

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA
3 CRIMINAL DIVISION
4 CASE NO. 23-CR-60173 WILLIAMS (GRAHAM)

5 UNITED STATES OF AMERICA, Miami, Florida
6 Plaintiff, May 14, 2024
7 vs. 9:49 AM - 4:01 PM
8 CAROLYN D. WADE,
9 Defendant. Pages 1 to 228

10
11 TRANSCRIPT OF TRIAL
12 HELD BEFORE THE HONORABLE DONALD L. GRAHAM
13 UNITED STATES DISTRICT JUDGE
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17

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1 (Call to the Order of the Court.)

2 (Jury enters at 9:49 AM.)

3 THE COURT: Good morning, ladies and gentlemen. We
4 tried to give you fair warning about the traffic yesterday. I
5 believe two or three of you were late. We don't call any
6 names out on the first day. We don't try to make up the time
7 on the first day, but we do want you to be on time because we
8 actually do start on time and we try to finish precisely on
9 time.

10 So we appreciate your cooperation. Thank you.

11 You may continue cross-examination.

12 CONTINUED CROSS-EXAMINATION

13 BY MR. WILCOX:

14 Q. Good morning, Ms. Embrey.

15 A. Good morning.

16 Q. How are you?

17 A. I'm doing well. Thank you. And you?

18 Q. I believe yesterday you testified that you were a trial
19 attorney with the Small Business Administration?

20 A. That's correct.

21 Q. What kind of trials?

22 A. Different types of trial. We do -- I think I believe I
23 said affirmative litigation, defense of litigation. So that
24 means when SBA brings suit against someone or an entity, I
25 assist the United States Attorney's Office in that. I'm also

1 a Special Assistant United States Attorney, which means that
2 for any civil matters involving SBA, I could be the lead
3 attorney here in the Southern District of Florida. I also do
4 FOIA litigation -- I'm sorry.

5 Q. I'm sorry. I was just trying to ask you but you don't
6 prosecute?

7 A. Not at all, no. I --

8 Q. Go ahead. You can continue.

9 A. I also do Freedom of Information Act litigation. I do
10 administration litigation both in SBA itself in their office
11 of hearing and appeals as well as some in federal district
12 court -- and a lot of other stuff over the years, I'm sure
13 that's there. But no, I have never practiced criminal law,
14 no.

15 Q. Did you provide the Government with any memorandums of
16 reports in preparation for your testimony?

17 A. No.

18 Q. And have you testified in other Paycheck Protection
19 Program fraud trials?

20 A. I have testified in two criminal trials involving PPP,
21 aside from this one.

22 Q. Now, were you subpoenaed by the Government in this trial?

23 A. The agency was, and I was named as their witness, yes.

24 Q. And were you asked to bring any documents or any files?

25 A. No.

1 Q. Now, I want to publish -- this has already been admitted
2 into evidence again -- Exhibit 117.

3 You were not involved in the processing of this
4 application, were you?

5 A. No.

6 Q. And you have had no direct contact with Carolyn Wade?

7 A. No, I have not.

8 Q. Never spoke to her over the phone?

9 A. No.

10 Q. Never communicated with her via computer or email?

11 A. No.

12 Q. You never had any text message conversations with
13 Ms. Wade?

14 A. No, sir.

15 Q. Now, I believe that you testified on direct examination
16 that it was not unlawful for a small business owner to hire
17 someone to assist them with preparing a Paycheck Protection
18 Program loan.

19 A. That's correct.

20 Q. Okay. And you also testified that it wasn't unlawful for
21 someone to use the proceeds from the Paycheck Protection
22 Program loan to pay anyone who assisted the borrower in the
23 preparation of the, let's just say, PPP loan application?

24 A. That's correct.

25 Q. Okay. So if I was a small business owner and I hired

1 someone to prepare my PPP loan application and I agreed to pay
2 them a thousand dollars but I didn't pay them until after I
3 got the loan, would that be unlawful?

4 A. It would depend.

5 Q. Yeah, it would depend -- yeah, it would depend on what?

6 A. It would depend on how the proceeds of the Paycheck
7 Protection Program were used.

8 Q. Okay. But if I have a thousand dollars in another account
9 or I've had a thousand dollars somewhere else when I got the
10 loan, how would you be able to discern that the thousand
11 dollars is coming from the loan or from my own personal funds?

12 A. Well, I'm not a forensic accountant, so I don't know. I
13 mean, I would assume we would have to look at the books and
14 the records and the checking account and make a determination
15 as -- to trace the funds.

16 Q. I understand that.

17 So if Ms. Wade paid somebody a thousand dollars to
18 prepare this particular PPP loan application, you can't say
19 that that was unlawful based on what you know?

20 A. I'm sorry. Can you repeat that?

21 Q. You don't know whether or not Ms. Wade -- if she paid
22 someone a thousand dollars to prepare this loan whether that
23 act was unlawful or not?

24 A. Do I know? No, I do not.

25 Q. Okay. Now, based on your experience, is it unusual for a

1 borrower -- a small business owner -- to hire someone to help
2 them or assist them in their preparation of a PPP loan
3 application?

4 A. Are you asking me if it is unusual?

5 Q. Yes, I am.

6 A. Oh. I've heard of it. I've heard that people do, sure.

7 Q. I mean, it's not unusual, is it?

8 A. I wouldn't say it's usual or unusual.

9 Q. Okay. It happens?

10 A. It can happen, yes.

11 Q. Okay. You've seen it before; is that right?

12 A. Yes, and I have heard of it before, yes.

13 Q. All right. And if you know, would it be fair to say that
14 people like tax preparers are the type of people that would
15 help someone prepare these loans?

16 A. That, I wouldn't know. It would be up to the small
17 business to determine who it wants to help it.

18 Q. Now, the indictment in this case alleges that Ms. Wade
19 submitted or caused the submission of a materially false PPP
20 loan application. You don't know whether or not Ms. Wade is
21 the person that submitted this application; is that correct?

22 A. No, I don't.

23 Q. Okay. And Exhibit 118 that was introduced yesterday, the
24 forgiveness -- the forgiveness application, you don't know if
25 she submitted that one either; is that right?

1 A. No, I do not.

2 Q. I mean, her name is on there, but it could have been
3 submitted by someone she hired to prepare it; right?

4 A. Again, I wouldn't know.

5 Q. Exactly. You don't know. You don't know whether she
6 submitted it or someone she hired to prepare the loan
7 submitted it; is that right?

8 A. That's right.

9 Q. Okay. And if she hired someone -- I apologize, Your
10 Honor.

11 Now, there are DocuSign initials CW on the PPP loan
12 application; is that correct?

13 A. Yes, that's correct.

14 Q. He showed that to you yesterday.

15 But if she hired someone to prepare her PPP loan
16 application and she provided that person with her DocuSign
17 account login information, that person could have DocuSigned
18 the loan for her, couldn't they?

19 A. Could they have? Potentially, yes.

20 MR. WILCOX: Okay. One moment, Your Honor.

21 No further questions, Your Honor. Thank you.

22 REDIRECT EXAMINATION

23 BY MR. SNIDER:

24 Q. Good morning, Ms. Embrey.

25 A. Good morning.

1 Q. Ms. Embrey, you were just asked a question about DocuSign
2 by Mr. Wilcox?

3 A. Yes.

4 Q. The DocuSigning that occurred in the PPP program, that was
5 not something that the SBA was administering or initiating,
6 was it?

7 A. No, it was not.

8 Q. And as a trial attorney for the small business
9 administration, do you have knowledge about how the
10 specific --

11 MR. WILCOX: I'm going to object to the leading, Your
12 Honor.

13 THE COURT: Overruled.

14 MR. SNIDER: I'm just laying a foundation.

15 BY MR. SNIDER:

16 Q. As the trial attorney for the Small Business
17 Administration, given what your role was, as you've testified,
18 did you have any involvement with the DocuSign process as it
19 related to the PPP program?

20 A. No, I did not.

21 Q. Do you have personal knowledge about how the DocuSign
22 program was executed in the PPP program?

23 A. No, I do not.

24 MR. SNIDER: Thank you. No further questions.

25 THE COURT: May the witness be permanently excused?

1 MR. SNIDER: She may, Your Honor. Thank you.

2 THE COURT: Defense? May the witness be permanently
3 excused?

4 MR. WILCOX: Yes.

5 THE COURT: All right. You are excused. Thank you.
6 Please call your next witness.

7 MR. SNIDER: The United States calls Aman Thakral.
8 (Government witness, AMANDEEP THAKRAL, duly sworn.)

9 COURT CLERK: If you can please state your name and
10 spell it for the record.

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

14 DIRECT EXAMINATION

15 BY MR. SNIDER:

16 Q. Mr. Thakral, good morning.

17 A. Good morning.

18 Q. How are you doing this morning?

19 A. I'm well. Thank you.

20 Q. Good.

21 Can you tell the jury what you're currently doing for
22 work?

23 A. So currently I'm a consultant.

24 Q. Who are you a consultant for?

25 A. My client is Womply.

1 Q. What's Womply?

2 A. Womply is a company that participated as a technology
3 company for the Paycheck Protection Program and as well as
4 they had their own software business providing small business
5 software to small businesses.

6 Q. What type of consulting work are you doing for Womply?

7 A. My focus is primarily on data so that -- it's gathering
8 data and also providing analyses on that data.

9 Q. As a technology company, does Womply have a lot of data?

10 A. Yes.

11 Q. So you're a consultant now. Did you ever previously work
12 for Womply?

13 A. Yes. I was formerly an employee of Womply.

14 Q. And when were you employed directly by Womply?

15 A. From September 2020 through till March 2022.

16 Q. Mr. Thakral, what's your educational background?

17 A. I've got degrees in engineering, so I've got a bachelor's
18 in engineering as well as a master's in engineering.

19 Q. And what kind of engineering is that? Is that, like,
20 building buildings or something else?

21 A. Sure. So my undergraduate degree was a double major in
22 chemical engineering and bioengineering, and then my master's
23 degree, I focused on what are known as process systems.

24 Q. Does that relate to computers and technology?

25 A. Yeah. I was using computers extensively to solve

1 engineering problems.

2 Q. And, again, when you say engineering, you're relating to,
3 like, the computer-type engineering?

4 A. Well, in this case it was chemical engineering problems,
5 but I was writing mathematical software to help solve those
6 kinds of problems. So I was using computers to solve chemical
7 engineering problems.

8 Q. Okay. So was Womply involved in something called the
9 Paycheck Protection Program?

10 A. Yes. I stated that earlier.

11 Q. Okay. Sorry if I missed that.

12 So explain to the jury what Womply's role was in the
13 Paycheck Protection Program.

14 A. Womply's role was to collect data from users, primarily
15 sole proprietors, that is, single-person businesses, and to
16 help them to be connected with a lender to eventually try and
17 get a loan as a part of the Paycheck Protection Program.

18 Q. Okay. So it collected information?

19 A. Correct.

20 Q. And how did it do that? Was it by mail or some other way?

21 A. So the entire platform was done online. It was an online
22 platform.

23 Q. And when you were an employee of Womply, what was your
24 title there?

25 A. My title was the VP of financial products.

1 Q. Okay. What did you do as the VP of financial products for
2 Womply?

3 A. So my job was to help design and build systems for
4 financial products for Womply.

5 Q. Did you as an employee of Womply have a role in the PPP
6 program that Womply was involved in?

7 A. Yes, I built the underlying system that collected the
8 data.

9 Q. Do you have familiarity with the PPP program --

10 A. Yes.

11 Q. -- and basically what it was?

12 A. Yes.

13 Q. And as someone who built the program, the platform, do you
14 have familiarity with Womply's systems as it related to the
15 Paycheck Protection Program?

16 A. Yes, I do.

17 Q. Are you familiar with the type of information that Womply
18 collected?

19 A. Yes.

20 Q. Are you familiar with the type of documents that Womply
21 collected? And what I am talking about now is just
22 specifically related to the Paycheck Protection Program.

23 A. Yes. I wrote the software to collect all this data.

24 Q. Are you familiar with the application process through
25 Womply's system?

1 A. Yes.

2 Q. Did Womply have databases to store all this digital
3 information?

4 A. Extensive. Yes.

5 Q. And are you familiar with those databases?

6 A. Yes.

7 Q. Did those databases create records of the data?

8 A. Yes.

9 Q. Are you familiar with those records?

10 A. Yes. I designed them.

11 Q. By the way, did Womply have a website --

12 A. Yes.

13 Q. -- for the Paycheck Protection Program?

14 A. Yeah. The users went to a website called

15 pppfastlane.womply.com. So it's spelled

16 P-P-P-F-A-S-T-L-A-N-E, one word, .womply.com.

17 Q. When a user went to that website -- if it wanted to enter
18 the website, was a login required?

19 A. There was no direct login required. The authentication
20 was done using a short-lived verification code, and it was
21 done using both email and phone. So both were required to
22 initially sign up. And then after signup, one would be
23 required, generally speaking.

24 Q. Did Womply through its systems keep track of logins into
25 its website?

1 A. Yes.

2 Q. Applications for the Paycheck Protection Program, could
3 those be started on Womply's website?

4 A. Yes.

5 Q. Did Womply keep track of when applications were created?

6 A. Yes.

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

8 A. Yes.

9 Q. Can you explain that to the jury?

10 A. So it's a mechanism for us to track changes to a given
11 record. For example, when someone initially signs in and
12 starts their application and they put in some basic
13 information, such as their name and address, that would be one
14 entry into the log.

15 If they changed their record in any way, we would
16 also track those changes. So say, for example, they just
17 stopped there, then they come in the next day and they provide
18 some information about their business. We would track that as
19 well.

20 And so with those records, we are keeping track of
21 the time stamp that the modification to the record was made or
22 the creation or the deletion, depending on the nature of the
23 record, as well as the IP address that the user came from when
24 they made that change. And this is -- we were tracking not
25 only -- not only sort of applicants coming in but if we had

1 internal users who were making changes, we were also doing an
2 internal audit.

3 So we had a comprehensive log to make sure that we
4 knew if a piece of data was added or changed, where it came
5 from, and also by whom.

6 Q. And did Womply do that for all the activity on its website
7 with respect to the PPP?

8 A. Yes. That's correct.

9 Q. And those were stored on Womply's databases?

10 A. Sorry. Correction. On the systems that I built, they
11 had. I can't speak for the other systems.

12 Q. The ones that you are familiar with?

13 A. Correct.

14 Oh, and just one additional note. We did also store
15 user IDs. So whenever a user signs up, they were assigned a
16 unique user ID. We also stored the user ID that made the
17 change to the record.

18 Q. We're going to go through examples of all that.

19 Let's talk first about the PPP application process
20 and the experience that a PPP applicant would have had at
21 Womply -- or using Womply's website. So explain to the jury
22 how it started. Someone wanted to obtain a PPP loan through
23 Womply. What was the first step?

24 A. Yeah. So, typically, they would get some sort of
25 marketing material or a referral code from a friend or

1 something like that. So they had to get some way to get to
2 know about Womply. From that marketing material or email
3 referral or whatever, they would go to the website which I
4 stated before, that is, pppfastlane.womply.com, and there
5 would be a button to sign up. And then once they signed up,
6 they could start a new application.

7 Q. Okay. Your answers, I think, are -- the speed is fine,
8 but I just want to make sure that the court reporter is able
9 to get everything.

10 Are you okay?

11 THE STENOGRAPHER: If the witness could slightly
12 pause before answering the questions, that would help.

13 THE WITNESS: I apologize.

14 BY MR. SNIDER:

15 Q. No, no. That's fine. I want just to make sure the jury
16 can follow every word you're saying and that the court
17 reporter can take it all down.

18 So go to the website and what information is put in?

19 A. So first when you sign up, it's relatively basic. It's
20 like other websites where you put in some basic contact
21 information -- in this case both your email and phone number.
22 We would verify both of those pieces of information by sending
23 you a code either to your mobile device via SMS -- sorry --
24 actually both. So sending a code to your mobile device via
25 SMS as well as to your email address, and then you would type

1 those codes into the website, and that would complete the
2 signup process.

3 You would then start an application. With that
4 application, you would fill out some basic information. So,
5 for example, some personal information about your identity,
6 who you are and where you live, some information about your
7 business. If there was a tradename or something, you could
8 put that in. Your business category.

9 You'd also provide us with some documents. The
10 main --

11 Q. Let's take those one at a time because -- we'll go --

12 A. Sure.

13 Q. So -- let's back up to the verification.

14 A. Yeah.

15 Q. Is it your testimony that you had to verify both an email
16 address and a phone number?

17 A. Yes.

18 Q. Why was that?

19 A. It was -- for us it was a form of creating a two-factor
20 authentication mechanism. For security purposes, you want to
21 have more than one way to know who the person is. So,
22 generally speaking, with passwords it's either something you
23 know, something you have, or something you are. We were not
24 using the something you know, which is a password, or the
25 something you are, which is a biometrics signal.

1 We were relying primarily on something you have,
2 which is an email address as well as a phone number.

3 Q. So once that had been verified, both the email and the
4 phone number, then you could start putting in the information
5 that you were beginning to describe?

6 A. Correct.

7 Q. And you started describing some biographical information?

8 A. Yeah.

9 Q. Give us a few examples of that.

10 A. So first name, last name, address, date of birth, Social
11 Security number. I believe, off the top of my head, those are
12 the primary ones that we collected.

13 Q. Okay. We'll show you some examples of that too.

14 And then you had to provide some general information
15 about the business that was applying for this PPP loan?

16 A. Yeah. Correct. And that information was primarily the
17 name of the business. So some businesses have a trade name or
18 a d/b/a that they use. So they would provide that to us as
19 well as a business category.

20 Q. Was there any information about a bank account that had to
21 be supplied?

22 A. Yes, as part of the application process, you -- you could
23 either link a bank account directly, that is, provide your
24 credentials to a server known as Plaid. And so you would link
25 a bank account through Plaid, which is a service that we use

1 to collect that information, or alternatively you could
2 provide us with a bank statement and a voided check, and we
3 could use that information as well, but I think we saw only
4 about 10 percent of people actually did the latter. It was
5 primarily using Plaid is the main way that we collected the
6 bank account information.

7 Q. Were there ever instances where Womply received both the
8 credentials for the bank account through this Plaid service
9 and a bank statement?

10 A. Yeah, sometimes users would do both because they were
11 unsure of what they were doing, and so they would sometimes
12 provide both even if both were not necessary. If we had both,
13 it didn't harm the application in any way. And so in this
14 case it was just an extra assurance for them that Womply had
15 all the details that they needed.

16 Q. How about instructions on where to send the money if the
17 PPP loan was approved? Where did that information come from?

18 A. So that came in from Plaid. So through Plaid we were
19 collecting -- I would say three types of data primarily. The
20 first one was an account and routing number; that is, where is
21 the money going. This is coming verified from Plaid because
22 Plaid is connecting directly to the user's financial
23 institution.

24 Q. Who supplies the information to Plaid?

25 A. So, first, the applicant would supply their login

1 credentials to Plaid and then Plaid would send those
2 credentials to the financial institution and then the
3 financial institution would then essentially say, okay, these
4 login credentials are correct. You now have access to the
5 users' accounts.

6 And then so with those accounts, they would -- we
7 would get -- again, it's to verify account and routing
8 numbers. We would also get transaction data if it was
9 available. We would also get some identity information around
10 the ownership of the account. And depending on the financial
11 institution, either some or all of this data was available.

12 Q. And, essentially, that data told Womply where to send the
13 money --

14 A. Yes.

15 Q. -- which account --

16 A. Correct.

17 Q. And, by the way, I should say not where Womply would send
18 the money but where the lender would?

19 A. Yes. Correct.

20 Q. So what about tax documents? Did Womply require any
21 submission of tax documents in connection with the Paycheck
22 Protection Program application process?

23 A. Yes. Tax documents were required as part of the PPP
24 program per the SBA. The SBA allowed two different tax years,
25 either tax year 2019 or tax year 2020. And the specific

1 documents that they requested were part of a user's 1040. And
2 that is Schedule C or a Schedule F from those two tax years
3 that I said.

4 Q. Did Womply do any type of identity verification of the
5 person who was applying for the PPP loan?

6 A. Yes.

7 Q. What kind of identity verification?

8 A. It changed a little bit throughout the program, but I
9 would say the -- for the bulk of the program, the main
10 mechanism was using a service called Persona.

11 Q. And just generally, what -- or do you know what Persona
12 did?

13 A. Yes.

14 So the way that Persona worked is the user would --
15 the user would start a session on our website. They would be
16 redirected to Persona, and Persona would then get the
17 information about their SSN, date of birth, name, address,
18 et cetera, from us. They would ask the user to upload a -- or
19 to take a photo. I can't remember the exact version. But
20 either way, the user would provide a driver's license.

21 And then they would also do what's known as a live
22 selfie check. So in realtime, the user would take their
23 mobile device and put it in front of their face and they would
24 look ahead, look left, look right, to verify that they're also
25 a real person.

1 Q. Are you familiar with a document called an SBA
2 Form 2483-C?

3 A. Yes.

4 Q. What is that?

5 A. That is the application to actually get a loan from the
6 SBA.

7 Q. The information that was being supplied through Womply's
8 website that you just described -- the biographical
9 information, the information about the business -- where did
10 that information get put?

11 A. Ultimately, the main -- the only way to apply for the loan
12 with the SBA would be to complete this form. And so Womply's
13 job was to provide a platform to enter data and then
14 automatically fill out this form for that.

15 Q. Okay. So the information that a user was putting in --

16 A. Yeah.

17 Q. -- got put onto this SBA Form --

18 A. Correct.

19 Q. -- 2483?

20 A. Correct -- 2483-C.

21 Q. 2483-C.

22 Did the tax documents that you testified about -- the
23 Schedule C in particular, are you familiar with that form?
24 Have you seen it before?

25 A. Yes.

1 Q. Was a PPP applicant required to provide accurate and
2 truthful information to Womply?

3 A. Yes.

4 Q. Was the borrower or applicant required to provide accurate
5 tax documents to Womply?

6 A. Yes.

7 Q. In connection with the Paycheck Protection Program
8 application, was the borrower required to certify that all the
9 information that was being supplied through Womply's website
10 to be put on this 2483-C form was accurate and true?

11 A. Yes.

12 Q. Now, once Womply had collected all this information --
13 biographical, the business, the bank account, verified the
14 identity, tax information -- what did Womply do next?

15 A. So Womply would review the -- review the information that
16 they received. They would go through either some sort of
17 verification or validation process of the data. If everything
18 looked to be in order, they would then kind of package up this
19 data and then send it to a lender, at which point the lender
20 would decide whether or not they want to go ahead and submit
21 this application for funding --

22 Q. Let me stop you right there. So you said Womply did a
23 validation to make sure it all looked in order? Is that --

24 A. Well, so I said it was either a verification or a
25 validation, depending on the nature of the data.

1 Q. Okay. Did Womply do anything to check whether the
2 underlying data that had been submitted was accurate?

3 A. It depends on the data.

4 Q. Okay. Did it do anything, for example, like independent
5 due diligence, for example, on the tax information?

6 A. On the tax side, no. There's no way to verify the actual
7 details of the tax document itself as far as I know. But we
8 did just sort of validate that the numbers that they were
9 entering were consistent with what was on the tax form.

10 Q. Okay.

11 A. So it was a form of validation, not verification.

12 Q. Validation, not verification?

13 A. (Nods head.)

14 Q. In the process of sending this package to a lender once
15 everything had been completed, did the application at some
16 point need to be signed?

17 A. Yes.

18 Q. Are you familiar with the manner in which PPP applications
19 through Womply were signed?

20 A. Yes.

21 Q. How were they signed?

22 A. We used a service known as DocuSign.

23 Q. Are you familiar with that service?

24 A. Yes.

25 Q. Okay. We're going to walk through that in a second.

1 If a lender initially was unable to fund the loan
2 that was being applied for, what would Womply do?

3 A. Womply would have to find another lender.

4 Q. In that process -- finding another lender -- do you know
5 whether or not this DocuSign application had to be signed
6 again?

7 A. Yes. The Form 2483-C, that was required to be signed --
8 was a per lender signature required.

9 Q. Per lender, okay.

10 So there would have been a second DocuSign event?

11 A. Only if the loan was withdrawn or canceled or declined by
12 the lender.

13 Q. So if it had to go to a second lender, there would have
14 been a second DocuSign?

15 A. Correct.

16 Q. Okay. Let's talk about the DocuSign process. You just
17 testified a moment ago you're familiar with it?

18 A. Mm-hmm.

19 Q. Have you used it before?

20 A. Yes.

21 Q. Have you used it professionally?

22 A. Yes.

23 Q. Did Womply do any testing of the DocuSign process that was
24 executed through Womply's service?

25 A. Yes. That was part of our, broadly speaking, end-to-end

1 testing protocol.

