

UNITED STATES OF AMERICA, ) CR 17-00101 LEK  
 )  
 Plaintiff, ) Honolulu, Hawaii  
 ) February 4, 2020  
 vs. )  
 ) JURY TRIAL - DAY 2  
 (1) ANTHONY T. WILLIAMS, )  
 )  
 Defendant. )  
 )

APPEARANCES :

For the Government: KENNETH M. SORENSON, AUSA  
GREGG PARIS YATES, AUSA  
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Honolulu, Hawaii 96850

Also Present: MEGAN CRAWLEY, Special Agent FBI

For the Defendant (1) ANTHONY T. WILLIAMS, *Pro Se*  
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United States District Court  
300 Ala Moana Boulevard  
Honolulu, Hawaii 96850

UNITED STATES DISTRICT COURT

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**MEGAN CRAWLEY**

Direct Examination By Mr. Sorenson

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1 TUESDAY, FEBRUARY 4, 2020 8:47 A.M.

2 (Open court in the presence of the jury.)

3 THE COURTROOM MANAGER: Criminal No. 17-00101 LEK  
4 United States of America versus Anthony T. Williams.

5 The matter is set for day 2 of jury trial.

6 Counsel, please make your appearances for the record.

7 MR. SORENSON: Good morning, Your Honor.

8 Assistant U.S. Attorneys Ken Sorenson and Gregg Yates  
9 here for the United States. We have FBI Special Agent Megan  
10 Crawley with us.

11 THE COURT: All right. Good morning to all of you.  
12 Mr. Williams.

13 THE DEFENDANT: Private attorney general Anthony  
14 Williams in propria persona.

15 MR. ISAACSON: Your Honor, standby attorney Lars  
16 Isaacson with Claire Beecher who's here at counsel table.

17 THE COURT: All right. Good morning to all of you.  
18 And good morning, ladies and gentlemen of the jury.

19 Welcome back. Before we start closing -- opening  
20 argument -- opening statements, does anyone want to try the  
21 hearing assisted -- or amplification? You would? Okay. So  
22 let's get that for you.

23 All right. I'll just do a testing. Testing. Can you  
24 hear us?

25 THE JUROR NO. 5: (Nods.)

1                   THE COURT: Okay. Very good. And let me just  
2 inquire of the parties, will anybody be showing any documents  
3 during opening, or visual?

4                   MR. SORENSON: Your Honor, I think Mr. Williams is  
5 going to show some documents and we're going to assist him with  
6 getting the ELMO set up. So once Mr. Yates finishes, we'll  
7 come up and kind of get that going.

8                   THE COURT: Okay. And I wanted to do a test run  
9 with the iPads just to make sure.

10                  MR. SORENSON: Okay.

11                  THE COURT: So if you could open your iPads up.  
12 Thank you, Mr. Sorenson. I appreciate that. And we will get a  
13 document. Just anything, really.

14                  Thank you very much, Mr. Isaacson. Okay. And we'll see.

15                  All right. Raise your hand if you can't see the February  
16 2020 calendar. All right. Very good. Looks like everybody's  
17 iPad is working.

18                  Okay. Thank you very much. I didn't want you to be  
19 troubled during your opening.

20                  And with that, is the government going to be giving an  
21 opening statement?

22                  MR. SORENSON: We are, Your Honor.

23                  THE COURT: All right. Mr. Yates.

24                  MR. YATES: Good morning.

25                  Anthony Williams played on struggling homeowners here in

1 the District of Hawaii at their most desperate hour. Some were  
2 struggling with their mortgages but were paying and were  
3 current on their mortgage payments. Others were falling  
4 behind. Some of them were treading water and others were  
5 drowning in debt.

6 Anthony Williams promised these homeowners that he could  
7 provide them relief from their mortgage payments. He promised  
8 that if they stopped paying their current mortgage lenders and  
9 paid him just half of what he was paying to their current  
10 mortgage lenders, that he would discharge their loans.

11 These homeowners thought that Anthony Williams was  
12 throwing them a life preserver. In fact, Anthony Williams  
13 threw them an anchor and watched them drown.

14 Good morning, ladies and gentlemen. My name is Gregg  
15 Yates. I am an Assistant U.S. Attorney here in the District of  
16 Hawaii. With me at counsel's table is Assistant U.S. Attorney  
17 Ken Sorenson and Megan Crawley, a special agent from the  
18 Federal Bureau of Investigation.

19 The government has charged Anthony Williams with a  
20 32-count superseding indictment, that is, 15 counts of wire  
21 fraud and 17 counts of mail fraud.

22 Briefly, and in sum, the government has charged the  
23 defendant, Anthony Williams, with devising a scheme to defraud  
24 and obtain money from homeowner victims and banks and mortgage  
25 service providers by way of false promises, pretenses and

1 representations in connection with a mortgage fraud scheme, and  
2 that he used interstate wires and the U.S. mails as part of  
3 that scheme.

4 Now, the government will be presenting its case-in-chief  
5 through the testimony of witnesses and through evidence. This  
6 morning I will summarize at a high level the evidence that the  
7 government will present to you over the course of its  
8 case-in-chief. I will then walk you through some of the  
9 elements -- or rather the elements of the counts that the  
10 government has charged in its superseding indictment.

11 Let's talk about the evidence first. First, the  
12 government is going to call some law enforcement agent  
13 witnesses. You will first hear from Special Agent Megan  
14 Crawley who's seated at counsel's table. Special Agent Crawley  
15 was the case agent for the FBI's investigation into Anthony  
16 Williams's conduct in the District of Hawaii. Agent Crawley  
17 will testify to her investigation efforts, provide you with an  
18 overview, and then we'll walk you through some of the documents  
19 that she obtained as part of her investigation.

20 You will then hear from Special Agent Joseph Lavelle, an  
21 FBI agent based in Miami, Florida. Agent Lavelle will testify  
22 regarding circumstances of Anthony Williams's arrest in  
23 Florida. And Agent Lavelle will testify that on Anthony  
24 Williams's person was a metal shield, a badge of the kind that  
25 law enforcement carries, an official-looking government ID,

1 and -- or I should say an official-looking ID and handcuffs.

2       Next the government will present the testimony of  
3 homeowner victim witnesses. These homeowner witnesses will be  
4 testifying throughout the remainder of the government's  
5 case-in-chief interspersed with other witness testimony. But  
6 you're going to be hearing from Julita Asuncion, from Loreen  
7 Troxel, you'll be hearing from Evelyn Subia, from Nelson  
8 Madamba, from Macrina Pillos, and from Mary Jean Laforteza, and  
9 Melvyn Ventura.

10       These witnesses all have several things in common. These  
11 homeowners were all from the Philippines. They are not  
12 non -- excuse me -- they are not native English speakers, and  
13 they're all homeowners that were paying very high monthly  
14 mortgage payments.

15       These homeowner -- homeowners will then testify that they  
16 learned about Anthony Williams's program through some people in  
17 their own community, Henry Malinay and Anabel Cabebe, two  
18 individuals that Anthony Williams used to recruit people to his  
19 mortgage debt relief program. And these homeowner victims will  
20 tell you that when they were introduced to Anthony Williams,  
21 that he introduced himself to them as a Private Attorney  
22 General, or an attorney. Some of them saw a law enforcement  
23 badge that he was carrying and that they believed that he was  
24 an attorney and that he was affiliated with law enforcement and  
25 that he was in some way appointed by the government to do



1 public service.

2           And these homeowner victims will then testify to what  
3 Anthony Williams told them, that he could reduce their mortgage  
4 debts, discharge them all together. All they would have to do  
5 is pay him half of what they were paying to their lenders. And  
6 Anthony Williams told them he would file on their behalf a UCC  
7 financing statement or UCC loan with the Bureau of Conveyances,  
8 and he would file an MEI mortgage. MEI is the name of his  
9 company, Mortgage Enterprise Investments. And that these two  
10 documents which you will see, the UCC financing statement or  
11 UCC lien and the MEI mortgage would discharge the homeowner's  
12 existing loan to their lender.

13           And Anthony Williams told them that he would file these  
14 documents with the Bureau of Conveyances, discharge their  
15 loans, and all they would have to do is pay him half of the  
16 payments they were making to their current lenders. And should  
17 the lenders then pursue the homeowner to try to obtain their  
18 monthly payments that they believe that they were due, Anthony  
19 Williams claimed that he could represent them in court, that he  
20 was an attorney.

21           He represented that he had a law firm, the Common Law  
22 Office of America, C-L-O-A, and that Anthony Williams could  
23 protect them if the banks tried to foreclose on their homes.  
24 So the homeowner victims relied on Anthony Williams's  
25 representations. They signed up for Anthony Williams's MEI

1 program and they believed him.

2 Next the government is going to call its expert witness  
3 and some witnesses from some state regulatory agencies and from  
4 the Hawaii State Bar Association. The government's expert  
5 witness is Mr. Simon Klevansky. Mr. Klevansky is a practicing  
6 attorney in the state of Hawaii. He has over 35 years of  
7 experience and he has expertise in the area of creditors'  
8 rights. Mr. Klevansky will give you a basic understanding of  
9 how mortgages work.

10 In short, a mortgage has two main elements. There is a  
11 loan and then there's a lien. We all have an intuitive idea of  
12 what a loan is. In order to buy a house, particularly in an  
13 expensive place like Hawaii, a person has to obtain a large  
14 chunk of money. He can go to a bank and obtain a large chunk  
15 of money. Person promises to that bank that he'll take that  
16 large chunk of money but he'll pay it back, a little at a time  
17 over a long period with interest. That's the loan.

18 But how does the bank have any assurance that the  
19 borrower's not going to just run off and stop paying? That's  
20 the second part of a mortgage. That's the lien.

21 You'll understand that in order to protect its  
22 investments, lenders put liens on property that a buyer may  
23 purchase, a house in a typical situation. And if the borrower  
24 stops paying, the large chunk of money that he borrowed, well,  
25 then, the bank or the lender has a recourse. The lender can

1   foreclose on the house, can force sale of the house and take  
2   part of the proceeds to pay back the part of the chunk of the  
3   money that -- or the chunk of money that's still owing on the  
4   loan.

5           So mortgages, a loan, and a lien. And Simon Klevansky  
6   will explain to all of you how it is that a lender perfects its  
7   lien, which is to say that the lender records the lien with the  
8   Bureau of Conveyances, an office in the state of Hawaii. Now,  
9   this background is important 'cause it will give you some  
10   insight as to Anthony Williams's scheme. Anthony Williams  
11   claimed that a UCC filing statement -- excuse me -- a UCC  
12   financing statement or UCC lien and an MEI mortgage could  
13   discharge a homeowner's loan with an existing bank. That is  
14   false. As the evidence will show, a mortgage is merely a loan  
15   protected by a lien. One cannot just file a second lien and  
16   discharge one's loan to another lender.

17           A person can't borrow \$500,000 from a bank, take a house  
18   with -- and get a house with a mortgage, and then discharge the  
19   mortgage by running to the Bureau of Conveyances, filing a  
20   document that says My lien is now discharged, and then walk off  
21   scot-free. But that is the essence of Anthony Williams's MEI  
22   program. The evidence will show that only the lender can  
23   discharge a loan. Only the lender can discharge or release a  
24   lien. A borrower can't do it and certainly not a third party  
25   like Anthony Williams and MEI.

1           Simon Klevansky, the government's expert, will also walk  
2   you through why the UCC financing statement prepared by Anthony  
3   Williams and MEI was a fraudulent document. You will see that  
4   the UCC financing statements that were filed on behalf of the  
5   homeowners listed the homeowners as both the secured party and  
6   the borrower. In other words, the homeowner was putting a lien  
7   on his or her own house. That does not discharge one's loan.  
8   And the UCC documents say at the bottom that the  
9   lender -- excuse me -- that the homeowner's mortgage was being  
10  discharged, which is a false statement.

11           The evidence will also show that the MEI mortgage  
12  documents prepared by Anthony Williams's company MEI was  
13  fraudulent. One of the parties that's listed on the MEI  
14  mortgage documents is a fake company who represents or purports  
15  to be a trustee, and there is no trust. And the MEI document,  
16  the evidence will show, lists as one of the secured parties  
17  MEI, although MEI loaned no money.

18           So why is it that the homeowner victims bought into this  
19  program? Why did they believe Anthony Williams? Well, first,  
20  he came across as credible. He called himself private attorney  
21  general, seemed to have a badge. They all believed he was an  
22  attorney.

23           But also, it's because Anthony Williams and MEI actually  
24  recorded these documents at the Bureau of Conveyances. What  
25  we're going to call to testify before you, the head of the

1 Hawaii Bureau of Conveyances, Les Kobata, who's the registrar.  
2 And Les Kobata will testify and will explain to you all that  
3 you can make any representation in a UCC filing statement.  
4 That doesn't make it true. The Bureau of Conveyances does not  
5 exist to verify documents and the accuracy of documents that  
6 are filed with the Bureau of Conveyances. It exists only to  
7 provide public notice of interest in property.

8 The government is also going to present the testimony of  
9 Jim Evers of the Office of Consumer Protection. Jim Evers will  
10 testify that his office filed an action in the U.S. Bankruptcy  
11 Court to declare all MEI mortgages and UCC liens invalid and  
12 unenforceable, and you will see that order.

13 Now, Anthony Williams's scheme also depended upon the  
14 homeowners believing that he was entitled to take the actions  
15 that he was, that he could, in fact, modify their mortgages or  
16 discharge mortgages and that he could practice law. We will be  
17 calling to testify the regulatory agency or representative from  
18 the regulatory agency that oversees mortgage brokerages and  
19 mortgage service providers. That is the Hawaii Division of  
20 Financial Institutions. The director is Iris Ikeda. Ms. Ikeda  
21 will testify and tell you all that Anthony Williams was never  
22 licensed as a mortgage broker or a mortgage service provider  
23 here in the state of Hawaii and nor was MEI.

24 You will also hear from Pat Mau-Shimizu of the Hawaii  
25 State Bar Association, and Ms. Mau-Shimizu will tell you that

1 Anthony Williams was never licensed to practice law in the  
2 State of Hawaii.

3 Now, once you've heard from those agency witnesses, the  
4 government will present to you the testimony from witnesses  
5 that are associates of Anthony Williams or once were. We will  
6 be presenting his employees of Common Law Office of America  
7 which purported to be Anthony Williams's law firm. We will be  
8 calling to the stand Mary Jean Castillo. Mary Jean Castillo  
9 was recruited by Anthony Williams to recruit herself, to refer  
10 others in her community into the MEI program. Ms. Castillo  
11 will also testify that all MEI clients got the same UCC  
12 financing forms and MEI mortgage documents.

13 You will also hear from Henry Malinay and from Anabel  
14 Cabebe. These are two people that Anthony Williams relied on  
15 to refer clients from their community here in Hawaii. Henry  
16 Malinay and Anabel Cabebe will testify that they were actually  
17 once clients of Anthony Williams, and that at some point they  
18 realized that the system was not really on the up and up, but  
19 they nonetheless referred people to this -- to the MEI program.

20 Finally, the government will be calling representatives  
21 from the banks and the mortgage service companies themselves.  
22 These representatives will testify that the homeowner victims  
23 that you will have heard from by then were all making payments  
24 on their mortgages in the summer of 2013. Some were completely  
25 current, some were relatively timely, but a little behind, but

1 they were making payments. And then you're going to hear that  
2 all of the homeowner victims abruptly stopped making payments  
3 in or around the summer and fall of 2013 time period. And you  
4 will hear from the bank and mortgage service company  
5 representatives what they did when those homeowner victims  
6 stopped making payments. The banks foreclosed. Some of those  
7 homeowner victims were able to modify their loans on more  
8 unfavorable terms. Others lost their homes, and you'll be  
9 hearing from them.

10 So that's the gist of the government's case. Let's talk a  
11 little bit about the superseding indictment.

12 At the close of evidence, you're going to hear detailed  
13 legal instructions from the Court. For the time being, I just  
14 want to preview for you broadly the elements that you're going  
15 to be asked to decide.

16 Wire fraud and mail fraud have four elements and they're  
17 overlapping. First, the government will prove the defendant  
18 knowingly participated in and devised or devised a scheme or  
19 plan to defraud or a scheme or plan to obtain money from others  
20 by way of fraudulent pretenses, representations, or promises.

21 Second, we must show that Anthony Williams's statements  
22 were material, which is to say they had a tendency to make  
23 people want to give him money.

24 Third, that Anthony Williams acted with an intent to  
25 defraud.

1           And fourth, that Anthony Williams used or caused to be  
2   used interstate wires or the U.S. mails to carry out an  
3   essential part of that scheme.

4           So the evidence will show in the government's  
5   case-in-chief that the defendant promised mortgage debt relief  
6   to the homeowner victims through the use of these bogus UCC  
7   financing statements and MEI mortgages, and he promised that  
8   these documents would discharge their mortgages.

9           The MEI mortgage statement itself or mortgage had false  
10   representations about companies that did not exist. They made  
11   false representations themselves about how the homeowner's  
12   mortgage would be discharged.

13          Anthony Williams also made representations that he was an  
14   attorney and that he could represent people in court if the  
15   banks ever tried to come after him.

16          The government will prove that Anthony Williams's  
17   statements were material, second element. The homeowner  
18   victims will all testify that they believed Anthony Williams  
19   and it was because of Anthony Williams's statements that they  
20   stopped paying their mortgages or their mortgage payments to  
21   their current lenders and that they started paying MEI.

22          The government will prove that the defendant acted with  
23   the intent to defraud. Here the document itself will show the  
24   fraud. The MEI mortgage has a fake company on it with the fake  
25   party. And Anthony Williams, who represented himself as



1 someone who could defend others in court, was actually told  
2 that he couldn't represent people in court. He once tried to  
3 represent one of the very homeowner victims -- actually one who  
4 became complicit, Henry Malinay, and tried to sue someone in  
5 connection with a foreclosure action, and we will present  
6 evidence that he tried to sue in this court, in the federal  
7 court of Hawaii, just across the hall. And the judge in that  
8 action, Judge Susan Oki Mollway, issued an order telling him  
9 that what he was trying to do was the practice of law and that  
10 he could not do that without a license. Anthony Williams still  
11 continued with his scheme, representing to people that he could  
12 represent them in court. He acted with the intent to defraud.

13 Finally, the government will prove through the testimony  
14 of Special Agent Crawley that the defendant used or caused to  
15 be used wire communications and the U.S. mails to carry out an  
16 essential part of the scheme. Anthony Williams, his  
17 associates, some of the victims, they communicated using email  
18 over the internet. Some of his associates wire transferred  
19 money that derived from this scheme, and you will hear how some  
20 of the victims mailed their checks to MEI to an associate of  
21 Anthony Williams's in Texas.

22 So those are the four elements that the government will  
23 prove over the course of its case-in-chief.

24 So just a couple last concluding remarks that I'd like to  
25 make before I leave you. First, with respect to how the

1 government's case-in-chief will progress, the government will  
2 be presenting its evidence, as noted, through the testimony of  
3 witnesses. That testimony will come in piecemeal. It's not  
4 going to be necessarily in the narrative linear fashion, like  
5 you're watching a movie with a beginning, middle, and end.  
6 Some of the stories of the homeowners will require two or three  
7 witnesses to get out to understand what happened, and the  
8 effect of what happened to the homeowners, you're really going  
9 to have to hear from the homeowner. But also you will have to  
10 hear from the CLOA associate and also from the lenders and the  
11 service providers themselves.

12         So we ask you to keep an open mind until you hear all of  
13 the evidence and certainly all the evidence provided in the  
14 entire case.

15         The other thing to consider as you listen to the evidence  
16 at this trial is who's the victim and how were they victims?  
17 This is an important point because you're going to see a  
18 variety of individuals and homeowners over the course of this  
19 trial. You'll hear from some homeowners that believed Anthony  
20 Williams, bought into the MEI system, and then realized it was  
21 fraudulent. You're going to hear from other homeowners who  
22 heard from Anthony Williams, believed him, bought into the MEI  
23 system, and realized it was fraudulent, and then joined in.

24         You're also going to hear from other homeowners who bought  
25 into the MEI system who may not have ever realized that it was

1 fraudulent. But they all have one thing in common: They all  
2 believed Anthony Williams.

3 So that's a brief summary of the government's  
4 case-in-chief. At the conclusion of the evidence, the  
5 defendants will certainly have -- defendant, rather, will have  
6 an opportunity to present evidence. He doesn't have an  
7 obligation to do that. But once all evidence has been  
8 presented to you, one of us will come back before you and we  
9 will ask you to return a verdict, and a verdict of guilty on  
10 all 32 counts in the superseding indictment.

11 Thank you.

12 THE COURT: All right. Very good.

13 Yes. Could you did that? And then do you need the  
14 special microphone -- the lapel microphone? All right. We'll  
15 get that set up.

16 Before you start, Mr. Williams, is anyone having any  
17 problems with their -- seeing the document on the iPad? And  
18 just raise your hand if you have any problems and then we can  
19 also swing the big screen over if it becomes difficult. And  
20 then is the hearing assistance good? All right. Thank you  
21 very much.

22 All right. Mr. Williams, at your leisure, you have  
23 40 minutes.

24 THE DEFENDANT: Good morning, ladies and gentlemen.  
25 Everything that the prosecutor stated is an absolute lie.

1 What the evidence is going to show is that I was very  
2 transparent with my business. I actually got the documents  
3 that he's claiming to be false approved by the government. I  
4 actually have video evidence of me going to the governmental  
5 agencies and getting these documents approved by the government  
6 to make sure there was nothing fraudulent in the  
7 government -- in the documents that I presented for my clients.  
8 They know this.

9 This case is not about me committing fraud. This case is  
10 about me exposing the fraud of the FBI and the banking system  
11 against innocent homeowners. He claimed that I was a -- I  
12 preyed on homeowners in Hawaii. I did not prey on homeowners  
13 in Hawaii. I was contacted by homeowners in Hawaii after  
14 viewing my videos on YouTube of me saving people's homes from  
15 foreclosure, me and my private attorney general team running  
16 sheriffs off of people's property that was trying to convict  
17 them unlawfully without a trial by jury which is their  
18 constitutional right according to the Seventh Amendment.

19 Now, he talks about the fraud. Now, this summary chart is  
20 going to tell you about some employees that I had hired when I  
21 came to Hawaii. I was new to Hawaii, didn't know these people.  
22 I trusted the people that introduced me to these people that  
23 these people were honest people, and I hired these people to  
24 assist me in helping the homeowners here.

25 One of the persons was Edna Franco, she was the main

1 culprit, Hep Guinn, and also who he just talked about was Henry  
2 Malinay. Now, Mr. Malinay, what him and Edna Franco did behind  
3 my back with two other people, they flew to California, opened  
4 up a copycat company, named it similar to mine. My company is  
5 named Mortgage Enterprise Investments; they named their company  
6 Mortgage Enterprise to make it appear that it's the same  
7 company. So they used my company's reputation for helping  
8 homeowners and they scammed a lot of people here.

9 I was unlawfully incarcerated by the FBI and the State of  
10 Hawaii and the State of Georgia. These are a chart of some of  
11 the charges that I have been unlawfully charged with in the  
12 course of me assisting people in their homeowners, fighting  
13 foreclosure while fighting criminal cases: criminal  
14 impersonation of a police officer. He had mentioned that I  
15 have a badge. Yes, I have a badge that says Sovereign Peace  
16 Officer. I actually have handcuffs. I have a gun. I have a  
17 Private Attorney General ID badge.

18 You will see the facts in evidence that's going to be  
19 presented in this case that not only is the badge, the  
20 handcuff, and the ID its valid, I went through TSA, the  
21 airport, with this badge, with these handcuffs, and with this  
22 ID and boarded planes flying all over the United States with  
23 this badge ID. Not once was I told I could not use this badge,  
24 I could not fly with this badge. You will see video evidence  
25 of me flying, going through TSA, presenting my Private Attorney

1 General ID, and flying on the plane back and forth through the  
2 United States. I was never charged with presenting a fake ID  
3 in any federal building. You will also see evidence of me  
4 going to the FBI office, presenting my Private Attorney General  
5 ID, and they accepting it and allowing me in their building.

6 The FBI office here, I went to the FBI office after I  
7 discovered what my former employees did and made a complaint, a  
8 formal criminal complaint against these former employees for  
9 what they did, the lies that they told some of the homeowners,  
10 which he said they told the homeowners that their mortgage  
11 would be discharged by the filing of the UCC. I never taught  
12 them that. I never approved that, and that's a lie. I never  
13 told them that.

14 Now, in the charge you'll see on here rape and child  
15 molestation. I was charged with that charge in 2013 by the  
16 FBI, the State of Hawaii, and the State of Georgia. The reason  
17 I was charged with that is to get me out of Hawaii to stop me  
18 from helping homeowners. The FBI went so far as to fake my  
19 fingerprints to try to make me the culprit that committed this  
20 heinous crime. I represented myself and I won my case because  
21 I showed the evidence that I wasn't the perpetrator of this  
22 crime. I wasn't even in the state to commit the crime. But  
23 yet they still charged me with this to get me out of Hawaii  
24 from assisting these people from being in foreclosure.

25 Now, he said the documents. Now, you are going to see the

1 documents as they are presented into evidence that there's  
2 nothing fraudulent about the documents. I had these documents  
3 already preapproved by the government. One of the governmental  
4 agencies is called the Anti-Predatory Lending Database. Now,  
5 this agency is in the state of Illinois. Now, in the state of  
6 Illinois it's a little different than Hawaii. Hawaii you can  
7 just go down to the Bureau of Conveyance, you can file  
8 basically any document. They're not going to scrutinize it.  
9 So like he said before, they're not going to check the validity  
10 of the document here. They're just gone -- you present it and  
11 they will file it.

12 But in Illinois they are not going to do that. In the  
13 state of Illinois when you present a mortgage or any type of  
14 document to be filed, it has to go through the Anti-Predatory  
15 Lending Database. What the Anti-Predatory Lending Database  
16 does, it scrutinizes your document. It looks for predatory  
17 lending language. It looks for any type of fraudulent wording.  
18 It looks for anything that would be adversely affected to the  
19 homeowner. Before it gets filed in the county recorder's  
20 offices, it has to go through this governmental agency.

21 Once it is scrutinized -- they not only scrutinize the  
22 document, but they actually scrutinize the company. So once  
23 they scrutinize the document and the company, they issue you  
24 what is called a Certificate of Exemption which means that  
25 they've already scrutinized the document, they scrutinized the

1 company that files the document and that there was nothing  
2 fraudulent about the document, and then they file that  
3 document.

4         These are the agencies that I had to go through to get the  
5 mortgage that I filed -- filed and approved to be filed, the  
6 UCC that was filed -- to prove to be filed. Now, you gonna see  
7 a difference between the UCC that I had my client file and the  
8 UCC that my former employees fraudulently filed because they  
9 didn't really understand what the UCC was for. And you will  
10 see that MEI was not the secure party creditor on any of the  
11 clients' home. That was never the intention. My business has  
12 always been transparent.

13         What they won't present is clients that they said they  
14 gonna call? None of them clients made a complaint against me.  
15 Matter of fact, the complaints that they made was against Henry  
16 Malinay, against Edna Franco, against Hep Guinn, Rowena Valdez  
17 whom they never charged even after I made a complaint, even  
18 after I had numerous homeowners that got scammed and fraud by  
19 them made a complaint, they still never filed any charges  
20 against them. They filed the charges against me.

21         Now, your question should be Well, why did they charge  
22 charges against you and not the people that actually did it?  
23 Well, in my investigation here in Hawaii, I was exposing not  
24 only corruption by the mortgage companies, but I was exposing  
25 corruption by the prosecutor's office, the law enforcement



1 agencies, and the judges here.

2 MR. YATES: Your Honor, we have a motion in limine  
3 regarding malicious prosecution and selective prosecution.

4 THE COURT: Right. We've already ruled on that.  
5 You're not permitted to go into that area. Move on, Mr. --

6 MR. WILLIAMS: No, I understand. What I was  
7 exposing, this is what they -- why they came after me.

8 THE COURT: Move on, Mr. Williams. I've already  
9 ruled on this. Go on to another area.

10 THE DEFENDANT: You will also see evidence that the  
11 DCCA, which he had enumerated and mentioned, James Evers, James  
12 P. Evers, you gonna see a memorandum that this agency here from  
13 the DCCA, that's Department of Consumer -- Consumer Affairs, he  
14 made a memorandum that outlined who the culprits were in Hawaii  
15 that scammed the homeowners. Not once -- not one homeowner  
16 made a complaint against me because I was always honest, I was  
17 always up front, and I let the people know what their rights  
18 were.

