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

UNITED STATES OF AMERICA,	)	
	)	
	)	
-VS-	)	DOCKET NO. 1:20-CR-00296-JPB
	)	VOLUME 6 (PM SESSION)
CARLA JACKSON AND	)	
TELDRIN FOSTER,	)	
	)	
DEFENDANTS.	)	

TRANSCRIPT OF JURY TRIAL PROCEEDINGS
BEFORE THE HONORABLE J.P. BOULEE
UNITED STATES DISTRICT JUDGE
FEBRUARY 12, 2024

APPEARANCES:

ON BEHALF OF THE GOVERNMENT:
TAL C. CHAIKEN, ESQ.
SAMIR KAUSHAL, ESQ.
BABASIJIBOMI MOORE, ESQ.
ASSISTANT UNITED STATES ATTORNEYS

ON BEHALF OF THE DEFENDANT - TELDRIN FOSTER:
LEIGH ANN WEBSTER, ESQ.
SARALIENE DURRETT, ESQ.

ON BEHALF OF THE DEFENDANT - CARLA JACKSON:
DAVID D. MARSHALL, ESQ.

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PENNY PRITTY COUDRIET, RMR, CRR
OFFICIAL COURT REPORTER
UNITED STATES DISTRICT COURT
ATLANTA, GEORGIA

I N D E X

WITNESS: PAGE:

1. JOSEPH STITES

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- - - - -

(PROCEEDINGS HELD IN OPEN COURT AT 12:51 PM, ATLANTA, GEORGIA)

THE COURT: Officer, do we know if we have all the jurors ready.

COURTROOM SECURITY OFFICER: They're ready.

THE COURT: Okay, great. We'll need them in just a minute here.

All right. I've spent some time studying this issue. There's a series of questions that started with, So he came in for the interview in which he agreed to be truthful? Followed by a question, You wanted him to be truthful? Followed by a question, So he agreed to be truthful. And then, He didn't do that, did he? And then the objection.

And Ms. Webster has clarified that the next question will be, He lied to you about Gena Pyfrom-Foster's involvement?

The objection was 608 and 404(b). Ms. Webster, as an officer of the court, has stated that this doesn't have anything to do with impeachment, doesn't have anything to do with us calling him a liar. I have some pause about that, given the three, four, five questions, whatever it was, about his truthfulness.

Nevertheless, Ms. Webster says it's not about impeachment, so I won't sustain the objection on 608. That lines up with 404(b) and propensity.

So, Ms. Webster, if -- as you say, as to hearsay, you

said it's not offered for the truth, instead this is simply to, quote, show that he was protecting Gena Pyfrom-Foster.

So, Ms. Chaiken, I don't think I can sustain on 608 or 404(b) or hearsay, for that matter, given what Ms. Webster has said she's going to use this for, the -- protecting Gena Pyfrom-Foster.

However, Ms. Chaiken, as you've noted, if this comes in this way, that arguably opens the door, and I believe it probably does, we'll just have to cross the bridge as to whether the door is open and how far and how wide it's open when we get there as far as this issue of protecting Gena Pyfrom-Foster. So the objection is overruled.

Let's bring out the jury, please.

(The jury entered the courtroom at 12:54 p.m.)

THE COURT: Y'all can be seated.

Ladies and gentlemen of the jury, sorry about that break that turned into lunch. But, again, I can't always anticipate issues that arise and how long I'm going to need to discuss them with counsel and research those issues. So apologies for the long break. Apologies from me for the long break.

Ms. Webster, go ahead.

The objection is overruled.

MS. WEBSTER: Thank you, Your Honor.

BY MS. WEBSTER:

Q. Agent Stites, I want to talk to you about some of the actions that you took during the course of your investigation.

A. Okay.

Q. I believe you got the IP addresses for different people; is that right?

A. Yes.

Q. You got the IP address for Darrell Thomas's residence?

A. Yes.

Q. Carla Jackson?

A. Yes.

Q. John Gaines?

A. Which residence for John Gaines?

Q. Did you -- I mean, it's fine if you don't remember it.

A. I don't think so.

Q. Okay. You did not get an IP address for the house where Teldrin Foster lived; is that correct?

A. No.

Q. You didn't get an IP address for the house where Gena Pyfrom-Foster lived; correct?

A. I don't recall if we have that or not.

Q. You subpoenaed e-mail addresses in this case?

A. Yes.

Q. And you subpoenaed, for example, Darrell Thomas's e-mail addresses; is that right?

A. Yes.

Q. You did not subpoena Teldrin Foster's e-mail's address teldrin_foster@yahoo.com; is that correct?

A. Correct.

Q. You did not subpoena the e-mail address teldrin23@icloud.com; is that correct?

A. That's correct.

Q. You did not subpoena the IP address associated with those e-mails or the log-ins for those e-mails?

A. No, no.

Q. You did not seize any devices from the home of Gena Pyfrom-Foster; is that right?

A. Correct.

Q. And you were in her home when you went to interview her; is that correct?

A. Yes.

Q. And you saw devices when you were there?

A. Yes.

Q. A laptop and a desktop?

A. Saw a desktop upstairs and a laptop downstairs.

Q. So you didn't take any efforts to get those devices?

A. No.

Q. You didn't seize her phone?

A. No.

Q. I think in this case you executed two search warrants of homes. Does that sound correct?

A. Yes, that's correct.
Q. And one was for Jesika Blakely?
A. Yes.
Q. And one was for Darrell Thomas?
A. Correct.
Q. And that address was the 7200 Grandview Overlook; is that correct?
A. For Darrell Thomas, yes.
Q. Yes. Okay.

And can you look in the binder in front of you at Exhibits F15A through F15PP?

A. You said F15A through F15PP?
Q. PP. Yes.
A. Okay.
Q. Do you recognize those photos?
A. Yes.
Q. Can you tell us what they are?
A. These are the search warrant photos for Darrell Thomas's residence.
Q. And were you there when these photos were taken?
A. I was.
Q. And do these appear to be true and accurate copies of the photos that were taken from that execution of that search warrant?
A. Yes, they do.

MS. WEBSTER: Your Honor, I move to admit F15A through F15PP.

MS. CHAIKEN: No objection.

THE COURT: Mr. Marshall?

MR. MARSHALL: No objection, Judge.

THE COURT: They're admitted.

MS. WEBSTER: Can I have the Elmo, please.

BY MS. WEBSTER:

Q. Can you tell us what's in this photo?

A. I believe this is the master bedroom bed with, it looks like, some gold chains and a firearm with a magazine and maybe one round.

Q. Okay. And is this --

A. And a holster.

Q. I'm sorry?

A. And a holster.

Q. And a holster.

And is this the room that you believe that Darrell Thomas was occupying?

A. Yes.

Q. Can you tell us what's in F15B, please?

A. This is a picture of the garage. And there is a purple -- I believe it's an Acura.

Q. Okay. Thank you.

Can you tell us what's in Exhibit F15E?

A. This is a picture of that same garage from the front. And there's the purple Acura to the left and a Range Rover to the right.

Q. And did you seize both of these cars?

A. We seized the Range Rover. That's the only one we had a seizure warrant for that was there.

Q. Okay. And then can you tell me what's in F15F?

A. This is a bag of cash.

Q. Did you count this cash? Do you know how much is in it?

A. We did count the cash. I don't recall the exact amount, but it should be on my 302 if you've got that.

Q. Sure. Is this all of it, or is this all of it displayed -- I'm sorry, I'm referring to F15K. Is this all of -- is this the cash from that bag spread out on the counter or is this different cash?

A. I believe that's the cash from the bag. And I don't know if that was one of many pictures or not.

Q. And what's in F15L?

A. A watch that's in a box.

Q. And is that a piece of jewelry that you seized from Darrell Thomas's house?

A. I believe we did seize this.

Q. Can you tell me what's shown in F15M?

A. This is a paper copy of a payroll spreadsheet for Bellator Phront Group for the -- it looks like the first

quarter of 2019.

Q. Okay. That's one of the documents that was used in support of the loan applications?

A. Yes.

Q. Can you tell me what's in this picture, F15N?

A. It's a picture of nine rapid! PayCards that were found at the residence.

Q. Okay. And so these cards, they weren't all issued in Darrell Thomas's name; is that right?

A. Correct.

Q. Can you show me what's in -- tell me what's in F15S?

A. Can I look in the book? I want to see the picture.

Q. Yeah, of course.

A. This looks like a laptop bag with a phone. And it looks like the receipt for the hotel Encore in Las Vegas, the hotel receipt.

Q. Okay. And I'm going to show you what's in F15T. And then we'll go -- maybe go back to that.

Does F15T show you the Lenovo computer that we've discussed in court?

A. Yes.

Q. Okay. And so going back to F15S, you said that it showed -- and I recognize it's hard to see on this, but it's a receipt from Encore Las Vegas; is that right?

A. Yes.

Q. And you're aware that Darrell Thomas traveled to Las Vegas shortly before the execution of this search warrant; is that right?

A. That's correct.

Q. During that time he was withdrawing a fair amount of money from the rapid! PayCards; is that correct?

A. Yes, I believe so.

Q. Okay. And so this receipt from that trip was located -- was it located in the same bag as the Lenovo laptop or was it just around it?

A. This should have been a picture in place. So based on this picture, I would say that it was inside the bag.

Q. Okay. So this receipt from Las Vegas was found inside the bag with the Lenovo laptop?

A. Yes.

Q. And then the phone that's in this picture, do you know if that's the one that was -- that Agent Hunter was able to get into, or is that the one that she hasn't been able to get into?

A. I don't know. I'm not sure.

Q. Can you tell me what's in F15U?

A. It looks like a chain and then some coins to the right.

Q. And is there more jewelry shown in F15X?

A. Yeah. I think that's the same jewelry that was on the bed. It looks like a bracelet and a necklace and a watch.

Q. And the watch. Okay.

And then F15AA shows a fair amount of cash. Do you know if that's the same cash or if it was a different pile of cash?

A. I believe that's a different pile of cash.

Q. Okay. And then I'm going to show you F15CC. Is that a different box with cash in it?

A. I believe so.

Q. Do you know what this F15LL is?

A. It's a laptop, a Panasonic laptop.

Q. Is this one of the ones that Agent Hunter wasn't able to get into, or you're not sure? It's okay.

A. I don't know if she got into it or not, but it wasn't applicable. It was a business laptop I think for marking utilities. It was -- it wasn't really a personal laptop. I think it was a business laptop that was used in marking utilities in neighborhoods and things like that. We weren't really sure what it was.

Q. Okay. And then showing F15H, is this a different car that was also in Mr. Thomas's house?

A. Yes.

Q. And what sort of car is this?

A. I believe this was a Bentley.

Q. So there were no other search warrants associated with the residence of Mr. Foster; is that right? Or no. Sorry. Let me just be clear.

There was no search warrant associated with the residence of Mr. Foster?

A. No.

Q. And none associated with the residence of Gena Pyfrom-Foster?

A. No.

Q. We talked a bit briefly about the -- the money in this case that was received; right? We talked a little bit about that earlier?