2 Q. What does end-to-end mean?

3 A. It means that we would test our software from the very
4 first touch that the user came in all the way through the
5 signing.

6 Q. So Womply actually tested what the user would have
7 experienced during a DocuSign --

8 A. That's standard practice at Womply, yes.

9 Q. That's standard practice?

10 A. Yes.

11 Q. How does one receive a document from Womply that needs to
12 be DocuSigned?

13 A. So they would receive a link in their email address.

14 Q. Which email address?

15 A. The one that they signed up with as a user.

16 Q. Okay. Keep going.

17 A. And so they would receive an email from DocuSign and then
18 that would take them to the DocuSign website where they would
19 see a copy of the form with the data filled out. They would
20 have to -- I think in this case probably just enter in two
21 pieces of information. One would be they would have to draw
22 or type in a set of initials and then draw or type in a
23 signature that they want to use for that document.

24 Then they would review the document. And as they're
25 reviewing the document, they would see -- I believe it was

1 yellow -- a yellow indicator of where to sign.

2 Q. Did Womply have any other process to transmit a document
3 that needed to be DocuSigned other than to have an email sent
4 to the email on record with the link?

5 A. Not that I'm aware of.

6 Q. And when you go to sign, based on both your knowledge of
7 having used DocuSign and through Womply's testing, do you know
8 when you go to sign whether there's sort of options about what
9 type of signature you want to use or how you want it to look?

10 A. Yes. So as I stated before, it's typically either -- you
11 can either type it in or you can hand-draw it.

12 Q. When a DocuSign is in the process of being signed -- let
13 me rephrase that.

14 When a document is being signed via DocuSign, what is
15 visible to the signer?

16 A. What's visible to the signer would be no different than
17 what they would do kind of signing in person. They would have
18 all the information shown to them, and they would have
19 sections where they would need to initial or sign. In this
20 case, the initialling or signing would be done via a click on
21 the screen or within the relevant segment of the document
22 instead of actually using a pen to initial.

23 Q. When the signing process is completed through DocuSign, is
24 there anything that happens?

25 A. Once the document is signed or -- executed is another word

1 for it -- so upon document execution, the user would get an
2 email with the executed document in their inbox, typically.

3 Q. And what email would that executed document be sent to?

4 A. It would go to the same email that they received the
5 original link from.

6 Q. Mr. Thakral, we're now going to go through some documents
7 that are already in evidence in this case.

8 A. Okay.

9 Q. Can we publish my computer screen, the HDMI? Thank you.

10 Okay. Mr. Thakral, I have published for you and the
11 jury and the whole court what is in evidence as Government
12 Exhibit 100. Do you see that on your screen?

13 A. I do.

14 Q. Do you recognize this type of record?

15 A. Yes.

16 Q. What is it?

17 A. This is a list view of a set of loans or deals in this
18 case -- is what they're called -- that Womply has for -- in
19 this case for a particular SSN. So there was a search done by
20 an SSN, and this is a list view of the records that correspond
21 to individual deals. So a deal is just a -- it's a connection
22 between an application and a lender.

23 Q. Okay. So this is a record that was from Womply's systems?

24 A. Yes.

25 Q. And you said it was from a search of a Social Security

1 number?

2 A. Yes.

3 Q. The section that I've just enlarged, is that the Social
4 Security number that was searched?

5 A. Yes.

6 Q. What is the Social Security number, for the record?

7 A. 592-09-0026.

8 Q. Okay. And as a result of that search, is this what came
9 back?

10 A. Yes. There were two -- two results.

11 Q. Okay. Let's walk through them. It appears that there's a
12 first name and last name for the result?

13 A. Yeah.

14 Q. What's that?

15 A. The name on the screen is Carolyn Wade.

16 Q. Okay. It appears there was an email address that came
17 back from that search; is that right?

18 A. Yes.

19 Q. And what's the email address?

20 A. The email address on the screen is ckidd1226@gmail.com.

21 Q. How would Womply have gotten that email address, if you
22 know?

23 A. This came from the user.

24 Q. Did the search come back with a phone number?

25 A. Yes.

1 Q. What's the phone number?

2 A. (954) 274-6800.

3 Q. And moving from left to right here, I see SSN and DOB. Do
4 you see that?

5 A. Yes.

6 Q. Is that the SSN -- the Social Security number that was
7 searched?

8 A. Yes.

9 Q. And what was the date of birth that came back?

10 A. It is March 7, 1975.

11 Q. Now, I'm enlarging a section that's called application ID.
12 Do you see that?

13 A. Yes.

14 Q. What's application ID?

15 A. It is an internal identifier for the data that the user
16 provided to us.

17 Q. Is the application ID -- I see two on the screen. Are
18 they identical?

19 A. Yes.

20 Q. What does that mean?

21 A. This means that these two deals point to the same
22 underlying application. Once again, a deal is simply just a
23 way to link an application to a lender.

24 Q. The next section I've enlarged is application status. Do
25 you see that?

1 A. Yes.

2 Q. What does it say?

3 A. Approved.

4 Q. What does that mean?

5 A. This means that Womply was able to verify and validate the
6 information that was provided and was able to send it to a
7 lender.

8 Q. Okay. The next section says deal ID. Do you see that?

9 A. Yes.

10 Q. Are those the two deal IDs you were testifying about a
11 moment ago?

12 A. Yes. These are the identifiers within -- within the
13 system to -- that link an application to a lender.

14 Q. Does the user create the deal ID --

15 A. No.

16 Q. -- or is that something that Womply assigns?

17 A. Womply doesn't assign them either. These come from
18 another system known as Teslar.

19 Q. Okay.

20 A. It's spelled T-E-S-L-A-R.

21 Q. Thank you for that.

22 Now, there's a section with the deal ID -- the deal
23 stage name --

24 A. Yeah.

25 Q. -- the draw number and the lender name. Do you see that?

1 A. Yes.

2 Q. Do you see the section where it says "funded"?

3 A. Yes.

4 Q. And what's the lender name for that?

5 A. Lendistry.

6 Q. And where it says "declined"?

7 A. Harvest.

8 Q. Do you have an understanding of what this data is showing?

9 A. Yes.

10 Q. What does it mean here?

11 A. So this would imply that originally the deal was -- so
12 initially the application was sent to Harvest. Harvest for
13 whatever reason -- it's unclear -- declined the application.
14 And then later, this application was sent to Lendistry, and
15 Lendistry was able to fund the application.

16 Q. So is this one of these instances where an SBA Form 2483
17 would had to have been signed twice?

18 A. Yes.

19 Q. And then the last section of this record shows the SBA
20 loan number. Do you see that?

21 A. Yes.

22 Q. Can you read it for the record?

23 A. The SBA loan number is 6697269001.

24 Q. And that is associated with the deal that was funded?

25 A. Yes. Correct. That is associated with the Lendistry

1 deal.

2 Q. And then the last box is some time stamps created. Do you
3 know what that is?

4 A. Yes. So these are when Womply -- these are when Womply
5 created these deals within our system. So this is when did we
6 supply this information to Teslar.

7 Q. Okay. And what exactly is Teslar, just so the jury can
8 follow along?

9 A. Yes. So Womply was using Teslar to help package all of
10 the data, and then Teslar also communicated with the SBA to
11 submit data to the SBA on behalf of the lenders. So it was an
12 intermediary between us and the SBA and the lenders.

13 Q. All right. We're moving on to Government Exhibit 101 in
14 evidence that I published. Do you see Government Exhibit 101
15 on your screen?

16 A. Yes.

17 Q. Do you recognize this type of record?

18 A. Yes.

19 Q. Is this a Womply record?

20 A. It is a view of a Womply record, yes.

21 Q. Okay. Are you familiar with the type of information
22 that's in here?

23 A. Yes. I designed it.

24 Q. Okay. You designed the system that captured it?

25 A. Yeah. I also designed this page, but that's...

1 Q. Just tell us what we are looking at in this section I've
2 enlarged here.

3 A. Yes. So this is a summarized view for a specific
4 application. It shows when the application was created, what
5 the application ID is, what the -- what -- the user data that
6 was provided in this case, the first name, last name, date of
7 birth, phone, business name and business address. It also
8 provides some links to internal tools that we have to review
9 applications at the top.

10 Q. Okay. And this loan was for who, according to this
11 record?

12 A. Carolyn Wade was the individual.

13 Q. And the information here, is this -- as far as date of
14 birth, phone number, business name, address, is that --
15 well --

16 A. Those portions are provided by the user.

17 Q. Okay. And some of that was in the record we just saw in
18 Government 100?

19 A. Yes. Correct. This is a detailed view of the
20 application.

21 Q. So this is providing more information about the
22 application?

23 A. Yeah.

24 Q. Is this all information that had been inputted into
25 Womply's portal?

1 A. No, there's additional information. This is a summary
2 view of the -- of what was provided into the portal.

3 Q. Okay. I'm now moving to page 2 of Government 101. I'm
4 going to enlarge the first two boxes.

5 A. Okay.

6 Q. Do you recognize the information that's in these boxes?

7 A. Yes.

8 Q. Can you describe it for the jury?

9 A. Yes.

10 Q. You don't have to read it but just describe it, what this
11 is.

12 A. Yeah. So the first row, which is the Plaid-selected
13 account ID, this is the specific account at the financial
14 institution that was linked by Plaid where the user wants the
15 funds sent. It's an internal identifier.

16 And then the second row is what's -- it's called the
17 funding summary, which is a bit of a relic name, but
18 essentially this column was used to capture when the user
19 agreed to the details within the funding summary section.

20 Q. Okay. Does this capture some of the questions that would
21 have been asked during the application process --

22 A. Yeah, the user would have seen this --

23 Q. Sorry. Let me just finish my question so we don't talk
24 over each other.

25 Does this information capture some of the questions

1 that were asked during the application process on Womply's
2 website?

3 A. This information would be -- I believe the answer to that
4 question is yes. The user would have seen this information on
5 the screen, and then when they clicked the button, we would
6 have saved what they saw.

7 Q. And would have saved their answers?

8 A. Well, yes. In this case the answers were prerequired for
9 them.

10 Q. Okay. Prerequired meaning they were required to provide
11 answers?

12 A. No, I think they were -- I believe the nature of this
13 appears that they are -- you are saying no to this and yes to
14 this.

15 Q. Okay. Let's move on to the next page, which is
16 Bates-stamped 3072, Government 101. I'm going to highlight
17 the top portion here, enlarge it.

18 Do you recognize the information that's displayed on
19 your screen?

20 A. Yes.

21 Q. What is it?

22 A. So this -- so the information is encoded in a computer
23 format known as JSON and it contains two records. So the
24 first record starts at the first curly brace on top, and it
25 summarizes what's known as a deal, as I mentioned before.

1 So for this particular record, it's saying that --
2 it's saying that there is a loan for 20,833 associated with a
3 specific application ID -- the one that we've sort of been
4 going over before starting with 72D. It gives the deal ID and
5 the bank that's associated with it and the -- and the last
6 four digits of the account and routing number where the user
7 wants the funds to go.

8 Q. So is this how Womply stored the information related to
9 that deal?

10 A. Yes, correct. This is an internal representation.

11 Q. Internal representation, okay.

12 And then we showed that exhibit that had two deals --
13 I think that was 101.

14 A. Yeah.

15 Q. The information I've highlighted here, is this the
16 information from that other deal?

17 A. Correct. Yes.

18 You'll notice that the application and the amounts
19 are all the same. The primary difference here is that it's
20 for a different lender and it's also in a different state.

21 Q. Do you see the part that I'm highlighting here?

22 A. Yeah.

23 Q. What does it say?

24 A. It says, "DocuSign voided. Successfully move to decline."

25 Q. And is that consistent with having to therefore sign a

1 DocuSign a second time?

2 A. Yeah, that's correct. Because the original DocuSign would
3 have to be voided in order for the second one to be created.

4 Q. Okay. I'm going to move to the page that's
5 Bates-stamped 3074. On the left column it says, "Plaid
6 items" -- well, let's start with the first group. Can you
7 read that?

8 A. Yes.

9 Q. What information is displayed here?

10 A. So this is showing that the user linked a set of bank
11 accounts -- or I should say the user provided credentials for
12 a set of bank accounts at the financial institution USAA.
13 They provided it from the IP address ending in 184. It was
14 provided on May 13th, 2021, at 2:51 PM UTC. And, yeah, that's
15 also the relevant information there.

16 Q. Was there an IP address that was captured in connection
17 with this information being supplied to Womply?

18 A. Yes, ending in 184.

19 Q. I'm now enlarging the second group of information. Do you
20 see that?

21 A. Yes.

22 Q. Without reading each and every line, just generally what
23 is being displayed here?

24 A. This appears to be the user attempting to link the same
25 financial institution with the same credentials at a later

1 point -- or actually in this case at an earlier point in time.

2 Q. Is this a different transaction than the one we just
3 looked at?

4 A. Yes.

5 Q. Was there an IP address captured in connection with this
6 transaction?

7 A. Yes. That's correct. It's the same IP address as before.

8 Q. And it ends in what?

9 A. 184.

10 Q. I've now enlarged the third section of information. What
11 is this?

12 A. This is another -- this is another attempt to -- well,
13 this is another successful attempt to link a financial
14 account, and this was just prior to the previous two -- maybe
15 a minute or so earlier than the previous two, but it's the
16 same financial institution, and it represents the same set of
17 bank accounts.

18 Q. Okay. And just so everybody can follow along here. Do
19 you see the section that I've highlighted?

20 A. Yes.

21 Q. Does that reflect the IP address that was captured?

22 A. Yes.

23 Q. And it ends in?

24 A. 184.

25 Q. All right. Now I'm moving to the last section of data.

1 Do you see that?

2 A. Yes.

3 Q. What does this reflect?

4 A. This is the same bank account again except this was --
5 instead of being on the 13th, I believe, of May, this was on
6 the 4th of May.

7 Q. So we're going back in time?

8 A. Correct, this is going back in time.

9 Q. And was an IP address captured for this transaction?

10 A. Yes. Ending in 166.

11 Q. So different than the first three that we just --

12 A. Correct. Yeah. And I suppose it's because the first
13 three that we talked about were all kind of in succession at
14 around the same time.

15 MR. WILCOX: I object to the speculation, Judge. I
16 would ask that the last answer be stricken.

17 THE COURT: One moment. Well, the term suppose was
18 used. Why don't you verify whether it's speculation or if he
19 knows from his own personal evaluation.

20 BY MR. SNIDER:

21 Q. Okay. I don't remember what my question was, but I think
22 it was -- well --

23 THE COURT: So different than the first three we
24 just --

25 BY MR. SNIDER:

1 Q. That's all I was asking. Those different IP addresses --

2 A. That's correct. Yes. There were two unique IP addresses.

3 Q. Okay. Publishing for you Government Exhibit 103 in
4 evidence and 104. I'm going to do this side by side.

5 Okay. Mr. Thakral, I've published two exhibits side
6 by side.

7 A. Yes.

8 Q. Do you see Government Exhibit 103 on the left-hand side of
9 your screen?

10 A. Yes.

11 Q. Yes. Do you see Government Exhibit 104 on the right side
12 of your screen?

13 A. Yes.

14 Q. Let's talk about -- we'll start with -- can you see --

15 A. Yes.

16 Q. -- these documents? Can you recognize them?

17 A. Yes.

18 Q. What are they -- just let me finish. You may already know
19 the answer --

20 A. Okay.

21 Q. -- because you're just anticipating what I'm asking, but
22 let me finish my question and then you can give the answer.

23 A. I apologize.

24 Q. All right. What are we looking at in 103 and 104?

25 A. So this -- this is a summary of the KYC, also known as

1 know your customer -- it's an industry term -- about the
2 applicant.

3 Q. Okay. And is this information that Womply collected?

4 A. Yes. It is a summary of information that Womply -- of
5 information that Womply collected.

6 Q. Okay. I'm enlarging the information on the left side,
7 which is from Government 103, which is a Bates number ending
8 in 2822.

9 What is the email address that was collected by
10 Womply?

11 A. Ckidd1226@Gmail.com.

12 Q. Does this show that that email was verified?

13 A. Yes.

14 Q. And when was that verified?

15 A. May 4, 2021, at 7:27.

16 Q. Is there a phone number that appears here?

17 A. Yes.

18 Q. What does it end in?

19 A. It ends in 6800.

20 Q. Was that phone number verified?

21 A. Yes.

22 Q. When?

23 A. At the same time.

24 Q. The next line reads, "IP address created application." Do
25 you see that?

1 A. Yes.

2 Q. Do you know what that means?

3 A. Yes. That is the IP address that was used to create the
4 application.

5 Q. And what does that end in?

6 A. 166.

7 Q. Do you see where it says "KBA completed"?

8 A. Yes.

9 Q. Do you see the letter N?

10 A. Yes.

11 Q. What does that mean?

12 A. In this case for this particular application, the user did
13 not go through a KBA, also known as knowledge-based answers,
14 for the DocuSign that they were sent.

15 Q. Okay. Was something else done?

16 A. Yes. Instead, Persona was used here.

17 Q. And that's the verification -- Persona that you testified
18 about a few minutes ago?

19 A. Correct.

20 Q. When was the Persona ID complete, according to this
21 record?

22 A. May 13 at 2:37 PM -- I'm assuming these are UTC, but
23 there's no --

24 Q. Don't assume anything. Do you know the time?

25 A. No. I'm not sure what time zone because it's not stated.

1 Q. Now, I've enlarged a section called deal ID and bank ID.

2 Do you see that?

3 A. Yes.

4 Q. Is that one of the deal IDs that we looked at a moment
5 ago?

6 A. Yes, it appears to be so.

7 Q. And there's a bank ID 2091?

8 A. Yes. That is for Harvest.

9 Q. And then moving to the right side of your screen, this
10 looks like a similar record. Is it?

11 A. Yes, it's -- so these records were generated on a
12 per-lender basis.

13 Q. A per-lender basis?

14 A. Yes.

15 Q. So is this the same information but for a different
16 lender?

17 A. Correct.

18 Q. Is that lender identified by the bank ID?

19 A. Yes.

20 Q. What number is that?

21 A. 2097.

22 Q. Do you know that lender?

23 A. Lendistry.

24 Q. So is this for the deal that was funded?

25 A. Yes.

1 Q. But it's the same information?

2 A. Yes.

3 Q. Publishing for you Government Exhibit 105 in evidence. Do
4 you see Exhibit 105 on your screen?

5 A. Yes.

6 Q. Do you recognize this record?

7 A. Yes.

8 Q. What is it?

9 A. So this is a summary of the bank information collected.

10 Q. Okay. I'm going to highlight the first box. Do you see
11 that?

12 A. Yeah.

13 Q. What does it say and what does it mean?

14 A. So this means that the user provided their USAA
15 credentials at -- sorry -- on May 13th at 2:51 PM.

16 Q. When you say USAA credentials, what does that mean?

17 A. That is the user had to provide via -- through Plaid their
18 username and password for USAA.

19 Q. So for an account to log into USAA bank?

20 A. Well, they may have also had to provide a one-time code,
21 if that was part of the login process for USAA.

22 Q. And you say this was done through Plaid, but was Plaid
23 software embedded in Womply's website?

24 A. Yes.

25 Q. It didn't have to go to a separate website?

1 A. Correct.

2 Q. Now, I'm enlarging the rest of the information that is on
3 Government 105. Do you see that?

4 A. Yes.

5 Q. Do you know what this is?

6 A. Yes. So this appears to be a collection or, rather, a
7 summary of the accounts that the user had at USAA. In this
8 case, there appears to be five accounts that are shown here.
9 All of the -- all of the account names end with an asterisk
10 and four digits. Those represent the last four digits of the
11 account number for that specific account.

12 The other information is the name of the account.
13 For example, it's whether it's a classic checking or in some
14 cases if the user changed the name of the account, one of the
15 accounts would be called Carolyn's account, as shown here.

16 There are -- Womply also summarized -- summarized by
17 account the number of transactions that occurred in January
18 and February of 2020 on that -- on the account shown.

19 Q. How would Womply through Plaid have gotten this
20 information? How would it --

21 A. It was sent to us by Plaid.

22 Q. And how would Plaid have gotten it?

23 A. Plaid connects with the financial institution to acquire
24 this information.

25 Q. Is that done through the credential that the user

1 provides?

2 A. Yes.

3 Q. So if there were multiple credentials for each one of
4 these accounts, each credential would have had to have been
5 provided?

6 A. Well, no. So the credentials are provided at a -- it's
7 almost like a user basis, not an account basis. So one set of
8 credentials gives you access to multiple accounts at the
9 financial institution. And depending on the permissions
10 within the financial institution, that's what we would get
11 back --

12 Q. Okay.

13 A. -- for those credentials.

14 Q. Now I'm publishing Government Exhibit 106 in evidence. Do
15 you recognize this record?

16 A. Yes.

17 Q. What are we looking at here?

18 A. This is a summary of bank statements that were uploaded by
19 the user.

20 Q. Okay. Is there more than one bank statement that appears
21 to be uploaded?

22 A. Based off of this, I see two: One that was uploaded on
23 May 4th and another one that was uploaded on May 13th.

24 Q. And is this for the same deal ID and deal that we've been
25 discussing today?

1 A. Yes, this is for Lendistry.

2 Q. I'm publishing Government Exhibit 107. Do you see 107 on
3 your screen?

4 A. Yes.

5 Q. What is this record?

6 A. This is a summary of what are called the funding
7 instructions; that is, this is where the user would like the
8 funds to go. In this case, this account and routing number
9 was verified via the instant method. So as I mentioned before
10 earlier in my testimony, the user could provide it either via
11 Plaid, which was the instant method, or by manual upload,
12 which was the manual method. In this case, the user provided
13 via Plaid that they want the funds to be sent to a USAA
14 account ending in 3926.

15 Q. The routing number is supplied?

16 A. Yes, the routing number is provided.

17 Q. And the SBA loan number is there?

18 A. Yes, as well as the user's name and address.

19 Q. And what is the name?

20 A. Carolyn Wade.

21 Q. And that email and phone number, is that the same email
22 and phone number that we had previously looked at?

23 A. Yes.

24 Q. Is those funding instructions where Womply is to send the
25 money for the PPP loan?

1 A. Yes.

2 Q. I'm publishing Government Exhibit 108 in evidence --

3 A. Sorry. Just to clarify. Womply was not sending the
4 funds. That's where the lenders would send the funds, not
5 Womply.

6 Q. Correct.

7 That was the information that Womply received in
8 order for the lender to know where to send the money?

9 A. Correct.

10 Q. I've published Government 108. Do you see that?

11 A. Yes.

12 Q. What is this document called?

13 A. This is a summary of the supporting tax documents that
14 were provided by the user.

15 Q. So this is information that was entered into Womply's
16 website?

17 A. Yes. Either uploaded -- well, a combination of uploaded
18 and entered.

19 Q. Okay. Let's walk through this. So the first box, what
20 are we looking at here?

21 A. So this summarizes the documents that were received by
22 Womply. And this table shows that there was one Schedule C
23 from tax year 2019 that was submitted.

24 Q. Okay. Anything else that was submitted as far as tax
25 documents --

1 A. No --

2 Q. -- from this record? Just let me finish.

3 According to this record, any other tax documents
4 that were submitted in connection with this application?

5 A. No.

6 Q. Let's look at the next box.

7 What is this box -- what's this section here titled?

8 A. So the -- this is titled User-Entered Gross Income Detail,
9 and it represents what the user typed in as their gross income
10 detail into the website. And this was part of our validation
11 process.

12 Q. And what number was typed in by the user, according to
13 this record?

14 A. It was an amount of 96,882.

15 Q. And from what type of tax document does it appear that
16 number was, at least according to the record, being
17 represented to have been coming from?

18 A. This was from a 2019 Schedule C.

19 Q. Let's look at the next section of Government 108. What is
20 this section titled?

21 A. So this is titled OCR Gross Income Detail.

22 Q. What does OCR mean, if you know?

23 A. So OCR stands for optical character recognition. And in
24 the context of this particular table, what it represents is
25 that we extracted this information via -- via OCR or optical

1 character recognition from the document that was uploaded.

2 Q. Does this record -- that was my next question. Does this
3 record indicate that a Schedule C was uploaded?

4 A. Yes.

5 Q. Can you tell by looking at this the type of file that was
6 uploaded?

7 A. Yes. It was a PDF file.

8 Q. Do you see where it says "value"?

9 A. Yes.

10 Q. What is that number?

11 A. It's -- 113,560.

12 Q. And that information was read from --

13 A. Yes, it was read by a computer.

14 Q. Is it fair to say the computer basically is, like,
15 scanning the document?

16 A. Yes.

17 Q. Reading it like a computer?

18 A. Yeah.

19 Q. Now, I've enlarged the third section of Government 108.
20 Do you see that?

21 A. Yes.

22 Q. What's this section titled?

23 A. Updated Gross Income Detail.

24 Q. Do you understand what that means?

25 A. Yes.

1 Q. What does that mean?

2 A. In this context, it means that the information that will
3 be submitted for the application would be the amount of
4 113,560.

