

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, ) TRIAL TESTIMONY OF  
 INCLUSIVE, ) NGUYEN DINH THANG  
 )  
 DEFENDANTS. )  
 \_\_\_\_\_ )

HONORABLE DAVID J. HESSELTINE, JUDGE PRESIDING  
REPORTER'S TRANSCRIPT  
THURSDAY, NOVEMBER 14, 2024

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

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1 SANTA ANA, CALIFORNIA - THURSDAY, NOVEMBER 14, 2024  
2 TRIAL TESTIMONY OF NGUYEN DINH THANG  
3 \*\*\*\*\*  
4 (THE FOLLOWING PROCEEDINGS WERE HELD OUTSIDE THE PRESENCE OF  
5 THE JURY:)  
6 THE COURT: GOOD MORNING, EVERYONE. GO AHEAD AND GO  
7 ON THE RECORD IN KHOA V. THANG. IF WE COULD PLEASE HAVE THE  
8 APPEARANCES TODAY.  
9 MR. HART: GOOD MORNING, YOUR HONOR. HOYT HART FOR  
10 THE PLAINTIFF, LE XUAN KHOA.  
11 MR. VOSS: GOOD MORNING, YOUR HONOR, DAVID VOSS,  
12 VOSS, SILVERMAN & BRAYBROOKE, ON BEHALF OF THE DEFENDANTS.  
13 MR. ERIGERO: GOOD MORNING, YOUR HONOR. STEPHEN  
14 ERIGERO, ROPERS MAJESKI, ALSO ON BEHALF OF THE DEFENDANTS.  
15 THE COURT: THANK YOU VERY MUCH.  
16 ALL RIGHT. SO WE HAVE ALL COUNSEL AND THE  
17 PARTIES PRESENT. SO WE'RE CHECKING IN THE JURORS.  
18 SO WE WERE TALKING END OF THE DAY YESTERDAY,  
19 WE'RE IN THE HOUR-ISH BETWEEN WHAT'S LEFT WITH DEFENDANT'S  
20 TESTIMONY, BETWEEN THE CROSS AND THEN ANY REDIRECT. AND THEN  
21 WE'LL SEE WHERE WE'RE AT. AFTER THAT, WE'LL PROBABLY TAKE A  
22 BREAK SO THAT I CAN READ THE -- FINISH LOOKING AT THE BRIEF  
23 THAT PLAINTIFF SUBMITTED YESTERDAY. AND THEN WE'LL LIKELY  
24 SPEND THE AFTERNOON TRYING TO FINALIZE ALL OF THE INSTRUCTIONS  
25 AND VERDICT FORM. I'M OPTIMISTIC WE CAN GET THAT DONE HERE  
26 TODAY.

1 MR. VOSS: YOUR HONOR, JUST FOR THE COURTS  
2 ATTENTION, WE HAVE FILED A RESPONSE TO THAT BRIEF.  
3 THE COURT: OKAY.  
4 MR. VOSS: BUT WE DONT HAVE PAPER COPIES BECAUSE OUR  
5 ESTEEMED COLLEAGUE IS BRINGING THEM.  
6 THE COURT: ALL RIGHT. IS THERE --  
7 MR. VOSS: JUST SO YOU KNOW IT'S IN --  
8 THE COURT: I'M CHECKING TO SEE NOW, IS IT IN THE  
9 REGISTER OF ACTION, OR IS IT IN THE PENDING QUEUE?  
10 MR. VOSS: I'M GUESSING IT'S PENDING.  
11 MR. HART: ARE 236 AND 237 ADMITTED?  
12 AND 238 IS ADMITTED?  
13 THE COURT: 236 IS ADMITTED. 237 IS NOT.  
14 THE CLERK: 237 WAS ADMITTED 11/12. 236 HAS NOT BEEN  
15 ADMITTED.  
16 MR. HART: BUT 238?  
17 THE COURT: 238 HAS BEEN ADMITTED.  
18 (THE FOLLOWING PROCEEDINGS WERE HELD IN OPEN COURT IN THE  
19 PRESENCE OF THE JURY:)  
20 THE COURT: ALL RIGHT. GOOD MORNING, LADIES AND  
21 GENTLEMEN. WELCOME BACK AND THANK YOU YET AGAIN.  
22 COUNSEL, FEEL FREE TO SIT DOWN. WE'RE GOING TO  
23 RESUME.  
24 DR. THANG, IF YOU WANT TO RETURN TO THE WITNESS  
25 STAND. I'LL REMIND YOU, AS YOU MAKE YOUR WAY BACK UP, THAT  
26 YOU ARE UNDER THE SAME OATH THAT YOU TOOK YESTERDAY. GIVE YOU

1 THAT OPPORTUNITY TO SETTLE IN THERE, AND THEN WE'LL START WITH  
 2 MR. HART'S QUESTIONING IN JUST A MOMENT.  
 3 CROSS-EXAMINATION RESUMED  
 4 BY MR. HART:  
 5 Q GOOD MORNING, DR. THANG.  
 6 A GOOD MORNING.  
 7 Q THANK YOU FOR BEING HERE TODAY.  
 8 IF YOU TAKE A LOOK AT EXHIBIT 237, PLEASE.  
 9 A YES.  
 10 Q REMIND THE JURY WHAT EXHIBIT 237 IS, PLEASE.  
 11 A 237 IS THE PLAINTIFF ARTICLE DATED MAY 22ND,  
 12 2020, PUBLISHED ON S.B.T.N.  
 13 Q OKAY. WHAT WAS THE DATE AGAIN?  
 14 A MAY 22, 2020.  
 15 Q 22ND?  
 16 A YES.  
 17 Q OKAY. YOU READ THIS ARTICLE AT OR ABOUT THE  
 18 TIME IT WAS PUBLISHED?  
 19 A YES.  
 20 Q AND FROM YOUR PERSPECTIVE, THIS ARTICLE  
 21 AUTHORED BY PROFESSOR KHOA TAKES ISSUE WITH SOME OF THE THINGS  
 22 THAT APPEARED IN THE DECEMBER 25, 2019 POSTING ON MACH SONG  
 23 MEDIA?  
 24 A I THINK SO.  
 25 Q OKAY. AND SOME OF THE THINGS HE WROTE IN THERE  
 26 YOU TOOK ISSUE WITH; CORRECT? YOU DISPUTED SOME OF THE THINGS

1 A YES.  
 2 Q "MR. KHOA FALSELY CLAIMED THAT HE HELD A  
 3 DOCTORAL DEGREE IN THE APPLICATION FOR A GRANT FROM THE  
 4 DEPARTMENT OF STATE. THAT IS A CRIMINAL OFFENSE."  
 5 THAT WAS INCLUDED IN YOUR MAY 25TH ARTICLE;  
 6 CORRECT?  
 7 A CORRECT.  
 8 Q CAN YOU TELL US HOW THIS STATEMENT RELATES IN  
 9 ANY WAY TO WHAT DID OR DIDN'T HAPPEN IN THE '90S ABOUT  
 10 R.O.V.R.? HOW DOES THIS HELP YOU SET THE RECORD STRAIGHT?  
 11 A VERY MUCH. BECAUSE AS I EXPLAINED BRIEFLY  
 12 YESTERDAY -- AND YOU ALSO ACKNOWLEDGED -- THAT THE DEPARTMENT  
 13 OF STATE AND YOUR CLIENT OPPOSED THE LEGISLATION AUTHORED BY  
 14 CONGRESSMAN CHRISTOPHER SMITH, WHICH WAS ALSO KNOWN AS THE  
 15 ANTI-CPA -- "CPA" STANDS FOR "COMPREHENSIVE PLAN OF ACTION" --  
 16 UNDER WHICH TENS OF THOUSANDS OF BOAT PEOPLE WOULD BE FORCIBLY  
 17 REPATRIATED TO VIETNAM.  
 18 SO THEY CONTINUED TO OPPOSE THAT LEGISLATION  
 19 FROM ITS INCEPTION IN MARCH 1995, ALL THE WAY TO THE WHITE  
 20 HOUSE. BECAUSE THAT'S WHERE IT WAS. IT'S PASSED THE HOUSE,  
 21 PASSED THE SENATE, PASSED THE CONFERENCE BETWEEN THE TWO  
 22 CHAMBERS, AND IT WAS ABOUT TO BE SIGNED INTO LAW BY CLINTON.  
 23 AND THE DEPARTMENT OF STATE CONTINUED TO OPPOSE  
 24 IT, WITH MR. KHOA, JUST THE FOLLOWING WEEK, AFTER APRIL 30,  
 25 1996, THE LETTER FROM DORNAN. THE DEPARTMENT OF STATE --  
 26 Q OKAY --

1 THAT HE WROTE?  
 2 A IN MY LATER ARTICLE.  
 3 Q NO. I'M JUST SAYING, AS YOU'RE READING, IN  
 4 YOUR MIND, YOU DISAGREE WITH SOME OF THE THINGS HE'S --  
 5 A OH, YES, IN -- IN HERE, I SAID, MY GOSH --  
 6 Q JUST A YES OR NO, PLEASE.  
 7 A YES.  
 8 Q OKAY. AND SO YOU TOLD US YESTERDAY THAT YOU  
 9 DECIDED TO SET THE RECORD STRAIGHT?  
 10 A CORRECT.  
 11 Q AND THAT'S WHY YOU WROTE YOUR MAY 25, 2020  
 12 ARTICLE?  
 13 A THAT'S CORRECT.  
 14 Q AND THAT'S THE NEXT IN ORDER, EXHIBIT 238; IS  
 15 THAT RIGHT?  
 16 A THAT'S RIGHT.  
 17 Q NOW, YOUR MAY 25, 2020 ARTICLE SETTING THE  
 18 RECORD STRAIGHT ABOUT R.O.V.R.?  
 19 A HOW IT CAME ABOUT, YES.  
 20 Q SOMETHING THAT WAS REALLY RELEVANT BACK IN THE  
 21 '90S?  
 22 A CORRECT.  
 23 Q OKAY. IN YOUR ARTICLE SETTING THE REPORT  
 24 STRAIGHT ABOUT R.O.V.R. IN THE '90S, YOU INCLUDED THIS  
 25 STATEMENT THAT'S WRITTEN ON THE BOARD, ON THE WHITEBOARD,  
 26 DIDN'T YOU?

1 MR. VOSS: OBJECTION, YOUR HONOR. LET HIM FINISH THE  
 2 QUESTION, PLEASE.  
 3 THE COURT: WAIT A MINUTE.  
 4 IF CAN I SEE THAT QUESTION ONE MORE TIME. I  
 5 WANT TO DOUBLE-CHECK.  
 6 ALL RIGHT. YOU CAN CONTINUE, BUT LET'S WRAP  
 7 THIS UP. THE SAME ADMONITION APPLIES ACROSS THE BOARD, TO  
 8 MAKE SURE AND ANSWER THE QUESTION THAT'S BEING POSED.  
 9 THE WITNESS: YES. I'LL ANSWER THE QUESTION.  
 10 SO THE DEPARTMENT OF STATE, JUST THE FOLLOWING  
 11 WEEK, DROPPED ITS OPPOSITION.  
 12 BY MR. HART:  
 13 Q I'M REALLY SORRY I INTERRUPTED THAT, BECAUSE  
 14 THAT'S A VERY INTERESTING ANSWER.  
 15 DIDN'T YOU WRITE IN THE ARTICLE ALL OF THOSE  
 16 DETAILS YOU JUST EXPLAINED?  
 17 A IF YOU GO DOWN TO THE FOLLOWING --  
 18 Q EASY QUESTION.  
 19 A YES, I DID. YEAH.  
 20 Q OKAY. SO YOU'VE ALREADY GOT ALL OF THAT  
 21 INFORMATION IN YOUR ARTICLE?  
 22 A YES.  
 23 Q HOW DOES THIS SENTENCE CONTRIBUTE TO THAT?  
 24 A IT EXPLAIN WHY THE DEPARTMENT OF STATE SUDDENLY  
 25 DROPPED ITS OPPOSITION TO THAT BILL AND STARTED TO COLLABORATE  
 26 WITH CONGRESSMAN SMITH TO CREATE THE PROGRAM THAT IS KNOWN TO

1 BE R.O.V.R.  
 2 Q ARE YOU TELLING US THAT BECAUSE THERE WAS THIS  
 3 CLAIM ABOUT A FALSIFIED APPLICATION, THAT SUDDENLY PEOPLE'S  
 4 POLITICAL ATTITUDES CHANGED?  
 5 A YES. BECAUSE MR. KHOA WAS USED BY DEPARTMENT  
 6 OF STATE, AS HIS TESTIMONY, TO OPPOSE THE BILL.  
 7 Q SO WHAT YOU'RE TELLING US IS, THE PEOPLE ON THE  
 8 OTHER SIDE OF THAT ARGUMENT USED THIS CLAIM AGAINST MR. KHOA  
 9 TO NEUTRALIZE THE DEPARTMENT OF STATE?  
 10 A THEY -- THE DEPARTMENT OF STATE REALIZE THAT  
 11 THEIR WITNESS WAS NO LONGER CREDIBLE, BECAUSE SOMEONE WHO  
 12 MISREPRESENTED HIS ACADEMIC CREDENTIALS CANNOT BE TRUSTED ON  
 13 ANY MATTER OF POLICY.  
 14 Q OKAY. THANK YOU FOR CLEARING THAT UP.  
 15 AS YOU SIT HERE TODAY, YOU CANNOT PROVE THE  
 16 TRUTH OF THIS STATEMENT, CAN YOU?  
 17 MR. VOSS: OBJECTION. RELEVANCE.  
 18 THE COURT: OVERRULED.  
 19 THE WITNESS: I CAN CERTIFY THAT THIS WAS  
 20 WHAT -- PARAPHRASING WHAT THE CONGRESSMAN DORNAN WROTE.  
 21 MR. HART: BUT THAT'S NOT WHAT I'M ASKING.  
 22 MOVE TO STRIKE AS NONRESPONSIVE.  
 23 THE COURT: WAIT. WAIT.  
 24 IF YOU'RE GOING TO MAKE A MOTION, YOU HAVE TO  
 25 GIVE ME AND OPPORTUNITY TO RULE UPON IT.  
 26 DENIED.