A. Yes.

Q. Okay. So we know that some of the money went to Bellator initially once it came in through the business owners?

A. Correct.

Q. And some of it went to Elite Executive?

A. Correct.

Q. And then some of it went to rapid! Pay?

A. Correct.

Q. Okay. And then at other times in the conspiracy, did some of it go to a company called Kronos Capital Acquisitions?

A. I believe there was some money that got transferred to Kronos.

Q. And the same for Richland Properties; is that right?

A. I believe so.

Q. And all those companies, were they ultimately controlled by Darrell Thomas?

A. Darrell had a hand in those companies as well.
Q. Okay. And so just to be clear, Teldrin Foster had no control over those entities?
A. No, not that I'm aware of.
Q. Do you know how much Darrell -- how much money Darrell Thomas received through the PPP loan fraud?
A. How much got transferred to him?
Q. Yes.
A. I don't have a number on top of my head.
Q. Is it in the millions?
A. Yes.
Q. More than 10 million?
A. I don't think a total of 10 million. I don't think more than 10 million went to him.
Q. Went to him. Okay.
A. Or to his businesses or to the rapid! PayCards.
Q. And Darrell Thomas used a lot of money to buy a number of different items; is that right? I can be more specific.
A. Please.
Q. He used it to buy a lot of jewelry; right?
A. He bought some jewelry.
Q. So that's what we saw in these pictures or some of it?
A. Yeah. I don't know if it's that specific money from the PPP or if it was other money, but he did have jewelry with some receipts.

Q. And he bought gold bars with the money?
A. We had heard that he had bought some gold bars, yes.
Q. Did he purchase land with the money?
A. Yes.
Q. And do you know how many different properties he purchased?
A. I believe there were three.
Q. Do you know how much those properties are worth?
A. I don't recall.
Q. Was there any evidence that Teldrin Foster engaged in purchases like that?
A. No.
Q. There's no evidence that Teldrin Foster bought land?
A. No.
Q. Or expensive jewelry or gold bars?
A. No.

MS. WEBSTER: Ms. Holland, can we see Exhibit 3002, please.

BY MS. WEBSTER:

Q. On direct you testified that this lists all the WhatsApp calls between Teldrin Foster and Darrell Thomas; is that right?
A. Yes.
Q. It's a summary chart of those records?
A. Correct.

Q. And so can you just tell me, do you see in the status column where it says "missed" and then "not answered," do you know what the meaning of -- what that -- why those are different?

A. I do not know.

Q. And if you look in the "duration" column, do you see that a fair number of these are zero?

A. Yes.

Q. Okay. So that indicates that they did not actually communicate in those calls; is that correct?

A. Yes.

Q. So when we scroll down and there are more pages --

MS. WEBSTER: Can we just see, for example, page 2. You can keep going to page 3. That's fine.

BY MS. WEBSTER:

Q. So every time it says "missed" and there's a duration of zero, or "not answered," they didn't actually communicate; is that right?

A. Correct.

Q. So the sheer number of entries on this document does not tell us every time they communicated; is that right?

A. Correct.

Q. On direct I think that you said that Teldrin Foster and Darrell Thomas only could have been talking about the PPP fraud; is that right, or that's what you saw in your review of

the communications?

A. During the time frame of PPP, not prior to it. But during the time frame it appeared that the communications were directed towards PPP fraud.

MS. WEBSTER: Ms. Holland, can we see Exhibit 2301. I think that's been admitted.

BY MS. WEBSTER:

Q. Do you see on March 27th of 2020, this line that says, Dude want to know what all he need to do for business line to get a loan?

A. Yes.

Q. And then there's discussion about what he would need to get a loan, is that right, in the next -- in the information from Mr. Thomas in the next callout box?

A. Yes.

Q. So that -- that predates the PPP loan application, is that right, or when that information became available?

A. That's the date that the PPP program was announced through the CARES Act.

Q. And so does that appear to be about a PPP loan or other forms of business finance?

A. That looks like other forms of business finance.

Q. And then if you look at the next paragraph, it says, 10K per body. We need SS card or social, no CPN and copy of license. Send everything to tardean83@gmail.com.

That's what that says, yes?
A. Correct.
Q. Did you get a search warrant for that e-mail address?
A. No.
Q. And we've already established you didn't get a search warrant for Mr. Foster's e-mail addresses; correct?
A. Correct.
Q. So we don't know if there were any e-mails sent in between Mr. Foster's e-mail address and this e-mail address?
A. Correct.
MS. WEBSTER: Can we see Government's Exhibit 2305, please. Can we go to the next page.
BY MS. WEBSTER:
Q. That top callout there. So this is, She said you need to get a EFIN and an EIN, PTIN for a tax business; is that right?
A. Yes.
Q. Do you know that an EFIN is?
A. I believe it's the employer identification number, just like an EIN, I believe. I'm not positive what it stands for.
Q. The employer identification for what? I think I missed --
A. Identification number, like an EIN.
Q. And so they're referencing an EFIN and then an EIN; correct? And then a PTIN; correct?
A. Correct.

Q. For a tax business; is that right?
A. Correct.
Q. You don't need those things to -- I mean, you might need an EIN, but do you need an EFIN or a PTIN to apply for a PPP loan?
A. I don't believe so.

MS. WEBSTER: I'm done with this exhibit. Thank you.

BY MS. WEBSTER:
Q. I think on direct we talked about -- or you talked about a Navy Federal account for Mr. Foster; is that right?
A. Yes.
Q. Okay. And that's the only bank account that you subpoenaed associated with Mr. Foster; is that right?
A. I believe so.
Q. And you know from your interview that Mr. Foster works as a barber; is that correct?
A. Yes.
Q. Okay. And he's not a W-2 employee. Does that sound right?
A. Correct.
Q. So he wouldn't be getting regular paychecks; is that right?
A. As a barber, probably not, no.
Q. And it may be more of a cash-based business?
A. Correct.

Q. Do you remember on direct discussing a phone -- or a part of the interview with Mr. Foster where he says something to the -- that what they were involved in was for like $100,000? Does that sound familiar?

A. Can you put more context to that?

Q. Yeah.

It's in Exhibit 2250E, and he sort of references something being for $100,000.

A. Can we pull up that exhibit?

Q. Sure.

(Government Exhibit 2250E published.)

BY MS. WEBSTER:

Q. I might have pulled up the wrong clip. So let me go back for a second.

Were any of the PPP loans for $100,000?

A. No.

Q. And are you aware of the EIDL loans?

A. Yes.

Q. And are you -- can you tell us what an EIDL loan is?

A. They're emergency loans for companies that as they got into -- into the pandemic and the COVID, that they were losing money. And so there was an opportunity to get a loan of approximately $10,000 to get them back.

Q. And that was an advance, right, the EIDL advance? And then you could also get a loan for more money; is that right?

A. Correct.

Q. You're aware Bellator Phront got an EIDL loan? Yes?

A. Yes, I believe so.

Q. For $150,000?

A. Something like that.

MS. WEBSTER: Can we please see Government's Exhibit 2306. And then can you scroll down to the next page. Is that the end of that? That's at the end? Keep scrolling, please. Sorry. Go back up to page 9, I think, or page 8.

BY MS. WEBSTER:

Q. So can you see where he's saying -- or where the Teldrin Foster WhatsApp account is saying, So now we have to find the deductions?

A. Yes.

MS. WEBSTER: Then can we go back up one more page to page 7, please.

BY MS. WEBSTER:

Q. And then he's saying, The amount owed in taxes is about $40,000; is that right?

A. Yes.

Q. So that appears to be a conversation about a tax return; is that right?

A. Yes.

Q. And then I'm going to have you look at Exhibit F402, which might not be in front of you, so give me one second.

A. Did you say 402?
Q. 402, yes.
A. Okay.
Q. Have you seen this document before?
A. Yes.
Q. Can you tell me what it is, please?
A. It's an e-mail, the original e-mail message -- e-mail string. But the original e-mail message was from Gena Pyfrom to Darrell Thomas. And then it looks like Darrell then forwarded that e-mail from his Bellator account to -- back to Gena Pyfrom.
Q. Is this a true and accurate copy of what you received from a subpoena, or does it appear to be so?
A. It appears to be, yes.

MS. WEBSTER: Your Honor, we move to admit F402, pursuant to a 902.11 certification.

MS. CHAIKEN: No objection.

MR. MARSHALL: No objection, Judge. Sorry.

THE COURT: It's admitted.

BY MS. WEBSTER:
Q. Is this the e-mail that we were just referencing in F402?
A. Yes, it is.
Q. Who is this e-mail from?
A. From Gena Pyfrom.
Q. And it's to Darrell Thomas; is that correct?

A. Yes.
Q. Are they discussing a Form 1120?
A. Yes.
Q. And do you know what a Form 1120 is?
A. Corporate tax return.
Q. So they're discussing the corporate tax return for Bellator Phront Group; is that right?
A. Yes.
Q. Can you look in the other binder that you were looking at before at Exhibit F21, please.
A. Okay.
Q. Can you tell me what this appears to be?
A. This is a -- a note from a phone that has a title of Completed Consulting Contracts, and then it lists 25 business names.
Q. And have you seen this document before?
A. Yes.
Q. Where did you see it?
A. I believe this was a note that Gena Pyfrom-Foster had sent to Darrell Thomas.
Q. And does this appear to be a true and accurate statement of what you reviewed in those messages?
A. Yes.

MS. WEBSTER: Your Honor, at this time I move to admit Exhibit F21.

MS. CHAIKEN: We object to hearsay.
MR. MARSHALL: No objection, Judge.
THE COURT: All right. What's your response?
MS. WEBSTER: I'm sorry, I didn't hear the objection.
MS. CHAIKEN: Hearsay.
MS. WEBSTER: Your Honor, it's not a statement, it's just a list. So I don't believe that it is --
THE COURT: Can you hand me a copy of the document --
MS. WEBSTER: Yes.
THE COURT: -- please?
Ms. Chaiken.
MS. CHAIKEN: It's offered to prove the truth of the matter asserted.
MS. WEBSTER: Your Honor --
THE COURT: It seems like an assertion of what the list of completed consulting contracts is.
MS. WEBSTER: Alternatively, Your Honor, then we're going to move to admit it under the residual hearsay exception, Rule 807.
THE COURT: Expand.
MS. WEBSTER: Your Honor, under Rule 807 you can admit documents that would otherwise constitute hearsay if there is sufficient reliability. And we -- I can definitely establish the reliability of this document. Also including the -- and I can establish those completed -- that list of

completed contracts was actually completed by Gena Pyfrom-Foster.

THE COURT: Okay. I'll let you try to do that, if you'd like.

Do you have another copy I can hold on to while we --

MS. WEBSTER: I can...

BY MS. WEBSTER:

Q. Agent Stites, have you reviewed the WhatsApp communications between Gena Pyfrom-Foster and Darrell Thomas?

A. Yes.

Q. And can you see in those messages and in the corresponding e-mails documents that were sent by Gena Pyfrom-Foster to Darrell Thomas?

A. Repeat the question? I'm sorry.

Q. You're fine.

Can you see in the messages between Gena Pyfrom-Foster and Darrell Thomas discussions about various companies for which loans were submitted for PPP loans?

A. Yes.

MS. CHAIKEN: Your Honor, this is all hearsay as well.

MS. WEBSTER: I'm not offering the -- you can see the documents going back and forth. Those aren't statements, Your Honor.

MS. CHAIKEN: She's offering it to prove the

trustworthiness of what was said in the messages to prove that that's actually what happened. That's exactly what hearsay is.

THE COURT: I guess if you're seeking to go under 807, was there notice of this?

MS. WEBSTER: There was, Your Honor.

THE COURT: There was?

MS. WEBSTER: There was.

THE COURT: Okay.

MS. CHAIKEN: There was notice. We objected to it, but, yes, there was notice that they would try to use 807.

THE COURT: All right.

MS. WEBSTER: I didn't receive an objection.

THE COURT: I'm going to overrule to the extent she's trying to lay a foundation.

So go ahead.

MS. WEBSTER: Thank you, Your Honor.

BY MS. WEBSTER:

Q. In the messages between Gena Pyfrom-Foster and Darrell Thomas, there are communications about various loans, is that right, or various companies?

A. Yes.

Q. And there are communications about companies for which there were later submitted PPP applications; is that correct?

A. Yes.

Q. Have you looked at F21 and are you familiar with the names of the companies on this document?

A. Yes, I am.

Q. And are you aware that documents, including 941 forms and payroll spreadsheets, for these documents -- for these companies were sent to Darrell Thomas?