5 Q. Okay. Which appears different than what the user-entered
6 number was; is that right?

7 A. Yes.

8 Q. Do you have an understanding of how this was updated?

9 A. Yes.

10 Q. Can you explain that?

11 A. Yeah. So Womply had an error-detection process that
12 happened on the OCR documents. And so in this case, what had
13 to have happened is the system would have found a different
14 number -- in this case 96,882 on the document itself --
15 probably on a different line of the Schedule C and recognized
16 that the user just made a clerical error in the line number
17 that they were entering and then recognized that the actual
18 line number that they wanted -- that was on the document was
19 113,560.

20 Q. Okay. So that would have been an automatic correction?

21 A. Yes.

22 Q. Would that only have happened if the other number from a
23 different line had been entered?

24 A. To my understanding, yes.

25 Q. I'm publishing Government 113 in evidence. Can you see

1 Government 113 on your screen?

2 A. Yes.

3 Q. Do you recognize it?

4 A. Yes.

5 Q. What type of document is this?

6 A. This is a Schedule C as part of a 1040 form for the tax
7 year 2019.

8 Q. Is this one of the documents that was required to be
9 transmitted to Womply in connection with the Paycheck
10 Protection Program application?

11 A. Yes. It was a required document.

12 Q. I've enlarged the first section of this. Can you read
13 this Schedule C? Who is this for?

14 A. So this is -- in this case the name of the proprietor is
15 Carolyn Wade and the name of the business is also Carolyn
16 Wade.

17 Q. The record we looked at a moment ago, which was Government
18 Exhibit 108, was 108 a record of Womply having received this
19 tax document for Carolyn Wade?

20 A. I don't remember what the -- what the number was that we
21 were looking at before. I believe it was 108. Are you
22 referring to the summary of the supporting tax documents?
23 Yes, 108.

24 Q. Now I've published 108 and 113 side by side. So does
25 Womply have a record of having received this Schedule C --

1 A. Yes.

2 Q. -- for the sole proprietor Carolyn Wade?

3 A. Yes.

4 Q. I've put 113 by itself back onto the screen. I'm going to
5 enlarge the section that says part one. Do you see that?

6 A. Yeah.

7 Q. What is the amount in line 7?

8 A. The amount in line 7 is 113,560.

9 Q. And is that the line for which the tax information was
10 required --

11 A. Yes.

12 Q. -- to be entered?

13 And let's look at part two. Do you see part two
14 enlarged?

15 A. Yes.

16 Q. What is in line 29?

17 A. That is the tentative profit or loss. It is 96,882.

18 Q. And just by memory, did you see that on the previous
19 Document 108?

20 A. Yes. That was under the user-entered gross income
21 details, I believe, was the name of the section.

22 Q. Okay. I've published Government Exhibit 114.

23 Do you recognize this type of document?

24 A. Yes.

25 Q. We're not going to go through this one, but just tell the

1 jury generally what this is.

2 A. So this was a document that was received by Womply from
3 Persona, and it summarizes a specific inquiry that is an
4 attempt for the user to verify their identity. It is known as
5 an inquiry.

6 Q. And this was the inquiry for who?

7 A. This was for Carolyn Wade.

8 Q. Are you familiar with this record?

9 A. Yes.

10 Q. Does this have information related to the identity
11 verification for Carolyn Wade?

12 A. Yes. It shows the user's driver's license.

13 Q. So would Womply have access to this record?

14 A. Yes.

15 Q. Now I've published 115. Do you see that?

16 A. Yes.

17 Q. Do you recognize 115?

18 A. Yes, it appears to be another document from Persona.

19 Q. Okay. And it also includes a record from the identity
20 verification for Carolyn Wade?

21 A. Yes.

22 Q. Let's take a look at Government 116. Do you see 116 on
23 your screen?

24 A. Yes.

25 Q. Do you recognize it?

1 A. Yes.

2 Q. Okay. What is Government 116?

3 A. This is an SBA Form 2483-C.

4 Q. And what type of form is that?

5 A. Oh. It is a -- it is an application for Schedule C filers
6 as part of the Paycheck Protection Program.

7 Q. Is this the form that would have been populated with the
8 information that was supplied through Womply's website?

9 A. Yes.

10 Q. Did Womply keep a copy of this application?

11 A. I don't recall if we have a copy of this or not. I
12 believe it's in Teslar. I'm not sure if we have a direct copy
13 of it.

14 Q. Womply has access to Teslar?

15 A. Yes.

16 Q. Now let's start at the top here. Do you see the section
17 that I've enlarged that says DocuSign --

18 A. Yes.

19 Q. -- envelope ID?

20 A. Yes.

21 Q. What is that, if you know?

22 A. That is a unique identifier for a collection of documents.
23 So it's an envelope of documents within the DocuSign system.

24 Q. Who is this application, according to this record, on
25 behalf of?

1 A. This application is on behalf of Carolyn Wade.

2 Q. What is the gross income information that was taken from
3 line 7 of the Schedule C?

4 A. 113,560.

5 Q. What was the tax year that was used?

6 A. 2019.

7 Q. And the phone number ends in what?

8 A. 6800.

9 Q. And the email address is?

10 A. I don't -- oh, there it is. It is ckidd1226@gmail.com.

11 Q. Who is the primary contact?

12 A. Carolyn Wade.

13 Q. We're moving to page 2 of Government 116. Do you see
14 page 2?

15 A. Yes.

16 Q. I'm going to enlarge the section that says "questions."
17 Do you see that?

18 A. Yes.

19 Q. Are you familiar with the information that's here?

20 A. Generally, yes.

21 Q. Do you see line 5?

22 A. Yes.

23 Q. What do you see on line 5?

24 A. So I see -- I see a set of initials or signature -- I'm
25 assuming probably initials is my guess, based on what I've

1 seen here.

2 Q. What are the initials that you see?

3 A. CW.

4 Q. Okay. Do you see that in line 6?

5 A. Yes.

6 Q. Do you have an understanding of how those got onto this
7 application?

8 A. These you would have had to have clicked on the screen to
9 say set my initials in this part of the form.

10 Q. Through what process?

11 A. Through the DocuSign signing process.

12 Q. We're now on page 3 of Government 116.

13 Do you see the section that I've enlarged?

14 A. Yes.

15 Q. Can you read this first line? What does it say?

16 A. So it says, "I certify" --

17 MR. WILCOX: Your Honor, objection. Cumulative.

18 THE COURT: Overruled.

19 BY MR. SNIDER:

20 Q. Go ahead. Read what I've highlighted, please.

21 A. Okay. What you have highlighted here is, "By signing
22 below, you make the following representations, authorizations,
23 and certifications: I certify that I have read the statements
24 included in this form, including the statements required by
25 law and executive orders, and I understand them."

1 Q. Based on your understanding of how the DocuSign process
2 works and the testing that Womply did, would this have been
3 visible during the DocuSign signing event?

4 A. Yes, that is my understanding.

5 Q. Let's move through -- do you see the section of
6 Government 116 --

7 A. Yes.

8 Q. -- on page 2863 that I've enlarged?

9 A. I do.

10 Q. What do you see on the left side of your screen?

11 A. There appears to be a column of initials that -- it looks
12 like the same -- the same initials, CW, down the page.

13 Q. Okay. And do you have an understanding of how those got
14 on there?

15 A. My understanding is that the user would have had to have
16 clicked each one of those sections to initial.

17 Q. And in so doing was this information to the right of the
18 initials visible?

19 A. Yes. That is my understanding.

20 Q. Can you read the section that I've highlighted?

21 A. Yes. The section that you have highlighted is "I further
22 certify that the information provided in this application and
23 the information provided in all supporting documents and forms
24 is true and accurate in all material respects.

25 "I understand that knowingly making a false statement

1 to obtain a guaranteed loan from SBA is punishable under the
2 law, including under 18 USC 1001 and 3571 by imprisonment of
3 not more than five years and/or a fine of up to \$250,000,
4 under 15 USC 645 by imprisonment of not more than two years
5 and/or a fine of not more than \$5,000 and, if submitted to a
6 federally insured institution, under 18 USC 1014 by
7 imprisonment of not more than 30 years and/or a fine of not
8 more than \$1 million."

9 Q. Okay. Thank you.

10 Moving on to the next page of Government 116. Do you
11 see the section on this page --

12 A. Yes.

13 Q. -- which is Bates-stamped 2869 that I've enlarged?

14 A. Yes.

15 Q. What is in the section that I've enlarged?

16 A. This appears to be a signature and a date.

17 Q. What is the print name?

18 A. Carolyn Wade.

19 Q. What is the date?

20 A. May 18, 2021.

21 Q. And according to this application, the title --

22 A. Owner.

23 Q. We're now on page 9 of Government 116. Do you see page 9?

24 A. Yes.

25 Q. Are you familiar with this page?

1 A. Yes.

2 Q. What is this kind of page?

3 A. So this page is generated by DocuSign. It's known as a
4 certificate of completion. It summarizes the various events
5 that were involved in the execution process of the document.

6 Q. Okay. Let's look at the first section. Do you see that?

7 A. Yes.

8 Q. Does it indicate here how many signatures were DocuSigned?

9 A. Yes. There is a table that says that there was one
10 signature and 12 initials.

11 Q. Okay. And is that the section here that I've highlighted?

12 A. Yes.

13 Q. And who was this envelope -- where did it originate?

14 A. So the originator, as stated on this certificate of
15 completion, is Womply PPP admin.

16 Q. Now let's look at the section called signer events.

17 A. Okay.

18 Q. Do you see that?

19 A. Yes.

20 Q. Let's start on the left side, signer events. According to
21 the record, who was the signer?

22 A. Carolyn Wade.

23 Q. What was the email address for the signer?

24 A. Ckidd1226@gmail.com.

25 Q. Is that the email address that would have been used to --

1 A. Yes, that is the email address that would have -- where
2 the document link would have gone.

3 Q. Okay. Do you see the section where it says "signature
4 adoption drawn on device"?

5 A. Yes.

6 Q. Do you know what that means?

7 A. Yes. The user would have used their finger to draw the
8 signature as part of the document-signing process.

9 Q. Do you see the section that I've highlighted where it says
10 "using IP address"?

11 A. Yes.

12 Q. Do you understand what that means?

13 A. Yes. That is the IP address that was visiting the
14 DocuSign website.

15 Q. Do you see where it says "signed using mobile" where I've
16 highlighted?

17 A. Yes.

18 Q. Do you understand what that means?

19 A. Yes. This is indicating that the DocuSign was signed
20 using a mobile device.

21 Q. Do you see the section where it says "time stamp"?

22 A. Yes.

23 Q. Do you understand the information that's in this section?

24 A. Yes. This is a history of the events associated with that
25 particular signing process.

1 Q. Do you know what sent means?

2 A. That's when the email was sent to the user about the
3 document.

4 Q. Do you know what viewed means?

5 A. That is when the user viewed the document.

6 Q. Okay. And do you know what signed means?

7 A. I believe in this case it means when the user completed
8 the signing process.

9 Q. And what date did this sending, viewing, and signing
10 occur?

11 A. These -- all three events occurred on May 18, 2021.

12 Q. The time that it was viewed appears to be what?

13 A. 7:54 AM.

14 Q. And the signing completion appears to be at what time?

15 A. 7:56 AM.

16 Q. I'm going to put Government 116 on the left side of your
17 screen, and I'm going to put on the right side Government 117.
18 Do you see 116 and 117 side by side?

19 A. Yes.

20 Q. We just went through Government Exhibit 116. Looking at
21 these two documents side by side, do they appear to contain
22 the same information on the first page?

23 A. Let me just take a look here. Based on a quick visual
24 inspection, they appear to be the same.

25 Q. Okay. Let's highlight -- does the information in the

1 application appear to be the same?

2 A. Yes, the information within the application appears to be
3 the same, correct.

4 Q. This DocuSign envelope ID that I just enlarged is from
5 116. What does it end in?

6 A. The BF27.

7 Q. And this one on the right ends in what?

8 A. 6F00.

9 Q. Okay. Does that appear to you to be a different
10 DocuSigning event?

11 A. Yes, these appear to be different -- different envelopes
12 within the DocuSign system.

13 Q. Okay. I'm now doing side by side page 2, which for
14 Government 116 is Bates numbered 2862 and for Government
15 Exhibit 117 is 2951. Do you see both of those on your screen?

16 A. Yes.

17 Q. Do these appear to be identical other than the DocuSign
18 envelope ID?

19 A. Yes. By visual -- by a quick visual inspection, they
20 appear to be the same.

21 Q. Okay. We talked about how if a second lender was needed
22 in order fund the loan that the DocuSigning process had to be
23 done again. Do you remember that?

24 A. Yes.

25 Q. Did the information have to be entered a second time or

1 was it the same information that was basically being put into
2 the same application?

3 A. No. We would just generate a new document. The
4 information would be exactly the same because the underlying
5 application is exactly the same.

6 Q. I'm now putting page 3 side by side. The left side is
7 page 2863, Bates-stamped, right side is 2952, Bates-stamped.
8 Do these appear to be the same?

9 A. Start with -- what's the question? Is the question that
10 the pages are the same?

11 Q. The information, does it appear to be -- they look the
12 same to you?

13 A. Yeah. Upon a quick visual inspection, they look to be the
14 same.

15 Q. Okay. Now on page 4 of both exhibits, that's page 2864 of
16 Government 116 and page 2953 of Government 117. Do you see
17 those side by side?

18 A. Yes.

19 Q. The date for the one on the left is what?

20 A. May 18th, 2021.

21 Q. And the date for the one on the right is what?

22 A. May 28, 2021.

23 Q. Okay. And the signer for the one -- this is the one on
24 the right -- is who?

25 A. Carolyn Wade is the print name.

1 Q. And the one on the left?

2 A. The print name is Carolyn Wade.

3 Q. I've gone to page 9 on the left side of 116 and I'm going
4 to page 20 on the right side. Do you see that?

5 A. Yeah.

6 Q. Okay. Let's focus on the one on the right. I'm going to
7 enlarge it. Do you recognize this page from Government 117?

8 A. Yes. This appears to be a certificate of completion
9 for -- for a different envelope than the first one.

10 Q. Okay. And who's the signer -- let's look at the signer
11 events for this one. Who is the signer?

12 A. Based on this document, it's Carolyn Wade.

13 Q. And what was the email address to which this document was
14 signed for DocuSigning?

15 A. Ckidd1226@gmail.com.

16 Q. Do you see where it says "signature adoption"?

17 A. Yes.

18 Q. According to this, how was this one signed?

19 A. So the signature adoption was done by a drawn-on device;
20 that is, the user drew the initials or the signature on their
21 device.

22 Q. Okay. And what was the IP address used for this signing
23 event?

24 A. The IP address -- do you want the full address or just the
25 ending in?

1 Q. Well, for the record, what's the full one?

2 A. The full IP address is 107.131.161.84.

3 Q. And let's look at the time stamps for this signing event.

4 When was this DocuSign email sent?

5 A. So the email was sent on May 28 at 11:26 AM.

6 Q. And when was this DocuSign viewed?

7 A. It was viewed on the same day at 2:15 PM.

8 Q. And when was the signing completed, according to this
9 record?

10 A. It was completed on the same -- within 40 -- sorry. It's
11 2:15 PM, but it appears to be 43 seconds later.

12 Q. Okay. Mr. Thakral, how did Womply communicate with its
13 customers?

14 A. We -- I'd say -- so we offered chat, email, and SMS
15 messages. It depends on each case, but, yeah, those were the
16 three main mechanisms to communicate with our customers.

17 Q. Did Womply send emails out to customers?

18 A. Yes.

19 Q. Did it send email addresses out to the email address that
20 Womply had on record for its customer?

21 A. Sorry. Could you please repeat the question?

22 Q. Sure.

23 Did Womply send emails to the email address it had on
24 record for its customers?

25 A. Yes.

1 Q. I'm publishing Government Exhibit 120 in evidence. Do you
2 see that? I've put it on the left side of the screen.

3 A. Yes.

4 Q. Do you recognize the information that's in 120?

5 A. Yes.

6 Q. I didn't mean to highlight it. Sorry.

7 Can you describe what we're seeing here in
8 Government 120?

9 A. So this appears to be a table of events that happened with
10 regards to various emails that were sent out. In the first
11 column it is the email address that it was sent to. It's the
12 email underscore ADDR column. In the next column it is the
13 workspace. In this case it was Fastlane 2021. Both the email
14 and workspace is the same for all of these events shown here.

15 There is a newsletter ID which -- which I believe is
16 a reference to a specific template that was used for the
17 email, and then there is a campaign send date. In this case
18 it corresponds to when was the email sent in UTC time or Zulu
19 time.

20 Q. So this is a record or a log of emails that Womply sent to
21 the address ckidd1226@gmail.com?

22 A. Yes, it's a log. That is a great description.

23 Q. A newsletter ID refers to what?

24 A. Oh, my understanding is the newsletter ID refers to a
25 specific email template that was used.

1 Q. I'm going to keep the log up on the left side of your
2 screen. That's Government Exhibit 120. I'm going to publish
3 some exhibits on the right side of your screen starting with
4 121 in evidence -- Government 121. Do you see both side by
5 side?

6 A. Yes.

7 Q. Now, at the top of Government 121 on the right side of
8 your screen, do you see where it says "newsletter ID"?

9 A. Yes.

10 Q. And what's that?

11 A. 1122.

12 Q. Okay. Does that correspond with the newsletter ID in the
13 log?

14 A. Yes. It's the first row.

15 Q. Okay. So according to this, when was this email sent to
16 ckidd1226@gmail.com?

17 A. May 13 at 10:23 AM UTC.

18 Q. I'm not sure if we've used that term before. What is UTC?

19 A. It's the universal time coordinate. It is the standard
20 time zone.

21 Q. Is that different than East Coast time?

22 A. Yes.

23 Q. Okay. So do you recognize the email that is in
24 Government 121 newsletter ID 122?

25 A. I don't recognize the email specifically, but I've seen

1 similar emails before.

2 Q. Okay. This is a similar email or template that Womply has
3 sent before?

4 A. Yes. Yeah.

5 Q. And what is being communicated in this email?

6 A. So -- just give me a moment here.

7 So this appears to be a set of instructions to allow
8 the user to continue an existing application that they have in
9 progress.

10 Q. Okay. And what does it say here in the first paragraph?

11 A. Would you like me to read the --

12 Q. Yeah, you can read it. I'll highlight it. Go ahead and
13 read that.

14 A. The highlighted text reads as "Your Paycheck Protection
15 Program application is currently incomplete. It looks like
16 you may have gotten stuck on one of the application sections
17 needed to complete your PPP loan. We see this happen when:"

18 Q. Okay. And then there's some reasons why it may have
19 gotten...

20 Womply's application, did it have to be completed all
21 at once?

22 A. No.

23 Q. It could have been completed at different steps?

24 A. Yes. You can complete the application incrementally.

25 Q. Let's take a look at Government 122, which I'm going to

1 publish on the right side. Do you see 122 on the right side?

2 A. Yes.

3 Q. What's the newsletter for this one?

4 A. The newsletter ID or the --

5 Q. The ID.

6 A. The newsletter ID is 1214.

7 Q. Do you see newsletter ID 1214 on the log?

8 A. Yes. Correct. It's in the second row.

9 Q. Okay. And when, according to the log, was this one sent
10 to ckidd1226@gmail.com?

11 A. May 19th, 2021, UCC -- sorry. 5:08 AM UTC.

12 Q. All right. Have you seen an email like this before?

13 A. Yes.

14 Q. In Government 122?

15 A. Yes.

16 Q. What is it communicating?

17 A. It is communicating that -- that Womply is still
18 processing applications. It looks like this is in reference
19 to a -- an SBA change that happened partway through the PPP
20 program.

21 Q. Are you familiar with that change?

22 A. Yes.

23 Q. Okay. What is it that Womply's explaining here?

24 A. So I believe sometime in May, if I recall correctly, the
25 SBA no longer -- or limited loans to those who were part of

1 CDFIs, which are also known as community development financial
2 institutions. And so the goal was to prioritize funding those
3 loans that were part of lenders that are associated with
4 community banks.

5 Q. Okay. So --

6 A. So it was like a different bucket of funding.

7 Q. And what does it say here in the second paragraph?

8 A. It says here that there is internal status changes on
9 applications as a result of some of the work that we're doing
10 in regards to point one and that we apologize for the
11 confusion that it may be causing.

12 Q. Okay. Do you know whether Lendistry was one of these
13 CCDIs?

14 A. A CDFI.

15 Q. A CDFI?

16 A. I believe so, if I recall.

17 Q. Is this consistent with what you've said earlier about how
18 it would change between different lenders?

19 A. Yes -- do you mean with regards to the cancellation of one
20 and the funding of another?

21 Q. Yes.

22 A. Okay. Yes.

23 Q. Is that consistent with --

24 A. Yes.

25 Q. Let's take a look at Government 123 on the right side.

1 Do you see Government 123?

2 A. Yes.

3 Q. What is the newsletter for this one?

4 A. The newsletter ID is 1216.

5 Q. Do you see 1216 in Government 120, the log?

6 A. It's the third row.

7 Q. Okay. So according to the log, when was this one sent to
8 ckidd1226@gmail.com?

9 A. May 19th, 2021, at 6:38 AM UTC.

10 Q. And the email in Government 123 to ckidd1226, what is this
11 communicating?

12 A. Give me a moment here to read it.

13 So this is communicating that the user has not signed
14 the document yet, and it's encouraging them to sign the
15 document.

16 Q. Okay. Did Womply send reminders like this if a DocuSign
17 had not yet been signed?

18 A. Yes.

19 Q. Let's look at 124 on the right side. Do you see that?

20 A. Yes.

21 Q. Does this appear to be another reminder to DocuSign?

22 A. Yes. This -- the content upon a quick visual inspection
23 appears to be the same as the prior email.

24 Q. And this newsletter is 1217?

25 A. Yes. The newsletter ID is 1217, in the fourth row.

1 Q. This one was also sent to ckidd1226@gmail.com?

2 A. Yes.

3 Q. I'm publishing 125 on the right side of your screen. Do
4 you see that?

5 A. Yes.

6 Q. Does this appear to be another DocuSign reminder?

7 A. Yes, it appears to have the same content as the prior
8 email.

9 Q. And this is 1222?

10 A. Yes.

11 Q. Was 1222 sent to ckidd1226@gmail.com?

12 A. It was sent on May 19th, 2021, at 7:58 PM UTC.

13 Q. Would Womply continue to send these reminders until the
14 DocuSign was completed?

15 A. Yes. That was part of the workflow.

16 Q. We're going to now look at some other exhibits that I'm
17 going to publish for you, and these are in evidence both as an
18 Excel spreadsheet as well as a PDF that I put a sticker on,
19 and we're going to look at the Excel spreadsheet just because
20 I think it's a little easier to see.

21 Does the Court want to continue now or want to take a
22 break? It's up to --

23 THE COURT: So, ladies and gentlemen, we can take a
24 10- to 15-minute break now and have lunch around 1:00, or if
25 you want to go until 12 noon, we can break for lunch at that

1 time. What's your preference?

2 MR. SNIDER: I think I have about 30 minutes left.

3 THE COURT: I'm sorry? Go forward?

4 THE JURY: Go forward.

5 MR. SNIDER: Okay. Very good. I like it.

6 BY MR. SNIDER:

7 Q. Okay. Mr. Thakral, I have published an Excel sheet that's
8 in evidence as Government Exhibit 102E. Do you see that?

9 A. Yes.

10 Q. Do you recognize Government 102E?

11 A. Yes.

12 Q. Can you explain to the jury what this is overall? And
13 we'll get into the details. But generally what are we looking
14 at?

15 A. So this is a record of transactions that occurred as part
16 of the application. In this case a transaction represents
17 either an insert, update, or delete to a record in a table
18 within the Womply database. And this shows the IP address,
19 time stamp, and user ID associated with each transaction as
20 well as it shows the table that was impacted and the type of
21 change that occurred in column F here. So column F operation
22 type, those could either be 0, 1, or 2.

23 A 0 means that a record was inserted into the
24 database, 1 means a record was modified or updated into the
25 database, and 2, which I don't think we actually have in this

1 spreadsheet, would mean that a record was deleted from the
2 database.

