

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

RICKY DIXON,
MEGHAN THOMAS,
JESIKA BLAKELY,
AMANDA CHRISTIAN,
DWAN ASHONG A/K/A DWAN GILPIN,
JOHN GAINES A/K/A MARTY GAINES,
CHARLES PETTY A/K/A CHARLES KNIGHT,
JERRY BAPTISTE,
CARLA JACKSON,
DEREK PARKER,
DAVID BELGRAVE II,
CHARLES HILL IV,
RYAN WHITTLEY,
EL HADJ SALL, AND
RICK MCDUFFIE

Criminal Indictment

No. 1:20-CR-296

Organizational Victim Disclosure Statement
Pursuant to Fed. R. Cr. P. 12.4(a)(2)

Pursuant to Rule 12.4(a)(2) of the Federal Rules of Criminal Procedure, the United States identifies the following additional organizational victims of the alleged criminal activity and makes the following disclosures under Rule 12.4(a)(1) based on its exercise of due diligence:

1. CDC Small Business Finance

- a. The United States has not been able to obtain the information required by Rule 12.4(a)(1) through due diligence.

2. Digital Federal Credit Union

- a. Digital Federal Credit Union does not have a parent corporation.

- b. There is no publicly held corporation that owns more than 10% of Digital Federal Credit Union's stock.
- 3. BB&T
 - a. BB&T is a wholly owned subsidiary of BB&T Corporation.
 - b. There is no publicly held corporation that owns more than 10% of the stock of BB&T Corporation.
- 4. Navy Federal Credit Union
 - a. Navy Federal Credit Union does not have a parent corporation.
 - b. There is no publicly held corporation that owns more than 10% of Navy Federal Credit Union's stock.
- 5. Del Norte Credit Union
 - a. Del Norte Credit Union does not have a parent corporation.
 - b. There is no publicly held corporation that owns more than 10% of Del Norte Federal Credit Union's stock.
- 6. USAA
 - a. USAA does not have a parent corporation.
 - b. There is no publicly held corporation that owns more than 10% of USAA's stock.
- 7. Bank of America, N.A.
 - a. Bank of America is a wholly owned subsidiary of BAC North America Holding Company. BAC North America Holding Company is a wholly owned subsidiary of NB Holdings Corporation. NB Holdings Corporation is a wholly owned subsidiary of Bank of America Corporation.

- b. Based on the U.S. Securities and Exchange Commission Rules regarding beneficial ownership, Berkshire Hathaway Inc., 3555 Farnam Street, Omaha, Nebraska 68131, beneficially owns more than 10% of Bank of America Corporation's outstanding common stock.
- 8. State Farm Bank
 - a. State Farm Bank is a wholly owned subsidiary of State Farm Mutual Automobile Insurance Company.
 - b. There is no publicly held corporation that owns 10% or more of State Farm Bank's stock.
- 9. Regions Bank
 - a. Regions Bank is a wholly owned subsidiary of Regional Financial Corporation.
 - b. There is no publicly held corporation that owns 10% or more of Regional Financial Corporation's stock.
- 10. PNC Bank
 - a. PNC Bank is a wholly owned subsidiary of PNC Bancorp, Inc. PNC Bancorp, Inc. is a wholly owned subsidiary of The PNC Financial Services Group, Inc., which is a publicly held company trading under the ticker PNC.
 - b. There is no publicly held corporation that owns 10% or more of The PNC Financial Services Group, Inc.'s stock.

/s/ TAL C. CHAIKEN

TAL C. CHAIKEN

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