23, 23:25, 30:23, 31:11, 57:14, 68:6, 77:4, 77:14, 78:10, 79:3, 107:14, 108:5, 108:14, 155:18, 178:8, 192:6 security [13] - 16:17, 16:24, 22:15, 29:21, 55:6, 66:24, 67:3, 96:2, 96:17, 150:11, 178:22, 191:25, 198:13 Security [2] - 6:12, 19:20 see [192] - 15:17, 26:8, 29:15, 31:12, 38:4, 38:6, 40:23, 41:15, 58:15, 58:22, 61:2, 64:22, 65:18, 66:1, 66:7, 66:21, 67:16, 69:15, 70:14, 71:5, 72:5, 72:7, 72:17, 76:2, 76:20, 77:7, 77:15, 77:17, 78:11, 78:13, 79:3, 79:10, 79:20, 79:23, 81:21, 83:16, 83:18, 84:17, 84:20, 84:22, 85:9, 85:18, 85:20, 85:22, 85:24, 86:4, 87:1, 87:11, 89:15, 90:15, 94:10, 95:12, 96:20, 96:22, 97:13, 98:8, 98:21, 99:19, 100:12, 100:25, 102:8, 102:17, 102:23, 103:13, 103:25, 104:2, 104:4, 104:20, 105:11, 106:3, 107:9, 107:11, 107:14, 108:2, 108:14, 108:21, 109:12, 109:23, 111:11, 111:23, 113:7, 114:7, 114:12, 114:15,
S				
	S21 [2] - 207:24, 209:9 safe [3] - 210:17, 210:20, 216:20 Samsung [5] - 184:25, 186:24, 196:21, 200:15, 209:9 San [1] - 46:1 sanctions [1] - 183:11 saved [2] - 58:12, 140:13 saw [5] - 80:3, 103:10, 105:3, 185:11, 196:25			

115:6, 115:9, 115:13, 116:5, 116:12, 117:2, 118:20, 118:24, 119:21, 119:24, 120:17, 121:10, 122:5, 122:23, 125:7, 125:21, 126:4, 126:18, 126:20, 127:2, 127:4, 127:14, 129:3, 129:18, 129:20, 130:6, 130:11, 133:15, 134:10, 135:4, 135:13, 136:1, 136:16, 137:17, 138:2, 138:12, 139:3, 140:19, 141:21, 141:23, 142:1, 142:4, 142:23, 143:7, 143:25, 144:23, 145:23, 146:9, 146:14, 146:25, 147:3, 152:12, 153:15, 153:16, 153:18, 154:16, 157:3, 159:5, 162:21, 163:6, 163:12, 163:16, 163:17, 164:11, 164:19, 166:4, 166:7, 168:14, 171:6, 171:9, 173:5, 177:16, 178:2, 178:23, 179:1, 179:12, 180:7, 180:10, 181:12, 181:22, 183:1, 185:24, 186:8, 186:9, 186:16, 187:10, 188:1, 191:6, 192:5, 193:2, 193:13, 195:18, 196:7, 197:25, 200:6, 204:23, 204:24, 205:18, 206:5, 206:19, 207:3, 207:7, 207:20, 208:15, 208:25 seeing [1] - 131:2 seeking [1] - 211:20 selected [1] - 82:24 selection [1] - 82:23 selfie [15] - 179:4, 180:4, 180:5, 181:14, 181:20,	182:2, 182:6, 190:15, 190:19, 192:9, 192:22, 193:14, 198:19, 199:5, 199:18 selfies [1] - 178:24 sell [2] - 4:25, 175:13 send [12] - 54:12, 56:5, 56:8, 74:18, 80:24, 81:2, 100:23, 112:13, 113:15, 114:12, 115:23, 118:16 sending [1] - 54:4 sends [1] - 154:21 senior [1] - 203:4 sent [54] - 50:15, 54:21, 61:9, 61:16, 63:21, 64:2, 66:14, 82:21, 86:2, 86:8, 89:6, 89:12, 89:17, 93:23, 94:1, 102:13, 104:14, 108:19, 108:23, 108:24, 112:4, 112:15, 112:21, 112:24, 114:17, 115:16, 116:1, 116:16, 116:18, 116:20, 117:7, 117:10, 118:14, 119:17, 119:21, 120:11, 120:13, 121:1, 121:4, 121:7, 121:24, 122:2, 122:5, 122:8, 131:13, 132:9, 136:8, 143:21, 144:5, 168:13, 168:20, 169:20, 170:3 sentence [2] - 156:1, 156:6 separate [8] - 23:8, 27:23, 64:7, 81:9, 81:10, 195:13, 198:2, 198:5 September [1] - 46:15 seriously [1] - 212:21 server [4] - 187:19, 187:21, 187:22, 196:14 service [10] - 9:23, 52:1, 56:1, 56:19, 59:19, 176:14, 176:22, 203:4, 203:20, 203:21 services [5] - 4:25, 174:7, 175:8,	176:4, 203:18 session [56] - 160:19, 161:9, 162:25, 180:13, 180:15, 180:19, 183:16, 183:19, 184:9, 184:13, 184:15, 184:17, 184:19, 184:24, 185:7, 185:10, 185:13, 185:16, 185:21, 185:24, 186:4, 186:8, 186:15, 188:1, 188:20, 188:22, 188:24, 189:3, 189:6, 189:8, 190:2, 190:3, 190:4, 190:16, 190:20, 190:22, 190:25, 191:1, 196:2, 196:3, 196:5, 196:7, 196:9, 196:11, 196:20, 196:24, 196:25, 197:4, 197:8, 197:12, 197:16, 