3 Q. When you say we don't have it, you don't see any instances
4 of a record being deleted?

5 A. Correct. Yeah.

6 Q. Now, you said this is updates to a table?

7 A. Yes.

8 Q. Explain what you mean by that.

9 A. So within our database, different pieces of information
10 are stored in different logical groups or tables, and the
11 tables consist of various columns. For example, one table
12 that we have -- that we refer to as the application table
13 would contain the first name, the last name, the date of
14 birth, so on and so forth.

15 We have a separate table for bank data. We have a
16 separate table for any of our Persona data. So it's a logical
17 grouping of different kinds of data within our database. So
18 one database is composed of multiple tables.

19 Q. Okay. Now, let's look at the first column here where it
20 says "transaction ID." Do you see that?

21 A. Yes.

22 Q. What is that indicating?

23 A. That is a -- that is an identifier that is serial -- it
24 increments by one -- each time a new transaction occurs, and
25 it represents just a unique ID for a specific transaction.

1 Q. Okay. So every time there was a transaction in Womply's
2 website for a particular application, was there a transaction
3 ID assigned?

4 A. Yes.

5 Q. Moving on to the next column where it says "remote ADDR."

6 A. Yes.

7 Q. What information is captured there?

8 A. These are IP for IP addresses.

9 Q. Do you know generally what an IP address is?

10 A. Yes.

11 Q. In a way that the jury could understand, what does it
12 mean?

13 A. Okay. So an IP address is a way for -- for an ISP or an
14 Internet service provider such as a Comcast or an AT&T, what
15 have you, to identify your account and your network of
16 computers within your home with regards to their services. So
17 they would assign it to you as a way for them to identify your
18 account within their service.

19 Q. So Womply is capturing the IP address that was used to
20 send the information to Womply?

21 A. Yes. That was assigned by the Internet service provider
22 of the individual.

23 Q. And do you see column C, "issued at"?

24 A. Yeah.

25 Q. What information is in that column?

1 A. That is a time stamp of when the transaction occurred.

2 Q. Okay.

3 A. In UTC.

4 Q. Column D, applicant user ID, what information is in that
5 column?

6 A. That is the user ID that was associated with making the
7 change to that record.

8 Q. Okay. Can you see all the user IDs in all of these rows?

9 A. Yes.

10 Q. Does it appear that they're all the same?

11 A. They are all the same.

12 Q. So these are all transactions for this unique user ID?

13 A. Yes.

14 Q. Do you see where it says "MCA application ID"?

15 A. Yes.

16 Q. What's that?

17 A. That is the internal application ID that is associated
18 with the various data that we collected on the user such as
19 first name, last name, business name, date of birth,
20 et cetera.

21 Q. Is the information in this spreadsheet based on column E
22 all for the same application ID?

23 A. In this case, yes. But the spreadsheet was generated, I
24 believe, by filtering on the user ID.

25 Q. Okay. Now, we're getting into the operation type. And

1 you said a zero was what?

2 A. An insert.

3 Q. I'm sorry?

4 A. An insert into the -- when you insert into the table -- a
5 creation.

6 Q. So zero means creation?

7 A. Creation.

8 Q. And one means?

9 A. Update.

10 Q. So like a change?

11 A. Yeah.

12 Q. And then operation table, is that the table that was
13 either -- you know, where the change was being made?

14 A. Exactly.

15 Q. And Womply saved its information in different tables
16 depending on what the information was?

17 A. Correct.

18 Q. So what is the MCA application's version table?

19 A. That is -- that is an audit table that we have or a log
20 table that tracks the changes to the application data over
21 time.

22 Q. Okay.

23 A. It is not the most recent data that we have in the
24 information but it's the change log.

25 Q. The change log, okay.

1 And the Plaid items version, what table is that?

2 A. That represents a change log to the various items -- so
3 I'm trying to explain this. So each time a user provides
4 their credentials, it creates a new item and table. So it is
5 one instance of the user providing us with credentials per
6 row.

7 Q. And the funding source version, that's another table.
8 What's stored there?

9 A. That's the account and routing numbers that are stored
10 there. And, again, the version tables are the log tables. We
11 have corresponding tables that represent the most current
12 information. And so you can imagine that there's a mirror;
13 right? There's one table that's what is the current data and
14 then the version table is how did we get to the current data.

15 Q. And then there's also a table for Persona inquiry. What's
16 stored there?

17 A. I believe the Persona inquiry table shows -- it's
18 primarily just for internal tracking -- but when did we start
19 the process for Persona?

20 Q. Okay. Now, current status, does it say "approved" with
21 each transaction?

22 A. If you can go up, please.

23 Q. Sure.

24 A. So I believe the columns H through -- yes, so columns H
25 through S are all static and they're all the same and they're

1 all joined by the data provided in the MCA application table.

2 Q. And this would have been looking at this on the date that
3 the table -- or this information was extracted?

4 MR. WILCOX: Objection to the leading.

5 THE COURT: Rephrase.

6 BY MR. SNIDER:

7 Q. Was the information that's in this Excel extracted on a
8 particular date?

9 A. I don't recall if we stored the dates -- oh, yeah, there
10 we go. Data as of 3/7/24.

11 Q. So what does that mean to you?

12 A. This means that this information was pulled on March 7,
13 2024.

14 Q. So is it fair to say that this is a historical lookback at
15 the application --

16 MR. WILCOX: Objection to the leading.

17 THE COURT: Overruled.

18 BY MR. SNIDER:

19 Q. Are we looking at historical information here?

20 A. We're looking at historical transactions that are joined
21 with the most recent information about the application.

22 Q. Thank you.

23 Now, this appears to all be for an application having
24 a first name of what?

25 A. Carolyn.

1 Q. And a last name of what?

2 A. Wade.

3 Q. With a date of birth of what?

4 A. March 7, 1975.

5 Q. And the address for all these transactions is what?

6 A. 6110 Reese Road, Apartment 207.

7 Q. Okay. City?

8 A. Fort Lauderdale.

9 Q. State?

10 A. Florida.

11 Q. ZIP?

12 A. 33314.

13 Q. Phone number?

14 A. (954) 274-6800.

15 Q. And there's a business phone. Is that the same?

16 A. Yeah, it's going to be the same for all in this case.

17 Q. And the email address is?

18 A. Ckidd1226@gmail.com.

19 Q. Okay. Now, let's go back over to the column B. Do you
20 see the IPs I have selected here ending in 166?

21 A. Yes.

22 Q. Can you tell from this spreadsheet the date in which those
23 transactions from the 166 IP address --

24 A. The ones that you have highlighted all appear to be from
25 May 4, 2021, from a time period of around 7:27 PM UTC

1 through till 7:51 PM UTC.

2 Q. And does it appear based on column G that there were
3 changes made from that IP address?

4 A. Yes, there were changes made to both the application as
5 well as applied table and then some funding source
6 information.

7 Q. But you can't tell from looking at that
8 spreadsheet particularly what --

9 A. No. The spreadsheet does not contain --

10 THE STENOGRAPHER: Stop. Please repeat. You were
11 talking over each other.

12 BY MR. SNIDER:

13 Q. Can you tell from looking at this spreadsheet what the
14 nature -- or what the changes were as reflected?

15 A. No, this spreadsheet does not contain the specific
16 changes.

17 Q. That would be in some other spreadsheet?

18 A. It would be -- yeah, it would be in the underlying table.

19 Q. Got it, underlying table.

20 So all you can tell from this is that there was --
21 what happened -- what can you tell from line 1 where it says
22 "0"?

23 A. So it means that the application was created on May 4th,
24 2021, at 7:21 PM UTC.

25 Q. From the IP address ending in?

1 A. 166.

2 Q. Okay. Now let's look at some lines. This is lines 20
3 through 26 of the Excel sheet.

4 A. Okay.

5 Q. Do you see the section that I've selected?

6 A. Yes.

7 Q. All right. What is the IP address -- you can read it in
8 full for the record -- for the section that I have selected?

9 A. The IP address in question for this section that you've
10 highlighted is 76.110.183.185.

11 Q. Okay. And what is the date that that IP address was
12 reflected in this spreadsheet as making changes to Womply?

13 A. Yeah. So the date range appears to be May 13th, 2021, at
14 12:59 PM UTC, and it goes until approximately 1:00 PM UTC.

15 Q. Now let's look at column F.

16 A. Okay.

17 Q. What number is in column F?

18 A. One.

19 Q. And what does that mean?

20 A. That means that in this case only updates were made to
21 that table.

22 Q. Okay. And what is the table that's being updated?

23 A. The name of the table in question here is the
24 public.mca_applications_version table.

25 Q. And, again, you can't tell just by looking at this

1 spreadsheet what those changes were?

2 A. Correct. The actual changes in question aren't listed.
3 It's just that something changed.

4 Q. I've selected another group of lines of data, lines 27
5 through 32 --

6 A. Yep.

7 Q. -- with the same IP ending in 166 that we looked at in
8 lines 9 through 19; correct?

9 A. Yes.

10 Q. And what is captured here with respect to the 166 IP
11 address?

12 A. So this looks like a different IP address came in than the
13 prior one -- about 21 minutes later. So starting at 1:21 PM
14 UTC through till 1:23 PM UTC on March 13, 2021. And they made
15 changes to the MCA applications version table and then also --
16 sorry -- they made changes to the MCA application table, and
17 it was recorded in the MCA application version table, and they
18 also started a Persona inquiry.

19 Q. Okay. Now I'm selecting a group of data, lines 33
20 through 47. Do you see that?

21 A. Yes.

22 Q. And what is the IP address that is shown here? You can
23 read it for the record.

24 A. Yeah. So the IP address listed here is 174.228.36.184.

25 Q. Does the table here reflect that that IP address was used

1 to make some changes to this application?

2 A. Yes.

3 Q. And what is the date in which those changes occurred?

4 A. This was also on May -- sorry -- on May 13, 2021. It
5 appears to be just a -- you know, maybe 40 minutes or so after
6 the prior set of transactions between 2:08 PM UTC and 2:51 PM
7 UTC.

8 Q. Okay. And what changes -- not the type of change but
9 where were the changes made? To what table?

10 A. So the changes were made to the MCA applications table and
11 stored in the MCA applications version table as well as the
12 Persona and Plaid tables.

13 Q. And do you know generally what kind of information is
14 stored in the MCA applications table?

15 A. Yes.

16 Q. What type of data is stored there?

17 A. So, typically, it would be your first name, last name,
18 date of birth, Social Security number. The funding summary is
19 there, the most recent Plaid item -- I'm just trying to
20 remember. We store some application metadata; that is, what
21 did the user enter in for their Schedule C information as well
22 as some demographic information that was required as a part of
23 the application.

24 Q. Okay.

25 A. A trade name.

1 Q. Was there information that was started in the Persona
2 table, according to this spreadsheet?

3 A. Sorry. What was the question?

4 Q. Sure.

5 Was there information that was started in the Persona
6 inquiry table?

7 A. Yes. It appears that there was a Persona inquiry started
8 during this time.

9 Q. Was there a change or a start of creation of information
10 in the Plaid table?

11 A. Yes. Correct.

12 Q. And there were some changes to the MCA application table
13 that you just described?

14 A. Yes.

15 Q. This spreadsheet also has a second tab where it says
16 "legend." Do you see that?

17 A. Yes.

18 Q. And does this generally describe the types of tables -- a
19 description of the tables that we just talked about?

20 A. Yes. This appears to be accurate.

21 Q. Okay. We're now going to take a look at Government
22 Exhibit 102.2E, which is another Excel spreadsheet in
23 evidence.

24 Okay. Mr. Thakral, I've published one Excel
25 spreadsheet. Do you see that?

1 A. Yes.

2 Q. Do you recognize the data that's in this spreadsheet?

3 A. Yes.

4 Q. What are we looking at here?

5 A. So this is the data coming from the MCA applications
6 versions table.

7 Q. Does this provide more detail than the spreadsheet we just
8 looked at?

9 A. Yes. This is the underlying data that was entered or
10 changed as part of the application process.

11 Q. Okay. And the first column here identifies what?

12 A. The first column identifies the application in question.

13 Q. Okay. The second column identifies?

14 A. The business name.

15 Q. The third column identifies?

16 A. When the application itself was created. So it's going to
17 be the same for all the rows here because the applications all
18 share the created timestamp.

19 Q. And this application was only created once?

20 A. Yeah.

21 Q. Column D shows what?

22 A. When was that row modified.

23 Q. Does that mean when the change occurred?

24 A. Change, yeah.

25 Q. Column E is what?

1 A. The date of birth.

2 Q. Column F is?

3 A. The phone number.

4 Q. Column G?

5 A. Address.

6 Q. Column H?

7 A. Postal code. City.

8 Q. Going from left to right here, column J?

9 A. State.

10 Q. Column K?

11 A. Email. Status.

12 Q. Column M?

13 A. Schedule C information entered by the user.

14 Q. Column N?

15 A. Oh, sorry. Column M will be either entered by the user or
16 by the system. It could be either.

17 Q. Okay.

18 A. And then similarly, the column N, that is for Schedule F,
19 if available -- sorry. Column M -- I apologize. Column M is
20 for tax year 2019, Schedule C. Column N is for tax year 2019,
21 Schedule F. Column O is for tax year 2020, Schedule C. And
22 column P is for tax year 2020, Schedule F.

23 Q. Okay. What's in column Q?

24 A. This is -- this is what's known as application metadata.

25 It is an internal representation of some data within -- about

1 the application that we captured.

2 Q. Okay. What's in column R?

3 A. This is -- this is the ID -- so this is the ID of the
4 login credentials that were used.

5 Q. Okay. And what is in column S?

6 A. The transaction ID.

7 Q. And that identifies the unique number for the change?

8 A. Correct.

9 Q. What's column T?

10 A. Column T is the end transaction ID.

11 Q. Do you know what column V is?

12 A. Yes. Column V is for this transaction, when was it
13 issued.

14 Q. Okay. And what's column W?

15 A. Column W is for this transaction, what is the IP address.
16 So columns V through X are joined -- come from a different
17 table. They're not stored in this table specifically, but we
18 join the data using the transaction ID.

19 Q. All right. And what's in column X?

20 A. The user ID.

21 Q. Do the user ID for all these transactions appear to you to
22 be the same?

23 A. Yes.

24 Q. So are you able, based on this spreadsheet, to give us a
25 little more detail about the specific changes that were

1 occurring on Womply's website to this application?

2 A. Sure.

3 Q. All right. So -- and sorry for all the back and forth
4 here, but let's start with -- I say back and forth. I mean
5 scrolling left and right.

6 So there's a group here of IP addresses ending in
7 166. Do you see that?

8 A. Well, it's a group for one IP address.

9 Q. Okay. I don't know what I said, but yes. There's a group
10 of data all having an IP address ending in 166 that I've
11 selected. Do you see that?

12 A. Correct. Yeah, I see it.

13 Q. So let's then scroll over selecting this 166 IP address.
14 Can you walk the jury through some of the changes that
15 occurred from that IP address? And if you need me to move
16 over to different columns, I will.

17 A. Yeah. So based on a visual inspection of what I'm seeing
18 here is the user created an application with their email and
19 phone number, and then they entered in their address, and then
20 they entered in their date of birth, and then -- I can't see
21 what -- what else was changing after that.

22 Q. Okay. So, for example, line 2 is blank and line 3 has
23 a -- it's populated with a ZIP code 33314. What does that
24 mean?

25 A. So it means that the change in row 3 was that the user

1 entered in a postal code for that column at the time stamp
2 listed in the issued at column.

3 Q. So this is showing every time --

4 A. Yeah.

5 Q. -- a change -- type in the ZIP code. That's where it went
6 and where it occurred --

7 A. Correct.

8 Q. -- from the 166 IP address --

9 A. Yes.

10 Q. -- this date and time?

11 A. Correct.

12 Q. Now, let's look at the next IP address -- by the way, does
13 this appear to you to be in chronological order?

14 A. Based off of a quick visual inspection, yes.

15 Q. So starting from earliest in time and moving forward later
16 in time?

17 A. Correct.

18 Q. I've selected Rows 11 through 17 of Government 102.2E. Do
19 you see that?

20 A. Yes.

21 Q. And what is the IP address that I've selected?

22 A. It ends in 125.

23 Q. Okay. Now, moving back over to columns -- well, let's go
24 all the way over.

25 Can you tell from the section that I've selected

1 here, lines 11 through 17, the changes that were made to this
2 application from the 125 IP address -- ending in 125?

3 A. Based on what I'm seeing on the screen right now, the only
4 change that I can visually see so far is the entering of a
5 2019 Schedule C total of 96,882.

6 Q. Okay. Does it appear to you from this data that that IP
7 address made any other changes?

8 A. Not from what I see on the screen right now.

9 Q. And just looking at column W --

10 A. Yeah.

11 Q. -- do you see the IP address ending in 125 anywhere except
12 lines 11 through 17?

13 A. No.

14 Q. Let's go to the next group of data. It's lines 18
15 through 22 of Government 102.2E. Do you see what I've
16 selected?

17 A. Yes.

18 Q. What is the IP address that I've selected?

19 A. It's ending in 166.

20 Q. Can you tell from this spreadsheet what changes were made
21 in the lines of data that I've highlighted?

22 A. Based on what I can see on the screen right now, the only
23 change that I see is that the application went from a started
24 state to a requested state; that is, the user submitted the
25 application to Womply.

1 Q. Okay. And what's the date on which that occurred? Let me
2 go over a little more to the -- can you tell from column D,
3 the modified -- the information in D where it says "modified,"
4 can you tell the date in which that occurred?

5 A. I believe it's on May 13, 2021, at 1:23 --

6 Q. And I should have asked you this, but if you need me to
7 highlight the rows again, I will. But with respect to that
8 change to the tax information, what date did that occur?

9 A. That also occurred on May 13th, 2021, just a few minutes
10 before -- let's try -- not a few minutes. It looks like maybe
11 about 20 minutes before.

12 Q. 20 minutes before, okay.

13 Now let's look at lines 24 -- by the way, I notice
14 there's no IP in line 23. Does that mean that an IP was not
15 captured?

16 A. It might -- if you can go to the rest of the row, I can
17 kind of understand what would happen there. Awe. Yes.

18 So in this case, the application was changed from a
19 requested state to a pending approved state. This was done by
20 a system process. And so no IP was captured because it was
21 done by the system. The system didn't record its own IP
22 address.

23 Q. Because the system is Womply's system, not the user?

24 A. Correct. This was not a user change at all --

25 Q. Okay.

1 A. -- in that missing user ID row.

2 THE COURT: All right, sir. It's 12:00 noon. We're
3 going to recess for lunch. We will resume at 1:05 PM.

4 Remember not to discuss the case in any way, ladies
5 and gentlemen. Enjoy lunch.

6 (Jury exited at 12:00 PM.)

7 THE COURT: Government, can you advise me when we
8 return, the tax return that you referenced yesterday, what
9 exhibit was that? And the first exhibit today, what was that
10 exhibit number?

11 MR. SNIDER: Absolutely. I can tell you now or --

12 THE COURT: Oh, if you have it.

13 MR. SNIDER: Okay. So the first exhibit today was
14 Government Exhibit 100.

15 THE COURT: All right.

16 MR. SNIDER: And the tax return --

17 THE COURT: And was that the only one yesterday, the
18 tax return?

19 MR. SNIDER: Oh, you wanted all the exhibits from
20 yesterday.

21 THE COURT: That were referenced that you discussed
22 here. I know they're all in evidence.

23 You may step down, sir. We're going to resume at
24 1:05 PM. You may depart. And everyone else may depart, if
25 you like. I'm just trying to get a few little notes.

1 You can do it after lunch, if you like.

2 MR. MCCRAY: Exhibit 113 is the Schedule C.

3 THE COURT: Thank you.

4 And how are we progressing, Government -- more
5 importantly?

6 MR. SNIDER: I probably have 20 or 25 minutes left
7 with this witness.

8 THE COURT: Do you think we're still on schedule to
9 have you complete your case tomorrow?

10 MR. SNIDER: Yes.

11 THE COURT: All right. Thank you. Enjoy lunch.

12 MR. SNIDER: I have those answers for the Court. So
13 the tax return -- I'm not sure which --

14 THE COURT: I think he said it was 113.

15 MR. SNIDER: That's the Schedule C.

16 THE COURT: The Schedule C? Yes. Was that the only
17 one you referenced yesterday?

18 MR. SNIDER: I referenced a document in my opening
19 but --

20 THE COURT: Well, no --

21 MR. SNIDER: As far as the tax document --

22 THE COURT: -- just your case in chief. It was 113.

23 MR. SNIDER: 113 is the Schedule C submitted with the
24 PPP loan application.

25 THE COURT: All right. Thank you.

1 (Lunch recess at 12:03 PM.)

2 (Jury enters at 1:06 PM.)

3 THE COURT: You may continue with your direct
4 examination.

5 MR. SNIDER: Thank you, Your Honor.

6 CONTINUED DIRECT EXAMINATION

7 BY MR. SNIDER:

8 Q. Mr. Thakral, before the lunch break, we were taking a look
9 at information that's displayed in Government Exhibit 102.E,
10 which is still being published. Do you see that?

11 A. Yes.

12 Q. And we were walking through some of the transactions that
13 Womply recorded with respect to this PPP application for
14 Carolyn Wade; correct?

15 A. Yes.

16 Q. And the spreadsheet that we're looking at, 102.2E, that
17 contains changes that were made to one of the tables that
18 collected information for the application?

19 A. Yes.

20 Q. And prior to the lunch break, we had reviewed changes that
21 were made using, according to Womply's record, IP address
22 ending in 166 and 125; is that right?

23 A. Yes.

24 Q. So now I want to take a look at the section of the data
25 that I've selected with the IP address ending in 184. Do you

1 see that?

2 A. Yes.

3 Q. Can you read the full IP address for the record?

4 A. The IP address that is highlighted on the screen right now
5 is 174.288.36.184.

6 Q. And based on this record, does it appear that there were
7 changes made to the PPP application for Carolyn Wade from this
8 IP address ending in 184?

9 A. There appears to be changes, yes.

10 Q. Okay. And if I scroll over left -- and for the record, I
11 have selected lines 24 through 34 of Government
12 Exhibit 102.2E. Do you see the section that I've selected
13 with the gray shading?

14 A. I do.

15 Q. Okay. Can you tell from just looking at this what at
16 least one of the changes was that was made?

17 A. Based on a visual inspection of what I'm seeing on the
18 screen, the only change that I can make out is a change in the
19 address. So the address, line 1, was capitalized, and a
20 period was removed from RD, and then the city, I believe, was
21 changed from Davie to Fort Lauderdale.

22 Q. Okay. And there are other lines of data here that I've
23 selected; correct?

24 A. Yes.

25 Q. And that's also from the 184 address?

1 A. I believe so, yes.

2 Q. We'll go to the right just so that you can confirm.

3 A. Yes.

4 Q. That's all from the 184?

5 A. Yes.

6 Q. Now, did you have to be logged in to Womply's website in
7 order to make changes like this?

8 A. Correct.

9 Q. And once you were logged in to in this case the account
10 for Carolyn Wade's PPP loan application, what was the
11 experience like as far as -- what were you able to see?

12 A. Is the question what was the user able to see after
13 logging into the website?

14 Q. Correct.

15 A. Okay. So the user would have seen -- it depends on the
16 status of the application, I believe. But generally speaking,
17 the user would have seen the information that they had
18 provided. And in some cases they would have been able to
19 modify the information that they provided as required --

20 Q. Let me stop you right there. When you say they provided,
21 if information had been previously entered, as we are seeing
22 in Government Exhibit 102.2E --

23 A. Yes.

24 Q. -- the information previously entered, would that have
25 been able to be seen when you logged in subsequently?

1 A. Yes, correct.

2 Q. So, for example, the information that had been supplied
3 using an IP address 166, would that have been able to be seen
4 if you were logging in later?

5 A. Yes.

6 Q. Information that was supplied, for example, from the IP
7 address ending in 125, if you're later logging in, for
8 example, from 184, were you able to see the information
9 previously supplied?

10 A. Yes.

11 Q. Now, at the bottom here, there are a few other lines of
12 data, and that's 35 through 41. Do you see that?

13 A. Yes.

14 Q. Is that user-entered data or is that data that was changed
15 by Womply's system?

16 A. This appears to be system data because there is no user ID
17 associated with it, and the nature of the data changes in
18 column Y and Z appear to be system-generated messages.

19 Q. Do you remember during your testimony before lunch you
20 were explaining that document that had the tax information --
21 the record of the tax information? It was Government
22 Exhibit 108.

23 And when we were going over that, I was asking you
24 about the user-entered detail versus what the computer read
25 when it scanned it. Do you remember that?

