

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF ORANGE - CENTRAL JUSTICE CENTER  
DEPARTMENT C23

LE XUAN KHOA,	)	
	)	
PLAINTIFF,	)	
	)	
VS.	)	NO. 30-2021-1201012
	)	
NGUYEN DINH THANG; BOAT PEOPLE S.O.S.,	)	
INC., AND DOES 1 THROUGH 100,	)	
INCLUSIVE,	)	
	)	
DEFENDANTS.	)	
-----	)	

HONORABLE DAVID J. HESSELTINE, JUDGE PRESIDING  
REPORTER'S TRANSCRIPT  
WEDNESDAY, NOVEMBER 13, 2024

MICHELLE LOTT-MEYERHOFER, CSR 8226  
COURT-APPROVED OFFICIAL REPORTER PRO TEMPORE

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W I T N E S S I N D E X  
WEDNESDAY, NOVEMBER 13, 2024

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E X H I B I T S

WEDNESDAY, NOVEMBER 13, 2024

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1 SANTA ANA, CALIFORNIA - WEDNESDAY, NOVEMBER 13, 2024

2 MORNING SESSION

3 \* \* \* \* \*

4 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT:)

5 THE COURT: WELL, THEN, WHY DON'T WE GO AHEAD AND GO  
6 ON THE RECORD IN KHOA V. THANG. AND WE'LL START WITH THE  
7 APPEARANCES FOR THE DAY.

8 MR. HART: GOOD MORNING, YOUR HONOR. HOYT HART FOR  
9 THE PLAINTIFF, LE XUAN KHOA.

10 THE COURT: THANK YOU.

11 MR. VOSS: GOOD MORNING, YOUR HONOR. DAVID VOSS,  
12 VOSS, SILVERMAN & BRAYBROOKE, FOR THE DEFENDANTS.

13 MR. ERIGERO: GOOD MORNING, YOUR HONOR. STEPHEN  
14 ERIGERO, ROPERS MAJESKI, ALSO FOR THE DEFENDANTS.

15 THE COURT: ALL RIGHT. THANK YOU VERY MUCH.

16 ALL RIGHT. THEN I THINK WE'RE -- JUST  
17 DOUBLE-CHECKING, WE'RE MISSING ONE JUROR?

18 COURT ATTENDANT: WE GOT 'EM ALL, YOUR HONOR.

19 THE COURT: ALL RIGHT. MR. VOSS, YOU'RE ALL SET AND  
20 READY TO GO WITH RESUMING YOUR CROSS?

21 MR. VOSS: YES, YOUR HONOR. I JUST NEED TO PULL THE  
22 EXHIBIT.

23 THE COURT: ALL RIGHT. THEN WE'RE GOING TO GO AHEAD  
24 AND BRING THE JURY ON IN.

25 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT IN THE  
26 PRESENCE OF THE JURY:)

1 THE COURT: ALL RIGHT. THEN GOOD MORNING, LADIES AND  
2 GENTLEMEN. WE HAVE BEEN REJOINED BY ALL OF OUR JURORS. THANK  
3 YOU VERY MUCH. AND WE'LL GIVE YOU A SECOND TO GET SETTLED IN,  
4 AND THEN WE'RE GOING TO DIVE RIGHT BACK IN WITH THE DEFENSE  
5 QUESTIONING OF THE PLAINTIFF.

6 MR. VOSS: YES. GOOD MORNING, YOUR HONOR.

7 PICKING UP WHERE WE LEFT OFF, WE, I BELIEVE,  
8 HAD 234 UP ON THE SCREEN.

9 THE COURT: CORRECT. EXHIBIT 234 WAS -- IT MAY BE  
10 PUBLISHED.

11 (DOCUMENT PUBLISHED.)

12 MR. VOSS: ALL RIGHT. THANK YOU, YOUR HONOR.

13 CROSS-EXAMINATION RESUMED

14 BY MR. VOSS:

15 Q I BELIEVE WE LEFT OFF WITH ASKING THE WITNESS,  
16 WITH RESPECT TO THE STATEMENT, THE FIRST SENTENCE IN  
17 PARAGRAPH 5, WHICH SAYS, "MR. KHOA'S SELF-PROMOTION AS A  
18 PH.D.," IS IT CORRECT TO SAY THAT THAT'S A STATEMENT BY  
19 CONGRESSMAN DORNAN?

20 MR. HART: OBJECTION. ASKED AND ANSWERED.  
21 MISCHARACTERIZES THE TESTIMONY.

22 THE COURT: ALL RIGHT. AND SO I'LL OVERRULE. WE  
23 COVERED A LOT OF THAT ON THE RECORD YESTERDAY.

24 SO YOU MAY RESPOND AGAIN TO THAT SPECIFIC  
25 QUESTION.

26 THE WITNESS: SO THE QUESTION IS?

1 THE COURT: THE QUESTION IS THAT ON THE APRIL 30TH,  
2 1996, LETTER FROM CONGRESSMAN DORNAN'S OFFICE, THE PARAGRAPH  
3 AT THE BOTTOM OF PAGE 5 THAT STARTS WITH THE NUMBER -- BOTTOM  
4 OF PAGE 1 THAT STARTS WITH THE NUMBER 5, THAT FIRST SENTENCE  
5 RELATING TO THE PH.D. COMMENT, THAT WAS A STATEMENT BY  
6 CONGRESSMAN DORNAN AS THE AUTHOR OF THE LETTER; IS THAT  
7 CORRECT?

8 THE WITNESS: I DON'T KNOW -- I DON'T THINK THAT  
9 DORNAN WHO AUTHORED THAT LETTER. AND HE DIDN'T SPEAK ANYTHING  
10 ABOUT PH.D. OR WHAT, NOTHING. I DON'T THINK THAT HE -- YEAH,  
11 THE PARAGRAPH ABOUT -- YEAH, THAT'S THE PEOPLE WHO REFER TO  
12 HIM AS I HAVE A PH.D., A SELF-PROMOTION AS PH.D. SO THIS IS  
13 NOT FROM HIM BUT FROM OTHER PEOPLE. OKAY.

14 BY MR. VOSS:

15 Q ALL RIGHT, THEN. IF I COULD ASK YOU TO SCROLL  
16 TO THE TOP OF THE PAGE, FIRST.

17 AND DO YOU UNDERSTAND THAT THIS LETTER IS ON  
18 THE OFFICIAL LETTERHEAD OF CONGRESSMAN ROBERT K. DORNAN ON  
19 APRIL 30, 1996?

20 A YES, THAT'S OFFICIAL.

21 Q SCROLL TO THE BOTTOM OF PAGE 2.

22 AND ON THE LAST PAGE, YOU SEE THE SIGNATURE OF  
23 ROBERT DORNAN ON THE LETTER?

24 A YES, I SAW THE SIGNATURE OF MR. DORNAN.

25 Q SO WE HAVE A STATEMENT, "MR. KHOA'S  
26 SELF-PROMOTION AS PH.D.," ON OFFICIAL CONGRESSIONAL LETTERHEAD

1 SIGNED BY THE CONGRESSMAN.

2 DO YOU HAVE ANY INFORMATION YOU CAN GIVE US TO  
3 SHOW THAT THIS STATEMENT WAS MADE BY DR. THANG?

4 A YOU JUST SAID THAT OTHER PEOPLE FROM THERE.  
5 THAT MEANS -- YEAH.

6 Q OKAY. IS -- HAVE -- CAN YOU -- OR STRIKE THAT.  
7 ISN'T IT TRUE THAT IN NO WRITING DID DR. THANG  
8 EVER SAY THAT YOU HAD A PH.D.?

9 A I HAVE NO ANSWER. I CAN'T SAY THAT.

10 Q IT'S CORRECT BECAUSE HE NEVER DID SAY THAT YOU  
11 HAD A PH.D. EVER; RIGHT?

12 A I DON'T KNOW.

13 Q SO THE PERSON WHO DID IS THE CONGRESSMAN, NOT  
14 THE DEFENDANT; RIGHT?

15 MR. HART: OBJECTION. MISCHARACTERIZES TESTIMONY --  
16 OR THE EXHIBIT, RATHER. SORRY.

17 THE COURT: WAIT. MR. KHOA, HOLD ON.

18 SUSTAINED, IF YOU WANT TO REPHRASE.

19 BY MR. VOSS:

20 Q OKAY. THE LETTER FROM THE CONGRESSMAN  
21 REFERENCES YOU HAVING SELF-PROMOTED AS A PH.D.; RIGHT?

22 A THE LETTER SAY THAT, BUT --

23 Q OKAY. SO LET'S MOVE TO THE NEXT SENTENCE OF --

24 A -- OTHER PEOPLE.

25 THE REPORTER: I'M SORRY. YOU'RE TALKING OVER EACH  
26 OTHER.



1 MR. VOSS: I THOUGHT HE WAS DONE WHEN HE SAID "YES."

2 THE COURT: AGAIN, MR. HART WILL HAVE THE OPPORTUNITY  
3 TO DO ANY FOLLOW-UP WITH YOU, PROFESSOR.

4 BY MR. VOSS:

5 Q SO LET'S GO BACK TO THE PARAGRAPH 5 AGAIN, ON  
6 THE BOTTOM OF PAGE 1, PLEASE.

7 SO MOVING TO THE NEXT SENTENCE THERE IT SAYS:  
8 "HOWEVER, HE RECENTLY ADMITTED THAT HE DOES NOT HAVE SUCH A  
9 DEGREE."

10 DO YOU SEE THAT?

11 A NO, I HAVE NOT ADMITTED AT ALL, SO I DON'T KNOW  
12 WHY --

13 Q SO YOU DISAGREE WITH THE CONGRESSMAN; CORRECT?

14 A I DISAGREE WITH --

15 Q BUT THIS IS WHAT THE CONGRESSMAN STATED ON HIS  
16 LETTERHEAD AND SIGNED IT; THAT YOU ADMITTED THAT YOU DIDN'T  
17 HAVE SUCH A DEGREE; RIGHT?

18 A I DID NOT ADMIT IT.

19 Q MR. KHOA, THE STATEMENT THAT IS THE ONLY BASIS  
20 FOR US TO LOOK AT FOR WHETHER OR NOT MY CLIENT IS RESPONSIBLE  
21 FOR DEFAMING YOU SAYS: "MR. KHOA FALSELY CLAIMED HE HELD A  
22 DOCTORAL DEGREE IN THE APPLICATION FOR A GRANT FROM THE  
23 DEPARTMENT OF STATE."

24 ISN'T IT TRUE TO SAY THAT THE CONGRESSMAN IS  
25 THE ONE THAT MADE THAT STATEMENT BY MEANS OF THIS LETTER?

26 MR. HART: OBJECTION. MISCHARACTERIZES THE EXHIBIT.

1 THE COURT: OVERRULED. THAT WILL BE FOR THE JURY TO  
2 READ AND DECIDE EVERYTHING.

3 YOU MAY RESPOND, SIR.

4 THE WITNESS: OKAY. I SAY THAT I DID NOT ADMIT THAT  
5 I DON'T HAVE IT, BECAUSE I DON'T HAVE IT. OKAY? I'M -- I  
6 DON'T HAVE ANYTHING LIKE PH.D. OKAY. BUT I DON'T ADMIT TO  
7 ANYBODY --

8 MR. VOSS: OBJECTION. MOVE TO STRIKE AS  
9 NONRESPONSIVE.

10 THE COURT: JUST HOLD ON, MR. KHOA.

11 THAT WOULD BE -- WAIT, MR. KHOA, IF YOU WOULD,  
12 PLEASE.

13 THAT WILL BE GRANTED. THAT LAST RESPONSE WILL  
14 BE STRICKEN.

15 AGAIN, THE QUESTION IS FOCUSED MORE ON THIS  
16 LETTER AND WHO MADE THE STATEMENTS OR WROTE THE STATEMENTS IN  
17 THE LETTER, NOT NECESSARILY WHETHER THEY ARE TRUE STATEMENTS.  
18 THE FOCUS OF THIS QUESTION IS, AGAIN, WHO IS MAKING THE  
19 STATEMENTS IN THIS LETTER.

20 SO WITH THAT FOCUS, MR. VOSS IS GOING TO ASK  
21 YOU THE QUESTION ONE MORE TIME.

22 BY MR. VOSS:

23 Q SO AND, AGAIN, THE STATEMENT, AND ONLY THAT  
24 STATEMENT THAT CAN BE THE BASIS FOR A FINDING OF DEFAMATION IN  
25 THIS CASE --

26 MR. HART: I'M GOING TO OBJECT TO THAT, YOUR HONOR.

1 THAT'S -- HE'S MIXED IN THE --

2 THE COURT: WELL, THIS -- WAIT. WAIT. WAIT. RIGHT  
3 THERE. LET'S TRY AGAIN IN OUR WORDING.

4 BY MR. VOSS:

5 Q THAT STATEMENT DRAWN ON THE BOARD BY YOUR  
6 ATTORNEY THAT SAYS THAT "MR. KHOA FALSELY CLAIMED HE HELD A  
7 DOCTORAL DEGREE" IS SUPPORTED BY THIS STATEMENT OF THE  
8 CONGRESSMAN'S LETTER ON APRIL 30, 1996; ISN'T IT?

9 A THE FACT IS THAT THERE WAS NO INVESTIGATION. I  
10 WAS NOT INVESTIGATED. SO ...

11 Q SO, NOW, IS IT CORRECT TO SAY THAT YOU DON'T  
12 LIKE OR DISAGREE WITH WHAT CONGRESSMAN SMITH HAD TO SAY, AND  
13 NOW WE HAVE A SECOND CONGRESSMAN THAT YOU ALSO DISAGREE WITH?

14 A YEAH, BECAUSE THE CONGRESSMAN KEEP SAYING THAT  
15 HE GET THE INFORMATION FROM OTHER PEOPLE.

16 Q OKAY. LET'S GO TO THE LAST SENTENCE.

17 A AND I WAS NOT INVESTIGATED.

18 Q OKAY. YOU WEREN'T INVESTIGATED.

19 LET'S GO TO THE LAST SENTENCE OF PARAGRAPH 5:  
20 "HIS MISREPRESENTATION OF ACADEMIC CREDENTIALS MAY HAVE  
21 RESULTED IN HIS RECEIVING STATE DEPARTMENT GRANTS OVER  
22 COMPETING APPLICANTS."

23 NOW, I WANT TO BREAK THAT DOWN INTO ITS TWO  
24 PARTS. THE FIRST PART, "HIS MISREPRESENTATION OF ACADEMIC  
25 CREDENTIALS," THERE'S NO STATEMENT THERE THAT SAYS THAT'S  
26 SOMETHING THAT STILL NEEDS TO BE INVESTIGATED, IS THERE?

1           A           THIS IS JUST SPECULATION.

2           Q           SO THE CONGRESSMAN, YOU BELIEVE, IS  
3 SPECULATING; IS THAT RIGHT?

4           A           YES, THAT'S SPECULATION.

5           Q           ALL RIGHT. SO THE INVESTIGATION HE IS CALLING  
6 FOR IN THIS LETTER, WHERE HE SAYS ON THE NEXT PAGE, "I HEREBY  
7 REQUEST YOUR INSPECTOR GENERAL'S OFFICE INVESTIGATE THESE  
8 ME" -- EXCUSE ME. TRY IT AGAIN.

9                        "I HEREBY REQUEST THAT YOUR INSPECTOR GENERAL'S  
10 OFFICE INVESTIGATE THESE MATTERS AND PROVIDE ME WITH THE  
11 FOLLOWING INFORMATION BY MAY 30, 1996."

12                      THE PART HE NEEDS INVESTIGATED BY THE INSPECTOR  
13 GENERAL IS THE SECOND HALF OF THAT SENTENCE, RIGHT; THAT IT  
14 MAY HAVE RESULTED IN RECEIVING STATE DEPARTMENT GRANTS?

15           A           YEAH, HE WANT TO SEE THE RESULT OF THE  
16 INVESTIGATION.

17           Q           OKAY. SO LET'S GO DOWN TO PAGE 2. ALL RIGHT.  
18 THERE WE GO.

19                      SO THE LETTER LISTS THESE FIVE THINGS, ONLY ONE  
20 OF WHICH, NUMBER 5, HAVE WE FOCUSED ON, AND THEN SAYS WHAT I  
21 JUST SAID: REQUEST YOUR INSPECTOR GENERAL'S OFFICE  
22 INVESTIGATE THESE MATTERS AND PROVIDE YOU WITH THE FOLLOWING  
23 INFORMATION.

24                      THE INFORMATION REQUESTED HAS TO DO WITH  
25 FUNDING, NOT WHETHER OR NOT YOU CLAIM TO BE A PH.D.; CORRECT?

26           A           YES. I WANT -- I WOULD LIKE TO KNOW THE RESULT

1 OF THIS INVESTIGATION.

2 Q OKAY. BUT THIS ONLY HAS TO DO WITH THE SECOND  
3 HALF OF THE SENTENCE; THAT THE MISREPRESENTATION OF ACADEMIC  
4 CREDENTIALS MAY HAVE RESULTED IN RECEIVING STATE DEPARTMENT  
5 GRANTS.

6 SO WE LOOK HERE, FIRST, THE THINGS THAT HE  
7 SEEKS ARE: "ANY RECORDS AND DOCUMENTS RELATING TO STATE  
8 DEPARTMENT FUNDING PROJECTS FOR S.E.A.R.A.C. OR MR. KHOA."

9 RIGHT? THAT'S THE FIRST?

10 A THE SECOND PART OF THE SENTENCE WAS  
11 SPECULATION.

12 Q DO YOU HAVE ANYTHING THAT YOU CAN POINT TO TO  
13 SHOW US THAT IT WAS SPECULATION OR DO YOU JUST GUESS THAT IT  
14 WAS?

15 A AND THE -- AND I'M TRYING TO SEE WHETHER THE  
16 RESULT OF -- IF THERE IS ANY INVESTIGATION, THAT THIS  
17 INFLUENCED MY REQUEST FOR -- FOR --

18 MR. VOSS: OBJECTION. MOVE TO STRIKE.  
19 NONRESPONSIVE.

20 THE COURT: SUSTAINED. THE LAST RESPONSE WILL BE  
21 STRICKEN, DISREGARDED BY THE JURY.  
22 BY MR. VOSS:

23 Q THE SECOND AREA OF INQUIRY SOUGHT BY THE  
24 CONGRESSMAN IS: "ALL RECORDS RELATED TO THE COMPETITIVE  
25 BIDDING PROCESS REGARDING FUNDING OBTAINED BY S.E.A.R.A.C. OR  
26 MR. KHOA."

1                   RIGHT?  ISN'T THAT CORRECT?

2                   A        SO I DON'T KNOW IF THE STATE DEPARTMENT PROVIDE  
3 ANY INFORMATION RELATED TO --

4                   Q        YOU DON'T KNOW; RIGHT?

5                   A        SO I CAN'T ANSWER THIS.  THIS IS BETWEEN THE  
6 STATE DEPARTMENT AND MR. DORNAN.

7                   Q        LET ME JUST READ THE REST OF IT THEN.

8                                THIRD:  DIPLOMAS AND OTHER CERTIFICATION  
9 REGARDING MR. LE XUAN KHOA'S ACADEMIC CREDENTIALS?

10                               FOURTH:  ALL DOCUMENTATION REGARDING FEDERAL  
11 LAWS RELATED TO LOBBYING EFFORTS BY 501(C)(3) AGENCIES.

12                               AND FIFTH:  ALL DOCUMENTATION REGARDING  
13 S.E.A.R.A.C. AND MR. LE XUAN KHOA'S RELATIONSHIP LOBBYING OR  
14 ADVOCATING FOR THE INTEREST OF A FOREIGN GOVERNMENT.

15                               RIGHT?  SO THIS WAS ALL THE THINGS HE WAS NOW  
16 ASKING THE INSPECTOR GENERAL TO DO; RIGHT?

17                   A        YES, HE WOULD LIKE THE INSPECTOR GENERAL TO DO  
18 THIS, BUT I DON'T KNOW WHETHER THE INSPECTOR DID IT OR NOT,  
19 BECAUSE, IN FACT, I WAS NOT INVESTIGATED.  THAT'S A FACT.

20                   Q        OKAY.  BUT IT'S A FACT THAT WHEN WE TALK ABOUT  
21 YOU BEING INVESTIGATED, THERE ARE ACTUALLY TWO INVESTIGATIONS,  
22 NOT JUST WHETHER THE INSPECTOR GENERAL DID; RIGHT?

23                   MR. HART:  I'M GOING TO OBJECT.  THAT QUESTION  
24 ASSUMES FACTS NOT IN EVIDENCE THAT THERE WAS AN INVESTIGATION.

25                   THE COURT:  AND IT'S VAGUE.  LET'S BE CLEAR ABOUT  
26 WHAT WE'RE TALKING ABOUT.

1 BY MR. VOSS:

2 Q OKAY. BEFORE CONGRESSMAN DORNAN MADE THESE  
3 REQUESTS, HE DID HIS OWN EXAMINATION OF THE INFORMATION BEFORE  
4 WRITING THE APRIL 30TH LETTER; ISN'T THAT CORRECT?

5 MR. HART: OBJECTION. CALLS FOR SPECULATION.

6 THE COURT: OVERRULED. HE MAY NOT KNOW, BUT WE'LL  
7 HAVE TO SEE.

8 SO YOU MAY RESPOND TO THAT QUESTION, MR. KHOA.

9 THE WITNESS: I DON'T KNOW ANYTHING ABOUT OTHER  
10 PEOPLE OR CONGRESSMAN HIMSELF DID INVESTIGATED ME. I HAVE  
11 NEVER BEEN ASKED BY ANYBODY.

12 BY MR. VOSS:

13 Q LET'S GO TO EXHIBIT 233, PLEASE.

14 MR. VOSS: DID WE RECEIVE 233?

15 THE COURT: LET ME DOUBLE-CHECK.

16 MR. VOSS: I'M NOT SURE WE DID.

17 IT WAS RECEIVED. OKAY. THANK YOU.

18 THE COURT: IT WAS ADMITTED.

19 MR. VOSS: REQUEST TO PUBLISH 233.

20 THE COURT: GIVEN 233 WAS PREVIOUSLY ADMITTED, IT MAY  
21 BE PUBLISHED.

22 (DOCUMENT PUBLISHED.)

23 BY MR. VOSS:

24 Q SO, MR. KHOA, YOU'VE SEEN THIS LETTER BEFORE;  
25 RIGHT? THERE WERE THE TWO LETTERS FROM CONGRESSMAN DORNAN.  
26 YOU'VE SEEN THIS --

1           A        I HAVE SEEN THIS.

2           Q        YEAH.

3                        SO IN THE SECOND SENTENCE OF THE LETTER, ISN'T  
4 IT CORRECT THAT CONGRESSMAN DORNAN IDENTIFIES THAT, "SINCE  
5 THAT TIME" -- WHICH WAS FOLLOWING UP ON A MARCH 6TH LETTER  
6 PREVIOUSLY -- WELL, STRIKE THAT. I'LL JUST GO FROM THE  
7 BEGINNING, BECAUSE I WAS DISJOINTED THERE. APOLOGIZE.

8                        THE FIRST PARAGRAPH OF THE APRIL 2 LETTER SAYS:  
9 "THIS IS TO FOLLOW UP ON MY LETTER TO YOUR OFFICE ON MARCH 6,  
10 1996. SINCE THAT TIME, MY STAFF HAS CONTINUED OUR  
11 INVESTIGATION INTO THE S.E.A.R.A.C. ORGANIZATION, INCLUDING  
12 THE AFFILIATED ORGANIZATIONS AND PROCEEDS FROM THERE."

13                      THE NEXT SENTENCE SAYS: "I HAVE UNCOVERED  
14 TROUBLING INFORMATION REGARDING THESE ORGANIZATIONS."

15                      THE ORGANIZATIONS HE'S REFERRING TO ARE THE  
16 ONES OF WHICH YOU WERE THE PRESIDENT AT THE TIME; ISN'T THAT  
17 CORRECT?

18           A        I DON'T UNDERSTAND THIS QUESTION.

19           Q        ISN'T IT CORRECT THAT S.E.A.R.A.C., HMONG  
20 NATIONAL DEVELOPMENT AND INDOCHINA COMMUNITY CENTER AND THEIR  
21 LEADERS ARE ORGANIZATIONS, I'LL JUST SAY, WITH WHICH YOU WERE  
22 AFFILIATED?

23           A        YES. I KNOW THAT S.E.A.R.A.C. IS A NATIONAL  
24 ORGANIZATION, AND IT HAS AFFILIATES.

25           Q        OKAY. AND DO YOU UNDERSTAND THAT THE  
26 CONGRESSMAN IS SAYING ON HIS LETTERHEAD THAT, MY STAFF HAS



1 CONTINUED OUR INVESTIGATION, AND THAT THAT INVESTIGATION IS  
2 SEPARATE AND DISTINCT FROM HIS REQUEST IN THE LETTER,  
3 EXHIBIT 234, THAT THE INSPECTOR GENERAL PROVIDE INFORMATION TO  
4 IT? DO YOU UNDERSTAND THAT? TWO INVESTIGATIONS?

5 A I'M NOT AWARE OF THE INVESTIGATION CONDUCTED BY  
6 MR. DORNAN.

7 Q AND, YET, THERE IT IS ON EXHIBIT 233, THE  
8 CONGRESSMAN'S LETTER OF APRIL 2, 1996; RIGHT?

9 MR. HART: OBJECTION. ARGUMENTATIVE.

10 THE COURT: OVERRULED.

11 YOU MAY RESPOND, SIR.

12 THE WITNESS: OKAY. THIS IS THE LETTER FROM  
13 MR. DORNAN TO MRS. LIMON. YES, I SEE THIS LETTER.

14 BY MR. VOSS:

15 Q OKAY. AND SO DID YOU UNDERSTAND -- YOU'VE SEEN  
16 THIS LETTER BEFORE -- THAT THERE WASN'T JUST ONE  
17 INVESTIGATION, THERE WERE TWO. THE CONGRESSMAN DID HIS OWN  
18 INVESTIGATION SEPARATELY; CORRECT?

19 A I JUST SAID THAT I SEE THE LETTER, YEAH. I SEE  
20 THAT IN FRONT OF ME.

21 Q SO IF WE COULD SHOW PARAGRAPHS 1 AND 2 AT THE  
22 SAME TIME, PLEASE.

23 SO IN PARAGRAPH 1, THE CONGRESSMAN SAYS HIS  
24 STAFF HAS INVESTIGATED AND THEY HAVE UNCOVERED TROUBLING  
25 INFORMATION.

26 THE NEXT PARAGRAPH HE SAYS: "ENCLOSED IS AN

1 ARTICLE FROM THE MARCH 1996 COMMUNITY NEWS MAGAZINE PUBLISHED  
2 IN MY DISTRICT IN ORANGE COUNTY, CALIFORNIA. THE ARTICLE,  
3 ENTITLED 'S.E.A.R.A.C. AND N.A.V.A.S.A. FOUND TO HAVE  
4 MISAPPROPRIATED VIETNAMESE COMMUNITY OF ORANGE COUNTY NAME IN  
5 EFFORT TO SECURE GOVERNMENT FUNDS.'"

6 SO THE CONGRESSMAN IS SAYING, AS A RESULT OF  
7 HIS OWN INVESTIGATION, THAT HE FOUND TROUBLING INFORMATION  
8 REGARDING S.E.A.R.A.C.; RIGHT?

9 A OKAY. I WAS AWARE OF THE LETTER, BUT I  
10 ALSO -- THIS IS NOTHING ABOUT S.E.A.R.A.C. AND THEM, BECAUSE  
11 THIS IS -- THE LETTER WAS ASKING ABOUT N.A.V.A.S.A. AND --

12 Q THE CONGRESSMAN SAYS THAT THE ARTICLE IS  
13 ENTITLED --

14 MR. HART: OBJECTION. THE WITNESS SHOULD BE ALLOWED  
15 TO FINISH HIS STATEMENT.

16 THE WITNESS: SO I UNDERSTAND THAT I ALREADY WRITE TO  
17 THAT ORGANIZATION -- I FORGOT THE NAME -- BUT SAYING THAT I  
18 HAVE NOTHING TO DO WITH THIS. AND THE PERSON FROM  
19 N.A.V.A.S.A. ALSO WROTE TO HIM. AND I UNDERSTAND THAT NOTHING  
20 HAPPENED AFTER THAT. THAT MEANS THE OTHER SIDE KEEP SILENT.  
21 I ALWAYS REMEMBER THAT.

22 WHEN I ANSWERED THAT LETTER, I SAID THAT I -- I  
23 HAD COOPERATED -- THIS ORGANIZATION HAD COOPERATED WITH -- AS  
24 AN AFFILIATED WITH S.E.A.R.A.C. TO ORGANIZE THE --

25 MR. VOSS: OBJECTION. MOVE TO STRIKE AS  
26 NONRESPONSIVE, THE LAST PART.

1 THE WITNESS: -- THE ORGANIZATION OF N.A.V.A.S.A.

2 THE COURT: OKAY. ONE MOMENT, SIR.

3 I THINK THE -- I AM GOING TO GRANT THAT MOTION  
4 TO STRIKE. INSTRUCT THE JURY TO DISREGARD THAT RESPONSE.

5 THE QUESTION WAS NOT SO MUCH, AGAIN, ABOUT THE  
6 TRUTH OF THE STATEMENTS, BUT WHETHER THAT IS JUST WHAT IS  
7 BEING STATED IN THE LETTER.

8 SO THAT'S THE FOCUS. HE'LL ASK HIS QUESTION  
9 AGAIN.  
10 BY MR. VOSS:

11 Q IS IT CORRECT TO STATE THAT, IN THIS LETTER  
12 FROM THE CONGRESSMAN'S OFFICE, WHERE THEY EXPRESSLY REFERENCE  
13 AN ARTICLE THAT IDENTIFIES S.E.A.R.A.C., THAT IT WAS  
14 MISAPPROPRIATING VIETNAMESE COMMUNITY IN AN EFFORT TO SECURE  
15 GOVERNMENT FUNDS? IT SAYS IT RIGHT THERE, DOESN'T IT?

16 A OKAY. NOW I REMEMBER. I WROTE A LETTER  
17 TO -- THIS IS THE LAWYER'S OFFICE. I DON'T KNOW -- I CAN'T  
18 REMEMBER HIS NAME, BUT THIS IS FROM A LAWYER'S OFFICE, AND I  
19 ANSWERED HIM.

20 THE COURT: PROFESSOR KHOA. PROFESSOR KHOA, AGAIN,  
21 THE QUESTION IS JUST SIMPLY WHAT THIS LETTER STATES, NOT THE  
22 TRUTH OF ANY STATEMENTS, JUST SIMPLY THAT THIS LETTER CONTAINS  
23 OR MAKES THE STATEMENT. SO THAT'S AN IMPORTANT DISTINCTION WE  
24 NEED TO HAVE YOU UNDERSTAND TO ANSWER THE QUESTION.

25 SO THE QUESTION, AGAIN, IS: DOES THAT SECOND  
26 PARAGRAPH OF THE LETTER INCLUDE THAT STATEMENT? EVEN IF YOU

1 DISAGREE WITH IT OR YOU THINK IT'S UNTRUTHFUL, DOES THE LETTER  
2 INCLUDE THE STATEMENT?

3 THE WITNESS: I RECEIVED THE LETTER, AND I DISAGREED  
4 WITH THE LETTER. AND I ANSWERED THEM. AND AFTER THAT,  
5 NOTHING HAPPENED, BECAUSE I --  
6 BY MR. VOSS:

7 Q ALL RIGHT. SO WHEN YOU SAY YOU ANSWERED "HIM,"  
8 JUST SO I'M CLEAR ON THE PRONOUN "HIM," WHO DID YOU SEND A  
9 LETTER TO, DR. THANG OR THE CONGRESSMAN?

10 A I SENT THE LETTER TO THE LAW FIRM.

11 Q WHAT LAW FIRM?

12 A AND TELLING HIM THAT I DID PROVIDE SOME FUNDING  
13 TO -- TO THAT COMMUNITY ORGANIZATION TO HELP PREPARE THE --

14 Q WHAT LAW FIRM?

15 A -- THE NATIONAL ASSOCIATION OF COMMUNITY  
16 ORGANIZATION.

17 Q AGAIN, PLEASE LISTEN TO MY QUESTION.

18 MR. HART: YOUR HONOR, I HAVE TO OBJECT. HE'S  
19 CONSTANTLY INTERRUPTING THE WITNESS' STATEMENTS BEFORE HE'S  
20 FINISHED. IF THERE'S NOT AN OBJECTION OR MOTION TO STRIKE, I  
21 ASK THE COURT TO ADMONISH MR. VOSS TO STOP INTERRUPTING THE  
22 WITNESS' STATEMENT.

23 THE COURT: ALL RIGHT. THERE'S PLENTY OF ADMONITIONS  
24 TO GO AROUND. SO WE'RE GOING TO GO AHEAD AND LISTEN TO THE  
25 QUESTION, PLEASE.

26 YOU MAY PLEASE STATE THE QUESTION, MR. VOSS.

1 BY MR. VOSS:

2 Q TO WHAT LAW FIRM ARE YOU SAYING YOU WROTE ABOUT  
3 THIS LETTER?

4 A I DON'T REMEMBER THE NAME OF THE LAW FIRM, BUT  
5 I THOUGHT I CAN FIND IT IN -- IN -- AT HOME, BUT IT WOULD TAKE  
6 TIME. THAT'S THE ONLY THING.

7 Q WHO WAS THIS LAW FIRM REPRESENTING?

8 A THE FACT THAT AFTER THAT, AFTER ANSWER THE  
9 LETTER, NOTHING HAPPENED.

10 MR. VOSS: YOUR HONOR, OBJECTION. MOVE TO STRIKE AS  
11 NONRESPONSIVE.

12 THE COURT: MR. KHOA, THIS QUESTION IS SIMPLE AND  
13 JUST WANTS TO KNOW WHO OR WHAT LAW FIRM YOU WROTE TO. IF YOU  
14 DON'T RECALL, THAT'S AN ACCEPTABLE ANSWER. BUT THAT'S THE  
15 QUESTION, NOT OTHER BACKGROUND AND OTHER INFORMATION RELATING  
16 TO ANYTHING THAT CAME OUT OF THAT LETTER.

17 THE QUESTION IS SIMPLY: WHICH LAW FIRM DID YOU  
18 WRITE TO?

19 THE WITNESS: I COULDN'T REMEMBER THE NAME OF THE LAW  
20 FIRM.

21 THE COURT: THAT'S ACCEPTABLE.

22 NEXT QUESTION.

23 BY MR. VOSS:

24 Q THE NEXT QUESTION, THEN, IS: DO YOU RECOLLECT  
25 WHO THE LAW FIRM REPRESENTED?

26 A THE DATE I COULDN'T REMEMBER.

1 Q SO YOU WROTE, WHEN YOU READ THIS, A LETTER TO A  
2 LAW FIRM THAT REPRESENTED SOMEBODY YOU DON'T PRESENTLY  
3 RECOLLECT; IS THAT CORRECT?

4 A RECENTLY, I COULDN'T REMEMBER.

5 Q OKAY. BUT IS IT ALSO FAIR TO SAY THAT IN  
6 RESPONSE TO THIS LETTER, YOU DID NOT WRITE ANYTHING TO THE  
7 DEFENDANTS IN THIS CASE?

8 A NOT TO THE DEFENDANT.

9 Q OKAY. SO NOW LET'S TURN TO THE NEXT SENTENCE  
10 OF THE PARAGRAPH, "IN ADDITION, WE HAVE LEARNED."

11 NOW, THAT "WE" IS REFERRING, IS IT NOT, TO THE  
12 CONGRESSMAN'S STAFF INVESTIGATION IN THE PARAGRAPH BEFORE?

13 A ABOUT THE STAFF -- CONGRESSMAN STAFF  
14 INVESTIGATION, I DON'T KNOW ANYTHING ABOUT THIS.

15 Q OKAY. SO THE SENTENCE FULLY SAYS: "IN  
16 ADDITION, WE HAVE LEARNED THAT I.R.A.C./S.E.A.R.A.C. HAS  
17 MISREPRESENTED LE XUAN KHOA AS A 'DOCTOR.'"

18 YOU SEE THAT THERE?

19 A YOU REFER TO THE SECOND PARAGRAPH?

20 Q THAT'S CORRECT.

21 SO ISN'T IT CORRECT TO SAY THAT THE  
22 CONGRESSMAN'S OWN INVESTIGATION THROUGH HIS STAFF DETERMINED  
23 THAT YOU HAD MISREPRESENTED YOURSELF AS A DOCTOR?

