

Exhibit 4

**Transcript of August 22nd, 2022,
Interview of Leanna Louie**

City Attorney Investigation of Department of Elections
City Attorney Case/File No.: [REDACTED]

Interview of: Leanna Louie
Interview Date: 08/22/2022

SR. INV SHAWN KELLY: Okay. This is San Francisco City Attorney Senior Investigator Shawn Kelly. Also present is Head Attorney for the City Attorney's Office of Public Integrity Investigations Unit, Keslie Stewart. It is Monday, August 22, 2022. It's approximately seven minutes after three o'clock in the afternoon. This is a recorded interview with Leanna Louie. This is regarding Case number [REDACTED] and Ms. Louie, this interview is being recorded with your knowledge and consent. Correct?

LEANNA LOUIE: Yes.

SR. INV KELLY: Okay. And also present is your attorney, Mr. Daniel Chung. Mr. Chung, this is being recorded with your knowledge and consent. Correct?

ATTY DANIEL CHUNG: Correct.

SR. INV KELLY: And Mr. Chung, you are recording this interview as well.

ATTY CHUNG: Yes, I'm creating a redundant copy.

SR. INV KELLY: Okay. And additionally, here with Ms. Louie is Christine Linnenbach, and Ms. Linnenbach, it's being recorded with your knowledge and consent. Correct?

ATTY CHRISTINE LINNENBACH: Correct, and I'm also Ms. Louie's attorney.

SR. INV KELLY: Okay. So could each of you, starting with you, Ms. Louie, say and spell your name for the person who will transcribe this?

LOUIE: Yes. My name is Leanna Louie, spelled L-e-a-n-n-a, L-o-u-i-e.

SR. INV KELLY: Okay. Mr. Chung?

ATTY CHUNG: Daniel Chung, D-a-n-i-e-l, C-h-u-n-g.

ATTY LINNENBACH: And Christine, C-h-r-i-s-t-i-n-e, Linnenbach, L-i-n-n-e-n-b-a-c-h.

SR. INV KELLY: Okay, great, thank you so much. So Ms. Louie, let's dispense with a completely peripheral matter before we even begin the preliminary questions. I sent to you and Mr. Chung the City Attorney expectations for visitors coming into our offices regarding COVID-19. It asked for you to monitor any symptoms you have this morning, and the same questions that you would receive at a doctor's office, whether you've been around anyone who's had COVID in the last 14 days or that series of questions. Did you self-analyze and clear yourself this morning?

LOUIE: Yes, I did.

SR. INV KELLY: Okay, and Mr. Chung?

ATTY CHUNG: Yes.

SR. INV KELLY: And Ms. Linnenbach?

ATTY LINNENBACH: Yes, I did.

SR. INV KELLY: Okay. Then I'm going to take off my mask now and we can proceed without that. So Ms. Louie, this is probably a good time to remind you about who we are and what we're doing here. You received a letter dated August 15, 2022, from Deputy City Attorney Andrew Shen, inviting you to this interview. Correct?

LOUIE: Yes.

SR. INV KELLY: And the date of this interview has changed a couple of times since that original letter. Right?

LOUIE: Yes.

SR. INV KELLY: And as the letter explains, I'm an investigator with the City Attorney's Office, and as you probably know, the City Attorney is the attorney for all of the departments in the City and County of San Francisco, and in this particular circumstance, our office has been asked by the Department of Elections Director John Arntz, that's spelled A-r-n-t-z, to investigate questions pertaining to your residency and the effect on your qualification to run for Supervisor in San Francisco District 4 in the November 2022 election. So now, my job as an investigator is to ask questions, gather documents, and eventually I will report my findings to the attorney's in our office who advise the Department of Elections, and they in turn will apprise Mr. Arntz of our findings.

LOUIE: Okay.

SR. INV KELLY: So I'm just a factfinder, I'm not a decision-maker, you understand that?

LOUIE: Yes, I do.

SR. INV KELLY: Okay. And let me say at the outset that if you need, for any reason, to take a break in this interview, either to confer with your attorneys or to use the bathroom, just let me know and we'll break whenever you want to. Okay?

LOUIE: Okay.

SR. INV KELLY: So, did you bring any additional documents with you this afternoon?

ATTY CHUNG: We did. So, we're very grateful for the opportunity to share more information and definitely clear her name in this issue. What we thought we would do is first have Ms. Louie read a statement that kind of summarizes the issues and the facts that I'm sure you'll be asking about, and we'll open it up to any questions that you have regarding her statement or any other follow-up questions that you have. We also brought a significant number of documents to help corroborate her testimony today, the first of which is many declarations that have been signed by individuals who are going to corroborate some of the facts that she will testify to. There are also bills and other documents like that that will help corroborate her residence; some of them you listed in your request on August 15th. Then we also brought some pictures of her residence.

We also invite your office to come to her residence, if you'd like to do an actual visual inspection of her residence. She is open to having any and all of you guys there if you would like to visit, and we're happy to share the contact information for all of the individuals who signed declarations as well, if you want to follow-up with them and have further interviews.

SR. INV KELLY: Okay. And have you brought copies for us?

ATTY CHUNG: Yes, we did.

SR. INV KELLY: Okay, great. Okay, so Ms. Louie, by all means, proceed with your statement.

LOUIE: Okay.

ATTY CHUNG: So we counseled her to make a statement first, before answering your questions.

LOUIE: Okay. These guys are so thorough. So, my name is Leanna Louie. I grew up in San Francisco and I joined the Army in 1990. I served in the Army for 11 years active duty, so I traveled around the world quite a bit, and because of my frequent travels, my parents' home in San Francisco District 10, [REDACTED] Bridgeview Drive, has always been my home of record. In other words, all of mail has been going there since I got my driver's license when I was 16 years old in 1988 and I've never changed it. I've always voted out of that address because I was stationed overseas several times. More recently, my two sons, an adult and a minor, live at [REDACTED] Ramsell Street, which is in District 11. In April 2021, I purchased and financed the home with my cousin and my adult son, but I do not live there, my adult son lives there.

Around August 2021, I rented in San Francisco's District 4, address—[REDACTED] 22nd Avenue, to facilitate my minor son's walking to Washington High School. However, a mold build-up forced me around January 2022, to relocate temporarily back to my parents' house at [REDACTED] Bridgeview Drive in D10. On March 1, 2022, I executed a lease agreement for [REDACTED] 35th Avenue in San Francisco's District 4; however, I stayed at my parents' home while looking for furniture and beginning the moving process. As part of the moving process, on March 8, 2022, I went online and registered to vote for my future home in D4. I was informed that I would be notified when my registration was finalized; I received an email after I made the registration.

Unbeknownst to me, based on my eligibility, the Department of Elections had already printed ballots for the April Special Election for the State Assembly District 17 seat. I am informed that Department of Elections mailed me a ballot for elections around March 17, 2022, to my parents' house at [REDACTED] Bridgeview Drive. Believing that my new registration, my voter registration in D4 was still being finalized and still pending, and at the same time receiving a ballot for the State Assembly race, while I'm still trying to move out of my father's house, I went ahead and voted for the April Special Election.

On March 23, 2022, I ordered a new queen-size mattress for my new rental in District 4 and it was delivered the next day. A few days later on March 26th, I held a housewarming party at [REDACTED] 35th Avenue, my new place, and it was quite well-attended; over 30 people came to wish me well in my new place. Unbeknownst to me, the Department of Elections had unilaterally changed my voter registration back to my D10 address at [REDACTED] Bridgeview Drive, based on my vote in the Special Elections in April. I'm informed that Department of Elections received the ballot, but changed my registration on or around April 7, 2022, and I only found out because I went into Department of Elections and questioned them when I received a ballot on May 7th at

my father's house. When I received it over the weekend, I was like really confused, so I went online and I re-registered to my D4 address.

The next business day, on Monday, May 9th, I physically went to Department of Elections to clear up the confusion. At the Department of Elections, I was informed of the unilateral change that they had made to my voter registration during the April Special Elections. They told me it was automated. Thus, I clarified that I wanted my voter registration to reflect my D4 address and that I wanted to vote in-person on the same day, which I did. My voting there on the same day voided both the ballot that was sent to my father's house and the ballot that was sent to my new D4 address. Believing in good faith that I had sufficiently resided in D4 for several months now and was a registered voter, I filed my declaration of candidacy on June 3, 2022.

SR. INV KELLY: Is that the conclusion of your statement?

LOUIE: Yes, sir, it is.

SR. INV KELLY: Okay.

ATTY LINNENBACH: Do you want to give them the pictures now of the residence?

LOUIE: Sure.

ATTY CHUNG: Do you want the documents ahead of time or do you want to ask the questions first?

DCA KESLIE STEWART: I would like the documents ahead of time.

SR. INV KELLY: Okay, we'll take the documents ahead of time.

ATTY CHUNG: Okay, let's do it one at a time.

DCA STEWART: No, I just thought you could hand them over to me and I could look at them.

ATTY CHUNG: Well, I want to make a record of what we're turning over.

SR. INV KELLY: Okay.

DCA STEWART: Can you do that after I look at them?

ATTY CHUNG: I want to make sure I make a record of what I'm handing you, before you actually look at them.

SR. INV KELLY: Okay, please do so.

ATTY CHUNG: So, we're handing over a two-page document, which is a residential lease or month-to-month rental agreement for the D4 address. We're handing over an email dated March 8th, this is the voter registration that Ms. Louie talked about for her D4 address.

ATTY LINNENBACH: That's the residential application to change her registration?

ATTY CHUNG: Right. We're also handing over a one-page document sent to her Yahoo email from Mattress Firm, confirming a mattress purchase for her new D4 address. We're also handing over a one-page document from Mattress Firm, also emailed to the same Yahoo email account confirming delivery the following day. We're also handing over a one-page document, a letter from the U.S. Department of Veterans Affairs showing her D4 address listed and her identification card also indicated in the letter. It looks like it was received on April 7th of this year. We're also handing over a one-page document, another voter registration notification from May 7th of this year, re-registering her again for the D4 address. We're handing over a one-page document from Chase Bank. It's a statement, March 17th through April 18th of this year, indicating her new D4 address. Another one-page document from Chase Bank, April 19th through May 17th of this year, also indicating her new D4 address. Another one-page document from Chase Bank dated May 18th through June 16th indicating her new D4 address. A mortgage statement from Chase Bank, statement dated May 10th, also indicating the new D4 address.

Now, we're moving on to several declarations signed by various individuals attesting to Ms. Louie's testimony. The first is a one-page letter signed by George Erickson.

LOUIE: My landlord.

ATTY CHUNG: A one-page declaration signed by Meina Young. A one-page declaration signed by Steven Lee, a one-page declaration signed by Sherry Lau, a one-page declaration signed by Selena Chu, a one-page declaration signed by Winnie Fung, a one-page declaration signed by William Lee, a one-page declaration signed by Marina Roche, a one-page declaration signed by Roger Moy, a one-page declaration signed by Frances Tai. A one-page document signed by Freeman Leong, a one-page document signed by Robert Lowe, and we also have two sets of pictures, they're really collages. The first collage has a Facebook post indicating her housewarming party, as well as nine different photographs showing different friends or acquaintances at her housewarming, this is the new D4 address. And a second collage of 11

photos showing her room in that D4 address, the room that she rents, and I believe that is the totality of the documents that we're turning over today.

SR. INV KELLY: Okay.

ATTY LINNENBACH: And if you require additional information after reviewing those documents, we'd be more than happy to assist you in your investigation, and we'll be happy to turn over more information that you require.

SR. INV KELLY: Thank you. Okay and I want to acknowledge as well, Ms. Louie, that prior to this interview, you sent some documents to us via email exchange, either to us or to the Department of Elections, and we've seen, for example, your lease for [REDACTED] 35th Avenue and the letter from your landlord, Mr. Erickson.

LOUIE: Yes.

ATTY LINNENBACH: And we'd just like to also acknowledge that we've done this all as quickly as we could in order to accommodate you within a one-week period of time.

SR. INV KELLY: I understand that, thank you. Ms. Louie, in one of our email exchanges, you said that you needed time to find the documents. I think you said, "Let me find out my documents and bring them in. I might need to come closer to three p.m., since I will need some time to find items." Where were the documents located that you found for us?

LOUIE: They were all in my home, but just in different boxes.

SR. INV KELLY: And when your home, I think we should all be mindful of speaking specifically of addresses.

LOUIE: Of 35th Avenue.

SR. INV KELLY: Since that is the subject of this interview. So you're saying at 35th Avenue, they were in different boxes.

LOUIE: Yeah.

SR. INV KELLY: And that's where you went to look for the documents that you brought in here today.

