

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE

LE XUAN KHOA,

Plaintiff,

vs.

No. 30-2021-01201012

CU-DF-CJC

NGUYEN DINH THANG; BOAT

PEOPLE S.O.S., INC.;

DOES 1-100,

Defendants.

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DEPOSITION OF

KHOA XUAN LE

Monday, July 29, 2024

10:06 A.M. - 12:36 P.M.

2030 Main Street

Suite 1300

Irvine, California

Nancy Collier Hamada, CSR No. 5819

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INFORMATION REQUESTED

(NONE)

WITNESS INSTRUCTION NOT TO ANSWER

(NONE)

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1 DEPOSITION OF KHOA XUAN LE

2 Monday, July 29, 2024

3

4 KHOA XUAN LE,

5 having been first duly sworn, testifies as

6 follows:

7

8 EXAMINATION

9 BY MR. VOSS:

10 Q Good morning. Would you state your name,  
11 please?

12 A Yeah, my name is Khoa. That's the first  
13 name. The last name is Le.

14 By the way, I just explained to her a  
15 while ago about why we have the first name as a  
16 last name. Culturally speaking, I think we have  
17 more good reasons to do that because the root  
18 should come first, so we start with the route and  
19 then the first name.

20 MR. HART: Okay. Now here's a good  
21 opportunity for me to tell you that you need to  
22 just answer his questions.

23 THE WITNESS: Just by the way, she asked  
24 me.

25 MR. HART: You know what, every question

1 will have that kind of an opportunity, and if we  
2 start taking those opportunities, we'll be here  
3 all day and night. So try to answer just what he  
4 says, and when we're on breaks we'll have more  
5 casual conversations, okay?

6 THE WITNESS: Yeah.

7 BY MR. VOSS:

8 Q Obviously the most important thing is if  
9 you do not hear or understand a question that I'm  
10 giving you, please ask me to repeat it.

11 A Yes.

12 Q All right.

13 A Now so far no problem, but maybe later.

14 Q I will do my best to enunciate clearly.

15 A Thank you.

16 Q All right. And how would you like to be  
17 addressed today?

18 A Just Khoa or whatever you want.

19 Q And it's "Khoa," you actually say the  
20 "K"?

21 A Pronounced "Khoa."

22 Q All right. I've been doing it wrong all  
23 this time. Thank you for correcting me.

24 So Khoa, have you ever had your  
25 deposition taken before?

1           A       No.

2           Q       Have you had an opportunity to talk to  
3 your lawyer about the process without telling  
4 anything he said?

5           A       I know nothing and I don't know who I can  
6 talk to about that.

7           Q       Have you spoken to your lawyer about how  
8 the deposition will work?

9           A       Yeah, just I know that there would be a  
10 legal deposition, but I thought that maybe that's  
11 kind of a compensation whatever, but I have no  
12 idea until recently that he told me.

13          Q       Okay. Well, there are a few things then  
14 that I just want to cover so that we can be  
15 productive with our time, all right?

16          A       Uh-huh.

17          Q       One of them that I'm going to start with  
18 is probably the most important one for your  
19 lawyer. When I ask you a question, give a  
20 moment's pause in case he has an objection to my  
21 question.

22          A       I see.

23          Q       Do you understand that?

24          A       Uh-huh.

25          Q       All right. And I don't want you to guess

1 at anything today.

2 A I know.

3 Q Do you know the difference between a  
4 guess and an estimate?

5 A Yeah.

6 Q So if I was to ask you to tell me how big  
7 that conference room table was over there, without  
8 looking at it, you couldn't do that, could you?

9 A I couldn't do what?

10 Q Tell me how big the conference room table  
11 was in another room. You'd be guessing; right?

12 A Uh-huh.

13 Q But if I asked you how long this table  
14 was, you could give me an estimate; right?

15 A Yeah, I can.

16 Q Okay. The difference between a guess and  
17 an estimate.

18 A Uh-huh.

19 Q I'm entitled to your best estimates, but  
20 I don't want you to guess at the answer to any  
21 question.

22 A Right, okay.

23 Q Understand that?

24 A Yeah.

25 Q And just real briefly then, we are in



1 Orange County. We don't usually do these  
2 admonitions anymore, but since he's new to this,  
3 when we're all done, this fine young woman seated  
4 to my right is going to prepare a booklet, and in  
5 it will be everything we say here today, and you  
6 will have an opportunity to make changes to the  
7 answers that you give to my questions.

8 A Uh-huh.

9 Q Okay. But I will have the opportunity at  
10 trial to comment on the fact that you made the  
11 change, so it's important that you give me your  
12 best answers today.

13 A Okay.

14 Q Understand that?

15 A Yeah.

16 Q And your testimony here today, although  
17 this is a somewhat informal setting, is just as  
18 serious as though you were testifying in a court  
19 of law. Do you understand that?

20 A Yeah.

21 Q All right. Let's begin. Khoa, in your  
22 career is it correct to say that the end of your  
23 career was spent with an entity called SEARAC?

24 A Uh-huh.

25 Q And what did SEARAC stand for?

1           A       SEARAC is Southeast Asia Resource Action  
2 Center.

3           Q       And before it became SEARAC it was IRAC.  
4 Is that --

5           A       It was IRAC. That's Indochina.  
6 Indochina is kind of a fringe name of three  
7 countries, Cambodia, Laos and Vietnam, so it has  
8 some kind of colonial overtone. That's why we  
9 need to change it.

10          Q       So as we look through documents in this  
11 case --

12          A       Yes.

13          Q       -- and we see IRAC and then SEARAC, those  
14 are actually the same entity; correct?

15          A       The same thing.

16          Q       Just changed the name?

17          A       Just change it.

18          Q       And in the period -- strike that.

19                   When did you first become involved with  
20 IRAC?

21          A       I became involved with IRAC since 1979, a  
22 few months after they form. I was not from the  
23 very beginning, but just later.

24          Q       Okay. And then what was your position  
25 when you first joined IRAC?

1           A       I worked as a consultant. They hired me  
2 a few days a week.

3           Q       And eventually you became --

4           A       Eventually they want me to be -- to apply  
5 for the position of deputy director.

6           Q       And is that the last position you were in  
7 before you retired?

8           A       Right, yeah.

9           Q       Okay. And what duties did you have as  
10 deputy director?

11          A       I held the executive director in telling  
12 about the -- first of all, I have some training  
13 inside the established IRAC and the board also  
14 about the culture of the Indochinese people, okay,  
15 so you understand, and then the history why we  
16 left the country, because of the fall of Saigon to  
17 the communist.

18                   And also I explain about our culture. We  
19 don't have the habit to leave the country. We  
20 stay. We stay on. For more than 2,000 years of  
21 history, we never left the country, even when  
22 there was a big war or a famine, okay, but we  
23 never leave the country until the communist came.

24          Q       It is unusual for me to permit your  
25 attorney to assist, but I'm going to allow him to

1 try to use that as an example of how we answer  
2 questions here today because I promised him that  
3 we would be done probably early, but --

4 A Okay, I understand.

5 Q -- at this pace, we might not be.  
6 Would you like to try again?

7 MR. HART: I think --

8 THE WITNESS: I see. Unless you ask me,  
9 don't explain.

10 MR. HART: You're doing fine. Just keep  
11 the answers short, and try to make them mostly  
12 responsive to what he's asking you.

13 THE WITNESS: Right, okay.

14 BY MR. VOSS:

15 Q In and amongst your duties with SEARAC,  
16 did you have any involvement with a publication  
17 called The Bridge?

18 A Yes, I am actually -- I started The  
19 Bridge. Before that, they don't have it until I  
20 came.

21 Q And when did you start The Bridge?

22 A In 1984.

23 Q What was your position with The Bridge?

24 A I'm editor, chief editor.

25 Q So what was this purpose of this

1 publication?

2 A The purpose of the publication? The  
3 purpose is to educate the public about why the  
4 Vietnamese came to the U.S. and why we need help  
5 and how we can participate and contribute  
6 eventually to the American society. So I need to  
7 help the public, and on the other hand, I help  
8 organize the refugee organizations and train them  
9 in terms of how we can integrate successfully in  
10 American society.

11 Q The articles that were written in The  
12 Bridge, did you write them?

13 A I write the editorial, the letters from  
14 the editor on the first page.

15 Q And were there other things in the  
16 publication other than the editorial?

17 A Yes. Sometimes, sometimes I wrote about  
18 that, an issue on cultural integration, for  
19 example, or why we need to bring -- to accept more  
20 refugees in the U.S., and how we can help those  
21 stuck in the camps, for example, yeah.

22 Q Did you have occasion to write editorials  
23 about the ROVR program, which is, for the benefit  
24 of our reporter, R-O-V-R?

25 A Yeah, we have lots of articles about ROVR

1 because ROVR is my initial idea when I first  
2 started.

3 Q And ROVR came after what other program?

4 A The major article was my speech at  
5 Stanford University in 1990, five years before the  
6 problem. I start with that because I work with  
7 the policymakers. I'm sorry, I should wait for  
8 you to ask if I need to explain.

9 Q Very well.

10 One thing just for the record, Mr. Hart.  
11 Is it correct to say that no additional documents  
12 are being produced today in response to the  
13 deposition notice other than what were previously  
14 produced either in the initial production or the  
15 supplemental production?

16 MR. HART: Yes, with this caveat: There  
17 are additional records that are not responsive to  
18 anything that you've asked for that he thinks are  
19 important. He has them here in his notebook today  
20 which I let Steve look through while we were  
21 waiting for you to arrive.

22 MR. VOSS: Perfect.

23 MR. HART: So he has a heads up on what's  
24 in there. This is everything that we produced  
25 plus a few more items.

1           THE WITNESS: Yeah, this is evidence if  
2 we need to show you.

3 BY MR. VOSS:

4           Q All right. Did you keep -- because you  
5 produced -- strike that.

6           You have produced a number of pages from  
7 The Bridge in your document production.

8           A Not many, but some.

9           Q Okay. How did you select which documents  
10 from The Bridge to produce?

11          A People send to me. They send and I  
12 review it, and then I see whether it fits in there  
13 or not, it's suitable.

14          MR. HART: I think he's asking something  
15 different. Why among all The Bridge articles that  
16 you could get your hands on did you pick the ones  
17 that we gave to him? Do you remember how you  
18 chose those particular documents to be as  
19 responsive to what they were asking about?

20          THE WITNESS: Uh-huh. Well, those are  
21 all topics that are related to refugee issues,  
22 especially on policy issues because I work with  
23 policymakers.

24 BY MR. VOSS:

25          Q So were there other issues of The Bridge

1 that you did not produce because you thought that  
2 it didn't relate to policy issues?

3 A Non-refugee issues, we are not interested  
4 in that.

5 Q Right. So did you have other issues of  
6 The Bridge publication that you have in your  
7 possession that you did not produce?

8 A No.

9 Q So coincidentally, the only copies of The  
10 Bridge that you had in your possession were  
11 related to policy issues?

12 A Yeah, to policy issues, yeah, and then  
13 how to integrate into society. That means  
14 education to the refugees.