198:23, 200:2, 200:9, 200:11 sessions [14] - 180:7, 180:9, 180:12, 180:17, 183:21, 184:6, 187:2, 189:13, 190:7, 192:16, 195:9, 195:14, 195:21, 198:21 set [5] - 94:25, 111:6, 127:12, 131:3, 181:24 settings [2] - 150:11, 181:24 seven [4] - 192:18, 195:21, 197:16, 202:9 several [12] - 14:6, 60:6, 147:23, 150:13, 152:21, 152:23, 160:2, 160:3, 180:2, 193:7, 200:23, 216:20 share [6] - 29:8, 81:14, 112:23, 151:7, 168:20, 169:3 shareable [1] - 169:2 shares [1] - 21:19 sheet [14] - 124:4, 136:11, 136:17,	136:19, 136:21, 137:3, 137:4, 137:5, 137:19, 140:22, 140:25, 145:22, 145:25, 165:12 sheets [2] - 140:12, 143:10 short [11] - 34:2, 54:5, 54:7, 66:18, 125:10, 131:9, 150:25, 158:19, 163:17, 169:22, 170:10 short-lived [5] - 54:5, 54:7, 66:18, 131:9, 169:22 shorthand [1] - 83:22 shortly [1] - 86:11 show [34] - 9:17, 9:20, 11:7, 16:3, 71:3, 71:19, 72:9, 72:10, 74:22, 74:25, 75:1, 75:16, 92:11, 98:15, 101:9, 110:16, 122:22, 131:21, 136:2, 142:17, 143:14, 146:4, 153:19, 154:13, 156:13, 158:4, 167:20, 187:6, 187:23, 199:1, 199:4, 199:20, 204:20, 209:10 showed [6] - 143:15, 143:17, 159:19, 159:23, 159:24, 200:1 showing [17] - 17:19, 21:18, 37:1, 75:13, 99:23, 113:10, 118:19, 136:23, 137:5, 139:2, 140:6, 142:4, 152:14, 155:1, 158:7, 204:21, 204:22 shown [2] - 142:11, 180:14 shows [12] - 65:7, 75:8, 101:4, 102:14, 139:8, 144:9, 146:2, 146:5, 146:22, 188:17, 199:5, 207:5 shut [1] - 6:25 sic [2] - 29:10, 39:5 side [30] - 13:22,	19:25, 84:17, 84:19, 84:22, 98:19, 98:20, 113:4, 113:6, 113:12, 115:8, 116:5, 118:19, 118:25, 119:23, 187:7, 187:9, 189:23, 204:22, 204:23, 205:18, 206:15, 206:16, 206:17, 206:18, 206:19, 208:12, 208:13, 209:3 sidebar [2] - 172:4, 202:3 sign [36] - 24:18, 24:24, 25:1, 25:16, 25:17, 42:16, 42:19, 43:22, 44:3, 44:7, 51:23, 62:18, 63:1, 63:6, 64:7, 90:7, 90:10, 94:7, 109:3, 112:8, 119:7, 119:9, 119:12, 119:14, 120:23, 152:17, 153:2, 153:3, 153:7, 153:12, 153:20, 154:21, 157:13, 164:22 signature [23] - 25:14, 29:3, 29:9, 31:6, 58:25, 63:7, 63:11, 84:2, 84:4, 84:5, 88:8, 88:25, 92:2, 93:2, 94:19, 107:11, 107:15, 108:19, 110:19, 111:11, 155:10, 155:16, 155:21 signatures [3] - 42:12, 42:14, 59:19 signed [40] - 21:14, 25:1, 31:4, 61:10, 61:11, 61:17, 69:8, 69:12, 84:6, 84:8, 86:2, 86:11, 86:12, 86:22, 87:6, 88:10, 89:8, 89:10, 89:21, 92:19, 92:22, 93:4, 93:6, 93:21, 94:5, 94:22, 98:6, 108:25, 109:22, 109:24, 110:21, 110:25, 111:8, 112:5, 158:1, 158:8, 170:4, 171:7, 171:10 signer [8] - 85:17,
---	---	--	---	---

85:20, 108:15, 110:23, 110:24, 111:23, 111:25, 156:20 signing [34] - 25:5, 59:16, 59:17, 61:7, 62:10, 62:21, 63:14, 63:18, 64:3, 64:9, 84:10, 85:1, 85:3, 88:23, 89:7, 93:18, 94:15, 108:5, 108:12, 152:21, 152:25, 155:15, 155:17, 157:23, 158:13, 158:15, 159:10, 164:24, 165:4, 170:7, 170:19, 171:3, 174:19, 174:20 Signing [1] - 157:8 signs [2] - 24:25, 155:8 silent [1] - 147:19 similar [17] - 27:8, 54:18, 54:19, 87:15, 95:14, 97:16, 97:18, 98:11, 102:19, 105:18, 109:18, 158:4, 164:18, 191:8, 191:18, 195:12, 199:25 similarly [1] - 194:14 simple [2] - 77:22, 123:22 single [7] - 123:5, 172:21, 177:22, 179:18, 179:20, 180:13, 200:8 site [2] - 176:12, 176:15 sitting [1] - 124:13 situation [2] - 28:7, 106:15 six [4] - 88:20, 192:7, 192:8, 197:12 sized [1] - 208:6 slate [1] - 13:14 slow [1] - 151:16 SM [6] - 136:2, 145:13, 147:7, 186:24, 196:23, 200:15 SM-986 [1] - 145:13 SM-986U [1] - 147:7 SM-G998U [2] - 136:2, 186:24 SM-N986U [4] - 145:13, 