24 MR. HART: OBJECTION. MISCHARACTERIZES THE EXHIBIT.  
25 IT DOES NOT SAY "KHOA," IT SAYS "S.E.A.R.A.C."

26 THE COURT: WAIT. WAIT. WE'RE NOT GOING TO DO IT.

1 NO.

2 THE WITNESS: THIS IS WHAT THEY SAID.

3 THE COURT: WAIT. WAIT. EVERYBODY, WAIT.

4 MR. VOSS, WHY DON'T WE RESTATE OUR QUESTION.

5 BY MR. VOSS:

6 Q THE SENTENCE SAYS: "WE HAVE LEARNED THAT  
7 I.R.A.C./S.E.A.R.A.C. HAS MISREPRESENTED LE XUAN KHOA AS A  
8 'DOCTOR.'"

9 THAT WAS A FINDING BY THE CONGRESSMAN'S OFFICE;  
10 RIGHT?

11 MR. HART: OBJECTION. CALLS FOR SPECULATION.

12 THE COURT: OVERRULED.

13 YOU MAY RESPOND.

14 THE WITNESS: I CONFIRM, AGAIN, THAT I HAVE NEVER  
15 BEEN INVESTIGATED. I HAVE NEVER BEEN ASKED ABOUT ANYTHING  
16 THAT THE STAFF REFER TO. I WAS NOT AWARE OF THAT.

17 BY MR. VOSS:

18 Q WHETHER YOU'RE AWARE OF IT OR NOT --

19 A I DON'T KNOW WHY THEY SAY -- THIS INFORMATION  
20 CAME FROM.

21 Q OKAY. SO THEN THE NEXT SENTENCE SAYS:  
22 "RECENTLY, IN THE FACE OF PUBLIC INQUIRY, MR. KHOA ADMITTED HE  
23 IS NOT A DOCTOR."

24 SEE THAT THERE?

25 A THE SAME THING; I WAS NOT ASKED -- I WAS NOT  
26 INVESTIGATED. SO WHY THERE WAS SUCH THING THAT I ADMITTED? I

1 NEVER ADMITTED.

2 Q BUT IT'S CORRECT TO SAY THAT YOU READ THIS  
3 LETTER AT THE TIME; RIGHT?

4 MR. HART: OBJECTION. VAGUE AS TO TIME.

5 THE COURT: THE TIME OF THE LETTER.

6 MR. VOSS: APRIL 2, 1996.

7 THE WITNESS: AT LEAST THAT'S AT THE TIME -- I  
8 MEAN -- WHAT THE TIME --

9 MR. HART: OKAY. THEN, FOUNDATION.

10 MR. VOSS: IT'S ADMITTED INTO EVIDENCE. SORRY.

11 THE COURT: OVERRULED.

12 IF HE DOESN'T KNOW, HE DOESN'T KNOW WHEN HE  
13 READ IT, BUT WE'LL HAVE TO HEAR FROM HIM ON THAT.

14 YOU MAY RESPOND TO THE QUESTION, SIR. I'LL  
15 RESTATE IT FOR YOU.

16 THE QUESTION IS: IS IT CORRECT TO SAY YOU READ  
17 THIS LETTER AT THE TIME, MEANING IN OR AROUND THE TIME IT WAS  
18 WRITTEN?

19 THE WITNESS: I CAN'T -- I'M NOT SURE ABOUT WHEN I  
20 CAN READ IT, BUT THE ONLY THING I CAN ANSWER IS THAT I HAVE  
21 NEVER BEEN INVESTIGATED BY ANYBODY. AND I DID NOT ADMIT --  
22 BECAUSE I WAS NOT ASKED, I DID NOT ADMIT ANYTHING ABOUT THIS.  
23 BY MR. VOSS:

24 Q BUT IS IT ALSO FAIR TO SAY THAT THERE IS NO  
25 INDICATION IN THIS LETTER THAT THE STATEMENTS THAT  
26 I.R.A.C./S.E.A.R.A.C. MISREPRESENTED YOU AS A DOCTOR AND THAT



1 YOU ADMITTED YOU WEREN'T A DOCTOR ARE ATTRIBUTABLE TO THE  
2 DEFENDANTS?

3 A I DID NOT ADMIT IT.

4 Q BUT THERE'S NOTHING IN THIS LETTER THAT TALKS  
5 ABOUT DR. THANG, IS THERE?

6 A NO, I DON'T THINK SO.

7 Q THERE'S NOTHING IN THIS LETTER THAT TALKS ABOUT  
8 THE BOAT PEOPLE S.O.S., IS THERE?

9 A I DON'T THINK SO.

10 Q SO THIS IS JUST THE CONGRESSMAN, THROUGH HIS  
11 OFFICE, TALKING ON THIS LETTER; RIGHT?

12 A I THINK SO.

13 Q SO BASICALLY WHAT YOU'RE SAYING, IF I  
14 UNDERSTAND THIS, IS THAT WITH RESPECT TO THE CONGRESSMAN'S  
15 STATEMENTS ON THIS LETTER, THAT THERE'S A MISREPRESENTATION OF  
16 YOU AS A DOCTOR, AND THAT YOU ADMITTED THAT YOU WERE NOT A  
17 DOCTOR, AND YOU AGAIN SAY THE CONGRESSMAN IS WRONG; IS THAT  
18 RIGHT?

19 A CONGRESSMAN IS WRONG.

20 Q SO NOW WE HAVE TWO CONGRESSMEN THAT SAY WHAT  
21 THEY SAID HERE, SMITH AND DORNAN, AND BOTH TIMES YOUR ISSUE IS  
22 NOT THAT DR. THANG OR B.P.S.O.S. SAID SOMETHING WITH WHICH  
23 YOU'D DISAGREE, BUT THAT THE CONGRESSMEN ARE THE ONES WHO SAID  
24 THINGS WITH WHICH YOU DISAGREE; ISN'T THAT RIGHT?

25 A I DON'T KNOW THE RELATIONSHIP BETWEEN DR. THANG  
26 AND THIS INVESTIGATION. I DON'T -- I'M NOT AWARE OF THAT.

1 Q NOW, I'D ALSO LIKE TO LOOK AT THE TIMELINE OF  
2 THESE EVENTS. LET'S GO BACK TO NUMBER 234, THE LAST LETTER  
3 FIRST.

4 THE COURT: THE APRIL 30TH, 1996 LETTER.

5 MR. VOSS: RIGHT.

6 THE COURT: AND, YES, YOU MAY PUBLISH IT.

7 MR. VOSS: 234.

8 MR. NGUYEN: WE CAN PUBLISH IT?

9 THE COURT: YEAH, IT MAY BE PUBLISHED. THANK YOU FOR  
10 CHECKING.

11 (DOCUMENT PUBLISHED.)

12 BY MR. VOSS:

13 Q SO IN THIS LETTER, THE CONGRESSMAN, IN THE  
14 SECOND SENTENCE STATES: "BEGINNING IN JANUARY, 1996, I HAVE  
15 RECEIVED AN OVERWHELMING NUMBER OF TELEPHONE CALLS AND LETTERS  
16 FROM RESPECTED VIETNAMESE-AMERICAN LEADERS IN MY DISTRICT AND  
17 ACROSS THE UNITED STATES."

18 SO THIS STARTS JANUARY OF 1996; RIGHT?

19 A THAT MAY BE, BUT I CAN'T ANSWER TO CONFIRM THAT  
20 THE CONGRESSMAN RECEIVED MANY OR SOME OR WHATEVER --

21 Q BUT YOU CAN CONFIRM --

22 A I CAN'T ANSWER THIS QUESTION.

23 Q -- HE DIDN'T SAY: IN RESPONSE TO A STATEMENT  
24 FROM DR. THANG AND B.P.S.O.S., I HAVE EXPRESSED THE FOLLOWING  
25 CONCERNS"? THAT'S NOT WHAT HE SAYS AT ALL; RIGHT?

26 A YOU SAY THAT'S NOT WHAT HE SAYS. SO WHO IS

1 "HE" IN HERE?

2 Q DOESN'T SAY ANYTHING ABOUT DR. THANG, DOES IT?

3 A YEAH, I'M NOT AWARE OF ANYTHING ABOUT DR. THANG  
4 SAY OR NOT, IF HE SAID IT OR NOT.

5 Q SO WHAT THE CONGRESSMAN CHOSE TO DO, HE IS  
6 SAYING -- ISN'T IT CORRECT TO SAY IT'S IN RESPONSE TO CONCERNS  
7 RAISED BY RESPECTED LEADERS, PLURAL, AN OVERWHELMING NUMBER OF  
8 TELEPHONE CALLS; CORRECT?

9 A I DON'T THINK I CAN ANSWER THIS QUESTION --

10 Q IT'S WHAT THE LETTER SAYS; RIGHT?

11 A -- BECAUSE I'M NOT AWARE OF THE RELATIONSHIP  
12 BETWEEN MR. DORNAN AND OTHER PEOPLE.

13 (SIMULTANEOUS SPEAKING.)

14 BY MR. VOSS:

15 Q YOU'RE NOT AWARE OF THE RELATIONSHIP. SO  
16 ANYTHING YOU WOULD HAVE TO OFFER --

17 A SO THIS IS A STATEMENT.

18 Q -- IS IT CORRECT TO SAY, REGARDING THE  
19 RELATIONSHIP BETWEEN CONGRESSMAN DORNAN AND OTHER PEOPLE,  
20 YOU'RE NOT AWARE OF; IS THAT RIGHT?

21 A YEAH, I'M NOT AWARE OF THAT.

22 Q THAT WOULD NECESSARILY INCLUDE THE DEFENDANTS,  
23 WOULDN'T IT?

24 A YES.

25 Q SO, AGAIN, THE TIMELINE, THE LAST LETTER IN THE  
26 SEQUENCE, APRIL 30, REFERENCES THE OVERWHELMING PHONE CALLS,

1 ET CETERA, STARTING IN JANUARY OF '96.

2 NOW, LET'S GO BACK TO EXHIBIT 233, IF I MAY  
3 PUBLISH.

4 THE COURT: AND YOU MAY PUBLISH.

5 (DOCUMENT PUBLISHED.)

6 BY MR. VOSS:

7 Q AND THE FIRST SENTENCE OF THIS LETTER SAYS:  
8 "THIS IS TO FOLLOW UP ON MY LETTER TO YOUR OFFICE ON MARCH 6,  
9 1996."

10 DO YOU SEE THAT THERE?

11 A YES, I SEE THAT.

12 Q OKAY. SO JANUARY, THE OVERWHELMING PHONE CALLS  
13 START COMING IN. CONGRESSMAN WRITES TO MS. LIMON ON MARCH 6,  
14 1996.

15 IT'S NOT UNTIL BOTH OF THOSE THINGS HAPPEN  
16 BEFORE DR. THANG WRITES THE LETTER TO MS. LIMON; ISN'T THAT  
17 RIGHT?

18 AND I'LL ADDRESS YOUR ATTENTION TO EXHIBIT  
19 NUMBER 18.

20 A I KNOW NOTHING ABOUT LETTERS FROM THESE  
21 ORGANIZATIONS TO THE OFFICE OF THE CONGRESSMAN DORNAN.

22 Q AS A TIMELINE, IF YOU LOOK AT EXHIBIT NUMBER 18  
23 IN YOUR BOOK.

24 IF I NEED TO APPROACH ...

25 THE COURT: I THINK WE'RE GOING TO NEED TO APPROACH.

26 MR. VOSS: YOU KNOW WHAT, I CAN HAVE IT PUT UP HERE.

1 THE COURT: WE HAVE A CLEAN ONE; CORRECT?

2 MR. HART: WE DO HAVE A CLEAN COPY, BUT IT'S NOT  
3 ELECTRONIC. IT HAS TO BE ON THE ELMO.

4 THE COURT: CAN YOU PUT IT ON THE ELMO? THAT'S FINE.  
5 YOU CAN USE THE ELMO, IF YOU WANT TO.

6 MR. VOSS: I'LL JUST SHOW IT TO HIM.

7 THE COURT: OKAY. YOU MAY APPROACH TO SHOW IT IN THE  
8 BINDER, TO GIVE HIM THE OPPORTUNITY TO LOOK AT IT BEFORE WE  
9 ASK ANY QUESTIONS.

10 MR. VOSS: HERE IT IS. THERE'S JUST NOT A TAB YET.  
11 OKAY. EXHIBIT 18. AND I'M GOING TO ADDRESS YOUR ATTENTION  
12 HERE. ALL RIGHT?

13 THE WITNESS: OKAY.

14 BY MR. VOSS:

15 Q ISN'T IT CORRECT TO SAY THAT EXHIBIT NUMBER 18  
16 IS DATED MARCH 10, 1996?

17 A THIS IS NOT THE SAME, THESE TWO.

18 Q THE EXHIBIT 18 IN YOUR EXHIBIT BINDER THAT  
19 YOU'RE LOOKING AT RIGHT NOW, THAT LETTER IS DATED MARCH 10,  
20 1996; RIGHT?

21 A MARCH 10TH, YES. THIS IS THE EXHIBIT.

22 Q OKAY. SO NOW THAT WE HAVE THE TIMELINE;  
23 JANUARY THE PHONE CALLS ARE COMING IN; MARCH THE CONGRESSMAN  
24 WRITES HIS FIRST LETTER, MARCH 2.

25 AND NOT UNTIL BOTH OF THOSE THINGS --

26 THE COURT: MARCH 6.

1 MR. VOSS: MARCH 6. THANK YOU, YOUR HONOR. IT'S  
2 APRIL 2. SO WE HAVE -- LET ME RESTATE.

3 BY MR. VOSS:

4 Q JANUARY THE PHONE CALLS START COMING INTO THE  
5 CONGRESSMAN'S OFFICE. MARCH 6 THE CONGRESSMAN INITIATES A  
6 LETTER TO MS. LIMON, AS REFERENCED IN EXHIBIT NUMBER 233.

7 AND NOT UNTIL BOTH OF THOSE THINGS HAVE ALREADY  
8 HAPPENED DOES MY CLIENT, DR. THANG, AS EXECUTIVE DIRECTOR OF  
9 B.P.S.O.S., SEND EXHIBIT 18 TO MS. LIMON; ISN'T THAT RIGHT?

10 A YEAH. I SAW THE LETTER FROM DR. THANG TO THE  
11 OFFICE OF O.R.R. ON MARCH 10TH, AND IT DEFAMED ME IN THAT  
12 LETTER. THAT'S WHAT I KNOW.

13 MR. VOSS: OBJECTION. MOVE TO STRIKE AS  
14 NONRESPONSIVE.

15 THE COURT: WAIT, MR. KHOA. HOLD ON.

16 SO THAT WOULD BE GRANTED IN PART. SO THE  
17 RESPONSE, "YEAH, I SAW THE LETTER FROM DR. THANG TO THE OFFICE  
18 OF O.R.R. ON MARCH 10TH," WILL REMAIN. THE BALANCE OF THE  
19 RESPONSE WILL BE STRICKEN AND DISREGARDED BY THE JURY.

20 BY MR. VOSS:

21 Q SO THIS LETTER, THE MARCH 10 LETTER,  
22 EXHIBIT 18, WAS OFFERED INTO EVIDENCE AS A SUGGESTION THAT IT  
23 PROMPTED THE CONGRESSMAN'S INVESTIGATION. BUT THAT'S  
24 IMPOSSIBLE, ISN'T IT, BECAUSE IT DIDN'T COME UNTIL AFTER THE  
25 PHONE CALLS AND AFTER THE CONGRESSMAN HAD ALREADY WRITTEN  
26 ONCE?

1           A           BETWEEN THIS LETTER AND CONGRESSMAN  
2 INVESTIGATION... (READING TO SELF.)

3                   I UNDERSTAND THAT THIS LETTER, OKAY, IS COPIED,  
4 CC'D TO CONGRESSMAN DORNAN.   OKAY.

5           Q           BUT IT COULDN'T HAVE BEEN WHAT STARTED THE  
6 CONGRESSMAN'S INVESTIGATION --

7           A           CC TO CONGRESSMAN DORNAN.

8                   THE COURT:   WAIT.   WAIT.   MR. KHOA, LISTEN TO THE  
9 QUESTION, SO WE DON'T -- WE'RE ANSWERING THE RIGHT QUESTION.  
10 SO LISTEN CAREFULLY TO MR. VOSS' QUESTION, AND THEN YOU MAY  
11 RESPOND.

12 BY MR. VOSS:

13           Q           THIS LETTER COMES AFTER THE CONGRESSMAN'S  
14 STATEMENTS ABOUT PHONE CALLS IN JANUARY, AFTER THE CONGRESSMAN  
15 ALREADY WROTE ONE LETTER, AFTER HE'S RECEIVED THE CONCERNS IN  
16 PARAGRAPH NUMBER 5, THOSE THINGS ALL HAPPENED BEFORE THIS  
17 LETTER IS EVER WRITTEN; ISN'T THAT TRUE?

18           A           YES, THIS ALL TRUE, BUT THE PROBLEM IS THE  
19 LETTER FROM DR. THANG DENOUNCING ME WITH THE OFFICIAL -- OR  
20 THAT'S THE MAIN THING THAT I CAN CONFIRM.

21                   MR. VOSS:   OBJECTION AND MOVE TO STRIKE AS  
22 NONRESPONSIVE.   BEYOND THE SCOPE FOR WHICH THE LETTER WAS  
23 ADMITTED.

24                   THE COURT:   WAIT.   SO THE "YES" RESPONSE WILL REMAIN,  
25 AND THE BALANCE OF THAT RESPONSE WILL BE STRICKEN AS  
26 NONRESPONSIVE AND WILL BE DISREGARDED BY THE JURY.

1 BY MR. VOSS:

2 Q COMING BACK TO THE STATEMENT ON THE BOARD OVER  
3 THERE. NOW THAT WE'VE LOOKED AT THESE THINGS THIS MORNING AND  
4 YESTERDAY AFTERNOON FROM THE CONGRESSMAN'S STATEMENTS, IN HIS  
5 LETTERS OF APRIL 2 AND APRIL 30, ISN'T IT CORRECT TO SAY THAT  
6 THE FIRST SENTENCE ON THE BOARD COMES FROM INFORMATION THAT  
7 WAS WRITTEN BY THE CONGRESSMAN?

8 MR. HART: I NEED TO POSE AN OBJECTION BELATEDLY THAT  
9 ALL OF THESE EXHIBITS SPEAK FOR THEMSELVES ON THAT ISSUE.

10 THE COURT: ALL RIGHT. OVERRULED.

11 YOU MAY RESPOND, SIR.

12 THE WITNESS: I'D LIKE TO SEE, AGAIN, THE FIRST --  
13 THE FIRST SENTENCE ON THE BOARD. COULD YOU --

14 MR. VOSS: YOUR ATTORNEY PUT IT THERE.

15 THE WITNESS: I SAW THIS IN THE LETTER FROM  
16 DR. THANG, IN THE ARTICLE OF DR. THANG.

17 BY MR. VOSS:

18 Q AND ISN'T IT CORRECT TO SAY THAT ALL DR. THANG  
19 WAS DOING IN THAT ARTICLE WAS RESTATING WHAT THE CONGRESSMAN  
20 HAD STATED IN HIS LETTERS, NOTHING MORE?

21 A DR. THANG DID WRITE THIS LETTER, YEAH.

22 Q AND THE SOURCE OF THAT STATEMENT --

23 A AND THE ARTICLE.

24 Q -- IS FROM THE CONGRESSMAN'S LETTERS; RIGHT?

25 A AND THE ARTICLE WAS ON, I REMEMBER WELL,  
26 MAY 25, 2020.



1 MR. VOSS: OBJECTION. MOVE TO STRIKE AS  
2 NONRESPONSIVE. REQUEST THE COURT'S ASSISTANCE.

3 THE COURT: THAT WILL BE GRANTED. THAT LAST RESPONSE  
4 WILL BE STRICKEN.

5 IT'S NOT ASKING FOR THE DATE OR ANYTHING  
6 RELATED TO THE QUESTION -- EXCUSE ME, TO THE ARTICLE OR THE  
7 STATEMENT. SO IF YOU WANT TO RESTATE IT ONE MORE TIME AND  
8 THEN LISTEN CLOSELY TO THE QUESTION NOW.  
9 BY MR. VOSS:

10 Q THE FIRST SENTENCE UP THERE IS NOTHING MORE  
11 THAN A RESTATEMENT OF WHAT CONGRESSMAN DORNAN HAD WRITTEN IN  
12 HIS TWO LETTERS FROM 1996; ISN'T THAT CORRECT?

13 A SO MR. DORNAN REFER TO THE STATEMENT BY  
14 DR. THANG.

15 Q WHERE DO YOU SEE THAT?

16 A THAT'S WHAT I UNDERSTAND WHEN I READ THE LETTER  
17 FROM DR. THANG, THE ARTICLE OF DR. THANG.

18 Q SO DID YOU MISUNDERSTAND? NOW THAT YOU'VE  
19 LOOKED AT ALL THIS, PERHAPS DID YOU MISUNDERSTAND THE  
20 STATEMENT; THAT IT'S NOT FROM DR. THANG, BUT HE IS SIMPLY  
21 REPEATING WHAT THE CONGRESSMAN SAID?

22 A AND I WOULD LIKE TO REFER THAT DR. THANG  
23 REPEATED THESE KIND OF STATEMENT IN OTHER ARTICLE TOO THAT  
24 HE'S WRITING.

25 Q BUT YOU WOULD AGREE WITH ME THAT IN THIS  
26 ARTICLE, IN THAT STATEMENT ON THE BOARD, HE IS, IN YOUR WORDS,

1 REPEATING WHAT THE CONGRESSMAN SAID; IS THAT CORRECT?

2 MR. HART: OBJECTION. IT MISCHARACTERIZES THE TWO  
3 EXHIBITS FROM DORNAN.

4 THE WITNESS: I COULDN'T SAY THAT HE WOULD --

5 THE COURT: WAIT. DR. KHOA -- OR, EXCUSE ME,  
6 PROFESSOR KHOA, WAIT JUST ONE MOMENT, PLEASE.

7 OVERRULED AS TO THE QUESTION.

8 YOU MAY RESPOND NOW, SIR.

9 THE WITNESS: I COULDN'T SAY IF HE REPEAT IT OR NOT.  
10 BY MR. VOSS:

11 Q SO I THOUGHT I HEARD --

12 THE COURT: HOLD ON. WAIT. LET HIM FINISH.

13 YOU MAY FINISH YOUR RESPONSE, SIR.

14 THE WITNESS: I COULD SAY THAT THIS IS THE OWN WORDS  
15 OF DR. THANG. THAT'S WHAT I KNOW. I'M SURE THAT I KNOW.

16 BY MR. VOSS:

17 Q IF I UNDERSTOOD YOUR ANSWER TO THE PRIOR  
18 QUESTION, YOU STATED THAT HE HAD REPEATED THE STATEMENTS BY  
19 THE CONGRESSMAN NOT JUST HERE, BUT IN OTHER ARTICLES AS WELL.

20 AM I CORRECTLY SAYING WHAT YOU SAID TO US A FEW  
21 MOMENTS AGO?

22 A I DID NOT SAY THAT DR. THANG REPEATED THE  
23 STATEMENT OF THE CONGRESSMAN, BUT I SAID THAT HE WROTE HIS  
24 STATEMENT IN OTHER ARTICLE.

25 Q OKAY. WELL, WE'LL LOOK AT THE RECORD.

26 MR. KHOA, IS IT CORRECT TO SAY THAT WHEN

1 DR. THANG WROTE THIS STATEMENT IN HIS ARTICLE, HE WAS MERELY  
2 REPEATING THE INFORMATION THAT HE HAD LEARNED FROM THE  
3 CONGRESSMAN?

4 A I CANNOT SAY THAT.

5 MR. HART: OBJECTION. CALLS FOR SPECULATION.

6 THE COURT: WAIT. GO AHEAD.

7 MR. HART: CALLS FOR SPECULATION.

8 THE COURT: SUSTAINED.

9 BY MR. VOSS:

10 Q ISN'T IS IT CORRECT TO SAY THAT THAT STATEMENT  
11 MERELY REPEATS THE INFORMATION CONTAINED, IN PART, IN THE  
12 LETTERS OF APRIL 2 AND APRIL 30, 1996, FROM CONGRESSMAN  
13 DORNAN?

14 MR. HART: OBJECTION. MISCHARACTERIZES THE EXHIBIT.

15 THE COURT: SUSTAINED.

16 IF YOU WANT TO REPHRASE.

17 BY MR. VOSS:

18 Q THIS SENTENCE THAT YOU "FALSELY CLAIMED HE HELD  
19 A DOCTORAL DEGREE IN THE APPLICATION FOR A GRANT FROM THE  
20 DEPARTMENT OF STATE," THAT'S WHAT THE CONGRESSMAN SAYS IN  
21 PARAGRAPH 5 IS A CONCERN OF HIS, IN HIS APRIL 30 LETTER;  
22 RIGHT?

23 MR. HART: OBJECTION. MISCHARACTERIZES THE EXHIBIT.

24 THE COURT: SUSTAINED.

25 MR. VOSS: OKAY. I'LL REREAD IT.

26 BY MR. VOSS:

1 Q "MR. KHOA'S SELF-PROMOTION AS A PH.D. HOWEVER,  
2 HE RECENTLY ADMITTED HE DOES NOT HAVE SUCH A DEGREE. HIS  
3 MISREPRESENTATION OF ACADEMIC CREDENTIALS MAY HAVE RESULTED IN  
4 RECEIVING STATE DEPARTMENT GRANTS OVER COMPETING APPLICANTS."

5 MR. HART: OBJECTION. THAT'S AN INCOMPLETE READING  
6 OF THE EXHIBIT.

7 THE COURT: OVERRULED.

8 WE'VE WENT THIS PATH. THAT'S AN ACCURATE  
9 READING OF THOSE SENTENCES.

10 MR. HART: VERY GOOD.

11 BY MR. VOSS:

12 Q NOW, WHEN YOU LOOK AT THAT STATEMENT ON THE  
13 CONGRESSMAN'S LETTERHEAD, AND YOU LOOK AT THE SENTENCE ON THE  
14 BOARD, ISN'T IT FAIR TO SAY THAT WHEN DR. THANG WROTE THAT, HE  
15 WAS REASONABLE IN REPEATING WHAT HE HAD LEARNED HERE IN  
16 APRIL 30TH?

17 A I CAN'T SAY DR. THANG REPEATED THIS STATEMENT  
18 BY THE CONGRESSMAN, BECAUSE HE WROTE THIS SEVERAL TIMES IN  
19 OTHER ARTICLES AND OTHER LETTERS.

20 MR. VOSS: OBJECTION. MOVE TO STRIKE AS TO "OTHER  
21 ARTICLES."

22 THE COURT: SUSTAINED. LET ME SEE.

23 BY MR. VOSS:

24 Q AGAIN --

25 THE COURT: WAIT. I NEED TO BE CLEAR. SO WHAT WILL  
26 REMAIN IS: "I CAN'T SAY THAT DR. THANG REPEATED THIS

1 STATEMENT BY CONGRESSMAN," AND THE BALANCE OF THAT WILL BE  
2 STRICKEN BECAUSE IT REFERS TO OTHER ARTICLES.

3 BY MR. VOSS:

4 Q THE APRIL 2 LETTER, WHICH REFERENCES THE EFFORT  
5 TO SECURE GOVERNMENT FUNDS, MISREPRESENTATION OF YOU AS A  
6 DOCTOR, AND AN ADMISSION IN THE FACE OF PUBLIC INQUIRY THAT  
7 YOU'RE NOT A DOCTOR, WHETHER YOU DISAGREE WITH THAT OR NOT,  
8 WOULD YOU AGREE THAT THAT INFORMATION COMES FROM THE  
9 CONGRESSMAN, NOT FROM DR. THANG?

10 MR. HART: OBJECTION. CALLS FOR SPECULATION.

11 THE COURT: SUSTAINED.

12 BY MR. VOSS:

13 Q WOULD YOU AGREE THAT IT COMES FROM THE  
14 CONGRESSMAN?

15 A THE LETTER IS FROM MR. DORNAN, YES, BUT --

16 Q AND DOESN'T IT --

17 THE COURT: LET'S SEE. GO AHEAD -- IF YOU HAVE MORE  
18 TO THAT RESPONSE, THEN WE'LL GO DOWN THAT PATH. IF YOU HAVE  
19 ANYTHING FURTHER TO ADD TO THAT RESPONSE THAT IS RESPONSIVE TO  
20 THE QUESTION ASKED, THEN YOU MAY DO SO.

21 THE WITNESS: THE LETTER FROM MR. DORNAN IS ONE  
22 THING, BUT WHETHER DR. THANG REPEATED THE STATEMENT OF  
23 MR. DORNAN IS ANOTHER THING. AND I DENY THAT. I -- I DON'T  
24 THINK THAT HE REPEAT IT.

25 BY MR. VOSS:

26 Q OKAY. SO IS THERE ANY OTHER SOURCE OF

1 INFORMATION, OF WHICH YOU'RE AWARE, WHERE IT WAS SUGGESTED  
2 THAT YOU FALSELY HELD A DOCTORAL DEGREE IN THE APPLICATION FOR  
3 A GRANT FROM THE DEPARTMENT OF STATE?

4 A DR. THANG SHOULD KNOW ABOUT THAT. I CAN'T  
5 ANSWER FOR HIM --

6 Q HE SHOULD KNOW ABOUT THAT? WHY SHOULD HE --  
7 THE COURT: WAIT. WAIT. WAIT.

8 YOU MAY FINISH, SIR. YOU MAY FINISH YOUR  
9 RESPONSE, MR. KHOA.

10 THE WITNESS: OKAY. SO LET ME SAY CLEARLY THAT THE  
11 LETTER IS FROM MR. DORNAN, BUT I CAN'T SAY THAT THIS IS --  
12 DR. THANG REPEAT THE STATEMENT BY -- BY MR. DORNAN.

13 MR. VOSS: ALL RIGHT.

14 THE COURT: LET ME JUST PAUSE FOR A SECOND. SO WE  
15 KEEP REFERRING TO THE STATE- -- JUST FOR PURPOSES OF THE  
16 RECORD, WHY DON'T WE READ THE STATEMENT ON THE BOARD SO THAT  
17 IT'S IN THE RECORD, BECAUSE IT'S BEEN QUITE A WHILE SINCE  
18 WE'VE BEEN AROUND AND AROUND.

19 SO GO AHEAD, IF YOU COULD. I HAVE A BAD ANGLE  
20 HERE.

21 MR. VOSS: AND IN ALL FAIRNESS, I'VE ONLY BEEN  
22 ADDRESSING THE FIRST SENTENCE IN THAT STATEMENT. SO TO READ  
23 FOR CLARITY, IT WILL BE EXCLUDING THE LAST FOUR WORDS, FIVE  
24 WORDS.

25 SO THE STATEMENT ON THE BOARD SAYS: "MR. KHOA  
26 FALSELY CLAIMED THAT HE HELD A DOCTORAL DEGREE IN THE

1 APPLICATION FOR A GRANT FROM THE DEPARTMENT OF STATE."

2 THE COURT: SO THAT'S WHAT YOU'VE BEEN REFERRING TO  
3 THROUGHOUT THE --

4 MR. VOSS: REFERENCES, YEAH.

5 THE COURT: THAT'S FINE. I JUST WANTED IT SO WE HAVE  
6 IT CLEAR IN THE RECORD, SO IT WASN'T JUST AMBIGUOUS TO WHAT  
7 YOU WERE REFERRING TO.

8 MR. VOSS: I THOUGHT I'D READ IT, BUT I APOLOGIZE.

9 THE COURT: YOU MAY CONTINUE WITH YOUR NEXT QUESTION.  
10 BY MR. VOSS:

11 Q ALL RIGHT. SO DO YOU HAVE ANY INFORMATION TO  
12 SUGGEST THAT DR. THANG WAS NOT RELYING ON THESE STATEMENTS BY  
13 THE CONGRESSMAN WHEN HE WROTE THE STATEMENT IN QUESTION?

14 A I HAVE NO SUCH INFORMATION.

15 Q OKAY.

16 A BUT I KNOW THAT, AS A PROFESSOR AT JOHNS  
17 HOPKINS AND AS PROFESSOR FROM VIETNAM, UNIVERSITY OF SAIGON,  
18 VICE PRESIDENT OF UNIVERSITY OF SAIGON AND --

19 MR. VOSS: OBJECTION. MOVE TO STRIKE.  
20 NONRESPONSIVE.

21 THE COURT: MR. KHOA, THERE'S NOT A QUESTION PENDING  
22 AT THIS TIME. SO THAT LAST STATEMENT WILL BE STRICKEN,  
23 DISREGARDED BY THE JURY.

24 THE WITNESS: WELL, YOUR HONOR, I JUST SAY THAT --

25 THE COURT: WAIT. MR. HART WILL HAVE THE OPPORTUNITY  
26 TO FOLLOW UP WITH YOU AND ASK ANY CLARIFYING QUESTIONS OR

1 ANYTHING ABOUT YOUR TESTIMONY. BUT RIGHT NOW IT'S MR. VOSS'  
2 OPPORTUNITY, SO WE HAVE TO JUST ANSWER MR. VOSS' QUESTION.

3 MR. VOSS: YOUR HONOR, I'M GOING TO HAVE A  
4 SIGNIFICANT SHIFT OF GEARS AT THIS POINT. I DIDN'T KNOW --

5 THE COURT: WELL, LET'S KEEP GOING FOR A LITTLE BIT  
6 SO WE GET A FAIR AMOUNT OF TIME HERE BEFORE THE BREAK.

7 BY MR. VOSS:

8 Q OKAY. I'D ASK THE WITNESS TO TURN TO EXHIBIT  
9 NUMBER 212.

10 MR. HART: YOUR HONOR, I'LL HELP HIM.

11 THE COURT: I WAS JUST GOING TO SAY, MR. HART, IF YOU  
12 WANT TO APPROACH YOUR WITNESS AND HELP HIM SWITCH BINDERS.

13 EXHIBIT 212, IS THAT WHERE WE'RE --

14 MR. HART: THAT'S CORRECT, YOUR HONOR.

15 THE COURT: THANK YOU.

16 MR. VOSS: GIVE HIM AN OPPORTUNITY TO REVIEW THAT.

17 THE COURT: MR. KHOA, IF COULD YOU TAKE A COUPLE  
18 MOMENTS TO REVIEW EXHIBIT 212. I THINK IT'S TWO PAGES. TAKE  
19 YOUR TIME AND FAMILIARIZE YOURSELF WITH THAT DOCUMENT. OKAY?

20 THE WITNESS: YES.

21 BY MR. VOSS:

22 Q ARE YOU READY TO PROCEED, SIR? YOU'VE HAD AN  
23 OPPORTUNITY TO READ IT?

24 A CAN I ANSWER NOW?

25 THE COURT: YES.

26 THE WITNESS: THIS IS WRITTEN BY MY STAFF.



1 THE COURT: WAIT. WAIT. HE JUST WANTS TO KNOW, AT  
2 THIS POINT, IF YOU'VE LOOKED AT THIS. SO NOW LET'S LISTEN TO  
3 WHAT HIS QUESTIONS ARE.

4 YOU MAY ASK YOUR QUESTIONS, MR. VOSS.

5 MR. VOSS: THANK YOU, YOUR HONOR.

6 BY MR. VOSS:

7 Q SO IS IT CORRECT TO SAY THAT EXHIBIT 212 IS A  
8 STATEMENT OF YOUR BIOGRAPHICAL DATA? THAT'S WHAT IT SAYS ON  
9 THE TOP; RIGHT?

10 A YES.

11 Q AND THIS BIOGRAPHICAL DATA ABOUT YOU IS  
12 CONTAINED ON INDOCHINA RESOURCE ACTION CENTER LETTERHEAD;  
13 ISN'T THAT CORRECT?

14 A YES.

15 Q AND WE DON'T SEE A SIGNATURE OR AN AUTHOR  
16 ANYWHERE ON THIS; RIGHT?

17 A IT WAS NO SIGNATURE OR AUTHOR NAME.

18 Q OKAY. BUT HAVE YOU SEEN THIS DOCUMENT BEFORE?

19 A YES.

20 Q AND IS IT CORRECT TO SAY THAT THIS DOCUMENT WAS  
21 USED BY I.R.A.C. DURING THE TIME YOU WERE PRESIDENT OF THE  
22 ORGANIZATION?