LOUIE: Yes.

SR. INV KELLY: Okay.

LOUIE: I also have many bags, many shopping bags where I put stuff, so I had to go through all my shopping bags and my boxes to find them.

SR. INV KELLY: Okay. So, before we get into the meat of the interview, it would be helpful for me to try to get as broad a picture of your life as possible. So, you've given us a lot of it in the opening statement, but I want to walk you through that to make sure that I have a real firm grounding in the things that really constitute your life in San Francisco.

LOUIE: Yes.

SR. INV KELLY: So your birth date is [REDACTED]. Correct?

LOUIE: Yes, sir, it is.

SR. INV KELLY: And that makes you the rare leap year.

LOUIE: Twelve-and-a-half years old.

SR. INV KELLY: Well, you wear it well. And you were born in San Francisco?

LOUIE: No, I was born in Toisan China. I was born in a poor, farming village.

SR. INV KELLY: Okay. And when did you come to this country?

LOUIE: When I was seven years old in 1979.

SR. INV KELLY: Okay. And I take it your parents came at the same time?

LOUIE: Yes. I came with my grandfather, my mom, my dad, my older brother, my younger sister.

SR. INV KELLY: Okay. And you're referred throughout your statement to your parents' home at [REDACTED] Bridgeview Drive. Is that the home that you moved into when they moved to San Francisco?

LOUIE: No, we lived on Washington Street. We moved to [REDACTED] Bridgeview Drive in 1986.

SR. INV KELLY: Okay. But before that, your family was living on Washington Avenue?

LOUIE: Yes, [REDACTED] Washington.

SR. INV KELLY: Okay. Then you just reminded us that you joined the Army in 1990.

LOUIE: Yes, when I turned 18.

SR. INV KELLY: And that was right before Operation Desert Storm, was it not?

LOUIE: Yes.

SR. INV KELLY: And did you serve overseas in Operation Desert Storm?

LOUIE: I served overseas, but not in the Middle East, I was stationed in Germany.

SR. INV KELLY: Okay. And then, when did you get out of the Army?

LOUIE: Well, I got out the first time in '95 to do the ROTC program at Pacific Lutheran University, which is right outside of Fort Lewis, and then when I graduated, I became a commissioned officer in 1998, and I went back in full-time again active duty.

SR. INV KELLY: And how long were you in full-time from 1998?

LOUIE: My ETS date was January 31, 2001.

SR. INV KELLY: And ETS, help me.

LOUIE: Sorry, it stands for End of Term of Service.

SR. INV KELLY: Okay. And that was January what date?

LOUIE: The last day of January 2001.

SR. INV KELLY: Okay.

LOUIE: It was eight months before 911 happened.

SR. INV KELLY: Right. And Fort Lewis, where is that?

LOUIE: It's in Washington State, south of Seattle.

SR. INV KELLY: Okay.

LOUIE: The closest town would be Tacoma, Washington.

SR. INV KELLY: And did you live for those three years between 1995 and 1998 in Washington?

LOUIE: Yes.

SR. INV KELLY: Okay. And what are your parents' names?

LOUIE: My mother's name is Mongfong Louie, spelled M-o-n-f-o-n-g, L-o-u-i-e.

SR. INV KELLY: Okay.

LOUIE: And she's been in Heaven since 2017. [REDACTED] 2017, she passed away.

SR. INV KELLY: Okay. And your father?

LOUIE: My father is Quonwah Louie, Q-u-o-n-w-a-h, L-o-u-i-e. He is still alive and he's still living at [REDACTED] Bridgeview Drive with my older brother and my sister-in-law and their kids.

SR. INV KELLY: Okay. And what is your brother and your sister-in-law and their kids', what is your brother's name?

LOUIE: My brother's name is Peter, P-e-t-e-r, Louie, L-o-u-i-e.

SR. INV KELLY: Okay. And you just told me they've lived in that house since 1986. Correct?

LOUIE: Uh-huh.

SR. INV KELLY: And Ms. Louie, what is your current occupation?

LOUIE: I own a small business called Glim, G-l-i-m. It's a hand sanitizer business, it's a super-alkali water.

SR. INV KELLY: Okay. And do you have any other profession?

LOUIE: No, but I do have a VA income, Veterans Admin.

SR. INV KELLY: Okay. Have you been a real estate agent?

LOUIE: Yes, I still hold a license.

SR. INV KELLY: Okay. And do you still perform any real estate work?

LOUIE: No, just referrals, but I haven't done any for a long time.

SR. INV KELLY: And you work independently and not for an agency, is that right?

LOUIE: I don't work for an agency, no. I don't actually really practice, I just keep up my license.

SR. INV KELLY: When did you practice selling real estate?

LOUIE: The last time I sold a piece of real estate was 2000...it was more than ten years ago, I can't remember, more than ten years ago. I'd have to look, I don't remember.

ATTY LINNENBACH: If you don't know, just say you don't know.

LOUIE: Yeah, I don't remember. It's more than ten years ago.

SR. INV KELLY: Okay. And did you specialize in any kind of real estate when you were selling real estate, like commercial or residential or any particular part of town?

LOUIE: Mostly residential, but my sales were all in Sacramento, I didn't make any sales here.

SR. INV KELLY: Okay. And Ms. Louie, are you married?

LOUIE: I am not married, I'm divorced.

SR. INV KELLY: Okay. And what is your ex-husband's name?

LOUIE: Wei, W-e-i, last name H-o-n-g, Hong.

SR. INV KELLY: Okay. And where does he live?

LOUIE: Sacramento.

SR. INV KELLY: Okay. And did you ever live with him here in San Francisco?

LOUIE: No, never.

SR. INV KELLY: Okay. And am I correct that you sometimes go by the name Leanna Hong-Louie?

LOUIE: Yes.

SR. INV KELLY: Okay, so Louie is your name before you were married.

LOUIE: Maiden name.

SR. INV KELLY: And Hong your married name?

LOUIE: Yes.

SR. INV KELLY: Okay. And you mentioned that you have two children. Are these children that you had with your ex-husband?

LOUIE: Yes.

SR. INV KELLY: And what are their names and ages?

LOUIE: [REDACTED] he's 16 years old right now, and Wayan Hong, W-a-y-a-n, H-o-n-g, he's 28.

SR. INV KELLY: Okay.

LOUIE: He just became, [unintelligible] a birthday.

SR. INV KELLY: And I believe you told me that Wayan is the adult son that you referred to in this statement that you made at the beginning of the interview. Is that correct?

LOUIE: Uh-huh.

ATTY CHUNG: Just yes or no, don't say...

LOUIE: I'm sorry, yes. Yeah, I talked about both of my sons .

SR. INV KELLY: Right.

LOUIE: My adult son is Wayan and teenager is [REDACTED].

ATTY LINNENBACH: What we're getting to, is because this is going to be transcribed, it's best to say yes or no.

ATTY CHUNG: Not uh-huh.

ATTY LINNENBACH: Uh-huh.

LOUIE: Okay.

ATTY LINNENBACH: And since we're here to establish, I believe, residency for the last 30 days, I know you're trying to learn about Ms. Louie's life, but it's a long one. We're not going to go through all 50 years, are we?

SR. INV KELLY: I assure you it's not as long as my life.

ATTY LINNENBACH: Okay.

SR. INV KELLY: And I don't have any intention of turning this interview into something that will appreciably decrease the lifespan of us all.

ATTY LINNENBACH: Yeah, because it is uncomfortably warm in here and I was wondering if maybe we could have some water, if that wouldn't be too much to ask?

SR. INV KELLY: As I notified you in our preparation...

ATTY LINNENBACH: Should we bring water? We needed to bring water.

SR. INV KELLY: You needed to bring water yourself, and I'm sorry we can't accommodate you.

ATTY LINNENBACH: Okay, thank you. Thank you.

SR. INV KELLY: So, I know this is tedious, but bear with me, all of these questions will be helpful. Did you tell me that your adult son Wayan lives at [REDACTED] Randall Street?

LOUIE: Ramsell Street, yes.

SR. INV KELLY: Ramsell, I'm sorry, R-a-m-s-e-l-l.

LOUIE: Yes, he lives there.

SR. INV KELLY: Do you own any vehicles?

LOUIE: Yes, I do.

SR. INV KELLY: And what vehicles are registered to you?

LOUIE: Toyota Prius.

SR. INV KELLY: Okay. And where is that registered?

LOUIE: You mean address-wise?

SR. INV KELLY: Yeah.

LOUIE: At my father's place, [REDACTED] Bridgeview Drive.

SR. INV KELLY: I believe that the records show that your automobile, your 2015 automobile is registered at [REDACTED] - 22nd Avenue.

LOUIE: Is it?

SR. INV KELLY: And do you also co-own a vehicle with your son, Wayan?

LOUIE: Yeah, he's the primary driver. Is it the Ford Fusion?

SR. INV KELLY: It's a Ford, four-door Ford and it's registered in Sacramento at [REDACTED] Aldeburgh Circle, that's A-l-d-e-b-u-r-g-h Circle in Sacramento. Do you know what address that is?

LOUIE: Yeah, that's his father's house.

SR. INV KELLY: Okay. Has he lived with your father at the time that he registered his vehicle?

ATTY LINNENBACH: Objection, father. You said your...

LOUIE: His father.

SR. INV KELLY: I think I said his father, but if I didn't, I misspoke. So his father, did he live with his father when he registered that vehicle?

LOUIE: He still does weekend drills. He's in the Army National Guard.

SR. INV KELLY: Okay.

LOUIE: Which drills in Rancho Cordova, which is really close to Sacramento, where his father lives.

SR. INV KELLY: Okay.

LOUIE: And he prefers to pick up his mail there at his father's house, so he registered there, yes.

SR. INV KELLY: Okay.

LOUIE: And he goes there every weekend almost.

SR. INV KELLY: So, have you ever owned real property?

LOUIE: With his father?

SR. INV KELLY: Like have you ever had title to real property anywhere?

LOUIE: Yeah.

SR. INV KELLY: Okay. And in San Francisco, have you ever had title to real property?

LOUIE: Yeah.

SR. INV KELLY: And where?

LOUIE: ■ Ramsell.

SR. INV KELLY: Okay. And so that was a purchase that I believe you made in the Spring of 2021. Is that right?

LOUIE: Yes, with my cousin and my older son.

SR. INV KELLY: Okay. And is your cousin Robert Lowe, L-o-w-e?

LOUIE: No, that's my fiancé.

SR. INV KELLY: Okay. And is he also one of the owners of [REDACTED] Ramsell?

LOUIE: Yes, he's a partner in it, yes.

SR. INV KELLY: Okay. And he and you are the two signatories on the title of the property. Is that right?

LOUIE: We are on the title, yes.

SR. INV KELLY: And you are the two people who signed the deed of trust for the loan for the property. Is that right?

LOUIE: For the loan, it's my cousin, me, and my son. My cousin is Ronney Louie.

SR. INV KELLY: I'm going to give you a copy of the deed of trust, which is the loan, and I've marked where there's a question of occupancy, but if you will turn to page 11 of 12, there are two people that have signed as the borrower for the loan, and it is you and Robert Lowe.

LOUIE: This is the loan?

SR. INV KELLY: It's the deed of trust, it's the loan for your house there.

LOUIE: That's my fiancé.

SR. INV KELLY: That's right, but you said that there were three people on the loan for the property.

LOUIE: Yeah.

SR. INV KELLY: There are only two signatures here.

LOUIE: This is for, this is the title.

SR. INV KELLY: No, this is the deed of trust.

LOUIE: I mean deed of trust, but no, for the loan, no, this is recorded. I gave you the document.

ATTY CHUNG: So, it looks like it's a deed of trust and it's being returned to Loandepot.com

LOUIE: Uh-huh.

ATTY CHUNG: Do we have those documents?

SR. INV KELLY: I don't know, this is the only recorded document that I have pertaining to the loan. If you have further documents that show the three people on the loan agreement that you referenced, that would be great.

ATTY LINNENBACH: Yeah, maybe we could get that to you.

SR. INV KELLY: Okay, that would be helpful.

ATTY LINNENBACH: And I'd just like to say that if you had had this on Friday, we would have appreciated having this, so that we could have cleared it up for you. And for the record, we did ask you for a list of questions and we were denied the opportunity to be provided that, because these types of miscommunications, Ms. Louie did not—she came here in good faith. We would have clearly provided you with more information and been able to provide you with more information had we known the direction that this interview was going to be going.

DCA STEWART: Excuse me, can I speak to that?

SR. INV KELLY: Sure.