15 Q And do you have any other issues of The  
16 Bridge in your possession other than these?

17 A I don't think so.

18 Q Are you sure?

19 A To audiences, the public, the American  
20 public, and then the refugee community.

21 Q As editor-in-chief of The Bridge, did you  
22 review the publication prior to it being  
23 disseminated to the public?

24 A Yes, I review. I read everything before  
25 I decide whether we should print it or not.



1 Q Okay. And that was your decision as to  
2 whether or not to print anything that was in the  
3 publication; is that right?

4 A Right.

5 Q Do you -- strike that.

6 In addition to your role as  
7 editor-in-chief of The Bridge, did you have other  
8 responsibilities prior to your retirement?

9 MR. HART: Hold on. Other  
10 responsibilities?

11 MR. VOSS: At SEARAC.

12 MR. HART: At SEARAC, okay.

13 THE WITNESS: Responsibility for what?  
14 My responsibility for what?

15 MR. HART: What were your job --

16 MR. VOSS: What did you do?

17 MR. HART: -- responsibilities at SEARAC  
18 before you retired? I think he's looking in the  
19 larger sense.

20 THE WITNESS: Yeah. Before my  
21 retirement?

22 BY MR. VOSS:

23 Q Yes.

24 A My responsibility is with SEARAC. I have  
25 to do my work.

1 Q What was your work, what did you do?

2 A Okay. No. 1, I work with the  
3 policymakers, specifically about how we can help  
4 the refugees, what kind of program we need to help  
5 them to meet their needs so that they can become  
6 contributing members of society, not to depend on  
7 welfare or whatever, okay, and that we need  
8 program. I am -- No. 1.

9 We are not service provider, so SEARAC,  
10 we did not provide direct service to refugees.  
11 That's the community, and that's the organization  
12 and Social Services who do it. We are just  
13 advocate. We advocate for refugees, so that means  
14 the policy and program development, yes, that's  
15 it.

16 So that's my responsibility is to develop  
17 policy and program for SEARAC, and that means for  
18 the government.

19 Q How was SEARAC funded, where did its  
20 money come from?

21 A I'm sorry?

22 Q Where did SEARAC's money come from?

23 A Oh, I see. Where did the funding come  
24 from maybe; right?

25 Q Uh-huh.

1           A       Basically very little -- initially, very  
2 little from the government. We basically applied  
3 for foundation, private foundation people,  
4 particularly I can say that initially the Ford  
5 Foundation supported us for many years until we  
6 could stand on our own.

7           Q       When did you start to apply for  
8 government money?

9           A       The government? Around when we start to  
10 develop the program to train the refugee community  
11 because we tend to form groups, what you call  
12 Mutual Assistance Associations or MAAs, and then  
13 they form Mutual Assistance Associations, and then  
14 we train them how they can get help from state or  
15 from federal, okay, and then how could they  
16 develop the project, what kind of project they  
17 could develop.

18                   MR. HART: What year did you start doing  
19 that?

20                   THE WITNESS: Oh, it's around the early  
21 1980s.

22                   MR. HART: Early eighties?

23                   THE WITNESS: Yeah, early eighties.

24 BY MR. VOSS:

25           Q       So for a number of years -- is it fair to

1 say that for a number of years until your  
2 retirement in 1997, that SEARAC sought money from  
3 the government for its program?

4 A Yeah, so we started to get something from  
5 the Office of Refugee Resettlement, not from the  
6 State Department until much later.

7 Q I'm just asking the government in  
8 general, is it fair to say that SEARAC obtained  
9 funding from the United States Government?

10 A Yes.

11 Q And that would be up till your retirement  
12 as far as you know; correct?

13 A Yes.

14 Q And your retirement was in what year?

15 A I retired in 1986 or '87. You can say  
16 between the two because I --

17 Q Is it more accurate to say it was '97,  
18 not '87?

19 A Yeah, definitely '97, but I start  
20 retirement in '86 because I spent half time to  
21 teach when I moved to teach, to receive my job at  
22 Johns Hopkins, so that's half, half between '86  
23 and '87.

24 Q During the time you taught at Johns  
25 Hopkins, you were still employed by SEARAC; is

1 that correct?

2 A Yes, yes, full time SEARAC.

3 Q Okay. How did SEARAC go about getting  
4 money from the government?

5 A Well, you write a proposal to submit to  
6 the government.

7 Q What kind of a proposal?

8 A Sometimes we write proposal in response  
9 for what they call the RFP something. I don't  
10 know what it stands for.

11 Q That's okay.

12 MR. HART: Request for proposal.

13 THE WITNESS: Request for proposal, yes,  
14 yeah.

15 BY MR. VOSS:

16 Q So SEARAC would prepare an application in  
17 response to a request for proposal?

18 A Request for proposal.

19 Q And that was how they would get money  
20 from the government?

21 A Yes.

22 Q SEARAC would get money from the  
23 government?

24 A For SEARAC from the government.

25 Q When you submitted these applications,

1 were they -- is it correct to use the phrase a  
2 "grant application"?

3 A Grant, for grant.

4 Q Is that correct?

5 A Yes, that's a government grant, yeah.

6 Q And did you have as -- again, I'm trying  
7 to get through what your job duties were, so was  
8 one of your job duties the preparation of grant  
9 applications?

10 A Yeah. Sometime the idea come from the  
11 staff, sometimes come from me, sometime from  
12 friends from outside.

13 Q Let me rephrase the question then.  
14 Because like when you were editor of The Bridge --

15 A Yeah.

16 Q -- other people would write things, but  
17 you'd review it before it went out; right?

18 A Uh-huh.

19 Q And on these grant applications, other  
20 people would have ideas, but ultimately you were  
21 responsible for the grant applications; is that  
22 correct?

23 A Yeah, I write with them. We can divide  
24 the work.

25 Q Okay. But ultimately you were the one --

1           A        I should be.  In general I supervise  
2 everything.

3           Q        Okay.  So no grant application went out  
4 without your approval; is that correct?

5           A        Uh-huh, yeah.

6           Q        And did you sign the grant applications?

7           A        Yes, I always sign it.

8           Q        Were those signatures -- do you know what  
9 a penalty of perjury is?

10          A        I always sign as executive director or  
11 president.

12          Q        Okay.  And did you --

13          A        Initially executive director, but later  
14 on some board members suggest that you use the  
15 word "president" so that you can talk to other  
16 governments, too, okay?  You are in better  
17 position.

18          Q        Did you understand when you were  
19 submitting those grant applications that they had  
20 to be accurate?

21          A        Yes, I know.

22          Q        You could not make a misrepresentation on  
23 a grant application --

24          A        I understand that.

25          Q        -- right?

1           A        I'm very law abiding person.

2           Q        And if you didn't --

3                   MR. HART:   Hold on.   You've got to slow  
4   down your answer a little bit because you're  
5   starting to answer before he finishes, so just let  
6   him finish and then answer.

7                   THE WITNESS:   Yeah.

8   BY MR. VOSS:

9           Q        So as a law abiding citizen, you  
10   understood that you had to have truthful  
11   information on the grant applications; right?

12          A        Yes.

13          Q        Because otherwise it would not be lawful;  
14   right?

15          A        I don't...

16          Q        You said you're a lawful citizen, so it  
17   had to be truthful?

18          A        Yes.

19          Q        Because if it wasn't truthful, that  
20   wouldn't be lawful in your mind; right?

21          A        Definitely.   Can't be unlawful.

22          Q        Can't be unlawful, and if it was  
23   inaccurate or misrepresented facts, that would be  
24   unlawful; right?

25          A        Yeah.



1 Q Were you the signator, the person who  
2 signed, the grant applications? You say they  
3 started in 1982?

4 A Uh-huh.

5 Q Did you sign the grant applications from  
6 1982 until you retired?

7 A Yes.

8 Q And that was your responsibility as part  
9 of your job as the deputy director?

10 A Yes.

11 Q At some point did you become the  
12 executive director, or were you always the deputy  
13 director?

14 A I became executive in '82.

15 Q Okay.

16 A In '81 is deputy. I was deputy in '81.

17 Q So from '82 until your retirement in  
18 1997, you were the executive director?

19 A Yes.

20 Q And that was the top position at SEARAC;  
21 correct?

22 A Yeah, that's the staff -- the head of the  
23 staff.

24 Q And as the executive director was it your  
25 understanding that you had ultimate responsibility

1 for the actions of SEARAC?

2 A Yes.

3 Q Let me switch up a little bit here. You  
4 mentioned your academia briefly. I'll call it  
5 academia, being involved in teaching at Johns  
6 Hopkins. A very fine institution; correct?

7 A Yeah.

8 Q Prior to your teaching at Johns Hopkins,  
9 had you studied in any foreign country?

10 A What's the question again?

11 Q I guess I'll just be more direct. I just  
12 didn't want to lead you on to this. I'm sure your  
13 attorney would prefer I not do it to some extent.  
14 Did you study at the Sorbonne in Paris?

15 A Yes.

16 MR. HART: That didn't bother me at all.

17 THE WITNESS: For different things.

18 MR. HART: There's no jury here.

19 MR. VOSS: You know what it's like with  
20 some attorneys when you're taking depos; right?

21 MR. HART: Obviously you've forgotten how  
22 it is to take one with me.

23 BY MR. VOSS:

24 Q So you studied at the Sorbonne. What  
25 were you studying?

1           A       That's, yeah, something not related to  
2 refugees.

3           Q       No, I just wanted to know what you were  
4 studying, what subject?

5           A       Philosophy, philosophy, and especially  
6 oriental philosophy, and to be specific -- this is  
7 very incredible -- I studied Indian philosophy.

8           Q       You used a phrase I have not heard in a  
9 number of years there, "oriental" --

10          A       Yeah, oriental.

11          Q       -- which is no longer politically correct  
12 I guess would be the way to put it. When you say  
13 "oriental philosophy," what do you mean by that?

14          A       Because in Vietnamese I was secretary  
15 general of the Vietnamese -- I'm sorry, let me  
16 show it.

17          Q       Go ahead.

18          A       The publication. We have a monthly  
19 publication. This is in Vietnamese called Van  
20 Hoa. I'll say what that means, Asian culture,  
21 Asian culture, and we have quarterly in English.

22          Q       May I ask you're saying "we" have a  
23 publication. Who is "we"? Who is "we" that had  
24 the publication?

25          A       I'm sorry?

1 Q You said, "We had a publication." Who is  
2 "we"?

3 A That's good. We have a group that formed  
4 the association, and I was the secretary general,  
5 and the president is my former teacher, former  
6 professor. That group, we work on ideology  
7 against the communism.

8 MR. HART: Ideology against the  
9 communism?

10 THE WITNESS: Right, because they say in  
11 the Western culture they have their own way to  
12 fight communism, but the Asian way should be we  
13 should work on that, our Asian way.

14 BY MR. VOSS:

15 Q And is this what led you then to decide  
16 to study Indian philosophy at the Sorbonne in  
17 Paris?

18 A Right. And we need to find something  
19 from the national culture to find a way as a part  
20 of the Asian culture. That's why we came to meet  
21 with conferences in, let's say, in the U.S. at the  
22 time they have the East-West Center in Hawaii,  
23 okay, and they organize conference. We attend it,  
24 and then we continue to do that.