23 A THIS DOCUMENT IS WRITTEN BY THE STAFF TO  
24 INTRODUCE ME TO THE AUDIENCE OR TO FOREIGNERS OR TO VISITORS  
25 OR --

26 Q AND THAT WAS DONE WHILE YOU WERE THE PRESIDENT

1 OF THE ORGANIZATION; RIGHT?

2 A YES.

3 AND AS I SAID YESTERDAY, THAT I ACCEPT THE FACT  
4 THAT PROFESSOR OR DOCTOR WAS --

5 MR. VOSS: OBJECTION. MOVE TO STRIKE BEYOND "YES."

6 THE WITNESS: -- IT WAS INTERCHANGEABLY.

7 THE COURT: MR. KHOA, WE'RE GETTING BEYOND THE  
8 QUESTION THERE.

9 SO THE MOTION TO STRIKE WILL BE GRANTED.  
10 EVERYTHING AFTER "YES" WILL BE STRICKEN AND DISREGARDED BY THE  
11 JURY, PLEASE.

12 BY MR. VOSS:

13 Q SO I BELIEVE YOU JUST SAID THIS BIOGRAPHICAL  
14 DATA FROM I.R.A.C. ABOUT YOU WAS PROVIDED TO INTRODUCE PEOPLE  
15 TO YOU WHEN YOU WERE BEING A SPEAKER, OR HOW WAS IT USED?

16 A YES.

17 THE COURT: HE RESPONDED WITH "YES."

18 MR. VOSS: OKAY.

19 BY MR. VOSS:

20 Q AND IS IT ALSO FAIR TO SAY THAT IT WAS USED FOR  
21 MANY YEARS?

22 A IT WAS NOT A DATE IN HERE. I CAN'T SAY HOW  
23 MANY YEARS. OKAY.

24 Q I'M ASKING YOU YOUR RECOLLECTION. IS IT FAIR  
25 TO SAY THAT YOU RECOLLECT THIS BIOGRAPHICAL DATA ABOUT YOU  
26 BEING USED BY I.R.A.C. FOR MANY YEARS WHILE YOU WERE THE

1 PRESIDENT OF THE ORGANIZATION?

2 A YES.

3 Q AND IN THIS DOCUMENT, ISN'T IT CORRECT TO SAY  
4 THAT IN PARAGRAPH 2, IT STARTS BY SAYING: "DR. KHOA HAS BEEN  
5 ACTIVE IN REFUGEE AFFAIRS"?

6 A YES.

7 Q AND IN THE FINAL PARAGRAPH OF YOUR BIOGRAPHIC  
8 DATA USED BY I.R.A.C. WHEN YOU WERE PRESIDENT, DOESN'T IT ALSO  
9 SAY THAT: "DR. KHOA WAS FORMERLY DEPUTY MINISTER OF CULTURE  
10 AND EDUCATION"?

11 A YES.

12 Q AND AS PRESIDENT OF I.R.A.C., YOU COULD HAVE  
13 CORRECTED THAT ANY TIME YOU WANTED, COULDN'T YOU?

14 A YEAH, IF NECESSARY.

15 Q SO WE HAVE YOUR BIOGRAPHICAL DATA TO INTRODUCE  
16 YOU REFERRING TO YOU AS DR. KHOA, NOT ONCE BUT TWICE, AND YOU  
17 COULD HAVE CORRECTED IT BUT NEVER DID; IS THAT CORRECT?

18 A YEAH, BUT IN THE SAME DOCUMENT, NOT IN  
19 DIFFERENT TIMES.

20 MR. VOSS: I MOVE THAT EXHIBIT NUMBER 212 BE RECEIVED  
21 INTO EVIDENCE.

22 MR. HART: OBJECT. HEARSAY AND RELEVANCE.

23 THE COURT: OVERRULED AS TO BOTH OF THOSE. IT'S NOT  
24 OFFERED FOR THE TRUTH OF THE MATTER AND ALSO A PARTY-OPPONENT.

25 THAT IS ADMITTED, JUST SO THE RECORD'S CLEAR.

26 (EXHIBIT 212 ADMITTED.)

1 MR. VOSS: NEXT, DIRECT THE WITNESS' ATTENTION TO  
2 EXHIBIT NUMBER 213.

3 THE COURT: SO THE NEXT EXHIBIT TAB THERE, MR. KHOA,  
4 SEE THOSE NUMBERED TABS DOWN THE RIGHT-HAND SIDE, IF YOU COULD  
5 TURN TO 213. THAT LOOKS LIKE IT.

6 MR. VOSS: MAY I PROCEED?

7 THE COURT: YES.

8 BY MR. VOSS:

9 Q DO YOU RECOGNIZE THIS DOCUMENT, SIR?

10 THE COURT: TAKE YOUR TIME TO REVIEW IT.

11 THE WITNESS: YEAH, I SEE THAT.

12 BY MR. VOSS:

13 Q ARE YOU FAMILIAR WITH THE VIETNAMESE AMERICAN  
14 EDUCATION FOUNDATION?

15 A NOT VERY MUCH, BUT I KNOW THEM. OKAY.

16 Q IS IT FAIR TO SAY THAT YOU WERE, IN FACT, A  
17 DIRECTOR OF THE VIETNAMESE AMERICAN EDUCATION FOUNDATION?

18 A YES.

19 Q AND IF YOU LOOK ON THIS PAGE, NEAR THE BOTTOM,  
20 THERE'S A LIST OF THE ORGANIZATIONAL STRUCTURE AND THE  
21 V.A.E.F. DIRECTORS.

22 DO YOU SEE THAT THERE?

23 A YES, I SEE THAT.

24 Q AND ONE OF THOSE DIRECTORS IS YOU; RIGHT?

25 A YES.

26 Q AND READING FROM THAT DOCUMENT, IT SAYS: "KHOA

1 XUAN LE, PH.D., DIRECTOR OF INDOCHINESE RESOURCE ACTION  
2 CENTER."

3 DO YOU SEE THAT?

4 A SO THIS IS FROM OTHER PEOPLE, FROM OTHER  
5 ORGANIZATIONS, NOT FROM MYSELF.

6 Q DO YOU SEE THAT THERE?

7 A MY STAFF OR OTHER PEOPLE THAT I --

8 THE COURT: MR. KHOA, WE'RE GETTING AHEAD OF  
9 OURSELVES THERE. THE QUESTION IS SIMPLY WHETHER OR NOT YOU  
10 SEE THAT STATEMENT ON THE PAGE.

11 THE WITNESS: YES, I SEE THAT.

12 BY MR. VOSS:

13 Q OKAY. AS A DIRECTOR OF THE VIETNAMESE AMERICAN  
14 EDUCATION FOUNDATION THAT HELD YOU OUT AS A PH.D., DID YOU  
15 EVER TAKE ANY ACTION TO CORRECT THAT STATEMENT?

16 MR. HART: OBJECTION. FOUNDATION.

17 THE COURT: SUSTAINED.

18 BY MR. VOSS:

19 Q YOU'VE SEEN THIS BEFORE, RIGHT, THIS DOCUMENT?

20 A YES, I SEE -- I'VE SEEN THIS.

21 Q OKAY. DO YOU HAVE ANY REASON TO BELIEVE THAT  
22 IT'S INCORRECTLY PRODUCED HERE TO YOU TODAY, OR IS IT A TRUE  
23 AND CORRECT COPY?

24 A YOU KEEP READING THAT PH.D. THING, WHICH I SAY  
25 THAT NOT FOR MYSELF.

26 Q IS THIS DOCUMENT A TRUE AND CORRECT COPY, AS

1 FAR AS YOU KNOW, OF THE VIETNAMESE AMERICAN EDUCATION  
2 FOUNDATION INTRODUCTION HOMEPAGE, THAT IT SAYS ON THE TOP?

3 MR. HART: OBJECTION. YOUR HONOR, IT'S ONE PAGE,  
4 WHICH PURPORTS TO BE PAGE 10 OF SOMETHING ELSE. WE DON'T HAVE  
5 ANY FOUNDATION TO SUPPORT WHERE THIS DOCUMENT CAME FROM.

6 THE COURT: OVERRULED.

7 HE'S JUST ASKED IF HE'S FAMILIAR WITH THIS OR  
8 IT'S ACCURATE. THAT'S THE EXTENT OF IT. WE'LL SEE HOW MUCH  
9 FOUNDATION WE GET, ONE QUESTION AT A TIME.

10 MR. HART: VERY GOOD, YOUR HONOR.

11 THE COURT: WHY DON'T YOU RESTATE THE QUESTION,  
12 MR. VOSS.

13 BY MR. VOSS:

14 Q DO YOU BELIEVE THIS IS A TRUE AND CORRECT COPY  
15 OF THE VIETNAMESE AMERICAN EDUCATION FOUNDATION INTRODUCTION  
16 HOMEPAGE, THIS ONE PAGE?

17 A I SAY THAT I SEE THIS. I CANNOT SAY THAT I'M  
18 FAMILIAR WITH THESE THINGS, BECAUSE IT -- IT HAPPENS THAT SO  
19 MANY ORGANIZATION, SO MANY OTHER PEOPLE CALL ME "DOCTOR," AND  
20 I ACCEPT THE FACT THAT I DON'T NEED TO CORRECT EVERY TIME.

21 Q OKAY. SO IS IT CORRECT TO SAY, THEN, THAT YOU  
22 BELIEVE THIS TO BE A TRUE AND CORRECT COPY OF THE DOCUMENT?

23 MR. HART: OBJECTION. MISSTATES HIS TESTIMONY.

24 THE COURT: SUSTAINED.

25 BY MR. VOSS:

26 Q IS THERE ANYTHING ON THIS DOCUMENT THAT YOU

1 BELIEVE TO HAVE BEEN ALTERED IN ANY WAY FROM WHEN YOU SAW IT?

2 A I DON'T KNOW. I DON'T THINK SO.

3 Q AND YOU DID SEE IT IN THE PAST; CORRECT?

4 A YES.

5 MR. VOSS: MOVE THAT IT BE RECEIVED INTO EVIDENCE.

6 MR. HART: OBJECTION. RELEVANCE AND HEARSAY.

7 THE COURT: ANYTHING ELSE?

8 MR. HART: WELL, GIVE ME A MINUTE, AND I'LL THINK  
9 ABOUT IT.

10 THE COURT: WE DON'T HAVE ENOUGH TO GET THIS ONE IN  
11 AT THIS POINT IN TIME FOUNDATIONALLY.

12 MR. HART: FOUNDATION. SORRY.

13 THE COURT: WHY DON'T WE GO AHEAD -- WE'RE RIGHT AT  
14 THAT 10:30 TIME. WHY DON'T WE GO AHEAD AND TAKE A BREAK, AND  
15 THEN YOU CAN SEE WHERE TO PROCEED NEXT.

16 SO IT IS RIGHT -- WE'LL SAY IT'S 10:30. WE'LL  
17 BE BACK AT 10:45, LADIES AND GENTLEMEN, TO COMPLETE OUR  
18 MORNING SESSION.

19 THANK YOU AGAIN SO MUCH FOR YOUR TIME.

20 (JURY EXCUSED FOR MORNING RECESS.)

21 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT OUTSIDE THE  
22 PRESENCE OF THE JURY:)

23 THE COURT: ALL RIGHT. THEN WE ARE OUTSIDE THE  
24 PRESENCE OF THE JURY. JUST TO KIND OF SPITBALL SCHEDULING. I  
25 MEAN, I UNDERSTAND THE CHALLENGES, BUT, I MEAN, IN TERMS OF  
26 MATERIAL STILL TO GO.

1 MR. VOSS: IT'S GOING REALLY SLOW.

2 THE COURT: I UNDERSTAND. BUT IS THERE ANY --

3 MR. VOSS: I MEAN, AT THIS PACE, IT CERTAINLY IS  
4 GOING TO BE A COUPLE MORE HOURS. I CAN'T -- IT'S TAKING ME --

5 THE COURT: I JUST WANT TO KNOW WHERE YOU ARE IN  
6 TERMS OF -- LET ME DO IT THIS WAY: PERCENTAGE OF MATERIAL OR  
7 TOPICS YOU WISH TO COVER AND HOW MUCH OF THAT HAVE YOU  
8 COVERED? THAT MIGHT BE A FAIR EVALUATION POINT.

9 HALFWAY?

10 MR. VOSS: I LITERALLY HAVE IT. SO I CAN GIVE YOU AN  
11 EXACT ESTIMATE OF THE -- JUST SHY OF HALFWAY.

12 MR. HART: IT'S FINE, JUDGE. IT IS WHAT IT IS.

13 THE COURT: IT IS, AND I'M NOT --

14 MR. HART: IF WE DON'T HAVE A LOT MORE WITNESSES,  
15 THEN I THINK WE'RE FINE.

16 THE COURT: I'M NOT BUSTING ANYBODY'S CHOPS. I'M  
17 JUST TRYING TO MANAGE, YOU KNOW, BREAKS AND TIMING AND THE  
18 DAYS IS ALL. SO I'M GOING TO REPEATEDLY ASK THOSE QUESTIONS,  
19 BUT THAT HELPS ME TO GAUGE WHERE WE ARE, WHAT'S NEXT.

20 MR. VOSS: APOLOGIES.

21 THE COURT: LIKE I SAID, I'M NOT POINTING ANY FINGERS  
22 AT ANYONE. I'M JUST TRYING TO GET AN UNDERSTANDING SO I CAN  
23 MANAGE BREAKS AND DAYS AND THINGS ALONG THOSE LINES.

24 MR. HART: I THINK WITH THIS PARTICULAR WITNESS, IT'S  
25 PROBLEMATIC FOR ALL OF US, AND I APPRECIATE THAT WE DON'T TRY  
26 TO RUSH IT.



1 THE COURT: AND I DON'T THINK ANYBODY IS. YEAH,  
2 WE'RE NOT GOING TO. BUT LIKE I SAID, I JUST NEED TO KIND OF  
3 HAVE A SENSE OF HOW WE ARE PROGRESSING ALONG SO I CAN GAUGE  
4 BREAKS AND, YOU KNOW, DAYS LEFT IN THE TRIALS AND THINGS ALONG  
5 THOSE LINES. SO THAT'S ALL. IT WAS AN INNOCENT QUESTION.

6 MR. VOSS: AND WITH RESPECT TO THAT, I APOLOGIZE IF  
7 I'M OCCASIONALLY STEPPING ON A FURTHER ANSWER. OFTENTIMES,  
8 THE ANSWER COMES, THEN THERE'S A PAUSE. I MOVE INTO THE NEXT  
9 QUESTION, AND MORE WORDS COME OUT. SO WHEN I HEAR THAT PAUSE,  
10 I'M THINKING I'M OKAY TO MOVE ON.

11 THE COURT: WE'RE GOING TO ALL DO OUR VERY, VERY BEST  
12 TO BE RESPECTFUL OF EVERYBODY'S OPPORTUNITY TO MAKE THEIR  
13 COMPLETE STATEMENTS. AND SO WE'LL NAVIGATE, AND I'M TRYING  
14 TO DO AS MUCH AS I CAN TO --

15 MR. VOSS: HELP.

16 THE COURT: -- NAVIGATE ALONG WITH EVERYBODY ELSE.  
17 SO WE'LL CONTINUE WITH THOSE EFFORTS.

18 EVERYBODY HAVE A GOOD BREAK. AT 10:45, WE'LL  
19 PICK BACK UP AT.

20 (MORNING RECESS.)

21 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT OUTSIDE THE  
22 PRESENCE OF THE JURY:)

23 THE COURT: AND WE'RE BACK ON THE RECORD IN KHOA V.  
24 THANG. WE ARE OUTSIDE THE PRESENCE OF THE JURY.

25 MR. VOSS, YOU HAD SOMETHING YOU WANTED TO RAISE  
26 REAL QUICKLY?

1                   MR. VOSS: YES, REAL QUICKLY, YOUR HONOR. WE RENEW  
2 OUR REQUEST THAT EXHIBIT 18 BE REMOVED AS A RECEIVED EXHIBIT.  
3 THE COURT HAD CLEARLY INDICATED THAT THAT SAID DOCUMENT WAS  
4 ADMITTED. AND I WROTE DOWN IN QUOTE, "ONLY ALLOWED FOR THE  
5 SUGGESTION IT PROMPTED THE CONGRESSMAN'S INVESTIGATION."

6                   AT THE TIME THAT IT WAS RECEIVED, THE COURT WAS  
7 NOT AWARE OF THE TIMELINE; IN OTHER WORDS, THAT THE  
8 INVESTIGATION HAD ALREADY BEEN COMMENCED BEFORE THIS LETTER  
9 WAS WRITTEN. TO EXTENT THAT IT IS THEREFORE RECEIVED AS THE  
10 CAUSE OR THE PROMPTING OF THE CONGRESSMAN'S INVESTIGATION IS  
11 OUTWEIGHED BY THE SUBSTANTIALLY INFLAMMATORY LANGUAGE  
12 CONTAINED THEREIN, INCLUDING ATTEMPTS TO DOUBLE-CROSS AND  
13 OTHER INFLAMMATORY LANGUAGE IN THE DOCUMENT.

14                   AND WE, THEREFORE, SUBMIT THAT ITS PROBATIVE  
15 VALUE, WHICH IS AT THIS POINT ZERO FOR PURPOSES OF IT BEING  
16 THE SUGGESTION THAT IT PROMPTED THE INVESTIGATION, IS WELL  
17 OUTWEIGHED BY ITS PREJUDICIAL EFFECT.

18                   THE COURT: ALL RIGHT. MR. HART, REAL QUICKLY,  
19 BEFORE WE BRING IN THE JURY.

20                   MR. HART: I DISAGREE THAT THE PROBATIVE VALUE IS  
21 OUTWEIGHED. I DON'T THINK WE KNOW EXACTLY WHAT THE TOTAL  
22 PROBATIVE VALUE THIS EXHIBIT IS.

23                   AND I ALSO DON'T THINK MR. VOSS HAS PROVED THAT  
24 IT HAS ZERO PROBATIVE VALUE. GIVEN THAT IT'S BEEN ADMITTED,  
25 PUBLISHED AND DISCUSSED IN FRONT OF THE JURY, I THINK IT'S A  
26 LITTLE LATE TO TRY TO PULL IT BACK.

1 THE COURT: ALL RIGHT. SO I'LL THINK ABOUT IT, BUT  
2 I'M NOT INCLINED -- IT'S NOT A MATTER OF DISPROVING SOMETHING,  
3 AND SO I THINK -- I THINK THE JURY, IF SOMEONE WANTS TO -- I  
4 MEAN, IF IT'S OFFERED FOR A PURPOSE, AND THE JURY IS NOT  
5 CONVINCED OF IT, THEN EVERYBODY, AS WITH ANY OTHER PIECE OF  
6 EVIDENCE OR ARGUMENT, ALWAYS RUNS THE RISK OF THE HIGHLY  
7 TECHNICAL TERM "EGG ON YOUR FACE."

8 MR. VOSS: THANK YOU, YOUR HONOR.

9 THE COURT: THANK YOU VERY MUCH.

10 MR. HART: THANK YOU, JUDGE.

11 THE COURT: WE GOT EVERYBODY THERE, DONNIE?

12 COURTROOM ATTENDANT: WE DO, YOUR HONOR.

13 THE COURT: ALL RIGHT. LET'S GIVE MR. KHOA A MOMENT  
14 SO -- BECAUSE THEY ARE SO EXCITED TO COME IN, I DON'T WANT  
15 THEM STAMPEDING HIM.

16 ALL RIGHT. THEN, YES, THEN WE CAN BRING THEM  
17 IN NOW.

18 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT IN THE  
19 PRESENCE OF THE JURY:)

20 THE COURT: ALL RIGHT. THEN WE HAVE BEEN REJOINED BY  
21 ALL OF OUR JURORS. THANK YOU YET AGAIN, LADIES AND GENTLEMEN.

22 AND, MR. VOSS, WE WILL DIVE RIGHT BACK IN.

23 MR. VOSS: THANK YOU, YOUR HONOR.

24 YOUR HONOR, WE'RE GOING TO GO BACK TO  
25 EXHIBIT NUMBER 212, PLEASE.

26 THE COURT: 212. ALL RIGHT. THEN, MR. KHOA, WE'RE

1 GOING TO TURN BACK TO A DIFFERENT EXHIBIT, TO EXHIBIT 212.

2 THE WITNESS: 212.

3 THE COURT: SO BACK THE OTHER DIRECTION. THERE WE  
4 GO. THAT'S IT RIGHT THERE.

5 THE WITNESS: THANK YOU, SIR.

6 BY MR. VOSS:

7 Q DR. KHOA, THIS IS, AGAIN, THE DOCUMENT WITH  
8 YOUR BIOGRAPHICAL DATA. IT MAKES REFERENCE TO A NUMBER OF  
9 ACTIVITIES OF YOURS, INCLUDING THAT: "FOR THE PAST 17 YEARS,  
10 KHOA'S WORKED WITH NUMEROUS PUBLIC AND PRIVATE INSTITUTIONS  
11 AND HAS SPOKEN AND WRITTEN ON A WIDE VARIETY OF ISSUES ON  
12 REFUGEE PROTECTION AND ASSISTANCE."

13 DO YOU AGREE THAT THAT STATEMENT'S ACCURATE?

14 A THE STATEMENT IS CORRECT.

15 Q IT GOES ON IN YOUR BIO TO SAY: "HE IS THE  
16 CHIEF EDITOR OF THE BRIDGE, A QUARTERLY PUBLICATION PRODUCED  
17 BY I.R.A.C. SINCE 1984."

18 ALSO A CORRECT STATEMENT?

19 A IT'S ALSO A CORRECT STATEMENT.

20 Q IT SAYS: "HE HAS TESTIFIED MANY TIMES BEFORE  
21 THE UNITED STATES CONGRESS, BOTH HOUSE AND SENATE, ON REFUGEE  
22 POLICIES AND PROGRAMS."

23 CORRECT STATEMENT?

24 A YEAH, I TESTIFY PLENTY OF TIME BEFORE THE  
25 CONGRESS.

26 Q IS IT ALSO CORRECT TO SAY THAT YOU HAD

1 "ATTENDED MANY INTERNATIONAL MEETINGS ON REFUGEE PROTECTION,  
2 HUMAN RIGHTS, AND DURABLE SOLUTIONS TO THE INDOCHINESE REFUGEE  
3 PROBLEM"?

4 A YES, I ATTEND MANY MEETINGS, INTERNATIONAL  
5 MEETINGS.

6 Q IS IT ALSO CORRECT TO SAY THAT "MANY SENATORS  
7 AND REPRESENTATIVES AND INTERNATIONAL POLICYMAKERS HAVE  
8 PRAISED YOU FOR RESOURCEFULNESS"?

9 A YES.

10 Q WOULD YOU AGREE WITH THE STATEMENT THAT YOU ARE  
11 A "PUBLIC PERSON IN THE COMMUNITY FOR YOUR HUMANITARIAN AND  
12 COMMUNITY EMPOWERMENT WORK"?

13 MR. HART: OBJECTION. VAGUE AS TO TIME.

14 THE COURT: DO WE HAVE--

15 THE WITNESS: YES.

16 THE COURT: WAIT JUST ONE MOMENT, MR. KHOA. WE'RE  
17 GOING TO LOOK FOR SOME --

18 IS THAT A STATEMENT STRAIGHT FROM --

19 MR. VOSS: WELL, SPECIAL INTERROGATORY NUMBER 22  
20 RESPONSE, AMENDED RESPONSE. IT'S NOT IN THIS DOCUMENT.

21 THE COURT: OKAY. SO YOU CHANGED GEARS ON US.

22 MR. VOSS: YEAH.

23 THE COURT: WELL, THEN, WHY DON'T WE RESTATE THE  
24 QUESTION SO WE HAVE A BETTER SENSE OF IT THEN.

25 BY MR. VOSS:

26 Q IN YOUR AMENDED RESPONSES TO SPECIAL

1 INTERROGATORIES, YOU STATED THAT, QUOTE: "I AM A PUBLIC  
2 PERSON IN THE COMMUNITY FOR MY HUMANITARIAN AND COMMUNITY  
3 EMPOWERMENT WORK."

4 IS THAT A CORRECT AND ACCURATE STATEMENT?

5 A I SAY THAT, YES, I MET -- I TESTIFIED BEFORE  
6 THE CONGRESS, AND I ATTEND MANY CONFERENCES. BUT WHETHER I'M  
7 A PUBLIC PERSON, THAT'S UP TO THE PUBLIC. I DON'T KNOW.

8 Q BUT YOU SAID IN YOUR OWN INTERROGATORY ANSWERS  
9 THAT YOU ARE A PUBLIC PERSON IN THE COMMUNITY; RIGHT?

10 A YES, I SAY THAT.

11 Q WAS IT ALSO CORRECT TO SAY, WHEN YOU ANSWERED  
12 THAT, QUOTE: "I HAD MANY READERS AND VIEWERS OF MY PUBLISHED  
13 BOOK, ARTICLES, OR VIDEOS"?

14 IS THAT TRUTHFUL AND CORRECT?

15 A YEAH, WHAT I SAID IN THE BOOK AND WHAT I SAID  
16 TO THE PUBLIC SHOULD BE CORRECT.

17 Q THEN YOU HAVE MANY READERS AND VIEWERS;  
18 CORRECT?

19 A YEAH, I DON'T KNOW HOW MANY OF THEM.

20 Q WELL, ISN'T IT ALSO CORRECT THAT YOU ANSWERED  
21 IN YOUR INTERROGATORY THAT A VIDEO INTERVIEW OF YOU BY THE BBC  
22 WAS VIEWED BY 5.6 MILLION PEOPLE, WITH ALMOST 6,000 COMMENTS?

23 A THAT'S ON VIETNAM, NOTHING ABOUT R.O.V.R. OR  
24 WHATEVER.

25 Q YOU'VE GOT AN ENORMOUS NUMBER OF PEOPLE THAT  
26 HAVE HEARD YOU TESTIFY ON A VARIETY OF TOPICS RELATING TO

1 VIETNAM; ISN'T THAT CORRECT?

2 A I LEARNED THAT MANY OF THEM ARE IN VIETNAM.  
3 THIS IS FOR THE VIETNAMESE READERS.

4 Q IS IT CORRECT TO SAY THAT YOU HAVE NOT EVER  
5 CORRECTED PEOPLE WHO REFERENCED YOU AS A "DOCTOR"?

6 A I DON'T SAY THAT I HAVE NOT EVER CORRECTED.  
7 SOMETIME, ESPECIALLY IN THE BEGINNING, BUT THEN I CANNOT AND I  
8 DO NOT WANT TO CORRECT EVERY TIME.

9 Q WHEN IS THE LAST TIME YOU EVER RECOLLECT  
10 CORRECTING ANYONE FROM REFERRING TO YOU AS "DOCTOR"?

11 A I DON'T REMEMBER WHEN IS THE LAST TIME.

12 Q YOU SAID "IN THE BEGINNING." CAN YOU ESTIMATE  
13 FOR ME WHAT YOU MEANT BY "IN THE BEGINNING," WHAT YEAR THAT  
14 MIGHT BE OR WHAT DECADE?

15 A IN THE FIRST YEARS, WHEN I ARRIVE IN THE U.S.

16 Q SO IN THE 1970S WOULD BE THE LAST TIME YOU  
17 CORRECTED ANYONE FROM REFERRING TO YOU AS "DOCTOR"; IS THAT  
18 CORRECT?

19 A WELL, IN THE EARLY '80S.

20 Q MAYBE.

21 DO YOU RECOLLECT ANY PARTICULAR TIME IN THE  
22 EARLY '80S WHERE YOU CORRECTED ANYONE FROM REFERRING TO YOU AS  
23 "DOCTOR"?

24 A I COULDN'T REMEMBER THAT SPECIFICALLY.

25 Q SAME QUESTIONS, BUT DO YOU RECOLLECT EVER  
26 CORRECTING PEOPLE REFERENCING YOU AS A PH.D.?

1           A           YES, AROUND THE LATE '70 AND EARLY '80S.

2           Q           AND THAT TIME FRAME WOULD BE PRIOR TO THE FIRST  
3 OF ANY GRANT APPLICATIONS BEING SUBMITTED TO THE  
4 UNITED STATES, CORRECT, BY YOU OR S.E.A.R.A.C. OR I.R.A.C.?

5           A           I CAN'T ANSWER THIS, BECAUSE IT MAY BE THE SAME  
6 TIME OR MAYBE BEFORE OR AFTER. I CAN'T SAY.

7           Q           ISN'T IT CORRECT TO SAY THAT YOU HAD PREVIOUSLY  
8 SAID THAT YOU DID NOT SUBMIT ANY GRANTS UNTIL MUCH AFTER THE  
9 EARLY 1980S?

10          A           YES, THAT'S A FACT; THAT I HAVE NEVER SUBMITTED  
11 ANY GRANT APPLICATION WITH THE TITLE "PH.D." OR "DOCTOR".

12          Q           DO YOU KNOW WHEN YOU FIRST SUBMITTED A GRANT  
13 APPLICATION?

14          A           SHOULD BE IN THE EARLY '80S OR MID '80S.

15          Q           AFTER YOU LAST EVER CORRECTED ANYBODY FROM  
16 USING THE PHRASE "PH.D." OR "DOCTOR"; RIGHT?

17          A           YES.

18          Q           DID YOU EVER CORRECT ANYONE FROM REFERRING TO  
19 YOU AS "DOCTOR" IN WRITING?

20          A           NO, THIS IS IN CONVERSATION.

21          Q           SO IT'S CORRECT TO SAY THERE'S NOT ONE SINGLE  
22 DOCUMENT IN WHICH YOU EVER SAID TO SOMEBODY NOT TO REFER TO  
23 YOU AS "DOCTOR"?

24          A           NO.

25          Q           DIRECT THE WITNESS' ATTENTION TO EXHIBIT  
26 NUMBER 214.



1 THE WITNESS: THIS ONE, SIR?

2 THE COURT: YES, I BELIEVE SO.

3 THE WITNESS: 214?

4 THE COURT: YES, THAT SHOULD BE 214.

5 BY MR. VOSS:

6 Q DO YOU SEE THE DOCUMENT ENTITLED "THE RESPONSES  
7 TO ISSUES OF CONCERN, TECHNICAL PROPOSAL"?

8 A YES, I SEE THAT.

9 Q ARE YOU FAMILIAR WITH THIS DOCUMENT?

10 A SO WHAT IS THE QUESTIONS ABOUT THIS?

11 Q ARE YOU FAMILIAR WITH THIS DOCUMENT?

12 A YEAH, I KNOW THAT THESE KIND OF PROCEDURES THAT  
13 THE --

14 THE COURT: DR. KHOA, THE QUESTION IS: THIS SPECIFIC  
15 DOCUMENT, NOT JUST GENERALIZED, THIS SPECIFIC DOCUMENT. AND  
16 IT'S JUST SIMPLY WHETHER OR NOT YOU ARE FAMILIAR WITH THE --

17 AND WE NEED TO PAUSE ONE MOMENT.

18 MR. HART: YES, WE HAVE AN AGREEMENT. SHE'S NOT  
19 GOING TO BE RECALLED, SO ...

20 MR. VOSS: THAT'S ACTUALLY CORRECT.

21 THE COURT: OKAY. I JUST WANTED TO MAKE SURE.

22 MR. VOSS: SO IT'S NO LONGER AN ISSUE.

23 THE COURT: OKAY. THAT'S FINE. THANK YOU.

24 SO, AGAIN, MR. KHOA, LET ME RESTATE: THE  
25 QUESTION IS SIMPLY WHETHER OR NOT YOU ARE FAMILIAR WITH THIS  
26 SPECIFIC DOCUMENT, NOT DOCUMENTS OF THIS TYPE OR CATEGORY.

1 IT'S THIS PARTICULAR DOCUMENT.

2 SO TAKE YOUR TIME, LOOK AT IT, AND SEE IF YOU  
3 HAVE FAMILIARITY WITH THIS SPECIFIC DOCUMENT.

4 THE WITNESS: YEAH, I HAVE SOME FAMILIARITY WITH  
5 THIS, BUT I DON'T THINK THAT I NEED TO -- TO READ IT, BECAUSE  
6 IT'S --

7 THE COURT: MR. KHOA, WE'LL SEE WHATEVER THE NEXT  
8 QUESTION IS, BUT WE JUST HAVE TO START OFF TO SEE IF YOU WERE  
9 FAMILIAR WITH THIS SPECIFIC DOCUMENT, AND THEN WE CAN GO FROM  
10 THERE. SO IT'S KIND OF ONE STEP AT A TIME.

11 THE WITNESS: OKAY. YES.

12 BY MR. VOSS:

13 Q IS IT CORRECT TO SAY THAT THIS DOCUMENT WAS  
14 RESPONDING TO ISSUES OF AN I.R.A.C. TECHNICAL PROPOSAL?

15 A YES.

16 Q OKAY. AND ON PAGE 2, EXHIBIT 214-2, AT ISSUE  
17 NUMBER 3.

18 A ISSUE NUMBER 3? OKAY. NUMBER 3.

19 Q WHERE IT SAYS, "LETTERS OF COMMITMENT FROM  
20 STAFF," REFERRING TO PAGE 28, PART 3, PROJECT PERSONNEL.

21 YOU SEE THAT PART THERE?

22 A (NO AUDIBLE RESPONSE.)

23 Q YOU SEE THAT SECTION, SIR?

24 A (NO AUDIBLE RESPONSE.)

25 Q MAY I ASK YOU A QUESTION ABOUT IT?

26 A ISSUE NUMBER 3?

1 Q YES.

2 A AND WHAT LINE?

3 THE COURT: WELL, HE JUST WANTS TO MAKE SURE THAT YOU  
4 SEE THAT ISSUE, AND THEN HE'LL FOLLOW UP WITH SOME MORE. HE  
5 JUST WANTS TO MAKE SURE WE'RE ALL LOOKING AT THE SAME PORTION  
6 OF PAGE NUMBER 2.

7 SO YOU SEE THAT, WHERE IT SAYS THE HEADING,  
8 "ISSUE NUMBER 3"? YOU SEE THAT?

9 THE WITNESS: YEAH, I SEE NUMBER 3.

10 THE COURT: OKAY. SO HE'LL ASK HIS NEXT QUESTION.  
11 BY MR. VOSS:

12 Q ISN'T IT CORRECT THAT, BY MEANS OF THIS  
13 DOCUMENT, I.R.A.C. REFERS TO YOU HERE AT ISSUE NUMBER 3 AS  
14 "DR. LE XUAN KHOA"?

15 A AND WHETHER THIS IS FROM STAFF OR FROM THE  
16 CONTRACT OFFICER, I HAVE NO IDEA, BECAUSE THAT'S NOT FROM ME.

17 Q IT'S AN I.R.A.C. DOCUMENT; RIGHT?

18 A IT'S NOT FROM ME ANYWAY.

19 Q IT IS AN I.R.A.C. DOCUMENT, IS IT NOT?

20 A IT'S AN I.R.A.C. DOCUMENT, YEAH.

21 Q OKAY. I NEXT DIRECT YOUR ATTENTION TO PAGE 5,  
22 EXHIBIT 214-5 ON THE BOTTOM.

23 A ISSUE NUMBER 5?

24 THE COURT: NO, PAGE NUMBER 5.

25 THE WITNESS: OH, PAGE NUMBER 5.

26 BY MR. VOSS:

1 Q SO ON THE VERY BOTTOM, IT SAYS EX 214 DASH, AND  
2 YOU'RE LOOKING FOR PAGE 5.

3 A YEAH, I HAVE PAGE NUMBER 5.

4 Q OKAY. AND THEN THE PARAGRAPH THAT BEGINS WITH  
5 THE NUMERAL 2, YOU SEE THAT PARAGRAPH ON THE PAGE?

6 A PAGE NUMBER 5, WHICH PARAGRAPH?

7 Q THE ONE STARTING WITH NUMERAL 2, NEAR THE TOP  
8 HALF.

9 A NUMBER 2, YEAH. NUMBER 2, "AS AGREED IN  
10 NEGOTIATIONS"; RIGHT?

11 Q YES.

12 A OKAY, YEAH. I SEE THAT NOW.

13 Q WHO ARE THE NEGOTIATIONS BETWEEN, AS REFERENCED  
14 THERE? WHAT DOES IT SAY?

15 A (NO AUDIBLE RESPONSE.)

16 Q LET ME HELP YOU.

17 IS IT CORRECT TO SAY IT SAYS, "AS AGREED IN  
18 NEGOTIATIONS BETWEEN DR. KHOA, I.R.A.C. DIRECTOR AND..." SOME  
19 OTHER PEOPLE?