1 MR. VOSS: OBJECTION.  
 2 BY MR. HART:  
 3 Q THERE WAS NO INVESTIGATION --  
 4 THE COURT: WAIT. WAIT. WAIT.  
 5 MR. HART: SORRY, JUDGE.  
 6 THE COURT: SPEAK UP A LITTLE LOUDER.  
 7 MR. VOSS: OBJECTION. CALLS FOR SPECULATION.  
 8 THE COURT: SUSTAINED.  
 9 BY MR. HART:  
 10 Q DO YOU HAVE ANY STATE DEPARTMENT DOCUMENT  
 11 FINDING THAT THIS STATEMENT IS TRUE?  
 12 A I WAS NOT INTERESTED IN THIS ISSUE, SO I DIDN'T  
 13 LOOK FOR IT. AND AS I EXPLAINED, RIGHT THE FOLLOWING WEEK,  
 14 THE STATE DEPARTMENT STARTED TO COLLABORATE. SO I SPENT ALL  
 15 MY TIME WORKING WITH CONGRESSMAN SMITH OFFICE TO CREATE THAT  
 16 NEW PROGRAM TO HELP SAVE TENS OF THOUSAND OF BOAT PEOPLE.  
 17 Q ARE YOU TELLING US THAT YOU -- AT THE TIME YOU  
 18 PUBLISHED THIS STATEMENT, OR EVEN BACK IN THE '90S, AT NO TIME  
 19 WERE YOU EVER REALLY CONCERNED WITH WHETHER WHAT THIS  
 20 STATEMENT SAYS WAS TRUE OR NOT? YOU DIDN'T CARE IF IT WAS  
 21 TRUE?  
 22 A NO, I--  
 23 MR. VOSS: OBJECTION.  
 24 THE COURT: CONTINUE.  
 25 THE WITNESS: I KNOW FOR SURE, AS A FACT, THAT THIS  
 26 IS WHAT MR. DORNAN WROTE IN HIS LETTER TO THE INSPECTOR

1 BY MR. HART:  
 2 Q DO YOU BELIEVE IN THE CONVENTION THAT WE HOLD  
 3 DEAR HERE IN AMERICA THAT YOU ARE INNOCENT UNTIL PROVEN  
 4 GUILTY?  
 5 MR. VOSS: OBJECTION, YOUR HONOR. ARGUMENTATIVE.  
 6 BEYOND THE SCOPE.  
 7 THE COURT: OVERRULED.  
 8 THE WITNESS: YES.  
 9 BY MR. HART:  
 10 Q WHEN WAS MR. KHOA EVER PROVEN GUILTY OF THIS  
 11 CHARGE THAT YOU PUBLISHED?  
 12 MR. VOSS: OBJECTION, YOUR HONOR. THAT IS NOT  
 13 RELEVANT. 352.  
 14 MAY WE APPROACH?  
 15 THE COURT: NO. OVERRULED.  
 16 THE WITNESS: IT DIDN'T SAY ANYTHING THAT MR. KHOA  
 17 WAS GUILTY. IT ONLY PRESENTED TWO FACTS. ONE IS THAT HE  
 18 MISREPRESENTED HIS ACADEMIC CREDENTIALS, WHICH HAS BEEN  
 19 ESTABLISHED THROUGH THE INVESTIGATION BY MR. DORNAN.  
 20 THE OTHER FACT IS THAT MISREPRESENTATION OF  
 21 CREDENTIALS OR PRESENTING FALSE STATEMENTS OF CLAIMS IN ORDER  
 22 TO OBTAIN FUNDING FROM THE FEDERAL GOVERNMENT IS A CRIME.  
 23 BY MR. HART:  
 24 Q ISN'T IT TRUE THAT WHAT DORNAN DID WAS GATHER  
 25 MATERIALS TO DISPARAGE A POLITICAL OPPONENT?  
 26 A NO.

1 GENERAL OF DEPARTMENT OF STATE. I KNOW FOR SURE THAT  
 2 MISREPRESENTING ONESELF OR PRESENTING FALSE STATEMENT OF  
 3 CLAIMS IN ORDER TO GET FUNDING FROM THE FEDERAL GOVERNMENT IS  
 4 A CRIME.  
 5 BY MR. HART:  
 6 Q DID YOU PERSONALLY WITNESS WHAT YOU HAVE  
 7 CHARGED IN THIS STATEMENT?  
 8 A WITNESS?  
 9 Q DID YOU SEE MR. KHOA FALSELY CLAIM A DOCTORAL  
 10 DEGREE IN AN APPLICATION AT THE DEPARTMENT OF STATE FOR A  
 11 GRANT?  
 12 MR. VOSS: OBJECTION. RELEVANCE.  
 13 BY MR. HART:  
 14 Q DID YOU PERSONALLY WITNESS THAT?  
 15 A I--  
 16 THE COURT: WAIT. THERE'S AN OBJECTION.  
 17 MR. VOSS: RELEVANCE AND BEYOND THE SCOPE OF DIRECT.  
 18 THE COURT: OVERRULED.  
 19 YOU MAY RESPOND.  
 20 THE WITNESS: I HAVE SEEN QUITE MANY GRANT  
 21 APPLICATIONS, COPIES OF THEM, AT THE OFFICE OF CONGRESSMAN  
 22 DORNAN.  
 23 BY MR. HART:  
 24 Q OKAY. MY QUESTION WAS --  
 25 A I DON'T REMEMBER WHICH FEDERAL AGENCIES THEY  
 26 WERE SUBMITTED TO, BUT THEY ARE FEDERAL AGENCIES.

1 Q SO YOU SAW GRANT APPLICATIONS?  
 2 A YES.  
 3 Q THE DETAILS OF WHICH YOU DON'T NECESSARILY  
 4 RECALL TODAY?  
 5 A I RECALL THE C.V'S --  
 6 Q OKAY.  
 7 A -- SUBMITTED ALONG WITH THOSE GRANT  
 8 APPLICATIONS, WHERE MR. KHOA WAS INDICATED TO BE A DOCTOR.  
 9 Q THE GRANT APPLICATION. CAN YOU SHOW ME A GRANT  
 10 APPLICATION WHERE HE HAS CLAIMED THAT HE'S A DOCTOR?  
 11 A I SAW THAT MY COUNSEL ALREADY BROUGHT UP SOME,  
 12 AND I HAVE A FEW MORE BUT NOT IN THE BINDERS OF EXHIBITS.  
 13 Q OKAY. YOU'RE TALKING ABOUT THE LETTER THAT  
 14 SOMEBODY WROTE ADDRESSED TO DOCTOR?  
 15 A NO. IT'S IN THE BODY OF APPLICATIONS SAYING  
 16 "DR. LE XUAN KHOA," MULTIPLE TIMES, IN THE GRANT APPLICATIONS.  
 17 Q OKAY. AND HAVE WE SEEN THOSE PRODUCED?  
 18 A I THINK THAT MY COUNSEL ALREADY BROUGHT THAT  
 19 UP.  
 20 Q OKAY. BUT DO WE ACTUALLY -- LET ME GET BACK TO  
 21 MY QUESTION.  
 22 DID YOU WITNESS THIS EVENT THAT YOU HAVE STATED  
 23 IN YOUR ARTICLE?  
 24 A I WITNESSED THE WRITING BY THE LETTER BY  
 25 CONGRESSMAN DORNAN. I GOT A COPY.  
 26 Q YOU'RE TALKING ABOUT THE APRIL 30 LETTER?

1 MS. LIMON.  
 2 Q SO THAT'S NOT PROFESSOR KHOA?  
 3 A OH, NO. HE MENTIONED IN THERE THAT: I SENT TO  
 4 YOU, MS. LIMON, A LETTER DATED MARCH 6, 1996. AT THE SAME  
 5 TIME, I SENT A SIMILAR LETTER TO MR. KHOA.  
 6 MR. HART: LET'S PUT UP EXHIBIT 233, WHICH IS THE  
 7 APRIL 2, 1996, LETTER.  
 8 MR. NGUYEN: MAY WE PUBLISH, YOUR HONOR?  
 9 THE COURT: YOU MAY. THANK YOU.  
 10 (DOCUMENT PUBLISHED.)  
 11 THE WITNESS: THE SECOND LAST -- NEXT-TO-LAST  
 12 SENTENCE -- PARAGRAPH. SECOND PAGE.  
 13 BY MR. HART:  
 14 Q ALL RIGHT. WE HEARD THE TESTIMONY YESTERDAY,  
 15 DID WE NOT --  
 16 A GO DOWN FURTHER.  
 17 MR. VOSS: HE'S STILL TRYING TO GET TO THAT.  
 18 THE COURT: THERE'S NOT A QUESTION PENDING, MR. VOSS.  
 19 AND THIS IS NOT YOUR WITNESS RIGHT NOW, SO PLEASE. OKAY.  
 20 MR. VOSS. MR. VOSS.  
 21 THE WITNESS: YES.  
 22 BY MR. HART:  
 23 Q DR. THANG --  
 24 A YES.  
 25 Q -- WE HEARD THE TESTIMONY YESTERDAY FROM  
 26 PROFESSOR KHOA THAT HE RECEIVED A LETTER FROM MR. DORNAN.

1 A AND APRIL 2ND COPY.  
 2 Q OKAY. AND THAT'S YOUR BASIS FOR WRITING THIS?  
 3 A OH --  
 4 MR. VOSS: OBJECTION. MISCHARACTERIZES THE WITNESS'  
 5 PRIOR TESTIMONY.  
 6 THE COURT: OVERRULED. IT'S A QUESTION.  
 7 HE MAY RESPOND.  
 8 THE WITNESS: YES. AT THE TIME, SOMETIME IN LATE  
 9 MARCH, CONGRESSMAN DORNAN ISSUED A PRESS RELEASE. AND THAT  
 10 WAS ABOUT A FEW WEEKS AFTER HE WROTE DIRECTLY TO YOUR CLIENT  
 11 ON MARCH 6, 1996, ASKING HIM TO PRODUCE DOCUMENTS SHOWING THAT  
 12 HE WAS A DOCTOR.  
 13 AND AFTER TWO WEEKS, DORNAN CAME UP WITH PRESS  
 14 RELEASE. IT BECAME A PUBLIC SCANDAL IN OUR COMMUNITY AT THE  
 15 TIME, COVERED IN THE NEWS.  
 16 BY MR. HART:  
 17 Q DO WE HAVE THE MARCH 6TH LETTER?  
 18 A I DON'T HAVE THE MARCH 6TH LETTER, BUT IF YOU  
 19 LOOK AT THE APRIL 2ND LETTER, IT'S MENTIONED IN THERE. AND I  
 20 HAVE A PRESS RELEASE ABOUT THE MARCH 6TH LETTER FROM DORNAN.  
 21 Q AND IS THAT IN EVIDENCE?  
 22 A I'M NOT SURE. I GAVE IT TO MY COUNSEL.  
 23 Q ALL RIGHT. SO WE DON'T KNOW WHAT DORNAN'S  
 24 MARCH 6TH LETTER SAID, DO WE?  
 25 A IF YOU GO BACK TO THE APRIL 2ND LETTER, HE SAID  
 26 THAT I -- THAT WAS THE LETTER TO THE DIRECTOR OF O.R.R.,

1 DID YOU HEAR THAT TESTIMONY?  
 2 A YES.  
 3 Q AND THAT HE RESPONDED AND GAVE MATERIALS TO  
 4 CONGRESSMAN DORNAN?  
 5 A YES.  
 6 Q AND SOMETIME AFTER THAT, WE HEARD YOUR  
 7 TESTIMONY THAT YOUR FRIEND, DR. AL SANTOLI, CALLED YOU INTO  
 8 THE OFFICE AND SHOWED YOU A LOT OF MATERIALS; CORRECT?  
 9 A CORRECT.  
 10 Q AND THAT'S AS FAR AS IT WENT; ISN'T THAT TRUE?  
 11 A THAT'S NOT COMPLETE. THAT'S NOT THE WHOLE  
 12 TRUTH. BECAUSE YOUR CLIENT ALSO CLAIM HE KNEW DR. AL SANTOLI  
 13 VERY WELL. AND DORNAN SERVED ON THE ADVISORY COMMITTEE OF  
 14 S.E.A.R.A.C. AT THE TIME.  
 15 Q OKAY. SO DO WE HAVE ANY REASON TO BELIEVE THAT  
 16 PROFESSOR KHOA DID NOT PRESENT THE MATERIALS REQUESTED BY  
 17 CONGRESSMAN DORNAN?  
 18 MR. VOSS: OBJECTION. CALLS FOR SPECULATION.  
 19 THE COURT: OVERRULED.  
 20 THE WITNESS: WELL, IF YOU GO TO THE -- WHAT IS THIS  
 21 NUMBER?  
 22 THE COURT: THIS IS 233. THIS IS THE DORNAN  
 23 APRIL 2ND, 1996, LETTER. AND THIS IS THE SECOND PAGE.  
 24 THE WITNESS: THANK YOU.  
 25 THE COURT: LOOK AT THE HARD COPY, IF YOU WOULD LIKE.  
 26 YOU CAN FLIP AROUND.