147:7,	196:23, 200:15 small [14] - 4:21, 5:5, 5:10, 5:20, 6:2, 6:17, 7:10, 7:24, 8:1, 8:5, 35:9, 38:23, 46:10, 48:10 Small [7] - 3:12, 4:10, 4:12, 4:16, 19:17, 19:20, 32:15 Smith [1] - 1:19 SMS [2] - 54:22, 144:5 SNIDER [80] - 1:13, 3:10, 3:12, 14:23, 45:6, 45:14, 64:17, 64:19, 94:24, 95:4, 95:8, 95:10, 106:19, 106:24, 107:4, 107:5, 147:11, 147:14, 160:23, 161:1, 161:6, 161:8, 161:19, 161:24, 162:3, 162:6, 162:17, 163:5, 163:7, 163:14, 163:19, 163:21, 165:7, 168:5, 168:9, 169:14, 169:18, 171:1, 171:15, 171:18, 171:22, 173:13, 173:25, 193:16, 194:17, 194:21, 194:22, 200:16, 201:20, 201:25, 202:3, 202:5, 202:8, 202:12, 202:14, 202:21, 209:16, 210:7, 210:12, 211:10, 211:16, 211:18, 211:25, 212:11, 213:24, 214:1, 214:5, 214:11, 214:14, 214:17, 214:19, 214:21, 214:25, 215:8, 215:11, 215:20, 215:22, 216:3, 216:17, 216:22 Snider [2] - 106:14, 159:19 Snider..... [1] - 2:7 Snider..... [3] - 2:6, 2:8, 2:10 so.. [1] - 202:11 social [15] - 16:16, 16:23, 22:14,	22:15, 29:21, 55:6, 66:24, 67:2, 96:2, 96:17, 178:22, 191:25, 198:13 software [14] - 45:21, 45:22, 46:9, 46:10, 47:4, 47:12, 48:1, 48:4, 62:7, 62:14, 174:18, 176:8, 176:10, 176:11 sole [22] - 9:25, 10:8, 10:11, 10:25, 11:3, 15:25, 16:17, 22:7, 25:6, 26:25, 37:19, 38:1, 38:16, 39:11, 39:12, 39:13, 40:1, 40:5, 41:2, 46:12, 56:14, 56:21 someone [28] - 9:10, 34:20, 36:9, 39:21, 41:16, 42:16, 43:22, 44:6, 51:8, 53:14, 53:16, 53:20, 65:6, 84:12, 137:1, 149:10, 149:12, 150:2, 150:3, 150:12, 150:14, 151:8, 155:8, 162:19, 167:15, 167:19, 167:25, 180:13 sometimes [1] - 150:10 somewhere [2] - 73:21, 103:6 soon [1] - 37:2 Sorry [1] - 61:13 sorry [38] - 5:24, 7:25, 18:18, 36:17, 40:12, 40:13, 47:9, 48:2, 61:4, 64:17, 71:18, 74:10, 74:25, 78:3, 86:13, 90:8, 104:16, 109:5, 126:15, 131:3, 145:13, 147:7, 148:1, 149:24, 156:8, 158:13, 160:10, 160:16, 162:19, 162:20, 166:23, 167:18, 169:12, 180:23, 197:21, 216:18 sort [13] - 8:8, 48:20, 48:25, 53:18, 81:14, 103:2, 153:18, 156:16, 181:22, 196:24, 204:8, 204:12	sought [1] - 215:20 sounds [1] - 53:8 sources [1] - 57:18 south [1] - 4:15 South [2] - 4:11, 162:24 SOUTHERN [1] - 1:1 Southern [1] - 217:9 spaces [1] - 158:1 speaking [2] - 7:10, 172:5 specific [12] - 10:10, 12:6, 65:5, 69:22, 114:11, 114:16, 154:5, 176:21, 176:23, 179:18, 187:19, 206:24 specifically [13] - 26:6, 48:1, 48:5, 119:8, 125:14, 152:25, 154:9, 154:11, 176:3, 177:6, 214:11, 214:13, 215:6 specifics [1] - 121:19 specified [1] - 216:7 specifies [1] - 56:14 speculation [1] - 170:23 speed [2] - 25:18, 98:21 spell [4] - 4:1, 45:10, 173:9, 202:17 spelled [3] - 45:12, 48:19, 202:19 spend [2] - 9:4, 213:18 spent [6] - 24:9, 32:2, 33:2, 33:3, 157:11, 159:3 split [1] - 84:16 spreadsheet [8] - 123:21, 123:22, 131:12, 131:21, 159:21, 159:22, 165:18, 208:5 spring [1] - 11:8 SSN [4] - 66:21, 95:16, 95:22, 95:25 stage [1] - 97:11 stamp [9] - 74:1, 86:4, 89:4, 99:18, 137:11, 159:24, 184:1, 184:2, 189:1 Stamp [1] - 92:25 stamped [3] - 89:3, 92:1, 93:17 stamps [11] - 89:15, 94:1, 108:21, 109:8, 112:3,	136:23, 156:18, 156:21, 187:4, 188:19, 189:22 standing [1] - 95:8 stands [2] - 70:22, 98:24 start [13] - 4:21, 18:19, 55:4, 58:4, 86:15, 113:11, 115:7, 135:9, 145:2, 147:22, 180:18, 192:6, 214:2 started [5] - 3:8, 58:13, 160:5, 161:13, 196:11 starting [7] - 3:18, 53:15, 129:25, 135:11, 138:8, 143:4, 190:12 starts [1] - 142:2 startups [1] - 45:24 state [8] - 3:25, 32:7, 32:22, 33:8, 45:10, 48:2, 173:9, 202:16 statement [19] - 