A. Yes.

Q. And is there any list or name on this list for which you don't believe a PPP loan application was submitted?

A. I'm not positive on some of them, whether they actually were submitted to a lender, but I believe most of them we saw in the documents and the messages.

Q. And then the documents were being prepared for the purpose of submitting to a lender?

A. That's what I'd assume.

Q. And have you reviewed the e-mails that were sent to Darrell Thomas's e-mail address?

A. Yes.

Q. Okay. And did you see in those e-mails the documents that we're referring to?

A. Yes.

MS. WEBSTER: Your Honor, I think that we've laid a foundation to establish that these were -- that there's sufficient corroboration for the information in this document.

THE COURT: Ms. Chaiken.

MS. CHAIKEN: Same objection, Your Honor.

THE COURT: Overruled. It's admitted.

MS. WEBSTER: Thank you, Your Honor.

May I have the copy back?

THE COURT: Sure.

BY MS. WEBSTER:

Q. I want to go back over what this is now that the jury can see it, Agent Stites. So just to be clear, this document was sent from Gena Pyfrom-Foster to Darrell Thomas; is that correct?

A. Correct.

Q. And it says, Completed Consulting Contracts at the top; is that right?

A. Yes.

Q. And then the first one is Bellator Phront Group; is that right?

A. Yes.

Q. And that is a company for whom -- for which a loan has been charged in this indictment; is that right?

A. Yes.

Q. Is it also -- can you go through and identify the ones that are charged in this indictment?

A. Yes. Number 1, Bellator Phront Group. Number 4, D. Parker Holdings, Inc. Number 5, All Star Room and Board. Number 9, Continuing Success. Number 10, ML Exotic Customs.

Number 13, Advertising and Then Some.

Do you want to scroll down?

Number 23, Infinite Education.

Q. Can you see 25?

A. Number 25 is Bellevie Corp.

Q. Are any of these for documents or loans charged in the indictment?

A. Number 41, Mikies Auto & Tire, LLC.

Q. To your knowledge, were there legitimate consulting services provided for these companies?

A. No.

Q. In the other binder that had the e-mails, can you please look at F405 and F406.

A. Yes.

Q. Do you recognize these documents?

A. I do.

Q. And what are they?

A. E-mail chains. The first message is from Jesika Blakely to Darrell Thomas. And then that message is forwarded from Darrell Thomas to teldrin23@icloud.

Q. And that's for 405 and 406; is that right?

A. Yes.

MS. WEBSTER: Your Honor, I'm --

BY MS. WEBSTER:

Q. And did you receive these in response to a subpoena to

Google?

A. Yes.

MS. WEBSTER: Your Honor, I'd move to admit F405 and 406 pursuant to the 902.11 certification.

MS. CHAIKEN: No objection.

MR. MARSHALL: No objection, Judge.

THE COURT: They're admitted.

BY MS. WEBSTER:

Q. Is this the first -- this is F405. And this is an e-mail from Darrell Thomas to teldrin23@icloud.com; is that right?

A. Yes.

Q. He's sending information about TY Trucking, Securus Brothers and Transportation Management; is that right?

A. Yes.

Q. And then if we go back to F21, can you see those companies on this list?

A. I see Securus.

Q. You see TY Trucking; correct?

A. Yes, I see TY Trucking.

Q. And --

A. And then Securus Brot Trust.

Q. Securus?

A. Yeah. S-E-C-U-R-U-S, Brot, B-R-O-T, and then Trust.

Q. And if we go to 406, do you see which loans this is referring to, or which companies?

A. 360 Global Logistics, Da Diamond Shines, Robins Trading and Driving Under the Influence (sic).

Q. Going back to F21, do you see Driving Under Intelligence?

A. I'm sorry, Intelligence.

THE COURT: Could you go to the microphone, please. I'm having trouble hearing you when you're over there.

MS. WEBSTER: Yes.

THE COURT: Thank you.

BY MS. WEBSTER:

Q. So just to be clear, F406 refers to Driving Under Intelligence; right?

A. Intelligence, sorry.

Q. And then that is what's on the F21; is that right?

A. Yes.

Q. And do you see the Diamond Shines as well on this list? I think it's number 38.

A. Yes, I see that.

Q. Can you look at Exhibits F450 and 451, please. Or, actually, if you just look at F451, that would be fine.

A. Yes.

Q. Do you recognize this document?

A. I do.

Q. Is this an e-mail that you received in response to the subpoena to Google?

A. Yes.

MS. WEBSTER: Your Honor, I move to admit that pursuant to the Rule 902.11 certification as well.

MS. CHAIKEN: No objection.

MR. MARSHALL: No objection.

THE COURT: It's admitted.

MS. WEBSTER: Thank you.

BY MS. WEBSTER:

Q. Do you see that this is the same pattern that -- it's an e-mail from Darrell Thomas to teldrin23@icloud.com?

A. Yes.

Q. And it refers to 346 Unlimited?

A. Yes.

Q. And do you see the date of that e-mail?

A. May 7th, 2020.

Q. Going back to F21. Can you tell me what's listed as number 2?

A. 346 Unlimited.

Q. So is that the same company that's referenced in F451?

A. Yes.

Q. Do you recall testifying on direct that in his statement Mr. Foster had told Ms. Pyfrom-Foster -- or had told you that Gena Pyfrom-Foster had given him the formula for the payroll spreadsheets?

A. Had -- yeah, had told him how the formulas should work in that spreadsheet.

Q. And I think you were asked if that was consistent with what the e-mail showed, that she had prepared the payroll spreadsheet -- or she had provided a formula; is that correct?

A. Yes.

Q. But just to be clear, that's not all that she did; right?

A. On this payroll spreadsheet?

Q. Or in the sort of overarching conspiracy, is that all that she did?

A. No.

Q. So she -- she created the 941s; is that right?

A. She created some of the 941s.

Q. And she at one point provided a template for a fake bank account statement; is that right?

A. Yes.

Q. And she was communicating, as we indicated earlier, extensively with Darrell Thomas; is that right?

A. Through WhatsApp and phone calls, yes.

Q. And so on direct I think there were references that Teldrin Foster sent the e-mails from his e-mail addresses; right? And that Darrell Thomas sent the e-mails from his e-mail addresses; right?

A. Can you restate that? I got lost in the question.

Q. Sure.

So on direct when you were describing the e-mails that were sent, right, I think that the phrasing that was used was,

And on this date, for example, Teldrin Foster sent this e-mail; is that right?

A. Okay.

Q. But we don't know who was actually sending the e-mails; isn't that right?

A. We know contextually based on the combination of the WhatsApp messages with the e-mails.

Q. Okay. Were you there when the e-mails were being written?

A. Me personally?

Q. Yes.

A. No.

Q. Okay. Were you there when they were sent?

A. No.

Q. Were you there when the WhatsApp messages were sent?

A. No.

Q. Were you there when they were received?

A. No.

Q. Were you there when they had conversations?

A. No.

Q. Okay. So you don't know who was actually behind the keyboard; isn't that right?

A. I know based on the prior messaging in WhatsApp with Teldrin and Darrell that that continued throughout the PPP time frame, and that those WhatsApp messages tie to the

e-mails that were sent using initially with the teldrin23@icloud.com and the Yahoo, and then eventually was primarily the Teldrin23 iCloud.

Q. You weren't there, right, when the WhatsApp messages were sent?

A. Correct.

Q. You don't know which phone they were in?

A. I don't know which phone they were in.

Q. You don't know who actually typed into whatever device sent them?

A. Correct.

Q. And the same goes for the e-mails?

A. Correct.

Q. In the messages between Gena Pyfrom-Foster and Darrell Thomas, they discuss money; is that right?

A. Yes.

Q. And they discuss how much money would be paid to Gena Pyfrom-Foster; is that right?

A. Yes.

Q. And so on direct or -- you're familiar with the deposit into the Pyfrom Exclusive Consulting account that is the basis of Count 59 in this indictment; correct?

A. Yes.

Q. And so I think on direct you played -- or testified about a clip from Mr. Foster's interview where he -- where you

discuss that deposit; is that right?
A. Yes.
Q. And he said that he had access to Gena's account; is that right?
A. Yes.
Q. But you know that Gena set up the Pyfrom Exclusive Consulting account the day before this deposit was received; is that right?
A. I believe so.
Q. On June 10th of 2020?
A. Sounds right.
Q. And she actually went into a Bank of America, right, to set up that account?
A. Okay.
Q. Is that right?
A. I don't know if she went into the bank to set it up or how she did it, but I think the date is correct.
Q. Okay. And are you aware through your investigation that she had to go in to present an identification?
A. I would assume that she would have to do that.
Q. I'm going to show you what I've marked as Exhibits F45 and F46.

MR. MARSHALL: What was the second one?

MS. WEBSTER: F46.

MR. MARSHALL: Thank you.

BY MS. WEBSTER:

Q. Have you seen these documents before?

A. I believe so.

Q. And where do you believe you've seen them?

A. I'm assuming the Bank of America, this -- the first document, F45, is from the Bank of America subpoena response.

Q. Let me go back for a second.

Do you recall in the messages between Darrell Thomas and Gena Pyfrom-Foster that they exchanged messages about the Pyfrom Exclusive Consulting account?

A. Yes.

Q. Do Exhibits F45 and F46 look like images that were exchanged between those two people?

A. Yes.

Q. And do they appear to be true and accurate copies of the images that were exchanged between Gena Pyfrom-Foster and Darrell Thomas?

A. Yes.

MS. WEBSTER: Your Honor, I move to admit F45 and F46.

MS. CHAIKEN: No objection.

MR. MARSHALL: Judge, can I look at them? I don't have them in my...

MS. WEBSTER: Sorry.

THE COURT: Sure.

MR. MARSHALL: No objection, Judge.

THE COURT: They're admitted.

MS. WEBSTER: Thank you.

BY MS. WEBSTER:

Q. Can you tell me what F45 is?

A. Bank of America account summary information for business Pyfrom Exclusive Consulting.

Q. And so this message or this image was sent from Gena Pyfrom-Foster to Darrell Thomas; is that right?

A. Yes.

Q. And it is for the Pyfrom Exclusive Consulting account; is that right?

A. Yes.

Q. And then if we turn to F46, what is this?

A. A deposit slip.

Q. And is it a deposit slip that Darrell Thomas sent to Gena Pyfrom-Foster on June 11th of 2020?

A. Yes.

Q. So that reflects the $10,560 that was deposited into Gena Pyfrom-Foster's account on June 11th of 2020; is that right?

A. Yes.

Q. And this deposit is the basis for Count 59; is that right?

A. I don't remember the account, but I'm assuming that's the correct account.

Q. Okay. That's the basis for the money laundering charge against Mr. Foster; is that right?

A. Correct.

Q. And then you have reviewed these messages; correct?

A. Yes.

Q. And there was no discussion of this money being for Teldrin Foster?

A. In those messages, no.

Q. Right. There was no discussion where Darrell tells Gena that he's depositing this money for her to give to Teldrin?

A. No.

Q. Gena didn't say, I'm going to make sure I get Teldrin this money?

A. She didn't say that.

Q. And so when they were exchanging pictures and this deposit information, there was no discussion about Teldrin Foster at all having access to these funds?

A. I can't remember if it said in the messages whether or not he got that money.

Q. Would it refresh your recollection to see the messages?

A. Sure.

Q. Okay. It starts on page 61 of those messages.

Is your recollection refreshed?

A. Yes.

Q. Do they discuss Teldrin Foster having access to this

money?

A. No.

Q. Thank you.

This deposit is not the only time that Darrell Thomas paid Gena money; correct?