DCA STEWART: Yeah. I mean you're a former Assistant District Attorney, you're a litigator. It is highly unusual to provide questions in advance of any sit-down, when the topic of this interview is abundantly clear, but we absolutely welcome your cooperation and would be glad to accept any additional documents that you want to provide to us.

ATTY LINNENBACH: Well, I guess if you're trying to be adversarial, yes, but we're trying actually to not be adversarial, and usually, when I've engaged in situations where you're trying to be collegial and not be adversarial, I've engaged in numerous situations where people have exchanged questions for the purpose of not being litigious or adversarial.

DCA STEWART: Thank you.

ATTY LINNENBACH: But I understand your position clearly.

DCA STEWART: We are not trying to be adversarial; however, we want to get your client's answers and not yours. We were hoping to just have more of a freeform dialogue with her. She seems more than open to having that with us.

ATTY LINNENBACH: She is, but we're just saying we would like to be able to provide you with as much as we can.

LOUIE: Robert's on the deed because, can I tell you?

DCA STEWART: That would be great.

ATTY CHUNG: No, no, because that question has not been asked. Only answer questions that have been asked and I think the main thing is we want to be clear about what document we're looking at and what signatures are on what documents.

SR. INV KELLY: Okay.

ATTY CHUNG: So if the question is about certain signatures on certain documents, let's just clear that up, and if another question is asked, then you can answer it.

DCA STEWART: I'd love to just have her sort of explain it to us.

ATTY CHUNG: Well, ask the question. Ask whatever question you want.

SR. INV KELLY: On the deed of trust, you and your fiancé are the signatories on this and you said that on the actual loan agreement, there are three signatories, you, your fiancé, and who's the third one?

LOUIE: No.

SR. INV KELLY: No?

LOUIE: So, my fiancé and I put money together as down payment, that's why he's on the deed of trust.

SR. INV KELLY: Okay.

LOUIE: Okay? But we didn't have enough to pay the entire price of the house, so I got a loan with my cousin, who has a full-time job, and my son who has a full-time job.

SR. INV KELLY: Okay. All right.

DCA STEWART: What's the amount of that loan?

LOUIE: About [REDACTED].

SR. INV KELLY: Okay. All right.

DCA STEWART: Can you provide us with all the documents related to that purchase after the interview?

LOUIE: Of course, absolutely.

DCA STEWART: Thank you.

SR. INV KELLY: And have you ever lent money to someone else for the purpose of purchasing property?

LOUIE: No, I don't have money like that.

SR. INV KELLY: Okay.

LOUIE: I wish I did though.

SR. INV KELLY: So you said, in an email to me, that you returned to San Francisco in 2012. Is that right?

LOUIE: Yes, that's correct.

SR. INV KELLY: What did you do in-between January 2001, when you got out of the military, and 2012, when you moved to San Francisco?

LOUIE: January, at the end of January when I got out of the Army, I moved back to San Francisco. I worked for Supervisor Jake McGoldrick for about six months, and my employment was terminated in about, I think maybe July, then I was seeking employment. I helped with campaigns, I ran a campaign myself. Then I moved to Sacramento around December 2001. I got a job there as an office manager for Primrose. Let's see, then I applied for jobs with the City of

Sacramento and I was hired on to work for the Neighborhood Services Department. About a year after that, I got an offer for a promotion at Solid Waste Division as an analyst, and then about a year after that, I got another offer for promotion at the fire department, at HR at the headquarters.

SR. INV KELLY: So did you live in Sacramento or at the Sacramento area between December of 2001, when you moved there and 2012, when you moved back to San Francisco?

LOUIE: Yes, I did.

SR. INV KELLY: Okay.

LOUIE: I owned a home there and I worked there.

SR. INV KELLY: Okay. That home that you owned there, is that the same home that your son uses as an address when he's in Sacramento?

LOUIE: Yes. When we divorced, our properties were split and my ex bought my portion. So he owns the property all to himself. I can't remember what year, maybe 2012 or '13.

SR. INV KELLY: Okay. So that's the Aldeburgh address, [REDACTED] Aldeburgh. Is that right?

LOUIE: Yeah.

SR. INV KELLY: Okay. And so, your parents, it's your parents' home at [REDACTED] Bridgeview Drive. Am I correct that your father has gifted the property to your brother Peter?

LOUIE: I don't know if he did or not.

SR. INV KELLY: Okay.

LOUIE: They don't talk to me about property matters. I just know that I don't get a penny from my family, that's all I know.

SR. INV KELLY: Okay. And was there, I think you mentioned a brief time, but since you got out of the Army, and then you lived in Sacramento, and then you moved back to San Francisco, when did you live at [REDACTED] Bridgeview Drive?

LOUIE: In-between. Like when I first came back, I lived there for a couple of weeks until I found a house. I mean not a house, but an apartment close by, a couple of blocks away, and then yeah, then I moved. So that house, after the rainy season, there was mold all over, so I had to

move to another place, which is another few blocks away, and then...yeah. Then in-between, I moved back to my parents' house when I had to move to another place.

SR. INV KELLY: Okay. And what is the longest, continuous stretch of time that you lived at [REDACTED] Bridgeview Drive that you can recall?

LOUIE: Since 2012?

SR. INV KELLY: Yes.

ATTY LINNENBACH: Don't guess.

SR. INV KELLY: Well, I'm entitled to her best estimate.

ATTY LINNENBACH: That's what I mean, I want her to qualify her answer. If you're guessing, tell them you're guessing.

ATTY CHUNG: If you know.

ATTY LINNENBACH: If you know.

LOUIE: Yeah, probably the most recent move from January '22 to end of February, like the beginning of March, or like around March 2022, so about two months is the longest I've stayed there.

SR. INV KELLY: And that was in this calendar year 2022?

LOUIE: Yes, yes in this year.

SR. INV KELLY: Okay. So in the ten years between 2012 and 2022, what's the longest period of time you've ever lived in one place in those years? I'm not phrasing that exactly the way I want to. What place did you live in the longest?

LOUIE: Uh, boy. Probably [REDACTED] Palou Avenue, which is a couple of blocks from my parents' house.

SR. INV KELLY: Okay. And about how long do you think that was?

LOUIE: Let's see, five years.

SR. INV KELLY: Okay.

DCA STEWART: Can you spell that name of the street?

LOUIE: P-a-l-o-u.

SR. INV KELLY: P-a-l-o-u, and since you've returned to San Francisco in 2012, have you always voted at [REDACTED] Bridgeview Drive?

LOUIE: Yes, I have.

SR. INV KELLY: Okay.

LOUIE: Because I always lived like within blocks of it. It would be the same precinct anyways.

SR. INV KELLY: But did you have that address as your voting address when you lived those five years at Palou Avenue?

LOUIE: Yes, it's literally a couple of blocks away. It would be the same precinct.

SR. INV KELLY: Okay. So let's go back over this last, more or less, year. So on April 2, 2021, you purchased the property at [REDACTED] Ramsell. Right?

LOUIE: Uh-huh.

ATTY CHUNG: Again, Leanna, yes or no.

LOUIE: Yes, sorry.

SR. INV KELLY: And, I'm unclear about this, have you ever lived at [REDACTED] Ramsell Avenue?

LOUIE: No, my son has.

SR. INV KELLY: Okay, your son has lived there. Has your fiancé ever lived at [REDACTED] Ramsell Avenue?

LOUIE: Just when he wants to. He goes wherever he wants, not like a continuous period, but yes, he has.

SR. INV KELLY: He has lived there overnight?

LOUIE: Yes.

SR. INV KELLY: Okay. And where does he otherwise live?

LOUIE: At [REDACTED] 23rd Street.

SR. INV KELLY: And is that an apartment or a house?

LOUIE: That's a house.

SR. INV KELLY: Okay. So, you lived for a time in 2021, at [REDACTED] 22nd Avenue. Right?

LOUIE: Say again.

SR. INV KELLY: [REDACTED] 22nd Avenue.

LOUIE: Yes.

SR. INV KELLY: So you lived there for a period of time last year?

LOUIE: A few months, yeah.

SR. INV KELLY: Okay. And when did you move in there?

LOUIE: Around mid-August '21.

SR. INV KELLY: Okay. And why did you move there?

LOUIE: Because school was about to start and my son wanted to walk to school, and it was like a mile-and-a-half from Washington High School, which is easily walkable.

SR. INV KELLY: Okay. And that's your 16-year-old now.

LOUIE: Right.

SR. INV KELLY: Who would have been about 15 then.

LOUIE: 15, yeah.

SR. INV KELLY: Okay. And can you describe to me [REDACTED] 22nd Avenue? Is it a fully detached home, semi-detached or fully attached home? Meaning bordered on two sides by a house.

LOUIE: It was bordered on two sides by other houses.

SR. INV KELLY: Okay. And how many bedrooms?

LOUIE: Upstairs there was one, two three, there was four bedrooms and we had roommates in the other rooms; we rented one of the rooms.

SR. INV KELLY: Okay. How many bathrooms?

LOUIE: Two bathrooms upstairs. I don't know about downstairs.

SR. INV KELLY: Okay. Kitchen?

LOUIE: There's a kitchen.

SR. INV KELLY: Dining room?

LOUIE: Yeah, a very small dining room.

SR. INV KELLY: Did it have a dishwasher?

LOUIE: If it did, it never worked.

SR. INV KELLY: Okay.

LOUIE: We always washed the dishes by hand, that's how I remember.

SR. INV KELLY: Okay. Did it have a washer-dryer?

ATTY LINNENBACH: What's the relevance of this?

SR. INV KELLY: The relevance of this is that Ms. Louie has made a point of talking about having lived in District 4 prior to her current location in District 4, and I'm asking questions that are testing her knowledge of the property.

ATTY LINNENBACH: Okay.

LOUIE: That's fine. Yeah, there was a washer and dryer downstairs.

SR. INV KELLY: Okay.

LOUIE: Right next to the mail slot.

SR. INV KELLY: And was it furnished or unfurnished?

LOUIE: Our room was unfurnished so yeah, we had to move furniture in there, but the rest of the house was furnished.

SR. INV KELLY: And did you have access to the use of the entire house?

LOUIE: I mean not the other people's rooms, but I did have access to the kitchen and the dining room and the washer and dryer.

SR. INV KELLY: And the living room?

LOUIE: There wasn't a living room.

SR. INV KELLY: Okay. Who owns [REDACTED] 22nd Avenue?

LOUIE: A lady by the name of Anna Hong, no relation to my kids or me.

SR. INV KELLY: Okay. And did she live there at the same time you lived there?

LOUIE: No. She lives a few blocks away.

SR. INV KELLY: And you referred to other roommates, who were they?

LOUIE: I don't know their last names, but I know one of them is Eric, one of them is Ryan, and they're all Caucasian Americans.

SR. INV KELLY: Okay. And how did you come to live at the 22nd Avenue address?

LOUIE: I was looking for a place. I asked my friends, and my friends told my friends, and my friends told my other friends, and Anna sent me a message. She said, "Hey, I have a place for rent. If you want to look at it, come check it out," so I went to check it out.

SR. INV KELLY: So you and your roommates each were separately contracting with Anna as tenants of hers in this establishment?

LOUIE: Yeah. I have no idea when they moved in or when they moved out.

SR. INV KELLY: Okay. And how much did you pay for rent?

LOUIE: About \$1,000 a month.

SR. INV KELLY: Okay. And did you have a lease agreement or a month-to-month rental agreement?

LOUIE: Yes, I did.

SR. INV KELLY: Which did you have, a lease agreement or a month-to-month?

LOUIE: I don't remember. I can send you a copy if you need.

SR. INV KELLY: Okay. And what does moving in entail for you or what did it entail for you on 22nd Avenue? Did you move in furniture?

LOUIE: Yes, I did. I moved a bed in there and a couch in there, yeah, and like some other little knickknacks.

SR. INV KELLY: And clothes, I take it?

LOUIE: Yeah. I mean she provided a closet, so I didn't have to buy that, yeah. I moved in clothes and stuff that I need. She actually was very sweet. She gave me a rice cooker for a housewarming and yeah, little stuff like that.

SR. INV KELLY: Okay. And did you bring business materials, file cabinets?

LOUIE: No.

SR. INV KELLY: Computer?

LOUIE: No, I didn't do my business there.

SR. INV KELLY: Where did you do your business?

LOUIE: I have an office at my fiancé's house.

SR. INV KELLY: And what does that—that's at [REDACTED] 23rd Street?

LOUIE: Uh-huh.

SR. INV KELLY: That's where you maintain an office for the work you do for your company?

LOUIE: Yeah.

SR. INV KELLY: Okay. And when did you become engaged to your fiancé?

LOUIE: Around my birthday this year.