25 And then so when India, for example, they

1 have some kind of conference on Asian culture, we  
2 also participate, and we have these  
3 organizations -- sometime invite them to come and  
4 talk with us to find a way, the factors, that we  
5 can build up some kind of ideology that is very  
6 different because we see that communism is not for  
7 the Asian people.

8 Q Why study at the Sorbonne, why there?

9 A Yeah, because the French, they are very  
10 good at -- I have French teacher who teach me  
11 Asian culture. He even teaches Vietnamese  
12 culture.

13 Q All right. And so you chose to go to the  
14 University of Paris at the Sorbonne?

15 A Yeah.

16 Q Correct?

17 A Yeah.

18 Q And while you were there --

19 A Actually my thesis is on Buddhism.

20 Q Your thesis is on Buddhism?

21 A Buddhism, but in a specific school of  
22 Buddhism, what you may know better about the term  
23 Zen. Zen, that's Japan, but in Vietnamese we call  
24 Tien. It came from Chinese Chan, and the Japanese  
25 is Zen. Vietnam, Tien.

1           And so I taught Tien at the university,  
2   but I need to find the origin of Tien. It's not  
3   in Japan. It's not in China. It should be India.  
4   That's why I went to India to do research, too.

5           Q       So you wrote a thesis on Zen Buddhism;  
6   is that correct?

7           A       Yeah, Zen Buddhism, and my thesis is on  
8   Tien in Vietnam, but it's a kind of Zen school in  
9   Vietnam.

10          Q       And you completed this thesis?

11          A       Yeah, almost, but I didn't have the  
12   chance.

13          Q       What do you mean?

14          A       Because of the war of '65.

15          Q       What year or years were you studying in  
16   the Sorbonne?

17          A       I have my thesis in 1960 -- I mean,  
18   register, formally registered the subject of my  
19   thesis in Zen Buddhism, Zen Buddhism in Vietnam.

20          Q       So when you studied at the University of  
21   Paris at the Sorbonne --

22          A       Yes.

23          Q       Is that how you properly phrase it,  
24   University of Paris in Sorbonne?

25          A       Yeah. And then so professor at Sorbonne,

1 he said, "Okay, you want to study the origin of  
2 your Zen, of the Vietnamese Zen, so that means you  
3 need to study Indian philosophy."

4 Q Why a thesis, is that part of getting  
5 your doctorate degree?

6 A So with that thesis, when I write the  
7 outline and submit it, and then when the professor  
8 accept it, and the board of the school, they  
9 accept it, and so I can register officially, and  
10 when I registered the topic, the subject, it has  
11 the validity for ten years. You have ten years to  
12 write that, and then even after ten years, if you  
13 can't finish it, you can continue, but you need to  
14 submit a renew, renewal, okay?

15 But naturally, I can't finish that within  
16 five years or so. Why that long? Because I have  
17 to come back. I didn't stay in France. I stayed  
18 for just one year to take the basic courses, and  
19 then to get my subject accepted and formally  
20 register for ten years, and I came back to  
21 Vietnam. Why? Because the materials should be in  
22 Vietnam, not in France.

23 Q Okay.

24 A They are all in Chinese characters.  
25 That's why I have to come back to Vietnam.

1 Q And then -- -

2 A And the second reason --

3 Q Let me ask just to clarify, so you went  
4 back to Vietnam to work on your thesis because  
5 that's where the source material was?

6 A Yes, that's the source material.

7 Q Okay. Do you have a copy of your thesis?

8 A Uh-huh.

9 Q Do you have a copy of your thesis, a  
10 printed copy?

11 A Yeah, I could not take it out. I put it  
12 in my briefcase. That's the story.

13 Q Do you have it in your briefcase?

14 A No, not in here. When I left the country  
15 in '75, the last day of '75, so the American  
16 friends took me out. I was -- then I have a  
17 position then with the Americans. I was director  
18 of the VAA Press. What VAA stand for? It's  
19 Vietnamese American Association, so that's the  
20 friendly association.

21 MR. HART: So tell us what happened to  
22 your copy of the thesis.

23 THE WITNESS: Okay. So then I put  
24 everything very preciously academic in my  
25 briefcase, the Samsonite thing. I put in there,



1 and I was told that each family, each person can  
2 have two luggage, so I told my wife, "Okay, do the  
3 bigger one. I take care of myself and my  
4 materials." So the thesis halfway, almost  
5 finished, not yet finished, you see, because I  
6 need to go to France to submit formally so I can  
7 get the title, right, but when I still working on  
8 that, so I was not a doctor yet.

9 MR. HART: So what happened to the  
10 thesis?

11 THE WITNESS: Huh?

12 MR. HART: Was the thesis in a bag that  
13 didn't get put on the plane?

14 THE WITNESS: Yeah, I put it in the bag  
15 and to take it out with me, but before boarding,  
16 there was an instruction that everyone could only  
17 carry one luggage, not two.

18 BY MR. VOSS:

19 Q So your wife's luggage was more important  
20 than yours?

21 A Well, in this case the luggage should be  
22 with us, and so I have to leave my briefcase at  
23 the airport.

24 MR. HART: We understand.

25 THE WITNESS: That's why it was stolen

1 somewhere. I think I can find that story.

2 BY MR. VOSS:

3 Q Did you ever go back to the Sorbonne?

4 A No.

5 Q Did you ever contact your mentor at the  
6 Sorbonne after your thesis was lost?

7 A I came back just to visit, not to study  
8 anymore because when I was -- when I came back, so  
9 that means I came to France in 1960 and stayed for  
10 one year, came back to Vietnam in '61, and in  
11 Vietnam in '61, then my boss at the Ministry of  
12 Education, they say that since you are preparing  
13 your thesis, I think the better job for you is not  
14 to go back to the old office to write a textbook  
15 for high school children, okay? I think that I  
16 want to appoint you to the position as an  
17 instructor, okay, at the School of Letters (sic)  
18 and Human Science, okay, where you can have better  
19 chance to research your material for your thesis.

20 Q And this is at the Sorbonne?

21 A Yeah -- no, that's in the --

22 Q Johns Hopkins?

23 A In Saigon.

24 Q Oh, in Saigon, okay.

25 A Yes, because I was appointed by the

1 Vietnamese government. Yeah, I was a Vietnamese  
2 government officer. I mean...

3 Q How did you come to be a professor at  
4 Johns Hopkins?

5 A Okay. So that's a long story, but I try  
6 to make it very short.

7 MR. HART: Hold on just a second.

8 THE WITNESS: Very short.

9 MR. HART: Is that correct, were you a  
10 professor at Johns Hopkins?

11 THE WITNESS: Yes. Actually the official  
12 is in paper. I have that in the certificate.

13 BY MR. VOSS:

14 Q So how did you come to be at Johns  
15 Hopkins?

16 A Okay. I attend a conference in Warsaw.  
17 This is very -- I talk to you about policymakers.  
18 Later on the State Department and then some  
19 congressional people talk to me when at the end of  
20 1980s and early nineties, the Eastern Europe, the  
21 communist countries, okay, collapse, and even the  
22 Soviet Russia was about to collapse, then when  
23 Soviet Russia collapse in 1990, so they -- in  
24 Europe they had -- it's called CSCE. That stands  
25 for Commission For Security and Cooperation in

1 Europe, yeah.

2 MR. HART: CSCE?

3 THE WITNESS: Yeah, CSCE, Security -- for  
4 Security and Cooperation in Europe, and it's very  
5 strange thing. The U.S. is co-chair of that, so  
6 two senators -- I mean, one senator and one  
7 congressman from the U.S. Congress co-chair of the  
8 CSCE in the U.S. That's a branch.

9 BY MR. VOSS:

10 Q So how did that get you to Johns Hopkins?

11 A I think that's because the U.S. funded  
12 that.

13 Q But why Johns Hopkins, why not Stanford,  
14 why not --

15 A Okay. So this is why they introduced me  
16 to Johns Hopkins; right? I was -- because I talk  
17 to them about how to do the -- after the collapse  
18 of the Europe and then the Soviet Russia, I say  
19 this is a good opportunity for the U.S. to take  
20 over the members of the Soviet Russia, the Eastern  
21 Europe, so they should be members of NATO, and  
22 then so the U.S. would fund them, and then they  
23 can get involved in that, so they like my idea,  
24 okay?

25 So when CSCE continues its meeting in

1 Warsaw about how to deal with the situation, when  
2 the 15 countries of Soviet Russia became  
3 independent, so how to deal with the situation,  
4 and they invite me to come as a member of the U.S.  
5 delegation, and they need me to talk about --  
6 because I am very good at organizing community  
7 organizations, how to build community  
8 organizations to get involved in building the  
9 civil society.

10 So start with nonprofit organization.  
11 You are building the nonprofit organization. What  
12 you call it? NGO; right?

13 MR. HART: Hold on. Don't tell us all  
14 about that. Tell us about how the collapse of the  
15 Soviet satellite states led you to Johns Hopkins.

16 THE WITNESS: Yeah.

17 MR. HART: Give us that connection.

18 THE WITNESS: So I was -- at the point I  
19 was invited --

20 MR. HART: And point yourself towards the  
21 court reporter because that will make it easier  
22 for her to --

23 THE WITNESS: I was invited, I was asked  
24 to speak, about the topic how to build the  
25 communist organization, and so that eventually

1 they can get involved in building civilian  
2 society, so I talk about that. So that's my  
3 topic, how we can organize community organization  
4 at the conference.

5 BY MR. VOSS:

6 Q So what does that have to do with Johns  
7 Hopkins?

8 A Then -- not yet, okay? Halfway. Then  
9 the break time, coffee break, okay? When I finish  
10 it, there's a coffee break.

11 And then so the representatives from the  
12 Eastern Europe, many of them came to see me. When  
13 the American delegation was talking to each other  
14 and having coffee and they came to see -- not they  
15 came to see me, but they talk -- there was -- I  
16 remember the big woman, a woman. She's Russian.  
17 She's Russian. She came to attend the conference,  
18 too, and she came to meet with my -- the head of  
19 the delegation. That's Ambassador Zimmerman, and  
20 she came to him and she said that, "Sir, I want  
21 you to lend me this gentleman." She point at me.  
22 "I want this gentleman. I want his help."

23 And the chief of the delegation say,  
24 "Well, that's very good, but you have to ask him.  
25 In America I can't order him to help you. If you

1 want him to help you, you have to ask him, not  
2 me." So that's the first lesson of democracy.

3 MR. HART: I want to hear Johns Hopkins  
4 pretty soon.

5 BY MR. VOSS:

6 Q How did you get to John's Hopkins?

7 A She came to me and she said, "Are you  
8 coming to help us?" I said, "What for?" And she  
9 said, "To help us -- to help the refugees in  
10 Russia." I said -- and I misunderstood her. I  
11 said, "We don't have refugees, Vietnamese, in  
12 Russia." She said, "No, no, no. These are  
13 Russian refugees because we were repatriated from  
14 these 15 countries. They are now independent.  
15 They push us out."

16 Q Was this woman from Johns Hopkins?

17 A No, she was not, but then -- so when I  
18 came back -- I came back. So then Johns Hopkins  
19 learn about my story with the State Department.  
20 They communicated, agencies together. In John's  
21 Hopkins they have the School of Science -- I mean,  
22 the School of Advanced International Studies, so  
23 they learn everything about the conference in  
24 Warsaw.