1 THE WITNESS: CAN YOU REPEAT THE QUESTION?  
 2 MR. HART: MAYBE I'LL WITHDRAW THAT QUESTION AND  
 3 REPHRASE AND START OVER.  
 4 BY MR. HART:  
 5 Q YOU HAVE THE EXHIBIT 233 IN FRONT OF YOU?  
 6 A YES.  
 7 Q LET'S SCROLL UP TO THE TOP, TO THE BEGINNING.  
 8 SO WE SEE HERE -- CAN YOU SEE MY LASER POINTER?  
 9 A I DO.  
 10 Q OKAY. SO WE SEE HERE THAT, APPARENTLY,  
 11 CONGRESSMAN DORNAN SENT A LETTER TO THE DIRECTOR OF O.R.R. ON  
 12 MARCH 6TH. AND IF WE TURN TO THE SECOND PAGE, WE SEE THAT HE  
 13 ALSO SENT ONE TO PROFESSOR KHOA, AND THAT HIS OFFICE IS  
 14 CONTINUING THEIR INVESTIGATION.  
 15 **AND YOU HAVE EXPLAINED THAT THE GENESIS OF THIS**  
 16 **INVESTIGATION WAS STATE DEPARTMENT -- HOW DO I WANT TO SAY**  
 17 **THIS -- STATE DEPARTMENT RETICENCE OR OBJECTION TO THE**  
 18 **ANTI-CPA AMENDMENT OF CONGRESSMAN SMITH?**  
 19 A NO, I DIDN'T SAY THAT.  
 20 Q OKAY. WHAT DID I GET WRONG ABOUT THAT?  
 21 A HE WROTE IN HERE THAT -- IN THE LETTER DATED  
 22 APRIL 30TH -- HE RECEIVED AN OVERWHELMING NUMBER OF TELEPHONE  
 23 CALLS AND LETTERS FROM RESPECTED VIETNAMESE-AMERICAN LEADERS.  
 24 "BEGINNING IN JANUARY 1996, I HAVE RECEIVED AN  
 25 OVERWHELMING NUMBER OF TELEPHONE CALLS AND LETTERS FROM  
 26 RESPECTED VIETNAMESE-AMERICAN LEADERS IN MY DISTRICT AND

1 SECOND PARAGRAPH: "ENCLOSED IS AN ARTICLE FROM THE MARCH 1996  
 2 COMMUNITY NEWS MAGAZINE PUBLISHED IN MY DISTRICT IN ORANGE  
 3 COUNTY, CALIFORNIA. THE ARTICLE ENTITLED 'S.E.A.R.A.C. AND  
 4 N.A.V.A.S.A. FOUND TO HAVE MISAPPROPRIATED VIETNAMESE  
 5 COMMUNITY OF ORANGE COUNTY NAME IN EFFORT TO SECURE GOVERNMENT  
 6 FUNDS."  
 7 "IN ADDITION, WE HAVE LEARNED THAT  
 8 I.R.A.C./S.E.A.R.A.C. HAS MISREPRESENTED LE XUAN KHOA AS A  
 9 DOCTOR. RECENTLY, IN THE FACE OF PUBLIC INQUIRY, MR. KHOA  
 10 ADMITTED THAT HE IS NOT A DOCTOR."  
 11 Q OKAY. SO THIS PARTICULAR STATEMENT, WHICH WE  
 12 SEE RIGHT HERE IN THE MIDDLE OF THE SECOND PARAGRAPH, IS THAT  
 13 DORNAN'S INVESTIGATION INDICATES THAT S.E.A.R.A.C. AND  
 14 I.R.A.C. HAVE MISREPRESENTED PROFESSOR KHOA TO BE A DOCTOR?  
 15 A THAT'S WHAT'S WRITTEN.  
 16 Q WOULD YOU AGREE WITH ME THAT THAT DOES NOT  
 17 PROVE THAT HE FALSELY CLAIMED A DOCTORAL DEGREE IN A STATE  
 18 DEPARTMENT GRANT APPLICATION?  
 19 A YOU MUST KNOW THAT WHEN AN ORGANIZATION APPLY  
 20 FOR FUNDING, IT APPLIES FOR FUNDING AS AN ORGANIZATION, NOT ON  
 21 BEHALF OF ONE INDIVIDUAL, ON BEHALF OF STAFF OR A MANAGER OR  
 22 THE EXECUTIVE DIRECTOR.  
 23 AND YOU SHOULD KNOW THAT THE HEAD OF  
 24 ORGANIZATION IS FULLY RESPONSIBLE FOR WHATEVER IS SENT IN THE  
 25 GRANT APPLICATION BY THE ORGANIZATION.  
 26 Q AGREE WITH ME THEN THAT THIS PARTICULAR

1 ACROSS THE UNITED STATES."  
 2 THAT WAS WHAT PROMPTED HIM TO START THE  
 3 INVESTIGATION.  
 4 THE COURT: CAN WE JUST PAUSE FOR A MINUTE. CAN YOU  
 5 IDENTIFY EXACTLY WHAT YOU'RE READING FROM, INCLUDING BY DATE  
 6 AND EXHIBIT NUMBER, SO WE HAVE A CLEAR RECORD.  
 7 THE WITNESS: SORRY. THAT'S EXHIBIT 234, THE  
 8 APRIL 30, 1996 LETTER FROM DORNAN.  
 9 THE COURT: THANK YOU VERY MUCH. THAT'S JUST FOR THE  
 10 RECORD.  
 11 GO AHEAD, MR. HART, WITH YOUR QUESTION.  
 12 BY MR. HART:  
 13 Q OKAY. SO IS IT YOUR CONTENTION THAT SOME PART  
 14 OF THIS APRIL 2ND LETTER, EXHIBIT 233, PROVES THE TRUTH OF  
 15 THIS STATEMENT THAT'S ON THE WHITEBOARD?  
 16 A I DIDN'T MAKE ANY CONTENTION. I JUST  
 17 PARAPHRASE EXACTLY WHAT MR. DORNAN WROTE.  
 18 Q ARE YOU PARAPHRASING FROM THIS PARTICULAR  
 19 LETTER?  
 20 A FROM, PRIMARILY, THE SECOND LETTER. BUT ALSO  
 21 LOOKING, AS BACKGROUND INFORMATION, AT THIS LETTER DATED  
 22 APRIL 7TH.  
 23 Q OKAY. SO WHAT IS IT ABOUT THIS APRIL 2ND  
 24 LETTER THAT, IN YOUR MIND, SUPPORTS YOUR NOTION THAT THIS  
 25 STATEMENT IS TRUE?  
 26 A IN ADDITION -- I'M SORRY. BACK TO EXHIBIT 233,

1 STATEMENT DOES NOT SAY THAT I.R.A.C. OR S.E.A.R.A.C. HAVE  
 2 MISREPRESENTED PROFESSOR KHOA TO BE A DOCTOR IN ANY GRANT  
 3 APPLICATION?  
 4 A READ THE NEXT SENTENCE: "WE HAVE ALSO FOUND  
 5 THAT MEMBERS OF THE PRESENT O.R.R. STAFF AFFILIATED WITH THE  
 6 COMMUNITY DEVELOPMENT GRANTS PROCESSED A PREVIOUS ASSOCIATION  
 7 WITH I.R.A.C./S.E.A.R.A.C. AS PAID STAFF CONSULTANTS."  
 8 "EVEN MORE DISTURBING" -- I'M SORRY. THE  
 9 SECOND PAGE, THE THIRD PARAGRAPH FROM THE BOTTOM UP: "EVEN  
 10 MORE DISTURBING, WE HAVE EVIDENCE OF THE ABOVE ORGANIZATIONS,  
 11 INCLUDING S.E.A.R.A.C., SERVING THE INTEREST OF FOREIGN  
 12 GOVERNMENTS" --  
 13 Q SECOND PAGE.  
 14 A OH, SECOND PAGE.  
 15 Q YEAH, I WANT THE JURY TO SEE THIS, TOO.  
 16 A -- "AND CONDUCTING LOBBYING ACTIVITIES RELATED  
 17 TO OVERSEAS INTERESTS AT CONFERENCES FUNDED BY O.R.R. AND  
 18 CONDUCTED BY BOTH S.E.A.R.A.C./N.A.V.A.S.A. NHMD."  
 19 AND THEN THE LAST SENTENCE IN THAT PARAGRAPH:  
 20 "IS O.R.R. MONEY BEING USED FOR THESE EVENTS? DOES O.R.R.'S  
 21 CHARTER PERMIT YOUR AGENCY'S FUNDS TO BE USED FOR  
 22 INTERNATIONAL ISSUES?"  
 23 Q DR. THANG, HOW DOES ANY OF THAT PROVE THAT THIS  
 24 IS TRUE; THAT PROFESSOR KHOA FALSELY CLAIMED A DOCTORAL DEGREE  
 25 IN A GRANT APPLICATION TO THE DEPARTMENT OF STATE?  
 26 A WELL, THAT QUESTION, YOU NEED TO ASK

1 MR. DORNAN. AND YOUR CLIENT SHOULD HAVE ASKED MR. DORNAN  
2 HIMSELF.  
3 Q I DON'T THINK DORNAN'S STILL ALIVE, IS HE?  
4 A HE IS STILL ALIVE.  
5 MR. VOSS: HE IS.  
6 THE WITNESS: OH, YOUR CLIENT SHOULD HAVE ASKED THAT  
7 BACK THEN IN 1996.  
8 BY MR. HART:  
9 Q WELL, I'M ASKING YOU TODAY: IF YOU'RE RELYING  
10 ON THIS LETTER TO SUPPORT THE STATEMENT THAT YOU PUBLISHED,  
11 I'M ASKING YOU TO EXPLAIN HOW WHAT YOU JUST TESTIFIED TO IN  
12 ANY WAY LOGICALLY SUPPORTS THAT STATEMENT; THAT PROFESSOR KHOA  
13 FALSELY CLAIMED HIS EDUCATIONAL CREDENTIALS?  
14 A I HAVE MADE IT PLENTY --  
15 THE COURT: WAIT. WAIT. WAIT.  
16 MR. VOSS: OBJECTION. ARGUMENTATIVE AS PHRASED.  
17 THE COURT: OVERRULED.  
18 YOU MAY RESPOND NOW, SIR.  
19 THE WITNESS: I HAVE MADE IT PLENTY CLEAR THAT I RELY  
20 MAINLY ON THE MARCH 30, 1996 LETTER. THIS WAS THE BACKGROUND.  
21 BY MR. HART:  
22 Q OKAY. SO, THEN, YOU WOULD AGREE --  
23 THE COURT: WAIT. WAIT. WAIT. I'M SORRY.  
24 MARCH 30, 1996 LETTER?  
25 THE WITNESS: I'M SORRY. APRIL 30TH, 1996 LETTER.  
26 THE COURT: THANK YOU.

1 LETTER AND THE PRESS RELEASE OF MR. DORNAN.  
2 MR. HART: OBJECTION. MOVE TO STRIKE AS HEARSAY.  
3 THE COURT: OVERRULED, IN THAT WE'RE LOOKING AT WHAT  
4 HE WAS RELYING UPON.  
5 BY MR. HART:  
6 Q SPECIFICALLY, WITHIN THE CONTEXT OF THIS  
7 LETTER, NOT SOME OTHER THINGS THAT ARE NOT IN EVIDENCE, WHERE  
8 DOES IT SAY IN THIS LETTER INFORMATION TO THE EFFECT THAT  
9 MR. KHOA FALSELY CLAIMED ANYTHING AS PART OF A GRANT  
10 APPLICATION?  
11 MR. VOSS: OBJECTION TO THE FORM OF THE QUESTION WITH  
12 RESPECT TO "EVIDENCE".  
13 THE COURT: SUSTAINED. YOU MAY REPHRASE.  
14 BY MR. HART:  
15 Q DR. THANG, THIS APRIL 2ND LETTER CITES A  
16 NEWSPAPER ARTICLE, REFERS TO PETITIONS, PROTESTING, NONE OF  
17 WHICH IS DESCRIBED IN DETAIL.  
18 WOULD YOU AGREE WITH THAT?  
19 MR. VOSS: OBJECTION. VAGUE.  
20 THE COURT: OVERRULED.  
21 YOU MAY RESPOND TO THE EXTENT YOU UNDERSTAND.  
22 THE WITNESS: WHICH ONE? EXCUSE ME. WHICH PARAGRAPH  
23 ARE YOU REFERRING TO?  
24 BY MR. HART:  
25 Q I'M REFERRING TO ANY OF THE PARAGRAPHS IN THIS  
26 EXHIBIT. YOU MAY CHOOSE ANY ONE YOU WISH, IF YOU CAN EXPLAIN