19 Now, the people that actually scammed them, they -- James  
20 Evers actually did a memorandum showing that how they tricked  
21 the homeowners, how they actually flew to California. And he  
22 even mentions in the memorandum that they formed a copycat  
23 company and stole my documents, 'cause what they did, they took  
24 my application, took the name Investments off, and then started  
25 signing up customers as if they had signed up with my company.

1           So when customers would go online and they'd look up  
2   Mortgage Enterprise Investments and they'd see my Better  
3   Business Bureau rating which is A-plus so they would be  
4   confident in that company thinking that it's mine when it  
5   wasn't and they knew that. And so he did the memorandum and a  
6   bankruptcy hearing against Malinay and Anabel Cabebe which are  
7   two of the people that they're claiming that were former  
8   employees which I end up firing. I fired them because after I  
9   found out what they did, I immediately fired them.

10          I sent a letter to the DCCA regarding them committing  
11   fraud and I followed it up twice in person. So you will be  
12   able to see this letter that I actually sent to the DCCA  
13   specifically talking about what these former employees did. I  
14   sent them a list of the homeowners that they actually  
15   defrauded. I sent them the names and their telephone numbers  
16   so they could contact them and verify it.

17          These same people that they defrauded, I actually have  
18   affidavits that will presented to you so you could see the  
19   affidavits that they filed against these people that used my  
20   good name and my company's good name to defraud people and made  
21   people think it was my company. And then the FBI used that as  
22   a premise to bring charges against me, but it was because of  
23   all the YouTube videos that I put up.

24          Now, he mentioned that I go in court and I represent  
25   clients in court. Yes, I do. I been doing that for the last

1 17 years in 8 states. Never have I been charged with  
2 unlicensed practice of law with the exception of the state of  
3 Florida which is like the state of Hawaii, because I had to  
4 remove several judges by filing federal lawsuits against them.  
5 And you will see during the course of this case that the only  
6 reason the state of Hawaii and the state of Florida went after  
7 me is because I was exposing the corruption of the banks in  
8 complicity with the court system in Florida and Hawaii.

9       So when you see the evidence, it's going to be  
10 unmistakable that I had the most transparent policy of any  
11 company ever. Before I would file any document with the court,  
12 before I would file any document with the bureau, I would send  
13 a copy to the FBI, I would send a copy to the Department of  
14 Justice with an open letter. You gonna see that on all the  
15 letters that I'ma present into evidence, that everything that I  
16 did I wanted to make sure that the FBI knew, I wanted make sure  
17 the Department of Justice knew, I wanted to make sure the DCCA  
18 knew that everything that I was doing was lawful and according  
19 to the law. I made sure before I made any move. I ran it by  
20 the FBI. I made sure that I got all the documents approved,  
21 make sure that it was nothing that could be construed even in  
22 the language of the documents that it was fraudulent or  
23 anything like that.

24       Now, you gonna see on the counts they going to have on the  
25 counts, they got 15 counts of wire fraud, which are actually

1 emails, 13 of them are emails, 2 of them are MoneyGrams. Now,  
2 what they didn't tell you is that they indicted my 72-year-old  
3 mother. They indicted her for the same charges that they  
4 charged me, and they did that as a tactic against me. So in  
5 order to hurt me the most, you gonna charge my 72-year-old  
6 mother for receiving lawful funds from my bank account, my  
7 business bank account that was nothing fraudulent about it.

8 Now you will see that in Megan Crawley's investigation,  
9 you gonna see the search warrants that they had got approved by  
10 the magistrate judge. She got search warrants approved for  
11 money laundering and bank fraud. So what they did is went  
12 through all of my bank accounts here, Texas, California,  
13 Florida, looking for money laundering and bank fraud. Couldn't  
14 find none. Couldn't find any type of fraud anywhere.

15 So the only thing they could do is, Well, he lied through  
16 the email. He made misrepresentations to clients, which they  
17 note that there was no misrepresentation. You will see the  
18 actual emails and you will see the actual clients that they  
19 even have as witnesses. When they get up to testify, I'm going  
20 to question them on those emails and they gonna tell you that,  
21 No, there was nothing fraudulent about what Mr. Williams told  
22 me. Mr. Williams was always up front with me. Mr. Williams  
23 was always honest with me. Mr. Williams -- the application  
24 that they signed, I took my time to go through each document  
25 that every client signed and made sure they understand it.

1           Now, he said that the clients were up on their payments.  
2   Most of the clients were not. Most of the clients that came to  
3   me were already in foreclosure. Most of them at that point had  
4   already got a judgment to get kicked out when I got involved.  
5   And when I got involved, I was able to stop the foreclosure,  
6   keep these people in their homes. And lot of these people are  
7   elderly people. I had clients that were 70, 80 years old  
8   getting ready to get kicked out on the street and from a bank  
9   that was committing fraud against them with predatory lending,  
10   filing documents.

11           And I'm gonna show you today, during the course of this  
12   case, the documents that were being filed by the bank are  
13   fraudulent. They have fraudulent signatures. They had  
14   robo-signers. They had people that on CBS -- CBS did a actual  
15   2-hour special on the fraud that's being perpetrated against  
16   all homeowners with the assignment of mortgages. I showed that  
17   even the CBS special that they did on *60 Minutes*, that the same  
18   people were on the same assignment of mortgage in my clients'  
19   cases. So I would file on behalf of my client in the case that  
20   this is fraud, you cannot foreclose by using a fraudulent  
21   document. And you gonna see some of my expert witnesses that's  
22   going to come and basically explain to you what the fraud is  
23   that's being perpetrated against all homeowners.

24           Now, if you're a homeowner, you really want to pay  
25   attention to this case because if you're a homeowner, one thing

1   that you didn't do when you filed -- when you signed up for  
2   your mortgage, you didn't read that mortgage document. I  
3   guarantee you didn't. What you did, you had a closing, you  
4   signed, and they say Signature here, sign, sign here, sign,  
5   initial here, and that's all you did. You never read the  
6   mortgage document.

7           What I did for my clients, I went through that mortgage  
8   with them and showed them how the mortgage document was  
9   actually written and how the fraud was committed against them.  
10   One of the documents that will be presented is the mortgage  
11   note that if you signed a mortgage, you had to sign a mortgage  
12   note.

13          I'ma show you the evidence that that mortgage note  
14   actually paid for the house. So when you signed that mortgage  
15   note, the bank didn't tell you that that note is actually a  
16   negotiable instrument. That's why it's called a promissory  
17   note. If you look at the money that they give, they call  
18   Federal Reserve notes, that's note, that's a negotiable  
19   instrument. But what the closer didn't tell you was that after  
20   you signed is note, they take a stamp from the bank, they stamp  
21   paid to the order of themselves. So they pay to the order of  
22   themselves and they deposit that in their bank.

23          So one of the documents you gonna see is a first request  
24   for admissions that I filed on behalf of my clients to the  
25   banks. And one of the questions that I asked the banks is

1    this:  If you lent my client this money, say, on October 17,  
2    2012, all I'm asking you to do is provide your bank statement,  
3    your ledger that showed that your company deducted this amount  
4    of the loan to pay for this house for my client to be in there.

5           In 17 years not one bank has been able to provide that  
6    documentation, not one.  On your mortgage document -- it's  
7    going to be either on No. 10 or the letter M -- it has mortgage  
8    insurance.  What you as a homeowner don't know is that your  
9    mortgage payment consists of four elements.  It's the  
10   principal, the interest, the taxes, and the mortgage insurance.  
11   You probably never had anybody even explain to you what  
12   mortgage insurance is.  But when you go home and read your  
13   mortgage, I want you to read what mortgage insurance is, and  
14   this is what it's going to say:  Mortgage insurance is  
15   insurance placed on the loan in case you as a homeowner default  
16   on the loan.  So once you stop making that payment or you can't  
17   make that payment for three months, the banks file for the  
18   mortgage insurance payment that you're paying the premium for.  
19   So now, what they've already got paid with the note that you  
20   filed, now they fixing to get paid with the insurance that they  
21   placed on the mortgage that you made the premium for.  So now  
22   they've gotten paid twice for that mortgage.

23           Now, if you can't catch up the payment, what happens?  
24   Your house goes into foreclosure.  Now they file a notice of  
25   foreclosure.  Most people don't know what to do, and you gonna

1 see a lot of my clients what they did before they came to me,  
2 they hired attorneys at law who took them for their money,  
3 charged them 25-, 30,000, 50,000, \$60,000, didn't do anything,  
4 still went into foreclosure. When they're at their last end,  
5 then they researching on the internet for someone that can help  
6 them. That's when they find me. That's when I fly here to  
7 file the motions to stop the foreclosures.

8       So once I get involved, most of the clients were already  
9 in foreclosure, already had hired attorneys at law, and lost.  
10 So you gonna hear testimony from clients right now that was in  
11 foreclosure since 2013 -- 2013, already had a final judgment,  
12 and because of my actions they are still in their home right  
13 now. They haven't been kicked out because of the documents  
14 that I filed.

15       Now, he said that I claimed to be an attorney. I never  
16 claimed to be an attorney at law. I do not want to be attorney  
17 at law. I'm not a member of the bar association, neither do I  
18 ever want to be; that's on my website. I told every client  
19 that I met that I'm not an attorney at law, I'm not a member of  
20 the bar association, but I can go into court and I can assist  
21 you, and I give them the U.S. Supreme Court rulings. One of  
22 the Supreme Court rulings that you'll be able to see that I'ma  
23 present into evidence is *Schwartz v. Board of Examiners, NAACP*  
24 *v. Button, Johnson v. Avery, Gideon v. Wainwright*. All of  
25 these are Supreme Court cases that says that laymen can assist



1 other people in court without being a member of the bar  
2 association and without being charged with unlicensed practice  
3 of law. This is why the State of Hawaii has never charged me  
4 with the unlicensed practice of law because they know the law.  
5 They know I don't have to be a part of the bar association to  
6 assist people in court.

7       What I do, I get a power of attorney. I know you all  
8 should be familiar with how a power of attorney works. Someone  
9 gives you the power of attorney and then whatever they could  
10 do, you can act on their behalf. So all my clients sign a  
11 power of attorney so I can look after their affairs and protect  
12 their property interest.

13       And that's the bulk of the case, that everything that I  
14 did, you gonna see that I was transparent. I was so  
15 transparent that when I could go to court, I would have it  
16 videotaped. You gonna see me in court in different courts in  
17 front of the judge, representing clients and not being ran out  
18 of the court, but being allowed to assist those clients because  
19 that judge knew what the law was, that I did not have to be a  
20 part of the bar association or I did not have to be an attorney  
21 at law.

22       But what I am is a Private Attorney General, but they  
23 don't try to recognize that I'm a Private Attorney General.  
24 But I have an ID, I have a certification, an affidavit, and I  
25 have an oath that's been filed in the Secretary of State's

1 office as a Private Attorney General.

2 You will see during this case I'ma present evidence that  
3 the FBI recognizes me as a Private Attorney General.  
4 Headquarters FBI send me letters addressed to me as Private  
5 Attorney General Anthony Williams. You will see documents from  
6 the Supreme Court of the State of Florida address me as Private  
7 Attorney General Anthony Williams. So, yes, ladies and  
8 gentlemen, I am a private Attorney General. I am not an  
9 attorney at law, neither do I want to be attorney at law.

10 I built my Common Law Office of America on honesty and  
11 integrity and transparency, and if I see fraud, then I am going  
12 to file charges and file a complaint. And that's the reason  
13 why I filed a complaint against the FBI. And the reason why  
14 this charge was filed against me is because I filed a lawsuit  
15 against Megan Crawley. I filed a lawsuit against the other FBI  
16 agent that's going to testify here, Joseph Lavelle. I filed a  
17 federal lawsuit against them for fraud because they were in  
18 complicity with the fraud, and after I filed this federal  
19 lawsuit, then they filed these charges against me. And you  
20 will see that and during the case that this case is about  
21 retaliation, it's about malicious prosecution.

22 MR. YATES: Objection, Your Honor.

23 THE DEFENDANT: It's not about --

24 THE COURT: Wait, Mr. Williams. I need to take his  
25 objection.

1 Yes?

2 MR. YATES: Objection, Your Honor. Motion in limine  
3 regarding selective prosecution, malicious prosecution.

4 THE COURT: All right. Sustained.

5 Move on, Mr. Williams.

6 THE DEFENDANT: You will see that I have eight  
7 offices in eight states. I've been in the state of Georgia  
8 since 2002, been in the state of Tennessee since 2009, the  
9 state of Arkansas and Illinois since 2012, state of Hawaii and  
10 Texas 2013, state of North Carolina 2014, state of Florida and  
11 California also 2014, and the state of New York in 2015.

12 In none of these states have I ever been charged with mail  
13 and wire fraud. A lot of these states I have anywhere from 200  
14 to 400 clients and I still haven't had one complaint yet in  
15 17 years.

16 If someone's defrauding people and scamming people, I  
17 don't think they would be in business for 17 years with zero  
18 complaints and they know that. Even here in the state of  
19 Hawaii I still don't have any complaints. All the complaints  
20 were against my former employees that I fired for fraud. And  
21 also you will see that I actually filed a lawsuit against my  
22 former employees for mail fraud, wire fraud, mail tampering,  
23 mortgage fraud, defamation of character, and slander because  
24 they tried to slander my name after I reported them to the FBI  
25 and the DCCA.

1           So you will see all these facts in evidence when you get  
2 to hear my witnesses, how hard I fight. You will see -- you'll  
3 hear the testimony from my witnesses that I'm not like an  
4 attorney at law. Attorneys at law usually work from 9 to 4:30,  
5 5 o'clock. I usually work from 9 A.M. till about 3:00 or 4:00  
6 in the morning for my clients. They don't work like I work  
7 because I take my job serious and I don't appreciate anyone  
8 accusing me of defrauding people when they know I didn't, when  
9 they know I was always honest, when they know I was up front.

10           And you will see through the facts and evidence that there  
11 is no way that these charges should have ever been brought  
12 against me and my beloved mother. They should have never been  
13 brought because all we did was help people.

14           I had mentioned that in 2013 the FBI tried to fake my  
15 fingerprints to send me to prison basically for life for  
16 child -- rape and child molestation. I beat the charges in  
17 nine months and I filed a lawsuit which is still open right  
18 now. But when I filed the lawsuit, that's when a lot of the  
19 clients went into foreclosure, or I couldn't, you know,  
20 basically help them while I was locked up. So a lot of the  
21 clients started mailing their payments to our home office.

22           So what I had them do, I said, "Listen, I cannot help  
23 these people right now while I'm incarcerated. They won't let  
24 me gets the documents so I can respond from jail."

25           So what I had my mother do, everybody that sent their

1 payments, I had her mail back their payments and mail back and  
2 sent a letter to all clients in all the states that, Listen, my  
3 son has been illegally incarcerated. Please do not mail any  
4 payments. If you mail any payments, they will be mailed back  
5 to you. People that's scamming people don't send people's  
6 money back. That's a fact.

7 So all the payments were sent back through my whole time  
8 of incarceration. Once I got out, once I won my case and the  
9 people saw that I was available, that's when I came back and  
10 that's when I started back assisting people.

11 And you will also see -- hear the testimony of my clients  
12 that when they couldn't pay me, I still did the work. I still  
13 showed up for court. I still fought their foreclosure. Even  
14 if they didn't pay me a dime ever, I still fought for them. I  
15 still they want them in their house. And that's what you gonna  
16 see in this case, that all my clients, these people are like  
17 family to me. And you gonna see that throughout the course of  
18 this case that my clients respect me, they love me, and none of  
19 them made a complaint against me.

20 And all the people that Megan Crawley -- you gonna get a  
21 chance to hear her testimony -- all the people that she went to  
22 their houses to try to tell them -- to try to get them to say  
23 anything negative against me, not one of them made a negative  
24 statement, and that's the reason why they don't want me to use  
25 her investigation reports because it's gonna show that out of

1 all the investigation she did, all these people houses she went  
2 who never called her -- by the way, they never called her, they  
3 never made a complaint -- but they took it on themselves to go  
4 around to all my clients and try to say, "Well, you know,  
5 he's -- he's doing this wrong. You know his company's  
6 fraudulent."

7 Like, "Well, nah, I don't think he's fraudulent. He saved  
8 my home, he saved me from foreclosure. This man always did  
9 what he said he was gonna do."

10 So and you gonna see that throughout the course of this  
11 case that my clients trust me because I am trustworthy, that  
12 everything that I do is based on my faith and the heavenly  
13 father. Everything that I do is based on my upbringing the way  
14 my mother raised me to treat the people the way you want to be  
15 treated, and that's how I treated all of my clients.

16 Thank you, ladies and gentlemen.

17 THE COURT: All right. So we have finished now with  
18 the opening statements. I remind you again that Mr. Yates's,  
19 Mr. Williams's opening statements are not evidence but are  
20 there to provide you with a roadmap of what they believe the  
21 evidence will show.

22 So we are going to take a recess at this time, give you  
23 folks a break, and then we'll return. The first witness will  
24 be on the stand when you return to the courtroom.

25 If you could leave your iPads and your notebooks in the

1 courtroom and, of course, don't discuss the case with anyone or  
2 allow anyone to discuss it with you. Don't do any research or  
3 investigate such as Googling. No social media, commenting on  
4 Twitter, or anything about the trial. And of course, don't  
5 read, watch, or listen to any media account, should there be  
6 any.

7 Please rise for the jury. They're excused for 15 minutes.

8 (Open court out of the presence of the jury.)

9 THE COURT: All right. The record will reflect the  
10 jury's no longer present. Everyone may be seated.

11 Mr. Williams, Mr. Yates, are there any matters that we  
12 need to take up before the first witness takes the stand?

13 MR. YATES: Nothing from the government, Your Honor.

14 THE COURT: All right. And so if you would have  
15 your witness ready on the stand when we return. We'll return  
16 at 9 o'clock -- 9:00, is that -- 10 o'clock, I mean.

17 All right. Thank you very much. We're in recess.

18 (A recess was taken.)

19 (Open court out of the presence of the jury.)

20 THE COURT: The record will reflect the presence of  
21 counsel, Mr. Williams, and we're going to have the jury brought  
22 in.

23 MR. SORENSON: Thank you.

24 THE COURT: The witness is on the stand. We're in  
25 recess.

1 (A recess was taken.)

2 MR. SORENSON: Your Honor, how long do you  
3 anticipate us going before the next break?

4 THE COURT: At least an hour and 10 minutes or so.

5 MR. SORENSON: Okay. All right. 'Cause we could  
6 get to the point where I may just look at the Court and say --

7 THE COURT: Yes.

8 MR. SORENSON: -- "This is probably" --

9 THE COURT: That would be helpful.

10 MR. ISAACSON: One moment, Your Honor, if I could?

11 THE COURT: Uh-huh.

12 MR. SORENSON: Your Honor?

13 THE COURT: Yes.

14 MR. SORENSON: Could you instruct the jury that this  
15 is our first time using this system, at least for me, and that  
16 I could be a klutz for a while?

17 THE COURT: Just a general warning.

18 MR. SORENSON: Yes.

19 THE COURT: Sure, like a warning label.

20 MR. SORENSON: You be ready for mistakes, problems,  
21 early computer shutdowns.

22 THE COURT: I don't want to be accused of agism.

23 MR. SORENSON: No, no, Your Honor, please.

24 THE COURT: But I would highly recommend that you  
25 get a teenager to sit with you because I personally find that's



1 the best technique is to get my 16-year-old on all electronics  
2 and --

3 MR. SORENSON: Is he busy?

4 THE COURT: Yeah.

5 MR. ISAACSON: Sorry, Your Honor. I think we're  
6 ready to proceed.

7 MR. SORENSON: And, Your Honor, for the record, we  
8 have provided the relevant exhibits for this witness. They're  
9 in front of her.

10 THE COURT: Great.

11 MR. SORENSON: One more thing, Your Honor. We have  
12 a stipulation on the authenticity of all of these documents  
13 we're going introduce, although we don't have a stipulation as  
14 to admissibility at this point.

15 THE COURT: Okay. At the appropriate time, if you'd  
16 raise that.

17 MR. SORENSON: Okay.

18 MR. ISAACSON: May I address the Court on one  
19 matter?

20 THE COURT: Did you want this on the record? This  
21 is all off the record.

22 MR. ISAACSON: I'll take it on the record, if you  
23 don't mind.

24 THE COURT: All right. So we're back on the record.

25 Mr. Isaacson?

1                   MR. ISAACSON: Your Honor, just -- I talked to  
2 Mr. Yates. So this Court ordered Jencks Act to be produced  
3 prior to trial and I'm -- we're just confirming that has been  
4 done so he doesn't have to ask every witness that question.

5                   MR. SORENSON: Yes, Your Honor. I believe all of  
6 Special Agent Crawley's reports have been turned over in  
7 discovery, and we've gone through other writings and made the  
8 determination that any other writing was simply -- you know,  
9 whether it was an email to send something -- but it was not  
10 going to be related to the subject matter of her testimony.

11                  THE COURT: All right. So for all the witnesses  
12 Jencks has been turned over?

13                  MR. SORENSON: Yes, Your Honor.

14                  MR. YATES: Although I will note that we just ran  
15 some checks and so that we just uncovered this weekend and  
16 we'll be providing that today.

17                  THE COURT: All right. And those -- but that  
18 doesn't have to do with Agent Crawley?

19                  MR. YATES: No, it does not.

20                  THE COURT: Okay.

21                  MR. ISAACSON: Okay. Thank you, Your Honor.

22                  THE COURT: Uh-huh. All right. We're back in  
23 recess.

24                  (A recess was taken.)

25                  (Open court in the presence of the jury.)

1 THE COURT: All right. The record will reflect the  
2 presence of the ladies and gentlemen of the jury, counsel,  
3 Mr. Williams.

4 Mr. Sorenson is calling his first witness. He did ask for  
5 me to convey to all of you that he is skilled in many things,  
6 but technology is not one of them. But he will attempt to do  
7 his best in presenting the evidence through our electronic  
8 document system.

9 All right. So, Mr. Sorenson, you're first witness.

10 MR. SORENSON: Thank you, Your Honor. Your Honor,  
11 for the record, we have called Megan Crawley, special agent  
12 with the Federal Bureau of Investigation to the stand.

13 Good morning, Ms. Crawley.

14 THE WITNESS: Good morning.

15 THE COURT: Have the oath administered to the  
16 witness.

17 **MEGAN CRAWLEY, GOVERNMENT'S WITNESS, WAS SWORN**

18 THE COURTROOM MANAGER: Please be seated.

19 State your full name and spell your last name for the  
20 record.

21 THE WITNESS: My name is Megan Crawley,  
22 C-r-a-w-l-e-y.

23 THE COURT: Your witness.

24 MR. SORENSON: Thank you, Your Honor.

25 DIRECT EXAMINATION

1 BY MR. SORENSON:

2 Q Good morning, Special Agent Crawley. You're  
3 employed by the Federal Bureau of Investigation; is that  
4 correct?

5 A I am, yes.

6 Q And how long have you been so employed?

7 A I've been with the FBI for 11 years and an agent for  
8 5.

9 Q Now, as an FBI Special Agent, what are your duties?

10 A I conduct investigations on behalf of the FBI.

11 Q What types of investigations do you do?

12 A White collar crimes.

13 Q Are you assigned a particular squad?

14 A Yes, I am. I'm in the white-collar crime squad.

15 Q And as a white-collar crime squad investigator, do  
16 you investigate financial crimes involving fraud?

17 A Yes, I do.

18 Q And how long have you been doing that?

19 A Five years.

20 Q All five years?

21 A Yes, sir.

22 Q All right. So in the scope of your duties have you  
23 investigated a great number of fraud cases?

24 A Yes.

25 Q Now, along those lines let me just ask you have you

1    become familiar with an individual by the name of Anthony  
2    Williams in any of your investigations?

3           A        I have, yes.

4           Q        How so?

5           A        We received a couple of calls from state government  
6    offices informing the FBI they had received some complaints  
7    from homeowners relating to Anthony Williams and his company,  
8    Mortgage Enterprise Investments.

9           Q        And based on that information that you got from some  
10   state agencies, did you then commence a federal investigation  
11   of Mr. Williams?

12          A        We did, yes.

13          Q        And was your investigation limited to what was  
14   happening primarily here in Hawaii?

15          A        Yes, that's right.

16          Q        Did you also work with other FBI offices from time  
17   to time with respect to this investigation?

18          A        Yes.

19          Q        But your activities were primarily devoted to what  
20   was happening here, is it fair to say?

21          A        Yes, that's right.

22          Q        All right. Now, Anthony Williams, have you become  
23   familiar with his appearance?

24          A        I have, yes.

25          Q        How so?

1           A       I've seen him in multiple pictures and I conducted  
2   surveillance on Mr. Williams at one point.

3           Q       Okay. And do you see him anywhere in the courtroom  
4   here today?

5           A       I do, yes.

6           Q       Where would that be?

7           A       He's sitting over at defense table to the right of  
8   Mr. Isaacson.

9                   MR. SORENSON: Okay. Your Honor, if the record  
10   could reflect the witness has identified Mr. Williams as the  
11   person she has been investigating.

12                  THE COURT: It shall reflect.

13          Q       (BY MR. SORENSON:) Okay. So you start this  
14   investigation. Mr. Williams, did you determine in your  
15   investigation that he operated or ran any kind of company?

16          A       Yes.

17          Q       And what was that?

18          A       Mortgage Enterprise Investments and we later  
19   discovered another one, Common Law Office of America.

20          Q       Mortgage Enterprise Investments, was that a company  
21   that he worked for or what was -- what was his relationship  
22   with Mortgage --

23          A       He was the owner of MEI.

24          Q       All right. Now make sure I finish my question  
25   because the court reporter will yell at me if we talk over each

1 other.

2 A Sorry. Fair enough.

3 Q So Mortgage Enterprise Investments' his company?

4 A Yes.

5 Q And is it also called MEI?

6 A Yes, it is.

7 Q Now, you mentioned another company; is that correct?

8 A Yes.

9 Q And what was that?

10 A Common Law Office of America.

11 Q And was that also a company affiliated with

12 Mr. Williams?

13 A Yes, it is.

14 Q How so?

15 A It is another company that Mr. Williams owns and it

16 purports to offer legal services.

17 Q In the scope of your investigation, did you

18 determine whether or not any actual real attorneys worked for

19 the Common Law Office of America?

20 A We could not identify any of the associates of

21 Common Law Office of America to be licensed attorneys.

22 Q Now, the activities of Mortgage Enterprise

23 Investments here in Hawaii, did your investigation reveal what

24 kind of activities that they are were doing, what kind of

25 service they offered?

1           A       Yes.

2           Q       And what was that?

3           A       MEI offers a mortgage reduction program to any  
4 homeowners that sign up based on the idea that MEI tells  
5 homeowners that their current existing mortgage is fraudulent,  
6 and so they then assign -- reassign, eradicate the mortgage for  
7 the homeowner if they sign up, and for a fee -- for an initial  
8 sign-up fee and then for a monthly fee payable to MEI.

9           Q       Now, when you said -- you initially stated that "MEI  
10 offers," and that seems to indicate that they are currently in  
11 business offering this service. Does your investigation reveal  
12 that?

13          A       Yes.

14          Q       Okay. Are they currently offering this service in  
15 Hawaii?

16          A       I don't know as of the date of today.

17          Q       Okay.

18          A       I haven't seen any payments from today, but as of  
19 very recently.

20          Q       Okay. So the service they've offered as far as the  
21 charges in this case, what do they -- what dates are relevant  
22 here?

23          A       Roughly between 2013 and 2015 is what our  
24 investigation focused on. Then we indicted in 2017, so we did  
25 see payments come in during that time as well.