25 And so they got the proceeding and they

1 talk to each other, and then so the State  
2 Department said that, "Well, thanks to Khoa," and  
3 I had the letter from the school chair of the  
4 State Department. When he came back, we had a  
5 meeting at the State Department, and they said  
6 that we have to submit a report to the president,  
7 and so they asked --

8 Q That doesn't have anything to do with  
9 Johns Hopkins; right? Basically what you're  
10 saying, if I can distill it down is --

11 A Yeah, so they learn about my --

12 Q Tell me if I'm right or wrong. You ended  
13 up at Johns Hopkins because people at Johns  
14 Hopkins saw your involvement in a conference in  
15 Europe regarding refugees?

16 A That's right. That's because of my --

17 Q Is that correct?

18 A Yeah, that's very correct.

19 MR. HART: Okay, let's take a little  
20 break because I want to tell you something. That  
21 explanation, that answer to his question, was  
22 capable of being given in ten words, okay? The  
23 rest of the story is very interesting, and  
24 sometimes we might want to know about that, but  
25 for today's purposes, give us the ten-word



1 explanation, okay, not 10 sentences worth?

2 MR. VOSS: Khoa, would you like to take a  
3 break for a few minutes?

4 MR. HART: I think that he's doing fine.

5 THE WITNESS: Can I just answer this  
6 person why I'm at Johns Hopkins? They invited me.

7 MR. VOSS: You just did. There's no  
8 question pending, okay?

9 THE WITNESS: They invited me, that's  
10 why.

11 MR. HART: We got it.

12 MR. VOSS: We've been going for just shy  
13 of an hour. Would you like to take a brief break?  
14 I would be happy to get myself a cup of coffee  
15 that didn't get yet.

16 MR. HART: Yeah, let's do it.

17 MR. VOSS: Hoyt, that would be wonderful.  
18 Thank you.

19 MR. HART: Okay.

20 (Recess taken.)

21 BY MR. VOSS:

22 Q We had this morning talked about grant  
23 applications.

24 A Yeah.

25 Q I'd like to show you a few documents.

1 I'd like to show you first a document that says on  
2 the top it's a "Technical Proposal."

3 A Yeah.

4 Q Okay. And the letterhead on the top says  
5 "Indochina Resource Action Center." Do you  
6 recognize this document? Strike that.

7 Earlier you talked about getting money  
8 relating to MAAs, Mutual Assistant Associations.  
9 Do you remember your testimony about that earlier  
10 this morning, yes, no? Khoa, Khoa?

11 A I'm sorry?

12 Q Did you this morning -- and the record  
13 should reflect he couldn't hear me earlier.

14 So I'm just asking again do you recognize  
15 this morning you talked about the Mutual  
16 Assistance Associations, MAAs?

17 A Yes.

18 Q And I see that referenced on the front  
19 page of this document. Do you see that there?

20 A Yeah.

21 Q Is this the type of document we were  
22 talking about earlier where you would ask the  
23 government for grant money?

24 A Uh-huh.

25 Q Is this one of those documents?

1 A Yes.

2 Q Okay. As part of this document there is  
3 on the back of the document on the last three  
4 pages entitled Appendix --

5 A Yeah.

6 Q -- Appendix C.1. Do you see that there,  
7 and it has "Khoa," and I don't know how to  
8 pronounce X-u-a-n. How do I pronounce your middle  
9 name?

10 MR. HART: "Xuan."

11 BY MR. VOSS:

12 Q Is it Khoa Xuan Le?

13 A Khoa?

14 Q How do you pronounce that?

15 MR. ERIGERO: X-u-a-n.

16 THE WITNESS: "Xuan."

17 BY MR. VOSS:

18 Q "Xuan," okay.

19 A Yeah.

20 Q Khoa Xuan Le?

21 A "Le." Not Lee. "Le."

22 Q "Le," okay. Khoa Xuan Le, and if I say  
23 it wrong, please feel free to correct me. I don't  
24 mean any insult.

25 A No, I'm very pleased to be asked.

1 Q I try.

2 And this document, is this your what I  
3 would call a resume, would you agree?

4 A Right, yeah, I understand it.

5 Q Did you attach this resume -- or strike  
6 that.

7 Why is your resume attached to this  
8 application for money from the government?

9 A I think that's a kind of procedure that  
10 you need to have.

11 MR. HART: Okay, hold on. Hold on before  
12 you answer. I need to object because we haven't  
13 established that this particular document -- and  
14 will we mark this as an exhibit?

15 MR. VOSS: We can mark it as Exhibit 1.

16 MR. HART: Okay. So this is Exhibit 1.

17 (Deposition Exhibit 1 was marked for  
18 identification by the court reporter.)

19 BY MR. VOSS:

20 Q Is Exhibit 1 a document requesting money  
21 from the government?

22 THE WITNESS: Yeah.

23 MR. HART: It is?

24 MR. VOSS: Yes. I asked him whether this  
25 was a grant application. He said, "Yes."

1 MR. HART: Okay.

2 THE WITNESS: This is a funding proposal;  
3 right?

4 MR. VOSS: Yes.

5 MR. HART: So the question then is why is  
6 your resume attached?

7 MR. VOSS: He's answered that.

8 THE WITNESS: I think that's the kind of  
9 procedure that you need when you apply for a  
10 proposal for grant. You need to introduce  
11 yourself.

12 MR. HART: Okay.

13 BY MR. VOSS:

14 Q Okay. And on this document on page 3,  
15 under your "Education" --

16 A Yeah.

17 Q You see that? There's a reference to  
18 your doctoral thesis entitled "The Philosophy of  
19 Dhyana Zen Buddhism in Vietnam."

20 A Yeah, right.

21 Q Is that the doctoral thesis that we were  
22 discussing earlier?

23 A Where is that?

24 Q Page 3 under "Education."

25 A Page 2 -- oh, page 3, yeah.

1 Q Is that the thesis we were discussing  
2 earlier?

3 A Okay. Oh, here, here, doctoral thesis.

4 Q Is that the one we were talking about  
5 earlier?

6 A I see, yeah.

7 Q Yes or no, is that the doctoral thesis we  
8 discussed this morning?

9 A When I put this, that means the topic.

10 MR. HART: Okay. Khoa.

11 MR. VOSS: You need to answer the  
12 question.

13 MR. HART: Listen to what he's asking.  
14 He wants to know if this is the same thesis that  
15 we talked about earlier.

16 THE WITNESS: Yes, that's the same.

17 BY MR. VOSS:

18 Q That's all the question is.

19 A The same thesis.

20 Q Okay. Is there any reason why your  
21 resume doesn't show that the thesis was never  
22 completed?

23 A I don't know why. I think that's enough.  
24 I need just to say I am writing that thesis, and I  
25 registered the thesis, the topic, and this is the

1 reason I put it in here.

2 Q Is there anywhere on your resume that  
3 says it's been registered and you're writing it?

4 A No, but that's my understanding.

5 Q Is there anywhere for the person  
6 reviewing this document to know that the doctoral  
7 thesis that is referenced here is incomplete?

8 A No. Well, I think that because of the  
9 resume, you don't have to explain too long and  
10 just put that, okay. Education, you have the  
11 thesis. That's the topic of the thesis, so then I  
12 put it in there.

13 Q So somebody reading this could presume  
14 that you did a doctoral thesis; right? Isn't it  
15 correct to say that someone reading this resume as  
16 written would be led to believe that there was a  
17 doctoral thesis?

18 A Yeah, that depends on the understanding  
19 of each person. There might be --

20 Q There's nothing in here to --

21 A There might be --

22 Q Listen to the question. There's nothing  
23 in here to tell somebody that it's not completed,  
24 is there?

25 MR. HART: Objection, argumentative. The

1 document speaks for itself. Do you understand his  
2 question?

3 THE WITNESS: Yeah.

4 MR. HART: Okay. Do you agree with what  
5 he said?

6 THE WITNESS: I say that depends on the  
7 understanding of people.

8 BY MR. VOSS:

9 Q How would the reader have an  
10 understanding that it wasn't completed?

11 A My understanding is that this is just the  
12 thesis that I was working on. I was working on.

13 Q And is there somewhere in this document  
14 where it indicates you're just working on it?

15 A I think that I just understand it that  
16 way.

17 Q You understood it that way, but that's  
18 not what it said, is it?

19 MR. HART: Objection, argumentative.  
20 It's exactly what it says.

21 MR. VOSS: That it's not completed?

22 MR. HART: That's what a thesis says. If  
23 you're completed, you say I'm a Ph.D. or I'm a  
24 doctoral candidate.

25 MR. VOSS: Counsel is testifying. Move



1 to strike.

2 That's marked as Exhibit 1, so this will  
3 be No. 2. I'm next going to introduce as Exhibit  
4 No. 2 another technical proposal. This is dated  
5 May of 1985.

6 (Deposition Exhibit 2 was marked for  
7 identification by the court reporter.)

8 BY MR. VOSS:

9 Q Is this another grant application?

10 A Yeah, another application.

11 Q And that's your signature on the  
12 document; right? That's your signature?

13 A Yes, that's my signature as president,  
14 not as a doctor.

15 Q And you earlier mentioned you became the  
16 executive director. Why are you signing as  
17 president?

18 A Well, because my board meeting -- at the  
19 board meeting, they don't say about president to  
20 get the grant, but they say you are working with  
21 international people. You need to be respectable,  
22 so president of an organization sounds more  
23 respectable than just executive director, so then  
24 they elevated me. They promoted me to the  
25 presidentship.

1 Q Okay. And then this is not the entire  
2 application; right? If you look here, the next  
3 page is page 61, so this is just part of the  
4 application; correct?

5 A Yeah.

6 MR. HART: Is there some reason we don't  
7 have the rest of it?

8 MR. VOSS: None of it was relevant in our  
9 estimation. You're welcome to...

10 MR. HART: No, that's fine. Less is  
11 better.

12 MR. VOSS: Right. Well, you saw that  
13 other one. That's what a full one looks like.

14 MR. HART: As long as the record is clear  
15 that it's an incomplete copy.

16 MR. VOSS: Well, it goes from cover sheet  
17 to 61, so...

18 MR. HART: Okay.

19 BY MR. VOSS:

20 Q And when you're talking about being  
21 respectable, it's important in the application  
22 that they see you as a respectable entity; right?

23 A Yeah, as represented.

24 Q And so here on page 61 it starts -- this  
25 is Section VII of the document regarding "Staff

1 Experience and Capability"; right, the second  
2 page?

3 A Yeah.

4 Q He's already passed it. Back one page.  
5 Back one page. There you go. It's stuck  
6 together.

7 MR. HART: He wants to talk about things  
8 that are on this page right here, 61.

9 THE WITNESS: Oh, 61.

10 BY MR. VOSS:

11 Q 61.

12 A I see this.

13 Q This is "Staff Experience and  
14 Capability," that's this section; right?

15 A "Staff Experience," okay.

16 Q Is it fair to say the purpose of this  
17 section is to amplify what you just said, that you  
18 had -- you were impressing them; correct?

19 A Right, maybe.

20 Q You were at least trying to impress them  
21 with your capabilities and so on just like being  
22 president; right?

