

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DIVISION
4

5 LIFE FOR RELIEF & DEVELOPMENT,
6 a Foreign Not-For-Profit
7 Organization,
8 Plaintiff,

9 vs.

Case No. 2:12-13550-CV

10 Hon. Denise Page Hood

11 BANK OF AMERICA, N.A.,
12 a national banking association,
13 Defendant.

14 _____/

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16
17 The Deposition of DENNIS LORMEL
18 Taken at 1901 St. Antoine Street, 6th Floor
19 Detroit, Michigan
20 Commencing at 9:31 a.m.
21 Tuesday, December 16, 2014
22 Before Mary Oppenheim, CSR-5186
23
24
25

1 Q. Are you aware that the Civil Rights Division of the
2 Department of Justice in the state of Minnesota has
3 launched an investigation against banks to see why
4 Arab-American bank accounts are being closed without
5 reason?
6 A. No.
7 Q. Do you have an opinion why a segment of the
8 population -- of the American population, persons of
9 Arab ethnicity, seem to be experiencing these type of
10 bank closures in comparison to other segments of the
11 population that are not of Arab ethnicity?
12 MR. RODES: Objection to the extent that it
13 hasn't been established that these closures are for any
14 sort of -- one reason or another.
15 THE WITNESS: I would attribute it to risk.
16 Q. (By Mr. Akeel): Can you please explain to me, why is
17 there -- when you say risk, what do you mean?
18 A. Where the entities have identified them, fairly or
19 unfairly, as high-risk.
20 Q. Do you think persons' names contribute to that
21 perception of possible risk if your name is Ahmed or
22 Mohammed or Samir or things like that?
23 A. It shouldn't.
24 Q. Do you believe that that can contribute?
25 A. I don't think I can answer that, honestly. I really

1 haven't seen it on an individual basis. I've seen it on
2 a company basis. I've seen, for instance -- was it Dara
3 Salam in Arlington, Virginia, they had their bank
4 account closed.
5 Q. As you sit here today, based on the records that you've
6 looked at, have you been able to discover any evidence
7 of any illegal act at all committed by Life?
8 A. No.
9 Q. Are you aware that Life has a United Nations
10 consultative status?
11 A. I believe I saw that, or something to that effect, on
12 the website.
13 Q. Do you know what that means?
14 A. No.
15 Q. Do you have a specific motivation why you agreed to be
16 an expert witness here against Life For Relief &
17 Development that you can share with us?
18 MR. RODES: Objection to characterization of
19 "against."
20 MR. AKEEL: It's against Life. We're on the
21 other side. We're on the side of the V.
22 MR. RODES: You put it in terms of engaged as
23 an expert against Life. He's engaged as an expert to
24 offer testimony and to consult.
25 Q. (By Mr. Akeel): When you were asked to be an expert,

1 you knew that the Plaintiff was Life For Relief, right?
2 A. Yes.
3 Q. Back to my question. Do you have any motivations that
4 you can share with us on why you agreed to be an expert
5 witness for Bank of America in this case?
6 A. Just from the standpoint of reviewing the account
7 information I was presented.
8 Q. Do you have any motivations to close down -- to see what
9 you can do to try to close down Life For Relief &
10 Development?
11 A. No.
12 Q. Yesterday there was some discussion regarding the
13 corporate compliance plan that was enacted by Life's
14 fraud expert?
15 A. Yes.
16 Q. Did you have a chance to review it?
17 A. Yes.
18 Q. Do you have an opinion regarding the corporate
19 compliance plan?
20 A. It seems like a good plan. You used the word yesterday,
21 Mike, "robust."
22 MR. AKEEL: I'd like to mark this -- I want
23 to make sure we're referencing the same one -- as
24 Exhibit 7.
25 MR. RODES: Shereef, that was provided to us

1 and we reserve the right, to the extent necessary, to
2 supplement any of the materials that Mr. Lormel has
3 prepared after he's had a chance to subsequently review
4 that document.
5 MR. AKEEL: Of course.
6 (Whereupon Deposition Exhibit No. 7
7 was marked for identification.)
8 Q. (By Mr. Akeel): I made reference to Exhibit 7, which is
9 a corporate compliance plan. Is that the one you were
10 referring to?
11 A. I didn't have a chance to look at it in detail. I
12 skimmed it and certainly listened to the explanation.
13 Q. If there's anything that you believe is different than
14 what you testified to, please -- or obviously advise
15 your attorney and we can get a report, I suppose.
16 MR. RODES: Yes.
17 MR. AKEEL: This is Exhibit 8.
18 (Whereupon Deposition Exhibit No. 8
19 was marked for identification.)
20 Q. (By Mr. Akeel): We've discussed earlier regarding your
21 opportunity to review the expenses that were related to
22 the bank account. Do you remember that line of
23 testimony?
24 A. Yes.
25 Q. Are these the expenses -- I just want to confirm -- that