20 A SAY THE SAME THING; NOT FROM ME ANYWAY.

21 Q BUT FROM I.R.A.C. --

22 A FROM I.R.A.C., YES.

23 Q -- THE NONPROFIT ORGANIZATION OF WHICH YOU'RE  
24 THE PRESIDENT.

25 AND IS IT FAIR TO SAY THAT WITH RESPECT TO ALL  
26 THE GRANTS AND TECHNICAL PROPOSALS, THAT YOU WERE ULTIMATELY

1 RESPONSIBLE FOR ALL OF THEM?

2 A YES.

3 MR. VOSS: MOVE THAT EXHIBIT NUMBER 214 BE RECEIVED  
4 INTO EVIDENCE.

5 MR. HART: I'M GOING TO OBJECT, YOUR HONOR. AGAIN,  
6 FOUNDATION. AND IT'S HEARSAY AND RELEVANCE.

7 THE COURT: OVERRULED. IT WILL BE ADMITTED.

8 (EXHIBIT 214 ADMITTED.)

9 MR. VOSS: NEXT, DIRECT YOUR ATTENTION TO EXHIBIT  
10 NUMBER 218. SO CHANGING EXHIBITS IN YOUR BOOKLET THERE, YOUR  
11 BINDER, IF YOU CAN SWITCH TO NUMBER 218.

12 THE COURT: MR. KHOA, IF YOU CAN TURN TO 218. 2-1-8.

13 THE WITNESS: THIS ONE?

14 THE COURT: KEEP GOING. PULL ALL THE PAGES OVER.

15 MR. HART: I'LL GET IT, JUDGE.

16 THE COURT: I THINK HE'S THERE, BUT JUST THE BINDERS  
17 WERE BLOCKING IT.

18 THE WITNESS: THIS IS THIS ONE?

19 THE COURT: YES.

20 MR. HART: 218.

21 THE WITNESS: THANK YOU, SIR.

22 BY MR. VOSS:

23 Q DO YOU SEE NUMBER 218, SIR?

24 A YES, I SEE IT. I HAVE IT NOW.

25 Q OKAY. AND IF YOU'LL TAKE A LOOK AT THAT  
26 DOCUMENT, IS IT CORRECT TO SAY THAT THIS IS A REQUEST FOR

1 GRANT MONEY FROM LOS ANGELES COUNTY THAT IS SUBMITTED BY  
2 I.R.A.C. IN 1984?

3 A YES.

4 Q OKAY. SO THEN TURNING YOUR ATTENTION TO  
5 EXHIBIT NUMBER 218-7, IF COULD YOU GO TO PAGE 7.

6 A YOU MEAN PAGE 7; RIGHT?

7 THE COURT: CORRECT, PAGE 7 OF THAT EXHIBIT.

8 THE WITNESS: YES, I HAVE PAGE 7.

9 BY MR. VOSS:

10 Q OKAY. AND BEFORE I ASK MORE QUESTIONS, YOU  
11 HAVE SEEN THIS DOCUMENT BEFORE; ISN'T THAT CORRECT?

12 A YES.

13 Q AND IT'S A TRUE AND CORRECT COPY OF THE GRANT  
14 APPLICATION BY I.R.A.C. SEEKING MONEY FROM LOS ANGELES COUNTY;  
15 ISN'T THAT CORRECT?

16 MR. HART: OBJECTION. FOUNDATION.

17 THE COURT: OVERRULED.

18 YOU MAY RESPOND, SIR.

19 THE WITNESS: THIS IS A PROPOSAL NEGOTIATED BETWEEN  
20 MY STAFF AND THE -- AND THE PROJECT --

21 THE COURT: WELL, MR. KHOA, LET ME STOP YOU RIGHT  
22 THERE.

23 THE QUESTION NOW IS MORE OF A BASIC  
24 FOUNDATIONAL ONE AS TO WHETHER OR NOT THIS DOCUMENT THAT  
25 YOU'RE LOOKING AT IS, TO YOUR KNOWLEDGE, A TRUE AND CORRECT  
26 COPY OF THE APPLICATION OR PROPOSAL THAT IT PURPORTS TO BE?

1 THE WITNESS: YES.

2 MR. VOSS: THROUGH PAGE 8, I SHOULD SAY.

3 THE COURT: THROUGH PAGE 8.

4 MR. VOSS: THERE MAY HAVE BEEN MORE.

5 THE COURT: SO IS THIS --

6 THE WITNESS: I'VE SEEN IT.

7 THE COURT: OKAY. WELL, THE QUESTION IS A LITTLE  
8 DIFFERENT.

9 THE WITNESS: THEN ASK THE QUESTION, PLEASE.

10 THE COURT: THE QUESTION IS A LITTLE DIFFERENT. IT'S  
11 WHETHER OR NOT THIS IS, TO YOUR KNOWLEDGE, A TRUE AND CORRECT  
12 COPY OF THE FIRST EIGHT PAGES THIS PROPOSAL PURPORTS TO BE?

13 BUT TAKE YOUR TIME. TAKE A GANDER. THAT'S THE  
14 ONLY QUESTION RIGHT NOW, IS WHETHER IT'S A TRUE AND CORRECT  
15 COPY, TO YOUR KNOWLEDGE.

16 MR. HART: HE WON'T UNDERSTAND THE WORD "GANDER,"  
17 JUDGE. TELL HIM TO LOOK AT IT.

18 THE COURT: PLEASE LOOK AT THE DOCUMENT. TAKE YOUR  
19 TIME.

20 AND THE QUESTION IS: WHETHER THIS IS A TRUE  
21 AND CORRECT COPY OF THE FIRST EIGHT PAGES OF THE PROPOSAL THAT  
22 IT PURPORTS TO BE?

23 THE WITNESS: SO WHAT'S THE FIRST EIGHT -- PUNITIVE  
24 DAMAGES?

25 THE COURT: NO, NOT DAMAGES.

26 THE WITNESS: OF THE PROPOSAL.

1 THE COURT: THE QUESTION IS WHETHER THIS DOCUMENT IS  
2 A TRUE AND CORRECT COPY OF THE FIRST EIGHT PAGES OF THIS  
3 PROPOSAL THAT IS TITLED ON THE FIRST PAGE?

4 THE WITNESS: SO MAYBE TYPING SOMETHING. NOT  
5 "DAMAGES." MAYBE JUST "PAGES"?

6 THE COURT: PAGES.

7 THE WITNESS: I SEE. IT SAID "DAMAGES."

8 SO, YEAH, RELATED TO THE EIGHT PAGES OF THE  
9 PROPOSAL.

10 BY MR. VOSS:

11 Q OKAY. SO DIRECTING YOUR ATTENTION TO PAGE  
12 NUMBER 7, SO 218-7 AT THE BOTTOM, IF YOU'LL FLIP TO THAT PAGE,  
13 PLEASE.

14 DO YOU SEE THAT THERE, SIR, AT THE BOTTOM,  
15 "PERSONNEL"?

16 A YES, I SEE THE BOTTOM OF THE PAGE 7 --

17 Q OKAY. AND IS IT CORRECT TO SAY --

18 A -- ON PERSONNEL.

19 Q IS IT CORRECT TO SAY THAT, IN CONNECTION WITH  
20 SEEKING GRANT MONEY -- I.R.A.C. SEEKING GRANT MONEY FROM  
21 L.A. COUNTY, THAT IN THE SECTION REGARDING PERSONNEL, YOU ARE  
22 DESIGNATED AS "DR. LE XUAN KHOA, I.R.A.C. EXECUTIVE DIRECTOR"?

23 A YES. THIS IS A DOCUMENT BETWEEN THE STAFF --  
24 S.E.A.R.A.C. STAFF AND THE FUNDER.

25 Q AND AS WE'VE ESTABLISHED, YOU'RE PERSONALLY  
26 RESPONSIBLE FOR ALL THE GRANTS THAT EVER WENT OUT FROM



1 I.R.A.C. DURING YOUR TENURE AS PRESIDENT; ISN'T THAT CORRECT?

2 A YES, AS PRESIDENT.

3 MR. VOSS: MOVE THAT 218 BE RECEIVED INTO EVIDENCE.

4 MR. HART: OBJECTION. FOUNDATION AND RELEVANCE.

5 THE COURT: OVERRULED. 218 WILL BE ADMITTED.

6 (EXHIBIT 218 ADMITTED.)

7 THE COURT: I'M GOING TO LOOK TO MY OWN 352. DO YOU

8 RECALL THE ANGEL STADIUM STATEMENT THAT I -- STORY I SHARED

9 EARLIER?

10 BY MR. VOSS:

11 Q IS IT FAIR TO SAY, SIR, THAT THERE ARE MANY

12 DOCUMENTS THAT YOU'VE SEEN DURING THE COURSE OF THIS

13 LITIGATION IN WHICH I.R.A.C. SOUGHT GRANT MONEY THAT

14 REFERENCED YOU AS "DR. KHOA"?

15 MR. HART: OBJECTION. ASSUMES FACTS NOT IN EVIDENCE.

16 THE COURT: OVERRULED.

17 YOU MAY RESPOND.

18 THE WITNESS: THE PROPOSAL REFER TO -- REFERENCE TO

19 ME AS "DR. KHOA" WAS NEGOTIATIONS BETWEEN STAFF AND -- AND THE

20 FUNDER. SO IT'S THE SAME QUESTION, THE SAME ANSWER. WE WASTE

21 TOO MUCH TIME.

22 BY MR. VOSS:

23 Q IN AN EFFORT TO NOT INTRODUCE EACH AND EVERY

24 DOCUMENT --

25 MR. HART: YOUR HONOR, I HAVE TO OBJECT TO THAT.

26 THAT'S AN IMPROPER COMMUNICATION TO THE JURY.

1 THE COURT: LET'S SIMPLY ASK THE QUESTION.

2 BY MR. VOSS:

3 Q IS IT CORRECT TO SAY THAT YOU HAVE SEEN, DURING  
4 THE COURSE OF THIS LITIGATION, AN I.R.A.C. DRAFT PROPOSAL TO  
5 GLENMEDE TRUST FOR MONEY?

6 A I THINK THAT THE NAME GLENMEDE TRUST IS  
7 FAMILIAR TO ME.

8 Q AND IS IT CORRECT TO SAY THAT I.R.A.C. SOUGHT  
9 MONEY FROM GLENMEDE AND HELD YOU OUT TO BE A DOCTOR?

10 A IT'S THE SAME QUESTION AND THE SAME ANSWER;  
11 THIS IS NOT FROM ME BUT FROM NEGOTIATIONS BETWEEN STAFF AND  
12 THE FUNDER.

13 Q SO DO YOU HAVE AN ESTIMATE AS TO HOW MANY GRANT  
14 PROPOSALS WERE PREPARED FOR I.R.A.C. SEEKING MONEY DURING THE  
15 TIME YOU WERE I.R.A.C.'S PRESIDENT?

16 A I CAN'T SAY HOW MANY.

17 Q MORE THAN 20?

18 A AROUND THAT NUMBER OR MAYBE LESS. I DON'T -- I  
19 CAN'T --

20 Q MORE THAN A DOZEN?

21 A I CAN'T CONFIRM. I CAN'T SAY EXACTLY THE  
22 NUMBER.

23 Q WELL, I'M NOT ASKING YOU TO COME UP WITH AN  
24 EXACT NUMBER. BUT AS YOUR BEST ESTIMATE, WOULD IT BE FAIR TO  
25 SAY THAT THERE WERE MANY GRANT PROPOSALS SUBMITTED BY I.R.A.C.  
26 SEEKING MONEY THAT REFERENCED YOU AS "DR. KHOA"?

1           A       YES.

2           Q       OKAY.  WHILE WE'RE LOOKING FOR THE NEXT  
3 EXHIBIT, DID YOU SIGN THE GRANT APPLICATIONS FOR I.R.A.C. AND  
4 S.E.A.R.A.C.?

5           A       YES, I SIGNED THE GRANT APPLICATION; MOST OF  
6 THE TIME I DID.

7           Q       IS IT CORRECT TO SAY THAT YOU ALWAYS SIGNED THE  
8 GRANT APPLICATIONS?

9           MR. HART:  OBJECTION.  ARGUMENTATIVE.

10          THE COURT:  OVERRULED.

11          THE WITNESS:  I THINK THAT'S ONE OR TWICE OR SOME  
12 MORE TIME IT'S SIGNED BY MY DEPUTY OR MY PROJECT DIRECTOR,  
13 BECAUSE IT'S -- IT'S KIND OF ROUTINE THING.  IT'S NOT A NEW  
14 PROPOSAL.

15          BY MR. VOSS:

16          Q       IS IT CORRECT TO SAY THAT YOU WERE ULTIMATELY  
17 RESPONSIBLE FOR THE GRANT APPLICATIONS SUBMITTED BY I.R.A.C.?

18          A       YES.

19          Q       IS IT CORRECT TO SAY THAT YOU SUPERVISED  
20 EVERYTHING WITH RESPECT TO GRANT APPLICATIONS BY I.R.A.C.?

21          MR. HART:  OBJECTION.  VAGUE.  AMBIGUOUS.

22          "EVERYTHING," WHAT IS "EVERYTHING"?

23          THE COURT:  WAIT.  WAIT.  WAIT.

24                   FIRST OF ALL, WE JUST NEED TO SAY, "OBJECTION.  
25 VAGUE."

26          MR. HART:  I'M SORRY, JUDGE.

1 THE COURT: WE DON'T NEED SPEAKING OBJECTIONS.

2 AND I WILL SUSTAIN. WE NEED A LITTLE CLEARER  
3 QUESTION ON THAT.

4 MR. VOSS: OKAY. YOUR HONOR, I'D LIKE TO READ FROM  
5 THE WITNESS' TESTIMONY IN HIS DEPOSITION.

6 THE COURT: PAGE AND LINE?

7 MR. VOSS: PAGE 22, LINE 19, THROUGH LINE 24 ON  
8 PAGE 23. THAT'S LINE 19, PAGE 22, THROUGH LINE 24 ON PAGE 23.

9 THE COURT: GIVE MR. HART AND MYSELF AN OPPORTUNITY  
10 TO REVIEW THOSE PAGES.

11 MR. HART: NO OBJECTION, YOUR HONOR.

12 THE COURT: YOU MAY READ THOSE DESIGNATED LINES.

13 MR. VOSS: COMMENCING LINE 19, PAGE 22. (AS READ:)

14 "QUESTION: AND ON THESE GRANT  
15 APPLICATIONS, OTHER PEOPLE WOULD HAVE  
16 IDEAS, BUT ULTIMATELY YOU WERE RESPONSIBLE  
17 FOR THE GRANT APPLICATIONS; IS THAT  
18 CORRECT?

19 "ANSWER: YEAH, I WRITE WITH THEM.  
20 WE CAN DIVIDE THE WORK.

21 "QUESTION: OKAY. BUT, ULTIMATELY,  
22 YOU WERE THE ONE --

23 "ANSWER: I SHOULD BE. IN GENERAL,  
24 I SUPERVISED EVERYTHING.

25 "QUESTION: OKAY. SO NO GRANT  
26 APPLICATION WENT OUT WITHOUT YOUR APPROVAL;

1 IS THAT CORRECT?

2 "ANSWER: UH-HUH, YEAH.

3 "QUESTION: AND DID YOU SIGN THE  
4 GRANT APPLICATIONS?

5 "ANSWER: YES. I ALWAYS SIGN IT.

6 "QUESTION: WERE THOSE SIGNATURES --  
7 DO YOU KNOW WHAT A PENALTY OF PERJURY IS?

8 "ANSWER: I ALWAYS SIGN AS EXECUTIVE  
9 DIRECTOR OR PRESIDENT.

10 "QUESTION: AND DID YOU?

11 "ANSWER: INITIALLY, EXECUTIVE  
12 DIRECTOR, BUT LATER ON SOME BOARD MEMBERS  
13 SUGGEST YOU USE THE WORD "PRESIDENT" SO  
14 THAT YOU CAN TALK TO OTHER GOVERNMENTS TOO.  
15 OKAY? YOU'RE IN A BETTER POSITION.

16 "QUESTION: DID YOU UNDERSTAND, WHEN  
17 YOU WERE SUBMITTING THESE GRANT  
18 APPLICATIONS, THAT THEY HAD TO BE ACCURATE?

19 "ANSWER: YES, I KNOW.

20 "QUESTION: YOU COULD NOT MAKE A  
21 MISREPRESENTATION ON A GRANT APPLICATION?

22 "ANSWER: I UNDERSTAND THAT."

23 (DONE READING.)

24 BY MR. VOSS:

25 Q MR. KHOA, WHEN YOU SUBMITTED THESE  
26 APPLICATIONS, IS IT CORRECT TO SAY YOU KNOW YOU DID SO UNDER

1 PENALTY OF PERJURY?

2 MR. HART: OBJECTION. FOUNDATION.

3 THE COURT: OVERRULED.

4 YOU MAY RESPOND, SIR.

5 THE WITNESS: WHAT'S THE RELATIONSHIP BETWEEN  
6 SUBMITTED APPLICATION AND UNDER PENALTY OF PERJURY? I DON'T  
7 UNDERSTAND IT.

8 BY MR. VOSS:

9 Q DO YOU UNDERSTAND WHAT PERJURY IS?

10 A YES, I UNDERSTAND WHAT PERJURY IS.

11 Q AND IF YOU COMMITTED PERJURY IN SUBMITTING A  
12 GRANT APPLICATION, YOU KNEW THAT WOULD BE UNLAWFUL; RIGHT?

13 A YES.

14 Q SO YOU KNEW YOUR GRANT APPLICATIONS HAD TO BE  
15 ACCURATE AND HAVE NO MISREPRESENTATIONS; CORRECT?

16 A YES.

17 Q AND WHEN YOU SIGNED THE GRANT APPLICATIONS AS  
18 THE EXECUTIVE DIRECTOR OR PRESIDENT, YOU UNDERSTOOD THAT YOU  
19 DID SO UNDER THE PENALTY OF PERJURY; RIGHT?

20 A I SIGN IT BECAUSE I -- I DON'T THINK THAT I  
21 SIGN IT -- THAT IS A VIOLATION, BECAUSE DOCTOR OR PROFESSOR  
22 WAS -- I ALREADY SAID MANY TIMES THAT I CONSIDER THAT AS  
23 NORMAL ALREADY. I DON'T HAVE TO CORRECT IT. SO I CAN SIGN  
24 IT -- BUT I NEVER SIGN IT UNDER PH.D. OR DOCTOR. THAT'S IT.  
25 I NEVER SIGN IT THAT WAY. SO I DON'T THINK THAT IS  
26 SOMETHING -- ANYTHING LIKE PERJURY IN HERE.

1 MR. VOSS: MOVE TO STRIKE AS NONRESPONSIVE.

2 THE COURT: ONE MOMENT.

3 MR. HART: I WOULD DISAGREE, YOUR HONOR.

4 THE COURT: ONE MOMENT.

5 THE WITNESS: CAN YOU SHOW ME A DOCUMENT --

6 THE COURT: WAIT. WAIT. WAIT.

7 OVERRULED.

8 BY MR. VOSS:

9 Q DR. KHOA, YOU DID UNDERSTAND THAT THE ENTIRE  
10 DOCUMENT THAT YOU SIGNED AND SUBMITTED, WHEN YOU SIGNED IT,  
11 YOU WERE CERTIFYING THE TRUTHFULNESS OF THAT DOCUMENT; RIGHT?

12 A YEAH, THE TRUTHFULNESS IN THE CONTENT OF THE  
13 DOCUMENT.

14 Q OKAY. AND THAT IF THERE WAS SOMETHING  
15 UNTRUTHFUL, THAT WOULD BE PERJURY?

16 MR. HART: OBJECTION. THAT'S ASSERTING A LEGAL  
17 CONCLUSION.

18 THE COURT: SUSTAINED.

19 I THINK WE'VE KIND OF PLOWED THIS ROW MANY A  
20 TIME.

21 MR. VOSS: NEXT, DIRECT THE WITNESS' ATTENTION TO  
22 EXHIBIT NUMBER 221, WHICH HAS ALREADY BEEN RECEIVED INTO  
23 EVIDENCE.

24 THE COURT: MR. KHOA, THE VERY LAST EXHIBIT IN THAT  
25 BINDER SHOULD BE EXHIBIT --

26 THE WITNESS: 221?

1 THE COURT: 2-2-1. CORRECT.

2 THE WITNESS: THIS ONE?

3 THE COURT: YOU MAY APPROACH, MR. HART.

4 BY MR. VOSS:

5 Q YOU RECOGNIZE THIS DOCUMENT? WE TALKED ABOUT  
6 IT EARLIER IN THE TRIAL.

7 A YES.

8 Q DIRECT YOUR ATTENTION TO PAGE 4, EXHIBIT 221-4.

9 A YES, I HAVE PAGE 4 HERE.

10 Q SO YOUR RESUME APPEARS IN THIS GRANT  
11 APPLICATION STARTING AT PAGE 5; ISN'T THAT CORRECT?

12 A YES.

13 Q AND ON EXHIBIT 221-4, THAT'S A LETTER FROM  
14 DENNIS GALLAGHER, THE EXECUTIVE DIRECTOR OF THE REFUGEE POLICY  
15 GROUP; ISN'T THAT CORRECT?

16 A YES, THAT'S CORRECT.

17 Q AND ISN'T IT ALSO CORRECT MR. GALLAGHER  
18 ADDRESSES HIS LETTER TO YOU AS "DR. LE XUAN KHOA"?

19 A YES, HE ADDRESS ME AS "DR. KHOA," AND ALSO THIS  
20 IS FROM MR. GALLAGHER.

21 Q AND THEN WHEN THE GRANT APPLICATION WAS  
22 PREPARED, THAT YOU SUPERVISED EVERYTHING, YOUR WORDS, YOU  
23 CHOSE TO INCLUDE THIS LETTER IN SEEKING MONEY FROM THE  
24 U.S. GOVERNMENT, RIGHT, AS PART OF THE GRANT APPLICATION?

25 A YEAH, I -- I THINK THAT I HAVE ANSWERED THIS  
26 QUESTION SEVERAL TIMES.



1 Q MY QUESTION IS: DID YOU CHOOSE TO INCLUDE THIS  
2 LETTER AS PART OF THE GRANT APPLICATION; YES OR NO?

3 A I DIDN'T CHOOSE TO INCLUDE IT. I DON'T KNOW  
4 EVEN IF -- IF SOMEBODY OFFER OPERATION WITH S.E.A.R.A.C.,  
5 THAT'S FINE, BUT I DIDN'T PAY ATTENTION WHETHER "DOCTOR" IS OR  
6 NOT "DOCTOR" IN HERE.

7 Q SO WHEN I READ YOUR EARLIER TESTIMONY, "SO NO  
8 GRANT APPLICATION WENT OUT WITH YOUR APPROVAL; IS THAT  
9 CORRECT?" AND YOUR IS, "UH-HUH, YEAH," THIS WAS A GRANT  
10 APPLICATION AND HAD YOUR APPROVAL; RIGHT?

11 A YES, AS A MATTER OF A ROUTINE.

12 Q OKAY. AND WHEN YOU SAID, "I SUPERVISE  
13 EVERYTHING," YOUR WORDS, THAT WOULD INCLUDE WHATEVER'S  
14 INCLUDED IN THE GRANT APPLICATION; RIGHT?

15 A YES.

16 Q OKAY. SO THEN WE GO TO YOUR RESUME, WHICH IS  
17 ON 221-5, THE NEXT PAGE OF THE EXHIBIT.

18 MR. HART: WE WANT TO PUBLISH THIS SO THE JURY CAN  
19 FOLLOW ALONG?

20 THE COURT: WE'LL SEE IF MR. VOSS WISHES TO AS PART  
21 OF HIS QUESTIONING.

22 MR. VOSS, WOULD YOU LIKE --

23 MR. VOSS: SURE. WHY DON'T WE START -- SINCE WE'RE  
24 GOING TO DO SOME PUBLICATION, WHY DON'T WE SHOW THE JURY  
25 221-4.

26 THE COURT: THAT MAY BE PUBLISHED. IT'S BEEN

1 ADMITTED PREVIOUSLY.

2 THE LETTER BEFORE, PAGE 4, EXHIBIT 221.

3 (DOCUMENT PUBLISHED.)

4 THE COURT: WE'VE ALREADY EXPLAINED TO MEMBERS OF THE  
5 JURY THAT THEY WILL HAVE -- BE ABLE TO SEE ALL THE EXHIBITS  
6 THAT HAVE BEEN ADMITTED DURING THEIR DELIBERATIONS.

7 MR. VOSS: SO EVEN IF I DON'T SHOW IT ON THE BOARD.

8 BY MR. VOSS:

9 Q OKAY. SO THIS IS THE LETTER I WAS JUST ASKING  
10 YOU QUESTIONS ABOUT, SIR.

11 AND DO YOU RECOGNIZE THAT YOU INCLUDED THIS  
12 DOCUMENT ADDRESSED TO YOU AS "DR. LE XUAN KHOA," AND SAYING TO  
13 YOU, "DEAR, DR. KHOA"?

14 MR. HART: OBJECTION. MISCHARACTERIZES THE  
15 TESTIMONY.

16 THE COURT: SUSTAINED.

17 BY MR. VOSS:

18 Q DO YOU RECOGNIZE THIS LETTER?

19 A IS THAT LETTER FROM MR. GALLAGHER?

20 Q YES.

21 A YES.

22 Q OKAY. SO THEN TURNING TO PAGE 221-7.

23 THE COURT: THAT MAY BE PUBLISHED AS WELL.

24 (DOCUMENT PUBLISHED.)

25 BY MR. VOSS:

26 Q SO THE FOCUS OF OUR NEXT SEVERAL QUESTIONS IS

1 GOING TO BE THE FIRST PARAGRAPH AFTER THE HEADING OF  
2 "EDUCATION."

3 DO YOU SEE THAT THERE?

4 A I ANSWERED THIS QUESTION SEVERAL TIME BEFORE,  
5 ABOUT THE LEVEL OF THE EDUCATION.

6 THE COURT: MR. KHOA, WAIT. THE QUESTION RIGHT NOW  
7 IS JUST SIMPLY: DO YOU SEE THE HEADING "EDUCATION" ON THAT  
8 PAGE IN FRONT OF YOU?

9 THE WITNESS: YES, I SEE THAT.

10 BY MR. VOSS:

11 Q SO IT REFERS TO A DOCTORAL THESIS ENTITLED  
12 "PHILOSOPHY OF DHYANA ZEN," AND IT GIVES A DATE OF 1960.

13 YOU SEE THAT THERE?

14 A YES.

15 Q SO IS IT ACCURATE TO SAY THAT THERE WAS A  
16 DOCTORAL THESIS ENTITLED "THE PHILOSOPHY OF DHYANA ZEN  
17 BUDDHISM" AS OF 1960?

18 A THERE WAS A DOCTORAL THESIS REGISTERED.

19 Q I'M SORRY. I DIDN'T CATCH THE LAST WORD.

20 A REGISTERED AT THE UNIVERSITY OF PARIS UNDER  
21 THIS TITLE.

22 THE COURT: ARE YOU SAYING "REGISTERED" AT THE  
23 UNIVERSITY?

24 THE WITNESS: YEAH.

25 BY MR. VOSS:

26 Q OKAY. SO IS THERE ANY STATEMENT ON THE RESUME

1 ABOUT IT BEING REGISTERED IN 1960?

2 A THE RESUME IS REFERRING TO THE LEVEL OF  
3 EDUCATION.

4 Q DOES IT SAY THAT IT WAS ONLY REGISTERED IN  
5 1960? IT DOESN'T, DOES IT?

6 A IT DOESN'T, YEAH. BUT I THINK THAT I WANT TO  
7 CLARIFY THAT, TO BE CLEAR.

8 Q YOU KNOW THAT. THAT WAS WHAT YOUR KNOWLEDGE  
9 WAS. BUT HOW -- OR CAN YOU SHOW ME WHERE ON THE PIECE OF  
10 PAPER THAT SOMEONE WHO IS READING ABOUT YOU FOR THE FIRST TIME  
11 CAN FIND OUT THAT, OH, NO, WE DIDN'T FINISH THE DOCTORAL  
12 THESIS. IT WAS JUST REGISTERED IN 1960? DOES IT SHOW THAT  
13 ANYWHERE?

14 A (NO AUDIBLE RESPONSE.)

15 Q IT DOESN'T, DOES IT?

16 A THAT'S A BIG DEAL TO ME, SO THAT --

17 Q IS THERE ANYWHERE IN YOUR RESUME WHERE YOU SAY,  
18 OH, THE THESIS IS INCOMPLETE?

19 A (NO AUDIBLE RESPONSE.)

20 Q THERE ISN'T, IS THERE?

21 A I DON'T THINK I NEED TO SPECIFY THAT IT IS  
22 INCOMPLETE OR NOT.

23 Q IS THERE ANYWHERE ON THERE WHERE IT INDICATES  
24 THAT YOU'RE MERELY A CANDIDATE FOR A DOCTORAL DEGREE?

25 A YEAH, IF I PUT "CANDIDATE," IS IT BETTER, BUT I  
26 DON'T SEE THE NEED TO SPECIFY IT. IT'S JUST THE LEVEL OF

1 EDUCATION.

2 Q IT WOULD BE BETTER, IT WOULD BE MORE ACCURATE,  
3 IF YOU HAD SAID HERE, "THIS IS INCOMPLETE," WOULDN'T IT?

4 A YES. BUT WHETHER IT'S NECESSARY IS ONE MORE  
5 THING.

6 Q THERE'S NOTHING --

7 A I DON'T THINK IT'S NECESSARY.

8 Q THERE'S NOTHING REFLECTED ANYWHERE IN THE GRANT  
9 APPLICATION ABOUT YOU LOSING YOUR LUGGAGE IN 1975, IS THERE?

10 A NOTHING RELATED TO MY LOSING MY LUGGAGE.

11 Q THERE'S, IN FACT, NO WAY FOR ANYONE READING THE  
12 RESUME YOU SUBMITTED WITH GRANT APPLICATIONS TO THE FEDERAL  
13 GOVERNMENT SEEKING MONEY TO KNOW THAT THAT DOCTORAL THESIS  
14 REFLECTED THERE WAS NEVER COMPLETED?

15 MR. HART: OBJECTION. ARGUMENTATIVE.

16 THE COURT: OVERRULED.

17 YOU MAY RESPOND, SIR.

18 THE WITNESS: I DON'T THINK I NEED TO SAY THAT I -- I  
19 NEED TO SUBMIT WITH THE GRANT APPLICATION -- THAT I NEED TO  
20 SPECIFY THAT I HAVE NEVER -- I HAVE NOT COMPLETED THE THESIS.

21 BY MR. VOSS:

22 Q WELL, IT DOESN'T SAY ANYTHING AT ALL ABOUT NOT  
23 COMPLETING IT ANYWHERE, DOES IT?

24 A NO.

25 Q AND IT WOULD BE BETTER IF IT HAD, SO THAT THERE  
26 WAS NO QUESTION IN THE READER'S MIND AS TO THE ACCURATE STATUS

1 OF YOUR DOCTORAL DEGREE; ISN'T THAT CORRECT?

2 A I THINK, IN THE MIND OF THE READER, THEY JUST  
3 WANT TO KNOW WHAT KIND OF EDUCATION I HAVE. THAT MEANS THE  
4 LEVEL OF EDUCATION.

5 Q OKAY. AND IN THE MIND OF THE READER, WOULDN'T  
6 YOU AGREE THAT THAT MISCHARACTERIZES WHETHER OR NOT YOU HAD  
7 COMPLETED YOUR DOCTORAL THESIS?

8 MR. HART: OBJECTION. CALLS FOR SPECULATION.

9 THE WITNESS: AND ESPECIALLY WHEN THE --

10 THE COURT: OVERRULED.

11 THE WITNESS: -- THE REQUIREMENT IS NOT REQUIRED THAT  
12 I MUST HAVE A PH.D. OR A DOCTOR DEGREE TO QUALIFY FOR THE  
13 GRANT. THAT'S NOT THE REQUIREMENT.

14 BY MR. VOSS:

15 Q THAT'S NOT MY QUESTION, SIR. THAT'S NOT MY  
16 QUESTION. THIS ISN'T AN ISSUE ABOUT WHETHER YOU'RE REQUIRED  
17 TO HAVE SOMETHING.

18 THE QUESTION IS: DOES THIS MISCHARACTERIZE, IN  
19 THE MIND OF SOMEBODY WHO MIGHT LOOK AT THIS, AND LEAD THEM TO  
20 THINK THAT YOU HAD YOUR DOCTORAL DEGREE WHEN YOU DIDN'T?

21 MR. HART: OBJECTION. SPECULATION.

22 THE COURT: OVERRULED.

23 YOU MAY RESPOND, SIR.

24 THE WITNESS: I DON'T THINK THAT THIS IS A  
25 MISREPRESENTATION.

26 BY MR. VOSS:

1 Q DOESN'T IT LEAD SOMEONE TO BELIEVE THAT YOUR  
2 DOCTORAL THESIS IS COMPLETED, 1960?

3 A SOMEBODY MIGHT THINK SO, BUT SOMEBODY WOULD NOT  
4 THINK THAT.

5 Q IT WOULD BE BETTER IF IT CHARACTERIZED IT AS  
6 INCOMPLETE, LOST, IN PROCESS, YOU NAME IT, BUT ANYTHING OTHER  
7 THAN SUGGESTING IT WAS COMPLETE; RIGHT?

8 WITHDRAWN. IT'S COMPOUND. I WITHDRAW MY OWN  
9 QUESTION.

10 THE COURT: ASKED AND ANSWERED AS WELL.  
11 BY MR. VOSS:

12 Q SO, MR. KHOA, WHEN CONGRESSMAN DORNAN, IN  
13 APRIL OF 1996, AFTER HIS STAFF INVESTIGATION, EXPRESSED  
14 CONCERN NUMBER 5, THAT "HIS," YOUR, "MISREPRESENTATION OF  
15 ACADEMIC CREDENTIALS MAY HAVE RESULTED IN STATE DEPARTMENT  
16 GRANTS -- IN HIS RECEIVING STATE DEPARTMENT GRANTS OVER  
17 COMPETING APPLICANTS," DID YOU UNDERSTAND THAT THAT WAS WHAT  
18 IT WAS ADDRESSED TO; THAT YOU DIDN'T HAVE YOUR DOCTORAL  
19 DEGREE?

20 MR. HART: OBJECTION. THE QUESTION MISSTATES THE  
21 DORNAN LETTER.

22 THE COURT: CALLS FOR SPECULATION AS WELL.  
23 BY MR. VOSS:

24 Q HOWEVER, THE CONGRESSMAN'S LETTER SAYS -- AND,  
25 AGAIN, JUST SO EVERYBODY REMEMBERS -- "HE RECENTLY ADMITTED HE  
26 DOES NOT HAVE SUCH A DEGREE. HIS MISREPRESENTATION OF

1 ACADEMIC CREDENTIALS MAY HAVE RESULTED IN HIS RECEIVING STATE  
2 DEPARTMENT GRANTS OVER COMPETING APPLICANTS."

3 IT WAS IMPORTANT THIS BE ACCURATE, WASN'T IT?

4 A OKAY. ONE THING, THIS IS SPECULATION FROM THE  
5 STAFF OF MR. -- OF CONGRESSMAN DORNAN.

6 NUMBER 2 IS THAT IT'S FALSE TO SAY THAT  
7 I -- THAT I ADMITTED RECENTLY, ADMITTED THAT I DON'T HAVE A  
8 DEGREE. I NEVER ADMITTED THAT.

9 Q BUT YOU AGREE WITH ME -- YOU SAID SO -- IT  
10 WOULD HAVE BEEN BETTER IF THERE HAD BEEN SOME REFERENCE FOR  
11 THE READER TO KNOW IT WAS INCOMPLETE; RIGHT?

12 A IT WOULD HAVE BEEN BETTER, BUT IT'S NOT  
13 NECESSARY.

14 MR. VOSS: YOUR HONOR, WE'RE APPROACHING THE LUNCH  
15 HOUR. SHOULD WE --

16 THE COURT: WELL, ARE WE --

17 MR. VOSS: I MEAN, I WILL BE SWITCHING GEARS.

18 THE COURT: WELL, AND WE CAN HAVE A LITTLE  
19 CONVERSATION.

20 LADIES AND GENTLEMEN, WE WILL TAKE OUR LUNCH  
21 BREAK, TO TRY AND TAKE CARE OF A COUPLE QUICK THINGS HERE  
22 BEFORE LUNCH.

23 SO WE WILL BE ON THAT RECESS. AGAIN, NO  
24 FORMING ANY OPINIONS, DOING ANY RESEARCH, DISCUSSING THE  
25 MATTER. HOPEFULLY, IT'S A BEAUTIFUL DAY OUT THERE. AND WE'LL  
26 SEE YOU-ALL AT 1:30. THANK YOU VERY KINDLY.



1 (JURY EXCUSED FOR LUNCH.)