1           Q       All right. No activity that you know of since 2017  
2 here?

3           A       No.

4           Q       All right. In the Common Law Office of America, are  
5 they affiliated with MEI in any way?

6           A       Yes, they are.

7           Q       And how so?

8           A       They advertise themselves as the legal arm of MEI.

9           Q       All right. So these two companies are closely  
10 related to each other, is it fair to say?

11          A       Yes, it is.

12          Q       And Mr. Williams is -- did you testify he's  
13 essentially operating each company?

14          A       Yes.

15          Q       All right. In the -- in the scope of your  
16 investigation as far as here in Hawaii, did you -- did it come  
17 to your attention whether or not any particular group was  
18 targeted by MEI and Mr. Williams?

19          A       Yes, I did.

20                   THE DEFENDANT: Objection.

21                   THE COURT: Yes. What's your objection?

22                   THE DEFENDANT: It's leading.

23                   THE COURT: All right. If you have an objection,  
24 you have to stand up; otherwise I'm not going to recognize --

25                   THE DEFENDANT: It's a leading question.

1 THE COURT: All right. And let me look at it.

2 Overruled.

3 Q (BY MR. SORENSON:) Were any particular groups  
4 targeted by Mr. Williams in marketing his -- his loan offer?

5 A Yes, it was.

6 Q And who was that?

7 A We found that a large number of the victims here in  
8 Hawaii were part of the Filipino community, more specifically,  
9 Filipino immigrants who came to the United States in the last  
10 few decades whose primary language was Ilocano.

11 Q Did you speak with any of these individuals?

12 A We did, multiple.

13 Q Okay. And in speaking with them, did you take  
14 notice as to whether any of them had language difficulties --

15 THE DEFENDANT: Objection. Hearsay.

16 MR. SORENSON: Well, we're not asking for the  
17 content, Your Honor.

18 THE COURT: Overruled.

19 THE WITNESS: Yes, yes, they did have language -- we  
20 had some language barriers. We had to get an interpreter for a  
21 few of them.

22 Q (BY MR. SORENSON:) All right. Now in the scope of  
23 your investigation, did you subpoena or acquire any bank  
24 records?

25 A I did, yes.

1 Q What types of bank records were you looking for?

2 A Bank accounts as they relate to MEI and the mortgage  
3 reduction program.

4 Q And would those be bank accounts of Anthony  
5 Williams?

6 A Yes.

7 Q Any other entities that you were looking for bank  
8 records for?

9 A In this particular investigation MEI and Anthony  
10 Williams.

11 Q All right. In the scope of your investigation, did  
12 you come across the name Barbara Williams?

13 A Yes.

14 Q And who was Barbara Williams?

15 A She is Anthony Williams's mother and assists in  
16 operating MEI.

17 Q Okay. And where is she located?

18 A Killeen, Texas.

19 Q And were some of the operations of MEI centered in  
20 Texas as well?

21 A Yes.

22 Q And in the scope of your investigation, did you  
23 determine what role Barbara Williams played with MEI?

24 A Yes, we did.

25 Q And what was that?

1           A       She was listed as the chief financial officer and  
2 through multiple victim interviews we were told that they were  
3 instructed to send payments, their monthly mortgage payments,  
4 to the Killeen PO Box that Mr. Williams opened for the purpose  
5 of MEI business.

6           Q       Okay. So let's talk about the bank records for just  
7 a moment and hopefully we can do so without killing people  
8 here. But could you look at Exhibit No. 701?

9           A       Yes. Okay.

10          Q       Can you identify 701?

11          A       Yes. This is a -- account opening documents at  
12 Extraco bank account in Texas.

13          Q       Extraco bank account, is this a financial  
14 institution?

15          A       Yes, it is.

16          Q       Is that a financial institution that was utilized by  
17 Mr. Williams?

18          A       Yes.

19          Q       And did your investigation reveal that funds or  
20 moneys that were related to his operation here in Hawaii went  
21 into that account?

22          A       Yes, that's right.

23          Q       And do you have the signature page for that account?

24          A       Yes, in this packet.

25          Q       Okay. And do you see the name Anthony Williams on

1 the signature page?

2 A I do, yes.

3 Q And what was the -- if we could, maybe just the last  
4 four digits of the account numbers, what were the last four  
5 digits of the Extraco account or accounts?

6 A Well, there's many pages. One second.

7 Q That's all right. Take your time.

8 A The last four digits were 8678.

9 Q 8678. And that's Extraco, right?

10 A Yes, that's correct.

11 Q And were these accounts all looked at by an FBI  
12 forensic accountant?

13 A Yes.

14 Q And at least some charts were prepared that are  
15 intended for evidence later with respect to those?

16 A Yes, that's right.

17 Q All right. Let me ask you about the next account.  
18 Let's look at Exhibit 714.

19 Oh, Your Honor, let me just do this. I'm going to  
20 move for the admission of 701 at this time.

21 THE COURT: All right. Any objection to the court  
22 receiving 701 in evidence?

23 THE DEFENDANT: No objection.

24 THE COURT: Thank you. It's received. Would you  
25 wish to publish?

1           MR. SORENSON: I don't, Your Honor. I don't know  
2 that it's necessary for these. I think we can move a little  
3 more quickly if we don't.

4           THE COURT: Very good.

5           (Exhibit 701 received into evidence.)

6           Q       (BY MR. SORENSON:) I'll ask you to look at 714, if  
7 you can identify it?

8           A       Yes. This is a Certificate of Authenticity. When  
9 we subpoena for bank records, they will typically -- financial  
10 institutions, for example, will typically provide a certificate  
11 of authenticity along with the records to state that these are,  
12 in fact, authentic records provided by that institution.  
13 That's what we have here from Bank of America.

14           MR. ISAACSON: Excuse me. What exhibit again?  
15 Sorry, sir.

16           MR. SORENSON: That's 714.

17           MR. ISAACSON: 714. Thank you.

18           Q       (BY MR. SORENSON:) And that's affiliated with  
19 Exhibit 715, isn't it?

20           A       Yes, it is.

21           Q       And what is 715?

22           A       715 is a signature card for an MEI bank account.

23           Q       Okay. And what bank is 715 associated with?

24           A       Bank of America.

25           Q       This is a Bank of America account. And what kind of

1 account is it?

2 A A business economy checking account.

3 Q All right. And whose account is it?

4 A It's DBA Mortgage Enterprise Investments, Anthony T.  
5 Williams, sole proprietor.

6 MR. SORENSON: Thank you. Your Honor, at this time  
7 we're going to move for the introduction of 715. I'm not going  
8 to move for the introduction of 714.

9 THE COURT: All right. 715, any objection to the  
10 court receiving it into evidence, Mr. Williams?

11 THE DEFENDANT: No objection.

12 THE COURT: All right. Received.

13 (Exhibit 715 received into evidence.)

14 Q (BY MR. SORENSON:) All right. Let me direct your  
15 attention over to 719. Oh, before I do that, before you go  
16 away from that, let me just get the last four digits of that  
17 account number so we have that in the record.

18 A The last four digits are 9454.

19 Q 9454. Thank you very much.

20 Let's move on to 719. And what is 719?

21 A This is a signature card for a First Hawaiian Bank  
22 account.

23 Q And who is that account associated with?

24 A Anthony Williams.

25 Q Do you have a signature card for that account?

1           A       I do, yes.

2           Q       And has he signed that?

3           A       Yes.

4                   MR. SORENSON: Your Honor, at this time we'll move

5 in 719.

6                   THE COURT: All right. Do we have an account number

7 for that?

8                   MR. SORENSON: Yeah?

9                   THE WITNESS: It's -- the last four digits are 0705.

10                  THE COURT: All right. Any objection to receiving

11 in evidence, Mr. Williams?

12                  THE DEFENDANT: No objection.

13                  THE COURT: Received.

14                   (Exhibit 719 received into evidence.)

15           Q       (BY MR. SORENSON:) Now, 719 was a bank account at

16 First Hawaiian here in Hawaii; is that correct?

17           A       Yes.

18           Q       Right. Let's look at 722. What is Exhibit 722?

19           A       This is a Wells Fargo signature card.

20           Q       Okay. And whose signature is on that?

21           A       It's not signed.

22           Q       Okay. Whose the listed account holder on that?

23           A       Mortgage Enterprise Investments and Anthony

24 Williams.

25                   MR. SORENSON: Your Honor, at this time we'll move



1 in Exhibit 722.

2 THE COURT: All right. What's the account number on  
3 that, last four digits?

4 THE WITNESS: The last four digits are 7677.

5 THE COURT: All right. Thank you.

6 Any objection to the court receiving it in evidence,  
7 Mr. Williams?

8 THE DEFENDANT: No objection. But I just need to  
9 state that my signature is on page 4 of 5 on the exhibit.

10 MR. SORENSON: Thank you.

11 THE DEFENDANT: My signature's there.

12 THE COURT: Thank you for that clarification. 722  
13 is received.

14 (Exhibit 722 received into evidence.)

15 Q (BY MR. SORENSON:) Okay. Thank you. Now in the  
16 context of your investigation, did you execute any search  
17 warrants?

18 A I did, yes.

19 Q Now, at some point you had done enough of your  
20 investigation, is it fair to say, that you drafted an affidavit  
21 in support of a search warrant?

22 A Yes, that's right.

23 Q And what locations were you looking to search?

24 A Initially there were two locations here in Hawaii.  
25 One here in Honolulu on Democrat Street and one in Aiea.

1           Q       All right. Let's talk about that one on Democrat  
2 Street. Is that Democrat Street located just down the road  
3 from here off of Nimitz Highway?

4           A       Yes, that's right.

5           Q       And was that location associated with Mr. Williams  
6 and MEI in any way?

7           A       It was, yes.

8           Q       Please tell the jury what that was.

9           A       We had heard from -- from multiple homeowners who  
10 had signed up with the program that Mr. Williams was --

11                   THE DEFENDANT: Objection. It's hearsay.

12                   THE COURT: All right. You're not -- are you  
13 offering it for the truth of the --

14                   MR. SORENSON: We're not offering for the truth,  
15 Your Honor, just kind of to direct her there. Don't know that  
16 it's gonna be any disputed --

17                   THE COURT: All right. It's part of to explain why  
18 she did her investigation?

19                   MR. SORENSON: Yes.

20                   THE COURT: All right. Overruled on that basis. Go  
21 ahead.

22                   MR. SORENSON: All right.

23           Q       (BY MR. SORENSON:) So you had learned that  
24 Mr. Williams had had some affiliation with that address, is it  
25 fair to say?

1           A       Yes.

2           Q       And based on that, did you believe that there might  
3   be some bank records -- or some records there?

4           A       Yes.

5           Q       And other items?

6           A       Yes.

7           Q       And so what were you looking for when you went  
8   there?

9           A       Records and documents as they related to the  
10   mortgage reduction program.

11          Q       All right. And was there an owner or a lessee  
12   associated with that address?

13          A       Yes. Anabel Cabebe owned the property.

14          Q       And was Anabel Cabebe also involved with  
15   Mr. Williams in marketing this mortgage reduction plan?

16          A       Yes, she was.

17          Q       And did it come to your attention whether or not  
18   Mr. Williams actually lived there?

19          A       Yes. We didn't believe that he lived there. He had  
20   an office. He would sleep there sometimes when he was in  
21   Hawaii, but it was mainly an MEI office space.

22          Q       Okay. So what did you seize when you went there, if  
23   anything?

24          A       Many records and documents as it related to MEI and  
25   the mortgage reduction program and a desktop computer.

1           Q       Now, were you the person or the agent in charge of  
2 the search that was executed there that day?

3           A       Yes, I was.

4           Q       And when you're the person in charge, do you gather  
5 the items that you get and put them into evidence?

6           A       Yes.

7           Q       And so are you familiar with everything that you  
8 took that day?

9           A       Yes, I am.

10          Q       Now, did you seize a computer that day?

11          A       We did, yes.

12          Q       What type of computer?

13          A       It was an Apple desktop computer.

14          Q       And would you recognize it if you saw it today?

15          A       I would.

16          Q       Did you have a photograph taken of it?

17          A       Yes.

18          Q       All right. I'm going to ask you to direct your  
19 attention to Exhibit 1. All right. Do you recognize  
20 Exhibit 1?

21          A       I do, yes.

22          Q       What is that?

23          A       This is the desktop computer we seized at 1604  
24 Democrat Street.

25               MR. SORENSON: Your Honor, at this time we'll move

1 in No. 1.

2 THE COURT: Any objection?

3 THE DEFENDANT: No objection.

4 THE COURT: Received.

5 (Exhibit 1 received into evidence.)

6 MR. SORENSON: Your Honor, I'm going to ask to  
7 publish this, although it won't be for long.

8 THE COURT: All right. You may publish.

9 Everybody able to see that on their iPads? Okay.

10 Q (BY MR. SORENSON:) All right. So that's the  
11 computer; is that correct?

12 A Yes, it is.

13 Q Now, with respect to this computer, when you check  
14 it into evidence, do you put in any kind of request for it?

15 A Yes, we do.

16 Q Is it true that you want to know what's on there?

17 A Yes.

18 Q Okay. And so do you ask forensic computer person to  
19 open it up and look at it and image the hard drive?

20 A Yes, we do.

21 Q And did you do that in this particular instance?

22 A I did indeed.

23 Q And now, when that was done, were you provided with  
24 an exact image of what was on this computer for your  
25 investigation?

1           A       Yes.

2           Q       And did you review -- is that what you used to look  
3 at stuff that comes off the computer?

4           A       Yes. The forensic examiner creates an exact copy  
5 and processes it so we can -- we can view it. It's not a bunch  
6 of 0s and 1s. And then once it's processed and then we can  
7 view it, then I went through the material.

8           Q       Okay. And in going through the material, did you  
9 recover anything?

10          A       Yes.

11          Q       What types of materials did you find?

12          A       Emails and documents relating to MEI and  
13 Mr. Williams.

14          Q       What about any PowerPoints?

15          A       Yes, there was a PowerPoint on the desktop computer.

16          Q       Now, if you could just describe what a PowerPoint is  
17 just in case anybody here doesn't know what that is.

18          A       It's a slideshow presentation with various texts and  
19 graphics to help explain the mortgage reduction program.

20          Q       Now, in the context of the investigation, was -- did  
21 you recover a PowerPoint that was related to Mr. Williams's  
22 marketing of his MEI plan?

23          A       We did, yes.

24          Q       All right. And would you recognize it if you saw it  
25 today?

1           A       Yes, sir.

2           Q       All right. I'm going to ask you to look at  
3 Exhibit 14. Do you recognize Exhibit 14?

4           A       I do, yes.

5           Q       What is it?

6           A       This is a PowerPoint presentation that we identified  
7 on the desktop.

8           Q       All right. And if you could, was this -- is this  
9 PowerPoint presentation dedicated to what appears to be the  
10 marketing of MEI?

11          A       It does, yes.

12                 MR. SORENSON: Your Honor, at this time we're going  
13 to move in Exhibit 14.

14                 THE COURT: All right. Any objection?

15                 THE DEFENDANT: No objection.

16                 THE COURT: Received.

17                 (Exhibit 14 received into evidence.)

18                 MR. SORENSON: Your Honor, may I publish?

19                 THE COURT: You may.

20          Q       (BY MR. SORENSON:) Okay. Now you can probably see  
21 on the screen up there and hopefully members of the jury can  
22 also see as well. But what you're looking at there is what?

23          A       This is the title page of the PowerPoint  
24 presentation.

25          Q       Okay. And it advertises what there at the bottom?

1           A       A foreclosure and deduction of interest program.

2           Q       All right. I'm going to direct your attention to  
3 the second page of this and ask you to read that for the jury,  
4 please.

5           A       (Reading:) "MEI is dedicated to assist homeowners.  
6 We work only with Common Law Office of America customers to  
7 ensure an affordable monthly service payment. We have a rock  
8 solid guarantee in that if we cannot reduce your mortgage  
9 service payment to half of what your current alleged mortgage  
10 payment is, we will completely refund your 3500 to \$5,000  
11 initial set-up fee, no questions asked."

12          Q       Okay. So I've highlighted a little provision there  
13 at the bottom because I want to ask you a question about it.  
14 Was there a guarantee with MEI that payments would be refunded  
15 if the plan didn't work?

16          A       Yes.

17          Q       And the initial set-up fee, could you describe what  
18 your investigation showed about that?

19          A       Yes. So if homeowners would sign up for the  
20 program, they would pay an initial processing fee which we saw  
21 ranged from \$500 to 5,000, and that was just to get into the  
22 program. And then after that, they would be -- they would  
23 start paying a monthly fee to MEI.

24          Q       And the monthly fee, is that described later in this  
25 PowerPoint?



1 A Yes.

2 Q All right. I'm going to direct your attention to  
3 the next page and ask you do you see anybody you recognize  
4 there?

5 A I do, yes.

6 Q Is that Mr. Williams?

7 A Yes. Four of those pictures are Mr. Williams, yes.

8 Q And it states here he's a U.S. Private Attorney  
9 General; is that correct?

10 A It does, yes.

11 Q Did your investigation reveal whether Mr. Williams  
12 was ever affiliated with the United States government at all?

13 A No, it wasn't.

14 Q Did you say, "No, it -- he wasn't"?

15 A He wasn't, excuse me.

16 Q So the investigation did reveal something and that  
17 was that he was not affiliated with U.S. government?

18 A Correct.

19 Q All right. Let me -- let's go on to the next page  
20 here, if you could read that.

21 A (Reading:) "See if you qualify for a mortgage  
22 payment reduction. If you qualify, MEI eradicates your loan  
23 and eliminates your interest rate. This is not debt  
24 consolidation, refinancing, or credit counseling. This is a  
25 unique process that our company has discovered to lawfully

1 assist you in owning your home in the shortest amount of time."

2 Q Now, is the pitch here that the -- your mortgage is  
3 going to be eradicated?

4 A Yes, that's right.

5 Q And that your interest debt would be eliminated?

6 A Yes.

7 Q All right. I'll direct your attention to the next  
8 page. You see up at the right there it says Foreclosure  
9 Crimes; is that correct?

10 A Yes.

11 Q With a set of handcuffs?

12 A Yes.

13 Q And did your investigation reveal that Mr. Williams  
14 from time to time actually wore handcuffs?

15 A Yes, that's right.

16 Q Had them with him?

17 A Carried them, yes.

18 Q But the idea of foreclosure crimes, was that a theme  
19 that you saw in marketing this particular operation to folks  
20 that there were foreclosure crimes occurring?

21 A Yes.

22 Q Okay. This next page, if you could, read that  
23 second sentence.

24 A (Reading:) "Don't let your alleged mortgage company  
25 service your loan when there is fraud involved."

1 Q All right. And keep going.

2 A (Reading:) "Let our trained representatives assist  
3 you in getting the help you deserve and the information  
4 disclosed to you regarding your mortgage. Let us give you a  
5 peace of mind in knowing that your home is secure and being  
6 serviced by the right company with your best interests in mind.  
7 Don't be fooled by others claiming to reduce your mortgage and  
8 are only refinancing or modifying your loan."

9 Q Okay. And the next page states at the top, "Are you  
10 paying a company you really owe a dime to?" Do you see that?

11 A Yes, I do.

12 Q All right. If you could, read this.

13 A (Reading:) "Don't continue to let the alleged  
14 mortgage company defraud you and your family of what is  
15 rightfully yours. With your current alleged mortgage company,  
16 you would pay a 30-year term and at the end of your payment  
17 period you still wouldn't own your home. This is fraud and  
18 deception to the highest level. American homeowners have no  
19 idea of the documents that they signed when closing on their  
20 homes and in some cases is the very reason that some are  
21 unfairly foreclosed on. Don't let this happen to you and your  
22 family. You have a right to know if there was any fraud  
23 involved in your loan process and the servicing of your loan.  
24 In most cases, the party foreclosing has no lawful right to do  
25 so. There are laws that are in your favor, so don't accept

1     that high mortgage payment. Contact our affiliate law office,  
2     Common Law Office of America, and know your rights as a  
3     homeowner, and let them assist you in helping us help you get a  
4     fair deal."

5           Q       Now, in the operation of this operation,  
6     Mr. Williams would advise people that there was the Common Law  
7     Office of America to take care of their legal needs, is it fair  
8     to say?

9           A       Yes, that's right.

10          Q       And indeed, in this Powerpoint we do see some more  
11     of that -- some of that representation later on, don't we?

12          A       Yes.

13          Q       And this idea that -- that homeowners are being  
14     defrauded, is that something you would regularly see in his  
15     pitch?

16          A       Yes, that was a common theme.

17          Q       And would the idea be that if you're being  
18     defrauded, that they should then start paying Mr. Williams  
19     instead of their bank?

20          A       Correct.

21          Q       Okay. All right. I'm going to take you ahead a  
22     little bit here. We're going to go about four pages to the  
23     page marked at the top Application For Service.

24                    Okay. Do you see that?

25          A       Yes, I do.

1           Q       All right.  If you could, just read that top part,  
2   the application process includes what?

3           A       (Reading:)  "An agreement for service package.  This  
4   agreement package is your guarantee that if MEI cannot reduce  
5   your monthly payment by one-half, your initial service fee is  
6   returned."

7           Q       Now, the pitch was that your payment would be  
8   reduced by half, but you paid Mr. Mortgage -- or Mr. Williams;  
9   is that correct?

10          A       Yes, that's right.

11          Q       And what about the term "the length of payment"?

12          A       Yes, that was what homeowners were also told they  
13   would cut in half.

14          Q       Okay.  All right.  We're going to go -- I'm going to  
15   take you to the page marked New Deed of Trust at the top.

16                   Do you see that?

17          A       Yes.

18          Q       Okay.  If you could, read that.

19          A       (Reading:)  "Your new deed of trust or mortgage  
20   servicing agreement puts you in the driver's seat.  You are the  
21   secured party, beneficiary, and your legal fiction entity as  
22   the debtor.  MEI is a secured party and mortgagee.  The alleged  
23   mortgagee on your current obligation never had a meeting of the  
24   minds with you.  If you thought you were getting a mortgage,  
25   you were not.

1           "With the new documents executed by MEI, you have a  
2 meeting of the minds and standing control of your home's  
3 future. No one may foreclose on you. You are not a tenant.  
4 You are the homeowner and as your property is owned by you,  
5 property taxes are alleviated. The previous documents that  
6 were not lawful contracts are void. With the new documents  
7 executed by MEI, you have two signatures, a lawful contract  
8 agreed upon."

9           Q       Okay. So as a part of selling this service, does  
10 Mr. Williams also represent here that "your property's owned by  
11 you and your property taxes are alleviated"?

12          A       Yes, he does.

13          Q       So he's not only to get rid of your mortgage, but  
14 also going to get rid of your property taxes?

15          A       Yes.

16          Q       All right. I'm going to take you to the page marked  
17 at the top Continued Support From CLOA." And if you could,  
18 read this.

19          A       (Reading:) "While you are actively paying a monthly  
20 mortgage servicing fee to MEI and CLOA assisted you in getting  
21 that service, you are part of the Common Law Office of America  
22 family. Your service includes access to the office's services  
23 and assistant should need -- should need arise associated with  
24 the alleged mortgage that CLOA and MEI have assisted you with.  
25 CLOA representatives are knowledgeable in the law and will

1 assist you as best as possible within their abilities. You are  
2 responsible for your own decisions and responsible for your  
3 actions. CLOA will represent you with integrity and honor to  
4 the laws that are inalienable and in your best interests while  
5 you are actively responsible for comprehending the process."

6 Q Is the representation here that CLOA will represent  
7 you?

8 A Yes, that's right.

9 Q Now, the last page I want to ask you about here is  
10 the next page marked Frequently Asked Questions.

11 And Mr. Williams here provides some statements about  
12 the service; is that correct?

13 A Yes.

14 Q And the first one I wanted to ask you about is you  
15 see the representation "CLOA has proven that the legal system  
16 in place is not acting lawfully"?

17 A Yes, I do.

18 Q And was that something that you saw with respect to  
19 the representations as a consistent theme, that the legal  
20 system was not acting lawfully with respect to homeowners?

21 A Yes.

22 Q And down below, I think it starts with -- right  
23 under "What happens to the other documents the pretender lender  
24 servicer filed on my home," what's that first sentence say?

25 A (Reading:) "The new deed of trust rescinds all

1 other documents previously entered through fraudulent means."

2 Q Now, in the scope of your investigation, did you  
3 come -- did it come to your attention that Mr. Williams was  
4 filing documents that claimed or purported to extinguish or  
5 eliminate prior mortgages on a property?

6 A Yes.

7 Q And the term he uses here, "deed of trust rescinding  
8 of the documents," did you see that theme throughout the  
9 evidence -- or the information that you gathered in this case?

10 A Yes.

11 Q Okay. I'm going to direct your attention over to  
12 Exhibit 3. We're going to look at some of the emails. I'm  
13 also going to ask you what count it's affiliated with to help  
14 everybody.

15 All right. Let me direct your attention to  
16 Exhibit 3, Special Agent Crawley. If you could, look at that.  
17 Tell me what it is.

18 A This is an email chain with the most recent email on  
19 top being from Anthony Williams to Barbara Williams, sending  
20 her a user ID and password for the Texas Secretary of State  
21 website where they would fill out the UCC lien for their  
22 homeowner clients.

23 Q Okay. Now, you don't know the content of what  
24 occurred and what was sent in this mailing; is that correct?

25 A For Exhibit 3 it was just an email.



1           Q       Oh, just an email. I'm sorry. Pardon me. Got to  
2 get my voice back.

3                   Exhibit 3 was an email; is that correct?

4           A       Yes, that's right.

5           Q       And it purported to send some traffic about the  
6 receipt of a letter; is that correct?

7           A       I believe that's Exhibit 2.

8           Q       Oh, I'm sorry. Let's go back to Exhibit 2.

9           A       Okay.

10          Q       Let's start over again. The good news is we have  
11 the foundation for 3.

12                   All right. If you could, look at Exhibit 2 and tell  
13 me what that is.

14          A       This is an email chain where Barbara Williams is  
15 mailing Anthony Williams that she received a physical mailing  
16 from him in the mail.

17          Q       And the physical mailing, what was the nature of  
18 that?

19          A       I'm not clear what were the contents of the physical  
20 inside the envelope. What she did was she received an envelope  
21 from Mr. Williams, scanned it, and then sent it in an  
22 attachment in an email.

23          Q       Okay. And this particular exhibit as we look at the  
24 second page back states certified mail to Barbara Williams from  
25 Common Law Office of America; is that correct?

1           A       Yes, that's right.

2                   MR. SORENSON: Your Honor, at this time we're going  
3 to move in Exhibit 2.

4                   THE COURT: Any objection?

5                   THE DEFENDANT: Yes, I have an objection.

6                   THE COURT: Okay. What's your objection?

7                   THE DEFENDANT: It's not the whole email. That's  
8 not everything that was in the email. I need everything that  
9 was sent in that email.

10                  THE COURT: All right.

11                  THE DEFENDANT: 'Cause that's not everything that  
12 was in there. Once they put the rest of the email, then yes, I  
13 want it to come in, but that's not all of it.

14                  THE COURT: All right. Over your objection, it's  
15 received.

16                   (Exhibit 2 received into evidence.)

17                  MR. SORENSON: Okay. Let's look at Exhibit 2.

18                  Your Honor, if we could punish this?

19                  THE COURT: You may.

20                  Q       (BY MR. SORENSON:) Okay. So this is super small.  
21 I'm going to blow it up with my newly-acquired skills.

22                   Okay. This is an email that purports to be from  
23 Anthony Williams; is that correct?

24                  A       Yes, that's right.

25                  Q       And you see his address there,

1     awilliams@usacommonlaw.com. Is that an email address that was  
2     associated with Mr. Williams?

3             A        Yep.

4             Q        And who was hosting that particular email address?

5             A        Gmail or Google.

6             Q        Did you say gmail or Google?

7             A        Yes.

8             Q        Right. And does Gmail or Google have a server here  
9     in Hawaii based on your investigations in the past?

10            A        They do not.

11            Q        Okay. And so an email sent by Mr. Williams from  
12   Hawaii to someplace in Texas, would that travel interstate?