9:23, 20:19, 55:24, 55:25, 56:7, 75:13, 75:18, 76:2, 76:4, 76:7, 76:12, 101:11, 101:20, 102:2, 102:7, 138:10, 138:18, 208:18, 209:11 statements [10] - 9:20, 19:12, 19:13, 20:4, 55:16, 59:12, 75:7, 76:14, 76:17, 83:10 states [1] - 211:22 STATES [3] - 1:1, 1:3, 1:11 States [8] - 1:14, 1:22, 3:22, 178:21, 191:25, 202:14, 203:13, 217:8 status [8] - 117:16, 128:1, 128:2, 128:5, 128:8, 171:11, 171:12, 212:24 status-checking [1] - 171:11 stay [3] - 162:23, 163:8, 163:10 staying [1] - 164:5 Steinbeisser [2] - 217:6, 217:7 STEINBEISSER [1] - 1:21
---	--	---	--	--

stenography ^[1] - 1:24 stenotype ^[1] - 217:5 Step ^[1] - 119:13 step ^[13] - 53:14, 53:16, 54:10, 54:25, 106:13, 115:24, 140:6, 142:17, 154:2 step-by-step ^[1] - 54:10 steps ^[2] - 55:13, 193:13 still ^[9] - 8:16, 11:1, 23:11, 38:19, 117:15, 119:9, 167:20, 167:24, 212:2 stop ^[5] - 36:4, 58:4, 106:8, 130:22, 149:10 store ^[3] - 50:1, 55:19, 126:13 stored ^[3] - 50:3, 50:7, 52:11 strange ^[1] - 117:17 streamline ^[1] - 49:5 string ^[1] - 133:25 structured ^[1] - 7:16 subcounts ^[1] - 214:14 submit ^[8] - 58:2, 58:3, 179:8, 180:2, 180:3, 181:17, 193:1, 199:13 submits ^[1] - 199:12 submitted ^[20] - 19:16, 20:24, 21:7, 25:21, 33:15, 33:20, 178:12, 178:20, 181:3, 181:17, 182:14, 188:18, 189:2, 190:1, 191:19, 191:24, 192:4, 192:8, 198:13, 214:7 submitting ^[2] - 179:7, 201:1 subscriber ^[2] - 205:3, 205:6 subsequent ^[2] - 213:3, 215:17 subset ^[2] - 70:1, 98:15 substantiate ^[1] - 9:24 succeed ^[1] - 4:21 succeeded ^[1] - 199:6	success ^[3] - 174:15, 174:16, 174:17 successful ^[24] - 131:19, 131:22, 131:23, 132:3, 132:8, 132:13, 133:1, 134:16, 136:5, 138:25, 144:10, 144:13, 144:15, 145:6, 181:6, 181:20, 182:6, 182:20, 194:23, 199:2, 199:9, 199:21, 199:23, 200:9 succinct ^[1] - 214:23 suggest ^[6] - 148:4, 159:1, 159:3, 200:25, 201:3, 201:8 suggested ^[1] - 201:1 suggestion ^[1] - 173:4 suggests ^[1] - 157:11 sum ^[1] - 23:24 summarize ^[5] - 28:10, 28:16, 28:21, 30:23, 81:14 summarizes ^[2] - 102:13, 156:17 summary ^[13] - 55:13, 65:7, 69:23, 70:20, 73:17, 76:23, 80:23, 98:13, 100:15, 101:3, 156:21, 156:24, 156:25 SunTrust ^[1] - 75:14 superseded ^[1] - 213:21 supplied ^[2] - 67:5, 198:8 support ^[3] - 27:10, 59:6, 203:5 supported ^[1] - 22:21 supporting ^[10] - 9:16, 9:18, 11:3, 13:19, 14:1, 20:16, 22:8, 30:4, 30:11, 83:14 suppose ^[1] - 36:25 supposed ^[1] - 24:2 sustained ^[1] - 169:17 switching ^[1] - 8:10 sworn ^[4] - 3:24, 45:8, 173:7, 202:15 system ^[18] - 41:17, 47:18, 67:20,	78:15, 97:9, 124:3, 133:12, 133:13, 133:22, 134:18, 135:17, 145:14, 146:8, 147:8, 159:16, 167:6, 167:12, 205:4 systems ^[6] - 43:21, 48:24, 54:15, 70:12, 174:25, 189:16	166:13 tenders ^[1] - 147:11 term ^[8] - 9:25, 10:2, 10:18, 43:14, 51:10, 176:8, 176:17, 213:13 terms ^[5] - 77:22, 80:24, 127:10, 167:6, 204:8 test ^[1] - 62:10 tested ^[1] - 62:15 testified ^[10] - 17:9, 18:25, 34:16, 50:16, 68:20, 100:20, 128:25, 131:9, 211:23, 211:24 testifies ^[1] - 215:23 testify ^[3] - 161:21, 203:7, 203:16 testifying ^[2] - 211:1, 213:10 testimony ^[9] - 122:13, 152:16, 161:23, 161:24, 162:2, 172:13, 210:2, 211:19, 214:15 testing ^[3] - 62:6, 62:8, 63:11 Texas ^[1] - 211:21 text ^[6] - 37:16, 54:22, 54:23, 77:24, 150:25, 168:14 THAKRAL ^[2] - 2:5, 45:8 Thakral ^[18] - 45:7, 45:11, 45:15, 56:22, 61:24, 64:14, 64:20, 64:22, 69:17, 81:20, 107:6, 112:12, 122:13, 147:14, 147:17, 155:22, 164:14, 170:1 THE ^[123] - 1:10, 