SR. INV KELLY: So that's February.

LOUIE: 2022.

SR. INV KELLY: When do you celebrate your birthday in ordinary years? On March 1st or on February 28th?

LOUIE: 28th, yeah. February 28th, yeah.

SR. INV KELLY: So you moved in February 28th or you became fiancée with him on February 28th or so of this year.

LOUIE: Right, but not move-in, we just, we're engaged.

SR. INV KELLY: Okay. And when did you begin using his apartment for your office?

LOUIE: A while ago.

SR. INV KELLY: Or his house.

LOUIE: I'd say I used his office about, I'm trying to think, around sometime in 2019, I don't remember.

SR. INV KELLY: Okay.

LOUIE: Like maybe October 2019, yeah. He has quite a few bedrooms, so he said you can set up your Wi-Fi here.

SR. INV KELLY: Okay.

ATTY CHUNG: So we've been going about an hour now, should we take like a five-minute break?

LOUIE: I do need to use the restroom

DCA STEWART: Yeah, absolutely.

SR. INV KELLY: Okay. Absolutely.

ATTY CHUNG: Okay.

DCA STEWART: And feel free, if you're warm, you can take your coat and your scarf off.

LOUIE: Thank you.

SR. INV KELLY: It's four o'clock, and so we'll pause.

(A brief break is taken.)

SR. INV KELLY: Okay. We're back on the record. It's now 4:17 on the same day, 22nd August. I forget exactly where we were in our process, but I want to backtrack anyway and ask you a couple of questions.

ATTY LINNENBACH: Okay.

SR. INV KELLY: Your attorney, Ms. Linnenbach has asked me to ask you again about your income. So, what do you have to add to that?

LOUIE: Okay. So I told you that I have a VA income, right, and my GLIM product. I worked a little bit for the Recall Chesa campaign, so the last...

SR. INV KELLY: You are a paid staff member for the Recall Chesa campaign, that's spelled C-h-e-s-a.

LOUIE: Yes.

SR. INV KELLY: Okay.

LOUIE: I was a volunteer for a long time and I was paid for certain months of the recall.

ATTY LINNENBACH: And tell them what months you were paid.

LOUIE: I was paid March, April, May hourly for those three months, and actually prior to that, I was getting a stipend of about 1,000, about 1500 a month.

SR. INV KELLY: Okay.

ATTY LINNENBACH: Thank you.

SR. INV KELLY: Thanks. And I wanted to, I'm pretty sure I asked you this question, and lawyers hate when you ask it again, but it's only because I want to make sure that I got it right. You, yourself never lived at Mansell, or Ramsell Avenue.

LOUIE: No, I've never lived at Ramsell.

SR. INV KELLY: And you said that your fiancé has only lived there whenever he wants or off and on. Is that correct?

LOUIE: Yes.

SR. INV KELLY: And then, when you moved—I believe we were talking about 22nd Avenue, and when did you leave 22nd Avenue?

LOUIE: End of December of '21.

SR. INV KELLY: Okay. And you moved to Bridgeview.

LOUIE: Yes.

SR. INV KELLY: So can you tell me a little bit more about Bridgeview? Like you said your father lives there, your brother and his wife and children live there.

ATTY LINNENBACH: Wait. I'm sorry, just go back. So the Ramsell address, who else, can you ask her the complete answer, can you ask her who lives in the Ramsell address?

SR. INV KELLY: I think that she told me, but who does live in the Ramsell address?

LOUIE: My older son Wayan, my younger son [REDACTED], and my fiancé whenever he wants.

SR. INV KELLY: Okay.

LOUIE: My two sons live there pretty much full-time, and my older son goes to Sacramento on the weekends where he does drill.

SR. INV KELLY: So your younger son [REDACTED] when you lived on 22nd Avenue, [REDACTED] was going to Washington High School. Is that right?

LOUIE: Yes, he stayed with me.

SR. INV KELLY: And where does he go to school now?

LOUIE: He still goes to Washington High School.

SR. INV KELLY: Even though Ramsell is in the Ingleside?

LOUIE: Uh-huh, it's just one bus ride away from the school he says.

SR. INV KELLY: Okay. And so, his adult supervision at Ramsell is his brother and?

LOUIE: And my fiancé, yeah.

SR. INV KELLY: Your fiancé, whenever he's there.

LOUIE: Yeah. And I go check on him often.

SR. INV KELLY: Okay.

DCA STEWART: Do you ever sleep there?

LOUIE: No, I don't.

DCA STEWART: And why not?

LOUIE: Because I live in D4.

DCA STEWART: So you don't have a bedroom at Ramsell?

LOUIE: No, I don't.

DCA STEWART: Does your fiancé?

LOUIE: Yes, he does.

SR. INV KELLY: Have you ever lived with your fiancé at his house at [REDACTED] 23rd Street?

LOUIE: Only for weekend visits.

SR. INV KELLY: Okay. And do you have a key?

LOUIE: Yes, I do.

SR. INV KELLY: Okay. And I take it you can, because all of your business materials are located there, you need to have easy access to that space. Is that right?

LOUIE: Yes, sir.

SR. INV KELLY: Okay. And when you moved to [REDACTED] Bridgeview, did your son [REDACTED] move with you into [REDACTED] Bridgeview?

LOUIE: Yes, he did.

SR. INV KELLY: So how many people were living there? How many bedrooms are at [REDACTED] Bridgeview?

LOUIE: Upstairs is two bedrooms, downstairs is three bedrooms.

SR. INV KELLY: Okay. And does it have a kitchen?

LOUIE: Yes.

SR. INV KELLY: Dining room?

LOUIE: Yes and a living room, yes.

SR. INV KELLY: And a living room. Any sort of additional, like in-law unit built into the place?

LOUIE: Yes, downstairs there's three bedrooms.

SR. INV KELLY: So is downstairs a ground level entrance?

LOUIE: Yes, yeah, street level.

SR. INV KELLY: Street level entrance, but we're not talking about a basement for the ground level?

LOUIE: No basement.

SR. INV KELLY: Okay.

LOUIE: No basement.

SR. INV KELLY: So three bedrooms on the ground floor and then two.

LOUIE: On the second floor.

SR. INV KELLY: On the second floor, and that's the extent of the house at Bridgeview?

LOUIE: Uh-huh.

DCA STEWART: Are they separate though? You suggested that the downstairs was an in-law, I thought.

LOUIE: No, no, it's all one house. You go in the first floor, it's three bedrooms and the sitting room. You go up the stairs and there's two bedrooms, and then the kitchen, and the living room, and dining room is up there.

SR. INV KELLY: Okay. And so, when you lived there from the end of December until March of this year, did [REDACTED] have his own room there?

LOUIE: We share rooms.

SR. INV KELLY: You and [REDACTED]?

LOUIE: We share rooms, yes.

SR. INV KELLY: You share a room, okay.

DCA STEWART: Sorry, it wasn't clear to me. When you say, "We share rooms," do you mean I share a room with [REDACTED] or the whole family, we just share rooms?

LOUIE: Well, I share a room with [REDACTED], my father shares a room with my nephew, my brother and his wife share a room, and my niece has her own room.

DCA STEWART: Thank you for clarifying.

SR. INV KELLY: Okay. And then, when you lived on 22nd Avenue, did you and [REDACTED] share the same room?

LOUIE: Yes, we did.

SR. INV KELLY: Okay. And you did not change your voter registration to 22nd Avenue, did you?

LOUIE: No, I did not.

SR. INV KELLY: And why did you not do that?

LOUIE: I don't recall there being an election that year.

SR. INV KELLY: Okay.

LOUIE: I don't think there was an election that year. Was there?

SR. INV KELLY: I don't know how to answer your question, I don't know. So the reason would be you would not have changed your voter registration.

LOUIE: There's no voting.

SR. INV KELLY: If there's no voting going on. Okay. And you provided us with, and you've provided again today, but you had previously provided the Chase bank statement that was registered at 22nd Avenue, from February to March. Right?

ATTY CHUNG: I don't think that's the 22nd Avenue.

LOUIE: There was one. I have not changed the address back to [REDACTED] Bridgeview Drive on that one yet, because when you go online to login, they always ask for your zip code. If I keep changing zip codes back and forth, it will log me out.

SR. INV KELLY: Okay. So here, so that we're not confused about this.

LOUIE: Yeah.

SR. INV KELLY: This is a statement that you provided either to us or to the Department of Elections from February 17th through March 16th of 2022, and the address is [REDACTED] 22nd Avenue. And that's correct. Right?

LOUIE: That's correct.

SR. INV KELLY: And if you look at the second page, you'll see that there's also one of the accounts is a premier plus checking, and the signatories, or the names on that account are you and your older son Wayan. Right?

LOUIE: Uh-huh.

SR. INV KELLY: So that's a joint account that you maintain with your older son?

LOUIE: Uh-huh.

SR. INV KELLY: Is that a yes?

LOUIE: Yes.

SR. INV KELLY: Okay. All right. So, when did your son [REDACTED] move into the [REDACTED] Ramsell Avenue address?

LOUIE: When we moved out of [REDACTED] Bridgeview Drive.

SR. INV KELLY: So that's in March of this year?

LOUIE: Yes.

SR. INV KELLY: Okay.

DCA STEWART: I just wanted to clarify because I thought that in March of this year, you were still in transition?

LOUIE: Yes.

DCA STEWART: But your son moved in March of 2022 to the Ramsell address.

LOUIE: Yes, because it was already ready.

DCA STEWART: It was ready.

LOUIE: Yeah.

SR. INV KELLY: I believe, am I not correct that for Ramsell, you purchased that on April 1st of 2021?

LOUIE: Around that time, yes.

ATTY LINNENBACH: Maybe you should ask, and I don't mean to guide your investigation, what was the condition of the Ramsell house when she purchased it?

SR. INV KELLY: Well, what was the condition?

LOUIE: It was a fixer.

SR. INV KELLY: Okay.

LOUIE: It required a lot of work.

SR. INV KELLY: The deed shows that you purchased it on April 1, 2021.

LOUIE: Okay.

SR. INV KELLY: So was it at all habitable?

LOUIE: No, absolutely not.

SR. INV KELLY: When did it become habitable for your 16-year-old son?

LOUIE: This year. This year, '22.

SR. INV KELLY: Okay. So it was after a year after you purchased the property that your son moved in there.

LOUIE: Yes.

SR. INV KELLY: After having worked on the property to fix it up.

LOUIE: Yes.

SR. INV KELLY: Okay. So, we know that you signed your rental agreement. Let me back up here, I'm sorry. So voting records show that you voted at [REDACTED] Bridgeview Avenue on February 2nd for the February 15, 2022, election.

LOUIE: Yep.

SR. INV KELLY: And this is a copy of your mail-in ballot. So, you've dated this February 2, 2022, and you filled this all out, did you not?

LOUIE: Yes, I did.

SR. INV KELLY: Okay. And you had written there, "New Address," and are those your initials above new address?

LOUIE: Yes.

SR. INV KELLY: To indicate, that you struck through that, and then you've pasted over the address section a mailing label, Return Address for [REDACTED] Bridgeview Drive. Correct?

LOUIE: Yes.

SR. INV KELLY: And the continuation of what you had written in there for the new address is something Street with your initials. What was that new address that you had written in and then put the sticker over?

LOUIE: [REDACTED] because I was moving out of there at the time.

SR. INV KELLY: Let's now back up. You lived at [REDACTED] 22nd Avenue. Is that correct?

LOUIE: Uh-huh.

SR. INV KELLY: And you moved out in December of 2021. Is that right?

LOUIE: Uh-huh.

SR. INV KELLY: Yes?

LOUIE: Yes, sorry.

SR. INV KELLY: And this election was some five or six weeks later perhaps, four or five weeks later.

LOUIE: Yes.

SR. INV KELLY: On February 2nd, when you voted at Bridgeview.

LOUIE: Yes.

SR. INV KELLY: And this new address that you were writing in there, you wrote Street, not Avenue.

LOUIE: Yes.

SR. INV KELLY: And you claim that you wrote-in new address, [REDACTED] 22nd Avenue?

ATTY LINNENBACH: I'm confused because I've never seen this document before. Can I just ask a question?

SR. INV KELLY: Okay.

ATTY LINNENBACH: Did you mean that you were, did you vote from this address?

LOUIE: Yes.

ATTY LINNENBACH: So you actually voted from [REDACTED] Bridgeview.

LOUIE: Yes.

ATTY LINNENBACH: And so, did you actually cross out this new address and did you actually mean that you were voting from [REDACTED] Bridgeview Drive?

LOUIE: Yes, I was voting from [REDACTED] Bridgeview Drive.