2 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT OUTSIDE THE

3 PRESENCE OF THE JURY:)

4 THE COURT: WE ARE OUTSIDE THE PRESENCE OF THE JURY.

5 WE MAY WANT TO START READING THE JURY. I THINK

6 THEIR EYES ARE GOING TO GLOSS OVER. THEY'RE LOOKING AT THEIR

7 WATCHES. THEY'RE LOOKING AT ANYTHING AND EVERYTHING ELSE. I

8 THINK WE'VE --

9 MR. VOSS: I APPRECIATE THE --

10 THE COURT: -- LOOKED -- AND THIS IS APPLIES TO

11 EVERYBODY. THE HORSE HAS BEEN PUNISHED QUITE A BIT. I GUESS

12 I'LL PUT IT THAT WAY. AND I'M NOT SAYING YOU DON'T HAVE MORE

13 TO COVER, BUT SOME OF THESE THINGS HAVE BEEN DONE MANY A TIME.

14 MR. VOSS: WE WERE MORE PRODUCTIVE IN THAT HOUR THAN

15 I EXPECTED, FIRST OF ALL.

16 AND SECOND OF ALL, THE COURT'S COLLOQUY TO

17 BASEBALL WAS ALSO TAKEN WITH RESPECT TO INTRODUCING THE OTHER

18 EXHIBITS.

19 THE COURT: APPRECIATE THAT. AND I'M JUST REFERRING

20 TO WATCH THE EXHIBITS. THIS APPLIES ACROSS THE BOARD TO

21 EVERYBODY. READ YOUR AUDIENCE, I GUESS I WOULD SAY. SO YOU

22 HAVE THE POINTS YOU HAVE TO MAKE, AND I FULLY UNDERSTAND THAT,

23 BUT WE DON'T HAVE TO MAKE SOME POINTS SEVEN, EIGHT, NINE,

24 TIMES BETWEEN EVERYBODY'S EXAMINATION OF EVERYTHING.

25 MR. VOSS: THANK YOU, YOUR HONOR.

26 THE COURT: ALL RIGHT. ANYTHING ELSE BEFORE WE TAKE

1 THAT LUNCH RECESS?

2 MR. NGUYEN: YOUR HONOR, I HAVE TO GIVE NOTICE. I  
3 WON'T BE HERE IN THE AFTERNOON. I HAVE AN ASSIGNMENT WITH THE  
4 D.A., SO I APOLOGIZE.

5 THE COURT: THANK YOU VERY MUCH. GOOD LUCK TO YOU.  
6 BEST OF LUCK TO YOU.

7 I'M SURE MR. HART'S GOING TO JUMP IN AND BE ALL  
8 OVER THAT COMPUTER.

9 WE CAN GO AHEAD AND GO OFF THE RECORD.

10 (LUNCH RECESS.)

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1 SANTA ANA, CALIFORNIA - WEDNESDAY, NOVEMBER 13, 2024

2 AFTERNOON SESSION

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4 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT:)

5 THE COURT: LET'S GO AHEAD AND GO ON THE RECORD IN  
6 THE KHOA V. THANG MATTER. WE HAVE COUNSEL PRESENT.

7 MR. NGUYEN HAS INDICATED HE HAS TO STEP OUT  
8 THIS AFTERNOON. HE HAD SOMETHING GOING ON. MR. NGUYEN  
9 FROM -- THE CERTIFIED LAW STUDENT, IS NOT PRESENT, BUT  
10 OTHERWISE, WE HAVE ALL OTHER COUNSEL AND PARTIES AS STATED  
11 EARLIER THIS MORNING.

12 DO WE HAVE ALL OF OUR JURORS?

13 COURT ATTENDANT: WE DO, YOUR HONOR.

14 THE COURT: PERFECT. LET'S BRING THEM ALL IN.

15 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT IN THE  
16 PRESENCE OF THE JURY:)

17 THE COURT: ALL RIGHT. WE HAVE BEEN REJOINED BY ALL  
18 OF OUR JURORS, AND WE ARE GOING TO PICK UP HERE WITH MR. VOSS  
19 QUESTIONING.

20 MR. VOSS: THAT'S CORRECT.

21 THE COURT: ALL RIGHT. I'LL LET YOU DIVE IN THERE.

22 CROSS-EXAMINATION RESUMED

23 BY MR. VOSS:

24 Q MR. KHOA, IS IT FAIR TO SAY THAT THE GRANT  
25 APPLICATIONS THAT WE'VE BEEN DISCUSSING HERE WERE SUBMITTED BY  
26 I.R.A.C. AND/OR S.E.A.R.A.C. FOR THE PURPOSE OF OBTAINING

1 FUNDING FOR WORK TO BENEFIT THE VIETNAMESE REFUGEES?

2 A YES.

3 Q OKAY. IS IT ALSO CORRECT THAT THE WORK FOR  
4 WHICH FUNDING WAS BEING REQUESTED BY I.R.A.C. AND  
5 S.E.A.R.A.C. WAS FOR THE BENEFIT OF THE SAME PEOPLE, THE  
6 VIETNAMESE REFUGEES OR BOAT PEOPLE, THAT WOULD BENEFIT FROM  
7 THE R.O.V.R. PROGRAM?

8 A YEAH, BUT IT'S TWO DIFFERENT KINDS. ONE FOR  
9 THE R.O.V.R.; THAT MEANS PEOPLE RETURNING TO VIETNAM AND THE  
10 PEOPLE IN THE U.S. SO THAT'S TWO DIFFERENT PROGRAMS.

11 Q AND SOME OF YOUR GRANT APPLICATION REQUESTS  
12 WERE RELATED TO R.O.V.R.; CORRECT?

13 A YES.

14 Q OKAY. AND, IN FACT, IT IS THIS  
15 R.O.V.R. PROGRAM THAT WAS DISCUSSED IN YOUR ARTICLES IN 2020  
16 AND THE ARTICLE PUBLISHED BY THE DEFENDANTS IN RESPONSE TO  
17 YOUR ARTICLES ALSO IN 2020?

18 A YES.

19 Q SAME PROGRAM, IT'S ALL ABOUT R.O.V.R.; RIGHT?

20 A SAME PROGRAM.

21 Q OKAY. IS IT CORRECT TO SAY --

22 A FOR VIETNAM.

23 Q YEAH, FOR VIETNAMESE REFUGEES; RIGHT?

24 A FOR VIETNAM REFUGEES, YES.

25 Q I THINK THERE'S A LITTLE DELAY ON THE TECH.

26 A I'M SORRY.

1 Q IS IT CORRECT TO SAY THAT THE STATEMENT FOR  
2 WHICH YOU ARE SUING WAS MADE IN THE CONTEXT OF THE DEBATE  
3 SURROUNDING THE ADOPTION OF THE R.O.V.R. PROGRAM?

4 A YES.

5 MR. HART: OBJECTION.

6 THE COURT: WAIT. WAIT.

7 MR. HART: LACK OF FOUNDATION.

8 THE COURT: I WAS WAITING TO SEE -- THERE WAS A  
9 PAUSE.

10 MR. HART: I DIDN'T HAVE --

11 THE WITNESS: ACTUALLY, THIS --

12 THE COURT: WAIT. WAIT JUST A MOMENT.

13 THAT OBJECTION WILL BE OVERRULED.

14 NOW YOU MAY GO AHEAD AND RESPOND, MR. KHOA.

15 THE WITNESS: IT SHOULD BE CORRECT TO SAY THAT THE  
16 DEBATE SURROUNDING NOT THE R.O.V.R., BUT ACTUALLY ABOUT THE  
17 FORMATION OF R.O.V.R., BUT NOT THE R.O.V.R. PROGRAM ITSELF IN  
18 VIETNAM. SO TO BE FAIRLY ACCURATE.

19 MR. VOSS: YOUR HONOR, AT THIS TIME, WE HAVE NOTHING  
20 FURTHER ON CROSS.

21 THE COURT: THEN WE WILL TURN BACK TO MR. HART FOR  
22 HIS REDIRECT.

23 REDIRECT EXAMINATION

24 BY MR. HART:

25 Q PROFESSOR, CAN YOU TURN TO EXHIBIT 17, PLEASE.

26 THE COURT: YOU MAY APPROACH, IF YOU'D LIKE,

1 MR. HART.

2 MR. HART: HE SEEMS TO BE MANAGING NOW.

3 THE WITNESS: 17, YES.

4 MR. HART: RIGHT.

5 BY MR. HART:

6 Q DO YOU RECOGNIZE WHAT EXHIBIT 17 IS?

7 A YES.

8 Q TELL US WHAT THAT IS.

9 A THIS IS -- YEAH, ABOUT THE ARTICLE THAT  
10 DR. THANG WROTE ON THE MAY -- I'M SORRY, THE BREAKING NEWS ON  
11 DECEMBER 25, 2019. THAT WAS CHRISTMASTIME.

12 Q OKAY. WHAT YOU SEE IN EXHIBIT 17, WAS THAT  
13 PUBLISHED ON MACH SONG MEDIA?

14 A YEAH, THIS IS IN ENGLISH TRANSLATION. THE  
15 TITLE, RIGHT: "LITTLE IS KNOWN ABOUT THE PROGRAM THAT HAS  
16 SETTLED 20,000 FORMER VIETNAMESE BOAT PEOPLE INTO THE U.S."

17 MR. VOSS: OBJECTION. NONRESPONSIVE. MOVE TO  
18 STRIKE.

19 THE COURT: OVERRULED.

20 BY MR. HART:

21 Q IS THIS THE MACH SONG MEDIA POSTING THAT HAS  
22 THE CONGRESSMAN SMITH VIDEO LINK ATTACHED?

23 A YES, THIS IS THE ONE.

24 Q AND SO IF YOU GO ON MACH SONG MEDIA AND LOOK  
25 FOR THIS POSTING, YOU CAN GET THE LINK AND WATCH THE VIDEO OF  
26 CONGRESSMAN SMITH; CORRECT?

1 A YES, THAT'S CORRECT.

2 Q AND IS THAT WHAT YOU DID?

3 A AND ALSO THE CAPTION BY DR. THANG.

4 Q RIGHT.

5 AND SO SOME TIME AFTER DECEMBER 25TH OF 2019,  
6 DID YOU GO ON MACH SONG MEDIA AND LOOK AT THE VIDEO?

7 A YES, I DID.

8 Q ALL RIGHT. AND DO YOU RECOGNIZE THE PAGE THAT  
9 APPEARED NEXT TO THE LINK ON MACH SONG MEDIA?

10 MR. VOSS: OBJECTION. VAGUE.

11 THE COURT: OVERRULED.

12 THE WITNESS: THERE WAS ONLY ONE PAGE, PAGE  
13 17 -- 17-2.

14 MR. HART: RIGHT.

15 BY MR. HART:

16 Q SO YOU HAVE, IN EXHIBIT 17, A VIETNAMESE  
17 VERSION AND AN ENGLISH TRANSLATION; CORRECT?

18 A VIETNAMESE VERSION, YES, AND AN ENGLISH  
19 TRANSLATION.

20 Q OKAY. DO YOU RECOGNIZE THOSE FROM WHEN YOU  
21 WENT ONLINE TO LOOK AT THAT?

22 A ONLINE THERE WAS -- ON B.P.S.O.S., THERE WAS  
23 ONLY A VIETNAMESE VERSION.

24 Q RIGHT. AND YOU CAN SEE THAT ON PAGE 1;  
25 CORRECT?

26 A YEAH, THAT'S THE ONLY VERSION.

1 Q OKAY. DOES THIS EXHIBIT 17, PAGE 1, APPEAR TO  
2 BE A TRUE AND CORRECT COPY OF WHAT YOU SAW ON MACH SONG MEDIA  
3 WHEN YOU WENT TO LOOK AT THE VIDEO?

4 MR. VOSS: OBJECTION. RELEVANCE, YOUR HONOR.

5 THE COURT: OVERRULED.

6 THE WITNESS: YES.

7 BY MR. HART:

8 Q AND IN THIS PAGE 1, DO WE SEE COMMENTS ABOUT  
9 THE VIDEO FROM THE DEFENDANT, NGUYEN DINH THANG?

10 MR. VOSS: OBJECTION, YOUR HONOR.

11 THE WITNESS: YEAH, THIS IS THE CAPTION.

12 THE COURT: MR. KHOA, ONE MOMENT.

13 MR. VOSS: OBJECTION. RELEVANCE. ENGLISH VERSION IS  
14 STIPULATED.

15 MR. HART: ARE YOU TELLING ME YOU'VE STIPULATED THE  
16 ENGLISH VERSION INTO EVIDENCE?

17 MR. VOSS: MAY WE APPROACH, YOUR HONOR?

18 THE COURT: QUICKLY. I'M CONFUSED BY THE OBJECTION.  
19 I'M NOT SURE.

20 ONE MOMENT, LADIES AND GENTLEMEN.

21 (SIDEBAR. NO REPORTER.)

22 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT IN THE  
23 PRESENCE OF THE JURY:)

24 THE COURT: THANK YOU VERY MUCH, LADIES AND  
25 GENTLEMEN.

26 YOU MAY CONTINUE, MR. HART.



1 MR. HART: THANK YOU, YOUR HONOR. FOR THE RECORD, I  
2 THINK WE'VE STIPULATED EXHIBIT 17 INTO EVIDENCE.

3 MR. VOSS: WE AGREE WITH THAT STIPULATION, YOUR  
4 HONOR.

5 THE COURT: SO EXHIBIT 17 WILL BE ADMITTED INTO  
6 EVIDENCE AT THIS POINT IN TIME.

7 (EXHIBIT 17 ADMITTED.)

8 ALL COUNSEL: THANK YOU, YOUR HONOR.

9 BY MR. HART:

10 Q PROFESSOR, ON PAGE 17.2, WE HAVE THE ENGLISH  
11 VERSION OF THE HEADING FROM MACH SONG MEDIA, DECEMBER 25TH,  
12 2019, WHERE THE LINK TO THE CONGRESSMAN SMITH VIDEO WAS.

13 DO YOU SEE THAT?

14 A YES, I SEE, YEAH, BOTH THE HEADING, THE TITLE,  
15 AND THE LINK TO THE VIDEO.

16 Q RIGHT.

17 AND SO PEOPLE WHO WENT TO MACH SONG MEDIA TO  
18 VIEW THE VIDEO WOULD ALSO SEE COMMENTS BY DR. THANG, WOULDN'T  
19 THEY?

20 A YES, CORRECT.

21 Q ALL RIGHT. AND IN THESE COMMENTS ON PAGE 2 OF  
22 EXHIBIT 17, ARE COMMENTS ABOUT RESETTLING 20,000 FORMER BOAT  
23 PEOPLE, 18,000 FORMER BOAT PEOPLE.

24 DO YOU SEE THAT?

25 A YES, I SEE THAT.

26 Q NOW, YOUR NAME IS NOT MENTIONED ON THIS PAGE,

1 IS IT?

2 A NO, IT'S NOT MENTIONED, MY NAME.

3 Q BUT YOUR WORK IS MENTIONED, ISN'T IT?

4 A (NO AUDIBLE RESPONSE.)

5 Q I'LL REPHRASE.

6 A IF YOU MEAN R.O.V.R., YES.

7 Q WHAT I MEAN IS: I.R.A.C. AND

8 S.E.A.R.A.C. RESETTLED 18,000 BOAT PEOPLE; ISN'T THAT TRUE?

9 A THE NAME OF MY ORGANIZATION IS NOT MENTIONED.

10 Q NO, BUT ISN'T IT TRUE THAT I.R.A.C. AND

11 S.E.A.R.A.C. ARE THE ONES -- THE ORGANIZATIONS WHO RESETTLED

12 18,000 BOAT PEOPLE?

13 A YES.

14 Q BUT IN THIS COMMENT FROM DR. THANG, HE SAYS  
15 IT'S THE UNSTINTING EFFORTS OF THE B.P.S.O.S. ORGANIZATION AND  
16 A FEW ALLIES WHO ARE RESPONSIBLE FOR THAT, DOESN'T HE?

17 A YES, HE SAYS SO.

18 Q RIGHT.

19 AND SO THAT IS A COMMENT THAT AFFECTS YOU AND  
20 YOUR WORK, DOESN'T IT?

21 A YES, YES.

22 Q AND ISN'T IT TRUE THAT PEOPLE CALLED YOU TO  
23 TALK ABOUT THIS ONCE THEY SAW THIS?

24 MR. VOSS: OBJECTION. ASKED AND ANSWERED.

25 THE WITNESS: YES.

26 MR. VOSS: BEYOND THE SCOPE OF CROSS.

1 THE COURT: OVERRULED. BUT IT WAS. LET'S MOVE  
2 ALONG, BECAUSE THERE WAS ALREADY TESTIMONY TO THAT EFFECT.

3 BY MR. HART:

4 Q ALL RIGHT. THE CHRISTMAS VIDEO, YOU RECALL  
5 TALKING ABOUT THAT?

6 A YES.

7 Q CONGRESSMAN SMITH PRAISED NGUYEN DINH THANG AND  
8 B.P.S.O.S. FOR THEIR GOOD WORK, DIDN'T HE?

9 MR. VOSS: OBJECTION. ASKED AND ANSWERED.

10 THE WITNESS: YES.

11 THE COURT: OVERRULED. FOUNDATIONAL.

12 KEEP GOING, PLEASE.

13 BY MR. HART:

14 Q THE WORK THAT CONGRESSMAN SMITH PRAISED WAS  
15 ACTUALLY YOUR WORK AT I.R.A.C. AND S.E.A.R.A.C., WASN'T IT?

16 A YES, ACTUALLY, OUR WORK.

17 Q AND WHO PUBLISHED THIS HEADER PAGE THAT  
18 PROVIDED THE LINK TO CONGRESSMAN SMITH'S VIDEO? WHO PUBLISHED  
19 THIS?

20 A B.P.S.O.S.

21 Q THE DEFENDANT, B.P.S.O.S.?

22 A YES, THE DEFENDANT.

23 Q OKAY. NOW, PROFESSOR, LET ME SEE IF I CAN PUT  
24 UP -- I WANT TO PUT UP THE DORNAN LETTERS.

25 MR. HART: SO I APOLOGIZE TO EVERYBODY. IT MAY TAKE  
26 ME A MINUTE TO GET TO THOSE.

1 THE COURT: THE COURT'S COPY IS CLEAN, IN MY BINDERS,  
2 IF YOU NEED A CLEAN VERSION.

3 MR. HART: I THINK WE'RE ALL RIGHT, JUDGE. I'LL JUST  
4 USE THE EXHIBITS.

5 BY MR. HART:

6 Q TAKE A LOOK FOR A MOMENT AT EXHIBIT 18. IT'S  
7 THE NEXT ONE IN ORDER.

8 THE COURT: THERE'S NOT A TAB FOR IT. JUST TURN THE  
9 PAGE ONE MORE PAGE, MR. KHOA. 17. THERE'S NO TAB FOR IT  
10 BECAUSE IT'S A NEW ONE.

11 BY MR. HART:

12 Q OKAY. DO YOU SEE THIS? THIS IS THE MARCH 10,  
13 1996 LETTER FROM BOAT PEOPLE S.O.S. TO THE DIRECTOR OF OFFICE  
14 OF REFUGEE RESETTLEMENT.

15 YOU SEE THAT?

16 A I SEE THAT.

17 Q AND YOU WERE COPIED. YOU GOT A COPY OF THIS?

18 A YES, I GOT A COPY.

19 Q ALL RIGHT. AND PRIOR TO RECEIVING THIS LETTER  
20 IN MARCH OF 1996, DID YOU HAVE ANY CONTACT FROM NGUYEN DINH  
21 THANG OR ANYBODY AT BOAT PEOPLE S.O.S. TO EXPRESS ANY CONCERNS  
22 TO YOU ABOUT SOMETHING WITH THE S.E.A.R.A.C. OPERATION?

23 MR. VOSS: OBJECTION. RELEVANCE.

24 THE COURT: OVERRULED.

25 THE WITNESS: NO, I HAVE NO CONTACT BEFORE.

26 BY MR. HART:

1 Q OKAY. SO WERE YOU SURPRISED TO GET THIS  
2 LETTER?

3 MR. VOSS: OBJECTION. RELEVANCE.

4 THE COURT: I'LL GIVE HIM A LITTLE LATITUDE.

5 THE WITNESS: YES, VERY SURPRISED.

6 BY MR. HART:

7 Q OKAY. AND DID YOU REACH OUT TO ANYONE IN  
8 RESPONSE TO RECEIVING THIS LETTER TO SEE WHAT THE ISSUE WAS?

9 A THE FIRST THING IS THAT I AM THINKING ABOUT  
10 WRITING TO THE BOARD OF THE DIRECTORS OF -- THE BOARD OF  
11 DIRECTORS OF B.P.S.O.S. AND TO -- AND TO MAYBE -- AND WHOEVER  
12 CONTACT ME, BUT I DIDN'T REMEMBER WHO CONTACT ME ON THAT. I  
13 THINK JUST O.R.R. AND THE BOARD WITH B.P.S.O.S.

14 Q OKAY. SO DO YOU NOW REMEMBER THAT THE BOARD OF  
15 DIRECTORS FROM B.P.S.O.S. CONTACTED YOU?

16 MR. VOSS: OBJECTION. ASSUMES FACTS NOT IN EVIDENCE.

17 THE WITNESS: NO.

18 THE COURT: SUSTAINED.

19 THE WITNESS: THEY KEEP QUIET.

20 THE COURT: WAIT. WAIT. WAIT.

21 SUSTAINED.

22 BY MR. HART:

23 Q SO, PROFESSOR, IF YOU LOOK THROUGH THIS LETTER,  
24 IT'S SIX OR SEVEN PAGES, DO YOU SEE IN THERE ANY ISSUE RELATED  
25 TO YOUR EDUCATIONAL CREDENTIALS?

26 MR. VOSS: OBJECTION, YOUR HONOR. RELEVANCE. BEYOND

1 THE SCOPE OF CROSS-EXAMINATION.

2 THE COURT: OVERRULED AS TO THAT QUESTION.

3 YOU MAY RESPOND.

4 THE WITNESS: OKAY. TO WHAT QUESTION? ONLY MR. HART  
5 QUESTION; RIGHT?

6 THE COURT: BY MR. HEART.

7 THE WITNESS: SO I'M READING IT.

8 YES, I THINK SO, BUT LET ME CHECK.

9 MR. HART: TAKE YOUR TIME.

10 THE WITNESS: NO MENTION ABOUT MY EDUCATION IN HERE.

11 BY MR. HART:

12 Q OKAY. SO AS OF MARCH 1996, MARCH 10TH  
13 SPECIFICALLY, HAD ANYBODY FROM ANY ORGANIZATION EVER CONTACTED  
14 YOU TO TALK ABOUT WHETHER YOU HAD A REAL PH.D. OR NOT?

15 A NO.

16 Q SO AS OF MARCH 10, 1996, YOUR PH.D. STATUS HAD  
17 NOT BEEN BROUGHT UP BY ANYONE?

18 THE COURT: WELL, LET ME --

19 THE WITNESS: NOT ANYONE --

20 THE COURT: WAIT. WAIT. MY OWN OBJECTION IS THAT'S  
21 KIND OF VAGUE AS IN NOT "BROUGHT UP BY." BROUGHT UP TO WHOM?

22 MR. HART: OKAY. I'LL REPHRASE.

23 THE COURT: THANK YOU.

24 BY MR. HART:

25 Q WHEN WAS THE FIRST TIME ANYBODY QUESTIONED YOUR  
26 EDUCATIONAL CREDENTIALS?

1 A WELL, THAT WAS IN THE ARTICLE OF DR. THANG.

2 Q NO, THE FIRST TIME. REMEMBER, WE WENT THROUGH  
3 THE LETTERS FROM DORNAN?

4 A YEAH. ON MAY 25TH.

5 Q OKAY. PAY ATTENTION. LISTEN CAREFULLY TO MY  
6 QUESTION.

7 AS OF 1996, WHEN IS THE FIRST TIME ANYBODY  
8 MENTIONED ANYTHING ABOUT WHETHER YOU WERE A PH.D.?

9 A I THINK ONLY DR. THANG. AND THE FIRST TIME --  
10 AS OF 1996?

11 Q PROFESSOR, DID YOU GET A CONTACT FROM  
12 CONGRESSMAN DORNAN'S OFFICE IN THE SPRING OF 1996?

13 MR. VOSS: OBJECTION, YOUR HONOR. BEYOND THE SCOPE  
14 OF CROSS-EXAMINATION.

15 THE COURT: OVERRULED.

16 THE WITNESS: I DIDN'T HAVE ANY CONTACT WITH  
17 CONGRESSMAN DORNAN'S STAFF BEFORE.

18 BY MR. HART:

19 Q BEFORE MARCH OF '96?

20 A BEFORE MARCH OF '96.

21 Q AT SOME POINT AFTER THIS LETTER, DID  
22 CONGRESSMAN DORNAN ASK YOU TO PROVIDE HIM A COPY OF YOUR  
23 CURRICULUM VITAE?

24 A YES, IN -- I THINK THAT'S THE LETTER IN  
25 APRIL OR SOMETIME IN '96, 1996. HE DID ASK ME TO PROVIDE -- I  
26 DON'T KNOW WHETHER CURRICULUM VITAE OR NOT, BUT PROVIDE A FEW

1 DOCUMENTS.

2 Q AND DID YOU PROVIDE THEM?

3 A YEAH, I DID. I DID PROVIDE.

4 Q OKAY. NOW, TURN TO EXHIBIT 233, WHICH IS THE  
5 APRIL 2ND, 1996 LETTER FROM CONGRESSMAN DORNAN.

6 THE COURT: YOU MAY NEED TO APPROACH. IT'S IN THE  
7 OTHER BINDER.

8 MR. HART: I'LL GET IT FOR YOU, PROFESSOR.

9 THE WITNESS: OKAY.

10 BY MR. HART:

11 Q OKAY. YOU SEE THIS LETTER AT THE BEGINNING?  
12 THIS IS A LETTER FROM CONGRESSMAN DORNAN TO THE DIRECTOR OF  
13 O.R.R., OFFICE OF REFUGEE RESETTLEMENT?

14 A YES, THIS -- I SEE THAT.

15 Q ALL RIGHT. SO THE LETTER SAYS: "THIS IS A  
16 FOLLOWUP TO MY LETTER TO YOUR OFFICE ON MARCH 6, 1996."

17 DO YOU SEE THAT?

18 A YES, I SEE THAT.

19 Q ALL RIGHT. AND THEN IT SAYS: "SINCE THAT  
20 TIME, MY STAFF HAS CONTINUED OUR INVESTIGATION INTO THE  
21 S.E.A.R.A.C. ORGANIZATION."

22 DO YOU SEE THAT SECOND SENTENCE, IN MARCH OR  
23 APRIL OF 1996?

24 A YES, I SEE THAT.

25 Q IN MARCH OR APRIL OF 1996, YOU WERE THE  
26 PRESIDENT OF S.E.A.R.A.C., WERE YOU NOT?



1           A           YES, I WAS THE PRESIDENT.

2           Q           WERE YOU AWARE THAT CONGRESSMAN DORNAN'S OFFICE  
3 WAS DOING SOME KIND OF INVESTIGATION ON YOU?

4           MR. VOSS:   OBJECTION.   ASKED AND ANSWERED.

5           THE COURT:   OVERRULED.

6           THE WITNESS:  I DON'T KNOW WHETHER HE DID IT OR NOT.  
7 I'M NOT AWARE OF THAT.

8 BY MR. HART:

9           Q           SO OTHER THAN TO REQUEST A FEW DOCUMENTS, WHICH  
10 YOU PROVIDED, WAS THERE ANY OTHER CONTACT FROM DORNAN'S  
11 OFFICE?

12          A           NO.

13          Q           OKAY.   IN THE SECOND PARAGRAPH IT SAYS THAT:  
14 "ENCLOSED IS AN ARTICLE FROM MARCH 1996 COMMUNITY NEWS  
15 MAGAZINE PUBLISHED IN MY DISTRICT IN ORANGE COUNTY, CALIFORNIA  
16 ENTITLED 'S.E.A.R.A.C. AND N.A.V.A.S.A. FOUND TO HAVE  
17 MISAPPROPRIATED VIETNAMESE COMMUNITY OF ORANGE COUNTY NAME.'"

18                       DO YOU SEE THAT?   THAT'S IN THE SECOND  
19 PARAGRAPH.

20          A           YEAH, I SEE THIS, BUT IT'S TRUE -- NO, IT'S  
21 FALSE.

22          Q           DO YOU KNOW ANYTHING ABOUT THIS CONTENTION THAT  
23 S.E.A.R.A.C. AND N.A.V.A.S.A. MAY HAVE MISAPPROPRIATED SOME  
24 COMMUNITY NAME?

25          A           NO.   THIS IS WRONG.   I DON'T THINK SO.   I DON'T  
26 AGREE WITH THIS.

1 Q OKAY. WHAT DO YOU KNOW ABOUT THE CHARGE THAT  
2 S.E.A.R.A.C. MISAPPROPRIATED A COMMUNITY NAME?

3 A YEAH, DEFINITELY S.E.A.R.A.C. NEVER  
4 MISAPPROPRIATED THE COMMUNITY NAME.

5 Q DID ANYBODY EVER CONTACT YOU TO CLAIM OR TO  
6 NOTIFY YOU THAT THEY WERE MAKING THAT CHARGE?

7 A NOBODY TO CONTACT ME FOR THIS.

8 Q DID YOU EVER READ THAT ARTICLE?

9 A I'M NOT SURE IF I READ IT OR I JUST HEARD ABOUT  
10 THAT, BUT I -- I MAY HAVE READ IT MAYBE, BUT -- BUT, YOU KNOW,  
11 SO MANY THINGS IN THE COMMUNITY THAT YOU CAN -- YOU CANNOT  
12 READ EVERYTHING, BUT I MAY HAVE.

13 Q DO YOU KNOW WHO THE PERSON AL SANTOLI IS?

14 A YES, I KNOW AL SANTOLI.

15 Q WHO IS THAT PERSON?

16 A WHO? HE'S A WRITER, AND HE USED TO CONTACT TO  
17 COOPERATE WITH S.E.A.R.A.C. AND I PERSONALLY ORGANIZE FOR HIM  
18 TO TALK A FEW TIMES --

19 Q ARE YOU SURE THAT'S WHO AL SANTOLI IS?

20 A -- ABOUT THE REFUGEE SITUATION.

21 Q OKAY. LOOK AT THE BOTTOM OF THE SECOND PAGE OF  
22 EXHIBIT 233. YOU SEE THE LAST SENTENCE WHERE CONGRESSMAN  
23 DORNAN SAYS, "IF YOU HAVE ANY QUESTIONS, PLEASE CALL MY  
24 ASSISTANT, AL SANTOLI," AND HE GIVES A PHONE NUMBER?

25 A OKAY. I SEE THAT, BUT I KNOW SANTOLI. I KNOW  
26 AL SANTOLI, BUT I DID NOT CONTACT HIM ABOUT THIS.

1 Q DID YOU KNOW HIM TO BE AN EMPLOYEE OF  
2 CONGRESSMAN DORNAN?

3 A YES, I ALREADY KNOW THROUGH THIS LETTER.

4 Q OKAY. SO YOU'VE INTERACTED WITH HIM BEFORE,  
5 BEFORE THE DATE OF THIS LETTER?

6 A BEFORE, YES.

7 Q OKAY. ALL RIGHT. LET'S MOVE ON TO  
8 EXHIBIT 234, WHICH IS THE APRIL 30TH LETTER.

9 NEXT ONE, PROFESSOR.

10 A YES, I SEE THAT.

11 Q OKAY. AND IN THE FIRST PARAGRAPH, YOU SEE THAT  
12 IT SAYS: "BEGINNING IN JANUARY 1996, I HAVE RECEIVED AN  
13 OVERWHELMING NUMBER OF TELEPHONE CALLS AND LETTERS FROM  
14 RESPECTED VIETNAMESE LEADERS IN MY DISTRICT AND ACROSS THE  
15 UNITED STATES."

16 DO YOU SEE THAT IN THE FIRST PARAGRAPH?

17 A YES, I SEE THAT.

18 Q AND THEN THE NEXT SENTENCE SAYS:

19 "SPECIFICALLY, THEY HAVE EXPRESSED THEIR OPPOSITION TO FEDERAL  
20 GOVERNMENT FUNDING OF PRIVATE 501(C)(3) ORGANIZATION SOUTHEAST  
21 ASIA RESOURCE ACTION CENTER, FORMALLY KNOWN AS INDOCHINA  
22 RESOURCE ACTION CENTER."

23 YOU SEE THAT?

24 A I KNOW THAT THROUGH THIS LETTER ONLY.

25 Q OKAY. SO THEY'RE TALKING ABOUT I.R.A.C. AND  
26 S.E.A.R.A.C., THIS LETTER FROM DORNAN?

1 A THEY TALK ABOUT -- WELL, EITHER.

2 Q LISTEN CAREFULLY TO THIS QUESTION.

3 A I'M SORRY. LET ME SEE. IT WAS S.E.A.R.A.C.

4 Q RIGHT.

5 PROFESSOR, IN 1996, WERE YOU ACQUAINTED WITH  
6 ANY OF THE COMMUNITY LEADERS IN THE VIETNAMESE-AMERICAN  
7 COMMUNITY IN ORANGE COUNTY?

8 A YEAH, I KNOW SOME OF THEM.

9 Q OKAY. DID ANY OF THEM EVER CONTACT YOU TO  
10 COMPLAIN ABOUT S.E.A.R.A.C.?

11 A NO.

12 Q ALL RIGHT. HAVE ANY VIETNAMESE-AMERICAN  
13 LEADERS FROM ANY OTHER COMMUNITY EVER CONTACTED YOU IN 1996 TO  
14 COMPLAIN ABOUT S.E.A.R.A.C.?

15 MR. VOSS: OBJECTION. VAGUE.

16 THE COURT: OVERRULED.

17 YOU MAY RESPOND.

18 THE WITNESS: SOME OF THEM, THEY CONTACT ME, BUT  
19 THEY -- THEY DIDN'T TALK -- THEY DID NOT EXPRESS ANY OBJECTION  
20 TO -- TO -- MY ACTIVITY TO S.E.A.R.A.C. AT ALL.

21 BY MR. HART:

22 Q OKAY. SO MOVING ON IN THIS FIRST PARAGRAPH, IT  
23 THEN SAYS, "THEIR CONCERNS INCLUDE," AND WE HAVE THE FIVE  
24 ITEMS.

25 DO YOU SEE THAT?

26 A YES, I SEE THAT.

1 Q ALL RIGHT. AND SO WHEN, IN ITEM NUMBER 5, IT  
2 SAYS, "MR. KHOA'S SELF-PROMOTION AS PH.D.," THEN THIS IS ONE  
3 OF THE CONCERNS COMMUNICATED TO CONGRESSMAN DORNAN; ISN'T THAT  
4 RIGHT?

5 A YES, THAT'S COMMUNICATED TO DORNAN.

6 Q OKAY. SO IF AN OVERWHELMING NUMBER OF  
7 TELEPHONE CALLS AND LETTERS FROM RESPECTED VIETNAMESE-AMERICAN  
8 LEADERS IN ORANGE COUNTY -- OH, AND ACROSS THE UNITED STATES,  
9 HAVE CONTACTED DORNAN TO EXPRESS THIS CONCERN ABOUT YOUR  
10 SELF-PROMOTION OF PH.D., DID ANY OF THEM CONTACT YOU ABOUT IT?

11 A NO.

12 Q IS THIS APRIL 30, 1996 LETTER FROM CONGRESSMAN  
13 DORNAN THE FIRST TIME YOU HAD ANY NOTICE THAT THERE WAS SOME  
14 QUESTION ABOUT WHETHER YOU WERE A PH.D. OR NOT?

15 A YES, THAT'S THE FIRST TIME.

16 Q AND THIS LETTER WASN'T COPIED TO YOU, WAS IT?

17 A I DON'T KNOW IF IT WAS COPIED TO ME OR NOT, BUT  
18 I READ IT. I SAW THAT.

19 Q DO YOU KNOW HOW YOU GOT A COPY OF THIS LETTER?

20 A I THINK -- NO, I DON'T THINK SO. I DID NOT GET  
21 A COPY. THIS COPY, THE 30TH OF APRIL TO THE STATE DEPARTMENT,  
22 I DIDN'T GET IT.

23 Q YOU HAVE SEEN THIS BEFORE; RIGHT?

24 A YEAH, BEFORE THIS DATE, YES.

25 Q BUT YOU CAN'T REMEMBER WHEN YOU FIRST SAW IT?

26 A I COULDN'T REMEMBER, YES.

1 Q OKAY. NOW, WERE YOU AWARE, IN 1996, THAT  
2 AL SANTOLI, FROM CONGRESSMAN DORNAN'S OFFICE, WAS INVITING  
3 NGUYEN DINH THANG TO COME OVER TO THE OFFICE SO HE COULD GIVE  
4 HIM DOCUMENTS FROM S.E.A.R.A.C.?