23 A I'm not saying anything. I just think  
24 that because people say that you have to show that  
25 you have capability.

1 Q And that was the purpose of this  
2 description of yourself is to show you had the  
3 capability; right?

4 A Yeah.

5 Q And then likewise again your resume is  
6 attached, and is the reason your resume is  
7 attached again to show your capability and to  
8 impress upon them --

9 A And that's a part of the procedure, the  
10 formality, the condition that you have to  
11 introduce yourself, why you do the project and  
12 then who you are.

13 Q Okay. And again, and we've already asked  
14 questions about it, but there is reference to your  
15 doctoral thesis in your resume; right?

16 A Yeah.

17 Q Same exact one as the last one; right?

18 A Yeah.

19 Q As Exhibit 1, this is the same thesis  
20 that was referred to in Exhibit 1?

21 A Okay, same thing. Not thesis. That's  
22 why I want to clarify.

23 Q That's no question pending, sir.

24 A Yeah.

25 MR. HART: Just wait. He'll ask another

1 question in a minute.

2 MR. VOSS: I just want to get through  
3 these documents, okay? So let's mark that  
4 document as Exhibit 2.

5 Next I'm going to show you a document  
6 we're going to mark as Exhibit 3.

7 (Deposition Exhibit 3 was marked for  
8 identification by the court reporter.)

9 BY MR. VOSS:

10 Q Do you recognize this document?

11 A Yes.

12 Q Okay. We've now seen -- and is it  
13 correct to say this is also yet another grant  
14 application?

15 A Yeah, that's very familiar to me.

16 Q Okay. And again, attached to the back  
17 of this document is your resume; correct? It's  
18 page 3 of the appendix at the end.

19 A Yeah, resume.

20 Q It's in the appendix for resumes that far  
21 back, Hoyt, if you want to help him.

22 MR. HART: Yeah, I got it.

23 THE WITNESS: Oh, here, okay. Same  
24 thing.

25 BY MR. VOSS:

1 Q Yeah. So is it fair to say that in doing  
2 grant applications you attached this same resume  
3 every time?

4 A Yeah. So this is a kind of assembled and  
5 always the same model to use that.

6 Q Okay. So again, yes or no, this is the  
7 resume you used on each of these grant  
8 applications you made to the government for money  
9 for SEARAC; correct?

10 A That's correct. That's correct.

11 Q And let's mark that as Exhibit 3.

12 Do you know if you were asked to produce  
13 grant applications in your possession as a  
14 document request?

15 A Again?

16 Q Do you know if you were asked to produce  
17 grant applications as discovery requests to you?  
18 Do you know if you were asked to give us copies of  
19 those?

20 A Uh-huh.

21 Q Yes?

22 A Yes.

23 Q Okay. And is it fair to say that you  
24 only produced one partial grant application?

25 MR. HART: Do you remember?

1 THE WITNESS: I did not write a whole  
2 application, so I wrote only part of it.

3 MR. VOSS: Move to strike as  
4 nonresponsive.

5 Q In giving your lawyer documents to  
6 provide to us in response to our request, a  
7 document was given to us that was dated August of  
8 1996, and this is a proposal submitted to the  
9 Department of State, and that's correct?

10 A And this is the Department of State,  
11 okay.

12 Q And you remember seeing this document and  
13 that you gave this -- through your attorney, you  
14 provided this to us recently; right?

15 A Yes.

16 Q Is there any reason that you didn't  
17 provide any other grant application other than  
18 this partial one?

19 A Well, before I moved to California, okay,  
20 and the retirement, I'm sorry, and take home some  
21 things for my book later, so I have my own  
22 archive. I don't want to take too many things,  
23 and for the training purposes because I know that  
24 I will continue to advise, to teach, to train the  
25 people from community, and so I need just the

1 narrative part of the grant. We don't need  
2 anything else.

3 Q Why did you only produce through page 23?

4 A Well, so then this is the whole -- I need  
5 just this.

6 MR. HART: The answer is that's all he  
7 had.

8 THE WITNESS: Yeah, the narrative of the  
9 project.

10 MR. HART: What he's telling you is he  
11 did not save the whole thing.

12 THE WITNESS: What I need, what I need to  
13 teach people how to write a proposal.

14 BY MR. VOSS:

15 Q But you just said procedurally you needed  
16 to include the resume; right?

17 A Yes.

18 Q So when you were teaching how to write a  
19 proposal, didn't you need to show them you had to  
20 include the resume as part of the process?

21 A Okay. I don't teach them how to write a  
22 resume. I just say you need to introduce the  
23 staff.

24 Q So then why didn't you include the  
25 portion where you introduced the staff in this



1 23 pages you produced?

2 MR. HART: Assuming there's a particular  
3 reason.

4 THE WITNESS: Okay. This one, this is  
5 the last proposal. I remember now. This is the  
6 last proposal we submit to the State Department.

7 BY MR. VOSS:

8 Q Uh-huh.

9 A And so because it's the last one, we  
10 found that we don't need to attach resume anymore  
11 because they know everything already, so just  
12 submit.

13 Q So this partial document is from August  
14 of 1996. Do you recollect a congressperson  
15 criticizing your credentials in doing grant  
16 applications? Did any congressman criticize you?

17 A Maybe Mr. Dornan. I have to check  
18 whether I understand the right one. I think one  
19 man.

20 Q What was the one man?

21 A Congressman Dornan, D-o-r-n-a-n, Dornan,  
22 Robert Dornan.

23 Q So is it fair to say that Congressman  
24 Dornan criticized your self-promotion as a Ph.D.?

25 A I don't know why.

1           Q       Do you know if he criticized you for  
2   that?

3           MR. HART:   Hold on a second.

4           MR. VOSS:   I'm not asking why.

5           MR. HART:   Okay.  I'm going to object  
6   that your question has assumed facts that haven't  
7   been established in this depo yet.  Did you ever  
8   self-promote yourself as a Ph.D.?

9           THE WITNESS:  No, I don't.

10          MR. HART:   Did somebody criticize you for  
11   doing that?

12          MR. VOSS:   Counsel, you get to do  
13   redirect.  This is inappropriate questioning.

14          THE WITNESS:  He criticize me.  He was  
15   wrong.

16          MR. VOSS:   Move to strike.

17          THE WITNESS:  I did not promote myself.

18          MR. VOSS:   Counsel, there is no question.  
19   I have no question pending.

20          MR. HART:   That's fine.  Wait for the  
21   next question.

22          MR. VOSS:   Exhibit 4?

23          THE REPORTER:  Yes.

24                        (Deposition Exhibit 4 was marked for  
25   identification by the court reporter.)

1 BY MR. VOSS:

2 Q You referenced criticism by Congressman  
3 Dornan. I want to show you first a letter on  
4 stationery for Congressman Dornan dated April 2 of  
5 1996.

6 I want to make sure which ones you all  
7 have. Do those have highlighting on them, because  
8 we don't want to use that as an exhibit if it  
9 does?

10 MR. HART: No, neither of them do.

11 BY MR. VOSS:

12 Q Have you seen this letter before, sir?

13 A Huh?

14 Q Have you seen this letter before?

15 A Yes.

16 Q Okay. And is this when you were  
17 referring to Congressman Dornan criticizing, is  
18 this at least in part what you're referring to  
19 when he was criticizing?

20 A Well, he wrote to us, too.

21 Q Okay. And did he criticize your --  
22 strike that. There's no question pending.

23 A This is very wrong.

24 MR. HART: Okay. Just wait.

25 BY MR. VOSS:

1 Q Did you understand that by this letter  
2 Congressman Dornan was criticizing SEARAC?

3 A So he criticized me and SEARAC.

4 Q Yes or no, sir? Was he criticizing  
5 SEARAC, yes or no?

6 A What's that?

7 MR. HART: Hold on just a second. He's  
8 asking if this letter, which for the record speaks  
9 for itself, is seen by you as being critical of  
10 SEARAC?

11 THE WITNESS: Yes.

12 BY MR. VOSS:

13 Q You earlier testified a few moments ago  
14 that Congressman Dornan criticized you; correct?

15 A Yes.

16 Q And this letter is one of the ways in  
17 which he criticized; isn't that correct?

18 A Yes.

19 Q Okay. In this letter in the second  
20 paragraph, Congressman Dornan wrote, and I'm  
21 quoting the letter if you look in that second  
22 paragraph --

23 A Yeah.

24 Q -- and I quote, "In addition, we have  
25 learned that IRAC/SEARAC has misrepresented

1 Le Xuan Khoa as a 'Doctor'." Do you see that  
2 there?

3 A Yeah, I see this.

4 Q Okay. And then he writes, "Recently, in  
5 the face of public inquiry, Mr. Khoa admitted he  
6 is not a doctor." Do you see that there?

7 A Yeah, I see that.

8 Q Okay. Did you publicly state in or  
9 around April of 1996 that you were not a doctor,  
10 did you say that?

11 A I see this, but I never admit it.

12 Q So you --

13 A I don't know why he put it in here. I  
14 disagree.

15 Q So is it your belief that you never  
16 admitted that you were not a doctor?

17 A I never said that.

18 Q So you always --

19 A Where is the proof, where is the  
20 evidence?

21 Q Okay. I ask questions.

22 A I'm sorry.

23 Q You give answers.

24 A I want to ask Dornan. I know him so  
25 well. He was on my advisory board.

1 Q Okay. Move to strike, nonresponsive. No  
2 question pending.

3 When Congressman Dornan says, "We have  
4 learned that IRAC/SEARAC has misrepresented  
5 Le Xuan Khoa as a 'Doctor'," do you have any idea  
6 where that came from?

7 A No.

8 Q You indicated that there was other  
9 correspondence sent by Dornan to you; is that  
10 correct?

11 A I don't know why Congressman -- yeah,  
12 said in here like that.

13 Q You said earlier that there was other  
14 correspondence sent by Dornan to you; is that  
15 correct?

16 A Yeah, there is, but he didn't say that in  
17 the correspondence that I admitted that I was not  
18 a doctor.

19 Q Please listen to the question, sir.

20 A Uh-huh.

21 Q So the simple question I have is, is it  
22 correct that Dornan, the congressman, sent other  
23 correspondence, not this letter, other  
24 correspondence to you?

25 A Yes.

1 Q And that they were asking questions of  
2 you in that correspondence; correct?

3 A Uh-huh, yes.

4 Q And in and amongst those questions were  
5 you asked to provide information about your  
6 educational background?

7 A Uh-huh, okay.

8 Q Were you asked that question in that  
9 correspondence?

10 MR. HART: Let's just hold on a second  
11 because it might take him a minute to think about  
12 the answer, so stacking these questions one on top  
13 of the other, I don't even hardly have time to  
14 breathe or look at this document. I want you to  
15 slow down so he can think.

16 MR. VOSS: I understand why you're  
17 getting excited suddenly here.

18 MR. HART: Yeah, you're pissing me off.  
19 That's why I'm getting excited.

20 MR. VOSS: Now we're just getting to the  
21 truth, Counsel.

22 THE WITNESS: I don't have the letter  
23 here, but I remember. I remember that.

24 BY MR. VOSS:

25 Q That he asked you?

1           A       He asked me to provide something like an  
2   OR.   That means submit your grant, submit  
3   everything, and then they all did get submitted.  
4   I don't know whether -- I don't know exactly what  
5   I gave to him, but after that, nothing happened.  
6   I just even asked so what's the result of your  
7   investigation?

