



**U.S. Department of Justice**  
**United States Attorney**  
**Northern District of Georgia**

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*Richard Russell Federal Building      Telephone: (404) 581-6000*  
*75 Ted Turner Drive S.W.              Fax: (404) 581-6181*  
*Suite 600*  
*Atlanta, Georgia 30303*

August 6, 2021

Gabe Banks  
100 Peachtree Street, NW, Suite 260  
Atlanta, Georgia 30303

Re:     United States v. Christian  
       Criminal Action No. 1:20-cr-296-JPB-CMS

Dear Gabe:

Discovery in the above-referenced criminal action has been uploaded to the drive that you provided. The discovery includes Paycheck Protection Program and Economic Injury Disaster Loan files, financial records, recorded interviews, email records, evidence from seized devices, IP records, search warrants and seizure warrants and returns, criminal history records, and other materials. The attached spreadsheet identifies the specific Bates ranges of records included on the drive. The discovery is subject to the protective order in this case (DE 40).

I am providing discovery pursuant to your request, and I hereby request reciprocal discovery of you as provided by the Federal Rules. Specifically, you are requested to provide the undersigned all material covered by Rules 16(b) and (c), and 12.1, 12.2, and 12.3 of the Federal Rules of Criminal Procedure.

The discovery drive has been encrypted and I will send you the password via email.

If you have any questions, please do not hesitate to call.

Sincerely,

KURT ERSKINE  
*Acting United States Attorney*

/s/ Tal C. Chaiken  
TAL C. CHAIKEN  
*Assistant United States Attorney*

Enclosure