1:12, 1:15, 3:2, 3:11, 3:14, 3:16, 3:23, 3:25, 4:2, 14:10, 14:21, 14:24, 15:9, 15:17, 31:9, 33:25, 34:2, 34:8, 36:15, 36:16, 36:17, 44:22, 44:24, 45:1, 45:3, 45:5, 45:9, 45:11, 95:3, 95:5, 106:8, 106:13, 106:22,	106:25, 107:3, 147:13, 160:14, 160:17, 160:22, 160:25, 161:4, 161:7, 161:12, 161:18, 161:23, 162:1, 162:5, 162:8, 162:12, 162:15, 162:19, 162:21, 163:4, 163:6, 163:10, 163:16, 163:20, 163:24, 164:8, 166:22, 168:4, 168:7, 169:11, 169:12, 169:16, 170:24, 171:16, 171:19, 172:1, 172:11, 172:16, 172:18, 172:24, 173:3, 173:5, 173:8, 173:10, 173:22, 173:24, 193:12, 193:13, 194:16, 194:19, 200:18, 201:19, 201:22, 201:24, 202:4, 202:6, 202:9, 202:13, 202:16, 202:18, 209:15, 210:8, 210:11, 210:14, 210:15, 210:22, 211:5, 211:15, 211:17, 211:23, 212:4, 212:15, 212:18, 212:20, 213:25, 214:4, 214:10, 214:13, 214:16, 214:18, 214:20, 214:23, 215:5, 215:10, 215:14, 215:21, 216:1, 216:12, 216:18 themselves ^[3] - 59:14, 59:15, 179:19 thereafter ^[1] - 86:11 they've ^[3] - 46:9, 106:2, 117:16 third ^[5] - 42:21, 185:10, 194:4, 207:25, 208:7 thousand ^[3] - 10:15, 38:8, 40:25 thousands ^[2] - 118:1, 215:13 three ^[31] - 32:24, 33:1, 65:25, 66:2,
---	--	---	---	--

66:3, 66:5, 67:2, 67:3, 67:12, 67:24, 68:4, 68:9, 68:16, 68:18, 69:13, 97:19, 99:21, 109:5, 136:24, 140:12, 148:18, 174:11, 174:24, 181:17, 182:9, 190:2, 190:3, 190:4, 190:16, 196:24, 198:14 throughout [1] - 4:14 Thursday [3] - 160:18, 160:20, 162:25 tie [1] - 30:16 TIN [2] - 17:4, 42:6 tired [2] - 212:17, 212:21 title [8] - 21:12, 21:19, 25:5, 46:17, 46:18, 46:23, 183:15, 203:4 Title [2] - 19:19, 19:21 titled [1] - 178:8 today [12] - 122:13, 160:24, 161:2, 161:21, 163:9, 170:13, 174:22, 203:16, 210:23, 211:12, 211:21, 211:23 together [1] - 7:21 toll [3] - 204:13, 210:3 tomorrow [2] - 162:24, 211:24 tonight [1] - 162:4 took [5] - 3:6, 182:9, 200:23, 201:7, 213:15 top [16] - 15:22, 16:13, 18:14, 21:4, 23:15, 31:12, 84:22, 92:9, 93:8, 95:19, 105:10, 107:24, 115:5, 119:8, 179:13, 179:24 total [10] - 17:6, 27:14, 27:21, 32:3, 35:5, 82:12, 87:19, 105:1, 110:5, 180:4 towards [1] - 7:10 tower [1] - 187:19 track [7] - 26:10, 50:17, 50:19, 50:21, 53:1, 53:6,	131:17 Tracy [61] - 1:19, 26:23, 26:24, 27:2, 29:9, 29:17, 29:20, 30:17, 31:5, 32:13, 37:4, 37:8, 37:17, 41:15, 42:3, 65:6, 65:12, 70:5, 75:19, 79:13, 82:3, 82:11, 84:7, 85:23, 87:14, 88:11, 89:11, 91:6, 92:7, 92:12, 93:5, 93:22, 97:17, 98:12, 99:2, 101:13, 102:2, 102:20, 105:18, 105:25, 106:21, 138:17, 139:25, 140:14, 140:18, 142:16, 148:1, 159:17, 164:19, 167:15, 167:20, 167:24, 178:1, 179:21, 191:4, 205:9, 206:1, 206:4, 206:14, 208:23, 209:7 TRACY [1] - 1:7 tracyw [3] - 118:10, 119:21, 122:5 tracyw764 [2] - 117:10, 120:14 tracyw764@gmail. com [7] - 65:24, 89:14, 93:25, 113:21, 115:17, 121:5, 122:3 tracywade.pdf [1] - 79:8 trade [3] - 16:3, 23:17, 27:1 traditional [1] - 8:12 traffic [2] - 3:4, 3:17 train [1] - 8:8 training [1] - 4:24 transact [1] - 183:12 transaction [14] - 124:21, 124:23, 125:1, 125:5, 125:16, 126:3, 127:21, 127:24, 141:6, 141:8, 141:17, 141:18 transactional [1] - 112:16 transactions [17] - 52:5, 75:14, 123:4, 123:7, 125:18, 126:25, 129:20, 130:7, 139:12,	141:1, 141:4, 141:21, 141:23, 142:1, 165:16, 166:4, 167:5 TRANSCRIPT [1] - 1:10 transcript [1] - 1:24 transcription [2] - 1:25, 217:4 transfers [1] - 35:21 transform [1] - 124:16 Treasury [1] - 19:18 TRIAL [1] - 1:10 trials [1] - 203:8 tried [7] - 49:5, 132:24, 138:22, 138:24, 