8           Q       Move to strike.   Again, you need to  
9   listen to my questions, sir.   I didn't ask you  
10   about what happened later.

11           MR. HART:   I think he's answered your  
12   question, David.

13           MR. VOSS:   No, I'm going to ask it again  
14   so the record is clear, not wandering off to what  
15   you want to testify to.

16           MR. HART:   Listen carefully to the  
17   question.

18   BY MR. VOSS:

19           Q       Did the letter from Dornan to you ask you  
20   to provide additional information?

21           A       Yeah.

22           Q       And was that additional information  
23   related to your educational experience?

24           A       No about doctor.

25           Q       What specifically do you recollect



1 this --

2 A The materials about the grant writing and  
3 the report on the grant implementation, things  
4 like that.

5 Q Okay.

6 A But he didn't ask me whether I was a  
7 doctor or not.

8 Q Okay. I'd like to mark this as  
9 Exhibit 4.

10 A Because if he did ask, then I should have  
11 answered.

12 Q There's no question pending. Again, you  
13 need to -- so would you please hand that to the  
14 court reporter?

15 I'm next marking as No. 5 a letter from  
16 Congressman Dornan dated April 30th, 1996.

17 (Deposition Exhibit 5 was marked for  
18 identification by the court reporter.)

19 BY MR. VOSS:

20 Q There's a highlighted part down on the  
21 bottom. Do you see the orange mark there? Now  
22 I'll represent to you that orange mark is not part  
23 of the original document. That was added by us so  
24 you could see where to look, okay?

25 A Okay.

1           Q       And down on No. 5 it says that  
2       Congressman Dornan writes, quote, "Mr. Khoa's  
3       self-promotion as a 'Ph.D.' However, he recently  
4       admitted he does not have such a degree. His  
5       misrepresentation of academic credentials may have  
6       resulted in his receiving State Department grants  
7       over competing applicants." Do you see that  
8       there?

9           A       Yeah, I see that clearly.

10          Q       And do you recognize having seen this  
11       letter before?

12          A       I see that before.

13          Q       Okay. And do you know if -- have you at  
14       any time admitted that you did not have a Ph.D.?

15          A       No.

16          Q       Had you admitted at any time that you  
17       were not a doctor?

18          A       No, I never admit anything.

19          Q       Okay.

20                   MR. HART: "He recently admitted that  
21       he" --

22                   THE WITNESS: No, that's why I said I did  
23       not admit anything.

24       BY MR. VOSS:

25          Q       Okay. So this is written by United

1 States Congressman Robert Dornan, and he makes  
2 this statement here that you've seen before. Do  
3 you think he was lying?

4 A I don't know whether he lied.

5 MR. HART: Calls for speculation.

6 THE WITNESS: Just speculation, yes, and  
7 just from other people, and I remember well that,  
8 yeah, there are people that came to him and said,  
9 "If this man -- deny this man, you will get  
10 reelected," but he failed that election. I don't  
11 know, but those are who were against me. This  
12 information from those who were against me, those  
13 are lying, anti-government who thought that I was  
14 pro communist, and they report to him, okay, don't  
15 play with Khoa, okay, don't play with him.

16 BY MR. VOSS:

17 Q Okay. So do you believe that this was  
18 information provided by others to Congressman  
19 Dornan?

20 A I believe so.

21 Q Okay. I'll mark as it Exhibit 5.

22 After these letters were written by  
23 Congressman Dornan, did you stop using your resume  
24 in grant applications?

25 A I don't think so. First of all, after

1 this I don't think --

2 Q Okay. Earlier we referred to the August  
3 1996 partial document that you submitted, and I  
4 asked you about whether or not your resume was  
5 attached.

6 MR. HART: We don't have a copy of that  
7 one in the record?

8 MR. VOSS: No, because you just produced  
9 it to us like days ago.

10 MR. HART: A week ago, yeah.

11 BY MR. VOSS:

12 Q You had indicated -- and I want to make  
13 sure I understand this correctly. Is it correct  
14 to say that it is your belief that your resume was  
15 no longer necessary because they had seen it  
16 before?

17 A Yeah.

18 Q So in August of 1996, is it fair to say  
19 that from that point forward that any grant  
20 application no longer included your resume?

21 A No, I think so. I think just about a  
22 couple initial proposals, but after that, then  
23 this is kind of a renewal routine.

24 MR. HART: I think the one you're  
25 referring to he has said was the last one.

1 MR. VOSS: I believe that's correct.

2 MR. HART: So there weren't any after  
3 that.

4 BY MR. VOSS:

5 Q Were there any grant applications of  
6 which you're aware between April 30, 1996 and  
7 August 1996?

8 A I think that there is some local. For  
9 example, when I work in Vietnam, that means  
10 maybe -- well, between '86 and '87, I still -- I  
11 finish in 1997, okay, and so in between that there  
12 might be some proposals. I remember -- well, this  
13 is very specific -- the Anti-Malaria Project, so I  
14 did ask for private foundation, not the government  
15 to fund it.

16 Q So so far as you know, after Congressman  
17 Dornan criticized you, and specifically relating  
18 to holding yourself out as a Ph.D. --

19 A Uh-huh.

20 Q -- from that point forward there was only  
21 one more grant application to the government, and  
22 it did not include your resume; is that accurate?

23 A No more government proposal.

24 Q All right. Let me ask you something  
25 else. Do you believe that as a result of the

1 statements made on Machsong Media that you're  
2 suing about, that your esteem in the community was  
3 impacted?

4 A I see. Yes, because if you keep talking  
5 bad about people, the first time maybe they don't  
6 pay attention, but if it's repeated like Thang did  
7 it repeatedly several times, so people should have  
8 some kind of question.

9 Q Now there have been many, many years  
10 where there was no discussion about the subject  
11 matter of ROVR until you brought it up for the  
12 anniversary of the Vietnam; right?

13 A Yeah.

14 Q Okay. And then you're the one that wrote  
15 the first article addressing ROVR after many years  
16 of no activity published; isn't that correct?

17 A Okay, what?

18 Q Let me ask it again. I'll rephrase it.

19 A Uh-huh.

20 Q So there was nobody talking about ROVR in  
21 their websites or articles at all for many years  
22 until you decided for the anniversary of Vietnam  
23 that you would publish an article; isn't that  
24 right?

25 A This is not the first time I wrote

1 article to commemorate the fall of Vietnam.

2 Q Right, but nobody had written anything in  
3 response to you for many years; right?

4 A I wrote it several times before on the  
5 April 30th.

6 Q Is it fair to say that nobody else raised  
7 any issue with it for many, many years?

8 A No.

9 Q Is that correct?

10 A That's correct.

11 Q So it's not until you write this article  
12 and there's a response to it --

13 A Yes.

14 Q -- that your contention is that your  
15 esteem in the community was impacted; is that  
16 right?

17 A Yeah.

18 Q So what facts do you have to show us that  
19 your esteem in the community was lowered?

20 A That's difficult to -- people just ask  
21 you questions, and then the way they ask questions  
22 like that.

23 Q So you had earlier said "repeatedly."  
24 There was only one response, right, not -- there  
25 weren't multiple responses, you're only

1 complaining about one; right?

2 A When I refer to that specific response,  
3 that's one.

4 Q Okay.

5 A And there are several others.

6 Q From many, many years ago?

7 A Yeah, many years ago.

8 Q Okay. So currently just one response?

9 A Yeah.

10 Q So your esteem in the community you  
11 believe was lowered because of this particular  
12 statement; correct?

13 A Uh-huh.

14 Q All right. You said, well, people ask  
15 you questions. What people?

16 A Well, even my relatives, my friends.  
17 Friends, relatives, and then leaders who don't  
18 know me, but they just learn about my reputation  
19 as a refugee advocate, but now when they learn  
20 things from Thang with the videotape, so they have  
21 questions. That's why they asked.

22 Q So they have questions about a videotape?

23 MR. HART: Hold on a second.

24 MR. VOSS: Counsel, if you have an  
25 objection, state your objection.



1 MR. HART: Yeah, my objection is you're  
2 talking over the top of my client's answer.

3 MR. VOSS: Well, I can see what you're  
4 trying to do.

5 MR. HART: Why don't you let him finish?

6 MR. VOSS: I did.

7 MR. HART: You're trying to manhandle the  
8 testimony. I'd like for you to wait for him to  
9 finish.

10 BY MR. VOSS:

11 Q Were you done? You had given your  
12 answer; correct? Don't look to your attorney to  
13 find the answer.

14 MR. HART: Okay. Don't instruct my  
15 client. That's really pissing me off.

16 MR. VOSS: If I ask him a question, he  
17 shouldn't be looking to you to go what do I do.

18 MR. HART: He can't hear for God's sake.

19 MR. VOSS: Suddenly he can't hear?

20 MR. HART: Is that too much for you to  
21 deal with?

22 MR. VOSS: Apparently not.

23 MR. HART: Take a second. You're so  
24 obnoxious in the way you're dealing with my client  
25 who is old and can't hear. I want you to give him

1 time to think about his answer and to complete his  
2 answer before you jump on him with a follow-up.

3 Can you do that?

4 BY MR. VOSS:

5 Q Could you hear my questions, sir?

6 A Okay. Say it again?

7 Q Were you able to hear my questions when  
8 I've been asking them to you?

9 A Okay, so then please ask.

10 Q Yes, you can hear me fine?

11 A Yes, I can hear you now.

12 Q Could you hear me all throughout this  
13 morning fine?

14 A Yeah, so far.

15 Q Okay. So who specifically can you  
16 identify whose esteem of you was lowered as a  
17 result of the statements made that you're  
18 complaining of?

19 A I can't tell you specifically whom, but  
20 the way that I got letters and phone calls and  
21 conversations or email or whatever communications,  
22 and they said that, "You need to do something  
23 because now we don't know whether he was right or  
24 not."

25 Q Have you produced any of these emails?

1           A        So that's why I say that if people are  
2 not quite believing in me anymore, that's why the  
3 esteem.

4           Q        My question is have you given us copies  
5 of the emails that you just referenced?

6           A        I don't have those anymore.

7           Q        Okay. So you don't have any emails?

8           A        It was in conversation or specific.

9           Q        Can you please answer my question, sir?  
10                    You referenced letters.

11          A        Uh-huh.

12          Q        Do you have a copy of any letters?

13          A        I do have that.

14          Q        And why haven't you produced them?

15          A        I have to look for that because when I  
16 write the answer to that person, so that's enough.  
17 That means I answer his letter, right?

18          Q        So do you have copies of letters from  
19 people that said --

20          A        It was printed on the paper, the article.  
21 I print my answer to Mr. Nguyen Quac Cuong. The  
22 name is there. I answer that letter.

23          Q        Have you provided us -- this person  
24 you're talking about, what's this person's name?

25          A        He reproduced that.

1 Q What is the name so we can be clear of  
2 the person you just referenced?

3 A Nguyen like Vietnamese Nguyen, Quac,  
4 Q-u-a-c, and Cuong, C-u-o-n-g.

5 Q Okay. Do you believe that this person is  
6 someone who had their esteem of you lowered as a  
7 result of the statement at issue? Do you think  
8 that his esteem was lowered?