1 THEN, MR. HART, PLEASE CONTINUE.  
2 MR. HART: EXHIBIT 234.  
3 BY MR. HART:  
4 Q SO YOU WOULD AGREE WITH ME, THEN, THAT THIS  
5 PARTICULAR LETTER, EXHIBIT 233, DOES NOT IN AND OF ITSELF  
6 SUPPORT THE TRUTH OF THE STATEMENT THAT IS ON THE WHITEBOARD?  
7 A I LIKE THE WAY YOU PRESENTED IT, DOES NOT, IN  
8 AND BY ITSELF. BUT COLLECTIVELY THOSE TWO LETTERS AND OTHER  
9 DOCUMENTS SUPPORTED WHAT MR. DORNAN WROTE HERE ON APRIL 30,  
10 1996. IT SHOW THAT HE DID CONDUCT A THOROUGH INVESTIGATION  
11 THAT LASTED FOR FOUR MONTHS, AND THEN HE ARRIVE AT THOSE  
12 FINDINGS THAT HE HAD VERIFIED PLENTY OF TIMES, AT LEAST THREE  
13 TIMES.  
14 MR. HART: MOVE TO STRIKE AS NONRESPONSIVE.  
15 THE COURT: OVERRULED.  
16 BY MR. HART:  
17 Q WITHIN THIS EXHIBIT 233, CAN YOU PLEASE SHOW ME  
18 WHERE IT SAYS ANYTHING ABOUT MR. KHOA FALSELY CLAIMING  
19 ANYTHING?  
20 A AS THE HEAD OF S.E.A.R.A.C., HE WAS RESPONSIBLE  
21 FOR WHAT'S EVER PRESENTED IN THOSE PAGES OF THE GRANT  
22 APPLICATIONS THAT HE SIGNED AND SUBMITTED TO O.R.R. AND OTHER  
23 FEDERAL AGENCIES.  
24 Q BUT WE DON'T SEE ANYTHING IN THIS LETTER THAT  
25 SAYS HE'S FALSIFIED ANYTHING SUBMITTED TO O.R.R., DO WE?  
26 A IT'S IN PREVIOUS LETTERS AND IN THE MARCH 6TH

1 TO US HOW THIS LETTER SUPPORTS THE TRUTH OF THE CHALLENGED  
2 STATEMENT.  
3 A THIS LETTER SHOW THAT MR. DORNAN HAS GONE  
4 THROUGH A VERY SYSTEMATIC PROCESS TO INVESTIGATE, INCLUDING  
5 TALKING TO COMMUNITY MEMBERS, TALKING TO VIETNAMESE-AMERICAN  
6 LEADERS IN HIS OWN DISTRICT AND ACROSS THE COUNTRY, INCLUDING  
7 WRITING TO -- MULTIPLE TIMES TO MS. LIMON, WRITING TO  
8 MR. KHOA, YOUR CLIENT, IN ORDER TO COME TO A CONCLUSION, WHICH  
9 IS NUMBER 5 ON HIS LETTER OF APRIL 30, 1996.  
10 Q OKAY. WE'LL GET TO THAT IN A MINUTE. I'M  
11 ASKING YOU ABOUT THIS LETTER.  
12 A YES.  
13 Q BEFORE I MOVE ON TO THE NEXT ONE, WE HAVE TO  
14 FINISH WITH THIS ONE.  
15 CAN YOU SHOW ME ANY CONTENT IN THIS LETTER,  
16 EXHIBIT 233, WHICH SUPPORTS THE ACCUSATION THAT PROFESSOR KHOA  
17 FALSELY CLAIMED ANYTHING IN A GRANT APPLICATION?  
18 A FIRST, LET ME CLARIFY THAT -- THAT YOU'RE  
19 REFERRING TO THE ASSESSMENT OF CONGRESSMAN DORNAN; RIGHT.  
20 WHEN YOU MENTION "ACCUSATION," YOU'RE REFERRING TO MR. DORNAN,  
21 ITEM NUMBER 5.  
22 Q I'M NOT REFERRING TO MR. DORNAN. I'M REFERRING  
23 TO YOU. YOU PUBLISHED THAT STATEMENT. YOU SAID YOU GOT THE  
24 INFORMATION FROM EXHIBIT 233. I'M ASKING YOU TO SHOW US WHERE  
25 IN EXHIBIT 233 YOU GOT ANY INFORMATION THAT SUPPORTS THAT  
26 STATEMENT THAT YOU PUBLISHED.

1 MR. VOSS: OBJECTION. ARGUMENTATIVE, YOUR HONOR.  
 2 THE COURT: OVERRULED.  
 3 THE WITNESS: WHAT I SAID WAS, THE LETTER DATED  
 4 APRIL 30, 1996, WAS MY PRIMARY SOURCE. I PARAPHRASE NUMBER 5,  
 5 ITEM NUMBER 5, AT THE BOTTOM OF THE FIRST PAGE OF THAT LETTER.  
 6 AND, ADDITIONALLY, I LOOKED AT OTHER DOCUMENTS,  
 7 INCLUDING APRIL 2ND, 1996, WHICH SUPPORTED THE CONTENT OF  
 8 MR. DORNAN'S LETTER DATED APRIL 30, 1996.  
 9 BY MR. HART:  
 10 Q I PROMISE, DR. THANG, THAT WE WILL MOVE ON TO  
 11 THAT EXHIBIT AS SOON AS WE'RE FINISHED WITH THIS ONE.  
 12 EXHIBIT 233 DOES NOT CONTAIN ANY CONTENT THAT  
 13 SUPPORTS THE CHALLENGED STATEMENT, DOES IT?  
 14 A I CANNOT READ THE MIND OF MR. DORNAN, BUT IN  
 15 HERE, HE LAY OUT A NUMBER OF FACTS. ONE IS THAT O.R.R. DID  
 16 FUND S.E.A.R.A.C. AND N.A.V.A.S.A. AND OTHER AFFILIATED  
 17 ORGANIZATIONS OF S.E.A.R.A.C.  
 18 SECOND, HE MENTIONED THAT S.E.A.R.A.C. AND  
 19 I.R.A.C. HAS MISREPRESENTED LE XUAN KHOA AS A DOCTOR.  
 20 IT MUST BE THE CONTEXT OF THE FUNDING, BECAUSE  
 21 ALL THIS TALK ABOUT FUNDING, THE FUND FROM O.R.R. HAS BEEN  
 22 MISUSED IN THE MIND OF THE AUTHOR OF THIS LETTER. SO THERE HE  
 23 IS TALKING ABOUT FUNDING.  
 24 Q SO WHAT YOU'RE SAYING IS, IT'S NOT NECESSARILY  
 25 IN THIS LETTER, BUT IT'S IN DORNAN'S MIND, IF YOU UNDERSTAND  
 26 THE BACKGROUND ABOUT THE DIFFERENT RELATIONSHIPS?

1 RESOURCE CENTER.  
 2 YOU SEE THAT?  
 3 A I DO.  
 4 Q DO YOU AGREE THAT WHAT HE'S SAYING THERE IS:  
 5 I'M GETTING CONTACT FROM MY DISTRICT OPPOSING GOVERNMENT  
 6 FUNDING OF S.E.A.R.A.C.?  
 7 A IN MY DISTRICT AND ACROSS THE UNITED STATES.  
 8 Q YEAH.  
 9 A YEAH.  
 10 Q YOU, YOURSELF, WROTE A LETTER REQUESTING THAT  
 11 S.E.A.R.A.C. NOT RECEIVE GRANT FUNDING, DIDN'T YOU?  
 12 A THIS REFER TO JANUARY 1996 --  
 13 MR. VOSS: YOUR HONOR, OBJECTION.  
 14 THE COURT: WAIT.  
 15 MR. VOSS: BEYOND THE SCOPE OF DEFENDANTS'  
 16 CASE-IN-CHIEF DIRECT AND REPEATING WHAT WAS ALREADY ASKED IN  
 17 PLAINTIFF'S CALLING OF THIS WITNESS TO THE STAND. IT'S BEYOND  
 18 THE SCOPE.  
 19 THE COURT: OVERRULED.  
 20 YOU MAY CONTINUE.  
 21 THE WITNESS: YES, IT VERY CLEARLY STATED THAT HE  
 22 RECEIVED OVERWHELMING NUMBER OF CALL --  
 23 MR. HART: HOLD ON, PROFESSOR THANG. THERE'S NO --  
 24 THE WITNESS: I'M DOCTOR, NOT PROFESSOR. SORRY.  
 25 MR. HART: I'M SORRY?  
 26 THE WITNESS: I'M A DOCTOR, NOT A PROFESSOR.

1 A NO. IT'S IN THAT LETTER, RIGHT THERE I JUST  
 2 READ TO YOU. HE ASK MS. LIMON ABOUT DUE DILIGENCE -- DUE  
 3 DILIGENCE OF MONITORING OF FEDERAL FUNDS GRANTED TO  
 4 S.E.A.R.A.C. YOU READ THAT. I READ IT TO YOU AGAIN. AND IF  
 5 YOU NEED ME TO READ IT AGAIN, I WILL DO THAT. I WILL COMPLY.  
 6 Q I JUST WANT YOU TO EXPLAIN HOW ANYTHING IN THIS  
 7 LETTER PROVES THAT THAT'S TRUE.  
 8 MR. VOSS: OBJECTION. ASKED AND ANSWERED.  
 9 THE COURT: WE ARE AT THE ASKED-AND-ANSWERED POINT.  
 10 SUSTAINED.  
 11 MR. HART: ALL RIGHT. LET'S MOVE ON TO EXHIBIT 234.  
 12 MR. NGUYEN: MAY WE PUBLISH, YOUR HONOR?  
 13 THE COURT: YOU MAY.  
 14 MR. NGUYEN: THANK YOU.  
 15 (DOCUMENT PUBLISHED.)  
 16 BY MR. HART:  
 17 Q PROFESSOR THANG, YOU HAVE TOLD US A NUMBER OF  
 18 TIMES THAT THIS EXHIBIT IS YOUR PRIMARY SOURCE FOR WHY YOU  
 19 WROTE THE CHALLENGED STATEMENT IN YOUR MAY 25, 2020 ARTICLE;  
 20 CORRECT?  
 21 A CORRECT.  
 22 Q ALL RIGHT. SO IF WE LOOK AT THIS ARTICLE -- OR  
 23 THIS LETTER WRITTEN BY CONGRESSMAN DORNAN, WE SEE, IN THE  
 24 FIRST PARAGRAPH, THAT HE SAYS HE'S RECEIVED TELEPHONE CALLS  
 25 AND LETTERS FROM HIS DISTRICT EXPRESSING OPPOSITION TO FEDERAL  
 26 FUNDING OF PRIVATE 501(C)(3) ORGANIZATION SOUTHEAST ASIA

1 MR. HART: I APOLOGIZE. AT LEAST WE'RE NOT ASKING  
 2 WHAT YOUR PRONOUNS ARE.  
 3 THE COURT: CONTINUE ON.  
 4 BY MR. HART:  
 5 Q OKAY. SO, DR. THANG, THE OPENING PARAGRAPH OF  
 6 THIS APRIL 30 LETTER SAYS -- OR CONGRESSMAN DORNAN EXPLAINING  
 7 THAT HE'S HAD CONTACT FROM PEOPLE IN HIS DISTRICT AND ACROSS  
 8 THE U.S. OPPOSING FURTHER FUNDING OF S.E.A.R.A.C.?  
 9 A CORRECT.  
 10 Q AND YOU ARE ONE OF THOSE PEOPLE WHO HAVE  
 11 OPPOSED FURTHER FUNDING OF S.E.A.R.A.C.; CORRECT?  
 12 A THAT WAS MUCH LATER, AFTER HE ALREADY STARTED  
 13 INVESTIGATION.  
 14 Q OKAY. BUT YOU ARE, IN FACT, ONE OF THE PEOPLE  
 15 WHO -- OR ORGANIZATIONS WHO OPPOSED FURTHER FUNDING OF  
 16 S.E.A.R.A.C.; CORRECT?  
 17 A (NO AUDIBLE RESPONSE.)  
 18 Q IF YOU NEED TO REFRESH YOUR RECOLLECTION, LOOK  
 19 AT EXHIBIT 18.  
 20 A AND, AGAIN, IN -- YEAH, IN MARCH -- I'M SORRY.  
 21 BACK TO THE LETTER OF APRIL 2ND, 1996, IT'S VERY CLEAR THAT  
 22 MR. DORNAN HAD ALREADY STARTED INVESTIGATION PRIOR TO  
 23 MARCH 6TH, BASED ON CALLS AND LETTERS FROM VIETNAMESE-AMERICAN  
 24 LEADERS.  
 25 I WAS NOT A VIETNAMESE-AMERICAN LEADER AT THE  
 26 TIME. AND IT'S ALREADY ONGOING INVESTIGATION. SO WHAT HE

1 FOUND OUT, HE COMMUNICATED IN THIS LETTER DATED APRIL 2ND TO  
2 O.R.R. AND THEN FOLLOWING THE SECOND -- THE NEXT STAGE OF HIS  
3 INVESTIGATION, HE CONTACTED THE INSPECTOR GENERAL OF THE  
4 DEPARTMENT OF STATE ON APRIL 30, 1996.

5 MR. HART: OBJECTION. MOVE TO STRIKE AS  
6 NONRESPONSIVE.

7 THE COURT: SUSTAINED. THAT WILL BE STRICKEN AND  
8 DISREGARDED.

9 YOU WILL NEED TO REASK THE QUESTION.

10 BY MR. HART:

11 Q DR. THANG, THE FIRST PARAGRAPH OF DORNAN'S  
12 APRIL 30 LETTER COMMUNICATES THAT HE HAS RECEIVED OPPOSITION  
13 TO FURTHER FUNDING OF S.E.A.R.A.C.; CORRECT?