195:3, 195:5, 201:12 tries [4] - 131:4, 195:3, 195:4, 201:2 true [13] - 20:17, 22:22, 24:4, 25:22, 28:24, 30:5, 31:2, 83:15, 131:19, 131:23, 144:12, 151:4, 159:6 trust [1] - 5:15 truthful [5] - 9:8, 59:4, 59:7, 80:16, 103:23 truthfulness [1] - 59:10 try [14] - 60:5, 60:9, 162:22, 182:3, 182:7, 192:14, 194:25, 197:22, 200:12, 202:13, 204:21, 213:7, 213:15, 214:23 trying [10] - 44:6, 146:23, 149:7, 151:18, 155:22, 162:13, 164:10, 165:23, 204:20, 212:9 Tuesday [3] - 202:11, 210:17, 211:12 turned [1] - 14:10 turning [1] - 155:2 TW [1] - 155:23 twice [1] - 138:17 two [65] - 10:22, 10:23, 17:3, 18:15, 19:9, 20:23, 23:13, 25:18, 31:12, 57:18, 74:10, 86:9, 91:10, 92:5, 93:13, 96:4, 96:20, 97:14, 97:21, 98:4, 98:7,	99:4, 99:7, 100:9, 101:4, 101:14, 107:15, 114:18, 118:9, 120:20, 129:22, 136:13, 138:6, 143:10, 148:17, 164:10, 165:1, 165:5, 166:4, 166:5, 168:19, 172:25, 180:5, 180:17, 184:19, 185:13, 187:6, 188:25, 190:7, 196:7, 196:9, 196:25, 204:21, 206:25, 207:5, 208:3, 211:1, 211:7, 211:18, 213:7, 213:17, 214:7, 214:14, 214:16, 214:17 type [38] - 8:20, 10:3, 15:23, 26:24, 49:16, 51:3, 56:20, 76:24, 77:25, 83:5, 98:16, 99:1, 102:19, 105:21, 120:1, 127:2, 134:2, 134:18, 137:13, 137:17, 146:5, 146:16, 147:8, 159:7, 178:19, 184:13, 184:23, 185:2, 185:21, 191:23, 196:4, 196:19, 197:2, 198:12, 200:14, 203:18, 204:25, 211:4 types [6] - 11:17, 45:23, 152:23, 175:15, 175:19, 180:2 typically [2] - 54:8, 151:1 typing [1] - 135:4 typo [2] - 78:19, 78:20 U ultimate [2] - 51:23, 153:17 ultimately [3] - 56:5, 199:23, 200:9 Ultra [2] - 207:24, 209:9 unclear [1] - 138:25 uncomfortable [1] -	106:14 under [15] - 19:15, 19:18, 20:20, 20:21, 20:23, 20:25, 28:14, 39:11, 39:12, 41:4, 54:8, 85:20, 108:15, 203:9, 206:1 undergrad [1] - 47:18 underlined [2] - 18:15, 19:8 underlying [1] - 48:23 underscore [2] - 125:10, 126:17 understood [1] - 152:16 underwriting [5] - 5:12, 5:13, 5:14, 8:11, 8:17 underwrote [1] - 48:21 unfiltered [1] - 130:16 unique [14] - 13:9, 17:1, 21:20, 26:9, 31:16, 32:17, 67:18, 67:19, 84:25, 85:2, 132:23, 141:6, 179:17, 191:11 UNITED [3] - 1:1, 1:3, 1:11 United [8] - 1:14, 1:22, 3:22, 178:21, 191:25, 202:14, 203:13, 217:8 universal [2] - 71:25, 188:11 unsuccessful [1] - 131:24 unusual [5] - 3:17, 34:19, 34:22, 117:17, 117:25 up [28] - 13:3, 14:15, 20:22, 33:7, 39:6, 60:10, 63:1, 63:4, 68:6, 78:6, 104:8, 120:16, 154:18, 160:12, 160:13, 164:3, 167:20, 174:19, 174:20, 190:2, 190:3, 190:16, 190:20, 190:25, 195:16, 212:11, 212:12, 212:16 update [2] - 125:6, 127:25
---	--	--	---	--

updated ^[1] - 78:10 updates ^[1] - 123:8 upload ^[11] - 52:18, 55:8, 55:18, 56:2, 73:22, 80:12, 136:25, 146:4, 146:14, 146:20, 182:17 uploaded ^[26] - 52:15, 55:16, 55:21, 57:20, 58:22, 58:23, 59:6, 73:17, 73:24, 74:5, 74:6, 74:11, 75:8, 76:15, 77:19, 79:5, 79:6, 80:6, 101:5, 101:23, 138:6, 146:9, 159:17, 159:25, 160:7 uploading ^[4] - 74:17, 138:10, 138:16, 138:17 uploads ^[4] - 52:15, 146:2, 146:25, 147:4 upper ^[1] - 181:7 US ^[1] - 4:10 USAA ^[2] - 75:18, 102:3 usability ^[1] - 49:1 USC ^[3] - 20:21, 20:23, 20:25 user ^[82] - 36:6, 36:20, 41:18, 41:20, 44:3, 55:17, 57:18, 57:24, 61:16, 62:18, 62:20, 66:19, 67:5, 67:14, 73:4, 73:18, 77:3, 77:4, 77:9, 77:11, 78:8, 78:16, 78:18, 78:19, 78:20, 80:1, 80:13, 81:5, 82:8, 100:16, 100:21, 102:24, 104:7, 115:21, 126:7, 126:9, 126:10, 131:4, 131:8, 132:11, 133:19, 135:1, 136:2, 137:6, 137:8, 137:17, 137:18, 142:12, 146:6, 146:19, 