A. Correct.

Q. I'm going to show you what I have marked as Defendant's Exhibit 47, 49 and 50.

A. Okay.

Q. Have you seen these documents?

A. Yes.

Q. And are these images that were also sent between Gena Pyfrom-Foster and Darrell Thomas?

A. Yes.

Q. And do they appear to be true and accurate copies of images that were exchanged between these two people?

A. Yes.

MS. WEBSTER: Your Honor, I move to admit F47, 49 and 450 -- or sorry. F47, F49 and F50.

MS. CHAIKEN: Your Honor, F49 and F50 are hearsay, we object.

THE COURT: Can you pass those up, please?

MS. WEBSTER: Yes, Your Honor.

THE COURT: Ms. Webster?

MS. WEBSTER: Your Honor, I can get them in -- I

mean, I can get in the same information another way. That's fine.

THE COURT: Very well.

So withdrawn on 49 and 50, and 47 is admitted. Was it 47, 49 and 50 that you were looking to admit?

MS. WEBSTER: Yes, Your Honor.

THE COURT: All right. 47 is admitted. 49 and 50 are withdrawn, Ms. Lee.

MR. MARSHALL: Judge, I'd like to see 47. It's not in my folder.

THE COURT: Sorry, I thought you would have spoken up if you'd had an objection, Mr. Marshall.

MR. MARSHALL: Just waiting for the Court to review.

No objection, Judge.

THE COURT: 47 is admitted.

BY MS. WEBSTER:

Q. Can you see what this is, Agent Stites?

A. That looks like a handful of cash or paper.

Q. Okay. And that is an image that Darrell Thomas sent to Gena Pyfrom-Foster; is that correct?

A. Yes.

Q. And there were discussions about getting this to her; is that right?

A. I believe so.

Q. And there was no discussion about making sure that

Teldrin Foster had access to that money either; correct?

A. No.

MS. WEBSTER: Can we see Government's Exhibit 1146 at page 6.

BY MS. WEBSTER:

Q. This is a bank statement from Elite Executive Services; is that right?

A. Yes.

Q. And on this page you can see a Cash App to someone listed as Teldrin on May 22nd of 2020; is that right?

A. Yes.

Q. Okay. Did you ever get the Cash App records for that account?

A. No.

Q. So we don't know where that money actually went to; is that correct?

A. We know that it went to a Cash App in the name of Teldrin.

Q. Yes, but we don't know if that was associated with a bank account?

A. No.

Q. We don't know who had access to the Cash App account?

A. No.

Q. Can you look in your binder at Exhibits F22A through M, or through I specifically.

A. Okay.
Q. Have you seen these documents before?
A. Yes.
Q. Can you tell me what they appear to be?
A. WhatsApp messages from Gena.
Q. And so the recipient would be Darrell Thomas; is that right?
A. Yes.
Q. And is that for all of F22A through I?
A. Yes.
Q. Do those appear to be fair and accurate copies of those messages?
A. Yes.

MS. WEBSTER: Your Honor, I'm also going to move to admit these pursuant to the residual clause in Rule 807. And it was also noticed to the government.

THE COURT: Can you pass me a copy up so I can look at them, please?

Ms. Chaiken, is there an objection to these?

MS. CHAIKEN: Yes, Your Honor.

THE COURT: I'm sorry?

MS. CHAIKEN: Yes, Your Honor. This is not the type of evidence that's admissible under Rule 807. And given the various statements that the defense has made about Ms. Pyfrom-Foster, they are not sufficient guarantees of

trustworthiness.

THE COURT: Ms. Webster, what's your response to that?

MS. WEBSTER: Your Honor, these messages line up directly with e-mails that were sent from Mr. Foster's e-mail account, and so they will show that the images -- that the statements were sent, which are that the information was sent, which is all the statements that are in Exhibits F22A through I say -- so the exhibits from the WhatsApp account say this document was sent, and then we have the e-mails that correspond in time that confirm that those documents were sent.

And so that is the reliable guarantee of trustworthiness, not just the word of Ms. Pyfrom-Foster that they were sent. And I think that we can establish that.

THE COURT: Ms. Chaiken, do you question whether or not she can line that up?

MS. CHAIKEN: I just don't think this is the type of evidence that's subject to 807. She is offering the messages for the truth of the matter asserted and it's circular to say that they line up because that assumes that what's in the messages is true.

MR. MARSHALL: Defendant Jackson has no objection, Judge, just to let you know.

THE COURT: All right. Well, I don't think 807's a

truth of the matter issue, is it, Ms. Chaiken?

MS. CHAIKEN: It is, Your Honor. It's an exception for matters that are offered for the truth of the matter asserted that otherwise have sufficient guarantees of trustworthiness but don't fall within a recognized hearsay exception.

THE COURT: That's what I'm saying. I mean, I think I said it inartfully, though.

All right, Ms. Webster. Let's see if you can line it up. It sounds like Ms. Chaiken doesn't consent to that.

How much longer do you think you're going to have with this witness before we turn to Mr. Marshall's cross-examination, if he has any?

MS. WEBSTER: This process, lining this up, could take a little while, so --

THE COURT: Other than that, putting that aside, how much more do you have?

MS. WEBSTER: Less than half an hour.

THE COURT: Okay. Go ahead.

MS. CHAIKEN: Your Honor, we'll just withdraw the objection. We don't --

THE COURT: Very well. They're admitted.

Mr. Marshall, did you have any objection? I assumed not?

MR. MARSHALL: No, Your Honor.

THE COURT: All right. They're admitted, Ms. Lee.

BY MS. WEBSTER:

Q. Agent Stites, can you look at F22A for me, please.

A. Yes.

Q. And is this a message that says, Bout to send you the e-mail ones I did today?

A. Yes.

Q. Okay. And was this sent on June 29th, 2020, at 2:42 a.m. UTC time?

A. UTC time, so subtract.

Q. Which would make it sent at what time?

A. Boy. 10:42 p.m. on the 28th.

Q. Okay. Great.

So can you please turn -- or see if the binder that has Exhibits F337 and F338 are --

A. This top binder? Is this the big one?

Q. I'll hand you a redacted version of F337, which I've discussed with the government and with Mr. Marshall in advance.

A. Did you want me to look through each of these or --

Q. Yes, each of those exhibits.

Have you had a chance to look through those documents?

A. Yes.

Q. What do they appear to be?

A. Well, it starts with an e-mail from Teldrin Foster iCloud

to Darrell Thomas on June 28th, 2020, at 11:00 p.m. And it's some attachments of some 941 -- Form 941s for 2019.

Q. Okay. And was this received in response to your subpoena to GoDaddy?

A. Yes.

MS. WEBSTER: Your Honor, I'd move to admit F337 pursuant to the 902.11 certification.

MS. CHAIKEN: No objection.

MR. MARSHALL: No objection.

THE COURT: Admitted.

MS. WEBSTER: Thank you.

BY MS. WEBSTER:

Q. So, again, F22A is a message where Ms. Foster says -- Ms. Pyfrom-Foster says, Bout to send you the e-mails I did today; correct?

(Clarification from the court reporter.)

BY MS. WEBSTER:

Q. Bout to send you the e-mail ones I did today? Yes?

A. Yes.

Q. And that we said was at -- on June 28th at 10:42; is that correct?

A. Yes.

Q. Okay. And then this e-mail was sent at 11:00 on June 28th of 2020; is that correct?

A. Yes.

Q. And this e-mail was sent from teldrin23@icloud.com; correct?

A. Yes.

Q. Not from the Yahoo account; is that right?

A. Correct.

Q. And then the exhibits are the attachments to that e-mail. I'm showing F337A were stamped versions of the 941s; is that correct?

A. Correct.

Q. Is that true for all four of the exhibits that were submitted with that e-mail?

A. Yes.

Q. Now, if you turn in the binder to F336, please.

A. Yes.

Q. You're looking at F336?

A. Oh.

Q. I think that's in the bigger binder. I'm sorry, I think I told you the wrong one. I think it's F338.

A. This one starts at F355. Do you have another binder?

Q. We're looking for F338.

A. This one starts at F355.

Okay.

Q. Okay. And do you recognize these documents?

A. Yes.

Q. Are these documents that you received in response to your

subpoena to GoDaddy?

A. Yes.

Q. GoDaddy?

A. Yes.

Q. And do they appear to be fair and accurate copies of what you received?

A. Yes.

MS. WEBSTER: I move to admit Exhibits F338 and sub exhibits into evidence.

MR. KAUSHAL: Ms. Webster, did you say 338 or are we looking at 336?

MS. WEBSTER: 338.

MS. CHAIKEN: No objection.

MR. MARSHALL: No objection, Judge.

THE COURT: They're admitted.

BY MS. WEBSTER:

Q. So, again, going back to F22A, that was sent on June 28th at 10:42; correct? And she says, I'm about to send you the ones, plural, that I did today?

A. 22B?

Q. 22A. It's on the screen.

A. Oh, the same one?

Q. The same one.

A. Okay. Yes.

Q. Yes. Okay.

And then F338 is sent from the teldrin23@icloud account; correct?

A. Yes.

Q. Not the Yahoo account?

A. Correct.

Q. And it's sent on June 28th at 11:07 p.m.; is that correct?

A. Yes.

Q. And it's sent from the Teldrin23 iCloud account to Darrell Thomas at Bellator Phront Group; is that correct?

A. Yes.

Q. And it has the documents for a company Driving Under Intelligence; correct?

A. Correct.

Q. And that was on the list that we looked at earlier; is that right?

A. Yes.

Q. And if you look at the attachments, these are 941s; correct, and they're stamped?

A. Yes.

Q. And is that true for all four attachments that come with Exhibit -- or with F338?

A. Yes.

MS. WEBSTER: Ms. Holland, can we see Government Exhibit 2400, please.

BY MS. WEBSTER:

Q. Do you remember this exhibit, Agent Stites?

A. Yes.

Q. And that's an e-mail from teldrin23@icloud.com; correct?

A. Correct.

Q. To Darrell Thomas; correct?

A. Yes.

Q. On April the 1st at -- of 2020; correct?

A. Yes.

Q. And that's right after -- right after midnight?

A. 12:08 a.m.

Q. Okay. And what information was sent in the attachment, do you recall?

A. The application, borrower application, a blank one.

Q. So it was information about the PPP loans; correct?

A. Yes.

Q. And you asked Mr. Foster about this in his statement or in his interview; is that right?

A. Yes.

Q. That this e-mail had been sent from his account?

A. Yes.

Q. And are you familiar with an individual named Aleem Rashid?

A. Yes.

Q. Is that someone who is an associate of Darrell Thomas?

A. Yes.
Q. And he was a realtor; is that right?
A. Correct.
Q. But he was also involved in some of the loans; is that correct?
A. Yes.
Q. And when you downloaded Mr. Thomas's phone, there were messages or WhatsApp messages between Darrell Thomas and Aleem Rashid; is that correct?
A. I believe so.
Q. And you reviewed those messages; is that right?
A. I've been through them. I haven't reviewed them recently.
Q. You haven't reviewed them?
A. Recently.
Q. Recently.

But when you got into Mr. Thomas's phone, right, you would have reviewed those; is that right?
A. Yes.
Q. Because at that point you're trying to learn everything you can about the investigation; is that right?
A. Correct.
Q. And you would have taken action based on information that you saw in these messages, is that correct, potentially if it was relevant?

A. Potentially.

Q. I'm going to show you what I've marked as --

THE COURT: Ms. Webster, I've been waiting to see if maybe we could get this one witness's cross-examination done before the break, but it looks like we're pushing an hour and 40 minutes at this point that Ms. Coudriet's been typing. So we're going to go ahead and break now.