5 MR. VOSS: OBJECTION. ASSUMES FACTS NOT IN EVIDENCE.  
6 MISCHARACTERIZES THE EVIDENCE.

7 THE WITNESS: I DIDN'T KNOW THAT --

8 THE COURT: WAIT. WAIT. OVERRULED.

9 YOU MAY ANSWER NOW, SIR.

10 THE WITNESS: OKAY. I DIDN'T -- I DIDN'T GET THAT.  
11 I DON'T KNOW THAT.

12 BY MR. HART:

13 Q YOU DIDN'T KNOW THAT MR. SANTOLI --

14 A I KNOW NOTHING ABOUT --

15 Q -- WAS GIVING S.E.A.R.A.C. DOCUMENTS TO  
16 NGUYEN --

17 A I DON'T KNOW ABOUT ANYTHING ABOUT RELATIONSHIP  
18 BETWEEN SANTOLI AND DR. THANG.

19 Q OKAY. IN MARCH OF 1996, WAS THERE A  
20 CONGRESSMAN SMITH -- HOLD ON. LET ME BACK UP AND REPHRASE  
21 THAT.

22 DO YOU RECOGNIZE THE TERM "ANTI-CPA AMENDMENT"?  
23 DO YOU REMEMBER THAT FROM YOUR TIME IN 1996?

24 A YEAH. THE TERM "ANTI-CPA AMENDMENT," I READ IT  
25 IN THE ARTICLE OF DR. THANG.

26 Q OKAY. BACK IN 1996, WERE YOU AWARE OF

1 CONGRESSMAN SMITH'S AMENDMENT?

2 A THAT WAS THE ARTICLE OF DR. THANG -- YEAH, IN  
3 1996, I KNOW ABOUT CONGRESSMAN SMITH AMENDMENT.

4 Q OKAY. TELL US --

5 A THAT KIND OF AMENDMENT, ESPECIALLY, IT IS VERY  
6 CONFUSING ABOUT AMENDMENT.

7 Q OKAY. TELL US WHAT YOU REMEMBER ABOUT THE  
8 ANTI-CPA AMENDMENT AUTHORED BY CONGRESSMAN SMITH IN 1996.

9 MR. VOSS: OBJECTION. RELEVANCE. 352. BEYOND THE  
10 SCOPE OF --

11 THE WITNESS: OKAY.

12 THE COURT: WAIT. WAIT.

13 LET ME HEAR THE REST OF THAT.

14 MR. VOSS: BEYOND THE SCOPE OF CROSS-EXAMINATION.

15 THE COURT: SUSTAINED.

16 BY MR. HART:

17 Q OKAY. PROFESSOR, WHEN YOU SUBMITTED GRANT  
18 APPLICATIONS TO DIFFERENT GOVERNMENT ENTITIES, DID ANYONE  
19 REQUIRE YOU TO SIGN THEM UNDER PENALTY OF PERJURY?

20 MR. VOSS: OBJECTION. ASKED AND ANSWERED.

21 THE COURT: OVERRULED.

22 YOU KNOW MAY RESPOND.

23 THE WITNESS: I WAS NOT REQUIRED TO SIGN UNDER  
24 PENALTY OF PERJURY.

25 BY MR. HART:

26 Q OKAY. DID YOU EVER HEAR THAT TERM "PENALTY OF

1 PERJURY" BEFORE TODAY?

2 A NO.

3 Q AND NEVER IN THE CONTEXT OF SUBMITTING GRANT  
4 APPLICATIONS?

5 A I NEVER HEARD OF THE WORD "PENALTY OF PERJURY"  
6 BEFORE TODAY RELATING TO GRANT APPLICATIONS, MY GRANT  
7 APPLICATIONS.

8 Q OKAY. SO WHEN YOU DID THOSE GRANT  
9 APPLICATIONS, YOU DID EVERYTHING IN YOUR POWER TO MAKE SURE  
10 THEY WERE ACCURATELY SET FORTH; CORRECT? YOU WERE CAREFUL NOT  
11 TO MAKE MISTAKES?

12 A YEAH. WHEN I SIGN A GRANT, I AM SURE THAT I  
13 HAVE READ IT AND APPROVE IT SO THAT I CAN SIGN IT.

14 Q OKAY. AND ALL THE WAY UP UNTIL MARCH OF 1996  
15 OR MAYBE APRIL OF 1996, NOBODY HAD EVER CHALLENGED YOU ABOUT A  
16 PH.D. DEGREE, HAD THEY?

17 A NOBODY CHALLENGE ME.

18 Q OKAY. SO YOU WERE, IN 1996, ONE YEAR AWAY FROM  
19 RETIREMENT, LESS THAN A YEAR?

20 A YES.

21 Q BEFORE DR. THANG PUBLISHED IN HIS MAY 25, 2020  
22 ARTICLE, HAD ANYONE EVER ACCUSED YOU OF FALSELY CLAIMING A  
23 PH.D. OR DOCTORAL DEGREE AS PART OF A GRANT APPLICATION?

24 A NOBODY AT ALL.

25 MR. VOSS: OBJECTION. COMPOUND.

26 THE COURT: WAIT. WAIT. WAIT. WAIT.



1 MR. VOSS: OBJECTION. COMPOUND AND RELEVANCE.

2 THE COURT: OVERRULED.

3 YOU MAY RESPOND, SIR.

4 THE WITNESS: NOBODY DID IT. THAT MEANS NOBODY  
5 ACCUSE ME FOR THIS.

6 BY MR. HART:

7 Q DID ANYBODY FROM CONGRESSMAN DORNAN'S OFFICE  
8 EVER ACCUSE YOU OF FALSELY CLAIMING A PH.D. DEGREE?

9 A NO.

10 MR. VOSS: AGAIN --

11 THE COURT: WAIT. WAIT. WAIT.

12 MR. VOSS: -- RELEVANCE AS PHRASED.

13 THE COURT: OVERRULED.

14 YOU MAY RESPOND NOW, SIR.

15 THE WITNESS: NOBODY FROM THE CONGRESSMAN OFFICE  
16 CONTACT ME OR ACCUSE ME BEFORE THAT.

17 BY MR. HART:

18 Q OKAY. LET'S LOOK, WHILE WE'RE ON THIS SUBJECT,  
19 AT -- YOU'RE ON 234, CORRECT, THIS IS THE APRIL 30 LETTER?

20 A YES.

21 Q ONE OF THE CONCERNS, ITEM NUMBER 5:

22 "MISREPRESENTATION OF ACADEMIC CREDENTIALS MAY HAVE RESULTED  
23 IN RECEIVING STATE DEPARTMENT GRANTS OVER COMPETING  
24 APPLICANTS."

25 YOU SEE THAT?

26 A YEAH, I SEE THAT.

1 Q WHEN YOU WERE SUBMITTING GRANT APPLICATIONS TO  
2 THE FEDERAL GOVERNMENT, WERE YOU COMPETING WITH OTHER NGO'S OR  
3 501(C)(3) COMPANIES FOR THE MONEY YOU WERE ASKING FOR?

4 MR. VOSS: OBJECTION. CALLS FOR SPECULATION.  
5 MISSTATES THE EVIDENCE.

6 THE COURT: OVERRULED. IT ASKED FOR HIS KNOWLEDGE,  
7 TO HIS KNOWLEDGE.

8 THE WITNESS: I DON'T THINK I'M COMPETING WITH  
9 ANYBODY.

10 BY MR. HART:

11 Q OKAY. CAN YOU EVER REMEMBER IN THAT TIME  
12 FRAME --

13 A NO COMPETITION IN HERE.

14 Q SO IT WAS JUST A MATTER OF SEEING A NEED AND  
15 SUBMITTING AN APPLICATION FOR FUNDING TO SERVE THAT NEED?

16 A THAT'S CORRECT.

17 MR. VOSS: OBJECTION. CALLS FOR SPECULATION.

18 THE COURT: WAIT. WAIT.

19 MR. VOSS: CALLS FOR SPECULATION.

20 THE COURT: OVERRULED. IT'S HIS UNDERSTANDING OF THE  
21 PROCESS.

22 BY MR. HART:

23 Q WOULD YOU SAY YOUR ANSWER AGAIN, PLEASE,  
24 PROFESSOR.

25 A I'M SURE THAT I'M NOT COMPETING. AND I'M NOT  
26 AWARE THAT -- OR WHO -- WHICH NGO IS SUBMITTING TOO. I DON'T

1 KNOW.

2 Q IT'S A BLIND PROCESS?

3 A I DID NOT -- I WAS NOT CONCERNED ABOUT THAT.

4 Q OKAY. DID YOU EVER FAIL TO GET FUNDING FROM A  
5 GRANT APPLICATION?

6 A I'M PRETTY SURE I CAN GET THE FUNDING  
7 BECAUSE -- YEAH, IT BELONG TO THE R.O.V.R. PROGRAM ANYWAY,  
8 AND --

9 THE COURT: MR. KHOA, I DON'T THINK THAT'S THE  
10 QUESTION.

11 BY MR. HART:

12 Q LET ME ASK IT AGAIN.

13 IN ALL YOUR TIME AT I.R.A.C. AND S.E.A.R.A.C.,  
14 WHEN YOU MADE GRANT APPLICATIONS TO THE GOVERNMENT -- TO THE  
15 GOVERNMENT NOW, NOT ANYBODY ELSE -- DID YOU EVER FAIL TO GET  
16 THE GRANT? DID THEY EVER REJECT YOU?

17 MR. VOSS: OBJECTION. RELEVANCE. BEYOND THE SCOPE  
18 OF CROSS.

19 THE COURT: OVERRULED.

20 YOU MAY RESPOND.

21 THE WITNESS: YES, IT'S UNDER S.E.A.R.A.C.,  
22 DEFINITELY. THE NAME OF S.E.A.R.A.C. WAS STARTED IN 1993. SO  
23 DEFINITELY IN '96 IT'S DEFINITELY S.E.A.R.A.C., NOT I.R.A.C.  
24 OKAY.

25 AND NUMBER TWO, THIS IS MY FIRST GRANT AND THE  
26 ONLY GRANT APPLICATION THAT I SUBMITTED TO THE STATE

1 DEPARTMENT. OKAY. AND THERE WAS NO REJECTION AT ALL.

2 MR. HART: OKAY.

3 MR. VOSS: OBJECTION. MOVE TO STRIKE AS  
4 NONRESPONSIVE.

5 THE COURT: I WILL STRIKE THAT ONE AS NONRESPONSIVE.  
6 YOU CAN ASK IT AGAIN, THOUGH, TO --

7 BY MR. HART:

8 Q PROFESSOR KHOA, THE QUESTION IS WHETHER OR NOT  
9 IN ANY OF YOUR GRANT APPLICATIONS, FROM THE I.R.A.C. YEARS TO  
10 THE S.E.A.R.A.C. YEARS, WERE YOUR APPLICATIONS EVER REJECTED?

11 A AS I SAID, THIS IS THE FIRST TIME THAT I SUBMIT  
12 A GRANT APPLICATION WITH THE STATE DEPARTMENT, AND IT WAS NOT  
13 REJECTED.

14 THE COURT: MR. KHOA, IT'S NOT LIMITED -- LET ME TRY  
15 THIS.

16 MR. KHOA, AT ANY TIME THAT EITHER I.R.A.C. OR  
17 S.E.A.R.A.C. SUBMITTED A GRANT APPLICATION TO THE FEDERAL  
18 GOVERNMENT, REGARDLESS OF THE DEPARTMENT OR DIVISION, WERE ANY  
19 DENIED?

20 THE WITNESS: AS FAR AS I REMEMBER, NO REJECTION FROM  
21 THE GOVERNMENT.

22 BY MR. HART:

23 Q OKAY. WOULD YOU SOMETIMES GET QUESTIONS IN  
24 RESPONSE TO A GRANT APPLICATION?

25 A I DON'T THINK SO.

26 Q OKAY.

1           A           MAYBE SOME CLARIFICATION OR WHAT, BUT NO  
2 REJECTION.

3           Q           SOME THINGS THAT NEEDED TO BE FIXED?

4           A           NO, I DON'T THINK.

5           Q           YOU DON'T REMEMBER EVER HAVING THAT ISSUE?

6           A           THAT'S VERY MINOR, I THINK.

7           Q           OKAY. PLEASE TAKE A LOOK AT EXHIBIT 212.

8           THE COURT: HE MAY NEED HELP. THAT'S IN A DIFFERENT  
9 BINDER.

10 BY MR. HART:

11          Q           REMIND THE JURY WHAT EXHIBIT 212 IS, PLEASE.

12          A           YES, I HAVE IT.

13          Q           OKAY. REMIND THE JURY WHAT THAT IS, PLEASE.

14          A           SO THIS IS BIODATA WRITTEN BY SOMEBODY IN MY  
15 STAFF.

16          Q           OKAY. SO THIS WOULD HAVE BEEN FROM BEFORE 1993  
17 WHEN YOU WERE STILL I.R.A.C.?

18          A           I ALREADY EXPLAIN ABOUT THIS BEFORE, AND I CAN  
19 REPEAT IT NOW. THE PURPOSE OF THIS --

20          THE COURT: MR. KHOA.

21          THE WITNESS: -- IS TO --

22          THE COURT: THERE'S NO QUESTION PENDING, FIRST OF  
23 ALL. AND THEN THERE WAS EFFORT TO HAVE AN OBJECTION.

24          MR. VOSS: WELL, IF THERE'S NO QUESTION PENDING, I  
25 CAN'T HAVE AN OBJECTION.

26          THE COURT: OKAY.

1 BY MR. HART:

2 Q PROFESSOR -- WAITING FOR THE TECHNOLOGY TO  
3 CATCH UP -- WHO PREPARED THIS DOCUMENT THAT WE SEE IN  
4 EXHIBIT 212?

5 MR. VOSS: OBJECTION. ASKED AND ANSWERED.

6 THE COURT: OVERRULED.

7 THE WITNESS: OKAY. IT SHOULD BE PREPARED BY ONE OF  
8 MY STAFF, BUT I COULD NOT REMEMBER THE NAME. FOR EXAMPLE, IT  
9 CAN BE PREPARED BY THE DEPUTY OR EVEN MY SECRETARY.

10 BY MR. HART:

11 Q OKAY. WAS IT PREPARED BY YOU?

12 A JUST TO INTRODUCE ME TO THE AUDIENCE.

13 Q WE'LL GET TO THAT.

14 WAS THIS PREPARED BY YOU IN ANY WAY?

15 A NO, IT'S NOT PREPARED BY ME.

16 Q HOW DID I.R.A.C. USE THIS DOCUMENT THAT WE SEE  
17 AS EXHIBIT 212?

18 MR. VOSS: OBJECTION. ASKED AND ANSWERED.

19 THE COURT: OVERRULED.

20 THE WITNESS: AS I SAID, IT IS USED IN THE PUBLIC  
21 MEETING. FOR EXAMPLE, WHEN I WAS INTRODUCED TO THE AUDIENCE  
22 OR WHEN VISITORS CAME TO S.E.A.R.A.C. TO VISIT S.E.A.R.A.C.,  
23 AND MY STAFF GAVE THEM IN ADVANCE, MAYBE, ABOUT ME.

24 BY MR. HART:

25 Q OKAY. TO YOUR KNOWLEDGE, WAS THIS DOCUMENT,  
26 EXHIBIT 212, EVER USED AS ANY PART OF A GRANT APPLICATION?

1           A       NO. THIS IS NOT A RESUME TO BE ATTACHED TO ANY  
2 APPLICATION, GRANT APPLICATION.

3           Q       LET'S LOOK AT EXHIBIT 214, PLEASE.

4           A       YES, I HAVE 214.

5           Q       YOU SEE THAT?

6           A       (NO AUDIBLE RESPONSE.)

7           Q       CAN YOU TELL US WHAT IT MEANS TO BE "RESPONSES  
8 TO ISSUES OF CONCERN"? WHAT DOES THAT TITLE MEAN?

9           A       THIS NUMBER OF ISSUE -- ISSUES OF CONCERN OF  
10 TECHNICAL PROPOSAL. I DID NOT PREPARE THIS, BUT I THINK THAT  
11 THIS IS -- I THINK THAT THIS IS THE USUAL WAY BETWEEN THE  
12 PROPOSAL WRITER AND THE -- AND THE GRANTER.

13                       SO THIS IS PART OF THE AGREEMENT BETWEEN THE  
14 PROPOSAL AND THE GRANTER. THIS IS THE KIND OF AGREEMENT OF  
15 ISSUES THAT THEY AGREED AND SIGN IT.

16           Q       ALL RIGHT. DO YOU UNDERSTAND --

17           A       NEGOTIATED BETWEEN -- BETWEEN MY STAFF AND  
18 THE -- AND THE GRANTER.

19           Q       SO WHAT YOU'RE SAYING IS WHEN YOU'RE DEALING  
20 WITH A GRANTER, THEY MAY PUT LIMITS OR TERMS ON THE GRANT OF  
21 FUNDING?

22                       MR. VOSS: OBJECTION. LEADING. ASSUMES FACTS NOT IN  
23 EVIDENCE.

24                       THE COURT: OVERRULED.

25                       JUST BE CAREFUL WITH THE LEADING.

26                       THE WITNESS: YES, THIS HAS CONDITIONS.

1 BY MR. HART:

2 Q SO AFTER THE GRANT IS -- PROPOSAL IS DELIVERED  
3 TO THE GRANTOR, THEY MAY COME BACK WITH ISSUES; IS THAT WHAT  
4 THIS IS ABOUT?

5 MR. VOSS: OBJECTION. BEYOND THE SCOPE OF  
6 CROSS-EXAMINATION.

7 THE COURT: OVERRULED.

8 THE WITNESS: YEAH, IF -- IF -- IF THE ISSUES ARE NOT  
9 OBSERVED. THAT MEANS IF THEY IN VIOLATION. BUT I DON'T THINK  
10 ANY -- ANY VIOLATION HAS BEEN -- HAS OCCURRED.

11 BY MR. HART:

12 Q OKAY. DID YOU HAVE ANYTHING TO DO WITH  
13 PREPARING THIS PARTICULAR DOCUMENT, EXHIBIT 214?

14 A NO. FRANKLY, I -- I DID NOT PREPARE THIS. SO  
15 I DON'T KNOW.

16 Q DID YOU HAVE ANYTHING TO DO WITH PREPARING IT?

17 A I DID NOT PREPARE IT. I DID NOT PARTICIPATE IN  
18 THE PROCESS.

19 Q OKAY.

20 A THIS IS A TECHNICAL BETWEEN MY STAFF OR THE  
21 PROJECT DIRECTOR AND THE GRANTEE.

22 Q OKAY. SO LET'S TURN TO EXHIBIT 221, PLEASE.  
23 THAT'S THE LAST EXHIBIT IN THAT NO. 1 BINDER.

24 A YES, I HAVE 221 IN HERE.

25 Q OKAY. THIS EXHIBIT IS EIGHT PAGES.

26 CAN YOU TELL WHAT THIS EXHIBIT ACTUALLY IS?



1 A THE EXHIBIT --

2 MR. VOSS: OBJECTION. ASKED AND ANSWERED.

3 THE COURT: WAIT. WAIT FOR JUST ONE MOMENT.

4 OVERRULED.

5 NOW YOU MAY RESPOND, SIR.

6 THE WITNESS: OKAY. THIS PROPOSAL IS TECHNICAL  
7 PROPOSAL SUBMITTED TO THE SECRETARY OF ADMINISTRATION IN  
8 BALTIMORE, MARYLAND.

9 BY MR. HART:

10 Q CAN YOU LOOK THROUGH THE DIFFERENT PAGES. WHEN  
11 I LOOK AT PAGE 3, THE PAGE NUMBER SAYS 61.

12 DO YOU SEE THAT?

13 A YES, I SEE THAT NOW.

14 Q DO YOU KNOW WHERE THE OTHER 59 PAGES ARE?

15 MR. VOSS: OBJECTION. RELEVANCE, YOUR HONOR. BEYOND  
16 THE SCOPE OF CROSS. THE DOCUMENT'S BEEN RECEIVED INTO  
17 EVIDENCE.

18 THE COURT: COUNSEL, IF WE COULD HAVE A QUICK  
19 SIDEBAR.

20 WAIT. WAIT. WAIT, MR. KHOA, YOU CAN FLIP  
21 THROUGH THAT, TAKE YOUR TIME TO LOOK AT IT, BUT WE'RE JUST  
22 GOING TO TAKE A MOMENT HERE.

23 (SIDEBAR. NO REPORTER.)

24 (BACK IN OPEN COURT.)

25 THE COURT: THANK YOU VERY KINDLY, LADIES AND  
26 GENTLEMEN. JUST A LITTLE BIT MORE BEFORE WE GET TO OUR BREAK

1 THIS AFTERNOON.

2 GO RIGHT AHEAD. YOU MAY CONTINUE, MR. HART.

3 MR. HART: THANK YOU, YOUR HONOR.

4 THAT'S ALL, JUDGE.

5 THE COURT: ANYTHING, MR. VOSS?

6 MR. VOSS: YES.

7 RECROSS-EXAMINATION

8 BY MR. VOSS:

9 Q MR. KHOA, AGAIN, JUST NOW YOU WERE ASKED  
10 QUESTIONS ABOUT YOUR PH.D. STATUS; ISN'T THAT CORRECT?

11 A YES.

12 Q OKAY. AT ANY TIME DID DR. THANG OR B.P.S.O.S.  
13 EVER USE THAT SPECIFIC PHRASE, "PH.D." --

14 A YES.

15 Q -- IN RAISING ANY ISSUE ABOUT YOU AT ALL?

16 A I THINK HE USE BOTH --

17 Q WHERE?

18 A -- PH.D. AND DOCTOR.

19 Q CAN YOU TELL US WHERE, IN WRITING, DR. THANG OR  
20 B.P.S.O.S. EVER USED THAT TERM OF ART "PH.D." THAT YOU WERE  
21 QUESTIONED ABOUT?

22 A WELL, I NEED TO CHECK WHAT HE SAID IN HIS  
23 ARTICLE.

24 Q LET'S TURN TO EXHIBIT NUMBER 18.

25 THE COURT: I THINK THAT'S IT RIGHT THERE.

26 BY MR. VOSS:

1 Q THIS IS THE MARCH 10, 1996 LETTER FROM  
2 B.P.S.O.S. TO MS. LIMON; RIGHT?

3 A (NO AUDIBLE RESPONSE.)

4 Q THERE'S NOT -- AT NO TIME IN THIS LETTER --  
5 THE COURT: WAIT. WAIT. HE'S STILL FLIPPING AROUND.

6 THE WITNESS: LET ME SEE THAT.

7 THE COURT: RIGHT THERE.

8 THE WITNESS: WHAT NUMBER? THIS ONE?

9 THE COURT: YES.

10 THE WITNESS: YEAH, OKAY. SO IT'S NUMBER 18.

11 THE COURT: GO RIGHT AHEAD, MR. VOSS.

12 BY MR. VOSS:

13 Q AT NO TIME IN EXHIBIT 18 DID THE PHRASE OF ART  
14 "PH.D." EVER GET USED; ISN'T THAT CORRECT?

15 A NO, I DON'T THINK SO.

16 Q YOU WOULD AGREE WITH ME "PH.D." IS NEVER  
17 MENTIONED IN THIS LETTER?

18 A NO -- YES.

19 Q YOU WOULD AGREE?

20 A YEAH, IT'S NOT MENTIONED IN THERE.

21 Q OKAY. AND THE FACT OF THE MATTER IS YOU WERE  
22 ASKED ABOUT -- THE FIRST TIME YOU WERE QUESTIONED ABOUT YOUR  
23 DOCTOR'S CREDENTIALS, IT'S CORRECT TO SAY THAT THERE IS  
24 NOTHING AT ALL IN EXHIBIT 18 QUESTIONING YOUR CREDENTIALS FOR  
25 HAVING A DOCTOR'S DEGREE; ISN'T THAT CORRECT? IT'S DEVOID OF  
26 ANY COMMENT ABOUT YOUR DOCTORAL DEGREE?

1           A           IT'S NOT IN THIS DOCUMENT BUT IN OTHER  
2 DOCUMENTS.

3           Q           OKAY. SO WHEN COUNSEL TOOK YOU, THEN, TO THE  
4 APRIL 30TH LETTER FROM CONGRESSMAN DORNAN, WHERE THE CONCERN  
5 RAISED IS YOUR SELF-PROMOTION AS A PH.D. AS A RESULT OF THE  
6 OVERWHELMING TELEPHONE CALLS AND LETTERS, THIS LETTER FROM MY  
7 CLIENT DIDN'T SAY ANYTHING ABOUT A PH.D., DID IT?

8           A           WELL, I THINK THAT THE CONGRESSMAN LETTER,  
9 RIGHT, MENTION -- RAISE THE ISSUE OF PH.D. I MEAN, THAT THERE  
10 WAS CONFUSION BETWEEN PH.D. AND DOCTOR, MAYBE HE UNDERSTOOD  
11 PH.D. AS DOCTOR OR DOCTOR AS PH.D. I DON'T KNOW.

12          Q           MAYBE HE DID, BUT THAT CONCERN DIDN'T COME FROM  
13 MY CLIENT IN EXHIBIT NUMBERS 18, DID IT? WHATEVER CONCERN HE  
14 HAD ABOUT PH.D. OR NOT, IT DIDN'T COME FROM DR. THANG, DID IT?

15                   THE COURT: IN EXHIBIT 18?

16                   MR. VOSS: IN EXHIBIT 18.

17                               AND I'M GOING TO TAKE HIM TO THE NEXT ONE.

18                   THE WITNESS: I HAVE THE COPY OF THE LETTER, THE  
19 EXHIBIT NUMBER 18. SO WHAT EXACTLY IS THE QUESTION?

20 BY MR. VOSS:

21          Q           ISN'T IT CORRECT TO SAY THAT OF THESE  
22 CONCERNS --

23          A           IS THERE A DIFFERENCE BETWEEN --

24                   THE COURT: WAIT. WAIT. ONE AT A TIME. WE CAN'T  
25 TALK OVER ONE ANOTHER. HE'S GOING TO RESTATE A QUESTION FOR  
26 YOU.

1 BY MR. VOSS:

2 Q ISN'T IS IT CORRECT TO SAY THAT OF THE CONCERNS  
3 RAISED BY THE CONGRESSMAN, IN PARTICULAR, NUMBER 5 REGARDING  
4 ACADEMIC CREDENTIALS, THAT THERE WAS NO ISSUE REGARDING YOUR  
5 ACADEMIC CREDENTIALS RAISED BY EXHIBIT NUMBER 18 FROM  
6 B.P.S.O.S.?

7 A I THINK CONGRESSMAN DID NOT MENTION ANYTHING  
8 ABOUT ACADEMIC CREDENTIALS IN THE EXHIBIT 18. HE DIDN'T  
9 MENTION ANYTHING ABOUT THAT.

10 Q SO IF B.P.S.O.S., YOU AGREE, DID NOT RAISE  
11 ANYTHING ABOUT ACADEMIC CREDENTIALS IN THE MARCH 10, 1996  
12 LETTER, WOULD YOU ALSO AGREE THAT THIS LETTER COULD NOT BE THE  
13 PROMPTING FOR THE CONGRESSMAN TO INVESTIGATE ACADEMIC  
14 CREDENTIALS IN NUMBER 5?

15 A I HAVE NO IDEA.

16 Q YOU ALSO SAID, AT ONE POINT IN YOUR TESTIMONY A  
17 FEW MINUTES AGO, IF I HEARD YOU CORRECTLY, THAT YOU WERE ASKED  
18 TO PROVIDE AND DID PROVIDE DOCUMENTS.

19 WHO ASKED YOU TO PROVIDE DOCUMENTS?

20 A THE LETTER OF THE CONGRESSMAN DORNAN ASKED ME  
21 TO PROVIDE SOME DOCUMENTS.

22 Q WHICH DOCUMENTS?

23 A I CAN'T REMEMBER EXACTLY WHAT KIND OF  
24 DOCUMENT --

25 Q THESE --

26 A -- SPECIFICALLY.

1 Q -- LETTERS WEREN'T ADDRESSED TO YOU, WERE THEY?

2 A SOME DOCUMENT, YES, AND I DID PROVIDE THOSE  
3 DOCUMENT THAT HE ASK.

4 Q AND HAVE YOU BEEN ABLE TO PRODUCE TO US ANY  
5 DOCUMENTS YOU PRODUCED TO THE CONGRESSMAN IN RESPONSE?

6 A I THINK THAT YOU CAN GET IT FROM CONGRESSMAN  
7 DORNAN.

8 Q YOU HAVEN'T BEEN ABLE TO COME UP WITH ANY  
9 DOCUMENTS AT ALL SUPPORTING THIS CONTENTION; RIGHT?

10 A THE CONGRESSMAN ASK ME, AND THEN I DID PROVIDE  
11 THEM. THAT'S IT.

12 Q WELL, AS TO THESE LETTERS, YOU WERE EVEN JUST  
13 TESTIFYING NOW THAT YOU WEREN'T SURE IF YOU READ THE LETTERS  
14 AT THE TIME.

15 SO IF YOU HADN'T EVEN READ THE LETTER AT THE  
16 TIME, YOU SAID YOU DIDN'T GET THE APRIL 30, 1996 LETTER, HOW  
17 COULD YOU HAVE RESPONDED TO SOMETHING YOU DIDN'T GET?

18 A I READ THE LETTER. OKAY. AND THEN SO I TOLD  
19 MY STAFF THAT: OKAY. JUST SEND THEM THESE DOCUMENTS.

20 Q SO WHEN YOU EARLIER SAID THAT YOU DIDN'T GET  
21 THE LETTER, ARE YOU NOW SAYING YOU DID?

22 MR. HART: OBJECTION. VAGUE AND AMBIGUOUS.

23 THE COURT: WAIT, PLEASE.

24 SUSTAINED.

25 WHY DON'T WE GO AHEAD -- IT'S ABOUT TIME FOR  
26 OUR BREAK ANYWAY. WHY DON'T WE GO AHEAD AND TAKE OUR

1 15-MINUTE BREAK. BE BACK AT TEN AFTER. THEN WE'LL PICK UP  
2 FOR THE LAST SESSION OF THE DAY.

3 (JURY EXCUSED FOR LUNCH.)

4 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT OUTSIDE THE  
5 PRESENCE OF THE JURY:)

6 THE COURT: ANYTHING WE NEED TO TALK ABOUT WITH THESE  
7 OTHER LETTERS OR ANYTHING?

8 MR. HART: NO, NOT FROM ME.

9 THE COURT: HAVE YOU READ THIS WHOLE LETTER?

10 MR. HART: NO. AND I DON'T INTEND TO HAVE HIM READ  
11 THE WHOLE LETTER. THERE'S PLENTY OF STUFF IN THERE.

12 THE COURT: ALL RIGHT. VERY GOOD. THEN WE WILL  
13 CONTINUE ON AT TEN AFTER, AND WE WILL GO FROM THERE.

14 (AFTERNOON RECESS.)

15 (THE FOLLING PROCEEDINGS WERE HELD OUTSIDE THE PRESENCE OF THE  
16 JURY:)

17 THE COURT: WE ARE BACK HERE ON KHOA V. THANG OUTSIDE  
18 THE PRESENCE OF THE JURY. WHERE ARE WE LOOKING, DO WE THINK,  
19 TIMING-WISE HERE?

20 MR. VOSS: I HAVE A FEW QUESTIONS LEFT OF THIS  
21 WITNESS. AND THEN I HAVE SOME QUESTIONING TO DO WITH  
22 DR. THANG ON CASE-IN-CHIEF. BUT WE ARE NOT -- AS YOU HEARD  
23 EARLIER, WE ARE NOT CALLING ANYBODY ELSE ON CASE-IN-CHIEF.  
24 THIS IS DISPOSING OF EVERYTHING WITH THIS WITNESS, CALLING  
25 HIM, AND THEN I'M DONE.

26 THE COURT: PLAINTIFF WILL REST AFTER WE'RE DONE WITH

1 HIS TESTIMONY?

2 MR. HART: SUBJECT TO ANY POTENTIAL REBUTTAL BASED  
3 ON --

4 THE COURT: NO. REST CASE-IN-CHIEF?

5 MR. HART: YES, JUDGE.

6 THE COURT: JUST TRYING TO GET TIME-WISE.

7 WE'LL DEFINITELY FINISH UP HERE TODAY AND AT  
8 LEAST PUT A DENT IN DEFENDANT.

9 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT IN THE  
10 PRESENCE OF THE JURY:)

11 THE COURT: WE HAVE BEEN REJOINED BY ALL OF OUR  
12 JURORS.

13 MR. VOSS, YOU MAY JUMP RIGHT BACK IN.

14 MR. VOSS: THANK YOU, YOUR HONOR.

15 BY MR. VOSS:

16 Q MR. KHOA, WITH RESPECT TO THE VIDEO, YOU WERE  
17 ASKED ABOUT WHETHER YOUR WORK, AND I USE THAT PHRASE QUOTING  
18 IT, IS MENTIONED IN THE VIDEO.

19 ISN'T IT TRUE THAT THERE IS NO REFERENCE TO  
20 DR. KHOA -- EXCUSE ME, MR. KHOA, DR. KHOA, S.E.A.R.A.C. OR  
21 I.R.A.C. IN THE VIDEO, NO MENTION AT ALL?

22 A NO MENTION AT ALL.

23 Q OKAY. AND YOU THINK THAT CONGRESSMAN SMITH IS  
24 WRONG IN WHAT HE SAYS; RIGHT?

25 A HE'S WRONG.

26 Q BUT THERE'S NOTHING IN THE VIDEO THAT MY



1 CLIENTS SAY ANYTHING AT ALL? THAT'S RIGHT; RIGHT?

2 A NO.

3 (REPORTER ASKS FOR CLARIFICATION.)

4 THE COURT: COULD YOU REPEAT YOUR ANSWER, PLEASE,  
5 SIR.

6 THE WITNESS: NO.

7 BY MR. VOSS:

8 Q SO YOUR WORK ISN'T SPECIFICALLY REFERRED TO,  
9 AND MY CLIENTS SAY NOTHING ON THE VIDEO, JUST SO WE'RE CLEAR;  
10 ISN'T THAT CORRECT?

11 A I DON'T UNDERSTAND THIS QUESTION.

12 Q ALL RIGHT. THIS VIDEO THAT YOU SAW --

13 A SO YOU'RE CLEAR. CLEAR WHAT?

14 THE COURT: MR. KHOA, HE'S GOING TO RESTATE IT. YOU  
15 SAID YOU DIDN'T UNDERSTAND, SO HE'S GOING TO TRY AND REPHRASE  
16 IT FOR YOU.

17 BY MR. VOSS:

18 Q THERE'S NOTHING IN THAT VIDEO THAT MY CLIENTS  
19 DID, IS THERE?

20 A NO, NOTHING.

21 Q THEN YOU WERE ASKED SOME QUESTIONS ABOUT  
22 COMPETING APPLICANTS THAT THE CONGRESSMAN REFERRED TO IN  
23 EXHIBIT 234.

24 AGAIN, DID MY CLIENT SAY ANYTHING ABOUT  
25 COMPETING APPLICANTS AS PART OF THE STATEMENT THAT YOU CLAIM  
26 TO BE DEFAMATORY?

1           A           I DON'T SEE ANYTHING ABOUT COMPETITION SAID BY  
2 CONGRESSMAN DORNAN OR DR. THANG.

3           Q           WELL, CONGRESSMAN DORNAN MENTIONED IT, BUT MY  
4 CLIENTS DIDN'T SAY ANYTHING ABOUT COMPETING APPLICANTS; DID  
5 THEY?

6           A           DEFAMATORY STATEMENT IS NOT ABOUT COMPETING --

7           Q           OKAY.

8           A           -- BUT ABOUT --

9           Q           AND YOU WOULD HAVE NO WAY TO KNOW IF SOMEBODY  
10 WAS COMPETING WITH YOU ANYWAY; WOULD YOU?

11                        STRIKE THAT?

12                        YOUR ATTORNEY REFERRED TO IT AS A BLIND  
13 PROCESS. YOU DON'T KNOW IF SOMEONE ELSE IS APPLYING; DO YOU?

14           A           WE KNOW ABOUT US. WE APPLY FOR THE GRANT. AND  
15 WE -- YEAH, AND WE KNOW THAT THERE ARE PEOPLE, OTHER PEOPLE.

