

1 A. Any commissions.

2 Q. What happened to those commissions?

3 A. I didn't get any.

4 Q. And otherwise you would have?

5 A. I would have gotten a percentage, yes.

6 MR. KIRSCH: Thank you, Ms. Williams.

7 No other questions, Your Honor.

8 THE COURT: Mr. Banks, you may proceed.

9 MR. BANKS: Can I have a moment, Your Honor?

10 THE COURT: You may.

11 **CROSS-EXAMINATION**

12 **BY MR. BANKS:**

13 Q. Ms. Williams, a minute ago you had said that
14 Mr. Harper told you about contracts. Then you followed
15 that up with he didn't tell you -- he told you about
16 contracts prior to engaging in business. Then you
17 followed up after you filled out -- later on, you said he
18 filled out a credit report, and you checked his banking
19 references, et cetera. Then you said he didn't tell you
20 about contracts until he was past due. Which is it?

21 A. I didn't say he didn't tell me about contracts until
22 he was past due. He told me that they were getting ready
23 to sign the contracts. When the -- when his account was
24 past due, I called him, and he said they were getting
25 ready to sign the contracts and would be able to get me

1 payment after that.

2 Q. And it is your testimony that that is what you just
3 said a few minutes ago, correct?

4 A. That is what I believe I said, yes.

5 Q. Okay. Now, there was a reference made to a credit
6 check of SWV?

7 A. Uh-huh.

8 Q. And do you have any reason to believe that SWV was
9 not a legitimate business?

10 A. No.

11 Q. Is it illegal to -- in your opinion, is it illegal to
12 use a credit reference -- to use the appropriate credit
13 reference for his company if it isn't a valid credit
14 reference?

15 MR. KIRSCH: Object to the reference of the opinion
16 regarding the legality.

17 THE COURT: Sustained.

18 Q. (BY MR. BANKS) Do you think there is a problem with
19 using another business for a credit reference that is a
20 legitimate business?

21 A. Can you repeat that?

22 Q. Do you think there is a problem using another
23 business that is a legitimate business as a credit
24 reference?

25 MR. KIRSCH: Object to the relevance of the

1 witness' opinion.

2 THE COURT: Overruled.

3 THE WITNESS: Do I think it is a problem to use
4 another business that is legitimate as a credit reference?

5 Q. (BY MR. BANKS) Yes.

6 A. No.

7 Q. Did you communicate to Mr. Harper, either verbally or
8 in writing, that he cannot use any credit reference that
9 he might know somebody who owns the business?

10 A. I don't recall if I did.

11 Q. Do you recall the Los Angeles Police Department?

12 A. I do.

13 Q. Do you recall New York Police Department?

14 A. Uh-huh.

15 Q. But it is your testimony that you can't recall
16 whether or not you told Mr. Harper you didn't want him to
17 use a credit reference that he might know personally --
18 know personally?

19 A. Correct.

20 Q. Now, how does Personnel Plus determine whether or not
21 they are going to engage in business with a client; is it
22 credit policy or what?

23 A. We check their bank references and their, you know,
24 vendor references. And if they come back where they are a
25 good reference, we will go ahead and work with them.

1 Then, based on payment is if we will continue to work with
2 them.

3 Q. Okay. So is it correct in assuming that Mr. Harper's
4 banking references, et cetera, came back clean?

5 A. Yes.

6 Q. So, in other words, Mr. Harper had good credit?

7 A. Of what we were able to get, yes.

8 Q. Okay. And that was determinative in you moving
9 forward to engage in business; is that correct?

10 A. Yes.

11 Q. If the credit check had come back poor, would you
12 have engaged in business with Mr. Harper?

13 A. We would not have.

14 Q. Thank you.

15 MR. BANKS: I have no further questions, Your
16 Honor.

17 THE COURT: All right. Anybody else?

18 MR. WALKER: No, Your Honor.

19 THE COURT: Any redirect?

20 MR. KIRSCH: No, thank you, Your Honor.

21 THE COURT: All right. May this witness be
22 excused?

23 MR. KIRSCH: Yes, please.

24 THE COURT: Thank you very much, you are excused.
25 Government may call its next witness.