ATTY LINNENBACH: And that precinct, [REDACTED], is that address, which I've circled here, and I guess we can mark this, is that precinct...

LOUIE: [REDACTED] Bridgeview Drive.

ATTY LINNENBACH: Is that the [REDACTED] Bridgeview Drive? So did you mean that you were not at this address, but you were at the [REDACTED] Bridgeview Drive address?

LOUIE: Yes.

ATTY LINNENBACH: Okay.

SR. INV KELLY: Okay. So you've asked your questions, but I'd still like an answer to my question. What is that new address that you wrote in there and then pasted that label over?

ATTY CHUNG: If you remember.

LOUIE: Yeah, I don't remember.

SR. INV KELLY: Can you think of any address that ends in Street.

ATTY CHUNG: Don't speculate.

SR. INV KELLY: That you considered yourself to be having as an address.

ATTY CHUNG: Only answer if you know what you put there.

LOUIE: I might have, I'm not sure. I might have put [REDACTED] Ramsell, but I had not moved in there yet and that's why I crossed it out.

SR. INV KELLY: Is it possible that you wrote down [REDACTED] 23rd Street?

LOUIE: It might be possible, I don't know.

SR. INV KELLY: Okay.

DCA STEWART: At that point in time, had you ever spent the night at Ramsell? Was it habitable as of February 2022?

LOUIE: No.

DCA STEWART: So you had not yet spent the night there.

LOUIE: No.

DCA STEWART: Had you ever spent the night at your fiancé's house?

LOUIE: I have, I've said that before.

SR. INV KELLY: Okay. So when you received this ballot at ■ Bridgeview that you used to vote in the February 15 election, you were living at ■ Bridgeview. Is that right?

LOUIE: Yes.

SR. INV KELLY: Okay. And then you've sent us in advance, and you've again copied us here today, the rental agreement that you have with George Erickson for 35th Avenue, ■ 35th Avenue. Yes?

LOUIE: Uh-huh, yes.

SR. INV KELLY: How did you come to live there?

LOUIE: A mutual friend introduced us

SR. INV KELLY: When?

LOUIE: Sometime in February.

SR. INV KELLY: And how did the subject of renting a room from Mr. Erickson come up?

LOUIE: I wanted to move to Sunset for a while now, so I unsuccessfully moved in the first time and we had that mold problem, so we had to move out, but I still wanted to live in Sunset. So, when my mutual friend had introduced us, George was, he was really happy. He said I've been living here by myself for a long time, it'd be great to have a roommate.

SR. INV KELLY: Okay. And So the terms of your rental is month-to-month, \$500 a month. Is that right?

LOUIE: Yes.

SR. INV KELLY: Okay. And you've given us the George Erickson letter. So you and he both inhabit the 35th Avenue address as roommates, is that right?

LOUIE: Yes. I was also doing a lot of work in the Sunset area, so this works out for me.

SR. INV KELLY: Okay.

DCA STEWART: What kind of work were you doing there?

LOUIE: Primarily those few months for the Recall campaign, I was in charge of doing visibility at the corners of Sunset Boulevard, Ortega, 19th Avenue. I was in charge of all that area and Sunset doing visibility.

DCA STEWART: What is, I don't know what visibility means.

LOUIE: Basically go to street corners and hold up signs for Recall Chesa.

DCA STEWART: So having a presence at the corners?

LOUIE: Right.

DCA STEWART: Okay.

LOUIE: My assignments were all in Sunset.

ATTY LINNENBACH: Prior to you entering the room, a question was answered about income and that answer was augmented that Ms. Louie is the campaign outreach coordinator for District 4 for the Sunset District for Chesa Boudin's recall. So, because she is an activist against violence and against the AAPI community, that's why she was in District 4 for April, May, June, and you were out of the room for that.

DCA STEWART: Thank you. I was really trying to get at the type of or the actual day-to-day.

ATTY LINNENBACH: So visibility is holding up signs. Sorry.

DCA STEWART: We just want to make sure that we get her answer and not yours.

ATTY LINNENBACH: Okay. Tell them what visibility is.

SR. INV KELLY: Okay.

DCA STEWART: No, I was just curious if that was the...you said you were very busy during that time and doing a lot of work there, and you said you were in charge of visibility. So was that your primary responsibility or did you have other responsibilities for the campaign?

LOUIE: That was my primary responsibility for the campaign.

DCA STEWART: Thank you.

SR. INV KELLY: So you provided us with photographs of your housewarming party, but can you describe the place, [REDACTED] 35th Avenue?

LOUIE: Uh-huh, starting from the ground level up?

SR. INV KELLY: Sure.

LOUIE: Okay. The ground level is garage and a one-bedroom suite, it has a built-in bathroom. When you go up the stairs, there's a kitchen, living room, dining room, and a bedroom, and the office.

SR. INV KELLY: Okay. And do you occupy the one-bedroom suite on the garage level or?

LOUIE: Yes.

SR. INV KELLY: You do. So the bedroom upstairs is occupied by Mr. Erickson?

LOUIE: Yes.

SR. INV KELLY: Okay. And how many bathrooms?

LOUIE: There's one upstairs and one downstairs.

SR. INV KELLY: Okay. And does it have a dishwasher?

LOUIE: Yes, it does.

SR. INV KELLY: Washer-dryer?

LOUIE: Yes, it does.

SR. INV KELLY: Okay. And did it come furnished or unfurnished?

LOUIE: Well upstairs, he was fully furnished. My bedroom, he provided me with a couch.

SR. INV KELLY: Okay.

LOUIE: And there was a built-in closet, and the bathroom, and I purchased the bed, the dresser. Actually, the dresser's an old dresser that I moved from my father's house, and I bought a few other things for the house.

SR. INV KELLY: Okay. And what did it entail for you to move in there? So you described the purchase of the new mattress that arrived and you gave the specific dates, and I don't want to misquote you here.

DCA STEWART: March 23rd.

SR. INV KELLY: March 23rd. So, did you not sleep there from March 1st to March 23rd?

LOUIE: I tried on and off on the couch. It was not very comfortable, so yeah, and I was waiting for my paycheck to come. So when my paycheck finally came, I purchased the bed.

SR. INV KELLY: So did you live off and on at Bridgeview?

LOUIE: Yes.

SR. INV KELLY: Between March 1st and March 24th, when your bed was delivered to 35th Avenue?

LOUIE: Yes.

SR. INV KELLY: Okay. So in the statement that your landlord/roommate made, he said that you had lived there continuously since, except for a short...well, "I, George Erickson, hereby attest that my tenant, Leanna Louie, moved into [REDACTED] 35th Avenue on March 1, 2022. Leanna has continuously lived here, except for a short vacation in SoCal and Las Vegas in the last week of April 2022." So can you tell me how you square that statement with the fact that you were really only intermittently there the first three-plus weeks of March?

ATTY CHUNG: Just one moment. Are you asking her to explain why her landlord wrote this?

LOUIE: I can explain.

ATTY CHUNG: No, no, no. Are you asking her to explain why her landlord wrote this?

SR. INV KELLY: What I'm asking her to explain why the discrepancy between what her landlord wrote and what she has told us were her actual living circumstances for the first three weeks.

ATTY CHUNG: So she can explain things that she did or that she is aware of, but she should not be explaining her landlord's sentences. That's for you to have a discussion with him about.

SR. INV KELLY: Okay. What can you tell me to enlighten me about your behavior the first three weeks of March 2022, when it comes to living in 35th Avenue?

ATTY LINNENBACH: Well, she said the mattress arrived the first, on the 24th. She hasn't told you when she completed the move, so can you not keep trying to lock her into that.

LOUIE: Sorry, guys. This is very easy explained.

SR. INV KELLY: Please do.

LOUIE: George has another home in San Rafael where his wife lives. They're temporary separated, he spends three or four days in San Raphael and three or four days in San Francisco whenever he wants. So we don't always see each other, and to his knowledge, he sees me—it just so happens that we see each other often. Right? So he thinks that I'm continuously here because he sees me on the news, he sees me dah, dah, dah, and he texts me every day, "Hey, I saw you on the news. You're on the corner of 19th Avenue and you know, Lincoln." So he sees me as somebody continuously staying here.

SR. INV KELLY: Okay, so let me break it down.

LOUIE: But he doesn't spend every night at this address.

SR. INV KELLY: Okay.

LOUIE: He does go back home to see his wife.

SR. INV KELLY: Okay.

LOUIE: Three of four days a week, however he does it. And this week, he's actually in Atlanta, so he hasn't seen me all week this week.

SR. INV KELLY: Okay. So between March 1st and March 24 when your mattress arrived, how many times did you sleep on the sofa that he provided you?

LOUIE: I don't remember, I haven't been counting.

SR. INV KELLY: Did you ever sleep there seven days a week?

LOUIE: No.

SR. INV KELLY: Okay. Did you sleep there the majority of the time?

LOUIE: No, maybe two to three days a week.

SR. INV KELLY: Okay.

DCA STEWART: Did it depend on sort of how late you were out working?

LOUIE: Absolutely.

DCA STEWART: Yeah.

LOUIE: There are nights that I work until two a.m. and he was so bothered by it.

DCA STEWART: George was?

LOUIE: Yes.

DCA STEWART: Because you would be loud when you came home?

LOUIE: Yeah. To him, everything is loud—he has super-sensitive hearing.

DCA STEWART: So, I'm sorry, I was assuming that you would have slept there on the nights when you were working late, but maybe on the nights you were working late you would go elsewhere, so as not to bother him. Which one was it?

LOUIE: Yeah, sometimes I have to process paperwork, you know. So the Recall campaign office is on 301 Gough. So, if I worked too late on the east side, I'd stay at my father's house, and if I was doing campaign on the west side, then I'd stay in Sunset, so I was kind of in-between both places.

SR. INV KELLY: And again, did you occasionally, during this time period, stay at your fiancé's house on 23rd Street?

LOUIE: Maybe once a week or so, I haven't been counting.

SR. INV KELLY: Okay. So, you were registered to vote. On March 8th, you registered to vote at [REDACTED] 35th Avenue.

LOUIE: Yes.

SR. INV KELLY: Is that right?

LOUIE: Yes.

SR. INV KELLY: Okay.

ATTY LINNENBACH: Well, to be clear, she filed an application to register online.

SR. INV KELLY: Okay. And then you did vote there on April 3rd, is that right? This is an image of your ballot.

ATTY LINNENBACH: And when you say there, you're meaning [REDACTED] Bridgeview?

LOUIE: Bridgeview.

SR. INV KELLY: Yes.

LOUIE: So I never got the confirmation that I was actually registered at the new address.

DCA STEWART: Can I just clear up the record, because I got a little confused, Shawn. So you applied to register to vote online at 35th Avenue.

LOUIE: Uh-huh.

DCA STEWART: But then you voted at Bridgeview on April...

LOUIE: They sent this to me.

DCA STEWART: No, I understand, I just wanted to make it clear because when he said there, I got a little confused.

ATTY LINNENBACH: Here, there, and everywhere.

SR. INV KELLY: Did you receive a ballot for the April election at [REDACTED] 35th Avenue?

LOUIE: No.

SR. INV KELLY: You never received a ballot there after you had registered on March 8th?

LOUIE: No.

SR. INV KELLY: Okay. So the ballot that you received was at [REDACTED] Bridgeview, where you were still living off and on after March 8th. Is that right?

LOUIE: Yes.

SR. INV KELLY: Okay. How did you become aware that this had been delivered to Bridgeview?

LOUIE: My father picks up the mail every day. He says, "Honey, you got a voter ballot, you better vote," so I voted.

SR. INV KELLY: So did you go by [REDACTED] Bridgeview and collect the ballot that had been mailed there?

LOUIE: I was staying there that day when he gave it to me.

SR. INV KELLY: On April 3rd?

LOUIE: Yes.

SR. INV KELLY: Okay. So this is your signature, that's your writing, you wrote in April 3, 2022, and the address at [REDACTED] Bridgeway. Right?

LOUIE: Yes.

SR. INV KELLY: Okay. And do you acknowledge that above your signature and above the section where it says, "Sign Here," it says, "I declare under penalty of perjury that I am a resident of the San Francisco precinct where I am voting"?

LOUIE: Yes.

SR. INV KELLY: Okay.

LOUIE: I was staying there at the time.

SR. INV KELLY: And so you considered yourself to be a resident as of April 3, 2022, at ■ Bridgeview Drive?

LOUIE: Yes.

SR. INV KELLY: Okay.

ATTY LINNENBACH: Can I ask you one quick clarification? Do you understand what the legal definition of resident is based on what they wrote on that envelope?