14 A CORRECT.

15 Q FROM MULTIPLE PARTIES?

16 A YES.

17 Q OKAY. AND AT THE BOTTOM OF THAT PARAGRAPH, HE  
18 SAYS: "THEIR CONCERNS INCLUDE."

19 YOU SEE THAT?

20 A CORRECT.

21 Q REFERRING TO THE MULTIPLE PARTIES WHO CONTACTED  
22 HIM?

23 A CORRECT.

24 Q "THEIR CONCERNS INCLUDE" -- AND WE LOOK AT  
25 NUMBER 5 -- "MR. KHOA'S SELF-PROMOTION AS A PH.D."; CORRECT?

26 A CORRECT.

1 Q SO THAT'S A CONCERN OF THE MULTIPLE PEOPLE WHO  
2 HAVE CONTACTED HIM ACCORDING TO CLEAR ENGLISH LANGUAGE  
3 TRANSLATION OF THIS LETTER; RIGHT?

4 A YOU TOOK IT OUT OF CONTEXT. THAT'S WHAT I HAVE  
5 TRIED TO POINT OUT ALL ALONG FOR THE PAST 20 MINUTES; THAT I  
6 HAVE TO REFER TO HIS PRIOR LETTER DATED APRIL 2ND, WHERE IT  
7 SAID THAT: MY STAFF HAS CONTINUED OUR INVESTIGATION. BE  
8 AWARE THAT MEMBERS OF CONGRESS HAVE THE POWER TO INVESTIGATE  
9 INTO THE S.E.A.R.A.C. ORGANIZATION, INCLUDING OTHER AFFILIATED  
10 ORGANIZATIONS. AND WE HAVE FOUND -- WE HAVE FOUND THAT  
11 I.R.A.C./S.E.A.R.A.C. HAS MISREPRESENTED LE XUAN KHOA AS A  
12 DOCTOR.

13 SO HE DIDN'T JUST RELY ON THIS AS CONCERNS AND  
14 SUDDENLY HE JUST PASS IT ON TO THE INSPECTOR GENERAL. NO. HE  
15 DID A THOROUGH INVESTIGATION. AND HE INFORMED THE INSPECTOR  
16 GENERAL OF HIS FINDING, HAVE BEEN MULTIPLE TIMES VERIFIED BY  
17 HIS STAFF.

18 MR. HART: OBJECTION. MOVE TO STRIKE AS  
19 NONRESPONSIVE. I'M TRYING NOT TO INTERRUPT YOU.

20 THE COURT: GRANTED. THAT WILL BE STRICKEN AND  
21 DISREGARDED.

22 BY MR. HART:

23 Q DR. THANG, THIS ITEM NUMBER 5 IS ONE OF FIVE  
24 CONCERNS OF UNNAMED PEOPLE AND ORGANIZATIONS WHO ARE  
25 CONTACTING CONGRESSMAN DORNAN.

26 DO YOU UNDERSTAND THAT THAT'S WHAT THIS LETTER

1 SAYS?

2 A NO.

3 Q WHY DON'T YOU UNDERSTAND THAT?

4 A YES, IT WAS A CONCERN. AND NO, THAT DIDN'T  
5 MEAN THAT CONGRESSMAN DORNAN DIDN'T INVESTIGATE.

6 Q OKAY. I'LL GRANT THAT. I'M NOT SAYING HE  
7 DIDN'T INVESTIGATE. I DON'T KNOW WHAT HE DID.

8 BUT MY QUESTION IS: THIS ITEM NUMBER 5 IS NOT  
9 SOME FINDING OF AN INVESTIGATION. ACCORDING TO THIS LETTER,  
10 IT IS A CONCERN OF PEOPLE CONTACTING THE CONGRESSMAN?

11 A THAT'S WHY YOU NEED TO -- THIS IS AMBIGUOUS. I  
12 WOULD AGREE TO THAT. BUT YOU NEED TO REFER BACK TO THE  
13 APRIL 2ND, 1996.

14 Q WHY IS THIS AMBIGUOUS?

15 A BECAUSE IT DIDN'T SAY THAT, "THIS CAME OUT OF  
16 MY INVESTIGATION."

17 Q BECAUSE MAYBE THAT'S NOT WHERE IT CAME FROM?

18 MR. VOSS: OBJECTION. ARGUMENTATIVE, YOUR HONOR.

19 THE COURT: SUSTAINED.

20 BY MR. HART:

21 Q WERE YOU INVOLVED WITH AL SANTOLI AND  
22 CONGRESSMAN DORNAN WHEN THESE LETTERS WERE CREATED? DO YOU  
23 HAVE SOME BACKGROUND INFORMATION THAT WE DON'T KNOW ABOUT,  
24 ABOUT WHAT THEY MEANT WHEN THEY WROTE THESE THINGS?

25 MR. VOSS: OBJECTION. ASSUMES FACTS NOT IN EVIDENCE.  
26 MISCHARACTERIZES THE EVIDENCE.

1 THE COURT: OVERRULED. IT'S A QUESTION.

2 THE WITNESS: AS A --

3 THE COURT: WAIT. WAIT. WAIT.

4 MR. VOSS, YOU MUMBLED. SHE DIDN'T GET ALL OF  
5 YOUR OBJECTIONS ON THE RECORD.

6 MR. VOSS: I DON'T KNOW, BUT IT WAS DENIED ANYWAY.  
7 SO FAIR ENOUGH.

8 THE COURT: ALL RIGHT.

9 THE WITNESS: CAN YOU REPEAT THE QUESTION?

10 MR. HART: MR. HART WILL.

11 BY MR. HART:

12 Q THIS ITEM NUMBER 5, ON EXHIBIT 234, ABOUT  
13 MR. KHOA'S SELF-PROMOTION OF A PH.D., YOU SEE THAT?

14 A YES.

15 Q HAVE YOU SEEN ANYWHERE, IN ANY OF YOUR  
16 MATERIALS, WHERE HE PROMOTED HIMSELF AS A PH.D.?

17 A NO. WELL, EXCEPT FOR TWO DOCUMENTS. ONE  
18 ALREADY CITED BY MY COUNSEL, WHERE HE WAS A BOARD MEMBER, A  
19 DIRECTOR OF V.A.E.F. AND THERE'S ANOTHER ORGANIZATION THAT HE  
20 WAS ALSO A PART OF, AND I THINK THAT IT MIGHT HAVE BEEN  
21 REFERRED TO SOMEWHERE IN HERE, THAT HE ALSO -- HE WAS A BOARD  
22 CHAIR, ALSO PRESENTED HIMSELF HAS A PH.D.

23 BUT, AGAIN, IN MY ARTICLE, I WROTE "DOCTOR."

24 Q OKAY. ALL RIGHT. AND SO THE SENTENCE ACTUALLY  
25 SAYS: "SELF-PROMOTION AS A PH.D."

26 DID MR. SANTOLI GIVE YOU ANY MATERIALS IN



1 DORNAN'S OFFICE THAT DEMONSTRATED PROFESSOR KHOA SELF-PROMOTED  
 2 HIMSELF AS A PH.D.?  
 3 MR. VOSS: OBJECTION. RELEVANCE. 352.  
 4 THE COURT: OVERRULED.  
 5 THE WITNESS: HE DID SHARE WITH ME THAT COPY OF THE  
 6 C.V. THAT WAS ATTACHED TO THE GRANT APPLICATION.  
 7 BY MR. HART:  
 8 Q OKAY. AND THAT C.V. THAT WAS ATTACHED TO  
 9 SEVERAL GRANT APPLICATIONS DOES NOT SELF-PROMOTE  
 10 PROFESSOR KHOA AS A PH.D., DOES IT?  
 11 MR. VOSS: OBJECTION. RELEVANCE.  
 12 THE COURT: OVERRULED.  
 13 THE WITNESS: IT SAID, "DR. KHOA."  
 14 BY MR. HART:  
 15 Q IT SAYS, "DOCTORAL THESIS"?  
 16 A NO. THE C.V. SAID, "DR. KHOA."  
 17 Q OKAY. LET'S TAKE A LOOK AND SEE IF WE CAN FIND  
 18 THAT.  
 19 THE WITNESS: I'M NOT SURE WHETHER IT HAS BEEN  
 20 ADMITTED.  
 21 THE COURT: WE'RE GOING TO GET THE EXHIBIT.  
 22 MR. HART: I THINK YOU CAN FIND THE RESUME ATTACHED  
 23 TO EXHIBIT 221.  
 24 THE COURT: 221, YES, THAT WAS ADMITTED. SO, YES, IT  
 25 MAY BE PUBLISHED.  
 26 (DOCUMENT PUBLISHED.)

1 MR. NGUYEN: YOUR HONOR, WE'RE GOING BACK TO THE  
 2 APRIL 30TH LETTER.  
 3 THE COURT: OKAY. WE'RE GOING BACK -- 234?  
 4 MR. NGUYEN: YES.  
 5 THE COURT: IT MAY BE PUBLISHED. THANK YOU.  
 6 (DOCUMENT PUBLISHED.)  
 7 BY MR. HART:  
 8 Q DR. THANG, DO YOU REMEMBER WHEN CONGRESSMAN  
 9 SMITH RELEASED HIS ANTI-CPA AMENDMENT?  
 10 A IT'S IN MARCH 1995.  
 11 Q OKAY. AND WAS IT EVER PASSED?  
 12 A YES, IT'S PASSED THE HOUSE IN APRIL 1995. AND  
 13 THEN DESPITE OPPOSITION BY YOUR CLIENT AND DEPARTMENT OF  
 14 STATE, IT PASSED THE SENATE IN DECEMBER 1995. AND IT WENT IN  
 15 THE CONFERENCE SOMETIME A FEW MONTHS LATER. AND THEN IT REACH  
 16 THE DESK OF PRESIDENT CLINTON IN APRIL 1996.  
 17 Q AFTER THE STATE DEPARTMENT HAD WITHDRAWN ITS  
 18 OBJECTION; RIGHT?  
 19 A YES, DEFINITELY.  
 20 Q AND AFTER ALL THESE MATERIALS WERE RELEASED  
 21 ABOUT PROFESSOR KHOA?  
 22 A AFTER THE LETTER SENT BY DORNAN TO THE  
 23 INSPECTOR GENERAL OF THE DEPARTMENT OF STATE. I'M NOT SURE  
 24 WHETHER HE RELEASED THAT OR NOT.  
 25 Q WELL, YOU HAD COPIES OF THESE LETTERS; CORRECT?  
 26 MR. VOSS: OBJECTION. COUNSEL --

1 THE WITNESS: NO, IT'S NOT. IT'S NOT THE ONE I  
 2 REFERRED TO. IT'S THE ONE THAT WAS PRINTED ON  
 3 I.R.A.C./S.E.A.R.A.C. LETTERHEAD.  
 4 BY MR. HART:  
 5 Q OH, YOU'RE TALKING ABOUT THE BIO?  
 6 A THE BIO, YES.  
 7 Q OKAY. SO IS THERE ANY OTHER EVIDENCE THAT  
 8 YOU'RE AWARE OF SUPPORTING CONGRESSMAN DORNAN'S REPORT TO HIM  
 9 BY UNNAMED OTHERS THAT PROFESSOR KHOA WAS SELF-PROMOTING  
 10 HIMSELF A PH.D.?  
 11 A OH, YEAH. AS DOCTOR, IN -- HE TESTIFY -- HE  
 12 MENTIONED THAT BEFORE CONGRESS. AND CONGRESSIONAL RECORD  
 13 SHOWED THAT HE CLAIM HIMSELF TO BE A DOCTOR.  
 14 Q CONGRESSIONAL RECORDS SHOW THAT?  
 15 A YES. HE TESTIFIED --  
 16 MR. HART: MOVE TO STRIKE. HE'S TESTIFYING HEARSAY.  
 17 BY MR. HART:  
 18 Q WE DON'T HAVE THOSE RECORDS BEFORE US, DO WE?  
 19 THE COURT: WOULD YOU LIKE TO HEAR MY RULING?  
 20 MR. HART: YES, JUDGE.  
 21 THE COURT: OKAY. THEN GIVE ME A MOMENT TO LOOK  
 22 BACK.  
 23 OVERRULED. WHAT HE PURPORTS TO BE RELYING UPON  
 24 IS NOT OFFERED NECESSARILY FOR THE TRUTH, BUT WHAT HE BELIEVES  
 25 AND WHY HE RELIED UPON IT.  
 26 MR. HART: OKAY. JUDGE.