13            A        Yes, it would.

14            Q        And the email states it's to a Robbin Krakauer; is  
15   that correct?

16            A        Yes, that's right.

17            Q        And did you see this name associated with anybody in  
18   particular?

19            A        This name?

20            Q        Yes, any entity?

21            A        Yes. Robbin Krakauer was associated with MEI.

22            Q        Okay. Was she also associated with CLOA?

23            A        Yes, she was.

24            Q        And the email states, "I sent this certified letter  
25   for free," exclamation point; is that correct?

1           A       Yes.

2           Q       All right. And it says, "Private Attorney General  
3 Anthony Williams." Do you see that?

4           A       Yes, I do.

5           Q       All right. Page down, this is the second page of  
6 this exhibit; is that correct?

7           A       It is, yes.

8           Q       And is this the certified mailing that apparently  
9 occurred?

10          A       Yes.

11          Q       And this particular postage, did it come to your  
12 attention that this was not actually valid U.S. postage?

13          A       Correct.

14          Q       And I'm just going to blow this up a little bit.  
15 Okay. So this particular stamp is not a stamp of the U.S. Post  
16 Office; is that correct?

17          A       It is not.

18          Q       And did Mr. Williams then send this mailing without  
19 actually putting U.S. postage on it?

20          A       Yes, that's correct.

21          Q       Did he apparently put his own postage on it?

22          A       Yes.

23          Q       And then later I guess in the email he states, "I  
24 sent it for free," is it fair to say?

25          A       Yes.

1           Q       All right. I'll direct your attention now over to  
2 Exhibit 3. We can finally get to that. What is 3?

3           A       Exhibit 3 is an email chain with the most recent  
4 email being Anthony Williams sending Barbara Williams an email  
5 of the user ID and password so she can go onto the Texas  
6 Secretary of State website and fill out the UCC or financing  
7 statement.

8           Q       And were those UCC liens and financing statements  
9 used here in Hawaii on a regular basis by Mr. Williams?

10          A       Yes. They were recorded at the Bureau of  
11 Conveyances.

12                 MR. SORENSON: All right. Your Honor -- may I -- I  
13 move for the introduction of 3. And may I publish?

14                 THE COURT: Any objection to receiving Exhibit 3 in  
15 evidence?

16                 THE DEFENDANT: No objection.

17                 THE COURT: Thank you. It's received.

18                 (Exhibit 3 received into evidence.)

19                 MR. SORENSON: May we publish, Your Honor?

20                 THE COURT: You may.

21          Q       (BY MR. SORENSON:) Okay. I'm just going to enlarge  
22 this top part here. And this is an email that purports to be  
23 from Anthony Williams; is that correct?

24          A       Yes.

25          Q       Again to Barbara Williams?

1           A       Yes.

2           Q       And the user ID and filing UCC on Texas website is  
3 that something that you saw on a regular basis in this  
4 investigation?

5           A       Yes.

6           Q       All right. Let's look over at Exhibit 4. What is  
7 Exhibit 4?

8           A       Exhibit 4 consists of two emails, both of them from  
9 Barbara Williams to Anthony Williams updating him on homeowner  
10 payments that she received for the month of July 2013.

11                   MR. SORENSON: Your Honor, we move for the  
12 introduction of No. 4.

13                   THE COURT: Any objection to receiving that in  
14 evidence, Mr. Williams?

15                   THE DEFENDANT: No objection.

16                   THE COURT: Thank you. It's received.

17                   (Exhibit 4 received into evidence.)

18           Q       (BY MR. SORENSON:) All right. Now what I want to  
19 do is just go back real quickly so we can associate some of  
20 these exhibits with counts.

21           A       Okay.

22           Q       Exhibit 2, was that associated with a count in the  
23 indictment?

24           A       Yes. Count 2 -- excuse me -- Exhibit 2 is Count 16.

25           Q       Okay. And what about Exhibit 3?

1           A       Exhibit 3 is also Count 3.

2           Q       All right. And Exhibit 4?

3           A       Exhibit 4 is Counts 1 and 2 of the indictment.

4                   MR. SORENSON: Your Honor, may we publish 4?

5                   THE COURT: You may.

6           Q       (BY MR. SORENSON:) Okay. I think you've testified

7 about this. This was from Barbara Williams; is that correct?

8           A       Yes, that's right.

9           Q       And are these the payments that she's updating

10 Mr. Williams on?

11          A       Yes.

12          Q       And were a number of these individuals from Hawaii?

13          A       Yes, they were.

14          Q       Which ones?

15          A       In the top email, numbers 1, 3, and 4, and in the

16 below email numbers 3, 4, and 5, I believe.

17          Q       Okay. And was this associated with any count in the

18 indictment?

19          A       Yes. Exhibit 4 were Counts 1 and 2.

20          Q       Okay. All right. I'll direct your attention over

21 to Exhibit 5. What is Exhibit 5?

22          A       This is an email chain sent -- the first email was

23 sent to Anthony Williams from an assistant of an MEI associate,

24 and the top email is his reply to her.

25                   MR. SORENSON: Okay. Your Honor, we move for the

1 introduction of No. 5.

2 THE COURT: Any objections?

3 THE DEFENDANT: No objection.

4 THE COURT: Received.

5 (Exhibit 5 received into evidence.)

6 MR. SORENSON: Your Honor, may we publish?

7 THE WITNESS: You may.

8 Q (BY MR. SORENSON:) Now, you testified this involved  
9 some questions from a particular individual; is that correct?

10 A Yes.

11 Q With what looks like Mr. Williams's answers to those  
12 questions, right?

13 A Yes.

14 Q So I want to ask you about some of these particular  
15 questions and we'll start with the question and then go to the  
16 answer.

17 The first question, I'm just going to blow it up  
18 here, "When does the client start paying the new mortgage  
19 payment to MEI?"

20 Do you see that?

21 A I do, yes.

22 Q All right. And the answer comes from the top part  
23 of the email, is it fair to say?

24 A Yes.

25 Q All right. I'm going to blow that up. What does he



1 state there?

2 A (Reading:) "The customer usually starts paying 4 to  
3 6 weeks after paperwork is processed. In the Barron's case it  
4 should be September 1st not October 1st. My mom meant  
5 September 1st and put October 1st. Every customer will have an  
6 unpaid balance to their lender 'cause they will no longer pay a  
7 fraudulent debt. Neither will MEI pay it on their behalf."

8 Q And these questions were being sent to Mr. Williams  
9 by a person who was using this particular plan that he had  
10 set -- started here in Hawaii, is it fair to say?

11 A Yes. They were assisting Mr. Williams in getting  
12 word out of the mortgage reduction program.

13 Q All right. I'm going to ask you about No. 2,  
14 question 2, and that is -- if you could read it. Sorry.

15 A (Reading:) "Why wouldn't clients start paying new  
16 monthly mortgage payment until after the whole process is  
17 complete or at least have the new mortgage and note are signed  
18 and notarized stating the new payment and then let the new  
19 payments begin?"

20 Q All right. And the answer?

21 A (Reading:) "Once MEI secures the mortgage through  
22 the UCC and other IRS forms that the reps are not involved in,  
23 then the half payment can be made even before they have their  
24 new mortgage or note filed. There is a lot of proprietary  
25 information that reps aren't privy to and thus will have no

1 knowledge of what goes on between the lender, MEI, and the  
2 IRS."

3 Q And he makes reference to IRS forms; is that  
4 correct?

5 A Yes, he does.

6 Q Did you see any evidence that Mr. Williams filed any  
7 IRS forms related to this?

8 A No, we never came across those records in our  
9 investigation.

10 Q Okay. And the third question.

11 A (Reading:) "I have been getting a lot of questions  
12 about who is MEI and I have regurgitated what it says on their  
13 website. But to get it straight, they are a company that just  
14 services the loan, correct?"

15 Q And the answer to that is?

16 A (Reading:) "MEI is a mortgage and foreclosure  
17 assistance company. How MEI does what it does is not the  
18 customer's concern. The only concern they should have is does  
19 it work and has it worked which we have all the documentation  
20 to prove that it does."

21 Q And is this Mr. Williams instructing one of his  
22 people what to tell people when they're marketing this plan?

23 A Yes. She was getting many phone calls from clients  
24 and was asking what to tell them, and he's instructing her what  
25 to say and what not to say.

1           Q       Did you find evidence that money was from -- money  
2 was from time to time wired from Hawaii to Texas?

3           A       Yes.

4           Q       Related to the operation of this operation?

5           A       Yes.

6           Q       And I'll direct your attention then over to  
7 Exhibit 6. What is 6?

8           A       Exhibit 6 are two wires from Walmart, MoneyGram  
9 wires, sent from Mary Jean Castillo here in Hawaii to Barbara  
10 Williams in Texas using funds from MEI's bank account here.

11          Q       And who is Mary Jean Castillo?

12          A       She was an associate of MEI.

13          Q       All right. And just to go back, Exhibit 5  
14 was -- what was -- what counts was that related to?

15          A       Counts 4 and 5.

16          Q       All right. And Count 6 -- or Exhibit 6, what count  
17 is that related to?

18          A       Count 7.

19                 MR. SORENSON: Your Honor, at this time we move for  
20 the introduction of 6.

21                 THE COURT: All right. Any objection?

22                 THE DEFENDANT: No objection.

23                 THE COURT: Received.

24                 (Exhibit 6 received into evidence.)

25                 MR. SORENSON: We're not going to publish this one,

1 Your Honor.

2 THE COURT: All right.

3 Q (BY MR. SORENSON:) Did your investigation reveal  
4 that a person named Eugene Williams was also involved with  
5 Anthony Williams?

6 A Yes.

7 Q Okay. And how so?

8 A It seemed that Mr. Williams had brought in Eugene  
9 Williams to assist with MEI and Common Law Office of America.

10 THE DEFENDANT: Objection. Not relevant to this  
11 case.

12 THE COURT: All right. So offer of proof as to the  
13 relevance as to --

14 MR. SORENSON: Well, I think the witness testified  
15 that he brought Mr. Williams in to work with MEI. That  
16 certainly makes it relevant.

17 THE COURT: All right. During the relevant time  
18 frame and with regard to the customers in Hawaii?

19 MR. SORENSON: Within the relevant time frame that  
20 we're talking about here and the customers in Hawaii?

21 THE WITNESS: Yes.

22 THE COURT: All right. Overruled.

23 MR. SORENSON: Thank you, Your Honor.

24 Q (BY MR. SORENSON:) This particular email that we're  
25 looking at, No. 7, is dated October 7, 2013; is that correct?

1           A       Yes, that's right.

2           Q       And does it discuss MEI business?

3           A       It does.

4                   MR. SORENSON:  Okay.  Your Honor, at this time we  
5 move for the introduction of No. 7.

6                   THE COURT:  Exhibit 7.  Any objections to receiving  
7 in evidence, Mr. Williams?

8                   THE DEFENDANT:  Yes.  I object because it has  
9 nothing to do with the Hawaii clients here.  That actually had  
10 to do with Florida.

11                  THE COURT:  All right.  Mr. Sorenson, he's objecting  
12 on the basis of relevance.

13                  MR. SORENSON:  Yes, Your Honor.  I think if you  
14 listen to the opening statement of the defendant, he talked  
15 about running this same plan in multiple other states exactly  
16 the same way.  Certainly the PowerPoint we just saw was meant  
17 for national marketing.  So I don't know that there's a  
18 distinction as to whether or not it's just going on here, but  
19 certainly it goes right to his intent in operating this  
20 so-called charge scheme.

21                  THE COURT:  Okay.  Was this at the same time period  
22 as being alleged with regard to the Hawaii clients?

23                  MR. SORENSON:  Yes, Your Honor.

24                  THE COURT:  Is that right?

25                  THE WITNESS:  Yes, it is.

1           THE COURT: All right. So on that basis I'll  
2    overrule. He's showing common purpose and design of the  
3    scheme. All right. So for that purpose it'll be received over  
4    Mr. Williams's objection.

5           (Exhibit 7 received into evidence.)

6           MR. SORENSON: Thank you, Your Honor.

7           Your Honor, may we publish 7?

8           THE COURT: You may.

9           Q        (BY MR. SORENSON:) Now, this is a relatively long  
10   email, but I just want to ask you about certain parts of what  
11   Anthony Williams purportedly says here. Do you see the part  
12   that says "from Anthony Williams"?

13          A        Yes.

14          Q        And I'm going to blow that up. Okay. This is  
15   Eugene Williams that he's writing to; is that correct?

16          A        Yes, that's right.

17          Q        If you could, just read that first few sentences.

18          A        (Reading:) "Bro Elbay, I'm glad to hear that Betty  
19   gave you a referral based on your work for her. This is how I  
20   built my business on word of mouth testimony. I do want to go  
21   forward with you in buying the foreclosed homes from the banks.  
22   Also with the people who are currently in foreclosure, I need  
23   you to send the application packet so you can sign them up to  
24   start receiving your residual income that's going to free up  
25   your time so we can really get to -- really do work of epic

1 proportions in reference to exposing this fraudulent system and  
2 bringing it down and replacing it with one that is truly for  
3 the people and by the people."

4 Q Now, does Mr. Williams discuss here actually buying  
5 foreclosed homes once they are foreclosed upon?

6 A Yes, he does.

7 Q And Mr. Williams also -- does he discuss some Hawaii  
8 business also in this email?

9 A He does.

10 Q Okay. And where is that? If you could direct the  
11 jury's attention to it.

12 A About halfway down in the -- in the paragraph when  
13 he's talking about the -- the monthly residual or the income  
14 that can be received with assisting with the program.

15 Q Okay. And if you could read that part to the jury.

16 A (Reading:) "Within a 3-month time with about 25  
17 homes from there and my program, you should be making about  
18 \$10,000 a month residual. I got a few in Hawaii that's making  
19 25,000 after only four months."

20 Q Keep going.

21 A Oh, I'm sorry. (Reading:) "They don't know half of  
22 what you know, so, you know, you are gonna make way more than  
23 that and you can help more people than you ever imagined. I  
24 know you and I have both helped tons of people for free, but  
25 now we have to be compensated for what we do because there

1   aren't too many that can do what you and I do. I'm looking to  
2   fly you out here hopefully next month, bro. I really want my  
3   staff here to meet you so I can introduce you as a partner in  
4   Common Law Office of America. I have given that status to only  
5   one other person and her name starts with an E also, and that's  
6   Edna. I will explain why you both had to have names starting  
7   with E in order to partner with me."

8           Q       Okay. So do you know the Edna that's being referred  
9   to here?

10          A       I do, yes.

11          Q       And who is that?

12          A       Edna Franco.

13          Q       Is she a person here in Hawaii?

14          A       She is.

15          Q       Does he discuss in this email actually bringing  
16   Mr. Williams -- Mr. Eugene Williams out here to Hawaii?

17          A       Yes.

18          Q       All right. Let me direct you over to Exhibit 8.  
19   What is Exhibit 8?

20          A       Exhibit 8 is another receipt of a MoneyGram wire  
21   sent from Mary Jean Castillo here in Hawaii to Barbara Williams  
22   in Killeen, Texas.

23          Q       And Mary Jean Castillo, who did she work for?

24          A       She was an associate of MEI and Common Law Office of  
25   America.



1 Q Did she work for Mr. Williams?

2 A She did, yes.

3 Q And would she from time to time take care of  
4 financial matters for Mr. Williams?

5 A Yes.

6 Q And did she here -- by this exhibit, did she send  
7 monies to Texas?

8 A Yes.

9 Q And what count is this related to?

10 A Exhibit 8 is related to Count 8.

11 Q All right. And that's a wire fraud count; is that  
12 correct?

13 A Yes, sir.

14 Q All right. Let me direct -- oh, Your Honor, did I  
15 move for the introduction of Exhibit 8? I move so.

16 THE COURT: I don't believe you did. Do you wish to  
17 move it into evidence?

18 MR. SORENSON: Yes, Your Honor.

19 THE COURT: Okay. Mr. Williams, any objections?

20 THE DEFENDANT: No objection.

21 THE COURT: Exhibit 8 is received.

22 (Exhibit 8 received into evidence.)

23 Q (BY MR. SORENSON:) Okay. Let me direct your  
24 attention over to Exhibit 9. What is Exhibit 9?

25 A Exhibit 9 is a -- an email chain back and forth

1 between Anthony Williams and an MEI client by the name of  
2 Melvin.

3 Q All right. And are they discussing the business of  
4 MEI?

5 A Yes, they are.

6 MR. SORENSON: Your Honor, at this time we move for  
7 the introduction of Exhibit 9.

8 THE COURT: All right. Exhibit 9 is received.

9 Are you done with Exhibit 7? Can we take that off the  
10 screen?

11 MR. SORENSON: Oh, I apologize, Your Honor.

12 (Exhibit 9 received into evidence.)

13 THE COURT: All right. Any objection to Exhibit 9.

14 THE DEFENDANT: No objection.

15 THE COURT: Thank you. Received.

16 Q (BY MR. SORENSON:) Okay. Now, is Exhibit 9 the  
17 basis for any counts in the indictment?

18 A Yes, it is.

19 Q Which counts?

20 A Counts 9 through 12.

21 Q And are these all emails that discuss the business  
22 of MEI with Mr. Ventura?

23 A Yes, that's right.

24 Q And was Mr. Ventura a client of MEI?

25 A He was, yes.

1 Q And did he pay MEI a substantial amount of money?

2 A He did.

3 MR. SORENSON: Your Honor, may I publish No. 9?

4 THE COURT: You may.

5 Q (BY MR. SORENSON:) Okay. Is this the email chain?

6 A Yes, it is.

7 Q And are -- in this email chain are they discussing

8 basically payments?

9 A Yes.

10 Q And it starts off on November 23rd, is it fair to

11 say, 2014?

12 A Yes.

13 Q All right. Let me get that. All right. And this

14 is an email from Mr. Ventura; is that correct?

15 A Yes.

16 Q And that's a Gmail email, correct?

17 A Yes, it is.

18 Q All right. Go ahead read it.

19 A (Reading:) "Aloha, Mr. Williams. It's almost the

20 end of the month and I still did not received my mortgage bill

21 for December. Shall I go ahead and make the payment anyway?

22 Are you back in Hawaii? I'm looking forward to seeing you when

23 you get back. Have a happy holiday. Aloha."

24 Q So Mr. Ventura is asking about his mortgage bill; is

25 that correct?

1           A       Yes.

2           Q       And does this indicate that he at least believes  
3 he's paying his mortgage?

4           A       Yes.

5                   THE DEFENDANT:  Objection.  Speculation.

6                   THE COURT:  Sustained.  The jury will disregard that  
7 last answer.

8           Q       (BY MR. SORENSON:)  And this is the answer that I've  
9 just highlighted; is that correct?

10          A       Yes.

11          Q       And what does Mr. Williams say here?

12          A       (Reading:)  "Yes, you can just mail your check  
13 payment to Texas.  You should be getting a yearly payment  
14 voucher soon.  I will be back in Hawaii Sunday.  Have a happy  
15 Thanksgiving."

16          Q       All right.  Let me direct your attention over  
17 to -- oh, this count I think you've indicated relates to -- or  
18 this exhibit relates to Counts 9 through 12, is that fair to  
19 say?

20          A       Yes, sir.

21          Q       All right.  Let me direct your attention over to  
22 Exhibit 10.  And what is Exhibit 10?

23          A       Exhibit 10 is an email from Anthony Williams to  
24 multiple individuals with some sort of association to either  
25 MEI or Common Law Office of America.

1           MR. SORENSON: Okay. Your Honor, we move for the  
2 introduction of 10.

3           THE COURT: All right. Any objection?

4           THE DEFENDANT: No objection.

5           THE COURT: Received.

6           (Exhibit 10 received into evidence.)

7           MR. SORENSON: We are not going to publish 10, Your  
8 Honor. We'll just move on to 11.

9           Q        (BY MR. SORENSON:) Can you identify 11?

10          A        Yes. 11 is an email chain between an MEI homeowner  
11 client, Mary Jane Laforteza, and her attorney and with the most  
12 recent email being Mary Jane Laforteza forwarding the chain to  
13 Anthony Williams.

14          Q        Okay. And this exhibit, is it related to  
15 Exhibit 12?

16          A        It is, yes.

17          Q        Okay. And what is Exhibit 12?

18          A        Exhibit 12 is an email from Anthony Williams to Mary  
19 Jane Laforteza.

20                 MR. SORENSON: All right. And, Your Honor, at this  
21 time we're going to move for the introduction of 12 and 11.

22                 THE COURT: All right. Any objection to Exhibits 11  
23 or 12, Mr. Williams?

24                 THE DEFENDANT: No objection.

25                 THE COURT: All right. Both are received.

1 (Exhibits 11 and 12 received into evidence.)

2 Q (BY MR. SORENSON:) Special Agent Crawley,

3 Exhibit 11 relates to Count 13; is that correct?

4 A Yes, that's right.

5 Q And Exhibit 12 relates to Count 12; is that correct?

6 A Yes, sir.

7 Q Now, from a timing standpoint, Exhibit 12 comes  
8 before Exhibit 11, right?

9 THE DEFENDANT: Objection as leading.

10 THE COURT: Well, it's foundational, so I'll  
11 overrule it. So, I mean, you could just look -- are you  
12 looking at the date? You want her to look at the date?

13 MR. SORENSON: Yes -- well, yes.

14 THE WITNESS: Count 12 is dated the day after Count  
15 -- excuse me. Exhibit 12 is dated a day after Exhibit 11.

16 Q (BY MR. SORENSON:) Now, let's look at -- Your  
17 Honor, may we publish 12?

18 THE COURT: You may.

19 Q (BY MR. SORENSON:) Now, to help the jury, can you  
20 just explain what's -- what's being said here or just read it?

21 A (Reading:) "Dear Mr. and Mrs. Laforteza, as I  
22 explained to you all, you must have the attorney at law remove  
23 himself from being your attorney of record because as long as  
24 he is your attorney of record, you cannot challenge  
25 jurisdiction, and his first duty is to the courts and not to

1 you as the client. Please check out the link below to see the  
2 law regarding this."

3 MR. SORENSON: Okay. And, Your Honor, may we  
4 publish 11?

5 THE COURT: You may.

6 Q (BY MR. SORENSON:) And what is Exhibit 11?

7 A Exhibit 11 is an email chain between Mary Jane  
8 Laforteza, who is an MEI homeowner client -- between Mary Jane  
9 and her attorney, Keone Agard.

10 Q All right. And it starts out, though? -- this at  
11 the very top from Mary Jane Laforteza. Was she a client of  
12 Mr. Williams?

13 A Yes, she was.

14 Q And this is to Anthony Williams; is that correct?

15 A Yes, it is.

16 Q And is she forwarding this email to Keone Agard?

17 A Yes.

18 Q And is he -- who was he?

19 A He was the attorney helping she and her husband  
20 Reymundo with their house.

21 Q Okay. And so she actually had a real attorney  
22 helping her; is that correct?

23 A Yes, she did.

24 Q But the other email from Mr. Williams tells her that  
25 she has to get rid of the real attorney; is that correct?

1           A       Yes.

2           Q       Okay. All right. Let me direct your attention over  
3 to 13. What is 13?

4           A       13 is an email chain between an MEI homeowner  
5 client, Melvyn Ventura, and Anthony Williams.

6           Q       All right. And is it related to the business of  
7 MEI?

8           A       Yes, it is.

9                   MR. SORENSON: Your Honor, we move for Exhibit 13  
10 into evidence.

11                   THE COURT: Any objection?

12                   THE DEFENDANT: No objection.

13                   THE COURT: Received.

14                   (Exhibit 13 received into evidence.)

15                   MR. SORENSON: Your Honor, may we publish?

16                   THE COURT: You may.

17           Q       (BY MR. SORENSON:) And is Exhibit 13 related to a  
18 count in the indictment?

19           A       It is, yes, Count 11.

20           Q       All right. And this is I guess right -- I'm just  
21 going to highlight for the jury what I want to have you  
22 concentrate on.

23                   Okay. So we have this starting with an email from  
24 Mr. Ventura; is that correct?

25           A       Yes, that's right.



1 Q And could you read what Mr. Ventura states?

2 A (Reading:) "Aloha, Mr. Williams. Thank you once  
3 again for a productive meeting I had with you this morning.  
4 Each time I spent with you I gain more confident and it give me  
5 courage to response to questions from clients that have a doubt  
6 and unsure of the constitutional law that protects us. It take  
7 patience, time and courage to gain confidence and many people  
8 are not doing it. Question I forgot to ask you: On the notice  
9 of acceptance of orders, the term 'I am a man called Maurice,'  
10 would that be in general term? If a client is a female, will I  
11 change the term woman instead of a man? And so with the  
12 sheriff, would I chance the man to a woman as acting as  
13 sheriff? Sounds like an ignorant question but I just want to  
14 clarify."

15 Q All right. And then there's an answer from  
16 Mr. Williams right above that; is that correct?

17 A Yes, that's right.

18 Q And what does that say?

19 A (Reading:) "Yes, it goes in the person's name and  
20 if it's a woman then you change that to woman."

21 Q And then Mr. Ventura states?

22 A (Reading:) "Gee, thanks. Excuse me grammar  
23 weakness."

24 Q Okay. Was Mr. Ventura one of those individuals who  
25 did not have the best command of the English language?

1           A           He didn't require an interpreter.

2                   MR. SORENSON:   Okay.   Your Honor, how we doing on  
3   time?

4                   THE COURT:   We are an hour and about five minutes  
5   in, so we are going to take a recess in about five minutes, or  
6   unless you feel that you need a little more time or this would  
7   be a good time?

8                   MR. SORENSON:   We're fine to keep plowing ahead,  
9   Your Honor, or we can take a recess now, if you'd like.

10                  THE COURT:   All right.   So about five more minutes  
11   and then we'll take a recess.

12                  MR. SORENSON:   Okay.

13           Q           (BY MR. SORENSON:)   All right.   Let me direct your  
14   attention then over to Exhibit 15.   What is Exhibit 15?

15           A           Exhibit 15 are the articles of incorporation and  
16   bylaws of Mortgage Enterprise Investments.

17           Q           Okay.   And I think there's just part of this I  
18   wanted to ask you about, but did you recover this -- I think  
19   you've indicated you recovered this from the computer at  
20   Democrat Street?

21           A           Yes, that's right.

22           Q           And does this list officers of MEI?

23           A           It does, yes.

24                   MR. SORENSON:   All right.   Your Honor, at this time  
25   I'm going to move in Exhibit 15.

1 THE COURT: Any objection, Mr. Williams?

2 THE DEFENDANT: No objection.

3 THE COURT: All right. Received.

4 (Exhibit 15 received into evidence.)

5 Q (BY MR. SORENSON:) All right. I'm going to direct  
6 your attention to the back page here, second page from the  
7 back.

8 Your Honor, may we publish?

9 THE COURT: You may.

10 Q (BY MR. SORENSON:) Okay. Governing officers, do  
11 you see that?

12 A I do, yes.

13 Q And who's listed as the owner of MEI?

14 A Yoseph A. Hezekyah.

15 Q And who is Yoseph A. Hezekyah?

16 A Our investigation showed that to be Anthony  
17 Williams.

18 Q All right. And did Mr. Williams at any time have  
19 his name changed to Yoseph Hezekyah?

20 A We -- I don't know if it was legally changed. We  
21 did identify an affidavit of notice of name change that  
22 Mr. Williams had drafted.

23 Q And the next page down -- okay. So the president is  
24 listed as Whitney E. Hadasa; is that correct?

25 A That's correct.

1           Q       And did your investigation show who Whitney E.  
2   Hadasa was?

3           A       We could not locate Whitney E. Hadasa.

4           Q       The CEO listed as Anthony Williams; is that correct?

5           A       Yes.

6           Q       CFO licensed as Barbara Williams; is that correct?

7           A       Yes.

8           Q       Okay. And down here, chief securitization auditor,  
9   that's listed as Edna Franco; is that correct?