16           Q           OKAY. BUT BECAUSE IT'S A BLIND PROCESS --  
17 THE COURT: WAIT.

18           MR. HART: HOLD ON. I NEED TO HEAR THAT ANSWER BACK,  
19 PLEASE.

20           THE COURT: WELL, MADAM COURT REPORTER, CAN YOU READ  
21 BACK THE LAST RESPONSE, PLEASE.

22                                (RECORD READ.)

23           MR. HART: THANK YOU.

24 BY MR. VOSS:

25           Q           HOW DO YOU KNOW THERE ARE OTHER PEOPLE IF IT'S  
26 A BLIND PROCESS?

1           A           I DON'T KNOW EXACTLY WHICH AGENCY OR THE NAME  
2 OF THE AGENCY, BUT I KNOW THAT THERE ARE AGENCIES WHO APPLY  
3 FOR THESE, TOO, BUT I DON'T KNOW WHICH ONE.

4           Q           HOW DO YOU KNOW THAT? ARE YOU JUST GUESSING?

5           A           IT'S NOT A KIND OF COMPETITION, BECAUSE EACH  
6 PLAN HAS A DIFFERENT PLAN.

7           Q           YOU DON'T SEE THE APPLICATIONS OF ANYBODY ELSE,  
8 DO YOU, IN THE PROCESS?

9           A           NO, I DON'T SEE ANY APPLICATION, ANY OTHER  
10 APPLICATION.

11          Q           SO ARE YOU JUST GUESSING AGAIN WHEN YOU SAY  
12 THAT?

13          MR. HART:   OBJECTION.

14          THE WITNESS: REGARDING THIS --

15          THE COURT:   WAIT, MR. KHOA. YOUR ATTORNEY HAS AN  
16 OBJECTION.

17          MR. HART:   FORM OF THE QUESTION.

18          THE COURT:   REPHRASE THAT ONE.

19          MR. VOSS:   LET ME JUST WITHDRAW THE QUESTION.

20 BY MR. VOSS:

21          Q           MR. KHOA --

22          A           OKAY.

23          Q           THERE'S NO QUESTION PENDING. I WITHDREW THE  
24 QUESTION.

25                       WITH RESPECT TO THE ACCURACY OF THE GRANT  
26 APPLICATIONS, YOU WERE ASKED WHETHER YOU DID EVERYTHING IN

1 YOUR POWER TO MAKE SURE THERE WERE NO MISTAKES; RIGHT?

2 A SURE.

3 Q WAS IT WITHIN --

4 A I WANT TO MAKE SURE WHAT I DID IS RIGHT AND  
5 ACCURATE.

6 Q WAS IT WITHIN YOUR POWER TO HAVE, ON YOUR  
7 RESUME, MADE SOME NOTATION TO INDICATE THAT YOUR DOCTORAL  
8 DEGREE WAS NOT COMPLETE?

9 A THERE'S NO RELATIONSHIP BETWEEN THE APPLICATION  
10 AND MY DEGREE. IT'S NOT REQUIRED. AND I AM NOT SUPPOSED  
11 TO --

12 Q ISN'T IS IT REQUIRED THAT YOU BE ACCURATE?

13 A YES.

14 Q ISN'T THIS THE CRUX OF THE ISSUE; THAT YOU PUT  
15 DOWN DOCTORAL THESIS 1960, A SPECIFIC DATE, AND YOU DIDN'T  
16 HAVE A DOCTORAL THESIS AT THAT POINT; RIGHT?

17 A YES, THAT'S THE DATE THAT I -- THAT MY -- I WAS  
18 WORKING ON THE -- ON THE THESIS.

19 Q IT'S THE DATE YOU STARTED; RIGHT?

20 A I WAS WORKING ON THAT.

21 Q IT'S THE DATE YOU STARTED; RIGHT?

22 A YES.

23 Q AND IT'S NOW 1996, GIVE OR TAKE. 36 YEARS HAVE  
24 GONE BY. AND SO YOU THINK THAT IT'S ACCURATE AND NOT A  
25 MISCHARACTERIZATION THAT, WHAT, YOU'RE STILL WORKING ON IT  
26 36 YEARS LATER? IS THAT RIGHT?

1           A           WHY -- WHY YOU CALL IT A MISCHARACTERIZATION IF  
2 I SAID THAT IN 1960 I WAS WORKING ON THAT?

3           Q           IN 1996, YOU WERE NO LONGER WORKING TO COMPLETE  
4 ANY DEGREE AT THE SORBONNE IN FRANCE; ISN'T THAT CORRECT?

5           A           IN 1996? I COMMIT TO DO THAT -- IF -- WHY?  
6 BECAUSE IN 1990 -- LET'S SEE, YEAH, IN 1995, I HAVE BEEN  
7 PROMOTED TO ASSOCIATE PROFESSOR IN VIETNAM ALREADY. I DON'T  
8 NEED TO --

9           MR. VOSS: OBJECTION. MOVE TO STRIKE AS  
10 NONRESPONSIVE.

11          MR. HART: I OBJECT TO THAT.

12          THE COURT: WAIT. EVERYBODY JUST STAND DOWN FOR A  
13 MOMENT.

14                       DENIED.

15                       YOU MAY FINISH YOUR ANSWER, SIR.

16 BY MR. VOSS:

17          Q           DO YOU HAVE SOMETHING MORE YOU'D LIKE TO SAY?

18          A           (NO AUDIBLE RESPONSE.)

19          Q           MR. VOSS: MAY I PROCEED?

20          A           LET ME CLEAR UP ABOUT THE DATE. 1960, I WAS  
21 WORKING ON THAT. AND I RETURN TO VIETNAM IN 1961, AND I WAS  
22 APPOINTED TO TEACH AT THE FACULTY AS LECTURER. AND THEN A FEW  
23 YEARS LATER, I WAS PROMOTED TO ASSOCIATE DIRECTOR.

24                       AND, THEN, EVEN AT THAT TIME, I WAS ALMOST  
25 DONE, ALMOST FINISHED MY THESIS IN VIETNAM, BECAUSE OF THE  
26 WORK BETWEEN RESEARCH OF MATERIAL, VERY OLD MATERIALS, THAT'S

1 DIFFICULT. AND THEN IT TAKES SOME MORE TIME TO DO TRANSLATION  
2 INTO FRENCH. SO THAT'S WHY IT TAKES A FEW YEARS.

3 AND THEN A DIPLOMATIC INCIDENT BETWEEN VIETNAM  
4 AND FRANCE, THAT INCIDENT, THE TERO (PHONETIC), AND AT THAT  
5 TIME, I DON'T NEED TO GO TO FRANCE ANYMORE FOR TWO REASONS.

6 NUMBER ONE, I HAVE BEEN PROMOTED TO ASSOCIATE  
7 PROFESSOR, FROM LECTURER TO ASSOCIATE PROFESSOR.

8 AND THEN, NUMBER TWO, YEAH, EVEN IF I GO TO  
9 FRANCE TO SUBMIT MY THESIS AND I COME BACK, I WILL START WITH  
10 ASSOCIATE PROFESSOR. SO THEY DON'T NEED IT.

11 NUMBER THREE IS THAT I -- AT THAT TIME, I  
12 PLAN -- I ALREADY HAD MY PLAN TO AMERICANIZE THE EDUCATION,  
13 THE UNIVERSITY EDUCATION SYSTEM IN VIETNAMESE.

14 THE COURT: MR. KHOA, MR. KHOA, WE'RE GETTING FAR  
15 AFIELD OF THE CALL OF THE QUESTION ON THAT ONE AT THIS POINT  
16 IN TIME.

17 BY MR. VOSS:

18 Q IN 1975, WHEN YOU LEFT SAIGON, WHATEVER THE  
19 STATUS WAS OF YOUR THESIS, IT WAS TRAGICALLY LOST; RIGHT?

20 A YEAH, IT'S ALMOST FINISHED.

21 Q BUT IT WAS GONE AND NOTHING FURTHER WAS EVER  
22 SUBMITTED TO THE SORBONNE; ISN'T THAT CORRECT?

23 A (NO AUDIBLE RESPONSE.)

24 Q I AM CORRECT; RIGHT?

25 A IT'S WRITTEN BY HAND. YOU KNOW, THERE WAS NO  
26 COMPUTER AT THAT TIME.

1 Q SO ONCE IT WAS LOST, NOTHING WAS EVER SUBMITTED  
2 TO COMPLETE YOUR THESIS WITH THE SORBONNE; YOU AGREE?

3 A I DON'T NEED TO ANYMORE. AS I SAID, I WAS  
4 ALREADY PROMOTED --

5 THE COURT: MR. KHOA, MR. KHOA, THAT'S NOT THE  
6 QUESTION.

7 BY MR. VOSS:

8 Q NOTHING FURTHER FROM 19 -- WELL, CERTAINLY  
9 AFTER 1975, WHEN YOUR HANDWRITTEN NOTES WERE LOST, AT NO TIME  
10 AFTER THAT DATE DID YOU EVER SUBMIT A SINGLE PAGE TO THE  
11 SORBONNE TO SUPPORT THE COMPLETION OF YOUR DOCTORAL DEGREE,  
12 DID YOU?

13 A NO, I SENT NOTHING TO SORBONNE ANYMORE.

14 MR. VOSS: NOTHING FURTHER, YOUR HONOR.

15 THE COURT: ALL RIGHT. MAY THE WITNESS STEP DOWN?

16 MR. HART: SORRY, JUDGE. I'M LOOKING TO SEE IF THERE  
17 IS ONE MORE PLACE TO BEAT THIS DEAD HORSE. I THINK MAYBE NOT.

18 THE COURT: ALL RIGHT. THEN CAN WE HAVE SOME  
19 ASSISTANCE FOR HIM TO STEP DOWN?

20 WE'LL GIVE YOU A MOMENT, SIR. THANK YOU VERY  
21 MUCH, MR. KHOA.

22 ALL RIGHT. THEN I'LL TURN TO MR. HART. DO WE  
23 HAVE ANYTHING FURTHER FROM PLAINTIFF?

24 MR. HART: NO, YOUR HONOR. PLAINTIFF RESTS.

25 THE COURT: ALL RIGHT. THANK YOU VERY MUCH.

26 THEN THAT TURNS US TO DEFENDANT.

1 MR. VOSS: YES, YOUR HONOR. DEFENSE CALLS DR. NGUYEN  
2 DINH THANG.

3 THE COURT: ALL RIGHT. THANK YOU VERY MUCH.

4 COME AROUND AT THE END OF THE TABLE. WE'LL  
5 SWEAR YOU IN AGAIN, MR. THANG. IT'S BEEN A FEW DAYS NOW.

6 MR. VOSS: IT'S DR. THANG.

7 NGUYEN DINH THANG,  
8 CALLED AS A WITNESS ON BEHALF OF THE DEFENDANTS, AND HAVING  
9 BEEN FIRST DULY SWORN, WAS EXAMINED AND TESTIFIED AS FOLLOWS:

10 THE WITNESS: I DO.

11 THE CLERK: PLEASE STATE AND SPELL YOUR FIRST AND  
12 LAST NAME FOR THE RECORD.

13 THE WITNESS: THANG, T-H-A-N-G, DINH, D-I-N-H,  
14 NGUYEN, N-G-U-Y-E-N.

15 THE CLERK: THANK YOU. YOU MAY BE SEATED.

16 THE COURT: THANK YOU VERY MUCH, DOCTOR. WE'LL GIVE  
17 YOU A MOMENT TO SETTLE IN THERE. THERE IS STILL A NOTEPAD UP  
18 HERE.

19 DIRECT EXAMINATION

20 BY MR. VOSS:

21 Q DR. THANG, CAN YOU TELL US WHAT YOUR HIGHEST  
22 LEVEL OF EDUCATION IS.

23 A YES. I GOT A PH.D. IN MECHANICAL ENGINEERING  
24 FROM VIRGINIA TECH IN 1986.

25 Q WHEN DID YOU OBTAIN THAT DEGREE?

26 A IN 1986.



1 Q AND WHAT IS THE EXACT TITLE ASSOCIATED WITH  
2 THAT DEGREE?

3 A CAN YOU REPEAT THAT?

4 Q WHAT TITLE IS ASSOCIATED WITH YOUR HIGHEST  
5 DEGREE?

6 A OH, IT'S A PH.D. IN MECHANICAL ENGINEERING.

7 Q AND WHERE DID YOU OBTAIN THIS DEGREE?

8 A FROM VIRGINIA TECH.

9 Q AS PART OF GETTING YOUR PH.D., WHAT WERE THE  
10 REQUIREMENTS?

11 A THE REQUIREMENT IS TO COMPLETE THE COURSE WORK,  
12 THE REQUIRED COURSE WORK, AND SELECT A TOPIC TO DO RESEARCH  
13 ON.

14 AND AT THE COMPLETION OF THE RESEARCH, I WOULD  
15 NEED TO WRITE A THESIS, AND THEN DEFEND IT BEFORE A PANEL OF  
16 PROFESSORS.

17 Q SO IN ADDITION TO JUST WRITING A THESIS, WHAT  
18 WAS INVOLVED IN DEFENDING IT?

19 A "DEFENDING IT" MEANS BEING IN FRONT OF THREE  
20 PROFESSORS, ANSWERING QUESTIONS ABOUT THE TECHNIQUE, THE  
21 METHODOLOGY. THEY HAVE A LOT OF QUESTIONS, AND I HAD TO  
22 ANSWER ALL THOSE QUESTIONS SATISFACTORILY.

23 Q WHEN YOU SAY "SATISFACTORILY," DID THEY TAKE A  
24 VOTE OR HOW DO THEY --

25 A OH, YES. OH, YES. SO THERE ARE THREE OF THEM,  
26 SO TWO OF THEM MUST VOTE FOR THE MAJORITY FOR ME TO BE

1 RECOGNIZED AS A PH.D.

2 Q ALL RIGHT. CAN YOU TELL US -- IN ADDITION TO  
3 YOURSELF AS AN INDIVIDUAL DEFENDANT HERE TODAY, THERE IS ALSO  
4 A DEFENDANT CALLED BOAT PEOPLE S.O.S., INC.

5 WHAT IS BOAT PEOPLE S.O.S., INC.?

6 A BOAT PEOPLE S.O.S. WAS FOUNDED IN 1980 BY  
7 PROFESSORS AT UC SAN DIEGO. AND AT THE SAME TIME, THERE'S A  
8 SPLIT BOARD OF DIRECTORS; HALF OF THEM ARE PROFESSORS,  
9 ACADEMICS, IN SAN DIEGO, AND THE OTHER HALF ARE -- WERE BOAT  
10 PEOPLE WHO WERE VICTIMS OF PIRATES' ATTACK IN CAMPS IN  
11 THAILAND. SO THE TWO GROUPS CAME TOGETHER TO FORM BOAT PEOPLE  
12 S.O.S.

13 Q AND WHERE DID YOU BECOME INVOLVED, PHYSICALLY?

14 A I WAS A BOAT PERSON MYSELF, ESCAPING FROM  
15 VIETNAM WITH MY PARENTS AND MY TWO YOUNGER SIBLINGS IN 1978.  
16 SO AFTER I GOT MY PH.D., I JOINED THE NAVY AS A CIVILIAN  
17 EMPLOYEE WORKING AS A RESEARCH ENGINEER.

18 AND IN 1988, WHEN THERE WAS CRISIS OF THE BOAT  
19 PEOPLE, THEY WERE PUSHED BACK TO SEA BY COUNTRIES IN THE  
20 REGION, THAT'S WHERE I VOLUNTEER MYSELF. I HAD TO DO  
21 SOMETHING FOR THOSE WHO ARE LESS FORTUNATE.

22 Q AND DID THEIR COME A POINT IN TIME THAT YOU  
23 BECAME FULL-TIME WITH THE BOAT PEOPLE?

24 A YEAH. IN 2001, I RESIGNED FROM MY ENGINEERING  
25 CAREER AND WORK FULL-TIME FOR BOAT PEOPLE S.O.S.

26 Q SINCE BECOMING FULL-TIME WITH, I'LL CALL IT,

1 B.P.S.O.S., WHAT POSITIONS HAVE YOU HELD?

2 A IN 1991, I WAS ALREADY EXECUTIVE DIRECTOR, BUT  
3 TOTALLY ON A VOLUNTARY BASIS. I STILL WORK AT THE RESEARCH  
4 LAB FOR THE NAVY.

5 IN 2001, I USE SOME OF MY PERSONAL SAVINGS TO  
6 PAY FOR MYSELF AND ONE HALF-TIME STAFF TO WORK STILL AS AN  
7 ACTIVE DIRECTOR BUT STAFF PAYING.

8 Q SO IS IT CORRECT TO SAY THAT, AT THAT TIME,  
9 B.P.S.O.S. DID NOT HAVE ANY GRANT MONEY?

10 A NO, NOT UNTIL MUCH LATER.

11 Q AND HAS YOUR JOB TITLE CHANGED OVER TIME?

12 A YES. YEARS LATER WE ESTABLISHED BRANCHES IN  
13 DIFFERENT CITIES WHERE THERE'S A LOT OF REFUGEES AND  
14 IMMIGRANTS, COMING TO SERVE THEIR NEEDS. SO EACH BRANCH, BY  
15 THAT TIME, HAD AN EXECUTIVE DIRECTOR. THAT'S WHY I WAS  
16 PROMOTED TO CEO.

17 Q SINCE BECOMING FULL-TIME WITH B.P.S.O.S., HAVE  
18 YOU HAD ANY OTHER EMPLOYMENT?

19 A NO.

20 Q IS YOUR CREDIBILITY IMPORTANT IN THE WORK YOU  
21 DO WITH B.P.S.O.S.?

22 A VERY MUCH, BECAUSE 90 PERCENT OF OUR BUDGET FOR  
23 INTERNATIONAL CORPORATIONS CAME FROM DONATIONS, SMALL  
24 DONATIONS, FROM A LOT OF MEMBERS OF THE COMMUNITY. MANY OF  
25 THEM WERE OUR FORMER CLIENTS THAT WE HELP, FORMER BOAT PEOPLE,  
26 FORMER REFUGEES.

1 Q WHEN YOU SAY 90 PERCENT WAS FROM SMALL  
2 DONATIONS FROM "THE COMMUNITY," WAS THAT FOR -- THE VAST  
3 MAJORITY OF IT FROM THE VIETNAMESE COMMUNITY --

4 A CORRECT.

5 Q -- IN THE U.S.?

6 A YES, CORRECT. IN THE U.S. -- IN THE DIASPORA  
7 IN THE U.S.

8 Q WHAT IS A "DIASPORA"?

9 A MEANING, THOSE WERE NO LONGER IN VIETNAM.

10 Q SO VIETNAMESE PEOPLE WHO HAVE BEEN DISPLACED OR  
11 ARE NOW LIVING SOMEWHERE ELSE IS THE VIETNAMESE DIASPORA?

12 A THAT'S RIGHT, IN THE U.S.

13 MAY I PAUSE AND HAVE SOME WATER, PLEASE?

14 Q YES, PLEASE.

15 A THANK YOU.

16 Q LOOKING AT THE STATEMENT WRITTEN ON THE BOARD  
17 THERE, IS IT CORRECT TO SAY THAT ONLY THE LAST FIVE WORDS ARE  
18 YOURS?

19 A THAT'S CORRECT.

20 Q WHERE DID THE FIRST PART OF THE STATEMENT COME  
21 FROM?

22 A THE FIRST PART OF THE STATEMENT CAME PRIMARILY  
23 FROM DORNAN'S LETTER DATED APRIL 30, 1996, AND ALSO WITH THE  
24 BACKGROUND OF HIS LETTER DATED APRIL 2ND, 1996.

25 Q AND WERE YOU LOOKING AT THOSE LETTERS WHEN YOU  
26 DRAFTED YOUR ARTICLE IN 2020?

1           A           YES.  AFTER RECEIVING -- READING THE ARTICLE BY  
2 MR. KHOA, I WENT TO OFFICE, LOOK UP INTO OUR ARCHIVES, PULLED  
3 OUT A BIG BOX, AND I READ MANY ARTICLES.  I LAID THEM OUT AND  
4 START WRITING MY RESPONSE.

5           Q           WITH RESPECT TO THE ARTICLE BY MR. KHOA TO  
6 WHICH YOU RESPONDED, WAS YOUR MOTIVATION -- TELL US YOUR  
7 MOTIVATION FOR AUTHORIZING THAT ARTICLE.

8           A           WELL --

9           MR. HART:  OBJECTION.  IT'S UNCLEAR WHICH ARTICLE  
10 WE'RE TALKING ABOUT.

11          MR. VOSS:  HIS ARTICLE RESPONDING TO --

12          THE COURT:  WHY DON'T YOU JUST -- GIVEN THE RECORD,  
13 WHY DON'T YOU RESTATE THE QUESTION SO THAT THERE'S NO --  
14 BY MR. VOSS:

15          Q           IN THIS ARTICLE THAT YOU JUST SAID WAS  
16 RESPONDING TO MR. KHOA'S SECOND ARTICLE IN 2020, WHAT  
17 MOTIVATED YOU TO WRITE THAT ARTICLE?

18          A           WELL, IN THAT ARTICLE, MR. KHOA ACCUSED ME AND  
19 B.P.S.O.S. OF OPPOSING A LEGISLATION INTRODUCED BY CONGRESSMAN  
20 SMITH THAT WOULD BLOCK THE FORCED REPATRIATION OF THE BOAT  
21 PEOPLE --

22                       (REPORTER ASKS FOR CLARIFICATION.)

23          THE WITNESS:  -- OF THE BOAT PEOPLE, TENS OF  
24 THOUSANDS OF THEM IN CAMPS IN HONG KONG AND IN SOUTHEAST ASIA,  
25 INCLUDING MALAYSIA, THAILAND, THE PHILIPPINES, INDONESIA, AND  
26 SO ON AND SO FORTH.

1                   AND HE ACCUSED ME AND B.P.S.O.S. OF DECEIVING  
2 CONGRESSMAN SMITH; THAT WE SUPPORTED IT. BUT ACTUALLY HE ---  
3 IN HIS WRITING, THAT WE OPPOSE IT. BUT THEN WE PRESENTED TO  
4 CONGRESSMAN SMITH THAT WE SUPPORTED IT, AND, THEREFORE,  
5 CONGRESSMAN SMITH PRAISE US INCORRECTLY, WRONGLY.

6                   AND THEN HE USED THE WORD THAT MR. THANG ABUSED  
7 OR TOOK ADVANTAGE OF THE REPUTATION OF CONGRESSMAN SMITH TO  
8 FURTHER ADVANCE MY OWN PRESTIGE AND ALSO TO COLLECT MONEY FOR  
9 BOAT PEOPLE S.O.S. AND THAT WAS TOTALLY THE OPPOSITE OF WHAT  
10 HAD HAPPENED.

11 BY MR. VOSS:

12                   Q           DID HE ADDITIONALLY REFER TO YOU AS ACTING  
13 DEVIOUSLY?

14                   A           YES, DEVIOUSLY DECEIVING CONGRESSMAN SMITH, WHO  
15 WAS A GOOD FRIEND OF MINE, AND HE INTRODUCED THE LEGISLATION  
16 AT MY REQUEST.

17                   Q           SO IS IT FAIR TO SAY THAT ALL YOU WERE TRYING  
18 TO DO IN THE ARTICLE WAS TO PROTECT YOUR REPUTATION AND SET  
19 THE RECORD STRAIGHT?

20                   A           THAT'S CORRECT. BUT NOT ONLY THAT. IF I  
21 DIDN'T RESPOND SOON, THAT WOULD JEOPARDIZE OUR CAPACITY TO  
22 FUND RAISE IN COMMUNITY.

23                   Q           AND WHY WAS THAT?

24                   A           BECAUSE MANY PEOPLE WHO HAVE RECEIVED OUR  
25 SERVICE, WHO BENEFITTED FROM OUR SERVICE, OUR GOOD WORK, NOW  
26 THEY START QUESTIONING: DR. THANG, YOU LIE TO US ALL ALONG.

1 YOU LIE TO US THAT YOU HELP RESCUE THESE PEOPLE FROM BEING  
2 FORCED BACK TO VIETNAM AGAINST THEIR WILL. YOU LIE TO US THAT  
3 BECAUSE OF THE LEGISLATION OF CONGRESSMAN SMITH THAT YOU  
4 PROMOTED, THAT THESE PEOPLE HAVE TO RETURN TO VIETNAM WHEN,  
5 NOW, WE INTERVIEWED BY U.S. IMMIGRATION OFFICERS AND RESETTLED  
6 BY THE GOVERNMENT OF U.S. TO THIS COUNTRY. YOU HAVE LIED TO  
7 US.

8 Q SO YOU NEEDED TO CORRECT YOUR REPUTATION; IS  
9 THAT RIGHT?

10 A THAT'S CORRECT.

11 Q OKAY. AND YOUR NEED TO DO THAT, IF I  
12 UNDERSTAND THE SEQUENCE CORRECTLY, IN 2020, THERE'S THE VIDEO  
13 THAT CONGRESSMAN SMITH PUTS OUT THAT PRAISES YOUR WORK; ISN'T  
14 THAT RIGHT?

15 A THAT'S CORRECT.

16 Q OKAY. AND THEN AFTER THAT VIDEO COMES OUT,  
17 WE'VE HEARD MR. KHOA, THAT HE THINKS CONGRESSMAN SMITH IS  
18 WRONG, SO HE WROTE TWO ARTICLES; RIGHT?

19 A (NO AUDIBLE RESPONSE.)

20 Q WERE THOSE ARTICLES READ, TO YOUR KNOWLEDGE,  
21 THROUGHOUT -- WIDELY THROUGH THE VIETNAMESE DIASPORA?

22 A YES. HE GOT THEM PUBLISHED BY MAJOR NEWS  
23 OUTLETS, INCLUDING VOICE OF AMERICA, WHICH IS THE OFFICIAL  
24 ORGAN OF THE DEPARTMENT OF STATE, SO IT HAD SOME APPEARANCE OF  
25 BEING OFFICIAL.

26 Q SO BECAUSE OF HIS STATUS IN THE VIETNAMESE

1 COMMUNITY, LOTS OF PEOPLE HEARD WHAT HE HAD TO SAY?

2 A DEFINITELY. AND NEWS OUTLET, MAJOR NEWS  
3 OUTLETS CARRIED HIS ARTICLES.

4 Q SO THEN WE COME BACK TO THE STATEMENT AT ISSUE.  
5 THE FIRST PART IS BASED PRIMARILY ON THE  
6 CONGRESSMAN, YOU SAID.

7 THE SECOND PART, "THAT WAS A CRIMINAL OFFENSE,"  
8 HAVE YOU HAD ANY INVOLVEMENT YOURSELF IN THE APPLICATION  
9 PROCESS FOR FEDERAL GRANTS?

10 A YES, SINCE 2005.

11 Q AND CAN YOU TELL ME -- STRIKE THAT.

12 ARE YOU FAMILIAR WITH THE PROCESS AND  
13 REQUIREMENTS ASSOCIATED WITH APPLYING FOR A GRANT FROM THE  
14 FEDERAL GOVERNMENT?

15 A YES, VERY MUCH, BECAUSE SINCE '05, I HAVE  
16 WRITTEN OR REVIEWED PROBABLY ABOUT A HUNDRED GRANT PROPOSALS  
17 TO FEDERAL GOVERNMENT AGENCIES.

18 Q BASED ON YOUR EXPERIENCE, IS THE ACCURACY OF  
19 THE INFORMATION CONTAINED IN FEDERAL GRANT APPLICATIONS AN  
20 IMPORTANT COMPONENT OF THOSE APPLICATIONS?

21 A ABSOLUTELY. BEFORE WE START WRITING THE GRANT  
22 PROPOSAL, WE NEED TO READ INSTRUCTIONS FROM THE GRANTING  
23 AGENCY. AND IN THERE, VERY CLEARLY, THEY STATE THAT YOU MUST  
24 BE TRUTHFUL AND HONEST. ANY FALSE STATEMENT OR FALSE CLAIMS  
25 WOULD BE IN VIOLATION OF THE FEDERAL CRIMINAL FALSE CLAIMS  
26 ACT. AND THAT WOULD BE A CRIME, EVEN IF YOU DON'T GET THE



1 FUNDING. BY JUST TELLING UNTRUTHS IN ORDER TO OBTAIN FEDERAL  
2 FUNDS, THAT WOULD BE PROSECUTABLE CRIME UNDER THE ACT.

3 Q SO BASED ON YOUR EXPERIENCE, WHO, WHEN  
4 B.P.S.O.S. SUBMITS THE GRANT APPLICATION AS THE APPLICANT, WHO  
5 IS ULTIMATELY RESPONSIBLE TO ENSURE THE ACCURACY OF THE  
6 INFORMATION CONVEYED IN THE FEDERAL GRANT APPLICATION?

7 A THE HEAD OF THE AGENCY, AND THAT IS THE  
8 EXECUTIVE DIRECTOR OR THE CEO OR THE PRESIDENT.

9 Q AND IS THAT WHY YOU ACTUALLY PUT -- AFFIX YOUR  
10 SIGNATURE TO THE VERY FIRST PAGE OF EVERY GRANT APPLICATION?

11 A YES. AND IN THERE, THERE'S ALSO A STATEMENT  
12 THAT WHEN YOU APPLY, YOU SAY THAT, YES, I HAVE READ THIS; THAT  
13 I UNDERSTAND THE INSTRUCTIONS; I COMPLY WITH THE INSTRUCTION.

14 Q BASED ON YOUR EXPERIENCE IN THESE MANY FEDERAL  
15 GRANT APPLICATIONS, ARE THE ACADEMIC QUALIFICATIONS OF THE  
16 INDIVIDUALS IDENTIFIED AS KEY PERSONNEL IN THE APPLICATION  
17 RELEVANT TO THE AWARD OF FEDERAL GRANTS?

18 MR. HART: OBJECTION. FOUNDATION.

19 THE COURT: SUSTAINED.

20 BY MR. VOSS:

21 Q YOU REFERENCED THE INSTRUCTIONS. ARE YOU  
22 REQUIRED, AS PART OF THE FEDERAL GRANT APPLICATION, TO  
23 IDENTIFY THE KEY PERSONNEL THAT WOULD BE INVOLVED IN THE  
24 PROJECT FOR WHICH YOU SEEK THE FEDERAL GRANT?

25 A ALWAYS.

26 MR. HART: OBJECTION. CALLING FOR HEARSAY.

1 THE COURT: OVERRULED.

2 THE WITNESS: YES. IN A GRANT PROPOSAL, WE NEED  
3 ALWAYS TO HAVE AN ACTION PLAN AND VERY DETAILED  
4 RESPONSIBILITIES OF THOSE WOULD BE INVOLVED IN THE GRANT, WHO  
5 WILL BE CHARGING THE SALARIES AT THE TIME OF THE GRANT, AND  
6 THAT MUST COME WITH QUALIFICATIONS OF EACH PERSON LISTED.

7 BY MR. VOSS:

8 Q OKAY. SO WAS IT YOUR UNDERSTANDING WHEN YOU  
9 SAID THAT FALSELY -- MR. KHOA'S FALSE CLAIM THAT HE HELD A  
10 DOCTORAL DEGREE IN THE APPLICATION, THAT WAS A CRIMINAL  
11 OFFENSE, THAT TO DO SO, IN YOUR MIND, BASED ON YOUR  
12 EXPERIENCE, IT WAS A CRIMINAL OFFENSE?

13 A IT IS, YES.

14 Q OKAY. LIKewise, YOU SAID YOU READ THE LETTERS  
15 FROM CONGRESSMAN DORNAN THAT RAISED CONCERNS ABOUT  
16 MISREPRESENTATION OF ACADEMIC CREDENTIALS AND THAT MR. KHOA  
17 DOES NOT HAVE A DEGREE.

18 YOU WERE READING THESE WHEN YOU WROTE THOSE  
19 WORDS; RIGHT?

20 A CORRECT.

21 Q AND IF YOU MISREPRESENTED YOUR ACADEMIC  
22 CREDENTIALS, IS IT YOUR UNDERSTANDING THAT THAT WOULD VIOLATE  
23 THE REQUIREMENTS FOR THE APPLICATION FOR THE GRANT?

24 MR. HART: I HAVE TO OBJECT, YOUR HONOR. IT'S  
25 LEADING. LEADING ON DIRECT.

26 THE COURT: IT HAS BEEN LEADING. COUNSEL, IF YOU

1 WANT TO REPHRASE.

2 BY MR. VOSS:

3 Q WHEN YOU WROTE THE WORDS, "THAT WAS A CRIMINAL  
4 OFFENSE," DID YOU BASE THAT STATEMENT, IN PART, ON YOUR  
5 READING OF THE LETTERS FROM CONGRESSMAN DORNAN?

6 A YES. BECAUSE HE WROTE TO THE INSPECTOR GENERAL  
7 OF THE DEPARTMENT OF STATE, NOT ANY OTHER OFFICE, BUT THE  
8 INSPECTOR GENERAL'S OFFICE, BECAUSE THAT'S THE ONLY OFFICE  
9 MANDATED TO INVESTIGATE POTENTIAL CRIMINAL ACT IN VIOLATION OF  
10 U.S. FEDERAL LAW OR REGULATIONS THAT GOVERN THE GRANT-MAKING  
11 PROCESS OF THAT AGENCY.

12 Q AND, DR. THANG, FINALLY, WITH RESPECT TO THE  
13 ISSUE OF WHETHER OR NOT IT WAS A CRIMINAL OFFENSE, DID YOU  
14 HAVE OCCASION TO SPEAK WITH DR. ALBERT SANTOLI?

15 A YES.

16 Q HOW IS IT YOU CAME TO SPEAK TO DR. SANTOLI?  
17 BRIEFLY, BECAUSE YOU ALREADY ADDRESSED THAT PREVIOUSLY.

18 A YES. BECAUSE I KNOW HIM, AND WE WORK CLOSELY  
19 ON BLOCKING THE FORCEABLE REPATRIATION OF BOAT PEOPLE FROM THE  
20 CAMPS. SO I VISITED HIS RESIDENCE QUITE OFTEN AND SOMETIMES  
21 HIS OFFICE ON CAPITOL HILL. SO WE EXCHANGE, AND HE KEPT ME UP  
22 TO DATE ABOUT THE ONGOING INVESTIGATION CONDUCTED BY THE  
23 OFFICE OF CONGRESSMAN DORNAN. AND HE WAS THE LEAD PERSON  
24 CONDUCTING THAT INVESTIGATION.

25 Q IS IT CORRECT TO SAY THAT WHEN YOU WERE ASKED  
26 TO VISIT DR. SANTOLI AT CONGRESSMAN DORNAN'S OFFICE, THAT IT

1 WAS HE WHO INITIATED SHOWING YOU GRANT PROPOSALS FROM  
2 I.R.A.C./S.E.A.R.A.C. WITH THE RESUME ATTACHED?

3 A THAT'S CORRECT. I HAD NO INTEREST IN THAT  
4 ISSUE. I WAS WORKING FULL-TIME, TRYING TO DEFEND THESE TENS  
5 OF THOUSANDS BOAT PEOPLE FROM BEING FORCED BACK. THAT IS AN  
6 ISSUE THAT IS NOT REALLY -- AND I DIDN'T HAVE THE TIME,  
7 ACTUALLY, REALLY ON MY AREA OF INTEREST.

8 BUT HE SHOWED THAT TO ME, THE COPIES OF THE  
9 GRANT PROPOSAL THAT HIS OFFICE RECEIVED FROM MULTIPLE  
10 DIFFERENT AGENCIES. HE ASKED WHETHER I WANT COPY OR NOT. I  
11 SAID: NO, MAYBE JUST ONE COPY OF THE C.V.

12 Q AND --

13 A AND THAT'S THE RESUMES, C.V.'S.

14 Q WHEN YOU WROTE THE WORDS IN 2020, "THAT WAS A  
15 CRIMINAL OFFENSE," WAS THAT BASED ON ALL THREE OF THESE PIECES  
16 OF INFORMATION THAT YOU HAD; YOUR EXPERIENCE WRITING GRANTS,  
17 YOUR REVIEW OF THE CONGRESSMEN'S LETTERS, AND YOUR MEETINGS  
18 AND REVIEW OF DOCUMENTS WITH DR. SANTOLI?

19 A YES. DR. SANTOLI EXPLAIN TO ME WHY HIS OFFICE  
20 WROTE TO THE OFFICE OF THE INSPECTOR GENERAL.

21 Q AT THE TIME THAT YOU MADE THAT STATEMENT, THAT  
22 ISSUE, WAS THERE, IN YOUR MIND, ANY REASON TO DISBELIEVE WHAT  
23 HAD BEEN SET FORTH BY CONGRESSMAN DORNAN IN HIS LETTERS?