Ladies and gentlemen of the jury, you're reminded of your instructions for breaks. We'll take about a ten-minute break.

And, Ms. Webster, are we close?

MS. WEBSTER: I believe so, Your Honor, yeah. Yes. I think Mr. Marshall has already done his cross-examination of --

MR. MARSHALL: Judge, I did my cross, Your Honor.

THE COURT: You're not going to have anything else other than after redirect?

MR. MARSHALL: After redirect, Judge.

THE COURT: All right. Very well.

(After a recess was taken at 2:27 p.m., the proceedings continued at 2:47 p.m. as follows:)

THE COURT: Please bring out the jury.

(The jury entered the courtroom at 2:48 p.m.)

THE COURT: Y'all can be seated. Thank you.

Ms. Webster, you may proceed.

MS. WEBSTER: Thank you, Your Honor.

BY MS. WEBSTER:

Q. Agent Stites, I want to go back to Government's Exhibit 2400.

So, again, this is an e-mail that the government admitted; correct?

A. Yes.

Q. And it's from the teldrin23@icloud account; right?

A. Correct.

Q. On April the 1st of 2020; correct?

A. Yes.

Q. Okay. And so the suggestion is that Teldrin Foster sent this e-mail to Darrell Thomas; is that correct?

A. Yes.

Q. And so we were talking before the break about getting access to Darrell Thomas's phone; is that correct?

A. Yes. And it was about two years after we got these e-mails.

Q. Right. And so -- but if there was information in the phone that would cause you to reevaluate or reexamine some of the information that you believed, would you have done that?

A. Yes.

Q. So if there's information in the phone that contradicts information or your beliefs about Teldrin Foster's involvement, right, then you would have reexamined that; is

that right?
A. Yes.
Q. So I believe -- I'm showing you what I've marked as Defendant's Exhibit F51. I want you to take a look at that and tell me when you're ready.
Do these appear to be messages between Aleem Rashid and Darrell Thomas?
A. Yes.
Q. And are these messages that you reviewed when you -- during your investigation?
A. I don't recall them, but I would have gone through the phone, yes.
Q. Okay. So you might not recall these messages specifically, but you recall that they are messages between Darrell Thomas and Aleem Rashid on Darrell Thomas's phone?
A. Yes.
Q. And you would have reviewed those; correct?
A. Yes.
Q. And you don't have any reason to dispute that these actually came from the phone?
A. No.
MS. WEBSTER: Your Honor, I move to admit Defendant's Exhibit F51.
MS. CHAIKEN: Objection, Your Honor. It's rank hearsay.

MR. MARSHALL: No objection from Ms. Jackson.

THE COURT: All right. Ms. Webster, I think the objection was -- I think there was an adjective, but I think the sum and substance of it was that it was hearsay?

MS. WEBSTER: Yes, Your Honor.

THE COURT: What's your response to that?

MS. WEBSTER: Your Honor, it's not offered for the truth of the matter but to show the effect on the investigation because I believe that the message shows that Mr. Foster was not responsible for this e-mail from April 1st of 2020. And even after that message was reviewed, no -- there was no accounting for the contradictory information during the investigation.

THE COURT: All right. It may be that Ms. Chaiken doesn't have issue with those questions. She had an issue with admitting the document, so go ahead.

MS. CHAIKEN: And saying what it said.

THE COURT: I understand.

Go ahead, Ms. Webster.

MS. WEBSTER: Okay.

BY MS. WEBSTER:

Q. Agent Stites, did you review -- or I believe we established you would have reviewed Exhibit F51 in the course of your investigation; is that right?

A. Yes.

Q. And there's information, particularly I believe at the top of page 2, that suggests that Mr. Foster was not the one that submitted the e-mail that's in Government's Exhibit --

MS. CHAIKEN: Your Honor, objection. That's hearsay.

THE COURT: Ms. Webster, I thought where you were going was that you wanted to ask him if he did anything based on this. Do you want to just give the --

MS. WEBSTER: I'm sorry?

THE COURT: I thought you wanted to ask him if he did anything based on this versus -- you know, the objection was hearsay. And then instead of the document you were just going to -- it looked like you were maybe just quoting the document, which would be the same issue Ms. Chaiken had. So go ahead if you want to ask him if it had an effect, if you want to ask him generally what it was about.

MS. WEBSTER: Okay. You said ask him generally what this document is about; correct?

THE COURT: Yes.

MS. WEBSTER: Okay.

BY MS. WEBSTER:

Q. Agent Stites, can you tell me generally what this document is about?

A. It's basically a conversation between Aleem Rashid and Darrell Thomas over WhatsApp talking about the PPP -- it appears to be the PPP program.

Q. And was there information in that that Mr. Thomas had already received that information?

A. Maybe not that specific information, but it appears that he had received it from somebody else as well.

Q. Okay. And based on this conversation did you take any steps to reevaluate Mr. Foster's involvement?

A. No. We had already interviewed Mr. Foster and we had already had his admissions to the activities that he was involved in.

Q. But a big part of the case against Mr. Foster, would you agree with me, are the e-mails that have been -- that were sent from the teldrin23@icloud.com account?

A. Yes. And also from the Yahoo account earlier on.

Q. Yes. Yes. But also specifically the teldrin23@icloud.com account, yes? That was a big part of the case?

A. Sure.

Q. Okay. Not the -- and I'm not saying it's the only part of the case, but a part of it.

A. Sure.

Q. Okay. And so when you had information suggesting that other people might have had access to the teldrin23@icloud.com account, you did not reconsider Mr. Foster's involvement?

MS. CHAIKEN: Objection. Your Honor, I'm going to move to strike all of these questions that are trying to

back-door in what the message says. It's all hearsay.

THE COURT: Overruled. I think that was about it, wasn't it, Ms. Webster?

MS. WEBSTER: Well, Your Honor, now that I've laid the foundation about the effect on the investigation, I would like to admit the statement to show the effect, or lack thereof, on the investigation.

THE COURT: I think we -- I think this is the same road we were down earlier.

Ms. Chaiken, do you want to state your objection more thoroughly?

MS. CHAIKEN: Your Honor, it's offered to prove the truth of the matter asserted in the statement and to prove effect on the investigation or lack of effect on the investigation. You don't need to admit the statement itself, especially if it didn't have an effect on the investigation.

THE COURT: Anything else, Ms. Webster?

MS. WEBSTER: Your Honor, I can't argue to the jury unless the content -- that there should have been an effect on the investigation without the information in evidence, so...

THE COURT: All right. Well, I thought that's what you just were doing, is going down effect on the listener and went that route instead of trying to admit the document. But you still want to admit the document?

MS. WEBSTER: I am not necessarily -- I would like to

admit the document, but if you're not going to let me admit the document, I would like to admit the statement. And I feel like I've alluded to the statement, but I would like to elicit from the agent what the statement is.

THE COURT: Ms. Chaiken, the objection is the statement is hearsay?

MS. CHAIKEN: Yes. It's offered for the truth of the matter asserted.

THE COURT: All right. Sustained.

BY MS. WEBSTER:

Q. Agent Stites, you're aware through the course of your investigation that, as we've discussed, Gena Pyfrom-Foster and Darrell Thomas were working together to prepare PPP loan applications; is that correct?

A. I'm aware that Gena Pyfrom-Foster, Teldrin Foster and Darrell Thomas were working together to prepare PPP loan documentation.

Q. Okay. Are you telling me that there is -- that you did not learn during your investigation that there were efforts to keep Mr. Foster from knowing about Darrell Thomas and Gena Pyfrom-Foster's involvement?

A. I think there were some aspects of what Ms. Pyfrom-Foster was involved in with Darrell that they were trying to keep from Teldrin but --

Q. Okay. That's the question. All right.

A. Okay.

Q. There are --

MS. CHAIKEN: Your Honor, can the witness finish the answer?

THE COURT: Yes.

Go ahead, Agent Stites.

THE WITNESS: Oh. But we also believe that they also worked together on many aspects of creating the documents that were prepared for the PPP loans.

BY MS. WEBSTER:

Q. Okay. I understand that you think that they all worked together, okay. I am only asking you if there was evidence during your investigation that Darrell Thomas and Gena Pyfrom-Foster were concealing their communications and Gena Pyfrom-Foster's activity from Teldrin Foster?

A. I don't recall any specifics.

Q. So you don't -- you don't recall any messages from Gena Pyfrom-Foster saying, I don't want him to know I talked to you?

A. Okay. I do remember something along that line.

Q. Do you recall messages where Gena Pyfrom-Foster says, He came to the house and I stopped working at that point?

A. Yes.

Q. And that she warned Darrell Thomas when Teldrin would be at home?

A. Okay.
Q. Do you recall those?
A. Yes.
Q. And when there was a delivery of money or some document or some item, she told Darrell Thomas to leave that in a mailbox, that's --

MS. CHAIKEN: Objection, Your Honor. This is all hearsay again.

MS. WEBSTER: That's not a statement offered for the truth of the matter; right? Leave something in the mailbox is not a statement.

THE COURT: Ms. Chaiken.

MS. CHAIKEN: Your Honor, they're all statements about what Gena Pyfrom-Foster said to Darrell Thomas.

THE COURT: Sustained.

BY MS. WEBSTER:

Q. Agent Stites, you've been the case agent on this case since the beginning?
A. I was the case agent to start and then there's been other case agents that have jumped on the case as well.
Q. But you've been here from the very beginning?
A. Yes.
Q. And so you were involved in conducting initial interviews?
A. Yes.

Q. Okay. And as we know, there are multiple loans charged in the indictment; right?

A. Yes.

Q. And the first one was from Bellator Phront Group in April of 2020?

A. Yes.

Q. And the last loan in the indictment was Mikies Auto & Tire, and that was applied for on August 10th of 2020?

A. Correct.

Q. And so your investigation, I believe you testified earlier, began actually all the way back in April?

A. Yes.

Q. And in -- I think we established that Mr. Thomas was indicted on August the 4th of 2020; is that right?

A. That's correct.

Q. And at that time Teldrin Foster was not indicted; is that correct?

A. Correct.

Q. But the investigation obviously continued after Darrell Thomas's indictment; right?

A. Yes.

Q. And you continued gathering documents and e-mails and interviewing witnesses?

A. Yes.

Q. And you interviewed Gena Pyfrom-Foster on December 9th of

2020?

A. Correct.

Q. You interviewed Teldrin Foster on December 10th of 2020?

A. Yes.

Q. And in March of 2021, that's when Mr. Foster received a target letter?

A. I think it was February of '21.

Q. Or February, okay. But in spring of 2021?

A. Yes.

Q. And in August of 2021 is when he was indicted; is that right?

A. Yes.

Q. But your investigation obviously still continued; right?

A. Yes.

Q. And you continued to gather more information?

A. Yes.

Q. And you got access to Darrell Thomas's cellphone in May of 2022; correct?

A. That's correct.

Q. And that's when you got access to his WhatsApp messages for the first time?

A. Yes.

Q. And in those messages you discovered proof of Gena Pyfrom-Foster's involvement?

A. Yes, that's where we started seeing the communications

between Gena and Darrell.

Q. That's when you first saw those direct communications; correct?

A. Yes.

Q. And there were actually 1,800 messages exchanged between them; correct?

A. Yes.

Q. And they began on June 6th of 2020 and ended on or about August 4th of 2020?

A. Sounds right.

Q. And in less than two months they exchanged more messages than Mr. Foster and Darrell Thomas exchanged in more than a year; is that correct?

A. I believe that's accurate for the WhatsApp messages.

Q. You believe that's accurate?

A. For WhatsApp.

Q. For WhatsApp, okay.

And people who were charged in this case, like Mr. Foster, they would not have had access to Darrell Thomas's WhatsApp messages before you did; is that right?