10          A       Yes, that's right.

11          Q       And that was a person here in Hawaii, right?

12          A       Right, yes.

13          Q       And that particular exhibit is not related to any  
14   counts in the indictment, is it?

15          A       No, it's not.

16          Q       All right. Let me direct your attention over to 16.

17                 THE COURT: Would this be a good time to take a  
18   recess?

19                 MR. SORENSON: Sure.

20                 THE COURT: All right. So ladies and gentlemen,  
21   we're going to take our next recess for 15 minutes. If you  
22   would leave your iPads and your notebooks in the courtroom, and  
23   again, of course, don't discuss the case with anyone or allow  
24   anyone to discuss it with you. Don't go on social media or try  
25   to do any research, investigation.

1           Please rise for the jury. They're on a 15-minute recess  
2 and will return at 11:35.

3           (Open court out of the presence of the jury.)

4           THE COURT: The record will reflect the jury's no  
5 longer present. Are there any matters we need to take up  
6 before we leave on our recess?

7           MR. SORENSON: Not from us, Your Honor.

8           THE COURT: Mr. Williams?

9           THE DEFENDANT: Just if I need to offer video  
10 evidence, I would be able to do that on cross, right?

11          THE COURT: So if you want to use video in  
12 cross-examination, you first have to get it admitted into  
13 evidence. Did you work out an agreement with our IT people?  
14 'Cause we don't have the equipment available at this time,  
15 unless you have it on a laptop and you're intending to play it.

16          So I would suggest that you guys discuss that before  
17 cross-examination how you're going to present that and connect  
18 that up with our court system -- court document system. All  
19 right? We're in recess.

20          MR. ISAACSON: Your Honor, one matter.

21          THE COURT: Yes.

22          MR. ISAACSON: I believe Juror No. 1 -- I can't tell  
23 if he's falling asleep or not. I mean --

24          THE COURT: Okay. Thank you for alerting me to  
25 that. So we'll -- I'll keep an eye on him with regard to that.

1     Okay.

2                   MR. SORENSON:  It can't be possible.  This is  
3     riveting.

4                   THE COURT:  I know.  You gotta turn up the charm,  
5     there, Mr. Sorenson.

6                   We're in recess.  Thank you.

7                   (A recess was taken.)

8                   (Open court out of the presence of the jury.)

9                   THE COURT:  All right.  The record will reflect the  
10    presence of counsel, Mr. Williams.  The witness is on the  
11    stand.

12                  If there's no issues, then we're going to have  
13    Ms. Elkington go get the jury.  All right?

14                  We're in recess.

15                  (A recess was taken.)

16                  (Open court in the presence of the jury.)

17                  THE COURT:  And the record will reflect the presence  
18    of the ladies and gentlemen of the jury, counsel, Mr. Williams.  
19    The witness is on the stand.

20                  You may resume questioning, Mr. Sorenson.

21                  MR. SORENSON:  Thank you, Your Honor.

22                  Q     (BY MR. SORENSON:)  Okay.  Special Agent Crawley,  
23    let's go to Exhibit 16.  Please identify it.

24                  A     This is the MEI application for Evelyn and Arnold  
25    Subia.

1 Q And who are the Subias?

2 A They were a homeowner that signed up for  
3 Mr. Williams's mortgage reduction program.

4 Q And this is an application form; is that correct?

5 A Yes, that's right.

6 Q And did your investigation reveal that individuals  
7 that were signing up for this service would do this type of  
8 application form?

9 A Yes.

10 MR. SORENSON: Your Honor, at this time we're going  
11 to move for the introduction of 16.

12 THE COURT: All right. Any objection?

13 THE DEFENDANT: No objection.

14 THE COURT: All right. Sorry about that. All  
15 right. Received.

16 (Exhibit 16 received into evidence.)

17 MR. SORENSON: Okay. May we publish, Your Honor?

18 THE COURT: You may.

19 MR. SORENSON: Your Honor, I apologize. We're  
20 having some technical difficulty here.

21 THE COURT: All right. Take your time.

22 MR. SORENSON: Your Honor, could we instruct the  
23 jury to put their iPads down for just a moment just in case  
24 something gets displayed?

25 THE COURT: No, it's not. We have it on mute. Yes.

1 MR. SORENSON: Let's figure out what we've got here.

2 Your Honor, we're going to reboot it, but I may be able to  
3 proceed using ELMO.

4 THE COURT: Very good.

5 MR. SORENSON: You have more technology. All right.  
6 Your Honor, may we publish?

7 THE COURT: You may.

8 Q (BY MR. SORENSON:) All right. I'm going to direct  
9 your attention first off, Special Agent Crawley, to the first  
10 page. Okay. So is this the application?

11 A It is, yes.

12 Q All right. And we see their name; is that correct?

13 A Yes.

14 Q And we see that they put some other information in  
15 here; is that correct?

16 A Yes.

17 Q And is it signed at the bottom?

18 A Yes, it is.

19 Q And who is it signed by?

20 A The top signature is Anthony Williams's signature  
21 and the below signature is Evelyn Subia.

22 Q Just a second. Here as we. All right. I'm going  
23 to direct your attention back to page 2. All right. So this  
24 is the homeowner's service guarantee agreement; is that  
25 correct?



1           A       Yes, that's right.

2           Q       All right. If you could just read this to the jury.  
3 I'm not sure they can see it.

4           A       (Reading:) "I understand that what Mortgage  
5 Enterprise Investments or MEI guarantees is the ability to file  
6 on my behalf, the homeowner, and secure a mortgage service  
7 payment, MSP, fee that is half of what my current mortgage  
8 payment is.

9                   "I understand that this is not a mortgage loan  
10 modification nor a refinancing of the loan. I understand that  
11 my mortgage service payment, MSP, does not include mortgage  
12 insurance through the FHA nor the U.S. Department of Housing  
13 and Urban Development.

14                   "I understand it is my responsibility as homeowner  
15 to procure my own homeowner's insurance. I understand that on  
16 average it takes one-half of the time of my original payoff  
17 time obligation to pay off my mortgage service payment, MSP. I  
18 understand that there is an initial \$500 to \$1,000 file setup  
19 fee in order to begin the process.

20                   "I understand that if Mortgage Enterprise  
21 Investments or MEI does not reduce my monthly payment by  
22 one-half of what I am currently paying on my mortgage and does  
23 not reduce my current mortgage loan payoff term by one-half of  
24 my current payoff obligation, MEI will fully refund my \$500 to  
25 \$1,000 initial file setup fee if paid in full at the time of

1 the initiation of my file.

2 "I understand that MEI's 100 percent money back  
3 guarantee to me as a homeowner is to ensure that I incur no  
4 risk if Mortgage Enterprise Investments is unsuccessful in  
5 reducing my monthly payment and payoff time.

6 "I am entering into this agreement upon my own  
7 volition and fully understand the terms and conditions of this  
8 agreement."

9 Q Okay. So let me get this right. Mr. Williams  
10 offers a service essentially that says you don't need to pay  
11 your mortgage any more; is that correct?

12 A Yes.

13 Q Pay me, correct?

14 A Yes, that's right.

15 THE DEFENDANT: Objection. That's leading.

16 THE COURT: All right. So he -- you're right, it is  
17 leading. But it's foundational. He's just providing something  
18 that's basic, so --

19 THE DEFENDANT: It's not correct.

20 THE COURT: -- you're correct. Okay. So over your  
21 objection, I overruled the objection.

22 Next question.

23 MR. SORENSON: Thank you, Your Honor. Just trying  
24 to get her where she needs to be.

25 THE COURT: Yes.

1           Q       (BY MR. SORENSON:) All right. So we've got  
2 one-half of the term, correct?

3           A       Yes.

4           Q       One-half the amount?

5           A       Yes.

6           Q       But don't pay your mortgage company, pay  
7 Mr. Williams; is that correct?

8           A       Yes, that's right.

9           Q       All right. And so in Hawaii and with the folks you  
10 spoke with, a lot of their mortgage payments, were they  
11 relatively high?

12          A       Yes, they were.

13          Q       What was the average that you were seeing their  
14 monthly mortgage payment to be?

15          A       We were seeing mortgage payments anywhere from 2- to  
16 \$4,000 prior to the mortgage reduction program.

17          Q       In the amounts owed to the lending institutions that  
18 lent them the money to buy the house, what kind of loan amounts  
19 were you seeing, total loan amounts?

20          A       Anywhere from 600,000 upwards.

21          Q       Okay. So if we take a \$600,000 indebtedness to a  
22 lending institution, essentially can you break down for the  
23 jury what that would mean for payments under this plan?

24          A       So this particular -- this particular form discusses  
25 cutting the monthly payment down in half and the term. So, for

1 instance, if your term is 30 years, it would be cut to 15. If  
2 your monthly mortgage payment was \$5,000, it would be cut to  
3 2,500.

4 Q And if you owed 600,000 to your bank, would you then  
5 owe \$300,000 to Mr. Williams?

6 A Yes, that's right.

7 Q All right. And so Mr. Williams was telling folks,  
8 You owe me in this case \$300,000, for instance, correct?

9 A Yes, in the example, yes.

10 Q Okay. Did he ever loan any money that you could  
11 tell to anybody?

12 A None that we could identify.

13 Q So he loaned no money, yet did he tell mortgage  
14 holders that they owed him money?

15 A Yes, that's right.

16 Q Okay. And the payment schedule was one-half of the  
17 monthly amount, so if you had a \$300 mortgage payment, how much  
18 would you pay Mr. Williams?

19 A \$300,000 total --

20 Q No. If you had a \$3,000 monthly mortgage payment,  
21 how much would you pay Mr. Williams?

22 A 1,500 monthly.

23 Q Would that be every month?

24 A Yes.

25 Q Until the full amount was paid off?

1           A       Correct.

2           Q       Did you ever see any of the notes that he issued to  
3 folks?

4           A       Yes, I did.

5           Q       And would those be notes where -- well, you tell me.  
6 What would the notes be?

7           A       The notes were attached to the back of a mortgage  
8 that MEI would create on behalf of the homeowner.

9           Q       And what were the promises in the notes?

10          A       The promises in the notes were --

11                   THE DEFENDANT: Objection. Hearsay.

12                   THE COURT: You're referring to the document?

13                   MR. SORENSON: Yeah, Your Honor --

14                   MR. WILLIAMS: That's not in evidence.

15                   MR. SORENSON: -- we're going to get to those  
16 documents so we can ask about those later.

17                   THE COURT: Okay. Sorry. Sustained.

18          Q       (BY MR. SORENSON:) All right. Let's look a little  
19 further in the agreement. I'm going to direct your attention  
20 back to the homeowner's guaranteed services. Do you see that?

21          A       Yes.

22          Q       Okay. Now were these --

23                   THE COURTROOM MANAGER: Is that on the same exhibit?

24                   MR. SORENSON: Yes.

25                   THE COURT: You're on the same exhibit?

1           MR. SORENSON: Yes, we're still within the same  
2 exhibit.

3           Q       (BY MR. SORENSON:) All right. Do you see the  
4 homeowner's guaranteed services?

5           A       Yes, I do.

6           Q       Would you please read those for the jury?

7           A       (Reading:) "As a benefit of being a mortgage  
8 service customer, you will have access to the following common  
9 law services as long as you are current with your payments and  
10 not in delinquent status. These services will be available to  
11 you as a lifetime guarantee even after your mortgage service is  
12 paid in full. Some services will have restrictions and others  
13 will not. The list below will outline the services with  
14 restrictions and services without restrictions."

15          Q       So Mr. Williams offered these services below that  
16 are listed to clients of MEI; is that correct?

17          A       Yes, that's right.

18          Q       And did those include wills and trusts?

19          A       They do, yes.

20          Q       Powers of attorney?

21          A       Yes.

22          Q       And also representation?

23          A       Yes, that's right.

24          Q       Do you see down where it says Sovereign Peace  
25 Officer Certification?

1 A Yes.

2 Q What is that, if you know?

3 A I don't know if I could speak to exactly what that  
4 is.

5 Q Okay. What about expatriation?

6 A I couldn't speak to that, either. I don't know what  
7 that is.

8 Q All right. Let me direct your attention over to the  
9 next page, and I'm not going to display it, but I'm going to  
10 ask you to read it.

11 A Page 7?

12 Q Yes.

13 A (Reading:) "Foreclosure disclosure, terms and  
14 conditions. This contract agreement is predicated upon  
15 pre-foreclosure status and pre-judicial court order or judgment  
16 being rendered. If you are represented by the Common Law  
17 Office of America attorneys in fact and for reasons on our part  
18 that the customer somehow loses their home after we have had  
19 ample time and proper notification and authorization to  
20 litigate on the customer's behalf, all of the services of the  
21 Common Law Office of America will be free of charge.

22 "If you have chosen to seek other legal counsel and  
23 a judgment has been rendered against you by a judge through a  
24 court order -- excuse me -- against you by a judge through a  
25 court order and you decide to procure our services to protect

1 your property interest, you will not receive the same guarantee  
2 as customers who have come to us in pre-foreclosure or  
3 pre-judicial court order.

4 "However, if you feel you have not been adequately  
5 represented by your former attorney at law, we are willing to  
6 go after them on your behalf for punitive monetary damages.  
7 Common Law Office of America makes no guarantees except that we  
8 will represent you to the best of our ability to protect your  
9 property interests and execute our fiduciary duties to the  
10 same.

11 "Mortgage Enterprise Investments does not have a  
12 foreclosure policy to foreclose on any customers' homes. We  
13 assist customers in keeping their homes at an affordable rate.  
14 If your financial situation undergoes a drastic transformation,  
15 whether there is an illness, death in the family, loss of job,  
16 or pay cut, we have a hardship program that you may qualify  
17 for. That program is predicated upon your ability to show  
18 proof that your financial situation has changed from when you  
19 initially signed up for the mortgage service payment reduction.  
20 You must provide documented proof that your financial status  
21 has changed. Once you provide the proper documentation, then  
22 your mortgage service payment will be adjusted accordingly.

23 "We have a rock solid proven method that have  
24 yielded a 100 percent success rate and we stand firmly behind  
25 our guarantee. By signing this foreclosure disclosure, you



1 agree that you understand the terms and conditions of the  
2 contract with Mortgage Enterprise Investments."

3 Q Okay. So the agreement there, does it say that  
4 Mr. Williams is going to go after attorneys at law that  
5 represent clients?

6 A Yes, it does.

7 Q Did you find any instances at least in Hawaii where  
8 that had actually occurred?

9 A Where he came after attorneys?

10 Q Yes.

11 A Not that I'm aware of.

12 Q All right. Let me direct your attention now over to  
13 Exhibit 17. And what is 17?

14 A 17 is an MEI application of another homeowner that  
15 signed up for the mortgage reduction program.

16 MR. SORENSON: Your Honor, we move for the  
17 introduction of 17.

18 THE COURT: Okay. Any objection?

19 THE DEFENDANT: No objection.

20 THE COURT: All right. Received.

21 (Exhibit 17 received into evidence.)

22 MR. SORENSON: We are not going to publish that,  
23 Your Honor, because it's pretty much the same as the last.

24 THE COURT: Okay.

25 Q (BY MR. SORENSON:) All right. Let me direct your

1 attention -- well, let me -- we're at a place where we can move  
2 on to another search.

3 In the context of your investigation, did you  
4 conduct other searches?

5 A I did, yes.

6 Q And was one of those searches conducted in Texas?

7 A Yes, it was.

8 Q Specifically where was it conducted?

9 A At Barbara Williams's residence in Killeen, Texas.

10 Q And why did you search Barbara Williams's residence?

11 A We had enough information at that point based on  
12 just various sources throughout the investigation that we felt  
13 that we had sufficient probable cause to believe there was  
14 evidence in her residence that she was assisting Mortgage  
15 Enterprise Investments and this mortgage reduction program.

16 Q Was her residence there in Texas, was that a place  
17 where a lot of the mailings went in this case?

18 A Yes, that's right.

19 Q And when people would sign up for Mr. Williams's  
20 services here, would they then -- were they then told to mail  
21 their payments from time to time?

22 A Some of them were, yes.

23 Q And where were they told to mail those payments to?

24 A To a PO Box that Barbara Williams controlled.

25 Q And with that information and other information, did

1     you then obtain a search warrant?

2           A       I did, yes.

3           Q       And did you execute that search warrant?

4           A       I did.

5           Q       And where was it executed?

6           A       It was executed in Killeen, Texas.

7           Q       Where specifically, though?

8           A       Oh, excuse me. 2306 Bluebonnet Drive which is

9     Barbara Williams's residence.

10          Q       Were you there with anyone else?

11          A       Yes, we had a team of -- a search team.

12          Q       Were there any FBI agents from Texas present?

13          A       Yes.

14          Q       Were you the lead agent on the search?

15          A       I was, yes.

16          Q       And did you collect anything?

17          A       Yes, we did.

18          Q       What did you collect?

19          A       Records and documents related to MEI and the

20     mortgage reduction program.

21          Q       Okay. I'll direct your attention to Exhibit 100.

22                   Do you see that?

23          A       I do, yes.

24          Q       What is Exhibit 100?

25          A       Exhibit 100 is a letter sent from Mortgage

1 Enterprise Investments to one of its homeowner clients.

2 Q All right. And who is that? Which owner?

3 A Melvyn Ventura.

4 Q Okay. And you had discussed Mr. Ventura earlier in  
5 your testimony; is that correct?

6 A Yes.

7 Q And is this dated August 28th, 2013?

8 A It is, yes.

9 MR. SORENSON: All right. Your Honor, at this time  
10 we're going to move for the introduction of 100.

11 THE COURT: All right. Any objections?

12 THE DEFENDANT: No objection.

13 THE COURT: All right. Received.

14 (Exhibit 100 received into evidence.)

15 MR. SORENSON: And, Your Honor, we'll ask to publish  
16 it.

17 THE COURT: You may.

18 THE COURTROOM MANAGER: Are you back on your  
19 computer?

20 THE COURT: You have the computer or you going to  
21 do the --

22 MR. SORENSON: No, I'm going to -- we're apparently  
23 we're back online here.

24 THE COURT: We just have to switch what the source  
25 is.

1 MR. SORENSON: Oh, yeah.

2 THE COURT: Thank you.

3 MR. SORENSON: We'll leave it out just in case,  
4 but --

5 THE COURT: All right. Very good. All right. So  
6 it is published.

7 MR. SORENSON: Thank you, Your Honor.

8 Q (BY MR. SORENSON:) All right. So Special Agent  
9 Crawley, I'm going to direct your attention to particular parts  
10 of this. We're going to come blow it up and I'll ask you to  
11 read it.

12 Can you just broadly or generally describe what this  
13 is?

14 A Yes. This is a welcome letter or a letter sent to a  
15 homeowner that had recently signed up for the program thanking  
16 them for their interest and kind of explaining what steps will  
17 be taken next.

18 Q All right. Why don't you read it for the jury.

19 A (Reading:) "Dear, Mr. Melvin C. Ventura, we want to  
20 take this time to thank you for your interest in our program.  
21 We want to thank you for allowing us to procure your mortgage  
22 to reduce your mortgage and your payoff time. This letter is  
23 to notify you that we will be handling all aspects of your  
24 mortgage. If your former finance company contacts you, please  
25 forward any and all correspondences to the Common Law Office of

1 America. Your former mortgage company no longer have an  
2 interest in your property, and if they send you any  
3 correspondences, threatening foreclosure procedures, or that if  
4 you don't pay them that your credit rating will be negatively  
5 affected, this is in violation of the FDCPA, TCPA, RESPA and  
6 TILA, and we will litigate on your behalf to the fullest extent  
7 of the law."

8 Q Let me stop you there. The first thing I wanted to  
9 ask you about, does he say here, "We want to thank you for  
10 allowing us to procure your mortgage"?

11 A He does, yes.

12 Q Now, then he's telling people here that he's  
13 procuring their mortgage?

14 A Yes.

15 Q He also states, "This letter's to notify that we  
16 will be handling all aspects of your mortgage," is that  
17 correct?

18 A Yes, that's right.

19 Q Does he also tell homeowners, "Your former mortgage  
20 company no longer have an interest in your property"?

21 A Yes, that's what's stated here.

22 Q But there's no representation in here that you can  
23 see that he's done anything with the mortgage company to  
24 satisfy their debt that's on the books; is that correct?

25 A Correct.

1           Q       All right. I'll start you down toward the bottom.  
2   It states, "Your monthly mortgage payment is now \$886 a month."

3                   Do you see that?

4           A       Yes, I do.

5           Q       And so in the case of Mr. Ventura here, he would be  
6   now obligated to pay Mr. Williams almost \$900 a month?

7           A       Yes, that's right.

8           Q       For how long?

9           A       Doesn't have a term here.

10          Q       Based on the other agreements that you've seen,  
11   pretty consistent that it was one-half the term of your current  
12   mortgage; is that correct?

13          A       Correct, yes.

14                   THE DEFENDANT: Objection. Speculation.

15                   MR. SORENSON: I think it's grounded in her  
16   understanding of the other -- all of the agreements say the  
17   same thing, Your Honor.

18                   THE COURT: I know, but what basis does she have to  
19   understanding? She doesn't write mortgages or do loans.

20          Q       (BY MR. SORENSON:) You've seen many of the other  
21   agreements in this case; is that correct?

22          A       Yes.

23          Q       And the other agreements you've seen between  
24   Mr. Williams and homeowners, did they always list a term of  
25   payment?

1           A           When -- in the document we just read, it discussed  
2 cutting the term in half.

3           THE COURT:   Okay.   So the objection's sustained.  
4 She can say what's happened in the other things, but you're  
5 having her make conclusions that it's without extinguishing the  
6 underlying and that's not what it literally says.

7           MR. SORENSON:   Okay.

8           THE COURT:   Yeah.

9           MR. SORENSON:   I think -- I think we got what we  
10 wanted, Your Honor.   Thank you very much.

11          THE COURT:   Okay.

12          Q           (BY MR. SORENSON:)   All right.   Let me direct your  
13 attention over to Exhibit 101.   And what is 101?

14          A           This is an invoice for Melvyn Ventura to make  
15 payments to MEI.

16          Q           And I'll ask you, Exhibits 101 through 132, can you  
17 broadly describe them for the jury and for the Court?

18          A           Yes.   So Exhibits 101 to 132 are documents related  
19 to roughly 10 or 11 monthly mortgage payments that Mr. Ventura  
20 would send to MEI.   The exhibits -- I think there's about 32  
21 exhibits -- include a -- generally they include an invoice, the  
22 envelope that it was mailed in to Texas, and then the check  
23 that was in the envelope.

24          Q           All right.   And do they all relate to counts in the  
25 indictment?



1 A Yes, they do.

2 Q And are they all related to mailings that occurred  
3 from Hawaii and went to Texas?

4 A Yes, that's right.

5 MR. SORENSON: Your Honor, we're going to move for  
6 the introduction of 101 through 132 all at once at this time.

7 THE COURT: Any objections?

8 THE DEFENDANT: No objection.

9 THE COURT: Received.

10 (Exhibits 101-132 received into evidence.)

11 Q (BY MR. SORENSON:) Now we're going to run through  
12 just a few of these so the jury can see them, but would it be  
13 correct -- or let me just ask you -- are they all pretty  
14 consistent as far as what they are?

15 A Yes.

16 Q All right. And so Exhibit 101, what is that?

17 A 101 is an invoice that Melvyn Ventura mailed to MEI  
18 along with a check. So this, in his handwriting, it's for the  
19 11-28-2014 payment of \$900.

20 MR. SORENSON: Your Honor, we may publish?

21 THE COURT: You may.

22 Q (BY MR. SORENSON:) Okay. So is this an invoice  
23 from MEI?

24 A Yes.

25 Q Did you see a number of invoices like this in your

1 investigation?

2 A Yes.

3 Q And did you seize a number of these from the  
4 residence there in Texas?

5 A Yes, we did.

6 Q All right. Let's just look at it. It states at the  
7 top New Mortgage; is that correct?

8 A Yes, it does.

9 Q You don't know who wrote that though; is that  
10 correct?

11 A Correct.

12 Q And there's some writing over to the side that I'll  
13 highlight. Okay. What is that?

14 A This is handwriting. The first six digits refer to  
15 the date that the payment is being submitted for the -- so in  
16 this case, the most recent is 11-28-14 to denote November 28,  
17 2014.

18 The next two digits are the number of payments, so  
19 this would have been the second payment that Mr. Ventura made  
20 to MEI.

21 And in the right column it is the amount of the  
22 payment.

23 Q Okay. And I'm highlighting -- can you see what I'm  
24 highlighting here at the very top?

25 A Yes, I can.

1           Q       Okay. So it states in the one little box there,  
2   Original Loss Amount; is that correct?

3           A       Original loan amount?

4           Q       Is that loan or loss?

5           A       Loan.

6                   THE COURT: Loan, l-o-a-n. I'm sorry.

7                   MR. SORENSON: Thank you, Your Honor.

8           Q       (BY MR. SORENSON:) Okay. So as we look at that  
9   amount with a dollar sign, can you tell what amount that is?

10          A       Yes. It is for \$512,393.04.

11          Q       Okay. And then we look over a few boxes over, you  
12   see Mortgage Service Loan Reduction. Do you see that?

13          A       Yes, I do.

14          Q       And what amount is that?

15          A       For \$256,196.52.

16          Q       And would this be consistent with being half of the  
17   other figure?

18          A       Yes.

19          Q       Okay. So the original loan amount and then you have  
20   this represented amount to be what's the debt that's owed; is  
21   that correct?

22          A       Yes, that's right.

23          Q       And look there to the right. It says Term, right?

24          A       Yes, it does.

25          Q       It actually says Terms; is that correct?

1           A       Yes.

2           Q       And that says 24?

3           A       24.09.

4           Q       Okay. All right. Let me direct your attention

5 now -- oh, and that relates to which count?

6           A       Count 21.

7           Q       Okay. And we have another document, 102, is that

8 correct, that relates to Count 22?

9           A       Yes.

10          Q       And what is that other document?

11          A       That is the envelope that Exhibit 101 was mailed in

12 to Texas.

13               MR. SORENSON: All right. Your Honor, we move for

14 the introduction of 102.

15               THE COURT: I think 102's already in, 102 --

16               MR. SORENSON: That's right. We put that in, that's

17 right. Your Honor, in this case we move to publish.

18               THE COURT: You may.

19               MR. SORENSON: If everybody can just turn their head

20 to the side.

21               THE COURT: Well, they have iPads, so they can do

22 that.

23               MR. SORENSON: Does it actually? I'll just do mine

24 like that. I don't really need to look at this.

25          Q       (BY MR. SORENSON:) What is this?

1           A       This is an envelope from Melvyn Ventura to MEI to  
2   the PO Box in Killeen, Texas, where the previous invoice was  
3   mailed with.

4           Q       So is this being offered as evidence of the mailing?  
5   Is that correct?

6           A       Yes, that's right.

7           Q       Of the invoice payment?

8           A       Yes.

9           Q       From Hawaii to Killeen, Texas?

10          A       Yes.

11          Q       All right. Thank you. All right. Let me direct  
12   your attention to Exhibit 103. And that relates to what count?

13          A       Count 22.

14          Q       All right. Do you recognize 103?

15          A       I do, yes.

16          Q       And what is it?

17          A       This is an invoice similar to Exhibit 101. This one  
18   is for the December payment, so the handwriting denotes  
19   12-24-14-03 to signify the third payment.

20                   MR. SORENSON: Your Honor, may we publish?

21                   THE COURT: You may.

22          Q       (BY MR. SORENSON:) Okay. I'm going to blow this up  
23   right after I highlight it, apparently.

24                   Okay. We've kind of been through this, but if you  
25   could just describe to the jury what this is.

1           A       So this is the next payment after the previous  
2 invoice we just discussed. This is a \$900 payment dated  
3 12-22-14 and signifying the third payment sent.

4           Q       And it indicates down below \$253,490.52; is that  
5 correct?

6                   THE COURT REPORTER: I'm sorry. Could you repeat  
7 that?

8                   MR. SORENSON: Oh, I'm sorry.

9           Q       (BY MR. SORENSON:) It indicates down below  
10 \$253,490.52; is that correct?

11          A       \$-496.52.

12          Q       I'm sorry. It's kind of blocked out here. So would  
13 that be the remaining amount of money owed?

14          A       Seems that way, yes.

15                   THE DEFENDANT: Speculation.

16                   THE COURT: All right. Overruled. The document  
17 speaks for itself.

18                   MR. SORENSON: It does, Your Honor. Thank you.

19          Q       (BY MR. SORENSON:) Okay. So we've kind of looked  
20 at some of these. Don't want to have to look at all of them.  
21 That can certainly happen at some point, but I'm going to ask  
22 you about each one of these exhibits and what count it relates  
23 to.

