- 1 A. Of our company.
- 2 Q. All right. And how is it, then, that CTG was going
- 3 to make money from hiring these new employees?
- 4 A. Well, there is a certain fee in this case that we
- 5 were to pay them. And I negotiated an uplift with DKH.
- 6 And the difference between the two is what profit we make.
- 7 Q. All right. So am I correct that the uplift is the
- 8 amount that you would bill DKH?
- 9 A. Correct.
- 10 Q. All right.
- 11 A. On top of the salary.
- 12 Q. On top of the salary that you paid to those
- 13 employees?
- 14 A. Correct. Uh-huh.
- 15 Q. All right. Did you have any -- let me ask you a
- 16 different question. Was that -- relative to other kinds
- of business that you were doing at CTG at the time, was
- that a relatively profitable kind of business for you to
- 19 do?
- 20 A. No.
- 21 Q. Did you have any expectation that the relationship
- 22 might lead to more profitable business?
- 23 A. That was the reason I did it. It was more like an
- 24 investment.
- 25 Q. And what was the basis for your thinking that you

- 1 A. We are in Colorado Springs.
- Q. Okay. And tell us what else you remember about the
- 3 office, itself.
- 4 A. Well, it was not busy, I recall that. I wanted to
- 5 meet with the two employees that I had met, and there
- 6 seemed to be offices open. And I was guided to one of
- 7 those offices. And then I saw no one else. So -- there
- 8 was a big wall there that I think something was on the
- 9 other side of it at that time. But there wasn't very much
- 10 going on.
- 11 Q. Did you have any discussion when you were back at the
- office about a company called IRP?
- 13 A. Yes, briefly.
- 14 Q. What do you recall being said about IRP?
- 15 A. IRP was the major company. DKH was a subsidiary.
- 16 Q. Did you have any discussion, during this meeting back
- 17 at the office with Mr. Stewart, more about what DKH's
- 18 business was?
- 19 A. A bit more.
- Q. What else did he tell you about that?
- 21 A. He talked about their supporting applications for
- 22 criminal justice systems. I didn't get a lot of detail
- 23 about that. I know one of the applications he talked
- 24 about was Cobra. That was the main software. And not a
- 25 lot more about the interrelationships of IRP and DKH.

- Q. Was there more discussion about any companies with
- 2 which DKH was doing business? Was it explained who the
- 3 software was being built for?
- A. They didn't mention companies in specific. But he
- did say there was business that they were pursuing with
- 6 New York.
- Q. Did you have an understanding after that conversation
- 8 about whether or not there was business in place with New
- 9 York?
- 10 A. No.
- 11 Q. All right. At some point -- you did enter this
- 12 relationship; you hired the employees --
- 13 A. Yes.
- 14 Q. -- and placed them at DKH; is that right?
- 15 A. Yes.
- 16 Q. And once that relationship was under way, how was it
- 17 that your company kept track of the time that those
- 18 employees were working?
- 19 A. We have a time reporting system, electronic, that
- 20 they had to report time.
- 21 Q. Okay. Let me ask you to look now, please, at what is
- 22 marked for identification as Government's Exhibit 121.00.
- 23 A. 121?
- Q. Yes, sir. I'm sorry, I would like you to actually
- 25 look at 121.01.