

1 A. I asked to see David Banks. I was told no by two
2 security guards and escorted from the building.

3 Q. After the security guards escorted you from the
4 building, did Mr. Banks ever call you back?

5 A. No.

6 Q. Did you continue in your attempts to call him?

7 A. Yes.

8 Q. Were you successful?

9 A. No.

10 Q. Did IRP ever pay Spherion on these invoices?

11 A. No, we were never paid.

12 MS. HAZRA: If I could have one moment, Your Honor.

13 THE COURT: You may.

14 MS. HAZRA: I have nothing further. Thank you.

15 THE COURT: All right. Thank you.

16 Mr. Banks?

17 MR. BANKS: Thank you, Your Honor.

18 **CROSS-EXAMINATION**

19 **BY MR. BANKS:**

20 **Q. Ms. Stephens, how big is Spherion?**

21 **A. It is a large corporation. I'm not sure of its**
22 **annual revenue.**

23 **Q. Would you be able to estimate; millions, billions?**

24 **A. I would imagine it is in the millions.**

25 **Q. Okay. What is Spherion's credit policy before they**

1 enter into an agreement with a new client?

2 A. Generally, we rely heavily upon a Dun & Bradstreet
3 report.

4 Q. So if the Dun & Bradstreet had come back outside of
5 the criteria, or lower than the criteria, Spherion does
6 not do business; is that correct?

7 A. That was a decision that was left up to each manager.
8 But we strongly relied upon that.

9 Q. Okay. Now, in your testimony a minute ago, you
10 mentioned that Mr. Banks said that this could be a
11 lucrative opportunity for Spherion; is that correct?

12 A. Yes.

13 Q. You also said -- and I will ask you, lucrative if the
14 development of the software was successful; is that
15 correct?

16 A. I was under the impression in the meeting that the
17 software was developed, and it was just a matter of things
18 being signed.

19 Q. A minute ago you testified lucrative if the
20 development of the software was successful. Do you recall
21 that?

22 A. I don't recall saying if the software was successful.

23 Q. Okay. I would like to take you to an interview done
24 and conducted by the FBI on January 25th of 2005. Do you
25 recall that interview or having that interview?

1 THE WITNESS: I have.

2 Q. (BY MR. BANKS) Would you say that this accurately --
3 that this report states that IRP --

4 THE COURT: Ask her your question.

5 MR. BANKS: All right.

6 THE COURT: You asked her if she remembered. She
7 said she didn't recall. Ask her if she recalls.

8 Q. (BY MR. BANKS) Do you recall your testimony now that
9 you provided to the FBI?

10 A. It says that here.

11 Q. It says what?

12 A. That IRP is trying to secure a large contract with
13 the NYPD.

14 Q. Okay. Now, do you consider Spherion an
15 autonomous-type of organization? They are responsible for
16 making their own decisions; correct?

17 A. Yes.

18 Q. Mr. Banks, IRP, or any other company cannot force
19 Spherion to do anything they don't want to do; is that
20 correct?

21 A. That would be correct.

22 Q. And based on that, Spherion, as a large corporation,
23 has put in policies and procedures that guides its
24 decision making with new clients; is that correct?

25 A. That would be correct, yes.