9 A Yes.

10 Q Well, now you just said to us that he was  
11 saying do something. He didn't lose his faith in  
12 you, did he?

13 MR. HART: Objection, argumentative.

14 BY MR. VOSS:

15 Q You can answer. Did he lose his faith in  
16 you, or did he ask you just to respond?

17 A Well, if people ask me, I have to  
18 respond.

19 Q Okay. But you say that his esteem was  
20 lowered. How does his asking you to respond  
21 demonstrate that his esteem was lowered?

22 A If I don't respond, that means the rumor  
23 is right.

24 Q But did you respond?

25 A So that's why I have to respond. I did

1     respond.    That's why --

2           Q     So at the end of the day --

3           A     That's why my letter was printed.

4           Q     Do you know this person you're talking  
5     about?   Do you know the person that you're just  
6     describing, is he familiar to you?

7           A     I think that if I can write him back,  
8     he --

9           Q     Do you know him?

10          A     I don't know him.

11          Q     Don't know him?

12          A     I don't know him.   He just asked me  
13     question, and I think that okay, I have to  
14     respond.

15          Q     Did anybody else ask questions?

16          A     Uh-huh.

17          Q     Did anyone else ask questions?

18          A     There are people who ask me questions.

19          Q     Who?

20          A     I don't...I don't remember their name  
21     anymore.   So many.

22          Q     So many, but you can't tell us any of  
23     them?

24          A     No, I don't think that I can provide.

25          Q     So there's nobody who you can identify

1 whose esteem of you was lowered in the community;  
2 is that correct?

3 A Well, like I say, if I don't respond,  
4 that means I recognize that I was wrong.

5 Q I'm asking you if you can identify anyone  
6 other than the one person you've identified whose  
7 esteem of you was lowered as a result of the  
8 statement?

9 A No.

10 Q Just the one; is that correct?

11 A So far just that one.

12 Q I'm marking as Exhibit 6 a document that  
13 says "Appendix C.1" on the top right corner, and  
14 it's on IRAC stationery and entitled "Le Xuan  
15 Khoa's Bio Data."

16 (Deposition Exhibit 6 was marked for  
17 identification by the court reporter.)

18 BY MR. VOSS:

19 Q Do you recognize this document, sir?

20 A Yeah, but this is my staff who wrote it.

21 Q And you reviewed everything before it was  
22 sent out you said earlier; right?

23 A Huh?

24 Q Did you review this before it was used?

25 A I may, yes, seen this before.

1 Q Okay. So on this document, on the second  
2 paragraph it identifies you as Dr. Khoa. Do you  
3 see that there?

4 A Okay, I see that.

5 Q Okay. And on the last page on the last  
6 paragraph it also identifies you as Dr. Khoa;  
7 right?

8 A Right, yes.

9 Q And this is the official stationery of  
10 IRAC for whom you worked; right?

11 A Yeah. That means my staff write to give  
12 to whoever want to know about IRAC.

13 Q Okay. And it also identifies you as the  
14 chief editor of The Bridge; correct?

15 A Yeah.

16 Q So have you any reason to believe that  
17 this is a falsified document?

18 A No.

19 Q It's a true and correct document used by  
20 IRAC; right?

21 A By IRAC, yeah.

22 Q Okay. I'm marking that as Exhibit No. 6.  
23 Next I'm going to mark as Exhibit No. 7 a  
24 two-page document, the first page being -- I don't  
25 know what you would call it -- a summary of the

1 attached document, and the attached page is a --  
2 it's identified as "Summer 1995, The Bridge."

3 (Deposition Exhibit 7 was marked for  
4 identification by the court reporter.)

5 BY MR. VOSS:

6 Q Do you recognize the second page of this  
7 document, sir? Is that a true and correct copy of  
8 a page from The Bridge?

9 A Yes, this should be on The Bridge.

10 Q Okay. And you had earlier indicated as  
11 editor-in-chief you reviewed all issues of The  
12 Bridge before they were sent out; correct?

13 A What's the question again?

14 Q Strike that.

15 There's a highlighted portion on the top  
16 of this page, page 13, "Summer 1995, The Bridge."  
17 Do you see that there?

18 A Yes.

19 Q And it starts with "Overview on U.S.  
20 NGOs." Do you see that?

21 A Yes, this is written by staff.

22 Q And you reviewed it as editor-in-chief;  
23 correct?

24 A Yes.

25 Q Okay. And the reference there is to



1 Dr. Khoa; correct?

2 A But I see --

3 Q Is that correct?

4 A I accept that people called me doctor or  
5 professor indifferently. It's becomes usual  
6 already, so many times I cannot --

7 MR. HART: You don't have to explain.

8 MR. VOSS: Let him finish, Counsel.  
9 Funny how you don't want him to finish when  
10 he's...

11 THE WITNESS: This one where they get it,  
12 I don't know because this is not in The Bridge.

13 BY MR. VOSS:

14 Q I understand that.

15 A This is not in my Bridge at all.

16 Q We understand page 1 is not from The  
17 Bridge.

18 A Yeah, not from The Bridge.

19 Q I was directing your attention to page 2.

20 A Yeah.

21 MR. VOSS: And Counsel, don't be coaching  
22 him by showing him stuff.

23 MR. HART: Is this from The Bridge?

24 THE WITNESS: Yeah, that's from The  
25 Bridge.

1 MR. HART: Page 2?

2 THE WITNESS: The second page.

3 MR. VOSS: That's what I asked. He  
4 doesn't need coaching, Counsel.

5 Q So is there any reason this document  
6 references, from The Bridge, an invitation to the  
7 People's Aid Coordinating Committee and a  
8 presentation on non-governmental organizations in  
9 the U.S., do you see that?

10 MR. HART: Where is that?

11 MR. VOSS: By the highlight.

12 Q Do you see the subject in that paragraph?

13 A The proceeds?

14 Q Here where the highlight is.

15 MR. HART: Right here. What is it you're  
16 asking him about that?

17 BY MR. VOSS:

18 Q This has to do with policies relating to  
19 the refugees; right?

20 A Yeah, this PACCOM is in Vietnam.

21 Q And this is relating to policies relating  
22 to the refugees from Vietnam; right?

23 A Yes.

24 Q Okay. Earlier you said that when you  
25 went through to select which copies of The Bridge

1 to produce, you were looking for things that  
2 related to policies from the refugees. Why didn't  
3 you produce this copy of The Bridge?

4 A Well, that means the U.S. policy, and  
5 we, SEARAC, also agreed with that. It's to  
6 promote democracy and development.

7 Q Why didn't you produce this copy of The  
8 Bridge?

9 A That's civil society, and that's why we  
10 show that we have a good cause as refugees.

11 Q Let me ask you again. Move to strike as  
12 nonresponsive.

13 This copy of The Bridge had to do with  
14 policies of refugees, and earlier you said you  
15 produced the copies of The Bridge that had to do  
16 with the refugee policies. Why didn't you produce  
17 this one?

18 A So this is because we are refugees and we  
19 feel that we have a mission. That's why the works  
20 come from the CSCE thing. That means the policy  
21 is to build society, civilian society in Vietnam.  
22 That's why some hardliner disagreed with me, and  
23 that's why Thang took advantage of that.

24 MR. HART: Hang on a second.

25 MR. VOSS: Move to strike as

1 nonresponsive.

2 MR. HART: Have you seen this before  
3 today?

4 THE WITNESS: Yes.

5 MR. HART: Do you have a copy of this  
6 page at your house in your materials?

7 THE WITNESS: I have it in The Bridge.

8 MR. HART: Okay.

9 THE WITNESS: In The Bridge. I have  
10 copies of The Bridge at home.

11 BY MR. VOSS:

12 Q All of them? You have copies of every  
13 issue of The Bridge?

14 A Uh-huh.

15 Q Is that correct?

16 A I believe that this is in The Bridge.

17 Q And you believe you have a copy of that?

18 A I need to check again, but I believe it.

19 MR. HART: So is there any particular  
20 reason why you didn't include this in the  
21 materials you sent to me? Do you understand the  
22 question? Is there any particular reason why you  
23 passed over this and didn't give this one to me?

24 THE WITNESS: I don't know what I gave  
25 you, but I just told my children, okay, took some

1 of The Bridge and show them that I pay attention  
2 to this, that The Bridge don't print things like  
3 that. It is always Le Xuan Khoa, no doctor.  
4 That's it. That's what I am interested in.

5 MR. VOSS: Okay. I'd like to have that  
6 marked then as Exhibit No. 7.

7 Q Have you ever heard of the Vietnamese  
8 American Education Foundation?

9 A Yes.

10 Q Can you generally describe -- well,  
11 strike that.

12 Were you a director of the Vietnamese  
13 American Education Foundation?

14 A No. Vietnamese Education Foundation?

15 Q You were not a director?

16 A I'm not director.

17 Q Were you a director previously? Not now.  
18 At some time in the past were you a director?

19 MR. HART: Meaning on the board of  
20 directors?

21 MR. VOSS: Yeah.

22 MR. HART: Were you ever on the board of  
23 directors?

24 THE WITNESS: I maybe on the board -- no,  
25 I remember. The Vietnamese Education Foundation

1 was a product of the U.S. Congress, and the  
2 director was Pham Duc Trung Kien, and he asked me  
3 to serve as a consultant. Okay, now I remember  
4 that. I was a consultant to this organization.

5 MR. VOSS: Okay. We'll be marking as  
6 Exhibit 8 a document that says it's a "Vietnamese  
7 American Education Foundation Introduction Home  
8 Page."

9 (Deposition Exhibit 8 was marked for  
10 identification by the court reporter.)

11 BY MR. VOSS:

12 Q And directing your attention to the  
13 bottom part of the page.

14 A This is different.

15 Q Wait a minute. Wait for a question, sir.  
16 Sir, sir, wait for a question, okay? That way we  
17 won't talk over the top of each other. Just wait  
18 for me to ask a question. Why don't you take a  
19 moment and look at the document, and then I'm  
20 going to ask you a question about it, okay?

21 A All right.

22 Q So you go look first, and then I'll ask.

23 MR. HART: Have you ever seen this  
24 before?

25 MR. VOSS: Counsel, you're not letting

1 him read it anymore than you're complaining about  
2 me.

3 THE WITNESS: I don't think I see this  
4 before.

5 MR. HART: Okay, then it's hearsay,  
6 objection.

7 THE WITNESS: I can't remember anything  
8 like that.

9 Okay. This is something different from  
10 what I say before earlier.

11 BY MR. VOSS:

12 Q Earlier you said something about being a  
13 consultant?

14 A The other one is Vietnamese --

15 MR. HART: Hold on. I need to take a  
16 break. I've got to take this call.

17 MR. VOSS: Fair enough. Off the record.

18 (Recess taken.)

19 BY MR. VOSS:

20 Q Back on the record. You've never seen  
21 this document before; is that correct?

22 A No. This one, no.

23 Q And you earlier said you --

24 A I may, but so far now -- but I know, I  
25 know about this already now. I remember why they

1 sent the document.

