

1 that correct?

2 A. Yes. Yes.

3 MR. KIRSCH: Your Honor, I am going to ask that the
4 portions of 423.00 and 423.01 that relate to the payrolled
5 employees at IRP be deemed admissible.

6 THE COURT: Any objection?

7 MR. BANKS: No objection, Your Honor.

8 THE COURT: All right. Those portions that have
9 just been identified of 423.00 and 423.01 are deemed
10 admissible.

11 (Exhibit No. 423.00, 423.01 are found admissible.)

12 MR. KIRSCH: Thank you, Your Honor. And I have no
13 other questions for Ms. Carter.

14 THE COURT: All right. Mr. Banks, you may proceed.

15 MR. BANKS: Thank you.

16 **CROSS-EXAMINATION**

17 **BY MR. BANKS:**

18 **Q. Ms. Carter, in engaging in a business -- initiating a**
19 **business relationship with IRP Solutions, can you explain**
20 **a little bit about what Technisource relied on to engage**
21 **in that relationship?**

22 **A. Are you asking what background we did prior to?**

23 **Q. Yes, ma'am.**

24 **A. From a credit -- you know, from a credit standpoint,**
25 **we did a credit bureau check and a Dun & Bradstreet check.**

1 Q. Okay.

2 A. That is what I did.

3 Q. And what were the results of that credit check?

4 A. There was no -- it was limited information. However,
5 there was no derogatory information.

6 Q. Okay. And would you say Technisource relies on that
7 information on whether or not they are going to engage in
8 business with a client?

9 A. At the time that was a part of the process in order
10 to begin a relationship with a new customer.

11 Q. What is the rest of the process?

12 A. As far as from the sales perspective, it's -- you
13 know, there is a conversation with the client. There's a,
14 you know, an understanding of what the project is going to
15 be or what the relationship is going to be. Documents are
16 signed, such as a service agreement.

17 Q. So just more of a familiarization with the client;
18 what type of business they are, et cetera. Press the
19 flesh, if you will; a hand shake, meet face to face and
20 discuss those types of issues, correct?

21 A. It is not always a face-to-face meeting.

22 Q. Okay. Thank you. Now if, the credit came back poor,
23 would Technisource have engaged in business with IRP?

24 A. Probably not.

25 Q. Okay. Did Mr. Banks at any time try to run from

1 with Technisource?

2 A. Correct.

3 MR. BARNES: No further questions.

4 MR. WALKER: One moment, Your Honor.

5 THE COURT: Mr. Walker?

6 MR. WALKER: Could we have one moment?

7 Your Honor, may we republish Government Exhibit 14?

8 THE COURT: You may.

9 **CROSS-EXAMINATION**

10 **BY MR. WALKER:**

11 **Q. Ms. Carter, just take a minute to glance at that so**
12 **you can be aware of its contents.**

13 **A. Uh-huh.**

14 **Q. So, in this letter, Mr. Banks is proposing a payment**
15 **schedule for IRP Solutions to pay your company; is that**
16 **correct?**

17 **A. Yes.**

18 **Q. And in this payment schedule, he has basically**
19 **outlined 6 months to repay on the outstanding invoices.**
20 **Do you agree?**

21 **A. Yes.**

22 **Q. And what does this repayment -- proposed repayment**
23 **schedule indicate to you, as far as the intentions of**
24 **Mr. Banks?**

25 **MR. KIRSCH: Objection, lack of foundation.**

1 THE COURT: Overruled.

2 THE WITNESS: That there was going to be an influx
3 of cash in order for them to be able to pay the invoices.

4 Q. (BY MR. WALKER) Okay. And you would agree that he's
5 stating that that anticipated flow of cash would come from
6 one of the agencies that IRP Solutions is currently
7 working to close business on?

8 A. Yes. That is what the letter says.

9 MR. WALKER: No further questions, Your Honor.

10 THE COURT: Redirect?

11 MR. KIRSCH: Thank you, Your Honor.

12 Your Honor, could we please publish 420.01,
13 starting with page 15.

14 Can you enlarge I and II for us, Special Agent
15 Smith.

16 **REDIRECT EXAMINATION**

17 **BY MR. KIRSCH:**

18 Q. Ms. Carter, this is the exhibit to the agreement
19 between Technisource and IRP; is that right?

20 A. Yes.

21 Q. And this referred -- the scope of work here is
22 network services and network administration?

23 A. Uh-huh.

24 Q. Is that the kind of service you were discussing just
25 a minute ago with one of the people asking you questions