LOUIE: Sorry?

ATTY LINNENBACH: I think I proved my point.

DCA STEWART: Well, why don't you tell us what you thought it meant when you said I declare under penalty of perjury that I'm a resident of this San Francisco precinct.

LOUIE: That I stay there, that I sleep there, that I do my business there, eat there, share meals with my family.

DCA STEWART: Okay, thank you.

SR. INV KELLY: And you were working for the Recall Chesa Boudin campaign. Correct?

LOUIE: Yes.

SR. INV KELLY: And the ballot that you mailed in for this election on April 3, 2022, from Bridgeview Drive, allowed you to vote in the Matt Haney and David Campos election. Is that right?

LOUIE: Yes.

SR. INV KELLY: And did you understand when you voted from Bridgeview Drive that if you had voted from 35th Avenue address, that you would not be able to vote in that portion of the election, the election between Matt Haney and David Campos?

LOUIE: I had no idea. So the 25th [sic] Avenue address, there was no ballot sent there because there was no election on that side of town.

SR. INV KELLY: Okay, there was no election whatsoever, it was just the east side election.

LOUIE: Right.

SR. INV KELLY: So even though you had registered on March 8th over in District 4, you voted with the ballot that you received at Bridgeview.

LOUIE: Right, because I never got confirmation from my west side address with the voter—they're supposed to send me a confirmation.

SR. INV KELLY: Okay.

LOUIE: But instead of getting a confirmation, I got this.

ATTY LINNENBACH: If you look on one of the emails that we gave you, it says, "You will receive a confirmation of your voting," with a little by mail, and I believe that you will see that she didn't receive that. So when she received this ballot, she thought it hadn't been processed and that she had a legal right to vote because the government sent this to her.

SR. INV KELLY: Thank you for your testimony, but...

ATTY LINNENBACH: I'm just trying to...

LOUIE: But exactly.

SR. INV KELLY: Yeah. So later on, when you wanted to clarify in May that you wanted a ballot registered to your District 4 address, right, you went to the Department of Elections and you said give me a ballot for my new address.

LOUIE: Yes.

SR. INV KELLY: Why didn't you do that for this election?

ATTY LINNENBACH: I'm sorry, vague as to this election?

SR. INV KELLY: The election we're discussing of April 15th. Why did you not take that ballot down to the Department of Elections and say I've changed my address?

LOUIE: Because when I got this ballot, I was still at my father's house, so I thought I should go ahead and vote since I'm still here and I'm still trying to move, and I didn't think anything of it. I didn't even know that once I turned that this in that they would automatically process to this address in future elections. I had no idea that was going to happen.

SR. INV KELLY: Right, but your bed was delivered to your new home on March 24th. Right?

LOUIE: Yes.

SR. INV KELLY: And so this is now over a week later you're voting from your old home. So, what was left to transition to move you into your new home on April 3rd?

LOUIE: There's a lot of stuff, kitchen items, stuff that I cook with, my clothes, my folding chairs. You know, a lot of items that I still had not moved yet.

SR. INV KELLY: And so, you posted this on Twitter I believe. Is that correct, accurate?

LOUIE: Yeah. That was just during—it's like a PSA.

SR. INV KELLY: That you...

ATTY LINNENBACH: Can you explain what PSA is?

LOUIE: It's a Public Service Announcement basically, basically that I said, uh, look, Department of Elections shared it, they posted on that day. It was the day of the election, I saw it somewhere. I saw it at the website, so I just shared it.

ATTY LINNENBACH: Is that part of your job with visibility and outreach?

SR. INV KELLY: Please, please quit interrupting me.

ATTY LINNENBACH: I'm sorry.

SR. INV KELLY: And quit, please quit interjecting your line of questioning. It's confusing me and it's unhelpful. So, Ms. Louie, this is something you posted on Twitter on April 19th. Is that right?

LOUIE: No, it's on Facebook.

ATTY CHUNG: Can we clarify what this is referring to?

SR. INV KELLY: We're looking at an image that was in an article from *Mission Local* that shows a photograph of a Twitter post from Leanna Louie and it's dated April 19th. Is that accurate? Is this your Twitter post?

LOUIE: It is not my Twitter post, that is *Mission Local's* Twitter post. This is my Facebook post on the bottom.

SR. INV KELLY: Okay, thank you.

LOUIE: You see that has my name on it? It says Leanna?

SR. INV KELLY: Yes, okay.

LOUIE: So somebody is following me, this is my Facebook post. It was a Public Service Announcement, it was the last time I voted on the eastside, but I didn't vote on that day. I shared that post on the 19th, but I voted clearly, on the 3rd of April.

SR. INV KELLY: And it was important for you as the outreach staff member for Recall Chesa Boudin to highlight that David Campos was the Chief of Staff for Chesa Boudin?

LOUIE: Yes, it was.

SR. INV KELLY: Okay. So you were saying go Matt Haney, versus David Campos. Right?

LOUIE: Yes.

SR. INV KELLY: Okay. Where did you sleep on the evening of April 3rd?

ATTY CHUNG: If you remember.

LOUIE: At my father's house.

SR. INV KELLY: Your father's house?

LOUIE: Yes.

SR. INV KELLY: And this was even after your new bed had been delivered to 35th Avenue?

LOUIE: Yes, that's normal for me. When I do work on the east side of town, I stay at my father's house.

SR. INV KELLY: Okay. So on April 3rd you have said that you considered the Bridgeview address to be your residence when you voted in that election. Is that right?

LOUIE: Yes, sir.

SR. INV KELLY: Okay. And what happened after April 3rd to make you consider [REDACTED] 35th Avenue to be your residence?

LOUIE: I spent the majority of my time working on the east side with the Recall campaign, so I spend pretty much all my nights at the west side address.

SR. INV KELLY: I'm sorry, I misunderstood what you just said. Did you say that you spent most of your time working on the east side?

LOUIE: On the west side of town.

SR. INV KELLY: On the west side, okay.

LOUIE: Yeah, after that.

SR. INV KELLY: Okay.

LOUIE: Because most of our visibility for Recall Chesa was on the west side.

SR. INV KELLY: And again, I apologize if I asked this before, but why did you not go to the Department of Elections and tell them that you had changed your registration out of that district?

LOUIE: Because I had faith that the Department of Elections figure, you know, where my voting place is, but I had no idea that we actually had to let them know again after we turn in the ballot that we're no longer living in a certain place.

SR. INV KELLY: Okay. So, I believe you may have explained this in your opening statement, but what prompted you to reregister online with CalVote on the date that the Elections Department has on record is on May 7th. You reregistered on your 35th Avenue address, what prompted that?

LOUIE: Well, on or around May 7th, my father said, "Hey, you got another vote by mail ballot at the house." So I said, "Really?" I said, "That's weird." I said, "I'll come over and pick it up," so I picked it up from my dad and I said, "Uh, my gosh, why did that happen?" So I said, "Well, let me reregister," so I reregistered at my Sunset address, and then I said, "Let me go on a

Monday and figure out why it sent it to this address,” because I thought that I had received my ballot previously in March because, you know, it had not registered yet. But I figured by this time, the Department of Elections would have already picked up and confirmed my registration, and I would automatically get the ballot for my new address for the June election, but I didn’t. I didn’t get one at my Sunset address. Instead, my father called me and said you got this ballot. So I said, uh, my gosh, I picked it up, I went home. I said well, let me reregister in case they’re going to send me another one.

SR. INV KELLY: So you reregistered online. Is that right?

LOUIE: Yeah, I reregistered online on the 7th, and then I waited until Monday, when the Department of Elections was open. I went there and I showed them the ballot. I said hey, what happened? Why did this happen? Because I registered back then, I figured maybe I got the ballot from last time because I didn’t register in time for you guys to change it, but by now, you guys should have it all straightened out. And one of the workers said that let me go check, so he checked. He said, “Uh, when you turned in your ballot, it automatically, when we take it in and scan it, it automatically reverts back to your old voting address. That’s why you got another ballot.” I said, uh, my gosh, I had no idea, and I said, “Am I going to be able to vote in my new address?” And he said, “Yes, all you have to do is register, confirm with me now, and then you can go outside and vote.” And so I confirmed with him and he said we did get your registration from online and I can confirm it now, and then you can vote right away, immediately in person.

SR. INV KELLY: And so he gave you a ballot to vote?

LOUIE: I have to go outside where the workers were working and I voted right out there. He said that that would cancel any ballot that I received over the mail.

SR. INV KELLY: Okay. And did you ever receive a ballot in the mail at the 35th Avenue address?

LOUIE: Yes, I did.

SR. INV KELLY: And what did you do with that?

LOUIE: Nothing, I just kept it.

SR. INV KELLY: Okay. So this is the ballot that you were issued when you went to the Department of Elections on May 9th?

LOUIE: Yes.

SR. INV KELLY: So you filled this out, you put May 9th, and you voted there that day.

LOUIE: Yes.

SR. INV KELLY: Okay, and handed it back in and said this is my completed ballot and here it is.

LOUIE: They had me drop it in the box.

SR. INV KELLY: Okay, great. So finally, you went to the Department of Elections and filed your Declaration of Candidacy. Right?

LOUIE: Yes.

ATTY LINNENBACH: (Sr. Inv Kelly hands paperwork to Atty Linnenbach.) Thank you very much.

SR. INV KELLY: Sure. And on this, you signed it, submitted it on June 3rd. Right?

LOUIE: Yes.

SR. INV KELLY: Of 2022.

LOUIE: Yeah.

SR. INV KELLY: And you also wrote on this declaration that your home address was [REDACTED] 35th Avenue.

LOUIE: Yes.

SR. INV KELLY: But your mailing address was [REDACTED] Bridgeview Drive.

LOUIE: Yes.

SR. INV KELLY: And why did you put in the additional mailing address?

LOUIE: It has been my mailing address since I was 16 years old. I wasn't going to change that.

SR. INV KELLY: Okay. You still continue to get most of your mail at Bridgeview Drive?

LOUIE: Some mail, like my veterans insurance policy. I'm going to keep paying that until I die, and I know my parents are always, well my father and my brother are always going to be there, so.

SR. INV KELLY: Okay. So you continue to get important business documents at your family home on Bridgeview Drive.

LOUIE: The only thing that I really get there is my veterans insurance policy, that's the only thing I really get there, and my driver's license.

SR. INV KELLY: Why did you tell the Department of Elections, why did you present them with an alternate address on your Declaration of Candidacy? If you get mail at 35th Avenue, why did you write down a separate mailing address?

LOUIE: Because I get mail at both addresses. Why is it relevant?

ATTY LINNENBACH: Did you understand that they were asking you where they should be sending you mail or were you just thinking in the grand scope of where else could somebody else possibly be sending you mail like the Veterans, so you just wrote that down?

LOUIE: Yeah, exactly what I explained. I've been getting mail there since I was 16 years old, and so my life insurance with the veterans, OSGLI, has been going there and I don't want that to change, and that's always been my mailing address for that.

DCA STEWART: And I'm sorry, why don't you want it to change?

LOUIE: Because I know there will always be somebody there. My parents will never sell that house, my brother will never sell that house. One of the Louies will be living there forever. I don't know where I'll be in 5, 10, 15 years from now. I could be moving in 10 years, but mail will always go here.

DCA STEWART: And I just have another question about, because by April 3rd, it sounds like your sons were living at Ramsell.

LOUIE: Yes.

DCA STEWART: So who was staying with them?

LOUIE: My older son is an adult, he's 28.

DCA STEWART: Right. And you said you check on your other son frequently. Right?

LOUIE: Yes.

DCA STEWART: How often is frequently?

LOUIE: About three or four times a week, sometimes more. He calls me every day.

DCA STEWART: So I'm just curious though, what does it mean to you to check on him?

LOUIE: Just make sure he has enough food in the refrigerator and stuff like that. He can cook, he can clean, he does his own laundry. Heck, he does my laundry some of the time.

DCA STEWART: But to you, is a check-in a phone call, a text, or is that a physical visit?

LOUIE: Sometimes call, sometimes text, sometimes I go and see him.

ATTY LINNENBACH: Who did you have dinner with last night?

LOUIE: Who I had dinner with last night? My son.

ATTY LINNENBACH: And who did you have dinner with the night before last night?

LOUIE: My son and we went out to a restaurant.

ATTY LINNENBACH: You see [REDACTED] almost every day. Isn't that correct?

LOUIE: Yes.

ATTY LINNENBACH: All right.

DCA STEWART: And so, where did you eat with your son last night?

LOUIE: At a restaurant in Sunset.

DCA STEWART: And the night before that?

LOUIE: At a restaurant in Sunset.