1 A. Mm-hmm.

2 Q. And you said there was a change that occurred
3 automatically based on the computer's reading of the --

4 A. The application, yes. Correct.

5 Q. Do you see that transaction -- the computer changing it
6 anywhere in this spreadsheet?

7 A. Row 35.

8 Q. So let me select Row 35. That is reflecting the change?

9 A. Yes.

10 Q. And if a user had logged in after this, would they have
11 been able to see the updated information?

12 A. Yes.

13 Q. Now, the spreadsheet we're looking at here is a list of
14 transactions -- modifications to a certain table in Womply's
15 database?

16 A. Mm-hmm.

17 Q. Did Womply capture a record -- did it make a record or a
18 log of just logins to its website?

19 A. Yes.

20 Q. So if a user logged in to Womply's website and didn't make
21 any changes, that information would not be in this
22 spreadsheet, would it?

23 A. No.

24 Q. Does Womply have a record of all of the logins to this
25 particular account?

1 A. Yes. There is a table.

2 Q. I'm publishing for the jury what is in evidence as
3 Government Exhibit 102.1E.

4 Do you see Government Exhibit 102.1E on your screen?

5 A. Yes.

6 Q. What is Government Exhibit 102.1E?

7 A. This appears to be the -- a table of the user logins.

8 Q. The information in this spreadsheet, is that capturing
9 every time a login occurred --

10 A. Yes.

11 Q. -- to Carolyn Wade's account?

12 A. Correct.

13 Q. How can you tell that this is the login to the Carolyn
14 Wade PPP application account?

15 A. So this table is a filtered view of the source table, and
16 it was filtered on -- by searching for two identifiers. So
17 the table was restricted to only those identifiers that are
18 unique in column A, which are an email address and a phone
19 number.

20 Q. What's the email address?

21 A. Ckidd1226@gmail.com.

22 Q. And what's the phone number?

23 A. (954) 274-6800.

24 Q. And to log into this account for Carolyn Wade, would you
25 have had to have used either the email address or the phone

1 number --

2 A. Correct.

3 Q. -- that's in table A --

4 A. Yes.

5 Q. -- column A?

6 A. Yes. Generally speaking, it was one of the other -- it
7 was required.

8 Q. Okay. And you testified in the morning about how a user
9 using either the email address or phone number to log in --
10 how they were able to access?

11 A. Yeah.

12 Q. If a user was using the email address, what happened?

13 A. If a user was using the email identifier to log in, they
14 would have received a unique verification code -- I can't
15 remember if it was four or six digits long -- and that would
16 get sent to their email address. The code was short-lived, I
17 believe -- less than fifteen minutes -- and they would have to
18 provide that code into the website correctly.

19 Q. Okay. And if a user was using a phone number to log in,
20 what was the process there?

21 A. In a similar manner, instead of sending it via email, it
22 would go to the individual's phone via text message.

23 Q. Okay.

24 A. And then from the text message, they would enter the
25 numbers they received in the text message into the website to

1 log in.

2 Q. So looking at line two of the data in Government Exhibit
3 102.1E --

4 A. Yes.

5 Q. -- what was used for that login?

6 A. It was an email address.

7 Q. And what information is in column B?

8 A. So column B is when the login was attempted.

9 Q. Okay. What information is in column C?

10 A. Whether or not the login was successful.

11 Q. What does true mean?

12 A. True means that the login was successful and a correct
13 code entered in.

14 Q. What does false mean?

15 A. It means a login was not successful. And so a code may or
16 may not have been put in. I can't remember if we included
17 expirations on this part or not, but generally speaking, the
18 user was not able to log in.

19 Q. What is in column D?

20 A. It looks like an identifier for the login attempt.

21 Q. Did Womply assign a unique number to each login attempt?

22 A. Yes.

23 Q. What information is in column E?

24 A. The -- the web browser that was being used.

25 Q. To log into Womply's portal?

1 A. Yes.

2 Q. What information is captured in column F?

3 A. The operating system that was used.

4 Q. What information is captured in column G?

5 A. The IP address that was being used or the IP address and
6 where the login attempt was coming from.

7 Q. Okay. And what information is in column H?

8 A. Column H is the user agent that was used for the login
9 attempt, that is, which browser was being used specifically
10 with some additional details.

11 Q. And what are those additional details provided in the user
12 agent column?

13 A. So the user agent provides -- in this case it looks like a
14 version of the operating system. So Windows 10. So -- this
15 is for the first row, as an example. So in Row 1 the
16 information that I see there is they are using a Windows 10
17 machine, and they're using a specific version of the browser.
18 And that version of the browser ends in 818.56. And from
19 here, I can't actually tell which browser it is, but there are
20 tools available to interpret this user agent information.

21 Q. Okay. Let's look at line 15. Do you see that?

22 A. Yes.

23 Q. Do you know what information as far as the user agent is
24 provided in line 15?

25 A. This appears to be an Android operating system. I believe

1 that SM-986U, that appears to be a model number. I would have
2 to get confirmation, but it appears to be the model number of
3 a phone. And the version of the browser, I believe, is at the
4 very end there -- 537.6 -- 537.36.

5 Q. If I can highlight this, just so it's clear.

6 In line 15, row H, can you read what you believe to
7 be is the model number of the device that logged in?

8 A. Yeah. It looks like it is SM-986U.

9 Q. Okay.

10 A. Sorry. SM-N986U. Correction.

11 Q. What is the IP address that logged in associated with that
12 device?

13 A. 174.228.36.184.

14 Q. One of the things that we can do in Excel is something
15 called filter. Are you familiar with filter technology --

16 A. Yes.

17 Q. -- or filter functionality?

18 So if I filter on the IP address ending in 184, have
19 I filtered all of the instances in this spreadsheet, based on
20 your understanding --

21 A. It appears so.

22 Q. -- for the 184 IP address?

23 A. Yes.

24 Q. And what is the model number of the device that was used
25 to log in on that 184 IP address?

1 A. It appears to be the same across all of these different
2 logins, and it's the SM-N986U.

3 Q. And what are the dates of this login?

4 A. All of the -- all of the attempts here appear to be on
5 May 13, between 2:04 PM UTC and 2:16 PM UTC.

6 Q. Let's look at another one. Do you see the 166 --

7 A. Yes.

8 Q. -- I filtered?

9 A. Yes.

10 Q. And what's the time of that login?

11 A. It appears to be May 13th, 2021, at 12:23 PM and 1:21 PM
12 UTC.

13 Q. And the 125, is there a login from that?

14 A. Yes. It's -- it appears to be across two dates. The
15 first date is May 13, 2021, and the second date is June 1st,
16 2021 -- sorry. There's actually three dates. I apologize.
17 There are three dates: May 13, 2021; June 1st, 2021; and
18 June 7th, 2021.

19 Q. And what was the device, according to the user agent
20 field, that was used?

21 A. I don't see a device ID here. I just see that it's a
22 Windows operating system. Windows 10 is what it looks like.

23 Q. So different than the device we just looked at?

24 A. Yes.

25 Q. And I'm going to circle all of them again. Do you see how

1 I've filtered column F, the operational system --

2 A. Yeah.

3 Q. -- that you testified is in column F? And I filtered it
4 for Android. Do you see that?

5 A. Yes.

6 Q. What is the model number that you see when I filter for
7 Android?

8 A. These appear to all be the same model number, SM-N986U.

9 Q. Okay. And what are the login dates that you see
10 associated with this?

11 A. There appears to be a number of them. So starting with
12 May 13th, May 20th, May 22nd, June 5th, and July 26, all of
13 2021.

14 Q. And when that login occurred using that device, anything
15 that had been previously entered would have been visible?

16 A. Yes.

17 Q. There's a second sheet on this Excel down in 102.1E; is
18 that right?

19 A. Yes.

20 Q. I'm going to click on that.

21 What information is in the sheet that's titled
22 events?

23 A. This appears to be a series of time stamps associated with
24 when a file was uploaded or a bank account was linked.

25 Q. Okay. Does it appear to be in chronological order?

1 A. Yes.

2 Q. So according to this, what is the first type of document
3 that was uploaded?

4 A. So a bank document was uploaded on May 4th, 2021, at
5 7:47 PM UTC.

6 Q. What IP address was used to upload that bank document?

7 A. An IP address ending in 166.

8 Q. Okay. And can you tell from the user agent what type of
9 device was doing that?

10 A. It appears to be a Windows machine.

11 Q. Okay. The second row here, what do you see in that row?

12 A. The linking of the bank account.

13 Q. Okay. That was through the Plaid system?

14 A. Yes.

15 Q. What IP address was used for that event?

16 A. Also ending in 166.

17 Q. And what model or computer was used for that event?

18 A. It appears to be the same machine because the user agent
19 is also identical and it matches the version as well above.

20 Q. What's the next event you see on this sheet?

21 A. This appears to be an upload of a tax document.

22 Q. Okay. And what is the IP address that appears to have
23 uploaded that tax document?

24 A. The IP address ends in 125.

25 Q. And what's the date?

1 A. May 13.

2 Q. And what's the time?

3 A. May 13 at 12:59 PM UTC.

4 Q. That's universal --

5 A. Coordinate time.

6 Q. -- coordinate time.

7 And what type of computer uploaded that tax document,
8 if you can tell?

9 A. It appears to be a Windows machine as well, but there's a
10 slight change in the version, I believe, of the browser. So
11 the prior version ended in .42 and this one ends in .56.

12 Q. Do you see any other events on this spreadsheet associated
13 with the IP address ending in 125?

14 A. No.

15 Q. Now let's take a look. Do you see some events with an IP
16 address being used ending in 184?

17 A. Yes.

18 Q. What do you see? We'll start with the first one.

19 A. Yeah. So the first one is the uploading of a bank
20 document.

21 Q. When did that occur?

22 A. On May 13th at 2:44 PM UTC.

23 Q. And what type of device was used to upload that bank
24 document?

25 A. It appears to be a mobile phone -- assuming that the SM is

1 a model number. It's SM-N86U.

2 Q. Okay. What's the next event you see using the 184 IP
3 address?

4 A. The linking of a bank account.

5 Q. When did that happen?

6 A. It happened at 2:47 PM UTC. So approximately three
7 minutes later.

8 Q. And was this after the tax document was uploaded?

9 A. Yes.

10 Q. And what was the device used to link that bank account?

11 A. It appears to be a mobile device with the model SM-N86U.

12 Q. What's the next event you see?

13 A. The uploading of a bank document.

14 Q. Okay. When did that happen?

15 A. Approximately 20 seconds after the previous event.

16 Q. Okay. It's also from the IP address ending in 184?

17 A. Yes. Correct.

18 Q. And this is after the tax document is uploaded?

19 A. Yes.

20 Q. What is the device that uploaded that bank document?

21 A. It's the same device as before.

22 Q. What's the next event you see?

23 A. The linking of a bank account.

24 Q. Okay. And when did that happen?

25 A. It happened approximately one minute and 20 seconds after

1 the first event -- sorry -- after the prior event.

2 Q. From what IP address?

3 A. From the same IP address ending in 184.

4 Q. And from what device?

5 A. It appears to be the same device.

6 Q. What's the next event you see?

7 A. The next event is an uploading of another bank document.

8 Q. When did that occur?

9 A. That occurred approximately -- so what is that -- a
10 minute, eight seconds after the previous one.

11 Q. What IP address?

12 A. Ending in 184.

13 Q. And what device?

14 A. The same device as before.

15 Q. What's the next event you see?

16 A. The linking of a bank account.

17 Q. When did that occur?

18 A. One minute and 52 seconds after the prior event.

19 Q. And what IP address?

20 A. The same IP address and the same device.

21 MR. SNIDER: One second, Your Honor.

22 The Government tenders the witness for
23 cross-examination.

24 MR. WILCOX: Give me a second, young man.

25 THE WITNESS: Good afternoon.

1 MR. WILCOX: May I proceed, Your Honor?

2 THE COURT: Yes, sir.

3 CROSS-EXAMINATION

4 BY MR. WILCOX:

5 Q. Aman Thakral?

6 A. Aman Thakral.

7 Q. Aman Thakral?

8 A. Yeah.

9 Q. The H is silent?

10 A. Correct.

11 Q. All right. I just want to make sure I got your name.

12 A. Thank you for that.

13 Q. The H is silent.

14 Now, I believe you testified at the beginning a while
15 back ago that you're a Womply consultant?

16 A. I'm currently consulting for Womply, yes.

17 Q. Now, did you have to respond to any subpoenas sent to you
18 by the Government?

19 A. Yes.

20 Q. Okay. And what did it ask you to bring?

21 A. What did it ask me to bring?

22 Q. Yeah. I mean, was it a subpoena duces tecum? Did it ask
23 you to submit records? Anything like that?

24 A. It didn't ask me to submit records directly, no.

25 Q. Okay. Do you know whether or not Womply had submitted any

1 records pursuant to a subpoena --

2 A. Yes, I believe so.

3 Q. Hmm?

4 A. Yes, I believe so.

5 Q. Are you aware whether the Government issued -- do you know
6 whether the Government issued a subpoena to Womply requesting
7 any and all records associated with the PPP loan filed by
8 Carolyn Wade?

9 A. Sir, can you please repeat the question?

10 Q. Do you know whether or not the government issued a
11 subpoena to Womply requesting any and all records associated
12 with the PPP loan application of Carolyn Wade?

13 A. I'm not familiar with any subpoena personally. I was not
14 involved in that process.

15 Q. Okay. Just one moment, please.

16 Now, Mr. Thakral, now, you've testified for quite a
17 bit of time here and I noticed you kept using the term user.

18 A. Yes.

19 Q. Now, educate me. Now, the user is the person that's
20 actually on the computer at a given time or on the website at
21 a given time?

22 A. In this case, the context of a user is someone who's
23 associated with a particular user ID. So it is an identifier
24 of a set of credentials -- sorry -- a set of identifiers. So
25 it's the person that is using the email and/or phone number to

1 log into the website.

2 Q. Okay. Let me make sure -- I want to repeat exactly what
3 you said. When you used the word user, you're referring to
4 the person who is using the email address and the phone number
5 to log into the device?

6 A. Yes.

7 Q. Okay. Now, the user does not necessarily have to be the
8 borrower. Would you agree with that?

9 A. It's possible, yes.

10 Q. Possible. I mean, would it be -- when you say possible,
11 are you saying that it's unlikely or --

12 A. No, I'm not stating anything with regards to a
13 probability.

14 Q. Okay.

15 A. I'm just saying it's a possibility.

16 Q. Okay. So the user and the borrower can be different
17 people?

18 A. Assuming that they have access to the same underlying
19 information, which is the email and/or phone.

20 Q. Well, a borrower wouldn't be able to do that -- right? --
21 give the login information to a user?

22 A. So if they gave their email credentials or their phone --
23 or they physically gave their phone number or shared the code
24 that came in, then yes, they could do that.

25 Q. So anybody that had that information can just act on

1 behalf of the borrower?

2 A. Yes, but with -- but they are sharing those credentials
3 with them, correct.

4 Q. Okay. I want to make sure I understand what you said.
5 Could you repeat that again?

6 A. The only way that they can gain access is if they have
7 underlying access to either the device itself or the email
8 address.

9 Q. Okay. And when you say underlying access, you mean the
10 login information that the person who signed up for the
11 account would need to get into it; is that right?

12 A. Yeah. They would need the email address on file and/or
13 the phone number.

14 Q. Okay. So if a person applying for a PPP loan gave another
15 person that information, the email address and the phone
16 number, that person could log in and apply for the PPP loan on
17 behalf of the borrower; is that right?

18 A. If they -- if they gave them access to -- yes, to
19 either --

20 Q. Let's assume that they did --

21 A. Yeah. So assuming they did, then, yes, they would be able
22 to carry out actions as if they were the user.

23 Q. Right.

24 And there would be no way of telling who was actually
25 the user at a given particular time; is that right?

1 A. Well, no, there are IP addresses and user agents, as we've
2 seen, and which ultimately can be traced back to an
3 individual, depending on what it is.

4 Q. Could you repeat that again? I just want to make sure I
5 understood you.

6 A. So whenever someone logs in, they're also logging in from
7 a device that's on a network somewhere, and that device has an
8 IP address and it also has what's known as a user agent, which
9 is the browser that they're -- being used. And so the
10 combination of -- the IP address in particular is also often
11 associated with something on a network -- like, it could be a
12 phone or it could be -- it could be that they're using Comcast
13 or AT&T, and those two things could be tied together to a
14 household, for example.

15 Q. Now, I believe you testified that there were four or maybe
16 five IP addresses associated with the PPP loan application at
17 issue in this case?

18 A. I don't recall how many there were, but there were
19 several, yes.

20 Q. Several is fine. Several is fine.

21 So there are several IP addresses associated with
22 this PPP loan application. That means either one person was
23 using different devices -- is that right?

24 A. Possibly, yes --

25 Q. It could -- I'm sorry. Go ahead.

1 A. I don't think you can tell from that information alone.

2 Q. Let me ask it again because I'm not sure you answered my
3 question.

4 A. Okay. Sure.

5 Q. We know that there were several IP addresses associated
6 with the PPP loan application of Carolyn Wade; is that right?

7 A. That's what it appears, yes.

8 Q. Okay. Now, that could either mean -- one explanation
9 would be that one person was using several devices --

10 A. Yes, in several different places.

11 Q. Right. Okay.

12 Or it could mean several people were actually
13 involved in the PPP loan application process?

14 A. Correct. Either one of those things could be true. It's
15 impossible to tell with the information that we have at hand.

16 Q. So let me ask you this because you introduced -- okay. We
17 had Exhibit 100.

18 Can we turn on the ELMO for me, please? Thank you.
19 And can we publish it to everybody?

20 Now, I believe you indicated that -- well, I believe
21 you testified or -- I need to -- I believe you testified that
22 one of these loans were declined.

23 A. Correct. Yes.

24 Q. And what day was that?

25 A. What day was what? Sorry.

1 Q. The loan declined.

2 A. It doesn't say when the loan was declined.

3 Q. Well, there's a date on here.

4 A. Yeah, that's the date that the record was entered into
5 Teslar. That's the created date. There's no date of when the
6 loan was declined.

7 Q. Well, do you have that information?

8 A. I'd have to look it up in a database somewhere.

9 Q. Okay. And the first loan -- do I have it right, the first
10 loan was declined?

11 A. No, the bottom loan was declined. And the top loan was
12 funded.

13 Q. We're looking at Exhibit 100?

14 A. Yes. Yeah. And you can tell that it was funded because
15 the top loan has an SBA loan number associated with it.

16 Q. The bottom loan was declined?

17 A. Yes. There is a column called deal stage name, and that
18 column indicates that it's declined -- sorry -- that it was
19 declined.

20 Q. But you don't know what date it was declined?

21 A. Yeah. It's not on this document.

22 Q. Well, can you -- well, it was declined before the other
23 one was approved; right?

24 A. Yes, that's correct. Chronologically speaking, that's
25 correct.

1 Q. Okay. So can you tell us when the loan that was approved?

2 A. It's not on this document.

3 Q. One moment, Your Honor.

4 Let me just cut to the chase, Mr. Thakral.

5 Okay. The defense's position or our theory of the
6 case is that the person hired by Ms. Wade completed a loan
7 application and included information in the loan application
8 without her knowledge. Do you follow me?

9 A. Okay.

10 Q. In all of these exhibits, in all of the things you said
11 today, is there anything that would refute our defense?

12 MR. SNIDER: Objection.

13 THE COURT: Sustained. You're going to have to
14 rephrase that, sir.

15 BY MR. WILCOX:

16 Q. Are you aware of any facts that would refute our defense?

17 MR. SNIDER: The same objection.

18 THE COURT: Sustained.

19 MR. WILCOX: One moment, Your Honor.

20 BY MR. WILCOX:

21 Q. Let me ask it another way.

22 Can you tell by any of the exhibits whether Ms. Wade
23 was the person that completed the application?

24 A. I don't have any -- I don't have enough information to
25 answer that question.

1 Q. Well, you can't answer that question; is that correct?

2 A. There's not enough information provided to me.

3 Q. Sir, can you tell us whether or not Ms. Wade filled out
4 the PPP application that's at issue in this case?

5 A. I can't tell.

6 MR. WILCOX: Thank you.

7 I don't have anything else, Judge.

8 MR. SNIDER: No redirect, Your Honor.

9 THE COURT: May the witness be permanently excused?

10 MR. SNIDER: Yes, Your Honor.

11 MR. WILCOX: Yes, Your Honor.

12 THE COURT: You may step down. You are excused.

13 THE WITNESS: Thank you.

14 MR. SNIDER: The United States calls Dion Morrow.

15 (Government witness, DION MORROW, duly sworn.)

16 COURT CLERK: Please state and spell your name.

17 THE WITNESS: My name is Dion Morrow. Dion is
18 spelled D-I-O-N. Morrow, M-O-R-R-O-W.

19 DIRECT EXAMINATION

20 BY MR. SNIDER:

21 Q. Good afternoon, Mr. Morrow.

22 A. Good afternoon.

23 Q. Can you please tell the jury where you work.

24 A. Verizon.

25 Q. What's your position at Verizon?

1 A. My title is senior analyst, customer service, and business
2 support operations.

3 Q. How long have you been employed with Verizon?

4 A. 18 years.

5 Q. And your position as a senior analyst, how long have you
6 been in that position?

7 A. Just under eight years.

8 Q. What do you do as a senior analyst for Verizon?

9 A. Among my duties, I am a custodian of records.

10 Q. Okay. What do you do as a custodian of records?

11 A. I appear to testify to Verizon's billing and network
12 records when they are issued under subpoena.

13 Q. Are you here today representing Verizon pursuant to a
14 subpoena that the United States served upon Verizon?

15 A. Yes.

16 Q. In your capacity as a representative for Verizon, are you
17 familiar with Verizon's records?

18 A. Yes.

19 Q. Did Verizon produce to the United States records pursuant
20 to the subpoena that I just asked you about?

21 A. Yes.

22 Q. Are you familiar with the records that Verizon produced to
23 the United States?

24 A. Yes.

25 Q. And did you have a chance to review them before coming

1 here today?

2 A. Yes.

3 Q. What kind of company is Verizon?

4 A. Verizon is a wireless services company. We provide
5 services for wireless phone calls, text messaging, and
6 Internet usage.

7 Q. And Verizon has customers that it provides those services
8 to?

9 A. Yes.

10 Q. What's a retail customer?

11 A. Well, that's a good question. I'm not sure if I can
12 answer that one. I know that if you go to a retail store to
13 get your service started, I suppose you could be called a
14 retail customer.

15 Q. Like an individual customer? That's a better way --

16 A. Yes, individual.

17 Q. Okay. And does it keep records of the services that it
18 provides to its customers?

19 A. Yes.

20 Q. Does it keep billing records?

21 A. Yes.

22 Q. Does it keep records of who was the person whose name the
23 account was in?

24 A. Yes.

25 Q. Is that called a subscriber?

1 A. Yes.

2 Q. Does Verizon keep records of phone calls that are made on
3 Verizon Wireless's phone network?

4 A. Yes.

5 Q. Are those called toll records?

6 A. Not internally, but, yes, they can be classified as that.

7 Q. Does Verizon keep records of devices that are used on
8 Verizon's network belonging to a particular account?

9 A. Yes.

10 Q. Does it keep other records, like payment records?

11 A. Yes.

12 Q. And are you familiar with all those records that I just
13 mentioned?

14 A. Yes.

15 Q. I'm going to publish for you Government Exhibit 801, which
16 is in evidence, and I'll represent to you that this is a PDF
17 of a spreadsheet. It's in a PDF form. Do you recognize the
18 type of information that is on your screen in Government
19 Exhibit 801?

20 A. Yes.

21 Q. What type of information is this?

22 A. This is a printout of subscriber details.

23 Q. Okay. Does it look like there's some columns here?

24 A. Yes.

25 Q. All right. Have you seen this version of this document or

1 this information in Excel?

2 A. Yes.

3 Q. And Excel has columns?

4 A. Yes.

5 Q. So let's look at the first column where it says "search
6 value." Do you see that?

7 A. Yes.

8 Q. Do you understand what's in that column?

9 A. Yes.

10 Q. What is it?

11 A. So the search value is the information that was input in
12 order for us to locate other details related to this
13 information. This particular information is a ten-digit phone
14 number.

15 Q. Okay. What's the phone number, for the record?

16 A. The area code (954) 274-6800.

17 Q. The next two columns say "search start date" and "end
18 start date." Do you see that?

19 A. Yes.

20 Q. Do you have an understanding of what that means?

21 A. Yes.

22 Q. Tell the jury, please.

23 A. So that is the period of time that we used for our search
24 of that particular phone number.

25 Q. Okay. And does it appear that there were some results as

1 a result of that search?