146:24, 149:23, 149:24, 149:25, 151:5, 156:2, 167:4, 167:5, 167:7, 167:9, 167:10, 167:22,	170:19, 171:2, 175:13, 176:19, 177:22, 177:24, 178:12, 178:22, 179:7, 182:14, 183:19, 193:1, 195:3, 198:7, 199:12, 209:6 user's ^[5] - 50:22, 66:24, 81:6, 81:15, 176:23 user-supplied ^[1] - 67:5 users ^[11] - 62:16, 121:14, 151:14, 167:2, 167:3, 174:18, 175:12, 175:22, 176:7, 178:19, 181:17 users' ^[1] - 174:8 uses ^[5] - 12:22, 24:6, 24:14, 35:19, 36:21 usual ^[1] - 34:22 UTC ^[10] - 71:4, 71:22, 71:24, 116:19, 122:6, 122:10, 129:24, 188:9, 188:10, 196:10 utilities ^[1] - 24:13	181:10, 181:24, 182:6, 182:12, 182:16, 182:20, 182:24, 182:25, 183:8, 185:3, 185:5, 189:1, 189:9, 189:25, 190:1, 190:13, 190:14, 190:15, 190:19, 190:24, 191:14, 192:8, 192:11, 192:17, 192:19, 193:6, 193:8, 193:10, 194:11, 199:1, 199:5, 199:12, 199:15, 199:21, 200:24, 201:8 verifications ^[9] - 175:20, 177:3, 179:25, 180:3, 188:17, 189:2, 189:4, 192:6, 198:17 verified ^[12] - 54:4, 54:16, 54:24, 71:1, 71:3, 71:19, 71:21, 73:3, 99:13, 99:15, 99:17, 177:25 verify ^[14] - 54:10, 54:17, 54:20, 138:22, 174:8, 174:18, 175:22, 176:5, 176:7, 176:19, 176:22, 177:22, 193:18, 201:13 verifying ^[2] - 100:21, 179:19 Verizon ^[9] - 202:25, 203:12, 203:19, 203:20, 203:24, 204:5, 204:15, 204:18, 209:23 Verizon's ^[6] - 203:8, 203:10, 205:3, 207:14, 210:1, 210:4 version ^[2] - 133:23 versions ^[1] - 139:8 versus ^[2] - 175:18, 188:21 VGvQ ^[1] - 179:22 via ^[13] - 53:17, 54:22, 59:19, 63:7, 86:8, 89:1, 91:24, 92:19, 95:16, 100:16, 117:20, 138:18, 155:20 vice ^[2] - 46:18, 46:19	view ^[1] - 167:6 viewed ^[7] - 86:10, 86:16, 89:19, 94:3, 108:25, 112:5, 170:3 viewing ^[1] - 170:7 viewpoint ^[2] - 6:14, 12:10 visible ^[5] - 44:8, 44:15, 63:13, 94:15, 94:18 vs ^[1] - 1:5	43:7, 102:20, 104:11, 105:25, 111:3, 142:18, 148:1, 148:2, 164:15, 164:17, 164:18, 167:21, 167:24, 206:4 Wades' ^[1] - 148:13 wait ^[1] - 213:2 walk ^[3] - 53:10, 65:9, 178:14 watch ^[1] - 172:25 watched ^[1] - 211:5 Watchlist ^[2] - 183:9 ways ^[3] - 4:23, 168:19, 172:25 weather ^[1] - 163:1 web ^[2] - 133:23, 176:16 website ^[56] - 48:16, 48:17, 48:21, 48:22, 48:23, 48:24, 49:24, 50:2, 50:15, 50:17, 50:19, 50:23, 52:3, 52:6, 52:18, 52:20, 52:21, 53:12, 53:17, 54:14, 55:19, 56:17, 57:6, 57:8, 57:19, 57:21, 64:12, 67:7, 77:3, 77:13, 80:7, 82:8, 87:6, 117:21, 124:24, 131:17, 132:12, 132:14, 142:18, 149:18, 151:3, 151:14, 151:15, 151:22, 151:24, 152:1, 152:3, 152:5, 153:10, 153:11, 153:12, 153:14, 154:17, 170:17, 171:2, 176:10 Wednesday ^[1] - 160:20 week ^[7] - 60:21, 160:20, 160:21, 211:11, 211:12, 212:13, 212:17 welcome ^[2] - 154:20, 212:20 well-tested ^[1] - 62:15 West ^[1] - 27:6 whereas ^[1] - 143:16 whole ^[11] - 67:21, 153:23, 154:12, 154:16, 156:5, 156:7, 156:8,
W				
Wade ^[106] - 1:18, 1:19, 16:2, 16:5, 16:19, 21:9, 22:6, 22:11, 23:16, 23:18, 23:22, 25:2, 25:4, 26:5, 26:23, 26:24, 27:2, 29:9, 29:17, 29:20, 30:17, 31:5, 32:13, 32:21, 33:8, 37:4, 37:8, 37:9, 37:16, 37:17, 42:3, 65:6, 65:13, 70:5, 75:15, 75:19, 79:13, 82:3, 82:11, 84:7, 85:23, 87:14, 88:11, 89:11, 91:6, 92:7, 92:12, 93:5, 93:22, 96:5, 97:17, 98:12, 98:13, 98:17, 99:2, 101:13, 102:2, 102:3, 102:14, 103:18, 104:25, 105:19, 106:21, 107:17, 108:16, 110:14, 110:24, 111:16, 112:1, 138:17, 139:25, 140:15, 140:18, 141:2, 141:19, 142:14, 142:16, 148:22, 149:1, 152:20, 157:23, 159:18, 164:19, 167:15, 178:1, 179:21, 191:4, 191:15, 195:5, 198:6, 200:1, 200:23, 201:6, 205:9, 206:1, 206:14, 208:23, 209:7, 213:16, 214:2, 214:7 WADE ^[2] - 1:7, 1:7 Wade's ^[15] - 41:15,				