1 THE COURT: THE QUESTION WAS WHETHER YOU HAD COPIES  
 2 OF THESE LETTERS?  
 3 THE WITNESS: YES.  
 4 MR. HART: LET'S TAKE A LOOK AT YOUR MAY 25TH, 2020  
 5 ARTICLE, WHICH IS EXHIBIT 238, SPECIFICALLY PAGE 7.  
 6 AND I'D LIKE TO PUBLISH THAT, PLEASE.  
 7 THE COURT: AND YOU MAY.  
 8 (DOCUMENT PUBLISHED.)  
 9 BY MR. HART:  
 10 Q DO YOU SEE YOUR MAY 25, 2020 LETTER,  
 11 EXHIBIT 238, DR. THANG?  
 12 A YES.  
 13 Q AND IS THIS PART THAT'S SHOWN ON THE OVERHEAD  
 14 PART OF YOUR ARTICLE?  
 15 A THAT'S THE ENGLISH TRANSLATION OF MY ARTICLE,  
 16 YES.  
 17 Q OKAY. ANY PART OF THAT TRANSLATION YOU  
 18 DISAGREE WITH?  
 19 MR. VOSS: OBJECTION, YOUR HONOR. IT'S BEYOND THE  
 20 SCOPE AND RELEVANCE WITH RESPECT TO THE TRANSLATION.  
 21 THE COURT: OVERRULED.  
 22 THE WITNESS: I ALREADY EXPRESS SOME OF MY  
 23 RESERVATIONS DURING DEPOSITION. NOW, IF YOU ASK ME AGAIN, I  
 24 HAVE TO READ THE ORIGINAL IN VIETNAMESE AND COMPARE THAT TO  
 25 THIS TRANSLATION IN ENGLISH.  
 26 BY MR. HART:

1 Q WHAT I'M REALLY ASKING YOU TO DO IS TELL US  
 2 WHETHER THE QUOTE FROM YOUR ARTICLE, WHICH I'VE WRITTEN ON THE  
 3 WHITEBOARD, ACCURATELY STATES WHAT YOU INTENDED TO SAY IN YOUR  
 4 ARTICLE?  
 5 A I THINK THAT IN DEPOSITION I POINTED OUT THAT I  
 6 DIDN'T SAY HE HELD A DOCTORAL DEGREE.  
 7 (REPORTER ASKS FOR CLARIFICATION.)  
 8 THE WITNESS: IN MY DEPOSITION, I THINK I NOTED THAT  
 9 TO YOU, THAT MY ORIGINAL ARTICLE SAID THAT MR. KHOA FALSELY  
 10 CLAIMED TO BE A DOCTOR. AND, HERE, IT WAS TRANSLATED INTO  
 11 THAT HE HELD A DOCTORAL DEGREE. IT MIGHT BE JUST A MINOR  
 12 DIFFERENCE.  
 13 BY MR. HART:  
 14 Q ANY OTHER DIFFERENCE?  
 15 A THERE ARE TWO OTHERS THAT I CAN'T REMEMBER.  
 16 Q "THAT WAS A CRIMINAL OFFENSE" VERSUS "THAT IS A  
 17 CRIMINAL OFFENSE"?  
 18 A YES. BECAUSE IN VIETNAMESE, WE DON'T  
 19 DIFFERENTIATE TOO MUCH ABOUT PAST TENSE.  
 20 Q OKAY. SO DO YOU THINK YOU SAID "WAS" OR "IS"?  
 21 A IT COULD BE INTERPRETED AS EITHER "WAS" OR  
 22 "IS."  
 23 Q OKAY. GOING DOWN TO THE PARAGRAPH BELOW THE  
 24 HIGHLIGHTED PART, IT SAYS: "WHEN INVESTIGATED, MR. KHOA  
 25 EXPLAINED THAT OTHER PEOPLE SHOWED RESPECT TO HIM AND  
 26 ADDRESSED HIM BY THE TITLE 'DOCTOR' EVEN THOUGH HE OBJECTED."

1 Q YOU REMEMBER IT?  
 2 A I'M STILL LOOKING FOR THAT.  
 3 Q OKAY. 234, PAGE 1.  
 4 A CAN YOU REPEAT THAT, PLEASE?  
 5 Q 234.  
 6 A I'M THERE.  
 7 Q PAGE 1, ITEM 5, ROBERT DORNAN SAYS: "HOWEVER,  
 8 HE RECENTLY ADMITTED HE DOES NOT HAVE SUCH A DEGREE."  
 9 DO YOU SEE THAT?  
 10 A YES.  
 11 Q OKAY. SO IS THAT WHERE YOU GOT THIS  
 12 INFORMATION, WHEN INVESTIGATED, MR. KHOA EXPLAINED THAT OTHER  
 13 PEOPLE SHOWED RESPECT TO HIM AND ADDRESSED HIM BY "DOCTOR,"  
 14 EVEN THOUGH HE OBJECTED?  
 15 A AS I MENTIONED TO YOU, THERE'S SEVERAL  
 16 DOCUMENTS THAT I REFER TO. AND ONE OF THE DOCUMENTS I HAPPEN  
 17 TO FIND THAT IT'S IN THE BINDER OF EXHIBITS, IT'S AN ARTICLE  
 18 BY THE -- PUBLISHED IN A VERY WELL-RESPECTED PUBLICATION,  
 19 "TUDO," WHICH MEANS "FREEDOM," T-U-D-O, "FREEDOM," IN MARCH,  
 20 THAT TOLD THE STORY. SO IT WAS COVERED IN THE NEWS.  
 21 Q OKAY. SO ALL THAT MATTERS TO ME FOR THIS  
 22 QUESTION --  
 23 A YES.  
 24 Q -- IS WHETHER THE TWO DORNAN LETTERS ARE AT  
 25 LEAST PARTIALLY THE SOURCE FOR WHY YOU WROTE THIS?  
 26 A THOSE ARE PRIMARY SOURCES, PRIMARY AND

1 YOU SEE THAT?  
 2 A YES.  
 3 Q DID YOU GET THAT FROM DORNAN'S APRIL 2ND  
 4 LETTER?  
 5 A NO. PARTIALLY, IN THE DORNAN'S LETTER, BOTH  
 6 LETTERS, THEY DID REFER TO KHOA ADMITTING NOT BEING A DOCTOR.  
 7 BUT THEN, AS MENTIONED, IT WAS A SCANDAL IN OUR COMMUNITY, AND  
 8 THERE ARE MANY ARTICLES WRITTEN ABOUT THIS, TO THE POINT THAT  
 9 KHOA HAD TO COME OUT.  
 10 Q I'M GOING TO HAVE TO INTERRUPT YOU, DR. THANG.  
 11 I NEED YOU TO JUST BE RESPONSIVE TO MY QUESTION.  
 12 A ALL RIGHT.  
 13 MR. HART: MOVE TO STRIKE AS NONRESPONSIVE.  
 14 THE COURT: THAT WILL BE GRANTED. THAT LAST RESPONSE  
 15 WILL BE DISREGARDED.  
 16 BY MR. HART:  
 17 Q IN THE APRIL 2ND LETTER, CONGRESSMAN DORNAN  
 18 WRITES THAT: "RECENTLY, IN THE FACE OF PUBLIC INQUIRY,  
 19 MR. KHOA ADMITTED THAT HE IS NOT A DOCTOR."  
 20 YOU REMEMBER THAT?  
 21 A YES.  
 22 Q AND IN THE APRIL 30 LETTER, AT ITEM NUMBER 5,  
 23 IT SAYS: "HOWEVER, HE RECENTLY ADMITTED THAT HE DOES NOT HAVE  
 24 SUCH A DEGREE."  
 25 DO YOU SEE THAT?  
 26 A I DON'T SEE IT OR REMEMBER THAT.

1 SECONDARY SOURCES, BUT I MENTIONED TO YOU I HAD A BOX OF  
 2 DOCUMENTS ARCHIVED. SO I LOOKED THEM UP AND REVIEW A LOT OF  
 3 THEM AND THEN USE MANY OF THEM TO WRITE THIS ARTICLE.  
 4 Q OKAY. AND THE TWO DORNAN LETTERS ARE THE ONES  
 5 THAT YOU PRESENTED AS YOUR SOURCE FOR THE STATEMENTS THAT YOU  
 6 WROTE?  
 7 MR. VOSS: OBJECTION. MISCHARACTERIZES HIS ANSWER.  
 8 THE COURT: OVERRULED. IT'S A QUESTION.  
 9 MR. VOSS: THEN ASKED AND ANSWERED.  
 10 THE COURT: YOU MAY RESPOND, SIR.  
 11 THE WITNESS: NO. THOSE ARE TWO PRIMARY SOURCES, BUT  
 12 NOT ALL THE SOURCES.  
 13 BY MR. HART:  
 14 Q OKAY. THEY'RE THE TWO PRIMARY SOURCES?  
 15 A YES.  
 16 Q ALL RIGHT. AND SO WHEN WE MOVE LOWER IN THIS  
 17 ARTICLE, YOU SAY: "...EVEN THOUGH HE OBJECTED. BUT SUCH AN  
 18 EXPLANATION WAS NOT GOOD, BECAUSE MR. KHOA HIMSELF HAD CLAIMED  
 19 TO HAVE A DOCTORAL DEGREE IN THE RESUME HE ATTACHED TO THE  
 20 GRANT APPLICATION."  
 21 CAN YOU SHOW US WHAT RESUME ATTACHED TO A GRANT  
 22 APPLICATION PROFESSOR KHOA CLAIMED TO HAVE A DOCTORAL DEGREE?  
 23 MR. VOSS: YOUR HONOR, OBJECTION. ASKED AND ANSWERED  
 24 IN PLAINTIFF'S CASE-IN-CHIEF.  
 25 THE COURT: OVERRULED.  
 26 WE'LL DO IT QUICKLY. AND WE'RE GETTING ABOUT

1 TIME TO WRAP UP.  
 2 THE WITNESS: IT IS IN HIS BIO. I CALL IT RESUME,  
 3 BUT YOU CHARACTERIZE THAT AS A BIO.  
 4 BY MR. HART:  
 5 Q OKAY. AND WHERE DID YOU GET THE INFORMATION  
 6 THAT THAT BIO WAS ATTACHED TO A GRANT APPLICATION?  
 7 MR. VOSS: OBJECTION. ASKED AND ANSWERED. BEYOND  
 8 THE SCOPE OF THE DIRECT IN THE DEFENSE CASE.  
 9 THE COURT: OVERRULED.  
 10 THE WITNESS: AGAIN, I'VE OBTAINED THAT FROM  
 11 DR. SANTOLI, WHO SHOWED ME MULTIPLE GRANT  
 12 APPLICATIONS -- COPIES OF THOSE GRANT APPLICATIONS THAT HIS  
 13 OFFICE HAD RECEIVED FROM DIFFERENT FEDERAL AGENCIES, AND  
 14 EXPLAIN TO ME WHY THEY WERE THERE, ET CETERA.  
 15 AND HE ASK ME WHETHER I WOULD BE INTERESTED IN  
 16 GETTING ONE FULL COPIES. I SAID: NO, THAT'S TOO MANY PAGES.  
 17 JUST ONE C.V. WILL BE ENOUGH FOR ME TO KEEP.  
 18 THAT'S HOW I GOT IT.  
 19 BY MR. HART:  
 20 Q DR. THANG, THE TRUTH OF THE MATTER IS YOU DONT  
 21 HAVE ANY RESUME OR BIO ATTACHED TO A GRANT APPLICATION WHERE  
 22 PROFESSOR KHOA CLAIMED TO BE A DOCTOR, DO YOU?  
 23 MR. VOSS: OBJECTION. ARGUMENTATIVE. CALLS FOR A  
 24 LEGAL CONCLUSION.  
 25 THE COURT: OVERRULED.  
 26 THE WITNESS: I DO.

1 Q DR. THANG, WHY DID YOU INCLUDE THIS PARTICULAR  
 2 STATEMENT IN YOUR ARTICLE?  
 3 A WHICH STATEMENT?  
 4 Q THE STATEMENT WHERE WE'RE CLAIMING YOU DEFAMED  
 5 PROFESSOR KHOA, THE ONE THAT'S ON THE WHITEBOARD?  
 6 MR. VOSS: YOUR HONOR, OBJECTION. ASKED AND ANSWERED  
 7 ON THE DIRECT BY THE PLAINTIFF.  
 8 THE COURT: WE'RE GETTING TO THAT POINT, YES.  
 9 SUSTAINED.  
 10 BY MR. HART:  
 11 Q DID IT MATTER TO YOU, DR. THANG, WHETHER THIS  
 12 STATEMENT WAS TRUE OR NOT WHEN YOU PUBLISHED IT?  
 13 MR. VOSS: OBJECTION. ASKED AND ANSWERED TODAY.  
 14 THE COURT: SUSTAINED.  
 15 BY MR. HART:  
 16 Q WHEN YOU'RE PUBLISHING THIS ARTICLE, DID IT  
 17 EVER OCCUR TO YOU THAT THERE WAS A RISK THAT YOU COULD BE  
 18 PUBLISHING SOMETHING THAT WAS INCORRECT THAT WOULD HARM  
 19 SOMEONE?  
 20 MR. VOSS: OBJECTION. RELEVANCE.  
 21 THE COURT: OVERRULED.  
 22 YOU MAY RESPOND.  
 23 THE WITNESS: NO, BECAUSE IT'S JUST QUOTED FROM  
 24 DORNAN.  
 25 BY MR. HART:  
 26 Q OKAY. DO YOU UNDERSTAND WHAT THE WORD "QUOTE"