DCA STEWART: Do you ever eat with him at a home?

LOUIE: We rarely, I rarely have time to cook anymore.

SR. INV KELLY: How does he acquire his groceries at [REDACTED] Ramsell?

ATTY CHUNG: If you know.

LOUIE: Usually his brother will buy it. His older brother, his 28-year-old brother buys it.

SR. INV KELLY: Okay. And he's experienced in providing for his breakfast and whatever lunch he has. Does he get lunch at school?

LOUIE: He gets free lunch at school, yes.

SR. INV KELLY: But is he in school this summer?

LOUIE: No.

SR. INV KELLY: So does he provide for his own lunches as well?

LOUIE: Yeah. It's like I said, between me and my older son, we provide food in the refrigerator.

ATTY LINNENBACH: And you see [REDACTED] at your campaign office?

LOUIE: Yes. My son comes to volunteer at my office almost every day.

SR. INV KELLY: Where is your campaign office?

LOUIE: On 19th Avenue and Taraval.

SR. INV KELLY: When did you open your campaign office?

LOUIE: A few weeks ago. A few weeks ago, yeah.

SR. INV KELLY: Okay.

LOUIE: The first week of August.

ATTY LINNENBACH: And if you didn't hear from your son on a daily basis, you would be concerned. Correct?

LOUIE: Of course. I talk to him every day. One way or another, I talk to him every day.

DCA STEWART: But you said your fiancé has a bedroom at Ramsell. Correct?

LOUIE: Yes.

DCA STEWART: So how do you choose between Ramsell or Bridgeview when you're working late? How do you decide where you're going to go?

LOUIE: Since when?

DCA STEWART: I'm just curious what are the factors you consider, in terms of where you're going to sleep at night.

LOUIE: Well, Ramsell wasn't ready to be occupied until like after March.

DCA STEWART: Right. But you had said you were at your father's home at Bridgeview on April 3rd, the day that you voted there.

LOUIE: Yeah?

DCA STEWART: So I'm just curious how do you decide. It sounds like you actually have a lot of places that you can stay. Right?

LOUIE: Yeah.

DCA STEWART: You can stay at your fiancé's home.

LOUIE: Uh-huh.

DCA STEWART: You can stay at Ramsell where your sons live, you can stay at your father's house, and you have this month-to-month lease out on 35th Avenue.

LOUIE: Yes.

DCA STEWART: So what are the factors that determine for you where you should go each night?

LOUIE: It just depends where I'm closest working at that day. Yeah, it depends on my work of the day and what time I finish.

DCA STEWART: So do you have like toiletries at every single location?

LOUIE: Pretty much, yes.

DCA STEWART: Are there any where you don't have them?

LOUIE: I don't particularly have it at Ramsell, I don't have my toothbrush there.

DCA STEWART: Okay. But at the others you do?

LOUIE: Yes, at my father's house and at 35th Avenue, yes.

DCA STEWART: And what about your fiancé's?

LOUIE: No, I don't.

DCA STEWART: Okay.

SR. INV KELLY: Is it your practice, in terms of collecting mail that comes to Bridgeview to go get it yourself?

LOUIE: Yeah. When my father calls me, I go get it.

SR. INV KELLY: So, you drive across town to pick up your mail?

LOUIE: Yeah, about once or twice a month.

SR. INV KELLY: Once or twice a month?

LOUIE: Yeah, every other week. I don't check on it all the time.

SR. INV KELLY: Okay. Ms. Louie, do you acknowledge that you are required to be registered to vote in your district 30 days before you declare your candidacy?

ATTY CHUNG: And answer that only if you know.

ATTY LINNENBACH: Actually, I'm going to object to that. That calls for a legal conclusion.

SR. INV KELLY: Ms. Louie...

ATTY LINNENBACH: Don't answer that.

SR. INV KELLY: Did you have an understanding of a deadline for being a resident of your district prior to filling out the Declaration of Candidacy?

LOUIE: Residency, yes, and I have been living there before then, more than 30 days.

SR. INV KELLY: Did you have any understanding about registering to vote there?

LOUIE: I was under the impression that I registered to vote on March 8th and that I would receive a confirmation, like shortly thereafter, and never received it.

SR. INV KELLY: Right.

DCA STEWART: I think what he's asking, it sounds like you registered to vote at 35th Avenue back in March.

LOUIE: Yes.

DCA STEWART: Yes. Was that in part prompted because you were trying to meet—did you have some understanding or requirement that you be registered to vote at 35th Avenue to run in that district?

LOUIE: I didn't think about it at that time.

SR. INV KELLY: So, no, that wasn't really what I was trying to get to. You were informed when you voted in the April election. Were you not? Did you not tell me that you were informed by the Department of Elections then on April 3rd that you had...I'm sorry, I'm getting my timeline confused. On May the 7th, your father received a ballot at Bridgeview for you. Is that right?

LOUIE: No.

SR. INV KELLY: When did he receive that?

LOUIE: Hold on a second.

ATTY LINNENBACH: Do you know?

LOUIE: Yeah, he told me on May 7th, I received it.

SR. INV KELLY: Right. And you then reregistered on May 7th online. Right?

LOUIE: Yes.

SR. INV KELLY: And on May 9th, you went down to the Department of Elections and you got a ballot registered to your 35th Avenue address, and voted then and there at City Hall in that election. Right?

LOUIE: Yes.

SR. INV KELLY: So we're on the same page with that. So in-between May 9th and June 3rd when you filled out your declaration for candidacy, why did you wait until June 3rd to fill that out?

LOUIE: Because I was really busy with my work doing Chesa Boudin recall, and that was the first chance I got to take a break to go down to get the papers. I did not think about what dates, how many days, because I was still under the impression that when I filled out my voter registration on March 3rd, that eventually I would get confirmation from it and that I would be eligible from that date.

SR. INV KELLY: But no, you were told, were you not, when you went down to the Department of Elections on May 9th that you, in fact, were registered at Bridgeview?

LOUIE: Yes, they told me that and they said it was a system generated thing that happened, but I said you know, shouldn't I be credited the time that I registered to vote, or at least after I voted, which was the 3rd, I should be credited that time as a registered voter in that district.

SR. INV KELLY: In the registered voter in the Sunset?

LOUIE: In the Sunset, yes.

SR. INV KELLY: And when you asked that question, what were you told?

LOUIE: I was not given any answers.

SR. INV KELLY: Okay. Did you ask that question specifically of an election worker, "Should I not be credited with the time?"

ATTY LINNENBACH: Do you know that answer to that question? Do you recall that conversation?

LOUIE: I don't know the answer to that question.

SR. INV KELLY: Okay. So you don't recall a conversation with an election worker about getting credited time for your registration from March?

ATTY LINNENBACH: You're asking for hearsay.

DCA STEWART: No, he's not.

SR. INV KELLY: No, I'm not, I'm asking for her recollection of a conversation.

LOUIE: I mentioned it, but I didn't get any answers from anybody.

SR. INV KELLY: Okay. Do you know today when the final day was for you to declare your candidacy to run for supervisor?

LOUIE: I thought it was on or around the 10th or something like that of June.

SR. INV KELLY: Okay. And why did you pick June 3rd to register, to declare your candidacy?

LOUIE: I said this earlier, because I was really busy with the Chesa Boudin recall and I finally got a chance to take a break to register, so I just took the time to do it.

SR. INV KELLY: Okay.

DCA STEWART: So you weren't specifically waiting 30 days after you had voted at Bridgeview, you didn't have that in your mind?

LOUIE: I didn't think about it. Well, I did vote on the 3rd of April, if you think about it. So I thought from April 3rd that I would be way more than 30 days.

ATTY LINNENBACH: When you...

LOUIE: When I saw the requirement, I was...

DCA STEWART: Can you let her finish first?

ATTY LINNENBACH: Okay.

LOUIE: Yeah, I said what I said.

DCA STEWART: So you said that you thought you...

LOUIE: I voted on the 3rd of April, right, so when I got the papers to, you know, learn about the 30 days of being a registered voter, I thought that after that I'm still, you know, waiting for that Sunset registration to confirm. I thought that it would be confirmed shortly after April 3rd and I would be eligible based on the time that I turned in my ballot to the time that I drew my papers.

SR. INV KELLY: Right, but you learned...

LOUIE: That would have been 60 days.

SR. INV KELLY: Excuse me, but you learned on May 9th that you, in fact, had had your registration changed back to Bridgeview. Did you not?

LOUIE: I guess, but that was...okay. So the person that told me that that was a systems error, and he apologized, "Uh, I'm so sorry. Our system automatically changed it to that." And that's really not my fault.

SR. INV KELLY: He didn't tell you it was a systems error, did he?

LOUIE: Yes, he did. He said the system automatically reverted you back to that. Yeah, it was a system error.

DCA STEWART: He used the word 'error'?

LOUIE: Something to that effect, yes. He did apologize for it, so I thought it maybe was something that the system did that it was not supposed to do.

ATTY LINNENBACH: And when you said the word 'error', did he mean that you did not receive....

DCA STEWART: I'm sorry, she didn't confirm that he said the word error yet, she said, "Something to that effect."

LOUIE: He did apologize for the inconvenience that, you know, it wasn't supposed to do that, but it did.

SR. INV KELLY: He told you that it wasn't supposed to change your registration when you voted at an address?

LOUIE: Something to that effect. Basically, I said well, why did it do this? He said that it just automatically changed and he apologized for the inconvenience.

SR. INV KELLY: Did he say that it automatically changed because you voted on April 3rd at the Bridgeview address?

LOUIE: Yes.

SR. INV KELLY: And did he say that that's what the system does?

LOUIE: Yes and I had no idea it did that.

SR. INV KELLY: Right.

ATTY LINNENBACH: I think....may I ask a question, please. When he apologized, was it because you did not receive notice of the reversal?

LOUIE: I did not receive any notice of any reversals.

ATTY LINNENBACH: And that was what you were referring to with regard to the error. Isn't that correct?

LOUIE: Yes.

ATTY LINNENBACH: Okay.

SR. INV KELLY: Or, or did he not apologize to you for the inconvenience of having to come down to the Department of Elections and change it again?

LOUIE: And that too. He did apologize for that, that I have to come back.

DCA STEWART: I guess I'd like to get your specific memory of what he apologized for, because a lot of times people apologize because a member of the public is upset. So the fact that he says I'm sorry for the inconvenience, is pretty generic. Did he say anything more specific about what he was apologizing for? Do you remember?

LOUIE: Yeah. I went in there, I said what the heck is this? And he said let me check, so he checked. He says, "Oh, when we received your ballot and scanned it, it automatically reverted your registration back to that," and I told him, "Oh, that's not what I wanted." And he said, "Well, the only thing we can do for you right now is to register you back to the D4." And I was like, oh, my gosh, like I should have been registered from the time after my last ballot was turned in, was to be in D4. So when I signed this, I was under the impression that from the time that I turned in my last ballot, that I was still waiting for my pending confirmation from my D4, it would have been already confirmed by then.

DCA STEWART: Did he mention something about a 30-day requirement to you? You referenced a 30-day requirement.

LOUIE: He didn't talk to me about it, no.

DCA STEWART: Do you have any understanding?

ATTY LINNENBACH: I think, Leanna, he's talking about this residency requirement here.

LOUIE: Yeah?

ATTY LINNENBACH: "I meet the statutory..." see?

LOUIE: I mean I only read this and signed this.

ATTY LINNENBACH: So on the paperwork it does not say you must be a registered voter for 30 days. It says, "I meet the statutory or constitutional requirements limited to citizenship and residency." [Leslie] used residency.

LOUIE: Yes, this is what I signed for.

DCA STEWART: Right. She referenced 30-day, what were you referring to?

LOUIE: He asked me about it.

ATTY LINNENBACH: He did.

SR. INV KELLY: I did.

LOUIE: Yeah, he mentioned it.

DCA STEWART: Okay. Do you know of any requirement that's 30 days?

LOUIE: When he mentioned it.

DCA STEWART: So that's the first time you've heard anything about that?

LOUIE: Just when he mentioned it.

DCA STEWART: Okay. Because I thought you were saying yes, you thought that 30 days after April 3rd was a sufficient amount of time after....

LOUIE: That's why I answered you.

ATTY LINNENBACH: You're now getting into attorney-client discussions.

DCA STEWART: How so? I'm not asking for anything to do with her conversation.

SR. INV KELLY: Stop. Everyone please, hush. I'm sorry, I've got to regain control of this interview. I can't have this byplay, it's not helpful to anyone, it's certainly not helpful to me. So, you knew on May 9th that you had not been registered at 35th Avenue, is that correct? Actually, you knew on May 7th that your registration was still at Bridgeview. Is that correct?