2 A. Yes.

3 Q. Okay. Do you know what MTN is?

4 A. Yes. That is the mobile telephone number.

5 Q. It's the same phone number that we looked at for the
6 search value?

7 A. That's correct.

8 Q. Okay. The next column says account number. Do you see
9 that?

10 A. Yes, I do.

11 Q. Is that the Verizon account number that's associated with
12 this phone number?

13 A. Yes.

14 Q. Do you see where it says "last name" and "first name"?

15 A. Yes.

16 Q. What information is there?

17 A. The first and last name of the account owner.

18 Q. The owner?

19 A. Yeah, or the subscriber.

20 Q. And then I see what looks like an abbreviation, ADDR,
21 line 1. Do you see that?

22 A. Yes.

23 Q. What is that information there?

24 A. That is the provided address -- the address that was
25 provided to us by the subscriber.

1 Q. Okay. Now I'm going down to page 2 of Government 801,
2 which is a continuation of the same line of data from Excel.
3 Do you see where it says "city, state, and ZIP code"?

4 A. Yes.

5 Q. Is that a continuation of something?

6 A. Yes. That's the continuation of the address provided to
7 Verizon by the subscriber.

8 Q. And do you see where it says "contact name, first and
9 last"?

10 A. Yes.

11 Q. What's that information?

12 A. That allows the subscriber to give us a different contact
13 name if they do not wish to be the point of contact. In this
14 case, the subscriber provided the same information as the
15 contact as well as the account owner name.

16 Q. And then it appears there's a home phone number and
17 contact. Is that associated with the account contact?

18 A. Yes.

19 Q. I'm going to page three. There's some information on page
20 three of Government 801 -- contact city, contact state,
21 contact ZIP code. Is that all related to the point of contact
22 we just talked about?

23 A. That's correct.

24 Q. Then I see MTN, an effective date and disconnect date and
25 type. Tell us about that.

1 A. So that would be the date that the phone number that was
2 searched by was effective on Verizon's network to the date
3 that it was disconnected.

4 Q. What is that period, for the record?

5 A. That's from November 16, 2018, through September 15, 2022.

6 Q. Okay. Do you see where it says "type"?

7 A. Yes.

8 Q. What information is there?

9 A. That states that this was a post-paid customer.

10 Q. What's a post-paid customer?

11 A. The difference between prepaid and post-paid is how the
12 customer is billed. In a post-paid circumstance, the customer
13 receives an invoice each month and then they pay for the month
14 in advance.

15 Q. Publishing for you Government Exhibit 802 in evidence. Do
16 you see 802 on your screen?

17 A. Yes, I do.

18 Q. I'll represent to you that this is, again, a PDF creation
19 of what was produced to the United States in Excel format.

20 And, by the way, does Verizon produce these types of
21 records in Excel?

22 A. Typically, yes.

23 Q. Okay. Well, first of all, what information, if you
24 recognize it, is in Government Exhibit 802?

25 A. This appears to be device information related to a

1 particular phone number.

2 Q. Okay. And what particular phone number does it appear to
3 be related to?

4 A. (954) 274-6800.

5 Q. Do you know what MIN is?

6 A. Yes. That's a mobile identifying number.

7 Q. And what is the difference between MIN, mobile identifying
8 number, and MTN, which is the mobile telephone number?

9 A. In the past -- well, actually, let's start from the
10 beginning. In relation to local number portability, each
11 carrier was provided what they call a pool of phone numbers,
12 and we associated an MIN, which is a mobile identifying
13 number, with the phone number. Phone numbers can be changed
14 at any time, but when that happens, whoever owned that phone
15 number at the time it was placed in the pools, that phone
16 number returns back to their inventory.

17 So the MIN is something that we all use in our
18 industry in order to identify that number even if it's
19 changed.

20 Q. Okay. But for purposes of identifying the telephone
21 number, it's the first column?

22 A. That's correct.

23 Q. All right. Now, based on this record, were there devices
24 that were assigned to the telephone number (954) 274-6800 when
25 this Verizon account was active?

1 A. Yes.

2 Q. Let's take a look at the bottom two rows of this sheet.

3 And you know what? I'm going to -- let's start with this

4 column. Do you see where it says "EFF_date"?

5 A. Yes.

6 Q. Do you know what that means?

7 A. Yes. That effective date of the device activated or --

8 yes, activated on that particular phone number.

9 Q. Okay. So if we look at the device in the bottom two rows,
10 what was the activation date of this device?

11 A. November 15 of 2020.

12 Q. Okay. And is there information in this spreadsheet about
13 the type of device that was assigned to the phone number
14 (954) 274-6800?

15 A. Yes.

16 Q. Okay. What column is that information in?

17 A. You can find that in both the MFG name column as well as
18 the EQP name column.

19 Q. Okay. What was the name of the device that I have
20 centered on here?

21 A. Its model number is the Note 20 Ultra 5G in copper, 128
22 gigabyte.

23 Q. And who is the manufacturer?

24 A. Samsung.

25 Q. Do you know what an IMEI is?

1 A. Yes. That's a unique identifying number for a device.

2 Q. So according to Verizon's record, this device was active
3 on its network starting -- this device being the Samsung Note
4 20 Ultra 5G in Cooper with 128 gigabytes storage was active as
5 of November 15, 2020?

6 A. Yes. I'm sorry. Did you say 15th?

7 Q. It looks like November 15th, 2020.

8 A. Yes. Thank you.

9 Q. The answer is yes?

10 A. Yes.

11 Q. Publishing Government Exhibit 800 in evidence.

12 Do you see the first page of Government Exhibit 800
13 on your screen?

14 A. Yes.

15 Q. Do you know what type of record this is?

16 A. Yes. That is the first page of a monthly billing
17 statement.

18 Q. This is a large document. I'm going to go to page 248 of
19 Government Exhibit 800, and that is Bates-stamped 3445.

20 Do you see a page on your screen with a page
21 number 3445 at the bottom?

22 A. Yes.

23 Q. What are we looking at here?

24 A. This is also the first page of a monthly billing
25 statement.

1 Q. Okay. And what is the period of the monthly billing
2 statement that we're looking at?

3 A. April 16, 2021, through May 15, 2021.

4 Q. There's a section here that says "Tracy Wade" with an
5 address. Do you see that?

6 A. Yes.

7 Q. What is this?

8 A. That's the mailing address provided by the subscriber.

9 Q. Is this where the bill was sent to?

10 A. Yes.

11 Q. There's a section that I'm enlarging on the bill. Do you
12 see what I've enlarged on your screen?

13 A. Yes.

14 Q. What do you see?

15 A. So that's a list or part of a list of all the active
16 numbers on the account at the time the bill was created.

17 Q. Okay. And do you see one of the active accounts listed?

18 A. Yes.

19 Q. I'm sorry. Do you see one of the active lines?

20 A. You can call it a line, mobile number.

21 Q. What is the mobile number that we're looking at?

22 A. (954) 274-6800.

23 Q. Is there a name associated with it?

24 A. Yes.

25 Q. What do you see?

1 A. The name provided by the account owner was Carolyn Wade.

2 Q. Let's go to page 249 of the exhibit, which is

3 Bates-stamped 3446. Do you see that page on your screen?

4 A. Yes.

5 Q. First of all, overall, what are we looking at on this
6 page? And I can make it bigger so it's easier to see.

7 A. So this is a page from the detailed call records that
8 would appear in a detailed billing statement.

9 Q. Okay. And is it call details for a particular number?

10 A. Yes.

11 Q. And what number is this call details for?

12 A. (954) 274-6800.

13 Q. Do you see that information -- do you see where it says
14 "Carolyn Wade"?

15 A. Yes.

16 Q. Is there other information there about this particular
17 line?

18 A. Yes. The device model is listed.

19 Q. So is this the device that was being used during this
20 billing statement?

21 A. Yes. At the time that the calls took place, that was the
22 device.

23 Q. There's some columns here. Let's walk through these.

24 What is in the date column?

25 A. That's the date that the phone call took place.

1 Q. What's in the time column?

2 A. The time that the call connected to the Verizon network.

3 Q. What is in the number column?

4 A. That is the number of the calling party, the person or the
5 individual that called this subscriber.

6 Q. Okay. Origination?

7 A. The location of the subscriber at the time the call took
8 place.

9 Q. And destination?

10 A. That would be -- normally, if that's an outbound phone
11 call made by the subscriber, it would show their location, but
12 instead, it shows that it was an incoming call made to the
13 subscriber.

14 Q. Let's see if we see an example of it in the other
15 direction. Do you see the other direction here?

16 A. Yes.

17 Q. So, for example, in line three?

18 A. Yes.

19 Q. What kind of call was that?

20 A. So that's an outbound phone call.

21 Q. And do you see the minute column?

22 A. Yes.

23 Q. What's that showing? What information is there --

24 A. That would be the duration of the phone call rounded up to
25 the nearest minute.

1 Q. So this phone, Note 20 Ultra 5G, was making these calls
2 during this period?

3 A. Well, okay. So that's going to be the billing period. So
4 that would indicate when we sent the records to -- or the bill
5 to the customer rather than the activity that took place
6 within that period of time.

7 Q. Well, isn't this a bill for the activity during that
8 billing statement?

9 A. My apologies. Yes. That's correct.

10 Q. So what's captured here for this bill, if there were calls
11 made during this period --

12 A. It would be within that period of activity; that's
13 correct.

14 Q. We would see it on this sheet?

15 A. That's correct.

16 Q. And it would be for this number and that phone model?

17 A. That's correct.

18 Q. Note 20 Ultra 5G?

19 A. Yes.

20 Q. Let's go to page 265 of Government 800.

21 And this page is Bates-stamped 3462. Do you see that
22 on your screen?

23 A. Yes, I do.

24 Q. What is the billing period for this portion of the
25 exhibit?

1 A. May 16, 2021, through June 15, 2021.

2 Q. During that period, May 16, 2021, through June 15, 2021,
3 was there a phone number assigned to Carolyn Wade, based on
4 this record?

5 A. Yes.

6 Q. What was it?

7 A. (954) 274-6800.

8 Q. And based on this record, what device was assigned to that
9 phone number?

10 A. A Note 20 Ultra 5G.

11 Q. I'm going to page 281 of Government Exhibit 800, which is
12 Bates-stamped 3478. Do you see that page on your screen?

13 A. Yes.

14 Q. Okay. What are we looking at here?

15 A. The first page of another monthly invoice.

16 Q. And what is the period of this monthly invoice?

17 A. Billing period June 16, 2021, through July 15, 2021.

18 Q. Okay. Was there, according to this record, a phone number
19 assigned to Carolyn Wade during that period?

20 A. Yes.

21 Q. Is it the same phone that we've been looking at?

22 A. Yes, it is.

23 Q. We're now on page Bates stamp 3480. Do you see that on
24 your screen?

25 A. Yes, I do.

1 Q. Are these calls that were coming to or from this number
2 ending in 6800?

3 A. Yes.

4 Q. And what device is being used during this period?

5 A. Note 20 Ultra 5G.

6 Q. We're now going to page 300 of Government Exhibit 800,
7 which is Bates stamp 3497. Do you see that on your screen?

8 A. Yes.

9 Q. What are we looking at?

10 A. This is page 1 from a monthly billing invoice.

11 Q. And what is the month or period of this billing invoice?

12 A. The billing period, July 16, 2021, through August 15,
13 2021.

14 Q. And was there a line assigned to Carolyn Wade during that
15 period?

16 A. Yes.

17 Q. Is it the same phone number that we have been looking at
18 ending in 6800?

19 A. Yes.

20 Q. And based on this record, what is the model of phone that
21 was assigned to that line during the period of July 16, 2021,
22 to August 15, 2021?

23 A. Note 20 Ultra 5G.

24 Q. Does it appear that that device was both making and
25 receiving calls on Verizon's network based on this record?

1 A. Yes.

2 Q. Mr. Morrow, are you familiar with the term IP address?

3 A. Yes.

4 Q. How would you describe in a nontechnical way or a way for
5 someone like me to understand what an IP address is?

6 A. Well, an IP address -- IP stands for Internet Protocol,
7 and it is the gateway through which an Internet user can enter
8 the World Wide Web.

9 Q. Do IP addresses have numbers?

10 A. Yes.

11 Q. And are they unique to that gateway or entry into the
12 Internet?

13 A. Yes.

14 Q. Does Verizon own IP addresses?

15 A. Yes.

16 Q. And do those IP addresses identify Verizon's gateways to
17 the Internet?

18 A. Yes.

19 Q. Can customers on Verizon's network that have a data plan
20 or a device that's capable of using data -- can they use
21 Verizon's gateways to the Internet?

22 A. Yes, as long as they are a paid customer.

23 Q. Does Verizon keep records of IP usage by its customers or
24 subscribers?

25 A. Yes.

1 Q. Does it retain that information for a certain period of
2 time?

3 A. For a period of time, yes.

4 Q. What is the period of time, if you know, that Verizon
5 typically keeps those records of IP usage?

6 A. I believe the retention period is no more than 60 days.

7 Q. So if a customer was using Verizon's network and accessing
8 the Internet through one of Verizon's own IP addresses three
9 years ago, would Verizon have a record of that specific usage?

10 A. Highly unlikely.

11 Q. Does Verizon keep track or have some kind of record of the
12 IP addresses that it owns?

13 A. Yes.

14 Q. I'm going to publish for you Government Exhibit 805 in
15 evidence. Do you see Government Exhibit 805 on your screen?

16 A. Yes.

17 Q. Do you recognize it?

18 A. I do.

19 Q. This appears to be a letter dated May 9, 2024; is that
20 right?

21 A. That's correct.

22 Q. And it appears it was sent by email to who?

23 A. Kelly -- and forgive me for my mispronunciation of the
24 last name --

25 Q. I'll help. It's DiPietrantonio?

1 A. That's perfect. Thank you.

2 Q. Mr. Morrow, this letter appears to be signed by Dion G.
3 Morrow. Do you see that?

4 A. I do.

5 Q. Did you prepare this letter?

6 A. Yes.

7 Q. Did you prepare this letter in connection with information
8 that the United States requested by subpoena?

9 A. Yes.

10 Q. Were you authorized to draft this letter?

11 A. Yes.

12 Q. Now, can you read the letter out loud?

13 A. Yes. I'm going to, if it's okay with you, avoid the typo.

14 Q. Okay. It happens to the best of us.

15 A. Thank you.

16 "This letter has been issued to you in order to
17 confirm that the following Internet Protocol or IP addresses
18 have been verified to have been the property of Verizon
19 Wireless. The following list of IP addresses were owned by
20 Verizon Wireless during the year 2021."

21 Q. You can read those IP addresses for the record.

22 A. 174.228.36.184, 174.228.6.224, 174.211.171.127, and
23 174.211.162.200.

24 Q. Did you verify using Verizon's records, that these were,
25 in fact, IP addresses that Verizon owned in 2021?

1 A. Yes.

2 Q. Mr. Morrow, in order to use these IP addresses that are
3 owned by Verizon Wireless, would a user have to be connected
4 to Verizon's wireless network?

5 A. Yes.

6 Q. Would there be any way to use these if you were not on
7 Verizon's network?

8 A. Not to my knowledge, no.

9 MR. SNIDER: The Government tenders the witness for
10 cross-examination.

11 CROSS-EXAMINATION

12 BY MR. MCCRAY:

13 Q. Good afternoon, Mr. Morrow.

14 A. Good afternoon, sir.

15 Q. I just have a few questions for you.

16 With respect to the IP addresses, you're not able to
17 actually tell who's actually using a device at a particular
18 time; is that correct?

19 A. That's -- the records we submitted don't show that, so
20 that's correct.

21 Q. So if Ms. A has, let's say, an iPad and it has an IP
22 address of 333 and it's used, you can't tell if Ms. A was
23 actually using that, can you?

24 A. The actual user of the device?

25 Q. Right.

1 A. No, I wouldn't be able to tell that.

2 Q. Are you familiar with the MAC address?

3 A. I have some familiarity with a MAC address, yes.

4 Q. Does that stand for media access control address?

5 A. That is my understanding.

6 Q. And normally it's a 12-digit number assigned to various
7 devices; is that correct?

8 A. I couldn't say.

9 Q. You couldn't say?

10 A. No.

11 Q. Okay. You would agree that a MAC address has what is
12 called unique identifying numbers; is that right?

13 A. That is my understanding; that's correct.

14 Q. It's like a car. No car, at least, is supposed to have a
15 duplicate VIN number; is that correct?

16 A. Yes. Well, that would be the case if, in fact, that's how
17 MAC addresses work.

18 Q. And I believe it was Exhibit 805 that was just posted.
19 There were five IP addresses; is that correct?

20 A. I'm going to actually correct on that one. I see four IP
21 addresses.

22 Q. You're right. Four.

23 Okay. And those numbers just confirm that they come
24 under Verizon; is that correct?

25 A. That's correct.

1 Q. Okay. Are you able to discern who the owners of those
2 devices are?

3 A. Devices that were used on those IP addresses?

4 Q. Yes. Yes.

5 A. Well, we know from the records which device was used
6 during that period of time.

7 Q. Okay.

8 A. So I would answer your question yes.

9 MR. MCCRAY: I beg the Court's indulgence. Just one
10 second. I don't have any further questions, Judge, of this
11 witness. Thank you.

12 MR. SNIDER: No redirect, Your Honor.

13 THE COURT: Permanent excusal?

14 MR. SNIDER: Yes, Your Honor.

15 MR. MCCRAY: Yes.

16 THE COURT: You may step down. You are excused.

17 THE WITNESS: Thank you.

18 MR. SNIDER: The United States calls Lindsey Bergh.
19 (Government witness, LINDSEY BERGH, duly sworn.)

20 COURT CLERK: Please be seated. If you can state and
21 spell your name for the record.

22 THE WITNESS: My name is Lindsey Bergh,
23 L-I-N-D-S-E-Y, B-E-R-G-H.

24 DIRECT EXAMINATION

25 ///

1 BY MR. SNIDER:

2 Q. Good afternoon, Ms. Bergh.

3 A. Good afternoon.

4 Q. How are you?

5 A. I'm good. How are you?

6 Q. Good.

7 Can you tell the jury where you work?

8 A. Yes. I work at Persona Identities.

9 Q. What is Persona Identities?

10 A. Persona Identities is a software company that provides
11 identity verification services to our customers in order for
12 them to verify their end users.

13 Q. And how long have you been at Persona?

14 A. I've been at Persona for about three years and three
15 months, since January of 2021.

16 Q. What's your current position?

17 A. I am the head of customer success at Persona, which means
18 I work with our customers and help them to implement and use
19 our software.

20 Q. And have you had that position for all three years and
21 three months?

22 A. I have been the head of customer success for a few months
23 now. Prior to that, I was a manager on the customer success
24 team, and for the first year and a half of my time at Persona
25 I was a customer success manager, which meant I worked

1 directly with our customers.

2 Q. And in working with Persona's customers, did you become
3 familiar with Persona's product or platform?

4 A. Yes, I did. I work directly with our customers and
5 recommend to them what types of products they should use and
6 how they should utilize them in order to verify their end
7 users. I'm familiar with the different products across our
8 platform.

9 Q. And are you here today representing Persona?

10 A. Yes, I am.

11 Q. Are you also familiar through your work with Persona's
12 customers?

13 A. Yes. I work very closely/directly with a lot of our
14 customers and am familiar with them in their use cases with
15 us.

16 Q. You said use case?

17 A. Yes --

18 Q. What's a use case?

19 A. A use case is a specific purpose for which one of our
20 customers might use our software, again, to verify their end
21 users.

22 Q. And what kind of customers does Persona have?

23 A. We work with a number of different types of customers
24 across different industries and verticals. We work with
25 financial services companies who might offer things like

1 credit or debit cards to their end users. We work with gig
2 economy delivery companies, like Doordash or Instacart, who
3 might hire workers for the purposes of delivering goods.

4 Q. And for all those customers, Persona is providing a type
5 of identity verification service?

6 A. Yes, that's correct. Each customer can choose what type
7 of verification they would like to use. Examples can be
8 things like requesting a government ID or looking up an end
9 user's Social Security number to confirm that they are who
10 they say they are.

11 Q. And does Persona keep records in connection with its
12 service of verifying identity?

13 A. Yes, we do. We keep records so that our customers can use
14 them if they need them, and those are available for as long as
15 our customers need them.

16 Q. And are you familiar with those types of records that
17 Persona keeps?

18 A. Yes, I am.

19 Q. Have you ever heard of a company named Womply?

20 A. Yes, I have. Womply was one of our customers.

21 Q. And was Womply a customer during a particular time?

22 A. We started working with Womply, I believe, around 2021 for
23 the purpose of verifying their end users prior to them taking
24 out PPP loans during COVID.

25 Q. So Womply was one of Persona's customers?

1 A. That's correct.

2 Q. And was that the service that it was using to verify
3 identities of users during the PPP program?

4 A. Yes, that's correct. Womply had a contract with Persona
5 to help verify applicants who were applying for PPP loans
6 through Womply. They used us to verify those users'
7 identities.

8 Q. Now, was Persona's service -- was it web-based or --
9 explain how the service sort of was rolled out to customers.

10 A. Yeah. Different customers can choose to integrate with
11 Persona on different types of devices. So they can request
12 that end users submit information like a government ID either
13 on a desktop or on a mobile device. They essentially send out
14 a link to those end users who then go through the process of
15 filling out that information.

16 Q. And are you familiar with the term SDK?

17 A. Yes. An SDK is a software development kit. That's
18 another way that customers can integrate Persona's software
19 within their own mobile app.

20 Q. And is that how Womply used Persona's services? Was it
21 embodied in the Womply website?

22 A. Womply used our embedded -- our embedded flow, which
23 essentially means they're using our web SDK and integrating
24 that directly within their website's flow.

25 Q. Now, were there different levels of identity verification

1 that a customer could choose?

2 A. Yes. Each of Persona's customers can decide what types of
3 verifications, something like a government ID or a selfie
4 verification, they would like to use in order to verify their
5 end users. So which types of verifications the customer uses
6 is up to the customer, and Persona will then help them put
7 together that set of requirements.

8 Q. Do you know what kind of requirements or preferences
9 Womply was using?

10 A. Yes. Womply requested that its end users submit their
11 information, including things like name, date of birth,
12 address, Social Security number, in what's called a database
13 verification so that they could determine if there was
14 actually an individual who possessed all of that information
15 and that it matched an identity record.

16 The second requirement they had was to collect a
17 government ID. So a user had to submit a valid form of
18 government ID, whether that's a driver's license or a
19 passport. Next, they had to submit an image of their face --
20 a selfie so that we can determine if the person in the selfie
21 matches the person on the gov ID.

22 And then, last, if they pass all of those
23 requirements, we would check them against sanctions lists,
24 including OFAC, to make sure that they're not on any
25 US Government lists that prohibit them from transacting with

1 our customer.

2 Q. And did Persona keep records of Womply's inquiries that
3 were being done for PPP applicants?

4 A. Yes, we did. So each time an applicant applied for a loan
5 through Womply, they would be -- surfaced what we call an
6 inquiry, which essentially is a single instance of a user
7 trying to verify their identity, and we kept a record of all
8 of those attempts for Womply to use if they needed.

9 Q. Ms. Bergh, we're going to go through some government
10 exhibits that have been admitted into evidence in this case,
11 and the first one I'm going to start with is Government
12 Exhibit 114. Do you see Government Exhibit 114 on your
13 screen?

14 A. I do.

15 Q. Do you recognize it?

16 A. Yes. This is an inquiry record exported from the Persona
17 dashboard.

18 Q. Okay. Does the inquiry record have a unique number?

19 A. It does.

20 Q. What does it end with?

21 A. This ends in EKB.

22 Q. And what other information is on the first page of
23 Government Exhibit 114?

24 A. This includes name, date of birth, address, government ID
25 number, phone number, and email address.

1 Q. And do you know where that information would have come
2 from to be in Persona's record?

3 A. Yes. This was the information that the user submitted via
4 a form when they were going through the inquiry in Persona.

5 Q. Okay. And I'll just note here at the top right it
6 indicates -- it says "failed," in pink --

7 A. Yes.

8 Q. -- and there's a date. Do you see that?

9 A. Yes, I do.

10 Q. Do you have an understanding of what that means?

11 A. Yes. So the date, May 13th, 2021, is the date on which
12 this inquiry was created -- so the date the user tried to go
13 through this flow of verifying their identity. And failed is
14 the status of the inquiry. This indicates that the user was
15 not successful in verifying themselves.

16 Q. Okay. And does Persona keep a record of why an inquiry
17 may have failed?

18 A. Yes, we do.

19 Q. So let's go through this inquiry ending in EKB. We're on
20 page 2 now, which has a Bates stamp of 2886. Do you see that?