V				
V.A ^[1] - 1:19 valid ^[1] - 54:8 value ^[9] - 77:9, 77:11, 77:12, 77:18, 78:2, 103:1, 205:19, 206:6, 206:12 various ^[7] - 24:13, 46:21, 63:6, 65:7, 83:9, 86:7, 141:1 vendor ^[4] - 72:23, 72:25, 81:10, 100:18 Venues ^[1] - 19:21 verification ^[60] - 55:12, 72:21, 72:22, 72:24, 81:8, 81:15, 81:17, 81:18, 104:10, 169:21, 173:21, 174:7, 175:3, 175:18, 176:4, 176:24, 177:8, 179:3, 179:20, 180:3, 180:18, 181:4, 181:6,				

165:4, 197:20, 197:22 WILCOX [31] - 1:17, 15:15, 33:24, 34:1, 34:10, 36:19, 44:18, 45:2, 45:4, 147:16, 160:16, 162:10, 162:14, 163:3, 164:12, 164:13, 165:9, 165:10, 166:20, 166:23, 166:25, 168:3, 170:22, 193:11, 200:20, 201:17, 202:2, 210:10, 212:14, 212:16, 212:19 Wilcox [3] - 162:6, 162:8, 212:18 Wilcox's [1] - 172:20 Wilcox..... [3] - 2:4, 2:6, 2:9 willing [2] - 5:9, 163:7 window [1] - 150:25 windows [1] - 170:10 Windows [7] - 123:17, 133:13, 134:5, 134:19, 134:21, 146:21, 196:6 wipe [1] - 13:14 wire [1] - 215:12 witness [32] - 3:9, 3:20, 3:24, 14:17, 15:6, 44:24, 45:3, 45:7, 45:8, 147:12, 161:4, 161:7, 161:9, 161:20, 162:2, 162:3, 162:15, 163:13, 163:14, 163:15, 164:9, 171:20, 173:7, 194:19, 201:20, 202:1, 202:4, 202:15, 212:7, 212:23, 213:9 WITNESS [11] - 4:2, 36:15, 36:17, 45:11, 162:5, 169:11, 173:10, 173:24, 193:13, 202:18, 210:14 WITNESSES [1] - 2:2 witnesses [2] - 211:1, 211:18 Womply [128] - 46:2, 46:4, 46:6, 46:9, 46:14, 46:15,	46:20, 46:21, 47:22, 48:1, 48:4, 48:9, 48:16, 49:5, 49:14, 49:16, 49:19, 49:23, 50:1, 50:10, 50:11, 50:16, 50:19, 50:22, 50:25, 51:1, 52:2, 52:5, 52:11, 52:15, 53:8, 53:20, 55:21, 56:19, 57:2, 59:3, 59:7, 59:13, 59:17, 59:23, 60:2, 60:3, 60:4, 60:5, 60:6, 60:11, 60:13, 60:15, 61:14, 62:5, 62:10, 62:17, 62:22, 63:1, 63:11, 65:10, 69:25, 70:1, 72:24, 73:21, 75:7, 76:14, 76:15, 76:17, 76:24, 80:6, 80:10, 80:14, 80:16, 80:17, 81:5, 81:11, 82:6, 82:7, 82:8, 84:12, 84:13, 92:16, 95:22, 96:2, 100:3, 100:4, 101:22, 102:21, 103:19, 112:13, 112:17, 113:2, 115:3, 115:23, 117:15, 118:16, 121:20, 122:14, 124:23, 126:9, 131:17, 133:1, 133:7, 137:1, 145:19, 147:25, 148:1, 148:23, 149:8, 149:13, 151:21, 151:22, 151:24, 152:5, 159:15, 175:23, 175:25, 176:1, 176:3, 176:5, 176:13, 176:15, 176:25, 177:3, 177:4, 181:25, 182:2, 182:17, 195:2, 197:21 Womply's [22] - 47:4, 52:21, 53:11, 53:25, 55:18, 56:17, 57:21, 64:12, 70:12, 97:9, 101:23, 114:4, 114:5, 124:3, 132:14, 136:3, 140:7, 142:8, 142:18, 170:16, 171:2, 179:3	womply.com [1] - 48:19 Wompu [1] - 147:24 wondering [1] - 164:2 word [4] - 58:11, 126:12, 149:15, 187:21 words [2] - 58:4, 160:22 wore [1] - 11:16 workers [1] - 42:25 works [4] - 35:24, 154:2, 164:6, 182:25 workspace [1] - 113:14 Workspace [3] - 113:22, 113:25, 114:3 worse [1] - 162:24 write [4] - 91:17, 124:8, 124:15, 155:19 writing [2] - 20:1, 165:22 written [1] - 158:17 wrongdoing [2] - 200:25, 201:9 wrote [6] - 124:5, 124:7, 124:9, 165:21	129:8 zeroes [1] - 127:4 ZL8 [1] - 185:24 zone [9] - 71:23, 72:1, 72:4, 90:2, 90:4, 109:8, 188:5, 188:7
		Y	
		year [17] - 10:21, 16:6, 16:8, 16:20, 27:3, 27:10, 29:16, 71:7, 76:25, 77:8, 82:16, 87:23, 91:2, 103:17, 105:6, 203:2, 209:23 Year's [2] - 16:7, 27:4 years [6] - 20:22, 20:23, 21:1, 174:11, 174:24, 175:14 yesterday [3] - 14:11, 14:21, 212:8 York [4] - 187:22, 187:23, 196:15, 196:17 yourself [2] - 15:14, 62:1	
		Z	
		zero [4] - 127:6, 127:7, 127:15,	