A. True.

Q. And so you broke into the phone -- or the FBI broke into the phone in May of 2022 and eventually that was then disclosed to defendants in this case; is that right?

A. Yes.

Q. And so that would have been the first time for many to actually understand the full depth of communications that Darrell Thomas had with other people; is that right?

A. Yes.

Q. So that may well have been the first time that Teldrin Foster learned of all the communications with Gena Pyfrom-Foster potentially?

A. Potentially.

Q. And even after you received all this information about Gena Pyfrom-Foster's involvement, right, to your knowledge no charges against Mr. Foster have changed; is that right?

A. I don't believe so.

Q. So he faces charges for all of the loans charged in the indictment; is that right?

A. Correct.

Q. And he still faces charges -- the one count of money laundering; is that right?

A. Yes.

Q. And that's specifically for the money deposited into Gena Pyfrom-Foster's Pyfrom Exclusive Consulting bank account?

A. Yes.

Q. So despite the new messages, nothing in terms of the charges that he's facing has changed for Mr. Foster; is that right?

A. Correct.

MS. WEBSTER: Your Honor, may I have one moment?

THE COURT: Certainly.

MS. WEBSTER: Thank you.

Your Honor, during a break Ms. Lee indicated that F40A through E, the clips from the statement on the jump drive, had not been formally admitted, so I would just like to clarify that or move to admit them.

MS. CHAIKEN: No objection.

MR. MARSHALL: No objection, Judge.

THE COURT: They're admitted.

MS. WEBSTER: At this time, we have no further questions for Agent Stites.

THE COURT: All right. Any redirect?

MS. CHAIKEN: Yes, Your Honor. May I have one moment, please?

THE COURT: Sure.

REDIRECT EXAMINATION

BY MS. CHAIKEN:

Q. Good afternoon, Agent Stites.

A. Good afternoon.

Q. Do you recall being asked questions about some names that were on Bellator Phront company documents like Kevin James and Brenda Miller?

A. Yes.

Q. And those were names that Darrell Thomas put there who

were not actually involved with Bellator Phront Group?
A. Yes. Correct.
Q. Did you in your investigation find any evidence of hundreds of e-mails between Brenda Miller or Kevin James and Darrell Thomas?
A. No.
Q. Did you find hundreds of WhatsApp messages between them?
A. No.
Q. Did you find any evidence that Darrell Thomas had hacked into Brenda Miller's e-mail address to make it look like she was involved in Bellator Phront Group?
A. No.
Q. Same thing for Kevin James?
A. No.
Q. Did you find any evidence that he had hacked into their WhatsApp accounts?
A. No.
Q. They were just names that he put on a piece of paper?
A. Yes.
Q. And were you tricked by those names on the piece of paper into thinking that those people had anything to do with PPP loan fraud?
A. No.
Q. In your investigation, did you find any evidence that Darrell Thomas ever hacked into anyone's e-mail account?

A. No.

Q. Did you have Darrell Thomas's cellphone?

A. We did.

Q. Was Teldrin Foster's Yahoo account loaded on to that cellphone?

A. No.

Q. Was his iCloud account loaded on to that cellphone?

A. No.

Q. Was Teldrin Foster's WhatsApp account loaded on to that cellphone?

A. No.

Q. Did Darrell Thomas have any notes or any references in his cellphone to any of Teldrin Foster's passwords or user names or log-in information for any of his information?

A. I didn't see any.

Q. Did he ever send that information to anyone else?

A. No.

MS. CHAIKEN: Could you please publish 2305.

BY MS. CHAIKEN:

Q. So this is a WhatsApp conversation we looked at a few days ago between Darrell Thomas and Teldrin Foster; correct?

A. Yes.

Q. So if Darrell Thomas was controlling this -- if Darrell Thomas was controlling Teldrin Foster's WhatsApp account, who are the two parties to this conversation?

A. If Darrell Thomas was controlling it?

Q. Yes. If Darrell Thomas was using Teldrin Foster's WhatsApp account.

A. Then it would be between Darrell Thomas and Darrell Thomas.

Q. And would this conversation incriminate Teldrin Foster?

A. No.

Q. Well, would it -- given that Teldrin's name is on it, would this conversation suggest that Teldrin Foster was part of it?

A. Yes. Yes.

Q. Would it also incriminate Darrell Thomas?

A. Yes.

Q. If Darrell Thomas had access to Teldrin Foster's WhatsApp account, would Darrell Thomas need to WhatsApp himself?

A. I wouldn't think so.

Q. Now, what if Gena Pyfrom-Foster was the one controlling this WhatsApp account, then this would be a conversation between Gena Pyfrom-Foster and Darrell Thomas?

A. Yes.

Q. And looking at that text message where it says, LOL, I think I have got her to do everything, the payroll taxes and find the loans.

Do you see that?

A. Yes.

Q. Would that be Gena Pyfrom-Foster incriminating herself?
A. Yes.
Q. And later on in this exhibit was there a specific reference to Gena saying, Send Gena your business address?
A. Yes.

MS. CHAIKEN: Could you go to 2345, please.

BY MS. CHAIKEN:

Q. Is this the beginning of the WhatsApp conversation between Gena Pyfrom-Foster and Darrell Thomas?
A. Yes, it is.
Q. And based on this string of WhatsApps, did you determine that Gena Pyfrom-Foster was, in fact, involved in the PPP loan fraud?
A. Yes.
Q. And if Gena Pyfrom-Foster had access to Teldrin Foster's WhatsApp account, would it make sense for her to then all of a sudden start using her own WhatsApp account?
A. No, that wouldn't make sense.
Q. Because this WhatsApp string incriminated Gena Pyfrom-Foster, didn't it?
A. Yes, it did.
Q. And after Gena Pyfrom-Foster started talking to Darrell Thomas, the Teldrin Foster WhatsApp continued to be used?
A. Yes.
Q. And we looked at a lot of those messages on Thursday or

Wednesday? Thursday?

A. Some day. One of the days.

Q. Okay. And a lot of those WhatsApp messages that we looked at where there would be a WhatsApp message to Teldrin Foster and then the iCloud account would send Darrell Thomas documents, those were in June of 2020; correct?

A. Yes.

Q. So that was after Gena Pyfrom-Foster was already communicating with Darrell Thomas?

A. Yes.

Q. And if Gena Pyfrom-Foster wanted to make it look like it was actually Teldrin Foster, she could have used his account if she had access to it; right?

A. Yes.

MS. CHAIKEN: I'm sorry, Your Honor, one moment.

BY MS. CHAIKEN:

Q. Agent Stites, do you have F22A by you?

A. I have a lot up here. A lot.

Yes, I do.

Q. Do you mind if I grab that from you?

Do you remember being shown F22A, which was a message from Gena Pyfrom-Foster to Darrell Thomas that said, Bout to send you the e-mail ones I did today?

A. Yes.

Q. And that was -- with the UTC time conversion, it was

about 10:42 p.m. on June 28th?
A. Yes. That's correct.
Q. And do you remember being shown a couple of e-mails that came in shortly after that from the teldrin23@icloud.com account?
A. Yes.
Q. Do you know whether what Gena Pyfrom-Foster was talking about in this text message was those e-mails from the iCloud account?
A. I don't know.
Q. And do you recall -- let's see.
Do you have --
MS. CHAIKEN: Your Honor, F337 was redacted. And we know what's under the redactions, but Agent Stites doesn't, so we -- we need to be able to have him confirm that it's the same business as the one I'm about to show him, but he doesn't know what the redaction is, so --
THE COURT: It seems like a problem we can solve, doesn't it?
MS. CHAIKEN: Yeah.
THE COURT: Go ahead. I don't hear the defense objecting.
MS. CHAIKEN: It's redacted because of an objection that was made by another defendant.
THE COURT: Well, can we establish that without

showing it to the jury?

MS. CHAIKEN: Sure.

BY MS. CHAIKEN:

Q. Just look at this.

A. (Witness complies.)

Q. Okay. Agent Stites, do you remember being shown Exhibit F337, which was an e-mail from the iCloud account to Darrell Thomas on June 28th at 11:00 p.m.?

A. Yes.

Q. And do you remember the implication being that that was one of the e-mails that Gena Pyfrom-Foster was referring to?

A. Yes.

MS. CHAIKEN: Do we have 4001 available as an exhibit number?

MS. HOLLAND: Yes.

MS. CHAIKEN: It's available? Okay.

BY MS. CHAIKEN:

Q. Without telling us the company name that's on this, can you tell me if this is an e-mail that you received from GoDaddy for the Darrell Thomas Bellator Phront Group account?

A. Yes.

MS. CHAIKEN: Your Honor, I move to admit Government Exhibit 4001, which is currently in unredacted form but will be redacted before it's provided to the jury.

MS. WEBSTER: Can we see it?

No objection. Sorry.

MR. MARSHALL: None, Judge.

THE COURT: All right. So it's admitted, but it's going to be redacted?

MS. CHAIKEN: Yes, Your Honor. I'm going to show it right now with the business name covered.

THE COURT: All right. Very well.

MR. MARSHALL: What's this exhibit number again?

MS. CHAIKEN: 4001.

MR. MARSHALL: Okay.

BY MS. CHAIKEN:

Q. Agent Stites, I'm showing you this document. We're redacting the business name, but you have it in front of you. Is the business name on this document the same business name as what was sent from the iCloud account to Darrell Thomas on June 28th?

A. Yes.

Q. Did this e-mail attach documents -- unstamped documents for that business?

A. Yes.

Q. And was that just a few days earlier before the June 28th e-mail from the iCloud account?

A. Yes.

Q. And it was from the Yahoo account?

A. Yes.

Q. And, again, were you able to match up WhatsApp messages from Gena Pyfrom-Foster to Darrell Thomas with a Yahoo account?

A. Yes.

Q. And is this pattern consistent with what you saw, that the Yahoo account would send unstamped documents and the iCloud account would send stamped documents?

A. Yes.

Q. Okay. And during this time period, were there many documents for many different businesses going back and forth between the Yahoo e-mail, the iCloud e-mail and Darrell Thomas?

A. Yes.

Q. So does the fact that there's an e-mail from the iCloud account to Darrell Thomas shortly after Gena Pyfrom-Foster said she's about to send an e-mail mean it was Gena Pyfrom-Foster sending that e-mail?

A. No.

Q. Do you remember also being shown F338B? Sorry, F338.

A. Yes.

Q. And do you have that one in front of you?

A. I do.

Q. Was that another e-mail from Gena -- I'm sorry -- from the Teldrin iCloud account to Darrell Thomas on June 28th at around 11:07 p.m.?

A. Yes.

Q. And what was the business name on that e-mail?

A. Driving Under Intelligence.

MS. CHAIKEN: Okay. And, Your Honor, I'm going to move to admit Government Exhibit 4002 pursuant to Rule 902.11.

MR. MARSHALL: No objection.

MS. WEBSTER: I have no objection.

MR. MARSHALL: No objection, Judge. Sorry.

THE COURT: It's admitted.

MS. CHAIKEN: Thank you, Your Honor.

BY MS. CHAIKEN:

Q. This is Government Exhibit 4002. Is this an e-mail on June 27th of 2020 from the Yahoo account to Darrell Thomas?

A. Yes.

Q. And does it include and attach unstamped documents for Driving Under Intelligence?

A. Yes.

Q. Okay. So is this the same pattern where the Yahoo account sends unstamped documents and then the iCloud account sends stamped documents?

A. Yes.

MS. CHAIKEN: Your Honor, I'm going to move to admit Government Exhibit 4003 pursuant to Rule 902.11 as well.

MS. WEBSTER: No objection.

MR. MARSHALL: No objection, Judge.

THE COURT: It's admitted.