1 BY MR. HART:  
 2 Q OKAY. HAS THAT BEEN ADMITTED INTO EVIDENCE?  
 3 A THAT QUESTION MUST BE ASKED OF MY COUNSEL.  
 4 Q ARE YOU TALKING ABOUT THE BIO OR THE RESUME?  
 5 A THE BIO.  
 6 Q OKAY. SO THE QUESTION REMAINS: WHAT EVIDENCE  
 7 DO YOU HAVE THAT THAT BIO WAS EVER ATTACHED TO A GRANT  
 8 APPLICATION?  
 9 A FIRST OF ALL, I SAW IT BEING PULLED OUT OF A  
 10 GRANT APPLICATION.  
 11 SECONDLY, IF YOU INSPECT THAT BIO, YOU WILL SEE  
 12 THAT ON THE RIGHT-HAND CORNER, UP TOP RIGHT-HAND CORNER, IT  
 13 SAYS "APPENDIX C1." SO IT MEANS THIS MUST BE APPENDIX -- IT  
 14 WAS AN APPENDIX OF -- APPENDIX C OF A GRANT APPLICATION.  
 15 Q SO THAT'S YOUR EXTRAPOLATION OF DIFFERENT FACTS  
 16 YOU PULLED TOGETHER?  
 17 A NO, I SAW IT PULLED OUT --  
 18 THE COURT: WAIT.  
 19 THE WITNESS: I'M SORRY.  
 20 MR. VOSS: OBJECTION. ARGUMENTATIVE.  
 21 THE COURT: THANK YOU. I'VE JUST GOT TO MAKE SURE WE  
 22 DON'T HAVE EVERYBODY TALKING OVER ONE ANOTHER.  
 23 THE WITNESS: SORRY.  
 24 THE COURT: SUSTAINED. YOU MAY REPHRASE.  
 25 MR. HART: I'LL WITHDRAW THE QUESTION, JUDGE.  
 26 BY MR. HART:

1 MEANS?  
 2 A I PARAPHRASE, YES.  
 3 Q OKAY. YOU PARAPHRASED IT FROM --  
 4 A THE SAME INFORMATION.  
 5 Q OKAY. AND IN DOING THAT, IT DIDN'T OCCUR TO  
 6 YOU THAT IT MIGHT NOT BE TRUE AND THAT THAT LACK OF TRUTH  
 7 MIGHT HURT SOMEBODY?  
 8 MR. VOSS: OBJECTION, YOUR HONOR. ARGUMENTATIVE.  
 9 RELEVANCE. 352.  
 10 THE COURT: SUSTAINED.  
 11 MR. HART: NO FURTHER QUESTIONS, YOUR HONOR.  
 12 THE COURT: MR. VOSS.  
 13 MR. VOSS: YES, YOUR HONOR, A FEW.  
 14 REDIRECT EXAMINATION  
 15 BY MR. VOSS:  
 16 Q DR. THANG, I'D JUST LIKE TO GO THROUGH THE  
 17 TIMELINE AGAIN.  
 18 IS IT CORRECT TO SAY FROM EXHIBITS 233, 234,  
 19 AND YOUR LETTER THAT WAS EXHIBIT 18, THAT THE  
 20 INVESTIGATION -- THAT THERE WAS AN INVESTIGATION BY  
 21 CONGRESSMAN DORNAN THAT WAS COMMENCED ON JANUARY?  
 22 A YES. THERE WAS AN ONGOING INVESTIGATION.  
 23 Q IS IT ALSO CORRECT TO SAY THAT AS OF MARCH 6TH,  
 24 THERE WAS A REFERENCE TO NOT JUST THE LETTER TO MS. LIMON, BUT  
 25 ALSO THE REFERENCE TO DORNAN'S LETTER, A MARCH 6TH LETTER  
 26 DIRECTLY TO LE XUAN KHOA?

1 A YES.

2 Q SO TWO LETTERS ON MARCH 6TH?

3 A CORRECT.

4 Q AND THOSE LETTERS WERE INVESTIGATING ISSUES

5 INCLUDING THAT WE HAVE LEARNED THAT I.R.A.C./S.E.A.R.A.C. HAS

6 MISREPRESENTED LE XUAN KHOA AS A DOCTOR.

7 THAT WAS ONE THING REFERENCED; RIGHT?

8 A CORRECT.

9 Q AND THAT MR. KHOA HAD ADMITTED, IN THE FACE OF

10 PUBLIC INQUIRY, THAT HE IS NOT A DOCTOR; CORRECT?

11 A CORRECT.

12 Q ALL OF THAT HAPPENS BEFORE YOU EVER WRITE

13 EXHIBIT NUMBER 18 TO MS. LIMON; ISN'T THAT CORRECT?

14 A THAT'S CORRECT.

15 AND ON TOP OF THAT, THAT LETTER, MARCH 10, MADE

16 NO REFERENCE TO HIS BEING A DOCTOR OR NOT OR A PH.D. OR NOT.

17 Q WHICH IF YOU'LL JUST ANSWER MY QUESTIONS, I'LL

18 GET THERE.

19 A OH, SORRY.

20 Q BUT IT IS CORRECT, THEN, THAT IN THE APRIL 30

21 LETTER, THERE IS NOW THE CONGRESSMAN'S OFFICE REFERENCING A --

22 MR. HART: OBJECTION. LEADING.

23 THE COURT: WE HAVE BEEN LEADING HERE ON THIS

24 WITNESS, HEADING DOWN THAT PATHWAY AS WELL.

25 MR. VOSS: ALL RIGHT.

26 BY MR. VOSS:

1 A I'M SORRY. I NEVER MENTIONED. SORRY.

2 Q ISN'T IT CORRECT TO SAY THAT AT NO TIME DID YOU

3 EVER RAISE "PH.D." IN PARTICULAR IN ANY PUBLICATION YOU WROTE?

4 A THAT'S CORRECT. I NEVER RAISED THE ISSUE OF

5 PH.D.

6 Q AND WOULD YOU AGREE THAT THE ISSUE IS DOCTORAL

7 DEGREE, NOT PH.D. ?

8 A I AGREE.

9 Q AND YOUR EXPRESSION OF CONCERN WAS NOT PH.D.

10 BUT USE OF OR THE REPRESENTATION THAT HE WAS A DOCTOR; RIGHT?

11 A THAT'S CORRECT.

12 Q DR. THANG, I'D LIKE YOU TO TAKE A LOOK AT

13 EXHIBIT NUMBER 220.

14 A YES.

15 Q YOU MAY RECOLLECT -- YOU WERE HERE IN THE

16 COURTROOM -- MY INQUIRING OF MR. KHOA ABOUT THERE BEING

17 NUMEROUS OTHER DOCUMENTS REFERENCING HIM AS A DOCTOR.

18 WERE YOU HERE FOR THAT?

19 A YES.

20 Q OKAY. AND AT THAT TIME TRYING NOT TO, FRANKLY,

21 BORE THE JURY BY INTRODUCING TOO MANY EXHIBITS. I'D LIKE YOU

22 TO LOOK AT EXHIBIT NO. 220.

23 YOU EARLIER TODAY, JUST NOW, TESTIFIED TO

24 HAVING SEEN "PH.D." IN THE CONGRESSIONAL RECORD AND WERE

25 CHALLENGED ON THAT.

26 IS THIS THE DOCUMENT YOU ARE REFERRING TO?

1 Q SO YOU HAVE REFERENCED THE PUBLIC SCANDAL. I'D

2 LIKE TO KNOW A LITTLE MORE ABOUT THAT.

3 WAS THERE ANYTHING IN THE PUBLIC SCANDAL THAT

4 YOU WERE DESCRIBING THAT HAD TO DO WITH THIS PART OF THE

5 APRIL 2 LETTER REFERRING TO, "RECENTLY, IN THE FACE OF PUBLIC

6 INQUIRY, MR. KHOA ADMITTED HE IS NOT A DOCTOR"?

7 A YES. IT'S IN THE COMMUNITY NEWS, REFER HERE IN

8 THE LETTER BY CONGRESSMAN DORNAN, DATED APRIL 2ND, 1996. IT

9 WAS IN THERE. AND ALSO IN MANY OTHERS. I BELIEVE I SAW ONE

10 OF THOSE PUBLICATIONS FROM THE EAST COAST IN THE BINDER OF

11 EXHIBITS.

12 Q SO BY THE TIME WE GET TO APRIL 30, LESS THAN A

13 MONTH LATER, WE HAVE THE LETTER FROM DORNAN SAYING THAT

14 BEGINNING IN JANUARY OF '96, HE'S RECEIVED AN OVERWHELMING

15 NUMBER OF TELEPHONE CALLS.

16 IS THAT, DO YOU BELIEVE, AS A RESULT OF THIS

17 PUBLIC SCANDAL IN THE VIETNAMESE MEDIA?

18 A NO. IT PRECEDED THE SCANDAL.

19 Q OKAY.

20 A THEY CALL FOR OTHER CONCERNS. AND DURING THE

21 PROCESS, INVESTIGATION, DORNAN FOUND OUT THAT MR. KHOA WASN'T

22 A DOCTOR.

23 Q ISN'T IT CORRECT TO SAY THAT IN YOUR MARCH 10

24 LETTER, YOU NEVER MENTIONED PH.D. ?

25 A NO.

26 Q ISN'T IT CORRECT --

1 A THAT'S ONE OF SEVERAL DOCUMENTS.

2 Q THERE ARE OTHERS AS WELL, BUT YOU REFERENCED

3 THIS CONGRESSIONAL RECORD DOCUMENT?

4 A I REFERENCED OTHERS AS WELL.

5 Q SO THIS DOCUMENT THAT IS ENTITLED "HEARINGS

6 BEFORE A SUBCOMMITTEE ON APPROPRIATIONS OF THE HOUSE OF

7 REPRESENTATIVES, 99TH CONGRESS," IN IT REFERS TO, ON THE

8 SCHEDULE OF CLASSES AND SEMINARS ATTACHED AS 220-2, A

9 REFERENCE TO "DR. LE XUAN KHOA, I.R.A.C."; ISN'T THAT CORRECT?

10 A THAT'S CORRECT.

11 Q SO EVEN THOUGH YOU MAY NOT HAVE ADMITTED EVERY

12 SIGNAL DOCUMENT YOU SAID YOU WERE LOOKING AT WHEN YOU WROTE

13 WHAT YOU WROTE IN RESPONSE TO THE PUBLICATIONS ATTACKING YOU

14 BY MR. KHOA, THIS IS, IN FACT, THE CONGRESSIONAL RECORD ONE

15 THAT YOU VERY SPECIFICALLY REFERENCED A FEW MOMENTS AGO;

16 RIGHT?

17 A THAT'S CORRECT.

18 MR. VOSS: ALL RIGHT. I WOULD MOVE EXHIBIT NO. 220-1

19 AND -2 BE RECEIVED INTO EVIDENCE.

20 MR. HART: NO OBJECTION.

21 MR. VOSS: NOTHING FURTHER, YOUR HONOR.

22 THE COURT: THAT WILL BE ADMITTED.

23 (EXHIBIT 220 ADMITTED.)

24 MR. NGUYEN: PERMISSION TO PUBLISH, YOUR HONOR?

25 THE COURT: WHAT ARE WE PUBLISHING?

26 MR. NGUYEN: 220.

1 THE COURT: OKAY. THAT'S FINE. I JUST WANTED TO  
 2 MAKE SURE.  
 3 MR. NGUYEN: IT HAS BEEN ADMITTED.  
 4 THE COURT: YES. IT HAS BEEN ADMITTED AND MAY BE  
 5 PUBLISHED.  
 6 (DOCUMENT PUBLISHED.)  
 7 FURTHER CROSS-EXAMINATION  
 8 BY MR. HART:  
 9 Q DOCTOR, IN EXHIBIT 18, YOUR LETTER DOES NOT  
 10 MENTION ANY ISSUE RELATED TO PROFESSOR KHOA'S EDUCATIONAL  
 11 CREDENTIALS, DOES IT?  
 12 A IT DOESN'T.  
 13 Q AND THE REASON FOR THAT IS BECAUSE AL SANTOLI  
 14 HAD NOT GIVEN YOU ALL THE MATERIALS THAT DORNAN HAD COLLECTED,  
 15 INCLUDING THE C.V. THAT YOU WERE PARTICULARLY INTERESTED IN;  
 16 ISN'T THAT CORRECT?  
 17 A NO.  
 18 MR. VOSS: OBJECTION. COMPOUND.  
 19 THE COURT: WAIT. GO AHEAD.  
 20 MR. VOSS: OBJECTION. COMPOUND. MISCHARACTERIZES  
 21 THE WITNESS' TESTIMONY. VAGUE.  
 22 THE COURT: OVERRULED. IT'S A QUESTION. IT'S NOT A  
 23 REPRESENTATION OF ANY TESTIMONY.  
 24 YOU MAY RESPOND.  
 25 THE WITNESS: NO. FIRST OF ALL, I DIDN'T DRAFT THAT  
 26 LETTER. BUT LOOKING BACK, I WOULD NOT EVEN MENTION THAT