24 A NO, FOR A NUMBER OF REASONS.

25 ONE IS THAT IT'S AN ONGOING VERY THOROUGH  
26 INVESTIGATION. IT'S NOT JUST A ONE-TIME THING. IT WENT ON

1 SINCE EARLY JANUARY UNTIL AT LEAST LATE APRIL 1996.

2 Q ALL OF THAT IN 1996?

3 A 1996, YES.

4 Q AT THE TIME YOU MADE THAT STATEMENT AT ISSUE,  
5 WAS IT YOUR BELIEF THAT THE INFORMATION CONVEYED BY  
6 CONGRESSMAN DORNAN IN HIS LETTERS --

7 MR. HART: OBJECTION. LEADING.

8 THE COURT: SUSTAINED.

9 BY MR. VOSS:

10 Q AT THE TIME -- AS YOU SIT HERE TODAY -- STRIKE  
11 THAT.

12 WHEN YOU MADE THAT STATEMENT, THE ONE ON THE  
13 BOARD, DID YOU BELIEVE IT TO BE A CRIMINAL OFFENSE FOR ANYONE  
14 TO MAKE A MISREPRESENTATION IN A GRANT APPLICATION?

15 MR. HART: OBJECTION. RELEVANCE.

16 THE COURT: OVERRULED.

17 THE WITNESS: I DID. AS I EXPLAINED, I, MYSELF,  
18 EXPERIENCED -- HAD THE EXPERIENCE OF WRITING GRANT PROPOSALS  
19 AND READING INSTRUCTIONS BEFORE STARTING THE GRANTING PROCESS  
20 AND BEFORE SUBMITTING.

21 MR. VOSS: NOTHING FURTHER OF THIS WITNESS.

22 THE COURT: MR. HART.

23 MR. HART: YOUR HONOR, I ASK FOR A LITTLE BIT OF  
24 CONSIDERATION HERE SINCE I DON'T HAVE MY ASSISTANT THIS  
25 AFTERNOON. I CAN DO A LITTLE BIT OF CROSS-EXAMINATION HERE,  
26 BUT I NEED THE ASSISTANCE OF THE OVERHEAD WHEN I MOVE ON.

1 SO...

2 THE COURT: WE GOT ABOUT 15 MINUTES OR SO THAT WE CAN  
3 USE HERE TODAY TO GET STARTED.

4 MR. HART: RIGHT. I'M HAPPY TO DO THAT, JUDGE. I  
5 JUST WANT TO RESERVE THE ABILITY TO DO SOME OF THIS CROSS  
6 WHEN...

7 THE COURT: GO AHEAD AND SEE WHAT WE CAN GET GOING  
8 RIGHT NOW, AND THEN WE'LL CROSS ALL THOSE BRIDGES AS THEY  
9 PRESENT THEMSELVES.

10 MR. HART: VERY GOOD. THANK YOU, JUDGE.

11 CROSS-EXAMINATION

12 BY MR. HART:

13 Q DR. THANG, YOUR LETTER OF MARCH 10, 1996, WAS  
14 COPIED TO CONGRESSMAN DORNAN; WASN'T IT?

15 MR. VOSS: OBJECTION. BEYOND THE SCOPE.

16 THE COURT: SUSTAINED.

17 BY MR. HART:

18 Q ISN'T THE REASON DR. SANTOLI HAD YOU COME INTO  
19 HIS OFFICE, SO HE COULD PROVIDE YOU WITH MATERIAL TO BE USED  
20 AGAINST S.E.A.R.A.C.?

21 MR. VOSS: OBJECTION. CALLS FOR SPECULATION.

22 THE COURT: OVERRULED. IT'S TO THE EXTENT OF HIS  
23 KNOWLEDGE.

24 THE WITNESS: NO. AS EXPLAINED, WE WORKED TOGETHER  
25 ON PREVENTING THE FORCED REPATRIATION OF TENS OF THOUSANDS  
26 BOAT PEOPLE STILL IN THE DIFFERENT CAMPS IN HONG KONG,

1 SOUTHEAST ASIA AT THE TIME, AND THAT WAS THE MAIN REASON.

2

3 BY MR. HART

4 Q WASN'T THERE, IN FACT, IN THE SPRING OF 1996, A  
5 CONFLICT BETWEEN -- POLITICALLY BETWEEN DORNAN AND THE SMITH  
6 AMENDMENT SUCH THAT -- I NEED TO FINISH MY  
7 QUESTION -- MR. KHOA WAS ON THE OPPOSITE SIDE OF THAT CONFLICT  
8 FROM MR. DORNAN?

9 MR. VOSS: OBJECTION. BEYOND THE SCOPE OF DIRECT.

10 THE COURT: OVERRULED.

11 THE WITNESS: I'M NOT SURE I UNDERSTAND YOUR  
12 QUESTION, WHO WAS ON WHICH SIDE AND WHO IS ON THE OPPOSITION.  
13 BY MR. HART:

14 Q DIDN'T YOU TELL ME THAT CONGRESSMAN DORNAN WAS  
15 VERY CONCERNED BECAUSE MR. KHOA WAS OPPOSING THE ANTI-CPA  
16 AMENDMENT AUTHORED BY CONGRESSMAN SMITH?

17 MR. VOSS: OBJECTION. RELEVANCE. 352. BEYOND THE  
18 SCOPE.

19 THE COURT: OVERRULED.

20 THE WITNESS: THAT'S CORRECT.

21 BY MR. HART:

22 Q AND MR. DORNAN WAS VERY STRONGLY SUPPORTING THE  
23 REFUGEES AS WELL. YOU TOLD ME THAT; RIGHT?

24 A THAT'S CORRECT.

25 Q ALL RIGHT. AND SO ALL OF THIS MATERIAL THAT  
26 DORNAN'S OFFICE HAD ACQUIRED FROM WHATEVER SOURCE, THEY MADE

1 AVAILABLE TO YOU; DIDN'T THEY?

2 A SOME.

3 MR. VOSS: CALLS FOR SPECULATION.

4 THE WITNESS: NOT ALL.

5 THE COURT: WAIT. WAIT.

6 OVERRULED.

7 THE WITNESS: CAN I CONTINUE TO ANSWER?

8 THE COURT: YES, YOU MAY.

9 BY MR. HART:

10 Q IF YOU HAVE MORE TO SAY, YOU MAY.

11 A THE QUESTION, AS I UNDERSTOOD IT, YOU MENTIONED  
12 "ALL." NO, SOME MATERIALS HERE AND THERE; NOT ALL THE  
13 MATERIALS.

14 Q YOU WERE CALLED INTO DR. SANTOLI'S OFFICE;  
15 CORRECT?

16 A CORRECT.

17 Q AND THE PURPOSE OF THAT MEETING WAS TO DISCUSS  
18 MATERIAL ABOUT S.E.A.R.A.C.?

19 A NO.

20 MR. VOSS: OBJECTION. MISCHARACTERIZES THE WITNESS'  
21 TESTIMONY.

22 THE COURT: OVERRULED. HE ALREADY RESPONDED.

23 MR. HART: I'D LIKE TO READ FROM THE WITNESS'  
24 DEPOSITION AT PAGE 92, LINE 22, TO PAGE 94, LINE 2.

25 THE WITNESS: MAY I HAVE A COPY?

26 THE COURT: PAGE 92, LINE 22, TO PAGE 94, LINE 2?



1 MR. HART: YES, JUDGE.

2 THE COURT: GIVE MR. VOSS A MOMENT TO READ IT, AND  
3 GIVE ME A MOMENT TO FIND IT.

4 MR. HART: ACTUALLY, FOR CONTEXT, JUDGE, I SHOULD  
5 START AT LINE 18.

6 THE COURT: SO PAGE 92, LINE 18, TO PAGE 94, LINE 2.

7 MR. HART: CORRECT.

8 MR. VOSS: NO OBJECTION, YOUR HONOR.

9 THE COURT: THEN YOU MAY READ THOSE IDENTIFIED LINES.

10 MR. HART: THANK YOU, YOUR HONOR. (AS READ:)

11 "QUESTION: DID YOU EVER MEET  
12 CONGRESSMAN DORNAN?

13 "ANSWER: YES.

14 "QUESTION: DID YOU SPEAK TO HIM?

15 "ANSWER: YES.

16 "QUESTION: AND DID YOU SPEAK TO HIM  
17 PRIOR TO APRIL OF 1996 ABOUT THE ISSUES  
18 THAT WE SEE IN THESE TWO LETTERS?

19 "ANSWER: HIS STAFF, DR. ALBERT  
20 SANTOLI, KNOW ME WELL, AND HE ASKED ME TO  
21 VISIT DORNAN'S OFFICE ONE DAY. AND HE  
22 SHOWED ME THE STACK OF PROPOSALS DELIVERED  
23 BY THE OFFICE OF REFUGEE RESETTLEMENT TO  
24 DORNAN'S OFFICE IN RESPONSE TO THIS REQUEST  
25 HERE.

26 AND THEN HE PULL OUT UNDERNEATH, AT

1 THE BACK OF THESE -- OF THOSE PROPOSALS,  
2 THE C.V., THE BIO SAYING "DR. KHOA," UNDER  
3 THE I.R.A.C. OFFICIAL LETTERHEAD -- UNDER  
4 THE LETTERHEAD OF INDOCHINA -- OF THE  
5 INDOCHINA RESOURCE ACTION CENTER. AND HE  
6 ASKED ME WHETHER I WANT A COPY OR NOT.

7 "I SAID, 'OH, GEES, IT'S TOO MUCH.'  
8 I ONLY ASKED FOR A COPY OF THE C.V. ONLY.

9 AT THAT TIME, FOR THE COPIES, THEY  
10 STILL HAVE TO BE DONE MANUALLY, ONE PAGE AT  
11 A TIME, AND THAT'S HOW.

12 "QUESTION: WHY WERE YOU ASKING, IN  
13 1996, FOR CONGRESSMAN DORNAN TO GIVE YOU  
14 THESE DOCUMENTS RELATED TO S.E.A.R.A.C. OR  
15 I.R.A.C.?

16 "ANSWER: OH, CONGRESSMAN DORNAN WAS  
17 VERY CONCERNED BECAUSE MR. KHOA WAS  
18 OPPOSING THE ANTI-CPA AMENDMENT AUTHORED BY  
19 CONGRESSMAN SMITH.

20 MR. DORNAN IS VERY STRONGLY  
21 SUPPORTING REFUGEES AS WELL. HE FOUGHT IN  
22 VIETNAM.

23 "QUESTION. OKAY. AND WHY DOES THAT  
24 MOTIVATE YOU TO BE INTERESTED IN MR. KHOA?

25 "ANSWER: NOT INTERESTED IN  
26 MR. KHOA. HE CALLED ME IN AND SAY -- SHARE

1 WITH ME SAY, 'HERE IS WHAT WE HAVE. YOU  
2 WANT A COPY?'

3 "I SAID, 'NO, MAYBE JUST THE C.V.'"

4 (DONE READING.)

5 BY MR. HART:

6 Q DR. THANG, ISN'T THIS WHOLE  
7 S.E.A.R.A.C. CAMPAIGN ESSENTIALLY POLITICALLY MOTIVATED  
8 BECAUSE PROFESSOR KHOA DIDN'T SUPPORT SOME PART OF CONGRESSMAN  
9 SMITH'S LEGISLATION?

10 MR. VOSS: OBJECTION. ARGUMENTATIVE AND RELEVANCE.

11 THE COURT: OVERRULED.

12 THE WITNESS: I'M NOT IN THE POSITION TO ANSWER ON  
13 BEHALF OF CONGRESSMAN DORNAN, BUT WHAT I TOLD YOU IS EXACTLY  
14 WHAT HAPPENED. I CAME IN TO TALK ABOUT HOW TO SAVE TENS OF  
15 THOUSANDS OF BOAT PEOPLE FROM BEING FORCIBLY REPATRIATED WITH  
16 THE ACQUIESCENCE OF OUR OWN DEPARTMENT OF STATE.

17 AND ON THE SIDELINE, DR. SANTOLI MENTION TO ME  
18 ABOUT THE ONGOING INVESTIGATION, GIVE ME SOME UPDATE AND ASK  
19 ME, "YOU WANT THIS?"

20 I SAID, "NO. JUST A COPY OF THE C.V. THAT  
21 SHOULD BE ENOUGH."

22 BY MR. HART:

23 Q HOW DID YOU GET A COPY OF THE TWO DORNAN  
24 LETTERS THAT WENT TO THE OFFICE OF REFUGEE RESETTLEMENT?

25 A I THINK -- I THINK --

26 Q THOSE WERE NOT COPIED TO YOU; WERE THEY?

1           A           I THINK, YEAH, THEY ARE THE COPIES THAT HE GAVE  
2 TO ME PROBABLY AT HIS HOME OFFICE.

3           Q           WHO GAVE THESE LETTERS TO YOU?

4           A           DR. SANTOLI.

5           Q           AT HIS HOME OFFICE IN VIRGINIA?

6           A           YES.

7           Q           SO EVEN THOUGH YOUR NAME DOESN'T APPEAR  
8 ANYWHERE ON THESE LETTERS, DR. SANTOLI GAVE YOU COPIES OF  
9 THESE?

10          A           CORRECT.

11          Q           AND WHAT DID YOU DO WITH THEM?

12          A           NOTHING. HE ACTUALLY GAVE COPIES OF THOSE TO A  
13 LOT OF PEOPLE THAT HE KNEW, NOT JUST ME, IN THE COMMUNITY.

14          Q           OKAY. COPIES OF THESE LETTERS NOT SO QUIETLY  
15 DISPARAGING S.E.A.R.A.C. AND MR. KHOA?

16                   MR. VOSS: OBJECTION. ARGUMENTATIVE.

17                   THE COURT: WAIT. NOW.

18                   MR. VOSS: OBJECTION. THE FORM OF THE QUESTION IS  
19 ARGUMENTATIVE.

20                   THE COURT: SUSTAINED.

21 BY MR. HART:

22          Q           DR. THANG, TAKE A LOOK AT THE APRIL 3, 1996  
23 LETTER. IT'S EXHIBIT 34.

24                                IN THE FIRST PARAGRAPH, IT SAYS: "BEGINNING IN  
25 JANUARY OF 1996, I RECEIVED AN OVERWHELMING NUMBER OF  
26 TELEPHONE CALLS AND LETTERS FROM RESPECTED VIETNAMESE-AMERICAN

1 LEADERS IN MY DISTRICT."

2 DO YOU UNDERSTAND THAT DISTRICT TO BE ORANGE  
3 COUNTY?

4 A YES.

5 Q DO YOU KNOW WHO ANY OF THESE PEOPLE ARE?

6 A NO.

7 Q ISN'T ONE OF THEM YOU?

8 A NO. FIRST, I WAS NOT IN ORANGE COUNTY.

9 SECONDLY, I WAS NOT VIETNAMESE-AMERICAN LEADER  
10 OF THE COMMUNITY. I WAS STILL WORKING AS A YOUNG PH.D. IN A  
11 RESEARCH LAB.

12 Q BUT AFTER JANUARY OF 1996, YOU SENT THIS SEVEN-  
13 OR EIGHT-PAGE LETTER COPIED TO CONGRESSMAN DORNAN; DIDN'T YOU?

14 A AS EXPLAINED, IT WAS DRAFTED BY OUR LATE BOARD  
15 CHAIR. I WAS NOT ATTUNE TO ANY OF THE ISSUES OF THE  
16 COMMUNITY. AND THAT'S NOT HOW I WROTE MY ENGLISH.

17 Q WOULD YOU AGREE THAT THIS EXHIBIT 18, YOUR  
18 MARCH 10, 1996 LETTER, HAS SEVERAL CRITICISMS OF  
19 S.E.A.R.A.C. AND MR. KHOA?

20 A THAT'S CORRECT.

21 MR. VOSS: OBJECTION. BEYOND THE SCOPE OF DIRECT.

22 THE COURT: WHY DON'T WE DO THIS, THERE'S A COUPLE  
23 QUESTIONS I HAVE. SO WE'RE NEAR THE END OF THE DAY ANYWAY.

24 SO, LADIES AND GENTLEMEN, WE'RE GOING TO GO  
25 AHEAD AND WE WILL PAUSE. WE'RE ACTUALLY MAKING QUITE GOOD  
26 PROGRESS AT THIS POINT.

1                   SO I WILL REMIND YOU OF THE ADMONITION THAT IT  
2 IS YOUR DUTY NOT TO CONDUCT, RESEARCH, DISSEMINATE INFORMATION  
3 OR CONVERSE WITH OR PERMIT YOURSELVES TO BE ADDRESSED BY ANY  
4 OTHER PERSON ON ANY SUBJECT OF TRIAL; THAT IS YOUR DUTY NOT TO  
5 FORM OR EXPRESS AN OPINION THEREON UNTIL THE CASE IS FINALLY  
6 SUBMITTED TO YOU.

7                   THE PROHIBITION ON RESEARCH, DISSEMINATION OF  
8 INFORMATION AND CONVERSATION APPLIES TO ALL FORMS OF  
9 ELECTRONIC AND WIRELESS COMMUNICATION.

10                  WITH THAT, WE WILL SEE EVERYBODY TOMORROW FOR  
11 OUR LAST DAY THIS WEEK, 9:00 A.M. THANK YOU AGAIN VERY, VERY  
12 KINDLY FOR ALL OF YOUR TIME THAT YOU'RE PROVIDING TO US.

13                                 (JURY EXCUSED FOR THE EVENING.)

14                  (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT OUTSIDE THE  
15   PRESENCE OF THE JURY:)

16                  THE COURT: SO A COUPLE OF THINGS. IN TERMS OF THE  
17 CROSS WE HAD, THE DORNAN LETTERS ARE -- HAVE BEEN TESTIFIED TO  
18 DURING DIRECT AS TO -- AS THE BASIS OR A SIGNIFICANT PORTION  
19 OF THE BASIS FOR THE STATEMENT THAT UNDERLIES IT.

20                                 AND SO I AM GOING TO ALLOW SOME PROBING INTO  
21 THE VALIDITY OR CLAIM OF INVOLVEMENT IN PROMPTING THOSE  
22 LETTERS. SO IN THAT CONTEXT, IN THAT CONTEXT ALONE, I WILL  
23 ALLOW SOME DISCUSSION OF 18.

24                                 BUT IN TERMS OF GOING INTO OTHER MATTERS, THEN  
25 I WILL DRAW THE LINE THERE TO JUST RANDOMLY GO INTO 18.

26                                 MR. VOSS: UNDERSTOOD, YOUR HONOR.

1 THE COURT: I NEED TO ASK MR. HART ABOUT INSTRUCTIONS  
2 AND VERDICT FORM BECAUSE IT SOUNDS LIKE WE'RE GETTING PRETTY  
3 DARN CLOSE TO THOSE.

4 MR. HART: I HAVE A COUPLE OF VERDICT FORMS.

5 THE COURT: I NEED TO MAKE SURE THAT MR. VOSS -- I'M  
6 NOT SAYING RIGHT NOW, THAT WHATEVER THE COURT GETS, MR. VOSS  
7 GETS. AND THEN SO, I'M NOT IN A POSITION TO ARGUE THEM RIGHT  
8 NOW, BUT WE NEED TO ALL START TO LOOK AT THIS TO FINALIZE IT.

9 MR. VOSS: YOUR HONOR, CAN WE REQUEST THAT WE GET  
10 THEM TODAY?

11 THE COURT: I THINK HE HAS SOME THAT WE'RE GOING TO  
12 ALL GET RIGHT NOW.

13 MR. VOSS: WE GAVE THEM OURS YESTERDAY.

14 THE COURT: I UNDERSTAND. THAT'S WHERE I'M GOING  
15 WITH THIS, MR. VOSS.

16 MR. HART: I ALSO HAVE A PARTIAL BRIEF ON THE  
17 PUBLIC-FIGURE ISSUE.

18 THE COURT: LET ME HEAR WHAT YOU HAVE, AND MAKE SURE  
19 WE ALL GET COPIES. AND THEN WE'LL GO ON, HOW WE'LL ADDRESS  
20 THOSE, STEP NUMBER 2.

21 MR. HART: THERE'S MY 1700.

22 THE COURT: ALL RIGHT. SO DISTRIBUTE, AND THEN I  
23 WILL PUT ON THE RECORD.

24 MR. HART: I'D LIKE TO PUT A LITTLE MORE WORK INTO  
25 THIS BRIEF. I HAVE A PARTIAL READY, IF THE COURT WOULD LIKE  
26 IT NOW.

1 THE COURT: WELL, WE HAVE A VERDICT FORM AND AN  
2 INSTRUCTION.

3 MR. HART: TWO VERDICT FORMS. ONE IS THE 1700, WHICH  
4 THE COURT HAS INDICATED HE'S LEANING TOWARDS, AND THE OTHER IS  
5 1704, WHICH PLAINTIFF THINKS IS THE APPROPRIATE VERDICT.

6 THE COURT: OKAY. AND YOU'VE GIVEN COPIES OF THOSE  
7 TO --

8 MR. HART: YES.

9 THE COURT: LET ME SEE THOSE FIRST. SO THESE, YOU  
10 SAY, ARE BASED ON -- GIVE ME THE CACI --

11 MR. HART: THEY'RE STRAIGHT OUT OF CACI AND THEY ARE  
12 IDENTIFIED --

13 THE COURT: DOWN AT THE BOTTOM. OKAY. I SEE THAT  
14 NOW. SO THIS IS VERDICT FORM 1700 AND 1704, IS WHAT HAS BEEN  
15 PROVIDED BY PLAINTIFF?

16 AND THAT'S WHAT YOU HAVE AS WELL, MR. VOSS,  
17 FROM PLAINTIFF?

18 MR. VOSS: YES, I HAVE TWO VERDICT FORMS HERE. I  
19 DON'T KNOW WHAT THEY SAY. I ASSUME THAT'S A CORRECT  
20 REPRESENTATION.

21 THE COURT: WE'RE LOOKING AT THE BOTTOM LEFT-HAND  
22 CORNER, IS WHERE THERE --

23 MR. VOSS: YES. AND, OF COURSE, YOUR HONOR, WE  
24 DISCUSSED THE APPROPRIATE CACI INSTRUCTIONS LAST WEEK -- OR I  
25 DON'T REMEMBER WHEN IT WAS AT THIS POINT -- AND LISTENED TO  
26 THE COURT'S THOUGHTS WITH RESPECT TO 1700, 1704, AND THAT'S



1 WHY WE SUBMITTED YOU A NEW 1700.

2 THE COURT: I UNDERSTAND. LET ME DO THIS BEFORE WE  
3 GO FURTHER ON THIS BRIEF. WHAT DO YOU BELIEVE YOU HAVE  
4 TIMING-WISE IN TERMS OF YOUR CROSS-EXAMINATION?

5 MR. HART: 30 MINUTES.

6 THE COURT: 30 MINUTES OR SO OF THAT.

7 MR. HART: MAYBE 40.

8 THE COURT: LET'S JUST SAY 45. IN AN ABUNDANCE OF  
9 CAUTION, WE'LL SAY 45 MINUTES OF CROSS.

10 SO ANOTHER 15, 20 MINUTES, PROBABLY, OR MORE.

11 I ASSUME IT'S LESS THAN 45, BUT THERE IS  
12 DEFINITELY 15 OR 20 MINUTES OF REDIRECT?

13 MR. VOSS: WHAT I COULD REPRESENT, BASED ON HOW  
14 THINGS HAVE GONE, YES. HOWEVER, WHAT I WOULD REPRESENT TO THE  
15 COURT IS THAT, AT THE PRESENT TIME, I DO NOT HAVE A SINGLE  
16 ADDITIONAL QUESTION OF MY WITNESS. IF SOMETHING COMES UP  
17 TOMORROW, BUT RIGHT NOW WE HAVE ZERO.

18 THE COURT: I'M TRYING TO GAGE. SO HE'S GOT  
19 45 MINUTES. IN AN ABUNDANCE OF CAUTION, LET'S JUST SAY 15 TO  
20 20. SO WE'VE GOT AN HOUR-ISH WITH DEFENDANT.

21 AND THEN THAT WOULD BE THE END OF THE EVIDENCE  
22 FOR ALL PARTIES; CORRECT?

23 MR. HART: I THINK SO.

24 MR. VOSS: CORRECT.

25 THE COURT: ALL RIGHT. SO WHAT THAT, THEN, MEANS IS  
26 THAT, HOPEFULLY, THEY'LL BE HAPPY AND NOT IN A LYNCHING MOOD

1 IF WE TELL THE JURORS THAT WE ARE EXCUSING THEM FOR THE DAY,  
2 BECAUSE WE'RE GOING TO NEED TO HAVE DISCUSSIONS TO GET THIS  
3 FINALIZED BEFORE WE CAN GET TO INSTRUCTIONS AND CLOSINGS. SO  
4 WE ARE NOT PRESENTLY IN A POSITION TO BE INSTRUCTING THE  
5 JURORS, BECAUSE WE NEED TO HAVE THAT FINALIZATION.

6 MR. HART: THAT WAS OUR ASSESSMENT AS WELL.

7 MR. VOSS: YES, WE AGREE.

8 THE COURT: AND GIVEN WHERE WE ARE AT ON OUR TIME  
9 ESTIMATE, I HAVE TWO POSSIBILITIES: BRING THEM BACK IN THE  
10 AFTERNOON, OR BRING THEM BACK ON TUESDAY.

11 I THINK WHAT I WOULD PROBABLY DO IS BRING THEM  
12 BACK ON TUESDAY. AND THEN I WOULD, FOR ALL OF YOU, PLAN ON  
13 BEING HERE ALL DAY TOMORROW SO THAT WE -- I'M GOING TO, A,  
14 NEED SOME TIME TO LOOK AT THESE ONCE WE GOT TO THE CLOSE OF  
15 THE EVIDENCE, AND THEN WE'LL NEED TIME TO DISCUSS AND FINALIZE  
16 THEM AS WELL. AND IT WILL BE NICE IF WE COULD GET THAT DONE  
17 TOMORROW, BY THE END OF THE DAY TOMORROW. OR MAYBE IF THERE'S  
18 SOME HOMEWORK IN TERMS OF FINALIZING OR CLEANING UP THINGS,  
19 THAT'S ANOTHER STORY. SO THAT WE COULD THEN HIT THE GROUND ON  
20 TUESDAY MORNING WITH INSTRUCTIONS AND CLOSINGS AND THEN  
21 DELIBERATIONS.

22 THERE MAY BE, DEPENDING ON WHERE WE END UP  
23 TOMORROW, A NEED ON MONDAY TO COME AND DO ANY -- IF THERE'S  
24 ADDITIONAL WORK ON THESE, THAT WOULD BE -- I'M NOT  
25 SAYING -- THAT'S THE FALLBACK. THAT'S IN CASE THERE  
26 IS -- BECAUSE WE ARE GOING TO, FIRST THING ON TUESDAY THEN,

1 INSTRUCT AND CLOSE.

2 SO TO THE EXTENT WE CANNOT GET THINGS COMPLETED  
3 BY THE END OF THE DAY TOMORROW, THEN WE WOULD NEED MONDAY  
4 MORNING. THAT WOULD LIKELY BE THE TIME THAT WE HAVE TO DO  
5 THAT.

6 SO, AGAIN, I'M HOPEFUL THAT IT'S NOT NECESSARY  
7 AT ALL, BUT THAT IS OUR FALL-BACK CHUNK OF TIME IN ORDER TO DO  
8 ANY ADDITIONAL WORK, IF THERE IS, THAT WE DON'T HAVE COMPLETED  
9 TOMORROW. BECAUSE FRIDAY -- I HAVE A NUMBER OF HEARINGS ALL  
10 DAY ON FRIDAY, SO THERE'S NOT TIME ON FRIDAY TO DO IT. BUT IT  
11 WOULD BE -- AND I HAVE LAW AND MOTION ON MONDAY AFTERNOON, BUT  
12 MONDAY MORNING WOULD BE -- AGAIN, I'M OPTIMISTIC WE WON'T NEED  
13 IT, BUT I JUST WANT TO GIVE EVERYBODY THE HEADS-UP NOW, THAT  
14 THAT WOULD BE WHERE WE WOULD GET ANY ADDITIONAL TIME.

15 MR. VOSS: ALL THINGS BEING EQUAL, FIRST OF ALL, I  
16 WOULD SINCERELY HOPE THAT WE WOULD BE READY TO GO TOMORROW.

17 THAT BEING SAID, THERE IS A -- YES, I DO HAVE A  
18 MORNING HEARING. I MIGHT BE ABLE TO PUNT IT TO AN ASSOCIATE,  
19 BUT I PREFER TO BE INVOLVED. SO IF WE HAD TO COME BACK,  
20 PERHAPS WE COULD SAY -- WELL, YOU GOT YOUR NORMAL MOTION  
21 CALENDAR ON MONDAY ANYWAY.

22 THE COURT: AT 2:00. I WAS GOING TO SAY MONDAY  
23 MORNING. SO IT WOULD NOT BE MONDAY AFTERNOON.

24 MR. VOSS: SO, YOU KNOW, IDEALLY SOMETHING LIKE 10:30  
25 WOULD BE -- I COULD REQUEST PRIORITY.

26 THE COURT: AND WE'LL SEE. LIKE I SAID, I'M

1 OPTIMISTIC WE WON'T NEED IT, BUT I'M PUTTING THAT OUT THERE,  
2 PLANTING THE SEED, IN CASE THERE IS THAT NEED.

3 SO WITH THAT, THEN, MR. HART, I THINK WE WOULD  
4 NEED WHAT YOU HAVE BRIEFING-WISE SO THAT THEY HAVE AT LEAST A  
5 LITTLE BIT OF TIME TO LOOK AT IT.

6 AND, UNFORTUNATELY, I HAVE MEETING MOST OF THIS  
7 EVENING, BUT BETWEEN THE MORNING AND A A DIFFERENT TIME, IT  
8 GIVES ME A CHANCE TO START GETTING THROUGH THAT AS WELL. SO I  
9 THINK THAT IS THE BEST, MOST PRODUCTIVE, FAIREST MEANS OF  
10 PROGRESSING AT THIS TIME.

11 MR. HART: OKAY. THAT'S WHAT WE'LL DO, JUDGE.

12 MR. VOSS: SO WE CAN EXPECT -- THIS IS THE BRIEF?

13 THE COURT: THAT'S HIS BRIEF. AND THEN WE'LL  
14 ENTERTAIN ARGUMENT FROM ANYBODY. YOU KNOW, WE'LL HAVE THE  
15 DISCUSSIONS AND EVERYTHING. AND I WILL ABSOLUTELY CONSIDER --

16 AND, MR. HART, LET ME ASK YOU TWO QUESTIONS.  
17 FIRST OF ALL, TO THE DEFENDANTS.

18 THE MATTERS THAT YOU SUBMITTED YESTERDAY, THE  
19 JURY INSTRUCTIONS AND THE VARIOUS VERDICT FORMS, ONE WAS ON  
20 PLEADING, SAME THING, NOT ON PLEADING, HAS THAT BEEN FILED AT  
21 ALL OR JUST TURNED IN?

22 SO WE'LL NEED TO GET THAT FILED AS WELL SO THAT  
23 IT'S PART OF THE RECORD. BECAUSE HANDING IT TO ME DOESN'T GET  
24 IT INTO THE REGISTER OF ACTION. IT DOESN'T BECOME PART OF THE  
25 RECORD IF THAT'S -- YOU KNOW, BECOMES AN ISSUE FOR APPELLATE  
26 REASONS OR WHATEVER. SO I WANT TO MAKE SURE WE HAVE A

1 COMPLETE RECORD OF WHAT EVERYBODY HAS SUBMITTED.

2 SO LIKEWISE, TURNING TO MR. HART, EVERYTHING  
3 THAT YOU HAVE JUST HANDED TO ALL OF US HERE TODAY NEEDS TO BE  
4 ELECTRONICALLY FILED AS WELL SO, AGAIN, IT'S PART OF THE  
5 OFFICIAL RECORD.

6 MR. HART: UNDERSTOOD, JUDGE. AND I BELIEVE THE  
7 BRIEF HAS BEEN FILED, BUT I'LL CHECK ON MY -- IF I CAN GET ON  
8 THE PHONE IN TIME.

9 THE COURT: AND IF NOT, IT CAN BE DONE TONIGHT OR IN  
10 THE MORNING, BUT I WANT TO MAKE SURE THAT IT'S IN THE REGISTER  
11 OF ACTION SO THAT ANYTHING THAT HAS BEEN HANDED IN HERE IS  
12 PART OF THE OFFICIAL, BECAUSE, AGAIN, WE DON'T -- IN THE  
13 COURTROOM, WE DON'T REALLY TAKE THE STUFF IN THAT WAY.

14 SO IF YOU COULD PUT A CAPTION PAGE ON THE  
15 INSTRUCTIONS, YOU KNOW, "PROPOSED" OR "UPDATED" OR "AMENDED  
16 INSTRUCTIONS," SOMETHING SIMPLE ALONG THOSE LINES, JUST SO  
17 THAT IT'S -- IT WILL NEED A CAPTION PAGE.

18 MR. VOSS: I'M LOOKING TO MY HIGHER SOURCE.

19 UNIDENTIFIED SPEAKER IN AUDIENCE: ORIGINALLY, YOU  
20 HAD ASKED THAT WE DO NOT FILE THE ORIGINAL INSTRUCTION THAT WE  
21 SUBMITTED AT THE BEGINNING OF TRIAL. SO IF WE'RE  
22 SUBMITTING --

23 THE COURT: I THOUGHT WE DID FILE THOSE.

24 UNIDENTIFIED SPEAKER IN AUDIENCE: OKAY. SO JUST THE  
25 VERDICT FORM?

26 THE COURT: WELL, NO, I THOUGHT WE DID FILE -- THEY

1 SHOULD BE IN THE FILE SO THAT THEY'RE PART OF THE --

2 UNIDENTIFIED SPEAKER IN AUDIENCE: OKAY. WE HAVE NOT  
3 BECAUSE WE ARE --

4 MR. VOSS: WHAT DOES IT SAY, MR. CLERK?

5 THE COURT: AND THE REASON FOR FILING THE PROPOSALS  
6 IS SO THAT, AGAIN, WE HAVE WHAT'S PROPOSED. AND THEN WE WILL  
7 LATER FILE WHAT IS ACTUALLY READ AND GIVEN. SO WE'LL HAVE --  
8 ALL THE VARIOUS PROPOSALS NEED TO BE IN THE RECORD.

9 AND THEN, LIKE I SAID, WE WILL ALSO LATER FILE  
10 HERE'S WHAT WAS READ TO THE JURY, THE ACTUAL FINAL VERSION.  
11 SO THAT TO THE EXTENT THERE BECOMES ANY ISSUE ABOUT THE  
12 LANGUAGE, WE HAVE THE PROPOSALS, WE HAVE WHAT WAS GIVEN, AND  
13 THEN THERE'S A COMPLETE RECORD.

14 MAKE SURE THAT WE DO HAVE ALL THAT FILED, SO,  
15 AGAIN, IT IS IN THE REGISTER OF ACTIONS. IN CASE WE HAVE ANY  
16 APPELLATE ISSUES, WHEN YOU GO TO DESIGNATE, IT NEEDS TO BE IN  
17 THE REGISTER OF ACTIONS.

18 MR. VOSS: WE'RE HAPPY TO COMPLY WITH WHATEVER YOU  
19 WANT.

20 THE COURT: ALL RIGHT. THEN WE CAN GO AHEAD AND GO  
21 OFF THE RECORD. THAT WILL TAKE CARE OF EVERYTHING.

22 (EVENING ADJOURNMENT.)

23

24

25

26

REPORTER'S CERTIFICATE

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STATE OF CALIFORNIA )  
 ) SS.  
COUNTY OF ORANGE )

I, MICHELLE LOTT-MEYERHOFER, CSR NO. 8226, REPORTER  
PRO TEMPORE, IN AND FOR THE SUPERIOR COURT OF THE STATE OF  
CALIFORNIA, COUNTY OF ORANGE, DO HEREBY CERTIFY;

THAT THE FOREGOING TRANSCRIPT IS A FULL, TRUE AND  
CORRECT TRANSCRIPT OF MY SHORTHAND NOTES, AND IS A FULL, TRUE  
AND CORRECT STATEMENT OF THE PROCEEDINGS HAD IN SAID CAUSE.

DATED THIS 13th DAY OF November, 2024.

*Michelle Lott-Meyerhofer*

-----  
MICHELLE LOTT-MEYERHOFER, CSR NO. 8226  
OFFICIAL REPORTER PRO TEM



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<b>A</b>			
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