BY MS. CHAIKEN:

Q. Is this an e-mail on June 29th at 1:47 a.m. from the Yahoo account to Darrell Thomas?

A. Yes.

Q. And is that shortly after that text message or WhatsApp message that Gena Pyfrom-Foster sent to Darrell Thomas?

A. Yes.

Q. Okay. Where she said she was sending documents?

A. Yes.

Q. And do you know whether this is the document she could have been referring to?

A. I don't know.

Q. Because she didn't say in that message what she was sending; right?

A. No.

Q. Okay. So you would just be speculating to say that she sent any specific business document at that time?

A. Correct.

Q. Did you ever in your review of the 1,800 messages between Darrell Thomas and Gena Pyfrom-Foster ever see Darrell Thomas instruct Gena Pyfrom-Foster to stamp documents?

A. No, I don't believe so.

Q. Did you ever see her saying that she was stamping documents?

A. No.

Q. Do you remember being shown this document, which is Defense Exhibit F21, that Gena Pyfrom-Foster sent to Darrell Thomas?

A. Yes.

Q. So, first of all, was Transportation Management Services on this list?

A. No.

Q. Was that one of the loan applications that was completed in May of 2020?

A. Yes.

Q. Was Gaines Reservation & Travel on this list?

A. No.

Q. Was that a loan application that was completed in May of 2020?

A. Yes.

Q. Was Lee Operations on this list?

A. No.

Q. Was that a loan application that was completed in May of 2020?

A. Yes.

Q. Was Impact Creations on this list?

A. No.

Q. Was that a loan application that was completed in May of 2020?

A. Yes.
Q. Do you recall there also being earlier versions of this list of completed consulting contracts?
A. Yes, I think there were.
Q. And do you recall that there were various iterations that Gena Pyfrom-Foster sent to Darrell Thomas where she would say the ones she had done and the ones she had left?
A. Correct.
Q. And did all of those start after Gena Pyfrom-Foster started talking to Darrell Thomas in June of 2020?
A. The messages?
Q. The notes of what --
A. Yes.
Q. -- contracts had been completed?
A. Correct. Correct.
Q. And so do you remember being shown some e-mails of documents that were being sent to the iCloud account back in May of 2020?
A. Yes.
Q. At that point in time was Gena Pyfrom-Foster sending Darrell Thomas any notes with contracts she had completed?
A. No.
Q. And based on the iterations of the notes that she was sending to him, was she working on all of those in June of 2020?

A. Yes.

Q. And is that consistent with what we looked at last week, where Teldrin Foster prepared identical documents for lots and lots and lots of businesses and then Gena Pyfrom-Foster came in in June and fixed them?

A. Yes. She got -- put in different numbers so it wasn't the same numbers over and over and over again.

MS. CHAIKEN: Could you go to Government Exhibit 2300, page 234, please.

BY MS. CHAIKEN:

Q. And looking down at the message at the bottom there, do you see where Teldrin Foster said, Can you send Continuing Success, Inc., Regional and G. Power?

A. Yes.

Q. And that was May 6th of 2020?

A. Yes.

Q. And did Ms. Webster show you e-mails from May 7th of 2020 where Darrell Thomas sent some of these business documents to the iCloud account?

A. Yes.

MS. CHAIKEN: If you could go to 237, please.

BY MS. CHAIKEN:

Q. Do you see there on May 7th -- actually May 6th, late night with the UTC conversion, where Teldrin Foster said, Send T. White, Direct Logistic, Linda Hair.

A. Yes.
Q. Was that the same day that Darrell Thomas e-mailed the iCloud account?
A. Yes.
Q. Did you find any evidence in Gena Pyfrom-Foster's messages that she completed these consulting projects in May of 2020?
A. No.
Q. Did you find that Teldrin Foster, Teldrin's iCloud account had prepared identical documents for these businesses?
A. Yes.

MS. CHAIKEN: Could you go to 249, please.

BY MS. CHAIKEN:
Q. Is this a list of businesses that Darrell Thomas sent to Teldrin Foster via WhatsApp?
A. Yes.
Q. And if you can scroll down. Are these many of the same businesses that were on the list of Gena Pyfrom-Foster's completed consulting contracts?
A. Yes.
Q. And this was in May of 2020?
A. Yes.
Q. So after these messages were sent, did you see Teldrin Foster prepare identical documentation for all of these businesses?

A. Yes.

MS. WEBSTER: Objection to referring to seeing Teldrin Foster do anything. He did not witness Mr. Foster see or do anything.

THE COURT: Do you want to restate the question, Ms. Chaiken?

MS. CHAIKEN: Sure.

BY MS. CHAIKEN:

Q. Around this time frame in May of 2020, did you see the teldrin23@icloud.com account creating identical documents for many of these businesses?

A. Yes.

Q. And then when Gena Pyfrom-Foster started talking directly to Darrell Thomas in June of 2020, did those numbers start to change on the documents?

A. Yes, they were redone with some new numbers.

Q. Do you recall being asked questions by Ms. Webster about some proffer interviews that you did with people in this case?

A. Yes.

Q. Do you remember if she asked you if the proffer interviews are prearranged ahead of time?

A. Yes.

Q. Was your interview with Mr. Foster prearranged with him ahead of time?

A. It was scheduled, yes.

Q. And he arrived when you scheduled it?

A. He arrived early.

Q. And was he required to come speak to you?

A. No.

Q. Was he in custody?

A. Nope.

Q. After the interview ended, did you arrest him?

A. No.

Q. What happened?

A. He got in his car and left.

Q. Was he entitled to bring an attorney with him if he wanted to?

A. Sure.

Q. Was he entitled to stop talking to you and leave any time he wanted to?

A. Sure.

Q. Do you remember also being asked about people who in their proffer interviews mentioned Teldrin Foster?

A. Yes.

Q. Did you rely on what those people told you about Teldrin Foster?

A. No.

Q. Did you believe them?

A. No.

Q. Did you determine independently of what those people said

what Mr. Foster's involvement was?

A. Yes.

MS. CHAIKEN: Could you please publish Government Exhibit 2954.

BY MS. CHAIKEN:

Q. Do you remember being asked some questions about the rapid! PayCard spreadsheet?

A. Yes.

MS. CHAIKEN: And if you could go down to line 51, please. And if you could just kind of highlight it.

BY MS. CHAIKEN:

Q. What was listed as the address for the Teldrin Foster rapid! PayCard?

A. 911 Georgetown Street, Clemson, South Carolina 29631.

Q. What was listed as the date of birth?

A. 8/5 of '81.

Q. And in the column next to that what was listed as the social security number?

A. 346-04-2822.

Q. And what was listed as the activation date in the column all the way to the right?

A. 7/11 of 2020.

MS. CHAIKEN: Could you please publish Government Exhibit 2300, page 417. Could you pull out that top message, please.

BY MS. CHAIKEN:

Q. Is this a message from Teldrin Foster to Darrell Thomas on WhatsApp?

A. Yes.

Q. And what was the date of that message?

A. 7/11 of 2020.

Q. And with the UTC conversion, is it actually the night before, the night of July 10th?

A. Yes. Correct.

Q. And did Teldrin Foster write Teldrin Foster?

A. Yes.

Q. And was there a date of birth listed?

A. 8/5 of '81.

Q. Is that the same one that ended up on the rapid! PayCard spreadsheet?

A. Yes.

Q. Was there a social security number listed?

A. Yes.

Q. Was it the same social security number that ended up on the rapid! PayCard spreadsheet?

A. Yes.

Q. Was there an address listed?

A. Yes.

Q. Was it the same address that ended up on the rapid! PayCard spreadsheet?

A. Yes.

Q. And Teldrin Foster sent this information the night before the card was activated?

A. Yes.

Q. And at this time in July of 2020 was this a time frame that Gena Pyfrom-Foster was already separately communicating with Darrell Thomas?

A. Yes.

Q. Do you remember on Friday when Special Agent Berni testified about the cell site analysis?

A. Yes.

Q. And do you remember there being questions about there being a difference of about an hour, of exactly an hour in the times that he used and the times that were on the spreadsheet?

A. Yes.

Q. Earlier in your investigation had you reached out to MetaBank to find out what time zone their records were kept in?

A. Yes, I did.

Q. And based on that conversation what did you do with the records before they were given to Agent Berni?

A. We found out that the time zone for the records was Central Time Zone. So the analyst that was going through the transactions preparing the spreadsheet for Agent Berni converted the Central Time Zone to Eastern Time Zone.

Q. Do you remember there also being some questions about reconciliation transactions in the rapid! PayCard chart?

A. Yes.

Q. Can you just explain to the jury what exactly that means?

A. For certain transactions, an example is if you're at a restaurant and you get your bill and they -- you give your credit card, they go and they -- the restaurant will swipe the card and get an authorization. So there's, like, a point-of-sale preauthorization transaction that hits the credit card. Then you get your receipt back and you put on your tip, and then there's like a -- adding the tip in, get a final price that gets charged to the card.

Well, in the debit card, the preauthorization is that initial swipe, and then once they process the -- process the ticket with the tip and the final charge, it does a reversal of the preauthorization and then it charges the final charge.

So on several of the transactions for the rapid! PayCard, there would be a preauthorization, a point-of-sale preauthorization, a point-of-sale reconciliation which reverses it, and then there is a final charge that hits that card. And a lot of times that final -- that reconciliation and that final charge can occur, you know, hours later or even days later. We saw some instances where it was a couple days, some instances it was just later that evening. But the initial authorization is where you can be assured that the

cardholder was in the restaurant or the place of business.
Q. So in the transactions that were given to Agent Berni to analyze, were some of those transactions ones that actually were these reconciliation type of transactions?
A. Yes. They were sometimes a reconciliation or the final charge and not the preauthorizations. That's when you could say that the cardholder was at the -- in the establishment.
Q. So when there were references on Friday to errors in Agent Berni's analysis, was that a reference to times of transactions that he analyzed where the cardholder wasn't actually there?
A. Right. Correct.
Q. In early July of 2020 did you serve a subpoena on Bellator Phront Group for records?
A. Yes.
Q. And did you ask Bellator for records related to its employees?
A. Yes.
MS. CHAIKEN: Could you please publish Government Exhibit 2300, page 414.
BY MS. CHAIKEN:
Q. And do you see at the top Darrell Thomas sent a WhatsApp message to Teldrin that said they sent new papers, all the accounts got hit?
A. Yes.

Q. Was this around the time that you were seeking records from Bellator Phront Group?

A. Yes.

Q. And you had seized money from various accounts that Darrell Thomas controlled?

A. Yes.

MS. CHAIKEN: Could you go to -- is 2340 in?

BY MS. CHAIKEN:

Q. Agent Stites, do you have Government Exhibits 2340 and 2341 in front of you?

A. 23?

Q. 2340 and 2341.

A. These are 3000.

Here they are.

Q. Do you recognize those exhibits?

A. Yes.

Q. Are those excerpts of WhatsApp messages between Darrell Thomas and Teldrin Foster from the Cellebrite extraction?

A. Yes, they are.

MS. CHAIKEN: Your Honor, I move to admit Government's Exhibits 2340 and 2341 and the sub exhibits to those.

MR. MARSHALL: No objection.

MS. WEBSTER: No objection.

THE COURT: They're admitted.

MS. CHAIKEN: Thank you.

Could you please publish 2340 and 2340A.

BY MS. CHAIKEN:

Q. Up at the top there did Darrell Thomas send Teldrin Foster a document?

A. Yes.

Q. And what was the attachment and what was the document?

A. A W-4 employee withholding certificate for 2020.

Q. And had the subpoena to Bellator Phront Group requested documents related to employees of Bellator Phront Group?

A. Yes.

Q. Would that include things like Form W-4s for employees?

A. Yes.

MS. CHAIKEN: Could you please go to 2300, page 435.