24          A       Okay.

25          Q       All right. I'm going to ask you to look at 104.

1           A       That's for Count 22.

2           Q       Right. Is that -- is that the envelope for

3   Exhibit 103?

4           A       It is, yes.

5           Q       And is that evidence of the mailing occurring?

6           A       Yes.

7           Q       And Exhibit 105, what is 105?

8           A       105 is an invoice for the January payment for

9   Mr. Ventura.

10          Q       Okay. And what is that related to?

11          A       Count 23.

12          Q       All right. And what is Exhibit 106?

13          A       The envelope for the January payment in Exhibit 105.

14          Q       All right. And is that also related to Count 23?

15          A       It is, yes.

16          Q       All right. And Exhibit 107, what is that?

17          A       This is the check mailed in the envelope with the

18   invoice for the January payment.

19          Q       Okay. And is that related to Count 23 as well?

20          A       It is, yes.

21          Q       What is Exhibit 108?

22          A       An invoice for a February payment from Mr. Ventura

23   to MEI.

24          Q       All right. And what count is that related to?

25          A       24.

1 Q All right. And please look at Exhibit 109. And  
2 what is that?

3 A This is the envelope that Exhibit 108 was mailed in  
4 to Killeen, Texas.

5 Q All right. And is that related to Count 24?

6 A It is, yes.

7 Q Okay. And Exhibit 110, what is that?

8 A This is the February payment that was in the  
9 envelope which was Exhibit 109.

10 Q All right. And is that related to Count 24?

11 A It is, yes.

12 Q All right. And 111?

13 A 111 is the March payment -- is an invoice for the  
14 March payment from Mr. Ventura to MEI.

15 Q And is that related to Count 25?

16 A It is, yes.

17 Q All right. And Exhibit 112?

18 A Is the envelope used to mail Exhibit 111.

19 Q Okay. Also then related to Count 25?

20 A Yes, sir.

21 Q All right. Exhibit 113, what is that?

22 A This is the check that was mailed in the envelope  
23 which is Exhibit 112.

24 Q Okay. Also related to Count 25?

25 A Yes, sir.



1 Q All right. Exhibit 114, what is that?

2 A This is the invoice for the April payment from

3 Mr. Ventura to MEI.

4 Q All right. Is that related to Count 26?

5 A It is, yes.

6 Q All right. And Exhibit 115, what is that?

7 A This is the envelope used to mail Exhibit 114.

8 Q Okay. And is that related to Count 26 as well?

9 A It is, yes.

10 Q All right. And Exhibit 116, what is that?

11 A It is an invoice for the May payment from

12 Mr. Ventura to MEI.

13 Q And is that related to Count 27?

14 A It is, yes.

15 Q And Exhibit 117?

16 A This is the envelope used to mail Exhibit 116.

17 Q Also then related to Count 27?

18 A Yes, sir.

19 Q All right. And Exhibit 118?

20 A Is the May payment check that was mailed inside

21 Exhibit 117.

22 Q And is that related to Count 27 as well?

23 A It is.

24 Q All right. And Exhibit 119?

25 A Is an envelope dated June 2015.

1 Q Okay. And what count is that related to?

2 A Count 28.

3 Q And Exhibit 120?

4 A Is a check dated June 27th, 2015, that was used to

5 mail inside Exhibit 119.

6 Q And is that related to Count 28 as well?

7 A It is, yes.

8 Q All right. Exhibit 121, what is that?

9 A This is an invoice for the July payment from

10 Mr. Ventura to MEI.

11 Q All right. And what count is that related to?

12 A Count 29.

13 Q And Exhibit 122?

14 A This is the envelope used to mail the invoice which

15 is Exhibit 121.

16 Q When you say "mail the invoice," would that be the

17 invoice and the check as well?

18 A Yes. The check is Exhibit 123, but, yes.

19 Q And is that also related to the same count?

20 A Yes, sir, Count 29.

21 Q Count 29?

22 A Uh-huh.

23 Q All right. So -- and next 123.

24 A Is the check that was the July payment that was

25 mailed inside of Exhibit 122.

1 Q And Exhibit 124?

2 A Is an invoice for the August payment from

3 Mr. Ventura to MEI.

4 Q And what count is that related to?

5 A Count 30.

6 Q All right. And 125?

7 A 125 is the envelope used to mail Exhibit 124.

8 Q All right. And Exhibit 127.

9 A 127 is the invoice for the September payment from

10 Mr. Ventura to MEI.

11 Q And what count is that related to?

12 A Count 31.

13 Q All right. And Exhibit 128?

14 A Is the envelope used to mail Exhibit 127.

15 Q And is that related to Count 31?

16 A It is, yes.

17 Q And Exhibit 129?

18 A Is the September payment check that was mailed

19 inside of Exhibit 128.

20 Q And that's also related to what?

21 A Count 31.

22 Q Thank you. Exhibit 130.

23 A 130 is the invoice for the October payment from

24 Mr. Ventura to MEI.

25 Q And what count is that related to?

1 A Count 32.

2 Q And Exhibit 131?

3 A Is the envelope used to mail Exhibit 130.

4 Q All right. Is that also related to --

5 A Count 32.

6 Q -- 32?

7 A Yes.

8 Q And Exhibit 132?

9 A Is the October payment check that was mailed inside

10 Exhibit 131.

11 Q Okay. And related also then to Count 32?

12 A Yes, sir.

13 Q All right. Direct your attention to 134. What is

14 that?

15 A 134 is a payment slip that was mailed to Texas from

16 Hawaii by the -- by Arnold and Evelyn Subia.

17 Q And that's related to count what?

18 A 17.

19 Q Okay. And Exhibit 135?

20 A 135 is the envelope that was used to mail 134.

21 Q And that's then related to Count 17 as well?

22 A Yes, it is.

23 Q All right. Count -- or Exhibit 136?

24 THE COURT: You going to put any of these in

25 evidence?

1 MR. SORENSON: Oh, I'm sorry.

2 THE COURT: You're up to 132. So I think 134, 135  
3 are not in evidence.

4 MR. SORENSON: Yeah, I think what we'll do, Your  
5 Honor, is go ahead and have her identify these again.

6 THE COURT: Okay.

7 THE WITNESS: And I'll move them en masse.

8 THE COURT: All right. Thank you. Sorry.

9 Q (BY MR. SORENSON:) All right. So starting -- we  
10 started at 132, okay? And I'll ask you once again, maybe we'll  
11 just do it all at once. Exhibits 132 through 141, do you see  
12 those?

13 THE COURT: 132's in. So 130 --

14 MR. SORENSON: 133 through 141?

15 THE COURT: Okay.

16 THE WITNESS: Yes, I see them.

17 Q (BY MR. SORENSON:) Okay. And what are these  
18 documents?

19 A These are documents relating to another client of  
20 MEI, Arnold and Evelyn Subia.

21 Q Okay. And are they along the same lines with the  
22 mailing and the invoice and the check?

23 A Yes. There's a welcome letter and they had a  
24 payment slip versus an invoice. But they would -- like  
25 Mr. Ventura, they would mail it in an envelope and send that

1 with their payment.

2 MR. SORENSON: Okay. Your Honor, at this time we'll  
3 move in 133 through 141.

4 THE COURT: All right. Any objections?

5 THE DEFENDANT: No objection.

6 THE COURT: Received.

7 (Exhibit 133-141 received into evidence.)

8 Q (BY MR. SORENSON:) All right. So let's go to first  
9 off 134. 134 and 135, are those both related to Count 17?

10 A Yes, they are.

11 Q And 134, I think you've indicated that was an  
12 invoice; is that correct?

13 A Yes, a payment slip.

14 Q And 135, is that the envelope for 134?

15 A Yes, it is.

16 Q And also related to Count 17?

17 A Yes, that's right.

18 Q All right. Exhibit 136, what is that?

19 A This is a payment slip that was sent in in July 2013  
20 by the Subias to MEI.

21 Q Is that related to Count 18?

22 A It is.

23 Q And Exhibit 137?

24 A Is the envelope used to mail in Exhibit 136.

25 Q All right. And 138?

1           A       This is a payment slip for the Subia payment to MEI  
2   in October 2013.

3           Q       And what count is that related to?

4           A       Count 19.

5           Q       All right. And Exhibit 139?

6           A       Is the envelope used to mail in Exhibit 138.

7           Q       Okay. Is that also related to Count 19, then?

8           A       Yes, sir, it is.

9           Q       And what is Exhibit 140?

10          A       The payment slip for the Subias' payment to MEI for  
11   November 2013.

12          Q       All right. And is that related to Count 20?

13          A       It is.

14          Q       Exhibit 141?

15                 THE COURT: Wait, just a sec. Are you okay?

16          No, no, no. All right. Go ahead.

17                 THE WITNESS: Exhibit --

18                 THE COURT: 139.

19                 THE WITNESS: I'm sorry.

20                 THE COURT: I think you're at 139, sorry.

21                 MR. SORENSON: Exhibit 141.

22                 THE COURT: Oh, I'm sorry.

23                 THE WITNESS: Exhibit 141 is the envelope used to  
24   mail Exhibit 140.

25          Q       (BY MR. SORENSON:) Okay. And then that's related

1 to?

2 A Count 20.

3 Q All right. Let me direct your attention over to  
4 142. What is 142?

5 A It is a cover page that seems to have -- would  
6 accompany the application for when a homeowner would sign up  
7 for the MEI mortgage reduction program.

8 MR. SORENSON: Your Honor, may we publish 142?

9 THE COURT: You may.

10 MR. SORENSON: Oh, first let me move for its  
11 introduction.

12 THE COURT: All right. Yes, that's right.

13 142, any objections, Mr. Williams?

14 THE DEFENDANT: I got to see it.

15 THE COURT: Okay.

16 THE DEFENDANT: No objection.

17 THE COURT: All right. Thank you. It's received.  
18 You may publish.

19 (Exhibit 142 received into evidence.)

20 MR. SORENSON: Okay. Your Honor?

21 THE COURT: Yes.

22 MR. SORENSON: Let me pull that up.

23 Q (BY MR. SORENSON:) Okay. Special Agent Crawley,  
24 you've indicated this was a part of the application process; is  
25 that correct?



1           A       It seems to be a cover page that would accompany the  
2 application.

3           Q       All right. Let me -- this top part here. And  
4 we're -- this is a -- it's kind of a -- looks like a fee page,  
5 would that be fair to say?

6           A       Yes, like a checklist of various fees to be paid.

7           Q       And it calls for a processing fee in this instance;  
8 is that correct?

9           A       Yes, that's right.

10          Q       And how much is that?

11          A       \$1,000.

12          Q       And also down below it says UCC and Mortgage Filing  
13 Recording Fee. Do you see that?

14          A       I do, yes.

15          Q       And how much was that?

16          A       For \$150 cash.

17          Q       So he's asking for cash here; is that correct?

18          A       Yes.

19          Q       And also down below --

20                   THE DEFENDANT: Objection.

21                   THE COURT: Yeah. What's -- you have to stand up.  
22 What's your objection?

23                   THE DEFENDANT: I didn't ask for cash.

24                   THE COURT: Okay. So when you cross-examine -- in  
25 cross-examination you can ask that. So overruled.

1 All right. You can repeat the question.

2 Q (BY MR. SORENSON:) Okay. UCC Mortgage Filing  
3 Recording Fee 150; is that correct?

4 A Yes, that's right.

5 Q And it says cash; is that correct?

6 A It does.

7 Q Okay. And below that, Document Research at BOC; is  
8 that correct?

9 A Yes.

10 Q \$200?

11 A Yes, sir.

12 Q Do you see "cash" next to the BOC; is that correct?

13 A Yes, I do.

14 Q And what, if you know, is the BOC?

15 A Is the Hawaii State Bureau of Conveyances.

16 Q And it looks like down below there's a charge for  
17 notary; is that correct?

18 A Yes.

19 Q And how much is that?

20 A \$100.

21 Q And these fees are separate and apart from the  
22 obligations that we've seen to pay one-half of your  
23 mortgage --

24 THE DEFENDANT: Objection. Speculation.

25 THE COURT: So let him finish his question.

1           So you're saying these are separate and apart from these?

2           MR. SORENSON: Yes, Your Honor.

3           THE COURT: And your objection is speculation?

4           THE DEFENDANT: That's correct.

5           THE COURT: Yes. Sustained.

6           Q       (BY MR. SORENSON:) Okay. We're going to move on to  
7 the next document. I'm going to ask you to look at 143. Okay.  
8 What is 143?

9           A       It is an income and commission schedule for  
10 associates working for Mortgage Enterprise Investments.

11           MR. SORENSON: All right. Your Honor, I'm going to  
12 move in 143 at this time.

13           THE COURT: All right. Any objection?

14           THE DEFENDANT: No objection.

15           THE COURT: Received.

16           (Exhibit 143 received into evidence.)

17           MR. SORENSON: And I'm not going to publish that,  
18 Your Honor, but I will ask for 144.

19           Q       (BY MR. SORENSON:) Could you identify 144?

20           THE WITNESS: Yes. 144 is a pamphlet brochure for  
21 Common Law Office of America.

22           MR. SORENSON: Your Honor, we would move for the  
23 introduction of 144.

24           THE COURT: Any objection?

25           THE DEFENDANT: No objection.

1 THE COURT: Received.

2 (Exhibit 144 received into evidence.)

3 MR. SORENSON: And we would ask for publication as  
4 well.

5 THE COURT: It may be published.

6 Q (BY MR. SORENSON:) Okay. Could you read this?

7 A (Reading:) "Our mission: The Common Law Office of  
8 America is dedicated to assist Americans to protect their  
9 constitutional and inalienable rights. Our trained staff will  
10 treat your situation as if it is their own. We pride ourselves  
11 in protecting our customers' constitutional rights and helping  
12 them achieve the American dream of life, liberty, and the  
13 pursuit of happiness. For mortgage assistance to sovereignty  
14 certification, we are a full-service common law office with  
15 offices throughout the United States. We are the leader in  
16 educating the American public and protecting their rights and  
17 property from unlawful infringement by government officials and  
18 law enforcement. Unlike other law offices, we guarantee our  
19 services and stand on the principles of fairness and acting in  
20 good faith."

21 Q Okay. So Mr. Williams uses the term "unlike other  
22 law offices," is that correct here?

23 A Yes, that's right.

24 Q And this is from the Common Law Office of America,  
25 correct?

1 A Yes, it is.

2 Q And I think you've testified earlier that you could  
3 not associate any actual lawyers with this operation; is that  
4 true?

5 A That's right.

6 Q And down below we just see Our Services; is that  
7 correct?

8 A Yes.

9 Q And the first one is mortgage reduction, right?

10 A Yes, that's right.

11 Q Foreclosure assistance?

12 A Yes.

13 Q And sovereignty certification?

14 A Yes.

15 Q Property tax assistance?

16 A Yes.

17 Q And peace officer certification?

18 A Yes.

19 Q What, if you know, is that?

20 A I don't know what peace officer certification is.

21 Q I'll ask you to direct your attention over to 145.  
22 What is 145?

23 A A pamphlet regarding attorneys in fact for the  
24 Common Law Office of America.

25 MR. SORENSON: All right. Your Honor, at this time

1 we'll move in 145.

2 THE COURT: Any objection?

3 THE DEFENDANT: No objection.

4 THE COURT: Received.

5 (Exhibit 145 received into evidence.)

6 MR. SORENSON: Your Honor, if we could just have a  
7 moment?

8 THE COURT: You may.

9 MR. SORENSON: Thank you.

10 Q (BY MR. SORENSON:) Okay. So you've identified 145;  
11 is that correct?

12 A Yes.

13 MR. SORENSON: And, Your Honor, we moved that in and  
14 you have --

15 THE COURT: Yes.

16 MR. SORENSON: -- allowed its submission. We would  
17 like to publish.

18 THE COURT: You may.

19 Q (BY MR. SORENSON:) Now, you've indicated 145 is  
20 another document that was seized from the Killeen, Texas,  
21 location; is that correct?

22 A Yes, that's right.

23 Q And you see at the top it says Attorneys In Fact; is  
24 that true?

25 A Yes.

1 Q And then there's a Private Attorney

2 General -- Private Attorney Generals with a statutory site; is  
3 that correct?

4 A Yes.

5 Q And Mr. Williams has identified four individuals  
6 here who he certifies here, I guess, or represents are Attorney  
7 Generals; is that correct?

8 A Yes.

9 Q And we see Anthony Williams's name there; is that  
10 true?

11 A Yes.

12 Q But we also see Yoseph Hezekyah as listed here as  
13 another person; is that correct?

14 A Yes, we do.

15 Q You've testified earlier that Yoseph Hezekyah is  
16 actually Anthony Williams; is that correct?

17 A Yes, according to the name change document.

18 Q Do you know who Tom Murphy is?

19 A I do not.

20 Q It represents here that the Common Law Office of  
21 America has a corporate office in Nashville, Tennessee; is that  
22 correct?

23 A It says that, yes.

24 Q All right. Let me direct your attention over to  
25 146, Exhibit 146, ask you if you can identify that. What is

1 146?

2 A Oh, I'm sorry. I didn't hear you. 146 is a letter  
3 from Common Law Office of America and Mortgage Enterprise  
4 Investments to a homeowner thanking them for their inquiry into  
5 the program and giving a little bit of information about the  
6 mortgage reduction program.

7 MR. SORENSON: Your Honor, we move 146 in.

8 THE COURT: Any objection?

9 THE DEFENDANT: No objection.

10 THE COURT: Received.

11 (Exhibit 146 received into evidence.)

12 MR. SORENSON: Your Honor, may we publish?

13 THE COURT: You may.

14 Q (BY MR. SORENSON:) All right. If you could, would  
15 you mind reading this letter?

16 A (Reading:) "Dear Homeowner, We would like to thank  
17 you for enquiry and considering Mortgage Enterprise  
18 Investments, a subsidiary of Common Law Office of America, to  
19 service your mortgage. Please be aware that this process is  
20 completely legal as we are merely acting on the language that  
21 is contained within every mortgage agreement which allows you  
22 as the borrower to have your mortgage serviced by the company  
23 of your choice, thereby cutting your current monthly mortgage  
24 payment in half and having you to pay off your current mortgage  
25 loan in half the required time. This service saves the average



1 homeowner tens of thousand of dollars and often times stops a  
2 looming foreclosure process. We at Mortgage Enterprise  
3 Investments are committed to providing you with premium service  
4 for the duration of the time that your mortgage will be  
5 serviced by our company. It is not uncommon for an existing  
6 home loan to be bought by another company to service the loan;  
7 however, it is very uncommon for a mortgage company to reduce  
8 the amount owed and the time remaining on an existing mortgage.  
9 This is what makes our company unique and we are slated to be  
10 the premiere company to service homeowners like yourself now  
11 and in the future utilizing this legal maneuver.

12           We hope you will make a life-changing decision by  
13 allowing us to service your mortgage, and you are only  
14 obligated to pay a \$500 file setup fee to begin the process.  
15 This fee is fully refundable only if we are unable to procure  
16 your mortgage successfully. We are looking forward to working  
17 with you to adjust and to restore integrity to the home-buying  
18 process by allowing you as the homeowner to be able to enjoy  
19 the most fundamental part of the American dream, true home  
20 ownership."

21           Q       Okay. So up top, Mr. -- or at least this document  
22 indicates that -- that the process is completely legal; is that  
23 correct?

24           A       Yes, that's right.

25           Q       And it states that they're "acting within the

1 language of every mortgage agreement which allows the borrower  
2 to have their mortgage serviced by the company of their  
3 choice," is that correct?

4 A Yes, it says that.

5 Q And down below in the next paragraph, it states  
6 that, The mortgage -- your mortgage will now be serviced by our  
7 company," is that correct?

8 A Yes, it does.

9 Q So it doesn't talk about eliminating a mortgage,  
10 right?

11 A Correct.

12 Q Talks about servicing the existing mortgage?

13 A Yes, it does.

14 Q And down at the very bottom, "Sincerely," do you see  
15 that?

16 A Yes, I do.

17 Q -- "Attorneys and Support Staff of MEI." Again,  
18 were you able to identify any licensed attorneys that were  
19 affiliated with MEI or represented them in any way?

20 A No, we were not.

21 Q All right. I'll direct your attention over to 147.  
22 What is 147?

23 A 147 is a -- another letter from Common Law Office of  
24 America and Mortgage Enterprise Investments to a homeowner once  
25 they have signed up for the program. They're thanking them for

1 letting them procure their mortgage and referring them to a  
2 client referral program where the homeowner can refer the  
3 program to friends and be compensated for that referral.

4 MR. SORENSON: Your Honor, we move 147 into  
5 evidence.

6 THE COURT: Any objection?

7 THE DEFENDANT: No objection.

8 THE COURT: Received.

9 (Exhibit 147 received into evidence.)

10 MR. SORENSON: And we move to publish.

11 THE COURT: You may.

12 Q (BY MR. SORENSON:) Special Agent Crawley, could you  
13 please read this?

14 A (Reading:) "Dear Homeowner, I hope you are pleased  
15 with the service that Mortgage Enterprise Investments, a  
16 subsidiary of Common Law Office of America, has provided to you  
17 in procuring your mortgage and, in turn, cutting your mortgage  
18 payment in half and your payoff in half the time.

19 This phenomenal legal loophole is still unknown by  
20 the masses of people that need it. We are hoping that you,  
21 like us at MEI, are committed to helping others. If so, MEI  
22 has formulated a phenomenal referral program or CRP that allows  
23 you to simply, by word of mouth, liking us on Facebook or  
24 forwarding an email to your family members and friends letting  
25 them know that you are pleased with the service we provided and

1    what achieving a successful end to this process has meant for  
2    you.  The MEI CRP program is just that easy.  Be sure that  
3    anyone that you refer to MEI knows your full name and the city  
4    and state that you reside in.  When any potential client of MEI  
5    makes an enquiry, they are always asked who referred them.  
6    Provided that referring person is an existing client of CRP,  
7    they will be paid \$150 per referral 30 -- 60 days after the new  
8    client has signed up for our program.  That's right, MEI keeps  
9    saving you money.  Who does that?  We do that here at MEI.

10               Once again, thank you for choosing Mortgage  
11   Enterprise Investments or MEI to service your existing  
12   mortgage.  Now go tell others and get paid."

13           Q       Now, what I want to ask about here is this term  
14   "service your existing mortgage," is that correct?

15           A       Yes.

16           Q       And is the representation here that Mr. Williams is  
17   going to service the existing mortgage?

18           A       Yes.

19               THE DEFENDANT:  Objection.  That's speculation.

20               MR. SORENSON:  Well, it states that.

21               THE COURT:  Well, you're asking -- overruled.  The  
22   document speaks for itself.

23               MR. SORENSON:  Yes, Your Honor.  Thank you.

24               THE DEFENDANT:  That's not what I'm saying.

25           Q       (BY MR. SORENSON:)  All right.  And down at the

1 bottom it says, "Sincerely," and who does it say it's sincerely  
2 from?

3 A "Attorneys and Support Staff with Mortgage  
4 Enterprise Investments."

5 Q All right. I direct your attention over to  
6 Exhibit 148. What is 148?

7 A It is a -- another letter from Common Law Office of  
8 America and Mortgage Enterprise Investments to the homeowner  
9 discussing how to begin the process of -- for MEI to procure  
10 their mortgage.

11 MR. SORENSON: Your Honor, at this time we'll move  
12 in 148.

13 THE COURT: All right. Any objection?

14 THE DEFENDANT: No objection.

15 THE COURT: Received.

16 (Exhibit 148 received into evidence.)

17 MR. SORENSON: May we publish?

18 THE COURT: You may.

19 Q (BY MR. SORENSON:) All right. I know how much fun  
20 this is, but could you read this also?

21 A (Reading:) "Dear Homeowner, we would like to thank  
22 you for allowing Mortgage Enterprise Investments, a subsidiary  
23 of Common Law Office of America, to service your mortgage. We  
24 are pleased and honored to provide this service for you and so  
25 many other Americans who deserve a real mortgage bailout. In

1 order to begin the process of procuring your mortgage from your  
2 current mortgage and/or finance company, we need you to provide  
3 us the following items: Your current -- your most recent  
4 mortgage statement, a copy of -- a copy of --, a copy of --.  
5 Once you have provided us with the above-requested documents,  
6 we will begin the process. This process takes on average 14 to  
7 28 days until all the necessary documents have been filed and  
8 all parties have been notified that Mortgage Enterprise  
9 Investments is now the service provider of your existing  
10 mortgage.

11 Please cease and desist from speaking by telephone  
12 and/or written correspondence to any parties. Henceforth, our  
13 in-house attorneys and support staff will handle any and all  
14 inquiries from the mortgage and/or finance company currently  
15 servicing your mortgage. If you should have any questions or  
16 concerns, please contact us at 877-714-1233, or leave an  
17 inquiry at [www.usacommonlaw.weebly.com](http://www.usacommonlaw.weebly.com).

18 Thank you again for choosing Mortgage Enterprise  
19 Investments or MEI to service your existing mortgage. We are  
20 looking forward to working closely with you toward a successful  
21 end and a new beginning for you as a homeowner."

22 Q And again we see the statement "service your  
23 existing mortgage," is that correct?

24 A Yes, we do.

25 Q And there's also a term here I wanted to ask you

1 about, a representation that their "in-house attorneys" are  
2 involved. Did you see that?

3 A I do, yes.

4 Q There's an instruction, "Please cease and desist  
5 from speaking by telephone or written correspondence to any  
6 parties. Henceforth, our in-house attorneys and support staff  
7 will handle any and all inquiries from the mortgage and/or  
8 finance company."

9 Is the instruction here to stop talking to your  
10 mortgage company?

11 A It is, yes.

12 Q And that the in-house attorneys will take care of  
13 things?

14 A Yes, that's right.

15 Q I direct your attention over to 149. What is 149?

16 A 149 is a letter from Mortgage Enterprise Investments  
17 to its customers letting them know that the payment method is  
18 transitioning to an a electronic bank draft.

19 MR. SORENSON: Your Honor, at this time we move in  
20 149.

21 THE COURT: Any objection?

22 THE DEFENDANT: No objection.

23 THE COURT: Received.

24 (Exhibit 149 received into evidence.)

25 Q (BY MR. SORENSON:) And without publishing 149, let

1 me just ask you, is this simply advising folks that they can  
2 now pay by electronic bank draft?

3 A Yes, that's right.

4 Q Let me direct your attention over to 150. What is  
5 Exhibit 150?

6 A It is a notice of fraud and intent to litigate from  
7 the Common Law Office of America Mortgage Compliance Division.

8 Q All right. And is it addressed to any particular  
9 entity?

10 A Yes, Wells Fargo Home Mortgage.

11 MR. SORENSON: All right. Your Honor, at this time  
12 we're going to move in Exhibit 150.

13 THE COURT: Any objection?

14 THE DEFENDANT: No objection.

15 THE COURT: Received.

16 (Exhibit 150 received into evidence.)

17 MR. SORENSON: Your Honor, may we publish?

18 THE COURT: You may.

19 Q (BY MR. SORENSON:) Okay. So we see the document on  
20 the screen. Do you have it up there?

21 A Yes.

22 Q I want to blow this top part up. Now, this purports  
23 to be a letter of correspondence from the Common Law Office of  
24 America; is that correct?

25 A Yes.



1           Q       And below it says, "Attorneys and Counselors at  
2 Law." Do you see that?

3           A       Yes, I do.

4           Q       And this is from apparently the mortgage compliance  
5 division?

6           A       Yes.

7           Q       And do you see the names that are listed on the  
8 letterhead here?

9           A       I do, yes.

10          Q       I wanted to ask you about a few of those names.  
11 First off, we see Anthony Williams's name; is that correct?

12          A       Yes, we do.

13          Q       And we also see the name Yoseph Hezekyah; is that  
14 correct?

15          A       Yes, we do.

16          Q       And I think you've testified earlier that this is  
17 another name for Mr. Williams, or at least you found evidence  
18 that that's another name for him?