21 A. Yes, I do.

22 Q. What's on page 2?

23 A. This includes the identification class, which is the type
24 of government ID. These are submitted. In this case, it's
25 DL, which means they submitted a driver's license. It also

1 includes the country code that the user submitted an ID from.
2 So they submitted a US driver's license. And then the third
3 piece is the Social Security number. That's the Social
4 Security number that the user submitted on the form when they
5 were going through this flow.

6 Q. Okay. Do you want to just read that number for the
7 record, the Social Security?

8 A. Yes. It is 592-09-0026.

9 Q. We're now going to move to page 3 of Government
10 Exhibit 114. What's on page 3?

11 A. Page 3 includes images of the government ID that the user
12 attempted -- or that the user submitted as they were going
13 through the flow. There are four sets of them, which
14 indicates the user tried four times to submit their government
15 ID.

16 THE COURT: Excuse me. We have a request to take a
17 short break. One of our jurors would like to use the
18 facilities. So we're going to be in recess, and let us know
19 when you're ready to proceed.

20 (Jury exited at 2:26 PM.)

21 THE COURT: There is one matter I would like to
22 address with Ms. Wade. The Supreme Court requires judges to
23 make certain inquiries about matters. One has to do with any
24 offers that the government may have made.

25 I do not wish to know the terms of any offer, simply

1 whether an offer was made. If yes, was it communicated by
2 counsel to Ms. Wade. And if not, the answer would be no, and
3 that would resolve the inquiry.

4 MR. SNIDER: The United States made a plea offer to
5 the defendant through her counsel of record.

6 THE COURT: All right. And was that communicated to
7 Ms. Wade?

8 MR. MCCRAY: Yes, sir, it was.

9 THE COURT: All right. And the next issue is whether
10 or not counsel discussed with Ms. Wade any guidelines in this
11 case.

12 MR. MCCRAY: Yes, Judge.

13 THE COURT: All right. Now, I don't want to
14 communicate in any way that I have any ideas about the case.
15 This is simply an inquiry that the Court has to conduct. So I
16 want to make sure we're all clear on that.

17 THE DEFENDANT: I understand, Your Honor.

18 THE COURT: Thank you. We are in recess.

19 (Recess at 2:28 PM.)

20 (Jury enters at 2:42 PM.)

21 THE COURT: Be seated. Please continue.

22 MR. SNIDER: Thank you. Your Honor.

23 BY MR. SNIDER:

24 Q. Ms. Bergh, before the break we were on page 3 of
25 Government Exhibit 114. Do you still have that on your

1 screen?

2 A. Yes, I do.

3 Q. Okay. Let's pick up where we left off. What is displayed
4 on page 3, which is Bates-stamped 2887?

5 A. On page 3, there are images of the government ID that the
6 user going through the flow submitted their four sets of front
7 and back images, which means the user tried to submit their
8 gov ID four times.

9 Q. And in the section where it says "selfies"?

10 A. Yes. The selfie section contains an image of the portrait
11 from the government ID that was submitted.

12 Q. Okay. These pictures are submitted by the individual who
13 is -- well, did these get uploaded to Womply's website?

14 A. Yes, they were submitted directly by the user who was
15 going through the flow itself.

16 Q. We're now on page 4 of Government Exhibit 114. What's on
17 page 4?

18 A. Page 4 includes a summary of the verifications that the
19 user went through or that they completed. It indicates that
20 they submitted a database verification. A database
21 verification is when the user submits their name, date of
22 birth, address, Social Security number. We then check that
23 information against a series of authoritative databases,
24 things like credit headers and voting records and things like
25 that.

1 The green check indicates that the user passed the
2 database verification. So the information that they submitted
3 matched an identity record in a database.

4 Q. So is that what I've enlarged here as sort of the first
5 part of the identity check?

6 A. That is correct, yes.

7 Q. And this was also assigned a unique number?

8 A. Yes. It's called a verification token, and it's a random
9 set of letters and numbers that we provide when a user goes
10 through a verification. It's unique and randomly generated.

11 Q. Okay. And then the second part of this, what's indicated
12 in the part I've just enlarged?

13 A. This is a summary of a selfie verification. So when the
14 user submitted an image of their face and the green check
15 indicates that they also passed the selfie verification, it
16 also includes a randomly generated verification token.

17 Q. Okay. And then what are we looking at in the section I've
18 just enlarged here?

19 A. This indicates that the user submitted a government ID
20 four times. That represents four instances of them trying to
21 verify their gov ID. Each of those four failed and each of
22 them were also assigned a random verification token.

23 Q. Okay. And if we keep going through this exhibit, might
24 there be information as to why each one of these verification
25 attempts was not successful?

1 A. Yes, that's correct.

2 Q. Okay. And then there's a part of on this page which says
3 "session seven." Do you know what that means?

4 A. Yes. A session is a single instance of a user interacting
5 with the Persona flow. So that means basically they were
6 looking at a screen or doing something with that screen. Each
7 time that they do so, there's a session generated, and this
8 means there were seven separate sessions within this inquiry.

9 Q. Let's go to the next page, page 5, Bates-stamped 2889. Do
10 you see that?

11 A. I do.

12 Q. And is this information about the database verification
13 component of the identity check?

14 A. Yes. That's correct.

15 Q. All right. And what do we have here?

16 A. Yes. This indicates under the attributes section that
17 these are the pieces of information that the user submitted
18 when they were going through the flow. So they submitted
19 name, date of birth, address, Social Security number -- that's
20 the ID number piece -- their phone number, and their email
21 address.

22 At the bottom, the section that says "required
23 checks," that indicates all of the different checks that the
24 user had to pass as part of this database verification. So
25 there had to be a match on name, date of birth, address, and

1 Social Security number. And there had to be no record that
2 the user was deceased. That's what the alive check means.
3 There's also --

4 Q. Sorry. Go ahead. Finish.

5 A. And then, lastly, there's a check for P0 box. Because
6 that's not under the required check section, that means the
7 user did not have to pass the P0 box check. It's okay if they
8 submitted a P0 box for their address.

9 Q. During this part of the verification -- are these
10 attributes actually checked against some database?

11 A. Yes. That's correct. A database verification involves us
12 checking the information that the user submits against a
13 series of authoritative sources. That can be things like
14 credit history or voting records or Telco records.

15 Q. And this section of the verification was successful?

16 A. That's correct.

17 Q. Now I'm on page 6. What information is on page 6 of this
18 report?

19 A. Page 6 includes information on the selfie verification
20 that the user submitted. So this includes the center, left,
21 and right selfie poses that they provided. And then on the
22 bottom section, under required checks, those are all the
23 different verification checks that the user was required to
24 pass and did pass as part of this verification.

25 Q. Okay. I see green check marks everywhere except glasses.

1 Do you see that?

2 A. Yes.

3 Q. And there's, like, a little red circle with a line through
4 it. What does that mean?

5 A. That means that the user failed the glasses check. So we
6 detected that they were wearing a pair of glasses, but because
7 that was not a required check, the user still passed their
8 selfie.

9 Q. Now we're going to page 7, which is Bates-stamped 2891.
10 Do you see that page?

11 A. Yes.

12 Q. What information is on page 7?

13 A. Page 7 includes the government ID that the user submitted
14 as part of their gov ID verification. It includes in the
15 attributes section the information that we were able to
16 extract or automatically detect from the image. Because it
17 was a little bit blurry, we were only able to detect the issue
18 date and not things like the name and the date of birth and
19 the ID number.

20 Q. And is this the image, this blur you're referring to?

21 A. That's correct.

22 Q. Now we're on page 8, Bates stamp 2892. Do you see that?

23 A. Yes.

24 Q. What information is on page 8?

25 A. Page 8 includes the checks that the user was required to

1 pass in order to pass this government ID verification.

2 Q. And did this government verification pass or fail?

3 A. It failed, which is indicated in the upper right-hand
4 corner.

5 Q. And are there reasons why?

6 A. Yes.

7 Q. What are those reasons?

8 A. This failed because several of the required checks
9 failed -- barcode, which means we weren't able to decode the
10 information in the barcode on the back of the ID, as well as
11 selfie to ID comparison, which means we weren't able to
12 properly compare the portrait on the ID against the selfie
13 that was submitted previously.

14 The other two checks that failed, government ID and
15 allowed ID type, means we couldn't actually detect it was a
16 proper government ID or the type the user selected. And
17 again, that's because it was a fairly blurry image.

18 Q. Okay. And if this component of the verification was not
19 successful, did Womply, through Persona, allow there to be a
20 second try?

21 A. Yes. There were four attempts permitted on this flow.

22 Q. Okay. So on page 8, the token ends in FX9F; is that
23 correct?

24 A. Yes.

25 Q. Now we're on page 9. It looks like there's a new token.

1 Do you see that?

2 A. Yes.

3 Q. And what's on page 9?

4 A. Page 9 is another gov ID attempt that the user submitted.
5 This time we were able to extract more information off the ID,
6 so we were able to properly detect the name and the address
7 and the birth date, the issue date, and the expiration date.

8 Q. Now I'm on page 10. It looks like the token is the same,
9 and there's some information on page 10. What do you see on
10 page 10?

11 A. Page 10 indicates that the government ID still failed, and
12 the reason it failed is because one of the required checks --
13 barcode detection -- still failed, which means we weren't able
14 to properly decode the barcode on the back of the ID.

15 Q. Now I'm on page 11. What's on page 11? It looks like a
16 new token; is that right?

17 A. That's correct.

18 Q. Talk to us about this attempt.

19 A. This is the third gov ID attempt that the user submitted.
20 This also failed, as indicated in the upper right-hand corner.
21 In this instance, we were able to extract all of the fields
22 off of the ID. So we got the name and the date of birth,
23 address, ID number, issue date, expiration date.

24 Q. Okay. Now I'm moving to page 12, Bates-stamped 2896. Do
25 you see that?

1 A. Yes.

2 Q. And does this page have the reason why the third attempt
3 failed?

4 A. This attempt also failed because we were still not able to
5 decode the information in the barcode.

6 Q. Okay. I'm moving to page 13, Bates-stamped 2897. Do you
7 see that?

8 A. Yes, I do.

9 Q. Is this the fourth attempt?

10 A. Yes, it is.

11 Q. And the information in the fourth attempt, did this
12 attempt pass or fail?

13 A. This fourth attempt also failed.

14 Q. Moving to page 14, does this have the reason why the
15 fourth attempt failed?

16 A. Yes. The fourth attempt also failed because we were
17 unable to decode the barcode on the back of the driver's
18 license.

19 Q. Okay. Now, what happens after four failed attempts to
20 verify the gov ID?

21 A. After four failed attempts, the user is not permitted to
22 try anymore. They failed their overall inquiry and they see a
23 screen telling them that they failed.

24 Q. Would a user be able to start another inquiry?

25 A. Yes. The user could go through another second inquiry if

1 the customer allowed them to, which in this case they did.

2 Q. Womply allowed a second try of the whole thing again?

3 A. That's correct.

4 Q. And the second inquiry, you would have to do the selfie
5 and all that again?

6 A. You have to start over again, from the beginning, yes.

7 Q. Now, I'm on page 15, still, of Government 114. Do you see
8 that?

9 A. Yes, I do.

10 Q. Now, you talked to us a little bit ago about sessions?

11 A. Yes.

12 Q. Does this page have some information about those sessions
13 that you were testifying about?

14 A. Yes, it does.

15 Q. Okay. And I'm going to scroll through them so you can
16 just see. This is page 15, 16, 17, 18, 19. There were seven
17 sessions; is that right?

18 A. That's correct.

19 Q. In the course of responding to the government's subpoena
20 to Persona, did Persona provide additional detail about each
21 session?

22 A. Yes, we did.

23 Q. I'm going to publish for you Government Exhibit 114.1. Do
24 you recognize 114.1?

25 A. Yes.

1 Q. And what is this?

2 A. This is a screenshot from the Persona dashboard that our
3 customers can log into to view information about a user's
4 inquiry. And this specifically is showing information about
5 the sessions that were included in this inquiry.

6 Q. Okay. So I'm going to enlarge the first part of this. Do
7 you see the information that I've enlarged?

8 A. I do.

9 Q. And is there a date and time for the first session?

10 A. Yes. This took place on May 13, 2021, starting at 1:23 PM
11 UTC.

12 Q. Okay. And what's the information above that?

13 A. Above that is the device that the session was carried out
14 on, in this case a Windows desktop on a Chrome browser.

15 Q. Okay. And then I see sessions two through seven kind of
16 grouped together below that. Do you see that?

17 A. Yes.

18 Q. What can you tell us about sessions two through seven just
19 looking at what I've enlarged on the screen?

20 A. Yeah. This indicates that sessions two through seven were
21 on an Android device, on Chrome Mobile, and they were all
22 started at different time stamps ranging from 2:09 PM UTC to
23 2:26 PM UTC as the final.

24 Q. Okay. Let's go to page two of Government Exhibit 114.1.
25 What information is displayed on Government Exhibit

1 114.1, page two, in the section that I've enlarged?

2 A. Yes. This includes information about the network and the
3 device that this session was carried out on.

4 Q. Okay. Do you know what an IP address is?

5 A. Yes. An IP address is an Internet Protocol, and it
6 indicates where the device was connecting to the Internet
7 from.

8 Q. And the IP address for this session ended in 166?

9 A. Correct.

10 Q. And that's information that Persona captured during this
11 inquiry?

12 A. That's correct.

13 Q. And I see here it says "Network country, region, latitude,
14 and longitude."

15 How is Persona getting that information?

16 A. These are all inferred from the IP address. So we have
17 the IP address directly from the user's device and Internet
18 connection, and we then infer the country, region, longitude,
19 and latitude from the IP address.

20 Q. So when you say infer, is Persona -- what do you mean by
21 that?

22 A. By that I mean we don't have, say, GPS access from the
23 user's device. And so we use the IP address and use an
24 underlying vendor to determine where the device might be
25 coming from based on that IP address.

1 Q. But is it necessarily a precise location?

2 A. It's not always, no.

3 Q. It's just picking up where the network connection was?

4 A. That's correct.

5 Q. Now, in the section where it says "device details," do you
6 see that?

7 A. Yes.

8 Q. What information is in this section?

9 A. This includes information about the type of device that
10 the user was using when they went through this particular
11 session. So they were on a desktop, specifically a
12 Windows 10, and they were on a Chrome browser.

13 Q. Okay. And that's information that Persona collects during
14 the inquiry?

15 A. That's correct.

16 Q. Now we're moving on to session two, the information for
17 which is on page 3722 and carried over to 3723. Do you see
18 that?

19 A. Yes.

20 Q. Okay. What is the information that Persona captured
21 regarding session two?

22 A. In session two, the user was on an IP address ending in
23 184. We inferred this location in longitude and latitude from
24 the IP address. And then in the device section, this
25 indicates that the second session was on an Android device as

1 opposed to a desktop.

2 Q. Where it says "device type," can you read those letters
3 and numbers?

4 A. Yes. It is SM-N986U.

5 Q. Do you have an understanding of what information is
6 captured there?

7 A. That is the specific type of Android device that was used.

8 Q. Okay. And it says "tablet." Is that something again
9 that's being inferred by Persona or they know that was a
10 tablet?

11 A. Tablet, I think, can be interchangeable with like a mobile
12 device --

13 Q. Okay.

14 A. -- for Android. So basically it just means they were on a
15 handheld Android device.

16 Q. A handheld Android device, okay.

17 And, again, this network region here, this is just
18 based on the IP address?

19 A. Yes, that's correct.

20 Q. So if the Internet gateway was located in New York but a
21 person was not in New York using that gateway because they
22 were connected to a network, it would still show New York even
23 if the person wasn't in New York?

24 A. That's correct. It's not a GPS connection, essentially.

25 Q. Okay. Let's talk about session three. Is there

1 information for session three?

2 A. Yes.

3 Q. And what information did you collect from session three?

4 A. Session three includes an IP address ending in 184 and the
5 same type of Android device as in session two.

6 Q. What information do you see captured from session four?

7 A. Session four also includes an IP address ending in 184 and
8 an Android device. Again, this session took place on a Chrome
9 browser.

10 Q. Is it the same device type that we're seeing in all these
11 sessions?

12 A. That's correct. Yes -- not for session one -- session
13 two, three, and four.

14 Q. Thank you.

15 How about session five?

16 A. Session five is also on an IP address ending in 184 and
17 also on an Android device.

18 Q. The same device that we looked at in session four?

19 A. Correct.

20 Q. Where am I -- on session six? What about session six?
21 What information was captured from that session?

22 A. Session six was also on an IP address ending in 184 and
23 also on the same Android device as the prior session.

24 Q. And lastly, session seven.

25 A. Session seven was also on an IP address ending in 184 and

1 the same Android device as sessions two through six.

2 Q. In these sessions, did some of these correspond to these
3 different failures and attempts we had looked at a few minutes
4 ago?

5 A. That's correct.

6 Q. All of which was in this one inquiry that is reported in
7 Government Exhibit 114?

8 A. That's right.

9 Q. Let's take a look at Government Exhibit 115 -- published
10 Government Exhibit 115. Do you see it on your screen?

11 A. Yes.

12 Q. Do you recognize this document?

13 A. Yes.

14 Q. And what is this?

15 A. This is another record of an inquiry from Persona. This
16 one was approved as indicated in the upper right-hand corner.

17 Q. So is this that second overall attempt?

18 A. That's correct.

19 Q. It has a different inquiry number than we looked at in
20 Government Exhibit 114?

21 A. Yes.

22 Q. All right. Now we're on page 2 of Government 115. And
23 what's on page 2?

24 A. Page 2 includes the type of government ID that was
25 submitted under the identification class. So, again, DL,

1 indicating a driver's license. The country that the
2 government ID was from, so US. And the Social Security number
3 that was submitted during the inquiry.

4 Q. Let's go to -- we're on page three. This is just more
5 information from that inquiry?

6 A. Yes. Under selfies is the portrait from the government ID
7 that was submitted.

8 Q. Would the documents, that driver's license, have to have
9 been reuploaded during a new inquiry?

10 A. Yes, they would have.

11 Q. Now we're on page 4, which ends in Bates 3078. Do you see
12 that?

13 A. Yes.

14 Q. Okay. Talk to us about what's on this page.

15 A. This indicates that the inquiry was approved. That's in
16 the upper right-hand corner. It also shows the verifications
17 that the user went through as a part of this inquiry. So a
18 database verification that passed, a selfie verification that
19 passed, one government ID verification that failed followed by
20 one that passed.

21 On the right-hand side under reports is a watch list
22 report that we ran to make sure the user wasn't on any
23 sanctions lists. And at the bottom it indicates that there
24 was one session associated with this inquiry.

25 Q. So all of this was done -- these checks for this inquiry

1 were done in one session as opposed to seven?

2 A. That's correct.

3 Q. And it took two attempts to verify the government ID in
4 this inquiry?

5 A. Yes.

6 Q. We're now on page 5. What do we see on page 5?

7 A. Page 5 includes the information that the user filled out
8 for their database verification as well as all of the checks
9 that passed.

10 Q. And this is for which person again?

11 A. Sorry?

12 Q. Which person is this for, this identity verification?

13 A. Carolyn Wade.

14 Q. And we're now on page 6 of Government 115. What's on
15 page 6?

16 A. Page 6 includes the selfie verification that the user
17 submitted -- so their center, left, and right poses, and all
18 of the checks that passed, resulting in this selfie
19 verification itself passing.

20 Q. And these are new selfies that had to be taken?

21 A. That's correct.

22 Q. Now we're on page 7. What do we see here?

23 A. Page 7 includes the government ID verification attempt.
24 This one failed. And it includes the front and back image of
25 the gov ID as well as the information that we were able to

1 extract from the ID.

2 Q. And are these new pictures that were uploaded in
3 connection with this second inquiry?

4 A. Yes.

5 Q. Okay. On page 8, what do we see here?

6 A. Page 8 includes the fact that the gov ID verification
7 failed, in the upper right-hand corner, as well as the
8 required checks that failed, specifically extractioning
9 inconsistency, which means the information extracted from the
10 front of the ID didn't match the back of the ID because it was
11 blurry. And selfie-to-ID comparison means we couldn't
12 properly compare the portrait on the ID to the selfie also
13 because it was a little blurry.

14 Q. And did Womply through Persona allow another attempt of
15 the verification of the government ID in this inquiry?

16 A. They did, yes.

17 Q. Is that what we have on page 9?

18 A. It is.

19 Q. Now we're on page 10 of Government 115. And what is
20 displayed on page 10?

21 A. This indicates that the user passed the gov ID
22 verification because they passed all of the required checks.

23 Q. So the government ID was finally verified in this check --

24 A. That's right.

25 Q. -- this attempt.

1 Now, we're on page 11. Was this also part of the
2 inquiry?

3 A. Yes, it was.

4 Q. And what happened here and what's displayed on page 11?

5 A. This is the result of a watch list report. This means
6 that we took the name and the date of birth on the screen here
7 and checked that information against any sanctions lists, and
8 the green checks indicates that there were no matches against
9 sanctions lists, so this report passed.

10 Q. Now, on page 12 there's some more information about the
11 one session that was done in connection with this inquiry; is
12 that right?

13 A. That's right.

14 Q. And much like the inquiry that was in Government
15 Exhibit 114 that had seven sessions, did Persona produce to
16 the United States, pursuant to subpoena, additional
17 information related to the session associated with the inquiry
18 in Government Exhibit 115?

19 A. Yes, we did.

20 Q. Publishing Government Exhibit 115.1. Do you recognize
21 Government Exhibit 115.1?

22 A. I do, yes.

23 Q. Can you tell us what this is?

24 A. This is a screenshot from the Persona dashboard, again,
25 specifically the sessions.

1 Q. And is this the session for the inquiry that we looked at
2 in Government 115?

3 A. Yes, it is.

4 Q. And what information was captured from the session -- the
5 one session related to the inquiry in Government Exhibit 115?

6 A. In this session, we, again, have an IP address ending in
7 184 and the fact that it was carried out on an Android device.

8 Q. And the device type SM-N986U, that was the one that we had
9 looked at from the previous inquiry?

10 A. That's correct.

11 Q. So ultimately was the identity verification through all
12 these steps for Carolyn Wade successful?

13 A. It was, yes.

14 Q. And at that point, was Persona's role in the PPP
15 application process for Womply complete?

16 A. Yes, it was.

17 MR. SNIDER: The Government tenders the witness for
18 cross-examination.

19 CROSS-EXAMINATION

20 BY MR. MCCRAY:

21 Q. Good afternoon.

22 A. Good afternoon.

23 Q. I have a couple of questions for you.

24 With respect to the various sessions for failed ID,
25 there was no indication of fraud from the standpoint of your

1 company; is that correct?

2 A. Can you explain what you mean by fraud?

3 Q. Yeah. I mean, basically the reasons that you-all gave for
4 Ms. Wade failing one time was because of glare, the other time
5 it was a barcode; am I correct?

6 A. That's correct. They were mostly poor images.

7 Q. Yes.

8 And those deficiencies were corrected; is that
9 correct?

10 A. That is correct, by the final gov ID attempt.

11 Q. She passed; is that correct?

12 A. Yes.

13 Q. And I believe you indicated that using the longitude and
14 latitude, that's not really precise; is that correct?

15 A. It is inferred from the IP address, which is not as
16 precise as a GPS connection, no.

17 Q. And so that I'm clear, looking at the various exhibits
18 that were displayed, the date May 13, 2021, that was the date
19 that showed on almost each one of those documents regarding
20 the sessions; is that correct?

21 A. That's correct.

22 Q. Is that the date that Ms. Wade was attempting to take the
23 photographs as required by Persona?

24 A. That's correct.

25 Q. Okay. So that would have been about 15 days before the

1 28th -- is that correct? -- of May? The 13th -- the 28th?

2 A. Yeah, I think that's correct.

3 Q. And there was no evidence or indicia of any ID image
4 tampering; is that correct?

5 A. Not from what I can tell from those images, no.

6 Q. And that was one of the disqualifiers as listed on the
7 documents that were displayed here today; is that correct?

8 A. Sorry. Can you explain the question?

9 Q. No. I'm saying the documents that were displayed -- the
10 exhibits that were displayed just moments ago, you had a
11 litany of, I guess, disqualifiers that caused someone to fail.

12 A. Correct.

13 Q. ID image tampering was one of them; is that correct?

14 A. That's correct, ID image tampering.

15 Q. And that was not the reasons of failing in this case; is
16 that correct?

17 A. It did not fail that check, specifically. It means that
18 we were able to detect metadata of a PDF editor being used to
19 submit the image.