LOUIE: Yes. I didn't think about it like that.

SR. INV KELLY: But you went online on May 7th and you changed your registration to 35th Avenue.

LOUIE: Yes, I did.

SR. INV KELLY: And then on May 9th, you went into the Department of Elections and you said I want to make double-darn sure that I'm registered at 35th Avenue, so please give me a

ballot that's registered to 35th Avenue and they gave you a ballot, and you voted on May 9th, that ballot from your 35th Avenue address. Correct?

LOUIE: Yes, sir, that is correct.

SR. INV KELLY: Okay. And so, when did you decide to run for supervisor?

LOUIE: Around June 3rd when I went to withdraw the papers.

SR. INV KELLY: So you just sort of came to this decision June 3rd?

LOUIE: Yes, that's how I am, I live in the moment.

SR. INV KELLY: Okay. All right. So, and did you have any understanding of the time that you took out your papers to declare your candidacy of the length of time you needed to be a registered voter in your district?

LOUIE: No. I just understand when I went there and he gave me the papers. He said read this and if you agree, sign it, so I signed it. There was nothing on there that told me it was 30 days, so I thought I was registered vote, so I thought I was okay.

SR. INV KELLY: Okay.

LOUIE: And he had me read the Oath of Office and sign it and exactly what it's [unintelligible].

SR. INV KELLY: And you have continued to live at 35th Avenue since the time you declared your candidacy?

LOUIE: Yes, absolutely.

SR. INV KELLY: Do you plan to continue to live at [REDACTED] 35th Avenue or do you expect to move into your own separate place at some point?

LOUIE: I plan to live there as long as I can, but I mean I could be moving to another location nearby, I don't know. I don't, I haven't planned that far yet. I do have a history of moving around a lot.

DCA STEWART: When do you plan to get married?

LOUIE: I don't know yet. I even forgot to wear my ring today.

DCA STEWART: You don't have a date?

LOUIE: I don't have a date yet.

DCA STEWART: Okay. And where do you and your fiancé hope to live once you're married?

LOUIE: We haven't talked about that yet.

DCA STEWART: Well, as between Ramsell and the home that he already owns, which one is the larger of the two?

ATTY LINNENBACH: Leanna, when you become supervisor, will you be living in District 4 and have an income so that you can rent a house and live with your son and your fiancé?

LOUIE: Yes, I will hope so.

SR. INV KELLY: Is that your aspiration, is to rent your own place if you become a member of the Board of Supervisors—rent your own place in your district?

LOUIE: Yes. Rent or purchase.

SR. INV KELLY: Okay.

LOUIE: Whatever I can do.

SR. INV KELLY: So that is your current aspiration is to run for supervisor, to win supervisor, and then to, at a suitable time when you're able to financially or otherwise, to rent your own independent home in your district?

LOUIE: Yes.

SR. INV KELLY: Okay.

DCA STEWART: And have you spoken to your fiancé about that? It sounds like you're hoping he'll join you there.

LOUIE: Well, we talk about all kinds of stuff. Yes, I want to live with him very much.

DCA STEWART: But has he committed to doing that with you?

LOUIE: Yeah. I mean yeah, he did propose to me and he gave me a ring.

DCA STEWART: Right. I thought you said you hadn't spoken with him yet about where you were going to live once you were married.

LOUIE: We haven't discussed any like detailed plans or anything like that, no.

DCA STEWART: But he's expressed a willingness to follow you for your work?

LOUIE: Yes.

ATTY LINNENBACH: I have a feeling that if her fiancé didn't, he wouldn't be her fiancé much longer.

DCA STEWART: Is that a fair assessment?

ATTY LINNENBACH: Leanna is her own woman.

DCA STEWART: You can answer the question.

LOUIE: I love him very much and he loves me very much, we will discuss everything.

SR. INV KELLY: So at the beginning of the interview, I referenced an August 15 letter from Andrew Shen of our office, and in it he asked you to produce various documents. I would ask that you review that letter and any documents that are compliant with that request, that you get to me as soon as possible.

LOUIE: Can we review that please? And perhaps I could answer you one-by-one, whether I can or cannot produce it and why.

ATTY CHUNG: No.

ATTY LINNENBACH: No.

ATTY CHUNG: So, we in good faith have come today with sufficient documents to establish her residency.

SR. INV KELLY: Right.

ATTY CHUNG: Which is the primary issue today, and we believe that we have not only provided corroborating statements from other witnesses that establish her sufficient residency. We've also provided somewhat of a visual inspection of her residence through the photographic collages that we've provided, and have provided an open invitation at any time to come to her property to further inspect visually, if you would like.

DCA STEWART: Does that extend to all of her residences?

ATTY CHUNG: We haven't discussed that, but if you have a particular desire to attend or inspect every single residence, just let us know and we'll confer and get back to you. All documents that we felt would sufficiently establish sufficient ties to her 35th Avenue, we have provided to you as well. We don't believe that we have to provide every document you have requested, just as you have not complied with every request we have requested either. So, we're providing the information that we think is legally necessary to establish a residency.

ATTY LINNENBACH: We also have reviewed Dennis Herrera, the opinion that Dennis Herrera's office issued with regard to the Chris Daly matter and the Ed Jew matter. We believe that these circumstances are completely different. In the sense with regard to Ed Jew, we believe that she completely complies with the rationale and holding with regards to residency as it pertains to Chris Daly. We want to make it very clear that you're welcome to come to the home on 35th Avenue. I personally have laid on the couch that was provided by the landlord in the bedroom. It is clear that you would see that this is a full residence.

DCA STEWART: I just want to say a few things, just to make sure that you have the full opportunity to provide anything that you want us to consider. Right?

ATTY LINNENBACH: And if there's things that you need specifically from us in order to advise your client, please give that to us. If there's something that you feel we're lacking or there's some clarification that you need, we want to exonerate our client and make sure that we get that to you in a timely manner, but we believe we've met the requirements.

DCA STEWART: So my understanding of the law, and I've read that memo as well, is that one can have many residences, and what we're here to determine is the legal domicile. So all of the things that we asked for in that original letter go towards trying to determine that. So it's very likely that Ms. Louie has established a residency at 35th Avenue, but whether or not that's her legal domicile is what we're trying to figure out. So anything you can provide to us that will help us in that assessment, you know, if you're eligible, we want you to be able to run. And in particular, that list of things, those are important for us to have. For example,

you've provided us with some bank records. I guess I would ask, is this the totality of your bank accounts or do you have other bank accounts?

ATTY LINNENBACH: Right.

LOUIE: I have a campaign bank account, but that didn't start until after I started the campaign, so that's not relevant.

ATTY LINNENBACH: And we have explained to Ms. Louie the importance of establishing domicile. So we're in the process of making sure that the 35th Avenue is her...she has an attachment to her family home, like many people do, but you will be receiving a transfer of like the driver's license, so that we have a permanent domicile at 35th Avenue, which is where she intends to remain until further notice.

DCA STEWART: Right. And I don't want to get into any of your communications with Ms. Louie.

ATTY LINNENBACH: Correct.

DCA STEWART: We're trying to get into her own mental state, as well as her actions. So again, anything that you can provide to us that show that, including the things on the letter, we would appreciate them as soon as possible.

ATTY CHUNG: Right. I mean Ms. Louie is following advice of Counsel. We have been her lawyers since Wednesday, so it's been three...

ATTY LINNENBACH: Thursday, actually.

LOUIE: No.

ATTY CHUNG: Thursday?

ATTY LINNENBACH: Yeah, Thursday.

ATTY CHUNG: Thursday, so it's been two or three business days and you have requested voluminous information from her, basically her entire life, and I think in a very short amount of time, we've prepared a lot of declarations, further people to interview, photographic documentary evidence, two-and-a-half hours today of mostly willing, voluntary testimony, and we've invited you to come to the home. We've provided all documents that we believe could sufficiently establish her legal residency.

ATTY LINNENBACH: And her domicile.

DCA STEWART: So what I think I'm understanding is you're not going to provide additional records, other than the ones you've promised us, with respect to the mortgage of Ramsell?

ATTY LINNENBACH: What we can provide to you right now we have. What we can provide in the future, we're trying to get more. If you're concerned about domicile, like driver's license or this or that, I can't give you things that are in the works because we don't have them yet, but if we could, for example, an application to change a driver's license, an address.

DCA STEWART: I see. So what you're saying is if new things arise, you will provide them to us?

ATTY LINNENBACH: Exactly, because we want to establish that. Okay? Ms. Louie is an immigrant from Toisan, high school graduate, military. We're working to explain, that she's let go of the home. She actually really likes this place where she's living right now, she loves it, the District 4 thing, and the house that she's in, and it's a great place. We invite you to come see her home and her domicile, which is where she's at.

SR. INV KELLY: Ms. Louie, let me just ask you one simple question from the letter that Andrew Shen sent you. Did you ever fill-out a change of address form with the post office to have your mail delivered to 35th Avenue?

LOUIE: No. I think I only did one for the 22nd Avenue when I moved in last year. I wasn't expecting to have a mold problem and then move back to my dad's house. It was just too much moving and I was working so much, and everytime I'm done with work, the post office is closed, and not all the post offices were open. Sometimes the Geary Boulevard one was closed, sometimes Taraval is closed.

ATTY LINNENBACH: Dad's house is always open and the post offices, since COVID, have shut down. So this is a woman who's literally working round the clock. The post office on West Portal, for example, has closed down. I now have to have a PO Box at UPS because I can't, myself, get to a post office.

DCA STEWART: So, I need to run to get my car out of hock, and I'll let you finish it up without me, Shawn. I just wanted to say one thing, which is we did not intend to jam you up. We have very, very strict election law deadlines that the Department of Elections has to meet.

ATTY LINNENBACH: But we can get that for you.

DCA STEWART: So we didn't ask for these things on short notice just to make life difficult for you, and we appreciate how hard you've worked to pull together as much as you have.

ATTY CHUNG: And you know, in the spirit of trying to provide whatever documents we can, one legal analysis that we're doing that we'll flag to the City Attorney is this 30-day requirement. So the Charter of San Francisco talks about just a 30-day residency requirement.

LOUIE: Which is what I signed.

ATTY CHUNG: And we believe the Charter is controlling; however, the candidate guide, which the lawyers have begun inspecting, seems to add an additional registered to vote in that district for 30 days requirement. So if the City Attorney's Office is aware of another Charter section or another legal section that mandates that additional requirement, that might assist us as well, in terms of guiding which documents to provide, because the domicile analysis is separate from the voter registration analysis.

SR. INV KELLY: Yes.

ATTY CHUNG: And so far, we've only seen the Charter controlling the residency requirement.

DCA STEWART: Right and all of that relates to the domicile analysis.

ATTY CHUNG: Okay.

SR. INV KELLY: Ms. Louie, finally, is there anything else that we've missed, unlikely as that seems, that you would like to tell us?

ATTY LINNENBACH: Just say thank you.

LOUIE: Yeah. Once this is over, can you guys come over for a glass of champagne with me?

DCA STEWART: We cannot. We cannot accept gifts from public officials, whether you win, lose, we can't accept gifts, but thank you for the offer.

SR. INV KELLY: Yeah.

LOUIE: I'm just having fun with you.

SR. INV KELLY: Thanks for the mental offer.

ATTY LINNENBACH: But we do appreciate you acknowledging that this was a very hard weekend for us.

LOUIE: It is.

ATTY LINNENBACH: We worked very diligently to provide you with additional statements.

DCA STEWART: We're all under very strict deadlines, I get it.

ATTY LINNENBACH: Yeah. We are trying very hard to comply with anything that you want and are here to assist you and your client to make sure that Ms. Louie can stay on the ballot. She is somebody who represents a significant portion of the population.

DCA STEWART: Can I just interrupt you, because I really do need to get my car.

ATTY LINNENBACH: Okay.

DCA STEWART: Or I will be locked out.

ATTY LINNENBACH: Well, I'm across the street, so I don't know.

DCA STEWART: And since this is you and not the witness, I think we're done with testimony. Correct?

SR. INV KELLY: Yes.

DCA STEWART: Yes. [Unintelligible.]

ATTY LINNENBACH: Okay. But we will provide you with change of, driver's license and, yeah, okay.

DCA STEWART: So are we going off the record?

ATTY LINNENBACH: Yeah.

SR. INV KELLY: So we'll conclude the interview. It's now 5:38 on Monday the 22nd of August 2022, and once again, this has been recorded with your knowledge and consent. Is that correct?

LOUIE: Yes, sir.

SR. INV KELLY: Okay. Let's stop.

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