19          A       Yes, that's right, according to to his name change  
20 document.

21          Q       Over here on the right, I see the name Troy Bocetti.  
22 Have you seen anything that links this identity with  
23 Mr. Williams as well?

24          A       Yes, we have.

25          Q       What have you seen?

1           A       Various sources, uhm, it's -- we've seen online  
2 through social media content --

3                   MR. WILLIAMS: Objection. That's hearsay.

4                   THE COURT: Wait. So you're offering it for what's  
5 part of her investigation and --

6                   MR. SORENSON: Yes, Your Honor.

7                   THE COURT: -- not for the truth of the matter?

8                   All right. Overruled on that basis.

9                   Okay. So you may give your answer. Where have you seen  
10 the name?

11                   THE WITNESS: We've seen it with online social media  
12 outlets and it is associated with one of Mr. Williams's PayPal  
13 accounts.

14           Q       (BY MR. SORENSON:) Now, if you could, I'm just  
15 going to direct you to the top part of this letter? Now, does  
16 this correspondence from Common Law Office of America give some  
17 form of notice to a bank lender?

18           A       Yes, to Wells Fargo Home Mortgage.

19           Q       What does it tell Wells Fargo?

20           A       That fraud discovered within Wells Fargo has  
21 been -- has been forwarded to the FBI and the Secret Service.

22           Q       And does it indicate that it's been forwarded for  
23 the purpose of investigation and prosecution resulting from  
24 violations of federal law?

25           A       Yes, it has.

1           Q       Including counterfeiting and conspiracy to defraud;  
2 is that correct?

3           A       Yes, that's what it says here.

4           Q       All right. And if you could, just look at  
5 Exhibit 151. What is 151?

6           A       This is a mailing we found that had this note inside  
7 of it, inside the envelope at the top of the page.

8           Q       All right. And does it relate to Mortgage  
9 Enterprise Investments?

10          A       It does, yes.

11                 MR. SORENSON: All right. Your Honor, we move in  
12 151.

13                 THE COURT: All right. Any objections?

14                 THE DEFENDANT: No objection.

15                 MR. ISAACSON: May I just inquire?

16                 THE COURT: Yes.

17                 Are you done with the exhibit that's on the screen?

18                 MR. SORENSON: Oh.

19                 THE COURT: Thanks.

20                 MR. SORENSON: Your Honor, may we publish?

21                 THE COURT: Wait. So is he objecting to 151?

22                 THE DEFENDANT: No.

23                 MR. SORENSON: He did not object, Your Honor.

24                 THE COURT: All right. So it's received.

25                 Yes, you may publish.

1 (Exhibit 151 received into evidence.)

2 Q (BY MR. SORENSON:) All right. Special Agent  
3 Crawley, when I look at this -- this note, this note states,  
4 "This is just to make sure that the postal service honor the  
5 U.S. Bankruptcy and recognize that all mail has been prepaid.  
6 Call me as soon as you get this."

7 Do you see that?

8 A Yes, I do.

9 THE COURT: It's not published. Do you have -- do  
10 you want to publish it?

11 MR. SORENSON: I'm going to publish it, Your Honor.

12 THE COURT: Oh, I'm sorry.

13 MR. SORENSON: I'm not going to show them that part.

14 THE COURT: Oh, okay.

15 MR. SORENSON: Thank you.

16 THE COURT: Uh-huh.

17 MR. SORENSON: Oops. Sorry, Your Honor, we are  
18 occasionally getting glitches with this system that where it  
19 just pops up one of our exhibits: These are all admitted.

20 THE COURT: Okay.

21 MR. SORENSON: All right. We'll switch over to this  
22 system for a moment. All right. Your Honor, I'm going to  
23 publish with the ELMO.

24 THE COURT: All right. We're going to switch the  
25 source then. Okay.

1           Q       (BY MR. SORENSON:) All right. Is this the  
2 envelope?

3           A       Yes, it is.

4           Q       And this -- was this, again, what appeared to be,  
5 based on your investigation, a mail stamp that was utilized by  
6 Mr. Williams instead of actually purchasing mail stamps?

7           A       Yes, that's right.

8           Q       All right. Let me direct your attention over to  
9 152. What is 152?

10          A       152 is an affidavit of common law notice of name  
11 change.

12          Q       All right. And what -- what person's signature is  
13 on there?

14          A       Anthony Williams.

15          Q       All right. And is it dated August 29th, 2011?

16          A       It is, yes.

17                 MR. SORENSON: All right. Your Honor, we move in  
18 Exhibit 152.

19                 THE COURT: All right. Any objection?

20                 THE DEFENDANT: No objection.

21                 THE COURT: Received.

22                 (Exhibit 152 received into evidence.)

23                 MR. SORENSON: Your Honor, may we publish?

24                 THE COURT: You may.

25          Q       (BY MR. SORENSON:) All right. Without going

1 through this in its entirety, I'll direct you to paragraph 4,  
2 "As of today, my name will officially and professionally be  
3 Yoseph Hadama Hezekyah."

4 Do you see that?

5 A I do, yes.

6 Q And there's a signature at the bottom. Do you  
7 recognize that signature?

8 A Yes, I do.

9 Q And whose signature is that?

10 A Anthony Williams's.

11 Q All right. And is this also notarized?

12 A It is, yes.

13 Q And apparently filed in Davidson County?

14 A Yes.

15 Q And this name Yoseph Hezekyah is the name that we  
16 saw on the letterhead; is that right?

17 A Yes, it is.

18 Q Represented to be a separate person, right?

19 A Yes.

20 Q Wasn't Yoseph Hezekyah also listed under the  
21 officers or as the owner of MEI?

22 A Yes, in the bylaws that we previously discussed.

23 Q Right. But Anthony Williams was also listed there  
24 as well, correct?

25 A Yes, that's right.

1           Q       Okay. I'll direct your attention over to 153. What  
2 is Exhibit 153?

3           A       This is one of the mortgages that MEI would create  
4 for its homeowners clients.

5           Q       Okay. And in this case, who's UCC financing  
6 statement is this?

7           A       This is a -- it's a mortgage, but it's for Nelson  
8 Madamba and Mariethez Madamba.

9           Q       I'm sorry. 153, if you could look at the very top  
10 part of that -- of the exhibit? Let me direct your attention  
11 there.

12          A       Yeah.

13          Q       Okay. And what does that say?

14          A       The very top of it?

15          Q       Top left corner.

16          A       So --

17          Q       Does that refresh your recollection as to what it  
18 might be?

19          A       This was one of the amended exhibits.

20          Q       Right.

21          A       So the mortgage has been -- was replaced --

22          Q       Oh, gotcha. I gotcha. Okay. Do you have 153 there  
23 before you?

24          A       I do, yes.

25          Q       Okay. What is 153?

1           A       153 is a mortgage that MEI would create for its  
2 homeowner clients that would be part of their mortgage  
3 reduction program.

4           MR. SORENSON: Okay. Your Honor, we move in 153 at  
5 this time.

6           THE COURT: Okay. Any objections?

7           THE DEFENDANT: No objection.

8           THE COURT: Received.

9           (Exhibit 153 received into evidence.)

10          MR. SORENSON: All right. May we publish?

11          THE COURT: You may.

12          Q       (BY MR. SORENSON:) And this particular mortgage,  
13 was it for any particular parties?

14          A       It was for Nelson Madamba and Mariethez Madamba.

15          Q       Okay. And as we look at the first page here, did  
16 you see other mortgages like this?

17          A       Yes, we did.

18          Q       For other individuals that used Mr. Williams's  
19 services?

20          A       Yes, that's right.

21          Q       And were these mortgages all filed with the Bureau  
22 of Conveyances?

23          A       Yes, they were.

24          Q       So I'm just going to blow up this middle part here.  
25 It states there at the top, "This mortgage security first day



1 of March 2015."

2 Do you see that?

3 A Yes, I do.

4 Q Now the grantors of this mortgage are Nelson Madamba  
5 and Mariethez Madamba; is that correct?

6 A Yes.

7 Q Husband and wife?

8 A Yes.

9 Q And in the next paragraph, the servicer mortgagee is  
10 listed as being MEI, correct?

11 A Yes.

12 Q And it says this is a business in Bell County,  
13 Texas; is that correct?

14 A Yes, it does.

15 Q And that is where Killeen, Texas, is?

16 A Yes, sir.

17 Q The next, line, though, it states and represents  
18 that there's a trustee; is that correct?

19 A It does.

20 Q Of this mortgage?

21 A Yes.

22 Q And the trustee is represented to be Federal  
23 Mortgage American Trust, correct?

24 A Yes.

25 Q And what is the address associated with that

1 business?

2 A 6230 Third Street, NW, No. 5, Washington, D.C.,  
3 20011.

4 Q And as a part of the FBI investigation into looking  
5 into whether this was actually a business, was an agent sent  
6 there to look at this and to talk to folks?

7 A Yes, that's right.

8 Q Now, the agreement also -- or the mortgage also  
9 states the secured party creditor and the beneficiaries are the  
10 Madambas; is that correct?

11 A Yes, it does.

12 Q So they're both secure-party creditor and the  
13 beneficiary, right?

14 A Yes.

15 Q And they have an exclusive and superior lien on this  
16 mortgage; is that what it says?

17 A Yes.

18 Q On this address which is 94-296 Loa Street, Waipahu,  
19 Hawaii, correct?

20 A Yes.

21 Q And was that their residence?

22 A Yes, it was.

23 Q All right. Let me take you back a page here. And  
24 I'm sorry this is so small.

25 Okay. So it states, "Borrower owes secured-party

1 creditors the principal sum of \$497,200," is that correct?

2 A Yes, it does.

3 Q So who's identified here as the borrowers?

4 A Nelson and Mariethez Madamba.

5 Q But I thought that they were also the secured-party  
6 creditors?

7 A They are.

8 Q Now, did you see this -- this kind of anomaly in all  
9 these mortgages you looked at?

10 A Yes.

11 Q And it also states, "This debt is evidenced by UCC  
12 financing statement dated March 30th, 2015," correct?

13 A Yes.

14 Q And what does it say about that UCC financing  
15 statement?

16 A That it provides a superior lien to the Madambas.

17 Q And just read that next sentence starting with  
18 "This."

19 A (Reading:) "This security instrument secures to  
20 secured-party creditors, A, the repayment of the debt evidenced  
21 by the note" --

22 Q Let me stop you there. So this is saying the  
23 secured-party creditors are secured in the debt evidenced by  
24 the note, right?

25 A Yes.

1 Q And the secured-party creditors are the Madambas?

2 A Correct.

3 Q And they're going to be repaid a debt from

4 the -- from the borrowers?

5 A Yes.

6 Q But they're the borrowers too?

7 A That's correct.

8 Q Okay. It also evidenced a debt of \$497,200; is that

9 correct?

10 A Yes, that's right.

11 Q Did the Madambas -- did you ever learn whether the

12 Madambas ever loaned anybody money or got money loaned to them?

13 A Only by their original lender.

14 Q Did Mr. Williams --

15 THE DEFENDANT: Objection. That's hearsay.

16 THE COURT: So --

17 THE DEFENDANT: She don't know whether they got

18 money loaned from them from the original mortgage company.

19 THE COURT: Right. So can you lay a foundation that

20 she --

21 MR. SORENSON: Your Honor, we don't need to pursue

22 it. Obviously there'll be other witnesses.

23 THE COURT: Okay. So it's withdrawn. All right.

24 MR. SORENSON: Forgive me for just a moment, Your

25 Honor, as we blow this second part up here.

1           Q       (BY MR. SORENSON:) Now, there's another clause in  
2 here; is that correct, the derivation clause?

3           A       Yes, that's right.

4           Q       All right. And this -- this purports to talk about  
5 this particular piece of property, this Loa -- Loaa Street  
6 address, correct?

7           A       Yes, it does.

8           Q       And there's more language down here, if you can just  
9 look at that bottom part "together with all improvements," this  
10 is the description of the property?

11          A       Yes.

12          Q       I think I'll back out of that before we go blind.

13                   Okay. I'd like to -- I'm not sure what exhibit  
14 number we have on this because we've changed it,  
15 but -- apologize, Your Honor. We have another exhibit we  
16 wanted to show, but it's just a numbering issue here.

17                   THE COURT: All right. Maybe this is a good time to  
18 take a recess?

19                   MR. SORENSON: Sure.

20                   THE COURT: All right. So, ladies and gentlemen,  
21 we'll take our final recess of the day. If you would leave  
22 your iPads and your notepads on your chair. And of course a  
23 reminder not to discuss the case, do any research or  
24 investigation. Of course, don't go on any social media about  
25 the trial.

1           Please rise for the jury. We're all on a 15-minute  
2 recess.

3                   (A recess was taken.)

4                   (Open court out of the presence of the jury.)

5           THE COURT: All right. The record will reflect the  
6 presence of Mr. Williams and counsel. Counsel, it's come to my  
7 attention one of the jurors wants to raise an issue, so I'm  
8 going to have her brought in separately before the rest of the  
9 jury so we can take up the matter. And I believe this is  
10 Ms. Claire Aoki, Juror No. 5. So with your permission, I'll  
11 excuse the witness and then we'll handle this matter and then  
12 we'll --

13                   MR. SORENSON: Thank you.

14                   THE COURT: -- bring her back.

15           So you can step down now.

16                   (Brief pause.)

17                   (Open court out of the presence of the jury.)

18           THE COURT: Ms. Aoki, why don't you have a seat.  
19 Take your seat.

20           And we'll give her a handheld microphone, if you would.  
21 Thank you.

22           All right. You may be seated. The record will reflect  
23 the presence of Mr. Williams and counsel and Ms. Aoki.

24           So, Ms. Aoki, you had mentioned to the courtroom manager,  
25 Ms. Elkington --

1           THE JUROR NO. 5: I'm not sure if it is a conflict  
2 of interest. My daughter's currently a student in New Jersey  
3 at Seton Hall. Her interest is political science, and she's  
4 looking for internships all over the place and so she was lucky  
5 to get some. And I remember seeing that flier of that Common  
6 Law Office of America in her room and she had mentioned that.

7           And so at this point I'm not sure where I stand as a  
8 mother and what to tell her. I mean, I can't tell her, but is  
9 there something that I can say? You know, she's looking up an  
10 internship and she's trying to get some here, she doesn't have  
11 any law degree. But, you know, "Oh, yeah, I don't need to have  
12 a law degree for that internship," and she's really trying, and  
13 I heard that name and so, you know, I'm concerned. I'm  
14 not -- I didn't hear --

15           THE COURT: You have to keep it closer to your  
16 mouth.

17           THE JUROR NO. 5: Oh. I didn't hear Mr. Williams's  
18 testimony yet, so I don't know. But as a mother, you know, I'm  
19 concerned, and seeing that flier, and -- and what to tell her.  
20 And I know I can't say too much, but I'm like really torn that,  
21 you know, I need to just say to stop, you know. She should try  
22 internships like the FBI, and she didn't get that, and  
23 different things, but I need to just as a mother to -- to tell  
24 her to stop. And, you know, right now she's doing ethics so  
25 she's not looking at internships, but I know that's the one

1 thing she was looking at. And I want her to be buyer beware of  
2 things.

3 And I don't know -- like I said, I didn't hear  
4 Mr. Williams's testimony, I -- I -- and, you know, and I don't  
5 know -- you know, I just heard one side. But I seen  
6 that -- that paper and then for some -- and then for some  
7 reason, you know, how you get a lot of swishing? All of a  
8 sudden she got a lot of swishing for mortgages.

9 You know, I don't know, maybe it's just out there in the  
10 internet, but I -- it's at the same time, you know, came home  
11 for winter break, how come, you know, you're getting all this?  
12 And I'm not sure if she's looking into things or what, but --

13 THE COURT: Okay. Okay. So -- so you're --

14 THE JUROR NO. 5: What -- 'cause I --

15 THE COURT: One of us can speak at a time. Okay.  
16 So your concern is a conflict having to do with your daughter  
17 as opposed to a conflict of being a juror in this case. You  
18 feel conflicted how much can you discuss what you've learned in  
19 court; would that be fair to say?

20 THE JUROR NO. 5: Yes.

21 THE COURT: And your concern is because your  
22 daughter has made an application?

23 THE JUROR NO. 5: I'm not sure where she got, but  
24 she said oh, that, you know, she saw this, you know, in New  
25 Jersey, close to New York, right? And so, you know, it --



1           THE COURT: Wait, wait. So -- so you saw that there  
2 was -- there was an internship that's available with the Common  
3 Law Office of America?

4           THE JUROR NO. 5: Yeah. So that's what I think.  
5 I'm not sure, but I can't ask her. But I remember seeing that  
6 flier. And then she's a graduate of Hawaii Baptist Academy,  
7 so, you know, I don't know if it's a Hezekyah, if that's -- you  
8 know, I'm just -- I just feel like --

9           THE COURT: Okay. So your concern is whether or  
10 not -- or how much you can disclose to her of what's the  
11 testimony in court?

12          THE JUROR NO. 5: Yes. And as a point, I want to  
13 tell her, you know, just concentrate on your studies and just  
14 forget about internships, but she's really hard head. You  
15 know, like just concentrate of your studies. And why -- like I  
16 say, I didn't hear his testimony, but then as a mother I feel  
17 like I need to protect my daughter.

18          THE COURT: Right. So -- so you have a general  
19 concern that you're not a fan of her getting an internship  
20 anywhere; you would rather her concentrate on her studies.

21          THE JUROR NO. 5: I do, yeah.

22          THE COURT: Okay.

23          THE JUROR NO. 5: I mean, we told her that and, you  
24 know -- and she kind of thought about that --

25          THE COURT: So that feeling has nothing to do with

1 the Common Law Office of --

2 THE JUROR NO. 5: No, it does.

3 THE COURT: -- America?

4 THE JUROR NO. 5: I saw a flier in her room with the  
5 Common Law Office.

6 THE COURT: Right.

7 THE JUROR NO. 5: So when they showed the flyer, it  
8 was like Oh, you know, that looks like the flier --

9 THE COURT: Right. You would like her to have a  
10 internship, just not with the Common Law Offices of America?  
11 You want her to get an internship somewhere.

12 THE JUROR NO. 5: No, I don't want her to get one  
13 right now.

14 THE COURT: All right.

15 THE JUROR NO. 5: But she's looking for one --

16 THE COURT: Right.

17 THE JUROR NO. 5 -- but I'm telling her wait, study,  
18 maybe next year.

19 THE COURT: Okay. So if I understand you, it has  
20 nothing to do with Common Law -- not nothing -- it's not  
21 because of Common Law Office of America, but in general you'd  
22 rather her pursue her studies rather than get an internship so  
23 that she doesn't lose her focus on her studies; is that  
24 correct? You'd rather her do her studies than an internship  
25 with anyone?

1           THE JUROR NO. 5: Uhm, next year if she wants to do  
2 an internship, you know, that's fine. But I'm just -- you  
3 know, from some of the testimony that's coming out about the  
4 names and knowing that, you know, this is something that she  
5 might want to apply to and I would have a concern, and I'm  
6 sorry, it's just that mother instinct where I'm trying to  
7 protect my daughter.

8           THE COURT: Sure. No, I understand that.

9           Okay. So do you have any questions from the government  
10 with regard to Ms. Aoki's concern?

11          MR. SORENSON: Maybe just one, Your Honor.

12          THE COURT: All right. Please, go ahead.

13          MR. SORENSON: Ms. Aoki, I just want to get dialed  
14 in just a tad here.

15          THE JUROR NO. 5: Wait. Let me put my ears on.

16          THE COURT: Yeah, if you could go by the microphone.  
17 Great.

18          MR. SORENSON: You've actually seen a placard or  
19 some type of brochure?

20          THE JUROR NO. 5: I think I did. I'm not real sure,  
21 but I think I did. I think I saw it in her room. And when she  
22 did mention, you know, something and I thought she said -- I'm  
23 not sure -- I started looking at my email to see what, you  
24 know, email she sent me, but it sounded like that. But I'm not  
25 sure, but it sounded like that and sounded like something I

1 might have saw. But I'm not hundred percent. But, you know,  
2 that -- that Hezekyah, and --

3 MR. SORENSON: Okay. Is -- I guess my question is  
4 is there anything about what you've seen that would affect your  
5 ability to be impartial in this case for either party, and also  
6 to keep your oath to the Court to not discuss what's going on?

7 THE JUROR NO. 5: Yeah, so I wouldn't discuss it;  
8 however, I would like to send a text, email, something that  
9 says, Hey, listen to your mom. Don't think about any -- any  
10 internship, because I feel like I need to, you know, let her  
11 know, you know.

12 She has ethics so she's busy now, but after February she's  
13 going to be looking and sometimes she doesn't listen to me,  
14 but -- and I know she's wanting to get, you know, a job.

15 THE COURT: Well, so -- so this is sort of the  
16 bottom line is you're her mother, so you can tell her no  
17 internship or I don't think you should do an internship, you  
18 should concentrate on your studies. Okay. That's sort of  
19 separate and apart from this case.

20 What Mr. Sorenson and myself and Mr. Williams are  
21 interested in is anything that you saw in your daughter's  
22 emails or pamphlets or flyers that you may have seen, would  
23 that affect your ability to be fair and impartial in this case  
24 to both sides, what you saw in your daughter's room or you got  
25 text from her or emails?

1           THE JUROR NO. 5: Well, I guess -- I guess to be  
2 honest, I would tell her not -- you know I would ask her, you  
3 know --

4           THE COURT: No, no, I'm sorry, not having to do with  
5 telling -- what you want to tell your daughter. I'll ask you  
6 about that. But right now as you sit here today, is there  
7 something that you saw in your daughter's room --

8           THE JUROR NO. 5: No.

9           THE COURT: -- or your emails or text that makes you  
10 feel you couldn't be fair to the government or you couldn't be  
11 fair to Mr. Williams?

12           THE JUROR NO. 5: I guess -- like I said, I didn't  
13 hear Mr. Williams's -- so I -- testimony, so, you know, he's  
14 innocent until proven guilty and that's what I -- I need to  
15 learn and I guess we're just hearing like, you know, the  
16 statements.

17           But I -- I think I can. Just sometimes thinking about my  
18 daughter and her choices may keep me a little distracted a  
19 little bit, but I think I can be -- you know, what can I say to  
20 her.

21           THE COURT: Right. So you're more concerned about  
22 what you can say to your daughter. That's what you're  
23 concerned. And your concern is that first you don't want her  
24 to take any internship; you rather have her be in studies --

25           THE JUROR NO. 5: For this semester.

1 THE COURT: -- and second you don't want her to do  
2 an internship with the Common Law Office of America.

3 THE JUROR NO. 5: That's correct.

4 THE COURT: All right. So do you have any questions  
5 for Ms. Aoki, Mr. Williams?

6 THE DEFENDANT: Yes. Your daughter lives here?

7 THE JUROR NO. 5: No.

8 THE DEFENDANT: Where does she lives at?

9 THE JUROR NO. 5: She's in the mainland.

10 THE DEFENDANT: In what state?

11 THE JUROR NO. 5: In New Jersey.

12 THE DEFENDANT: Well, my office doesn't offer an  
13 internship, so that definitely couldn't have been my office.

14 THE JUROR NO. 5: Okay. 'Cause -- 'cause she does  
15 have the pamphlet. I'm pretty sure if I go home today and I  
16 look for it, it's probably there. I don't know for sure, but I  
17 saw that form before.

18 THE COURT: Okay. So.

19 THE JUROR NO. 5: And so --

20 THE COURT: So he doesn't offer -- or Common Law  
21 Office of America doesn't offer internships.

22 THE JUROR NO. 5: At all?

23 THE DEFENDANT: No.

24 THE JUROR NO. 5: Okay. Any work opportunities?

25 THE DEFENDANT: Definitely work opportunity --

1 THE JUROR NO. 5: Okay. Maybe work opportunities?

2 MR. WILLIAMS: Yeah, but not no internship.

3 THE COURT: Okay. So like --

4 THE JUROR NO. 5: Or could be work opportunities  
5 also.

6 THE COURT: Okay. So she would leave school and  
7 work full-time at least for Common Law --

8 THE JUROR NO. 5: Well, this is like a -- it would  
9 be a part-time or what she was describing.

10 THE COURT: Okay.

11 THE JUROR NO. 5: Just, you know, when her  
12 classes -- when she's not in class, then she can go.

13 THE COURT: Is that even an opportunity in New  
14 Jersey for part-time work?

15 THE DEFENDANT: No. I got a office in New York, but  
16 not New Jersey.

17 THE COURT: Okay.

18 THE DEFENDANT: You know, I don't know about maybe  
19 somebody did with -- you know, my former employees did here and  
20 maybe somebody done use my name and my company like they've  
21 done here. I don't know.

22 THE COURT: Right.

23 THE DEFENDANT: But I'm glad I know that 'cause now  
24 I can see what's going on. See if somebody else done the same  
25 thing as what --

1 MR. SORENSON: Your Honor, I'm not sure, but --

2 THE COURT: Anyway, with regard to your New York  
3 office, are you offering any part-time work to college  
4 students?

5 THE DEFENDANT: Not that I -- not that I've  
6 authorized.

7 THE COURT: Yeah. So, you know, I don't know what  
8 that pamphlet has to do with anything. You're certainly her  
9 mother, so you can tell her, you know, whatever you think is  
10 appropriate for parenting. You just can't disclose the  
11 testimony and discuss the issues in this case with her.

12 THE JUROR NO. 5: Okay. Just --

13 THE COURT: So apparently from a practical  
14 standpoint, according to Mr. Williams, there's no internship  
15 opportunity and there's no part-time work that she could apply  
16 for as a college student.

17 THE JUROR NO. 5: Or -- or like just, you know,  
18 internships or -- he doesn't have any internships?

19 THE COURT: Right. He says he has no internships,  
20 and it would be in New York, not New Jersey.

21 THE JUROR NO. 5: Yeah, it would be in New York.  
22 It'd be the New York office --

23 THE COURT: Okay.

24 THE JUROR NO. 5: -- 'cause it's close by.

25 THE COURT: So if he has no internships, she can't



1    apply for internships.  And if he has no part-time job for  
2    college student --

3                   THE JUROR NO. 5:  Or volunteer.

4                   THE COURT:  Well, I mean --

5                   THE JUROR NO. 5:  Okay.

6                   THE COURT:  But that's -- you can certainly talk to  
7    her as a parent.  You just can't disclose any of the testimony  
8    and your thoughts about the testimony to your daughter until  
9    after the whole case is over.

10                  THE JUROR NO. 5:  So if I --

11                  THE COURT:  But this whole case will be over in  
12   March in a few weeks, so after the case is over, you can talk  
13   to your daughter.

14                  THE JUROR NO. 5:  Okay.

15                  THE COURT:  So do you think she's going to apply for  
16   something and get a job in the next, you know, four weeks?

17                  THE JUROR NO. 5:  I think ethics though is in -- at  
18   the end of February.

19                  THE COURT:  Yeah.

20                  THE JUROR NO. 5:  Or mid February.

21                  THE COURT:  Right.  So she's not going to have any  
22   time to do it, right?  So once the case is over, you'll be able  
23   to discuss the case openly and freely once, you know, the jury  
24   has been discharged.  So there should be time for you to talk  
25   to her.

1           THE JUROR NO. 5: Okay. And so for now just say  
2 please don't do any volunteer work or any internships or  
3 anything?

4           THE COURT: Right, in general, not specifically  
5 mentioning Common Law Office of America.

6           THE JUROR NO. 5: Okay.

7           THE COURT: Yeah. So don't discuss anything having  
8 to do with that or the Mortgage Enterprise company. But you  
9 can once the case is over and the jury's been discharged.

10          THE JUROR NO. 5: Okay.

11          THE COURT: Does that make sense? Do you have any  
12 questions?

13          THE JUROR NO. 5: No, as long as I can call her and  
14 just reiterate that.

15          THE COURT: Okay. Very good. All right. Why don't  
16 you have a seat there.

17          Any questions, concerns, objections anybody wants to raise  
18 with regard to what Ms. Aoki has raised before the Court?