1 EDUCATIONAL CREDENTIALS WAS NOT IMPORTANT IN MARCH OF 1996.  
 2 AT SOME POINT AFTER 1996, IT WAS IMPORTANT IN ORDER TO RENDER  
 3 HIM A NOT-CREDIBLE WITNESS BEFORE CONGRESS.  
 4 ISN'T THAT WHAT YOU JUST EXPLAINED?  
 5 A NO. I THINK YOU MIX UP THE TWO DIFFERENT  
 6 CONCEPTS. ONE, I MENTION THERE'S CO-RELATION. I DIDN'T SAY  
 7 CAUSE AND EFFECT. I DIDN'T SAY "MOTIVE" AND "CONSEQUENCE." I  
 8 JUST EXPRESSED THAT THERE WAS A CORRELATION BETWEEN THE TWO  
 9 EVENTS.  
 10 Q WHAT ARE THE TWO EVENTS THAT ARE CO-RELATED?  
 11 A THE LETTER DATED APRIL 30, 1996, FROM DORNAN TO  
 12 THE INSPECTOR GENERAL OF THE DEPARTMENT OF STATE. AND A FEW  
 13 DAYS -- A WEEK LATER, THE DEPARTMENT OF STATE DROPPED ALL  
 14 OPPOSITION.  
 15 Q OKAY. AND SO THE APRIL 30 LETTER, WHICH  
 16 INCLUDED CHARGES ABOUT PROFESSOR KHOA SELF-PROMOTING PH.D.,  
 17 WAS IMPORTANT TO RENDER HIM A NOT-CREDIBLE WITNESS, WHICH  
 18 CAUSED THE STATE DEPARTMENT TO DROP THEIR OBJECTION TO THE  
 19 ANTI-CPA AMENDMENT?  
 20 MR. VOSS: YOUR HONOR, OBJECTION. BEYOND THE SCOPE  
 21 OF MY REDIRECT.  
 22 MR. HART: IT'S FOLLOW-UP, JUDGE.  
 23 THE COURT: I DON'T NEED TO HEAR ARGUMENT.  
 24 BUT, NO, IT WAS OPENED UP HERE BY THIS  
 25 STATEMENT. SO OVERRULED. YOU MAY RESPOND.  
 26 THE WITNESS: YES, YOU'RE ASKING ME TO SPECULATE. I

1 BECAUSE THAT'S OF NO IMPORTANCE TO US AT THE TIME. AND THAT  
 2 WAS MARCH 10TH.  
 3 BY MR. HART:  
 4 Q OKAY. MARCH 10TH, NO IMPORTANCE.  
 5 OKAY. SO IF IT HAD NO IMPORTANCE IN MARCH, WHY  
 6 DID IT HAVE IMPORTANCE FOUR OR FIVE YEARS LATER?  
 7 A ONLY AFTER THE DEPARTMENT OF STATE DROPPED ITS  
 8 OPPOSITION TO CONGRESSMAN SMITH LEGISLATION. EARLIER, I  
 9 EXPLAINED THAT MR. KHOA COULD NO LONGER SERVE AS A CREDIBLE  
 10 WITNESS TO SUPPORT THE DEPARTMENT OF STATE'S POSITION.  
 11 Q SO THAT WAS REALLY THE ULTIMATE PURPOSE OF THE  
 12 PUBLICATION OF THESE CHARGES, CORRECT, TO --  
 13 MR. VOSS: OBJECTION.  
 14 MR. HART: I'M STILL ASKING MY QUESTION, PLEASE.  
 15 BY MR. HART:  
 16 Q -- WAS TO RENDER PROFESSOR KHOA AN UNCREDBLE  
 17 WITNESS BEFORE CONGRESS, SPECIFICALLY ON THE ANTI-CPA  
 18 AMENDMENT ISSUE?  
 19 THE COURT: WAIT.  
 20 MR. VOSS: OBJECTION. MISCHARACTERIZES THE EVIDENCE  
 21 AS CHARGES AND VAGUE AS TO WHO IS MAKING THEM.  
 22 THE COURT: AND TIMING, TOO.  
 23 I'M GOING TO SUSTAIN AS TO VAGUENESS. YOU MAY  
 24 REPHRASE IT. AND THEN WE'LL GO FROM THERE.  
 25 BY MR. HART:  
 26 Q YOU SAID THAT THIS ISSUE OF MR. KHOA'S

1 DON'T THINK I CAN SPECULATE. HOWEVER, LET ME POINT OUT  
 2 THAT --  
 3 THE COURT: YOU MAY CONTINUE.  
 4 THE WITNESS: LET ME POINT OUT THAT  
 5 CONGRESSMAN DORNAN DIDN'T JUST WRITE THE DEPARTMENT OF STATE.  
 6 HE WROTE BEFORE TO THE O.R.R. AND TO KHOA HIMSELF GIVING HIM  
 7 THE OPPORTUNITY TO CLARIFY HIS EXPLANATION; RIGHT?  
 8 AND KHOA KNEW DORNAN. HE SERVED -- DORNAN  
 9 SERVED ON THE ADVISORY COMMITTEE OF S.E.A.R.A.C. HE WAS NO  
 10 STRANGER TO MR. KHOA. KHOA KNEW I WAS VERY CLOSE TO  
 11 DR. SANTOLI.  
 12 SO I THINK IT'S A DUE PROCESS EXERCISE FROM THE  
 13 OFFICE OF CONGRESSMAN DORNAN. IT WENT ON FOR FOUR MONTHS.  
 14 BY MR. HART:  
 15 Q A DUE PROCESS. DID YOU MEAN DUE DILIGENCE?  
 16 A YEAH, DUE DILIGENCE. SORRY. THANK YOU.  
 17 Q SO I THINK I'M BEGINNING TO UNDERSTAND.  
 18 CAN YOU TELL ME WHAT THE CO-RELATION IS BETWEEN  
 19 THE APRIL 30 LETTER AND THE STATE DEPARTMENT DROPPING ITS  
 20 OBJECTION TO THE ANTI-CPA AMENDMENT.  
 21 A MR. KHOA WAS A VERY POTENT WITNESS ON BEHALF OF  
 22 THE DEPARTMENT OF STATE, BECAUSE HE IS A VIETNAMESE; HE WAS  
 23 WELL KNOWN FOR DEFENDING THE RIGHTS OF THE BOAT PEOPLE.  
 24 BUT AT HEARINGS ON THAT LEGISLATION, HE CLAIMED  
 25 THAT: HE GOT FUNDING FROM THE DEPARTMENT OF STATE FOR THREE  
 26 YEARS. WITH THAT FUNDING, HE TRAVELED VIETNAM MULTIPLE TIMES,

1 AND HE SAW NO INSTANCE OF ANY RETURNEE BEING PROSECUTED IN  
2 VIETNAM, AND, THEREFORE, THERE'S NO NEED FOR THE LEGISLATION  
3 INTRODUCED BY CONGRESSMAN SMITH. ALL THESE BOAT PEOPLE  
4 DESERVE TO BE SENT BACK BECAUSE THEY WILL NOT FACE  
5 PERSECUTION.  
6 WE HAD PLENTY EVIDENCE TO THE CONTRARY. THAT'S  
7 WHY CHRIS SMITH BELIEVE US AND, AT MY REQUEST, HE INTRODUCED  
8 THAT LEGISLATION THAT WE NOW CALL THE ANTI-CPA LEGISLATION.  
9 Q OKAY. I'M LEARNING MORE AND MORE.  
10 WHAT WAS THE TESTIMONY OF PROFESSOR KHOA ABOUT  
11 RETURNING REFUGEES?  
12 MR. VOSS: YOUR HONOR, OBJECTION. BEYOND THE SCOPE.  
13 RELEVANCE.  
14 THE COURT: WE'RE GETTING -- LET'S WRAP THIS UP HERE  
15 BECAUSE WE'RE -- I MEAN, HE OPENED IT, BUT -- MR. VOSS.  
16 MR. VOSS: I UNDERSTAND, YOUR HONOR.  
17 THE WITNESS: YES. CONGRESSMAN SMITH HELD A SERIES  
18 OF THREE HEARINGS, CONGRESSIONAL HEARINGS, AFTER HIS  
19 LEGISLATION HAD PASSED THE HOUSE, BECAUSE HE ANTICIPATED THAT  
20 MR. KHOA AND THE DEPARTMENT OF STATE WOULD CONTINUE TO OPPOSE  
21 IT IN THE SENATE.  
22 SO HE -- CONGRESSMAN SMITH CONVENED A SERIES OF  
23 THREE HEARINGS. AND KHOA SUBMITTED STATEMENTS IN TWO OF THOSE  
24 HEARINGS. IN ONE OF THOSE STATEMENTS, HE DECLARED THAT THERE  
25 WAS NO PERSECUTION IN VIETNAM THAT HE HAD EVER FOUND DURING  
26 HIS MULTIPLE TRAVELS TO VIETNAM FUNDED BY THE DEPARTMENT OF

1 Q FOLLOWING PROFESSOR KHOA'S TESTIMONY, IS THAT  
2 WHEN THE LEADERS FROM DORNAN'S DISTRICT BEGAN TO CONTACT HIM  
3 IN OPPOSITION?  
4 MR. VOSS: OBJECTION. RELEVANCE. SPECULATION.  
5 THE COURT: SUSTAINED.  
6 MR. HART: LAST QUESTION.  
7 BY MR. HART:  
8 Q WAS THERE ANY WAY, AS YOU RECALL, TO PASS THE  
9 ANTI-CPA AMENDMENT WHILE PROFESSOR KHOA WAS OPPOSING IT ON  
10 BEHALF OF THE STATE DEPARTMENT?  
11 MR. VOSS: OBJECTION. SPECULATION AND RELEVANCE.  
12 THE COURT: SUSTAINED.  
13 MR. HART: OKAY. NO FURTHER QUESTIONS.  
14 THE COURT: ALL RIGHT. MAY THIS WITNESS STAND DOWN?  
15 MR. VOSS: I HAVE ONE.  
16 FURTHER REDIRECT EXAMINATION  
17 BY MR. VOSS:  
18 Q DR. THANG, YOU HEARD QUESTIONS ABOUT IMPORTANCE  
19 AND AT CERTAIN TIMES. WHEN YOU WROTE THE WORDS ON THE BOARD,  
20 DID YOU WRITE THOSE WORDS AFTER FIRST REVIEWING SUBSTANTIAL  
21 INFORMATION?  
22 A YES. I DID HAVE TO GO BACK TO MY OFFICE, LOOK  
23 UP ALL THE DOCUMENTS. LUCKILY, I ARCHIVE THEM QUITE WELL.  
24 MR. VOSS: THANK YOU.  
25 NOTHING FURTHER, YOUR HONOR.  
26 MR. HART: ONE COMMENT, JUDGE.

1 STATE.  
2 AND, THEREFORE, A LOT OF MEMBERS OF CONGRESS  
3 DID BELIEVE HIM, BECAUSE HE WAS A WELL-RESPECTED PERSON IN THE  
4 COMMUNITY, KNOWN FOR DEFENDING THE RIGHTS OF THE BOAT PEOPLE.  
5 BUT NOW HE TESTIFY THAT THESE PEOPLE, IT'S OKAY FOR THEM TO GO  
6 BACK TO VIETNAM.  
7 BY MR. HART:  
8 Q HE SAID THEY WERENT BEING PROSECUTED OR  
9 PERSECUTED?  
10 A CORRECT, NO PERSECUTION. NOT "PROSECUTED." NO  
11 PERSECUTION WHATSOEVER, NOT A SINGLE CASE.  
12 Q AND YOU'RE TELLING US THAT THAT TESTIMONY  
13 INTERFERED WITH THE ANTI-CPA AMENDMENT --  
14 MR. VOSS: OBJECTION. RELEVANCE, YOUR HONOR.  
15 BY MR. HART:  
16 Q -- OR NECESSITATED THE ANTI-CPA AMENDMENT?  
17 A IT OPPOSED. IT TRIED TO DEFEAT.  
18 THE COURT: YOUR CLIENT JUMPED IN.  
19 THE WITNESS: SORRY.  
20 MR. VOSS: I OBJECTED. YOU HAVE TO WAIT. AND I  
21 OBJECT ON RELEVANCE.  
22 THE COURT: YES. I'M GIVING SOME LEEWAY HERE, AND  
23 THIS IS GETTING MUCH TOO FAR AFIELD.  
24 MR. HART: OKAY. I'M LOATHE TO ARGUE WITH THE JUDGE,  
25 BUT I'LL TRY TO CLEAN IT UP, YOUR HONOR.  
26 BY MR. HART:

1 THE COURT: I HOPE IT'S A QUESTION AND NOT A COMMENT.  
2 MR. HART: OKAY. YES, IT IS.  
3 FURTHER RECROSS-EXAMINATION  
4 BY MR. HART:  
5 Q DR. THANG, YOU TOLD ME IN YOUR DEPOSITION THAT  
6 YOU HAD NO IDEA WHETHER THE STATEMENT WAS TRUE OR NOT.  
7 MR. VOSS: YOUR HONOR, MAY WE BE HEARD?  
8 THE COURT: MAY WE JUST HAVE AN OBJECTION.  
9 MR. VOSS: I OBJECT TO THE QUESTION AS ASSUMING FACTS  
10 NOT IN EVIDENCE, ARGUMENTATIVE, AND IRRELEVANT.  
11 MR. HART: I'LL WITHDRAW THE QUESTION.  
12 THE COURT: ALL RIGHT.  
13 MR. VOSS: IT'S BEEN ASKED AND ANSWERED.  
14 MR. HART: I'LL WITHDRAW. NO FURTHER QUESTIONS.  
15 THE COURT: THANK YOU VERY MUCH, DOCTOR. YOU MAY  
16 STEP DOWN.  
17 (CONCLUSION OF NGUYEN DINH THANG TRIAL TESTIMONY ON  
18 NOVEMBER 14, 2024.)  
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REPORTER'S CERTIFICATE

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 \_\_\_\_ DAY OF \_\_\_\_\_, 2024.

\_\_\_\_\_  
MICHELLE LOTT-MEYERHOFER, CSR NO. 8226  
OFFICIAL REPORTER PRO TEM

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