2 Q Why did they show you as a director, do  
3 you know?

4 A Okay.

5 Q Just that question first. Why are you  
6 listed as a director, do you know?

7 A That's the board of directors?

8 Q Correct.

9 A Okay. Because they respect me and they  
10 think that if I am on their board, they could work  
11 much better, more effectively.

12 Q Were you on their board?

13 A I accept as a sympathy and see whether it  
14 work or not.

15 Q So the answer is yes, you were on their  
16 board; is that correct?

17 A Yes.

18 Q Okay. All right. I'd like to then mark  
19 this as Exhibit 9.

20 (Deposition Exhibit 9 was marked for  
21 identification by the court reporter.)

22 BY MR. VOSS:

23 Q Next I'd like to show you a document that  
24 says it's a Schedule of Classes and Seminars. Do  
25 you see that document?



1 MR. HART: Can you read this? The font  
2 is pretty small.

3 THE WITNESS: Yeah, too small for me.

4 MR. HART: But I can read that it does  
5 say "Schedule of Classes and Seminars."

6 MR. VOSS: Seminars.

7 Q And then you are listed as being -- the  
8 location of the class is Audio Visual 134, and  
9 this is January 19 of 1985. Is this when you were  
10 teaching at Johns Hopkins?

11 A I didn't teach anywhere.

12 Q So here is a Schedule of Classes and  
13 Seminars, January, February, March 1985 it says on  
14 the top. Where would you have been giving a class  
15 or seminar?

16 A I was at SEARAC, and I don't remember  
17 anything like this. What's the course about and  
18 what's the classes? I didn't teach any class.

19 Q Okay. So this doesn't refresh your  
20 recollection as to teaching --

21 A This one is very not familiar to me at  
22 all.

23 Q All right.

24 A Maybe people just, you know, put my name  
25 on it.

1           MR. HART: Hold on. Don't worry about  
2 trying to figure out where this came from. If you  
3 don't recognize it and it doesn't cause you to  
4 remember anything, just tell him that.

5           THE WITNESS: Okay. I don't recognize  
6 this.

7           MR. VOSS: Still mark as it as Exhibit 9.

8           Next I want to show you a document in the  
9 World Refugee Report from September of 1985, and  
10 it includes a photo on page 2.

11           (Deposition Exhibit 10 was marked for  
12 identification by the court reporter.)

13 BY MR. VOSS:

14           Q     Do you recognize yourself in that  
15 photograph? Are you pictured in the photograph,  
16 second page?

17           A     Oh, this is familiar, yeah. I know we  
18 visited the State Department, and this is photo  
19 was taken there. This is my board member.

20           Q     And which one of them are you?

21           A     Huh?

22           Q     Which person in this photo are you? Are  
23 you the first, second, third, fourth?

24           A     I know all of them.

25           Q     Which one is you?

1           A       Oh, I'm just in between the two  
2 Americans.

3           Q       The third person?

4           A       Yeah, the third person from the left.

5           MR. HART: I'll say it for the record.  
6 He's the dark suit between the two light suits.

7           MR. VOSS: That's probably a better way  
8 to put it. Thank you.

9           THE WITNESS: Uh-huh.

10 BY MR. VOSS:

11          Q       Would you agree with what your counsel  
12 said, that you're the dark suit between the two  
13 light suits; is that correct?

14          MR. HART: That's you right there; right?

15          THE WITNESS: Yes.

16          MR. VOSS: Okay.

17          THE WITNESS: And this is Ambassador -- I  
18 forgot -- Moore, yeah.

19 BY MR. VOSS:

20          Q       In the caption to the photograph, okay --

21          A       Yeah, here.

22          Q       -- that says who's in the picture, you  
23 were referred to as Dr. Le Xuan Khoa. Do you see  
24 that?

25          A       Yeah, the people who print this, who

1 published this, not me.

2 Q Why would they have been calling you  
3 doctor, do you know?

4 A Well, as I said, people call me professor  
5 or doctor. That's up to them, not me.

6 Q Okay.

7 A And I accept that.

8 Q All right.

9 A I don't need to correct every time.

10 Q All right. I would like to mark that as  
11 Exhibit 10.

12 Next I'd like to show you a document.

13 A Yeah, I see, yeah.

14 Q It's on IRAC stationery again; correct?  
15 Do you see that on the top? That's IRAC  
16 stationery up here --

17 A Yes.

18 Q -- the top of the document?

19 A Yes, uh-huh.

20 Q And that's your signature on the first  
21 page, is it not?

22 A Yes, that's my signature.

23 Q Okay. And do you remember participating  
24 in a small business seminar in May of 1986?

25 A Very likely.

1 Q Okay. And on the last page of these  
2 three pages, Appendix H --

3 A Yeah, Dr. Le Xuan Khoa, right.

4 Q No. 11, Dr. Le Xuan Khoa --

5 A Yeah.

6 Q -- do you see that there?

7 A Yeah.

8 Q So this isn't other people calling you  
9 doctor. This is IRAC calling you doctor.

10 A That's other people who called me so,  
11 right.

12 Q This is an IRAC document. It's not some  
13 third group, the Secretary of State or something  
14 else. This is the place that you worked calling  
15 you doctor; right?

16 A Yeah.

17 Q Okay. Mark this as Exhibit 11.

18 (Deposition Exhibit 11 was marked for  
19 identification by the court reporter.)

20 MR. HART: Is it, is that what this is?

21 MR. VOSS: He said yes.

22 THE WITNESS: Yeah.

23 MR. VOSS: He said yes again.

24 THE WITNESS: So this is a program I  
25 cooperate, so they write it, not me.

1 MR. VOSS: There's no question pending.  
2 Please move to strike.

3 MR. HART: Pass it on to the court  
4 reporter.

5 THE WITNESS: It's not my writing.

6 BY MR. VOSS:

7 Q There's no question pending, so don't  
8 keep talking. Wait for the next question, okay?

9 All right. Next I'm going to show you a  
10 letter from the Department of Health and Human  
11 Services dated November 16, 1987.

12 (Deposition Exhibit 12 was marked for  
13 identification by the court reporter.)

14 BY MR. VOSS:

15 Q Do you see that? Do you recognize this  
16 document?

17 A Yeah, that seems familiar to me, the name  
18 of him, James McLaughlin, and this kind of  
19 activity is normal to me.

20 Q Okay. And this is -- I note on the top  
21 of this this is from the Contracts Office. This  
22 had to do with getting more money from the U.S.  
23 Government; correct?

24 MR. HART: Do you know what this means?

25 BY MR. VOSS:

1 Q Is that a correct statement?

2 A Yes, okay. They want to give additional  
3 funds maybe.

4 Q Uh-huh.

5 A They like our program. That's it.

6 Q Okay. So the letter is addressed "Dear  
7 Dr. Khoa."

8 A Because people call me, right.

9 Q Including the Contracts officer of the  
10 Department of Health and Human Services, he  
11 thought you were Dr. Khoa?

12 A Yeah.

13 Q Did you correct him?

14 A I don't have to correct, but I accept it.

15 Q So you accepted that they thought you  
16 were a doctor?

17 MR. HART: That's not what he said.  
18 Mischaracterizes his testimony.

19 BY MR. VOSS:

20 Q Is that correct?

21 I'm asking him whether that's a correct  
22 statement.

23 You accepted that they thought you were a  
24 doctor?

25 A That's the usual way. I accept that

1 people used to call me either professor or doctor,  
2 and I don't need to correct it every time, that's  
3 right.

4 Q Did you correct it any time?

5 MR. HART: Did you sometimes correct  
6 them?

7 BY MR. VOSS:

8 Q I haven't seen a single time. Can you  
9 show me any document where you ever corrected  
10 somebody from the notion that you were a doctor?

11 A I consider this as normal. That's it.

12 Q Is there any document you have where you  
13 ever said to anybody I'm not a doctor? Did you  
14 ever put that in writing?

15 A No, I don't have to call it -- I don't  
16 have to say other things.

17 Q I'm asking you specifically. Please  
18 listen to the question carefully.

19 A Yeah.

20 Q Did you ever at any time correct anyone  
21 when they referred to you as doctor?

22 A No.

23 Q Thank you. I'll mark that as Exhibit 12.

24 I'll take a two-minute break to confer  
25 with counsel and I think I'm probably done.



1 MR. HART: We welcome your two-minute  
2 break.

3 MR. VOSS: Thank you.

4 (Recess taken.)

5 MR. VOSS: Notwithstanding the fact that  
6 there are an outstanding continuing meet and  
7 confer regarding what we contend to be defective  
8 discovery that is out there which may necessitate  
9 a revisiting of the deposition depending on what  
10 else is late produced at this time, I have no  
11 further questions at this time.

12 MR. HART: Okay. That's perfectly  
13 acceptable, and we appreciate your brevity.

14 MR. VOSS: We need to expedite the  
15 transcript, and then all you guys in Orange County  
16 do everything per code.

17 MR. ERIGERO: Right.

18 THE REPORTER: Mr. Hart, did you need a  
19 copy?

20 MR. HART: Yes, ma'am, electronic only.

21 (Whereupon the proceedings  
22 were concluded at 12:36 P.M.)

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REPORTER'S CERTIFICATION

I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were placed under oath; that a verbatim record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my direction; further, that the foregoing is an accurate transcription thereof.

I further certify that I am neither financially interested in the action nor a relative or employee of any attorney of any of the parties.

IN WITNESS WHEREOF, I have this date subscribed my name.

Dated: July 30, 2024

*Nancy Collier Hamada*



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NANCY COLLIER HAMADA  
CSR No. 5819

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Our Assignment No. 1179408  
Case Caption: KHOA XUAN LE  
vs. NGUYEN DINH THANG; BOAT PEOPLE S.O.S., INC.,  
et al.

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I declare under penalty of perjury that I  
have read the entire transcript of my Deposition  
taken in the captioned matter or the same has been  
read to me, and the same is true and accurate,  
save and except for changes and/or corrections, if  
any, as indicated by me on the DEPOSITION ERRATA  
SHEET hereof, with the understanding that I offer  
these changes as if still under oath.

Signed on the \_\_\_\_\_ day of \_\_\_\_\_,  
20\_\_.

\_\_\_\_\_  
KHOA XUAN LE

1 DEPOSITION ERRATA SHEET

2 Page No. \_\_\_\_\_ Line No. \_\_\_\_\_ Change to: \_\_\_\_\_

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KHOA XUAN LE

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| A                                                         |                                                                       |                                                                                                                                                            |                                                                                                                                        |
|-----------------------------------------------------------|-----------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
| <b>abiding</b><br>24:1,9                                  | <b>Advanced</b><br>39:22                                              | 70:12,22                                                                                                                                                   | 11:4 19:7 45:9                                                                                                                         |
| <b>able</b><br>74:7                                       | <b>advantage</b><br>83:23                                             | <b>answer</b><br>3:18 5:22 6:3 8:20<br>12:1 24:4,5,6 40:21<br>41:5 44:12 46:11<br>56:6 63:12 73:2,12<br>73:13 74:1,2 75:9<br>75:16,17,21,22<br>76:15 88:15 | <b>appoint</b><br>34:16                                                                                                                |
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