

1 A. No.

2 Q. Did you -- did you pay any less attention to  
3 testimony received in a case in which you were not  
4 presented with an Indictment?

5 A. No.

6 Q. Did you know, at the time that you received  
7 testimony, whether or not you would be presented with an  
8 Indictment in that case?

9 A. No, not always.

10 Q. Did you ever -- did you ever -- were you ever  
11 presented with an Indictment in which testimony had  
12 previously been introduced before a different grand jury?

13 A. Yes.

14 Q. In those instances, did you have an opportunity to  
15 consider the testimony that had been given before the  
16 previous grand jury?

17 A. Yes.

18 Q. While you were serving on Federal Grand Jury 06-1,  
19 did you hear evidence related to an investigation  
20 concerning alleged frauds perpetrated against staffing  
21 companies?

22 A. Yes.

23 Q. Do you recall the names of the companies that came up  
24 during that investigation?

25 A. Some of them.

1 Q. Which names do you recall?

2 A. Leading Team, LRH (sic).

3 Q. Do you remember a company called DKH?

4 A. DKH, yes.

5 Q. How about IRP?

6 A. Yes.

7 Q. And do you remember the names of any individuals who  
8 were the focus of that investigation?

9 A. Yes.

10 Q. Which names do you remember?

11 A. Rose Banks, David Banks, of course, Lawanna Clark.

12 Q. Okay. Well, let's talk about Ms. Clark a little bit  
13 more. Do you recall receiving testimony from Ms. Clark as  
14 a part of that investigation?

15 A. Yes.

16 Q. Do you recall whether she testified about her family  
17 relationship to any of the other Banks that you have just  
18 mentioned?

19 A. Yes.

20 Q. Do you recall looking at some exhibits during her  
21 testimony?

22 A. Yes, I do.

23 MR. KIRSCH: Could I ask, please, to publish, Your  
24 Honor, Government Exhibit 3?

25 THE COURT: You may.