20 MR. MCCRAY: I beg the Court's indulgence.

21 I have nothing further, Judge. Thank you.

22 MR. SNIDER: No redirect, Your Honor.

23 THE COURT: Permanent excusal?

24 MR. SNIDER: Yes, Your Honor.

25 MR. MCCRAY: Yes, Judge.

1 THE COURT: You may be excused. Please step down.

2 MR. ZACCA: Your Honor, the Government calls Meghan
3 Musil.

4 (Government witness, MEGHAN MUSIL, duly sworn.)

5 COURT CLERK: Please state your name and spell it for
6 the record.

7 THE WITNESS: My name is Meghan Musil, spelled
8 M-E-G-H-A-N. M-U-S-I-L.

9 DIRECT EXAMINATION

10 BY MR. ZACCA:

11 Q. Good afternoon.

12 A. Hello.

13 Q. You just introduced yourself to the jury. What do you do
14 for a living?

15 A. I am a senior Paycheck Protection Program processor.

16 Q. And for what company?

17 A. Harvest Small Business Finance.

18 Q. Where is Harvest Small Business Finance located?

19 A. In California.

20 Q. So did you come in from California?

21 A. I did.

22 Q. All right. When did you start working for Harvest?

23 A. I started working for Harvest in January of 2021.

24 Q. Can you describe to this jury the duties and
25 responsibilities you have as a PPP or a Paycheck Protection

1 Program loan processor?

2 A. We process borrowers' applications and submit them to the
3 SBA for final approval. We're basically a liaison for the SBA
4 and the borrower.

5 Q. Are you familiar with Harvest business records?

6 A. I am.

7 Q. Are you familiar with the documentation that goes along
8 with the Paycheck Protection Program loan?

9 A. Yes.

10 Q. Now, is Harvest a bank?

11 A. No, we're not.

12 Q. Does Harvest have a bank account from which it lends money
13 from?

14 A. Yes.

15 Q. Is that East West Bank in California?

16 A. It is.

17 Q. So all funding from Harvest comes from California?

18 A. Yes.

19 Q. It's been spoken about before in front of this jury, but
20 what does SBA stand for?

21 A. Small Business Administration.

22 Q. Are you, like, familiar with a company called Womply?

23 A. Yes.

24 Q. What is the relationship between the company called Womply
25 and Harvest?

1 A. So Womply is a platform that Harvest partnered with. They
2 would accept borrower applications and verify the customers.

3 Q. And once they do that, they get all that information,
4 where does it go as it relates to Harvest?

5 A. All the information coming through Womply, we would then
6 receive the application in audit forms from Womply and then we
7 would submit to the SBA.

8 Q. And once it gets to the SBA, if the SBA issues a loan
9 number, what does that mean?

10 A. That the -- they were approved for a loan.

11 Q. So that's how Harvest knows that a particular borrower has
12 been approved for a Paycheck Protection Program loan once it
13 gets that SBA number?

14 A. Yes.

15 Q. Now, in May of 2021, was there a period of time where
16 Harvest was unable to directly fund Paycheck Protection
17 Program loans?

18 A. Yes.

19 Q. Can you explain to the jury why?

20 A. Well, the program was closed to larger lenders and
21 restricted only to the smaller lenders.

22 Q. Is Lendistry a smaller lender?

23 A. It is.

24 Q. Are you familiar with that lender?

25 A. Yes.

1 Q. And is Harvest, by comparison, a larger lender?

2 A. Yes, it is.

3 Q. At that time, since Harvest, being a larger lender, was
4 unable to directly fund loans, did Harvest begin purchasing
5 Paycheck Protection Program notes or loans that were approved
6 by the SBA?

7 A. Yes, we acquired unfunded loans -- promissory notes from
8 Lendistry.

9 Q. I am showing you what's already entered into evidence,
10 Government Exhibit 117. Have you seen this document before?

11 A. I have.

12 Q. Okay. I'm going to go to page 9.

13 And for the record, we're looking at page 9,
14 Bates-stamped 2958.

15 Is this the note that accompanies this particular
16 loan on Government Exhibit 117?

17 A. Yes.

18 Q. Okay. Can you tell the jury what the loan number is?

19 A. It's 6697269001.

20 Q. I'll make it bigger for you.

21 What is the loan amount?

22 A. \$20,833.

23 Q. And who is the loan name?

24 A. Carolyn Wade.

25 Q. The date of the loan?

1 A. 5/28/2021.

2 Q. Now, it says "Lendistry" as the lender here. Despite
3 saying Lendistry, did Harvest actually fund this loan?

4 A. Yes.

5 Q. Is this an example of the loan or the type of loan that
6 was unfunded after being approved by the SBA but bought from
7 Lendistry by Harvest?

8 A. Yes.

9 Q. I'm going to go to page 21 of Government Exhibit 117 --
10 actually, 22, Bates stamp 2971.

11 Are there instructions here to the borrower on who to
12 contact?

13 A. Yes.

14 Q. Can you tell the jury what it reads here -- as to what it
15 reads here highlighted in yellow?

16 A. How to contact Harvest Small Business Finance LLC.

17 Q. And in the section below that's highlighted?

18 A. To advise Harvest Small Business Finance LLC of your new
19 address.

20 Q. And this is because this loan was funded by Harvest?

21 A. Yes.

22 Q. Going back to page 9. Okay. So we looked at how this is
23 the note. And this is essentially a promissory note; correct?

24 A. Correct.

25 Q. It spells out the terms between the borrower and the

1 lender, Harvest; correct?

2 A. Correct.

3 Q. I'm showing you the section of the note, Section 12. It's
4 on page 9, Bates-stamp number 2966. Let me grab it.

5 What does it say there in the title?

6 A. Borrower certifications.

7 Q. And what does it say below that?

8 A. Borrower certifies as follows.

9 Q. Can you read A?

10 A. "Current economic uncertainty makes this loan necessary to
11 support the ongoing operations of borrower."

12 Q. And then what does the borrower certify in paragraph B?

13 A. "Loan funds will be used only to retain workers and to
14 maintain payroll or make other payments specifically set forth
15 in this note under Section 3: Loan forgiveness."

16 Q. And this is a certification from the borrower to the
17 lender?

18 A. Yes.

19 Q. And does Harvest rely on these certifications when
20 purchasing a note?

21 A. We rely only on the borrower's certifications, yes.

22 Q. Scrolling down to D. If you can read Section D, under
23 borrower certifications?

24 A. "Borrower was in operation on February 15, 2020, and had
25 employees for whom it paid salaries and payroll taxes and has

1 not permanently closed."

2 Q. I mean, after all, that was the purpose of the Paycheck
3 Protection Program loans?

4 A. Right. The purpose was to pay its employees.

5 Q. Would Harvest fund a loan if it knew that a borrower lied
6 on the loan application?

7 A. No. Absolutely not.

8 Q. Does Harvest rely on the truthfulness of the borrower on
9 the loan application?

10 A. Yes.

11 Q. Does Harvest rely on the truthfulness and the
12 certifications of the borrower?

13 A. Yes.

14 Q. Would Harvest have purchased this note from Lendistry had
15 it known that the borrower lied on the loan application?

16 MR. WILCOX: Objection to the use of the word lie,
17 Judge.

18 THE COURT: I'm going to sustain the objection to the
19 question the way it was presented.

20 MR. ZACCA: Very well, Judge.

21 BY MR. ZACCA:

22 Q. Would Harvest purchase a note in this case, the unfunded
23 note as you described earlier, if it knew that the information
24 on the loan application was not true?

25 A. No.

1 Q. No, it would, or no, it wouldn't?

2 A. It would not have purchased it.

3 MR. ZACCA: No further questions.

4 CROSS-EXAMINATION

5 BY MR. WILCOX:

6 Q. Excuse me, ma'am. What's your name again?

7 A. Meghan Musil.

8 Q. Ms. Musil, good afternoon. How are you?

9 A. Good. How are you?

10 Q. Ms. Musil, the application that counsel was just
11 referencing, you don't know who completed it, do you?

12 A. I do not.

13 Q. Okay. And did you testify that you processed PPP loan
14 applications?

15 A. Yes.

16 Q. Okay. How long have you been processing PPP loan
17 applications?

18 A. Since January of 2021.

19 Q. And do you know whether or not some of the small business
20 owners hired people to prepare the loan applications?

21 A. I -- I -- do you mean this specific loan or --

22 Q. In general.

23 A. In general, I'm not sure.

24 Q. You're not sure of what?

25 A. I'm not sure if -- I mean, CPAs would sometimes work on

1 the applications for borrowers. I know that.

2 Q. Well, that's what I mean. I mean, sometimes small
3 business owners would get assistance in the preparation of the
4 PPP loan applications; correct?

5 A. Sure.

6 Q. Okay. And you don't know whether or not in this instance
7 Ms. Wade hired someone to help her prepare the PPP loan
8 application?

9 A. I do not know.

10 MR. WILCOX: Okay. Thank you. No further questions.

11 MR. ZACCA: Nothing.

12 THE COURT: May the witness be excused permanently?

13 MR. ZACCA: Yes, Judge.

14 MR. WILCOX: Yes.

15 THE COURT: You may step down. You are excused.

16 MR. ZACCA: Judge, the Government calls Melinda
17 Smith.

18 (Government witness, MELINDA SMITH, duly sworn.)

19 COURT CLERK: Please state your name and spell it for
20 the record.

21 THE WITNESS: Okay. My name is Melinda Smith, and
22 it's spelled M-E-L-I-N-D-A, S-M-I-T-H.

23 DIRECT EXAMINATION

24 BY MR. ZACCA:

25 Q. Good afternoon.

1 A. Good afternoon.

2 Q. What do you do for a living?

3 A. I work for the Internal Revenue Service in the criminal
4 investigation as a court witness coordinator.

5 Q. How long have you been with the Internal Revenue Service?

6 A. 20 years.

7 Q. And the Internal Revenue Service is also known as the IRS?

8 A. That is correct.

9 Q. So we'll just use IRS to make it simple. We all know what
10 the IRS is.

11 So you've worked for the IRS for 20 years. Can you
12 explain to the jury the various positions you've had at the
13 IRS?

14 A. Yes. I was in customer service. I was a tax analyst. I
15 did data transcribing. I did a mail clerk position. Those
16 are just some of them. I've done multiple jobs and I can't
17 remember all of them, but -- over the course of 20 years, of
18 course.

19 Q. But in the 20 years that you've had and the various
20 positions you've had at the Internal Revenue Service or the
21 IRS, have you become familiar with IRS tax returns?

22 A. I have.

23 Q. Are you familiar with individual tax returns?

24 A. I am.

25 Q. Are you familiar with the form called Schedule C?

1 A. Yes.

2 Q. And Form 1040?

3 A. Yes.

4 Q. And W-2s?

5 A. Yes.

6 Q. All those names --

7 A. Yes.

8 Q. -- assigned to those types of forms?

9 A. Yes.

10 Q. Are you here representing the commissioner of the IRS --

11 A. I am.

12 Q. -- as the custodian of records --

13 A. That is correct.

14 Q. -- to establish tax returns for a particular taxpayer?

15 A. That's correct.

16 Q. The official tax records on file with the IRS?

17 A. That's correct.

18 Q. I'm going to show you what's already been entered into
19 evidence as Government Exhibit 200. I'm going to showcase
20 certain sections and we're going to go through this.

21 Have you seen Government 200 before?

22 A. I have.

23 Q. Is this a US Individual Income Tax Return, also known as a
24 Form 1040?

25 A. That is correct.

1 MR. WILCOX: Excuse me, Counsel. What exhibit number
2 again? I'm sorry.

3 MR. ZACCA: Exhibit 200.

4 MR. WILCOX: Thank you.

5 MR. ZACCA: Bates stamp page 3113.

6 BY MR. ZACCA:

7 Q. Okay. Is this the official 1040 Individual Income Tax
8 Return for the year 2018 for Carolyn Wade for Social Security
9 592-09-0026?

10 A. That is correct.

11 Q. I'm going to highlight certain sections and I want you to
12 explain to the jury the significance of it.

13 A. Okay.

14 Q. On the top there, what is that that we're looking at?

15 A. That's a stamp from the Internal Revenue Service showing
16 that this tax return was electronically filed.

17 Q. So this is something internal that the IRS applies to this
18 document?

19 A. That is correct.

20 Q. What does DLN stand for?

21 A. Document locator number.

22 Q. And that, again, is an internal number assigned by the IRS
23 to this document --

24 A. That is correct.

25 Q. -- once it comes in electronically from the taxpayer?

1 A. Yes.

2 Q. Let's talk about a Form 1040 generally, and then we're
3 going to go back into this document.

4 A. Okay.

5 Q. What is a Form 1040?

6 A. A 1040 is an individual tax return.

7 Q. And what is it used for?

8 A. It's used for --

9 MR. WILCOX: Objection, Your Honor. The relevance of
10 this line of questioning.

11 THE COURT: Is this in regard to an item that's in
12 evidence?

13 MR. ZACCA: Yes, Judge, this is in evidence.

14 THE COURT: Do you want to come sidebar?

15 MR. WILCOX: No. No.

16 THE COURT: All right. Overruled.

17 BY MR. ZACCA:

18 Q. Okay. Can you explain what a Form 1040 is?

19 A. Yes. It's the individual who reports their tax return
20 income, profit and loss, et cetera, and credits and stuff like
21 that on their tax return once a year, and it's due by
22 April 15th of every following year.

23 Q. So it's what every US citizen that pays taxes has to file
24 by April 15th on a yearly basis; is that correct?

25 A. That's correct.

1 Q. Where they report their income?

2 A. That's correct.

3 Q. And any allowable expenses?

4 A. Yes.

5 Q. And at the very end, they either owe money to the IRS or
6 are entitled to a refund if they've overpaid their taxes for
7 that particular year?

8 A. That is correct.

9 Q. What is highlighted there in yellow, under the words tax
10 return?

11 A. Filing status: Married, filing separately.

12 Q. Explain to the jury what that means.

13 A. That means that Carolyn Wade is married but she's filing
14 2018 tax returns separately from her spouse.

15 Q. Does it list a home address?

16 A. It does.

17 Q. Can you state it for the record?

18 A. Yes. It's 8447 Northwest 51st Place, Coral Springs,
19 Florida 33067.

20 Q. On the bottom of this page there's a section that says,
21 "Sign here." And then there's asterisks appearing under the
22 words your signature. Do you see that?

23 A. I do.

24 Q. What do those asterisks represent?

25 A. Electronic signature from the taxpayer.

1 Q. What is the date reflected there?

2 A. February 8, 2019.

3 Q. Is that the date of filing?

4 A. That is.

5 Q. And does it list the occupation of the taxpayer?

6 A. It does.

7 Q. Now, there's a section here that says "paid preparer use
8 only." What is that section for?

9 A. It's for paid preparer like an attorney or an accountant
10 who may have filed the taxpayer's tax return for them.

11 Q. And this section is left blank?

12 A. That is correct.

13 Q. Going to page 2, Government Exhibit 200, Bates stamp
14 number 3114. In the very top line -- let me grab it --

15 MR. WILCOX: What exhibit, Mr. --

16 MR. ZACCA: We're still on 200, Government
17 Exhibit 200, page 2.

18 BY MR. ZACCA:

19 Q. On line 1, what does it read there?

20 A. "Wage, salary, tips, et cetera, attach forms, W-2."

21 Q. W-2. What is a W-2?

22 A. A W-2 is what the taxpayers usually read when they are
23 wage employees.

24 Q. Is it what the employer provides the employee of what
25 their wages are?

1 A. Yes, that is correct.

2 Q. And that's reported on line 1?

3 A. That is correct.

4 Q. Now -- actually, let me grab a bigger image.

5 In 2018, Carolyn Wade reported, on line 1, \$80,256.

6 Line 6 reflects how much?

7 A. Negative \$30,330.

8 Q. And what does that do to the column on the right? What
9 does it do to the reported income?

10 A. It lowers it.

11 Q. To understand this number, \$30,330, does one go to
12 Schedule 1?

13 A. That is correct.

14 Q. Showing page 3 of Government 200. Are we looking at
15 Schedule 1?

16 A. We are.

17 Q. And what is described on line 12? If you can read it for
18 the jury.

19 A. Okay. It says "Business income or loss, attach Schedule C
20 or C-EZ." And it's an amount negative \$30,330.

21 Q. Going to page 10, Bates stamp number 3122.

22 What does it say there?

23 A. It says "Schedule C, Form 1040, profit or loss from
24 business sole proprietorship."

25 Q. For the year 2018?

1 A. For 2018.

2 Q. For Carolyn Wade?

3 A. For Carolyn Wade.

4 Q. What does it say here in Section A?

5 A. Hairstylist.

6 Q. And what is described as the business name?

7 A. One Step A-Head.

8 Q. And what is described as the business address for this
9 business, One Step A-Head?

10 A. 8447 Northwest 51st Place, Coral Springs, Florida 33067.

11 Q. Do you recall that's the same home address that she
12 reported on page 1 of the 1040?

13 A. Yeah. Can you go back?

14 Q. Sure.

15 A. Yes, it is.

16 Q. Going back to page 10, Bates stamp 3122, again, looking at
17 the Schedule C, we've established she reported a hairstylist
18 business, One Step A-Head. She reported the business address
19 of her home, 8447 Northwest 51st Place, Coral Springs, Florida
20 33067.

21 Now, can you read to the jury what this section
22 reports, part one?

23 A. Okay. It reports income.

24 Q. Line 1 says what?

25 A. Gross receipts or sales. And it says -- do you want me to

1 read --

2 Q. Yes, please, the whole section that's highlighted.

3 A. Okay. "Gross receipts or sales, see instructions for
4 line 1 and check the box if this income was reported to you on
5 your W-2," and the statutory employee box on that form was
6 checked. The amount shown is \$3,500.

7 Q. And then there's a few other lines here. If you could --
8 what is the description of line 5?

9 A. Line 5 is gross profit. You subtract line 4 from line 3.

10 Q. And she reports how much in gross profit?

11 A. 3,500.

12 Q. And in line 7, how much does she report in gross income?

13 A. 3,500.

14 Q. For the year 2018?

15 A. That is correct.

16 Q. And then part two is an expense section?

17 A. That is correct.

18 Q. How much is listed for advertising and expenses for this
19 business?

20 A. \$80.

21 Q. And car and truck expenses?

22 A. 14,530.

23 Q. Office expenses?

24 A. 1,800.

25 Q. Supplies?

1 A. 1,700.

2 Q. And she lists taxes and licenses?

3 A. Yes. \$120.

4 Q. How much for travel?

5 A. \$5,000.

6 Q. Deductible meals?

7 A. 600.

8 Q. Utilities?

9 A. 8,400.

10 Q. And other expenses?

11 A. 1,600.

12 Q. For a total expense of \$33,830?

13 A. That's correct.

14 Q. And what was the profit or loss for this home business?

15 A. A negative \$30,330.

16 Q. We noted how for this hairstylist home business there was
17 expenses listed for \$14,530 for car and truck expenses.

18 A. Yes.

19 MR. WILCOX: Judge, I'd request that sidebar now.

20 No?

21 THE COURT: Is there an objection to the question
22 that was just asked?

23 MR. WILCOX: There's an objection to -- yes.

24 THE COURT: To the last question?

25 MR. WILCOX: Yes, Your Honor.

1 THE COURT: What is the legal basis?

2 MR. WILCOX: Judge, relevance.

3 THE COURT: I'm sorry?

4 MR. WILCOX: Relevance, Your Honor.

5 THE COURT: This is a reference to a document in
6 evidence; correct?

7 MR. ZACCA: Yes, sir.

8 THE COURT: It's in evidence.

9 MR. WILCOX: I know it's in evidence, Your Honor.

10 THE COURT: All right. Overruled.

11 BY MR. ZACCA:

12 Q. Is there a section here -- well, 44 -- I don't want the
13 circle. I want the highlight. Can you read 44?

14 A. Yes. It says "Of the total number of miles you drove your
15 vehicle during 2018, enter the number of miles you used your
16 vehicle for: A, business, \$24,000; B, commuting, see
17 instructions." It's blank. "C, other, \$2,000."

18 MR. MCCRAY: Judge, it's not speaking of dollars.
19 Objection.

20 MR. ZACCA: Well, let me -- fair enough. Let me pull
21 that back up again. Forgive me. Let me grab it and make it
22 bigger.

23 BY MR. ZACCA:

24 Q. Is it referencing -- hold on. Let me grab the whole
25 section. Is it referencing miles or dollars?

1 A. I'm sorry. I didn't understand.

2 Q. Okay. When you say, "other, 2,000," did you mean dollars?

3 A. Yes, \$2,000.

4 Q. Okay. Going to page 13 of, again, Government Exhibit 200.

5 What are we looking at here?

6 A. We're looking at an electronically filed W-2 Form for
7 Carolyn Wade for 2018.

8 Q. And who is the listed employer?

9 A. Can I spell it? Because I don't think that that first
10 word is --

11 Q. Yes, if you can spell it for the record.

12 A. Okay. It's "C-N-T-Y of," and then it's "B-R-W-R-D Off of
13 Sheriff."

14 Q. Okay. And what is the listed wages?

15 A. \$80,256.

16 Q. I want to go back to -- just to clarify -- this section we
17 were looking at earlier about information about your vehicle.

18 Just to clarify, the number 2,000, is that
19 referencing miles?

20 A. Oh, I'm sorry. I misspoke. It is referencing miles.

21 Q. Okay. I want to go back to page 2 of this 1040 and point
22 out line 10. What does line 10 read?

23 A. "Taxable income: Subtract lines 8 and 9 from line 7. If
24 0 or less, enter 0." And the dollar amount shown is \$37,926.

25 Q. So from the reported wages of \$80,256 --

1 A. Yes.

2 Q. -- it was lowered by the Schedule C --

3 A. That's correct.

4 Q. -- of \$30,330?

5 A. That's correct.

6 Q. And there's a standard deduction. What is the standard
7 deduction on line 8?

8 A. What is it?

9 Q. Yes.

10 A. It's \$12,000.

11 Q. But is that an allowable deduction for a taxpayer?

12 A. Yes.

13 Q. Which reduces the taxable income. What is taxable income?

14 A. Taxable income is your -- you know, from your wages.

15 Q. Is it what the tax is calculated from?

16 A. Yes, it is.

17 Q. The tax that you owe the government?

18 A. Yes.

19 Q. And in this case, according to this tax return that was
20 filed, was money owed to the government or was it a refund?

21 A. It's a refund of \$4,000 -- \$4,702.

22 Q. Which was paid to Carolyn Wade?

23 A. That is correct.

24 Q. I'm now going to show you Government Exhibit 201.

25 A. Okay.

1 Q. What are we looking at here?

2 A. An electronically filed 1040 Form Individual Tax Return
3 for 2019.

4 Q. Let me grab a little bigger frame. Okay.

5 Who is this tax return for?

6 A. Carolyn Wade.

7 Q. And Social Security number?

8 A. 592-09-0026.

9 Q. And we know that this is an official record filed with the
10 IRS because of the DLN number; correct?

11 A. That is correct.

12 Q. What does it say in the section I just highlighted?

13 A. "Married, filing separately."

14 Q. What is the listed home address?

15 A. 8447 Northwest 51st Place, Coral Springs, Florida
16 33067-1974.

17 Q. What is the reported wages and salaries on line 1?

18 A. \$90,236.

19 Q. And then on line 7, what does it report on line 7?

20 A. Other income from Schedule 1, line 9, negative \$18,615.

21 Q. And like we did for 2018, do we now have to go to
22 Schedule 1 to get more information about that number?

23 A. That is correct.

24 Q. Going to page 9 of Government Exhibit 201.

25 Is this the Schedule 1?

1 A. It is.

2 Q. And what does it say here on line 3?

3 A. "Business income or loss, attach Schedule C, negative
4 \$18,615."

5 Q. And to get more information about that negative number
6 \$18,615, we now need to go to Schedule C?

7 A. That's correct.

8 THE COURT: All right. Mr. Zacca --

9 MR. ZACCA: Yes, sir.

10 THE COURT: -- I'm going to stop you at this time.
11 It is 4:00 PM. So we will resume tomorrow morning at 9:30 AM.

12 Please remember not to discuss the case in any way,
13 ladies and gentlemen. Have a great evening.

14 (Jury exited at 3:59 PM.)

15 THE COURT: Any issues I need to entertain?

16 MR. SNIDER: No matters from the Government.

17 MR. MCCRAY: None, Judge, from the defense.

18 THE COURT: Have a good evening, everyone.

19 (Proceedings concluded at 4:01 PM.)
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23
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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: June 12, 2024 /s/Lance W. Steinbeisser
Lance W. Steinbeisser, FCRR, RPR, FPR-C
Official Court Reporter
United States District Court
Southern District of Florida
Miami, Florida

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