19          MR. SORENSON: Your Honor, I'm just a little  
20 concerned that she hasn't been clear enough about being able to  
21 be impartial, just that affirmative statement both from  
22 Mr. Williams and for the government. I think we both want to  
23 know that she can be, and if she feels like she can't be, then  
24 we might have a different position.

25          THE COURT: Okay. So I guess the question is,

1 Ms. Aoki, you know, I know you're concerned about your daughter  
2 and what you can tell her. I think we've covered that, that  
3 you can't talk to her about the case until it's over.

4 But there's another part of it that I asked you a little  
5 bit earlier which is because you saw this pamphlet in your  
6 daughter's bedroom and she may have emailed you or texted you  
7 about it, do you think that's going to affect your ability to  
8 be open-minded until all the evidence comes in and to be fair  
9 to both the government and Mr. Williams in listening to all of  
10 the evidence?

11 THE JUROR NO. 5: I think -- I think I can. I can.

12 THE COURT: All right. So that's all we can ask is  
13 that people give their best efforts. And so -- and I'm always  
14 suspicious when people say, "Absolutely," you know, "I'm a  
15 complete open mind."

16 But when -- both sides, though, have the right to have  
17 jurors who are going to use their best effort to keep an open  
18 mind, wait until all the evidence is in and until they sit down  
19 with their fellow jurors to discuss the case.

20 Is that something that you can promise to us that you will  
21 do in this case?

22 THE JUROR NO. 5: Yes, I will.

23 THE COURT: Okay. Do you have any questions?

24 MR. SORENSON: No, Your Honor. Thank you very much.

25 THE COURT: Any questions, Mr. Williams?

1 MR. WILLIAMS: (No response.)

2 THE COURT: Okay. Pass for cause, Mr. Sorenson?

3 MR. SORENSON: Yes, Your Honor.

4 THE COURT: Pass for cause, Mr. Williams?

5 THE DEFENDANT: Can I reserve it?

6 THE COURT: Okay. You either got to decide now -- I  
7 mean, you have to either object now or not or ask her  
8 questions, but there's no basis for me to strike her for cause.

9 THE DEFENDANT: Yeah, I mean, 'cause I think she  
10 still going to have that in her mind. You know what I mean?  
11 So I don't know what she saw and maybe somebody -- you know  
12 what I mean?

13 THE COURT: Right.

14 MR. WILLIAMS: I mean, that's the reason why I'm  
15 here now because some former employees, what they did, so I  
16 don't know.

17 THE COURT: Okay. All right. So I don't see a  
18 basis to strike her for cause at this time given her answers to  
19 the questions that were raised, and what the issue is. I think  
20 it's more a greater concern about her daughter and what her  
21 daughter should be doing with regard to her studies.

22 Okay. So why don't you sit there. We'll take the  
23 microphone from you and we're going to bring the rest of your  
24 colleagues back. All right?

25 We're in recess.

1 (A recess was taken.)

2 THE COURT: Yes, Mr. Williams? We're not on the  
3 record. Did you want to be on the record?

4 MR. WILLIAMS: Yes, ma'am.

5 THE COURT: Okay.

6 MR. SORENSON: Your Honor?

7 THE COURT: Yes.

8 MR. SORENSON: There's a juror in the box.

9 THE COURT: Yes.

10 MR. SORENSON: I'm a little concerned about --

11 THE COURT: Right.

12 MR. SORENSON: -- the dialog, so --

13 THE COURT: Yes. So I'm going to -- before we go  
14 back to the record, I'm going to have her escorted out.

15 MR. SORENSON: Okay. Thank you.

16 THE COURT: Yeah. All right. So, Donna, if you  
17 would escort Ms. Aoki out and just have her wait in the hallway  
18 until we finish.

19 (Open court out of the presence of the jury.)

20 THE COURT: All right. The record will reflect  
21 Ms. Aoki's no longer in the courtroom. There are no jurors  
22 present. Present are counsel and Mr. Williams.

23 Mr. Williams?

24 THE DEFENDANT: Yeah. I just want it noted on the  
25 record that I do not feel that she would be able to overcome

1 her reservations 'cause she seemed to be very emotional about  
2 her daughter, you know, and she seems to already has her mind  
3 made up, hasn't even heard my side, hasn't seen none of my  
4 exhibits, hasn't heard any of my witnesses.

5 I just don't feel like she would be able to overcome it,  
6 so I just want to put my objection on the record.

7 THE COURT: All right. I appreciate that. And the  
8 court reaffirms its prior rulings for the reasons stated.  
9 Thank you.

10 Is there anything else we need to put on the record?

11 MR. SORENSON: Not from us, Your Honor. Thank you.

12 THE COURT: All right. We're in recess.

13 (A recess was taken.)

14 (Open court in the presence of the jury.)

15 THE COURT: And the record will reflect the return  
16 of our ladies and gentlemen of the jury. We're in the home  
17 stretch, so we have 20 more minutes. The record will also  
18 reflect the presence of the attorneys and Mr. Williams.

19 And, Mr. Sorenson, your witness.

20 MR. SORENSON: Thank you, Your Honor.

21 Q (BY MR. SORENSON:) First off, Special Agent  
22 Crawley, just a couple little items of housekeeping here.

23 I want you to look at Exhibit 723. We're going to  
24 go back to the bank exhibits, and I'll ask you if you can  
25 identify that.

1           A       Yes. This is a second account at Wells Fargo under  
2 Mortgage Enterprise Investments and Anthony Williams.

3           Q       And what are the last four digits of that account?

4           A       6009.

5           MR. SORENSON: Your Honor, at this time I would move  
6 in 723.

7           THE COURT: Any objections?

8           MR. ISAACSON: I'm sorry. What was the number of  
9 the exhibit?

10          THE COURT: 723.

11          MR. SORENSON: 723.

12          Q       (BY MR. SORENSON:) And I think you indicated those  
13 are bank records of Mortgage Enterprise Investments?

14          A       Yes.

15          Q       And do they have a signature card?

16          A       Yes, they do.

17          Q       All right. And who is on that signature card?

18          MR. ISAACSON: Your Honor --

19          THE COURT: Wait for just a moment. I think they're  
20 getting the exhibit, if you could just give them a little bit  
21 of time.

22          THE DEFENDANT: No objection.

23          THE COURT: All right. Thank you.

24          MR. SORENSON: Thank you. We don't need to publish  
25 that, Your Honor. Thank you.

1 THE COURT: Okay.

2 Q (BY MR. SORENSON:) All right. I want to direct  
3 your attention to 126, which purports to be a record from  
4 Extraco also?

5 A Yes.

6 Q All right. What is 126?

7 A 126 is a record that we received from Extraco and it  
8 is a check deposit -- a picture of the check that was deposited  
9 into the Extraco Bankruptcy Reform Act account. One of the  
10 checks Melvyn Ventura wrote. This particular one is the  
11 August 2015 mortgage payment that he wrote to MEI.

12 Q Does it relate to a couple other exhibits that came  
13 in earlier?

14 A Yes, it did.

15 Q The envelope and an invoice?

16 A Yes, that's correct.

17 Q Okay. And does it relate to a count?

18 A It does, yes. It relates to Count 30. Excuse me.

19 Q Count?

20 A 30.

21 Q 30. Thank you. Okay.

22 Now in the context of your investigation, I think  
23 you indicated that at one point you'd done some surveillance of  
24 Mr. Williams; is that correct?

25 A Yes, that's right.



1           Q       And where did you do surveillance?

2           A       At the airport here in Honolulu.

3           Q       And when you were doing surveillance, did you have

4 occasion to see Mr. Williams?

5           A       I did, yes.

6           Q       And where did you see him?

7           A       At the gate in Honolulu at the airport.

8           Q       And did you speak with him while you were there?

9           A       I did not.

10          Q       Did he know you were there?

11          A       Not that I know of.

12          Q       Okay. And did you take a photograph or two of him

13 at that time?

14          A       I did, yes.

15          Q       Were they photographs that were taken with his

16 knowledge at that time?

17          A       Not that I know of.

18          Q       Okay. I'm going to direct your attention over to

19 Exhibit 600 and ask you if you can identify it. What is 600?

20          A       This is one of the pictures that I took while

21 conducting surveillance of Mr. Williams.

22          Q       Is Mr. Williams in that photograph?

23          A       Yes, he is.

24          Q       And I think you indicated earlier that you were

25 there because --

1 MR. ISAACSON: Your Honor, we're still retrieving  
2 it.

3 THE COURT: I'm sorry?

4 MR. ISAACSON: We're retrieving it.

5 THE COURT: Okay. Well, if you could let us know,  
6 then we'll hold up on the questioning. Okay.

7 MR. WILLIAMS: I have no objection.

8 THE COURT: All right. Thank you. Well --

9 MR. SORENSON: Thank you.

10 THE COURT: -- I don't know if you were going to  
11 move it in, but it's received.

12 MR. SORENSON: I move it in.

13 (Exhibit 600 received into evidence.)

14 THE COURT: All right. Very good. It's late in the  
15 day; we're going to move everything.

16 All right. So your next question?

17 MR. SORENSON: Your Honor, may we publish?

18 THE COURT: You may.

19 Q (BY MR. SORENSON:) And before I publish, let me  
20 just ask you, this was a photograph I think you indicated you  
21 took because Mr. Williams was flying out of Hawaii that day,  
22 true?

23 A Yes, that's correct.

24 Q And he was going I think you indicated to Florida;  
25 is that correct?

1           A       Yes.

2           Q       And he was -- at that point there were other  
3       investigative actions that were going to occur in Florida --

4                   THE DEFENDANT:  Objection.  He's leading -- he's  
5       leading her.

6                   MR. SORENSON:  I think she testified to that  
7       earlier, Your Honor.  I'm just kind of catching us up.

8                   THE COURT:  All right.  So you're right, he is  
9       leading her.  I'll permit it 'cause it's foundational and we'll  
10      tie this up.  So overruled.  And then ask her the question.

11           So he was about to leave to go to Florida, and your  
12      question?

13           Q       (BY MR. SORENSON:)  Right.  And there were other  
14      investigative acts that were going to occur in Florida, I think  
15      you indicated, and that's why you were looking at him?

16           A       Yes, that's correct.

17           Q       Surveilling him?

18           A       Yes, that's correct.

19           Q       Okay.  This is Exhibit 600.  All right.  Is this  
20      Mr. Williams in the photograph on the phone?

21           A       It is, yes.

22           Q       All right.  All right.  Now, I see here something on  
23      his belt.  Do you see that, that kind of gold shiny thing?

24           A       I do, yes.

25           Q       What is that?

1           A       It's a -- a gold metal badge to kind of mimic the  
2 law enforcement metal badge.

3           Q       And was this item later seized from him or at least  
4 one that appeared to be it?

5           A       Yes, that's right.

6           Q       All right. And if you could look at 601. What is  
7 601?

8           A       601 is a picture taken of the same surveillance.  
9 It's just -- was taken at a different time and so  
10 he's -- Mr. Williams is sitting in a different position.

11          Q       But it's just Mr. Williams still sitting there at  
12 the gate; is that correct?

13          A       Yes, that's correct.

14                 MR. SORENSON: All right. Your Honor, we move 601  
15 in, although I'm not going to bother publishing it.

16                 THE COURT: Any objection?

17                 THE DEFENDANT: No objection.

18                 THE COURT: All right. Received.

19                 (Exhibit 601 received into evidence.)

20                 MR. SORENSON: Okay. Thank you, Your Honor.

21          Q       (BY MR. SORENSON:) Now, Special Agent Crawley, in  
22 the context of this litigation or this case, I think in your  
23 investigation we've seen several exhibits indicating that  
24 Mr. Williams or others were represented to be attorneys; is  
25 that correct?

1           A       Yes, that's right.

2           Q       And did you become familiar with any documents from  
3       federal district court here that addressed Mr. Williams  
4       appearing in court representing individuals in their home  
5       mortgage litigation?

6           A       Yes, I did.

7           Q       What did you find?

8           A       It was a judgment from a federal judge,  
9       Judge Mollway.

10          Q       Okay. And would you recognize it if you saw it  
11       today?

12          A       I would, yes.

13          Q       I'm going to direct your attention over to  
14       Exhibit 800.

15                   MR. ISAACSON: One moment, Your Honor.

16                   THE COURT: Yes.

17          Q       (BY MR. SORENSON:) Now, you were here for  
18       Mr. Williams's opening statement; is that correct?

19          A       Yes, I was.

20          Q       Did you hear him say that he had never represented  
21       to anyone that he was an attorney who could represent people?

22          A       Yes, that's right.

23          Q       And that he'd never been told that he could not  
24       represent people by any court?

25          A       Yes, correct.

1           Q       In looking at Exhibit 800, is this the order from  
2 the federal court here on this subject matter?

3           A       Yes, it is.

4           MR. SORENSON: Your Honor, we move this in as  
5 Exhibit 800.

6           THE COURT: All right. Objection?

7           THE DEFENDANT: No objection.

8           THE COURT: All right. Received.

9           (Exhibit 800 received into evidence.)

10          MR. SORENSON: Your Honor, may we publish?

11          THE COURT: You may.

12          Q       (BY MR. SORENSON:) Okay. We'll start up here at  
13 the top. You see that?

14          A       I do.

15          Q       Henry Malinay, do you see that name?

16          A       Yes.

17          Q       And Mr. Malinay, was he associated with Mr. Williams  
18 in this case?

19          A       Yes, he was.

20          Q       How so?

21          A       He was an associate of Mortgage Enterprise  
22 Investments.

23          Q       Was he also a client?

24          A       Yes, he was.

25          Q       And did Mr. Williams undertake or attempt to

1 undertake to represent Mr. Malinay?

2 A Yes.

3 Q And this was an action against a Rhonda Nishimura;  
4 is that correct?

5 A Yes, that's right.

6 Q First Circuit Court, State of Hawaii. You see that?

7 A Yes.

8 Q Who was Rhonda Nishimura, if you know?

9 A I don't know, to be honest.

10 Q All right. Go down to the order. Do you see where  
11 it says Order Dismissing Complaint?

12 A Yes.

13 Q All right. If you could, read this to the jury.

14 A (Reading:) "On July 26, 2013, Henry and Marilyn  
15 Malinay filed the present action. The Complaint in this matter  
16 was not signed by either Henry or Marilyn Malinay. It was  
17 instead signed by Anthony Williams, who, while purporting to be  
18 a private attorney general, is not a member of the bar such  
19 that he can represent others before this court.

20 On August 5th, 2013, the court issued an Order to  
21 Show Cause Why Complaint Should Not Be Dismissed Because  
22 Anthony Williams Is Not an Attorney Who Is Licensed to Practice  
23 Law Before this Court.

24 On August 5th, 2013, Williams filed a response as  
25 the, quote, "private attorney general," end quote, for the

1 Malinays. According to exhibits attached to that document, the  
2 Malinays gave a Statutory Form Power of Attorney" --

3 Q Excuse me. Does it say "Statutory Short Form Power  
4 of Attorney"?

5 A Excuse me. Yes, it does.

6 Q That's okay. I'm going to get out of this and go  
7 down a little bit more to the next page. And if you can take  
8 it up, I think it said, "To the Common Law Office of America,"  
9 is that correct?

10 A Yes.

11 Q Okay. Go ahead.

12 A (Reading:) "Even assuming that these are valid  
13 powers of attorney, Williams may not represent the Malinays as  
14 their attorney in this matter.

15 The court starts by recognizing that, in all courts  
16 of the United States, quote "parties may plead and conduct  
17 their own cases personally or by counsel," end quote. See  
18 28 U.S.C. 1654. However, the right to proceed pro se in civil  
19 cases is a personal right. See C. E. Pope Equity Trust" --

20 Q Now, the term pro se, are you familiar with what  
21 that term means?

22 A I am, yes.

23 Q And what does it mean?

24 A That an individual has a right to represent  
25 themselves in court.



1           Q       All right. And then it says "See" and it gives a  
2 case cite; is that correct?

3           A       Yes.

4           Q       All right. And then the case cite then is followed  
5 by some information in parens. What does that say?

6           A       (Reading:) "Although a non-attorney may appear in  
7 propria persona in his own behalf, that privilege is personal  
8 to him... He has no authority to appear as an attorney for  
9 others than himself."

10          Q       And again, this order was issued after Mr. Williams  
11 showed up and tried to represent Mr. Malinay; is that correct?

12          A       Yes, this is in response to that.

13          Q       All right. If you could read on?

14          A       (Reading:) "Nor does a power of attorney that  
15 allows Person A to act on behalf of Person B give Person A the  
16 right to act as Person B's attorney. A power of attorney  
17 allows Person A to do on behalf of Person B matters for which  
18 an attorney's license is not required. Person A may sign  
19 checks or loan documents, for example, but may not provide  
20 legal representation if not licensed to practice law. See In  
21 Regards to Foster 2012 WL 6554718, (9th Circuit).

22          Q       Don't worry about reading that cite, please.

23          A       Thank you.

24          Q       Sorry. And go ahead and continue with the  
25 information that's in the parens.

1           A           (Reading:) "Concluding that an attorney-in-fact, as  
2   opposed to an attorney-at-law, is not authorized to sign a  
3   complaint or otherwise appear on behalf of a principal."

4           Q           All right. Now, that's one thing I want to ask you  
5   about. On some of the earlier documents that we saw from  
6   Mr. Williams, there were representations that he or others from  
7   CLOA were attorneys in fact; is that correct?

8           A           Yes, that's right.

9           Q           All right. And this states that "Concluding that an  
10   attorney-in-fact, as opposed to an attorney-at-law, is not  
11   authorized to sign a complaint or otherwise appear on behalf of  
12   a principal"?

13          A           Right.

14          Q           Is that correct?

15                   THE DEFENDANT: Objection. She's not an expert in  
16   law.

17                   THE COURT: Sustained, unless you've laid a  
18   foundation that she can testify about the law.

19                   MR. SORENSON: Okay.

20          Q           (BY MR. SORENSON:) But that is what this court  
21   order says; is that correct?

22          A           That's correct.

23                   MR. SORENSON: All right. I think that's all I was  
24   looking for, Your Honor. I apologize. Now, if I could have  
25   just one more moment?

1 THE COURT: You may.

2 Q (BY MR. SORENSON:) All right. I just want to pick  
3 up here at the bottom. Do you see where it states right here,  
4 "Ryan v. Hyden"?

5 A Yes.

6 Q And it states -- just read that "holding that"  
7 language.

8 A (Reading:) "Holding that, even if a person was  
9 given a durable power of attorney with" --

10 Q And let me blow that up.

11 A -- "with broad language regarding claims and  
12 litigation, that power of attorney does not validly provide the  
13 right to represent that person as his or her attorney; United  
14 States v. Davis."

15 Q Okay. And what does it say after "Davis"?

16 THE COURT: So what's the purpose of her reading  
17 this document into it? She's not a lawyer. You're going to  
18 have a lawyer talk about representation.

19 MR. SORENSON: No, we're not. She's --

20 THE COURT: You have Simon Klevansky. You also have  
21 Pat Mau.

22 MR. SORENSON: Not to talk about this order, Your  
23 Honor.

24 THE COURT: So how is this something that she used  
25 in her investigation? It speaks for itself. I'm not going to

1 have her read the entire order as if it's her testimony.

2 MR. SORENSON: Okay. Well, we're just admitting the  
3 document into evidence because it's relevant and --

4 THE COURT: Yes, and --

5 MR. SORENSON: -- publishing it for the jury so  
6 that -- I mean, if we all want to sit here silently while the  
7 jury reads it, that's fine. But if I ask her relevant parts  
8 and ask her questions about those parts, which is what I've  
9 done, then I think --

10 THE COURT: I'm not going to let her read any more  
11 of it unless you give me an offer of proof as to what this had  
12 to do with her investigation, if she's going to be qualified as  
13 an expert to talk about the legal. I mean, this is  
14 Judge Mollway's order; it speaks for itself. They can read it,  
15 if they're going to be in the jury room, like any other  
16 document that's been received.

17 So --

18 MR. SORENSON: Okay.

19 THE COURT: Yeah. I mean, she's reading quotes from  
20 case law as if it's her opinion or as if it's something that  
21 she determined in her investigation.

22 MR. SORENSON: No, I think it's -- it's clear that  
23 it's coming from the order and it's -- this is the order that  
24 Mr. Williams received as a part of representing parties in  
25 this --

1 THE COURT: Right, and that's certainly that's  
2 already been part of it, but -- so anyway.

3 MR. SORENSON: Well, Your Honor, let us just move  
4 on.

5 THE COURT: Okay. Appreciate that.

6 Q (BY MR. SORENSON:) And let me ask you this: What  
7 was the date of this order?

8 A August 14th, 2013.

9 Q All right. And after this date in your  
10 investigation, did Mr. Williams continue to offer his services  
11 here in Hawaii, including the representation of homeowners?

12 A Yes, he did.

13 MR. SORENSON: Your Honor, it's probably a good time  
14 to stop.

15 THE COURT: Good. Thank you very much.

16 All right. Ladies and gentlemen of the jury, I'm going to  
17 ask that you -- before you leave today, I'm going to give you  
18 the general reminder, of course: Don't discuss the case with  
19 anyone or allow anyone to discuss it with you. Don't do any  
20 research or investigate any of the witnesses or information,  
21 companies. Of course, don't engage in any social media about  
22 the trial. And don't read, watch, or -- any media accounts,  
23 should there be any.

24 Thank you so much for your kind attention. We wish you a  
25 very good evening. We'll see you tomorrow morning. We'll

1 begin again at 8:30. If you could be in the jury lounge around  
2 8:15, it'll be greatly appreciated.

3 Please rise for the jury. They'll be leaving for the  
4 evening. Good evening to all of you.

5 (Open court out of the presence of the jury.)

6 THE COURT: And the record will reflect the jury's  
7 no longer present. You may all be seated.

8 Before we conclude for the day, are there any matters that  
9 we need to take up?

10 MR. SORENSON: Not from us, Your Honor.

11 THE COURT: Okay. You intend to finish?

12 MR. SORENSON: We should be pretty quick with her  
13 tomorrow morning, Your Honor, then cross can begin.

14 THE COURT: Great. And then your witness after?

15 MR. SORENSON: Special Agent Joe Lavelle.

16 THE COURT: Will be following. And that should take  
17 up probably the rest of the day?

18 MR. SORENSON: No, no. Mr. Lavelle will be  
19 relatively quick. And then we have Special Agent Oleski.

20 THE COURT: And that you think may take up the rest  
21 of the day?

22 MR. SORENSON: I don't think so. I think we'll be  
23 able to get through a few tomorrow.

24 Who's after that? We'll let Mr. Williams know, Your  
25 Honor.

1 THE COURT: Okay.

2 MR. SORENSON: But we think we'll get through a few  
3 tomorrow.

4 THE COURT: Okay.

5 MR. SORENSON: Just depends on how long cross  
6 probably takes.

7 THE COURT: Understood.

8 MR. SORENSON: All right. Thank you.

9 THE COURT: All right. So, Mr. Williams, so it  
10 sounds like you're going to be up for cross-examination, and  
11 you had mentioned about videos that you wanted to show during  
12 cross-examination. So you have to lay the foundation, have  
13 those received in evidence first.

14 And then there's the technological part. Have you folks  
15 met with the IT people from the court?

16 THE DEFENDANT: I'm not going to show the video on  
17 the cross on her. I'll just introduce it later on.

18 THE COURT: Okay. I just wanted to make sure we're  
19 ready for you 'cause they usually have a bigger screen or what  
20 have you, and I want to make sure it's compatible. So at some  
21 point you guys do need to touch base with our IT department and  
22 they'll assist you. Same thing if you have any questions about  
23 the videoconference witness.

24 MR. ISAACSON: May I -- Mr. Williams said I could  
25 ask you a question.

1 THE COURT: Yes.

2 MR. ISAACSON: Judge, on the exclusionary rule,  
3 obviously the agent has testified. Do you have a rule about --  
4 I know she's also the lead agent -- about her communication  
5 with the U.S. Attorneys before she resumes testimony tomorrow?

6 THE COURT: Yes. I think I already had announced  
7 that is that whoever's -- during their testimony, they can't  
8 talk to anybody about their testimony until they conclude.

9 MR. SORENSON: And Your Honor --

10 THE COURT: Yes.

11 MR. SORENSON: -- if she's still on direct, is  
12 it -- I know usually when we surrender the witness, certainly  
13 we can't.

14 THE COURT: Right.

15 MR. SORENSON: But in preparation for tomorrow, we  
16 can't discuss her testimony that she's already had.

17 THE COURT: Correct.

18 MR. SORENSON: But in terms of --

19 THE COURT: Right. Any other testimony, but you  
20 can't discuss what she's already testified about. So for new  
21 testimony that she's going to present, then you can --

22 MR. SORENSON: Yes.

23 THE COURT: -- prepare her for that, but you can't  
24 go over, say, "You know, he's going to cross-examine you in  
25 this area that you testified on." You know, you can't do that.



1           MR. SORENSON: As much as we'd love to go back over  
2 all those documents, Your Honor, probably --

3           THE COURT: I know you're sleeping with them I'm  
4 sure every night.

5           Mr. Isaacson?

6           MR. ISAACSON: Is it okay if we leave the binders  
7 where they are on my dolly? It's easier if it's okay with the  
8 Court.

9           THE COURT: Yes, yes, absolutely.

10          MR. ISAACSON: Okay.

11          THE COURT: If you -- I just wouldn't -- I suggest  
12 you not leave any electronics or anything in the courtroom. I  
13 think it would be safe, but I don't want to take the  
14 responsibility for them.

15          MR. ISAACSON: I think tomorrow we're going to have  
16 Ms. Beecher over there, easier to try to assist Mr. Williams in  
17 pulling up documents.

18          THE COURT: That's fine.

19          MR. ISAACSON: And I think the government has said  
20 if we need to pull up a government document, they'll be okay --  
21 if it's admitted.

22          MR. SORENSON: Well, yes. Your Honor, I'll take  
23 care of Mr. Williams's documents. As professional as I am at  
24 this, I think I can get them up and blow them up. I've told  
25 him just let me know what you want and what you want me to blow

1 up.

2 THE COURT: Oh, okay. The jurors had apparently  
3 conveyed that, you know, when you just see the document itself,  
4 the lettering is small. So I think it's really helpful when  
5 you enlarge it.

6 MR. SORENSON: Yeah.

7 THE COURT: And then the other thing we'll offer to  
8 them, if they want us to bring the flat screen over so they  
9 could see it. We've done that in other trials like at the  
10 corner.

11 MR. SORENSON: That might be a good idea.

12 THE COURT: So maybe we can do that, Aga, tomorrow,  
13 just have that so they have an alternative, although that  
14 doesn't help the people in the far, but seems like the older  
15 people are on the side closer to it -- not to be ageist but...

16 MR. ISAACSON: Your Honor, also, Ms. Beecher's asked  
17 if she could stay a little longer, try to make sure it works?

18 THE COURT: Yes, of course.

19 MR. ISAACSON: And Mr. Williams and I remain a  
20 little bit afterwards to try to talk about tomorrow so I can  
21 assist him better?

22 THE COURT: Yeah. So we'll clear the courtroom  
23 except for, of course, the marshals and -- so they need to know  
24 what time 'cause they're going to have to move everybody back  
25 to -- so you think 20 minutes?

1 MR. ISAACSON: Yes.

2 THE COURT: Okay. So 20 minutes so they know, you  
3 know, 'cause they have to get people back and it's the traffic  
4 and everything.

5 Okay. Very good. Then I'll see you folks tomorrow  
6 morning. Thank you very much and we're in recess for the day.  
7 Good day, everybody.

8 (Proceedings adjourned at 2:04 P.M., until  
9 Wednesday, February 5, 2020, at 8:30 A.M.)

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COURT REPORTER'S CERTIFICATE

I, DEBRA READ, Official Court Reporter, United States District Court, District of Hawaii, do hereby certify that pursuant to 28 U.S.C. §753 the foregoing is a complete, true, and correct transcript of the stenographically reported proceedings held in the above-entitled matter and that the transcript page format is in conformance with the regulations of the Judicial Conference of the United States.

DATED at Honolulu, Hawaii, April 25, 2020.

/s/ Debra Read

DEBRA READ, CSR CRR RMR RDR