

- 1 I only remember meeting David that particular day.
- 2 Q. During that meeting, did you get any information from
- 3 Mr. Banks about what kind of business IRP was engaged in?
- 4 A. Yes.
- 5 Q. What did Mr. Banks tell you about that?
- 6 A. They made software, or something like that, for the
- 7 New York Police Department.
- 8 Q. Did you get any information from him about the status
- 9 of IRP's business with the New York Police Department?
- 10 A. The status about that?
- 11 Q. Let me ask you a different question.
- 12 A. Please.
- 13 Q. Did Mr. Banks make any statements about whether or
- 14 not that business was active, whether it was in the
- 15 future, anything like that?
- 16 A. I don't recall specifically. But I was under the
- 17 impression, not based on anything he said, that it was
- 18 active. It was in force.
- 19 Q. Okay. And after that meeting, did you run any type
- 20 of a credit check on IRP?
- 21 A. No, I did not.
- 22 Q. Was that -- did Snelling -- was that a part of
- 23 Snelling's practice, to run credit checks on prospective
- 24 customers?
- 25 A. We did not do that, no.

1 impression -- you used the term that under your impression
2 that business was active, correct?

3 A. Where are we speaking about?

4 Q. With the NYPD. This is in your previous testimony on
5 direct examination.

6 A. Oh, today, yes.

7 Q. So that was just your impression. Nobody gave you
8 any indication that there was any -- contract wise or
9 otherwise going on with the NYPD; correct?

10 A. Well, I was told that you did that work.

11 Q. Did what work?

12 A. Software stuff for the NYPD.

13 Q. Software stuff. Okay, all right.

14 MR. BANKS: I have no further questions.

15 THE COURT: Anyone else?

16 Any redirect?

17 MR. KIRSCH: Yes, please, Your Honor.

18 **REDIRECT EXAMINATION**

19 **BY MR. KIRSCH:**

20 Q. Ms. Peterson, this -- the information that you got
21 that IRP did software work for the NYPD, did you -- what
22 was your understanding about what relationship, if any,
23 that work was going to have to IRP's ability to pay the
24 bills for those employees you were payrolling?

25 A. Well, that was their client. So their client would