BY MS. CHAIKEN:

Q. And looking down at the last message, do you see that Darrell Thomas sent Teldrin Foster a Google spreadsheet?

A. Yes.

MS. CHAIKEN: If you could scroll down to the next page, please, Ms. Holland.

BY MS. CHAIKEN:

Q. What did Darrell Thomas say when he sent that message?

A. When you get employees add them in here.

Q. Do you remember being asked some questions by Ms. Webster about whether Gena Pyfrom-Foster helped Darrell Thomas get

records together for the subpoena response?
A. Yes.
Q. And did Teldrin Foster also work with Darrell Thomas to try to get records related to the subpoena response?
A. Yes.
MS. CHAIKEN: If you could go to 2341, please.
BY MS. CHAIKEN:
Q. Do you see at the top where Darrell Thomas sent Teldrin Foster an image?
A. Yes.
Q. And what did he say when he sent that image?
A. Need all socials for this info you put in.
MS. CHAIKEN: And if you could -- if you could scroll down, Ms. Holland.
BY MS. CHAIKEN:
Q. Were there several images that Darrell Thomas sent to Teldrin Foster?
A. Yes.
MS. CHAIKEN: If you could publish Government Exhibit 2341A, please.
BY MS. CHAIKEN:
Q. Was this one of the attachments?
A. Yes.
Q. What was that attachment?
A. It's a QuickBooks listing of employees that shows the

name, the pay rate, pay method and then status.

Q. And are these all names that ended up on payroll spreadsheets for Bellator?

A. Yes.

Q. And is the name Utwuan Cooper on there?

A. Yes.

Q. And did Teldrin Foster tell you that was his friend?

A. Yes.

Q. And Darrell Thomas was asking Teldrin Foster to put socials in for those people?

A. Yes.

Q. Do you remember being asked on Thursday if you had reviewed Telegram messages on Darrell Thomas's phone?

A. Yes.

Q. Could you please review Government Exhibit 4000 in the binder in front of you and tell me if you recognize what it is?

A. Ms. Chaiken, what exhibit?

Q. 4000.

Do you recognize Government Exhibit 4000?

A. Yes.

Q. What is that document?

A. This is a Telegram message between Darrell Thomas and TeleTed.

Q. And did -- does that exhibit refresh your memory that you

did review Telegram messages on Darrell Thomas's phone?
A. Yes.
Q. Is Government Exhibit 4000 a report that you generated from the Cellebrite extraction of Darrell Thomas's phone?
A. Yes.

MS. CHAIKEN: Your Honor, I move to admit Government Exhibit 4000.

MS. WEBSTER: Objection, Your Honor. This is -- this is a different phone number that is not associated with Mr. Foster. And it does not list Teldrin. So I don't think there's a basis for concluding that it meets the hearsay exception.

THE COURT: Ms. Chaiken, I guess the issue is the phone number?

BY MS. CHAIKEN:
Q. Agent Stites, do Telegram accounts use phone numbers?
A. No.
Q. On that -- on Exhibit 4000, is there a number listed next to Darrell Thomas?
A. Yes.
Q. Is it the same phone number as the phone number for his phone?
A. No.
Q. What kind of number is it?
A. Just like a Telegram ID.

Q. And who is the conversation with?
A. TeleTed.
Q. And is "Tele" like the beginning of Telegram?
A. Yes.
Q. And the second part is "Ted"?
A. Yes.
Q. Did Teldrin Foster tell you anything about the name Ted?
A. Yes. That's a name that he goes by in some circles.
Q. That's one of his nicknames?
A. Yes.
Q. Did he tell you why people call him Ted?
A. Yes.
Q. Why?
A. He said he had it tattooed on his neck.

MS. CHAIKEN: Your Honor, I move to admit Government Exhibit 4000.

THE COURT: Any further objection, Ms. Webster?

MS. WEBSTER: Yes, Your Honor. They haven't established that this actually belongs to Teldrin Foster.

THE COURT: Anything else?

MS. WEBSTER: I've never seen this before. So I maintain an objection to not seeing this before.

THE COURT: I'm sorry, can you speak up? You're trailing there.

MS. WEBSTER: I've never seen this document before or

messages between Mr. -- and I've specifically looked for Telegram messages and have not seen this before. So I object on that basis and in addition to the foundation not being laid that it actually belongs to Teldrin Foster.

THE COURT: Okay. Overruled as to foundation. I think Ms. Chaiken has established that.

Mr. Marshall, I assume you didn't have an objection?

MR. MARSHALL: No objection, Judge.

THE COURT: All right. And as far as when you'd seen the document, Ms. Chaiken?

MS. CHAIKEN: Your Honor, this was produced with the phone extraction. It's part of the complete phone extraction that was produced back in 2020. They've had it for almost two years now.

THE COURT: All right. Anything else, Ms. Webster?

MS. WEBSTER: No.

THE COURT: Overruled. It's admitted.

MS. CHAIKEN: Could you please publish Government Exhibit 4000.

BY MS. CHAIKEN:

Q. And is this a Telegram conversation between TeleTed and Darrell Thomas?

A. Yes, it is.

Q. And those numbers at the top, what do you understand those numbers to be?

A. Identification numbers for the Telegram application.

Q. And on -- if you could go to page 5, please. What did Darrell Thomas say on July 20th of 2020?

A. Need signed W-4 from each.

Q. And is the W-4 form the same thing that Darrell Thomas had sent to Teldrin Foster via WhatsApp?

A. Yes.

Q. And then what did Teldrin Foster say?

A. Dude them fir my card.

Q. What was the next message after that?

A. They will sign W-4 for that 1,000.

Q. And what did Darrell Thomas say?

A. Don't matter, 1K is fine.

Q. So these were people who were going to sign W-4 forms in exchange for a thousand dollars?

A. Yes.

Q. And was this right around the time period that Bellator Phront Group was collecting documents in response to the subpoena?

A. Yes.

MS. CHAIKEN: If you could go to the next page, please.

BY MS. CHAIKEN:

Q. What was Teldrin Foster's message there at the beginning, the first message on the page?

A. My sure we on da same page. The 1K is what you paying them for employment. The card is for me to collect my percentage.

MS. CHAIKEN: And if you could stay on that, Ms. Holland, please.

BY MS. CHAIKEN:

Q. Did Mr. Foster refer to the card?

A. Yes.

Q. And July 20th of 2020, was this after the rapid! PayCard in Teldrin Foster's name had been created?

A. Yes.

Q. And, by the way, you recall being asked some questions about rapid! PayCards that were seized from Darrell Thomas at his house?

A. Yes. Yes.

Q. Was one of those cards the Teldrin Foster card?

A. No.

Q. And what did Teldrin Foster say the card is for?

A. It's for him to collect his percentage.

Q. Did he say it's for him to get back his retirement money?

A. No.

Q. Did he say it's for him to get back the money that Darrell Thomas owes him because he hustled him?

A. No.

Q. It says to collect my percentage?

A. Yes.

Q. And then what did Darrell Thomas say after that?

A. Yeah, we are.

MS. CHAIKEN: And then if you could scroll down, please, to the next page. Down at the bottom, can you pull out the last two messages, please.

BY MS. CHAIKEN:

Q. What did Darrell Thomas say?

A. You acting like a bitch real talk. I need the ID and pics for the fed shit but you talkin bout money. If something happened to me, all that shit stop, remember that. You ain't going to have shit to argue about.

Q. And what did Teldrin Foster say?

A. Dude I'm act like a bitch, okay, cool because that how you trying me.

MS. CHAIKEN: If we could go to the next page, please.

BY MS. CHAIKEN:

Q. If you could just read the conversation on this page, please.

A. Just know you're being very disrespectful.

And then Darrell Thomas said, Nah, fuck you, I got fed shit but you ain't trying to see about shit. Good to know. You already came with that energy. You talk too much shit.

And Teldrin Foster said, Okay, so what you saying?

Darrell Thomas said, Fuck it, bro. Enjoy that change, whatever happens, all good.

Teldrin Foster said, Remember, trust me, you're not in full control.

MS. CHAIKEN: If you could go down to the next page, please.

BY MS. CHAIKEN:

Q. What was Teldrin Foster's first message on this next page?

A. Okay. So what you're saying is fuck my percentage and da people on my end, right?

Q. So, again, he was referring to his percentage?

A. Right.

Q. And the people on his end?

A. The people on his end.

Q. And throughout the rest of this conversation were Darrell Thomas and Teldrin Foster talking about money?

A. Yes.

MS. CHAIKEN: And if you can scroll down to the next page, please, Ms. Holland.

BY MS. CHAIKEN:

Q. Was the last message between them on July 24th of 2020?

A. Yes.

Q. And does that also correspond to the last WhatsApp message between Teldrin Foster and Darrell Thomas?

A. Yes.

Q. And in your chart that you made of their communications, is that the last call or message -- is that the last call between them on WhatsApp as well?

A. Yes, I believe so.

Q. So around July 24th of 2020 did they fall out?

A. Yes.

Q. And during this time period, including after July 24th of 2020, did Gena Pyfrom-Foster and Darrell Thomas continue talking?

A. Yes.

MS. CHAIKEN: May I have one moment, Your Honor?

THE COURT: Yes.

MS. CHAIKEN: Thank you.

BY MS. CHAIKEN:

Q. Agent Stites, let's switch gears and talk about Ms. Jackson, okay?

A. Okay.

Q. Do you remember Mr. Marshall asking you about digital evidence that you collected in this case?

A. Yes.

Q. And he confirmed with you that you didn't get a search warrant for any of Ms. Jackson's devices, like her cellphone or her computer?

A. Yes.

Q. And, by the way, I just want to clarify something. You were asked a lot of questions about whether you subpoenaed e-mail records. Do you remember those questions?

A. Yes.

Q. Can you obtain the content of e-mails like we've been looking at through a subpoena?

A. No.

Q. What do you need to do in order to get e-mails?

A. You need a search warrant.

Q. So you can't just send a subpoena to whoever you want to get whatever e-mails you want?

A. That's correct.

Q. Now, so you were -- you did not get a search warrant for any of Ms. Jackson's devices; correct?

A. No.

Q. Do you recall testifying that you issued a subpoena to Management Resource Services?

A. Yes.

Q. And did that subpoena to Management Resource Services ask Management Resource Services to produce other documents or papers related to financial transactions of the company?

A. Yes.

Q. So whatever records Ms. Jackson may have had on her cellphone or her computer or a tablet or any other electronic device, if it was related to financial transactions of

Management Resource Services, was she supposed to provide them pursuant to the subpoena?

A. Yes.

Q. Did the subpoena also ask Management Resource Services to produce all communications with Gaines Reservation & Travel?

A. Yes.

Q. And so whatever records Ms. Jackson may have had on her devices, her cellphone, her laptop, her computer, anything that were communications with anyone from Gaines Reservation & Travel, was she supposed to produce those in response to the subpoena?

A. Yes.

Q. Do you remember being asked about the proposal that Ms. Jackson told you that she had that she had presented to Gaines Reservation & Travel?

A. Yes.

Q. Is a proposal that relates to $335,000 worth of payments a document that's related to a financial transaction of the company?

A. Yes.

Q. And is a proposal that's presented to Gaines Reservation & Travel a communication with Gaines Reservation & Travel?

A. Yes.

Q. And did Ms. Jackson or an attorney ever call to tell you

that they had the proposal but they didn't think it was covered by the subpoena so that's why they weren't producing it?

A. Not that I'm aware of.

Q. Do you remember being asked questions about Roadrunner Automotive Group?

A. Yes.

Q. And that was the business that received about $71,000 from Bellator Phront Group?

A. That's correct.

Q. And at the time that the bank account received that amount, Carla Jackson was the only one on that account?

A. Yes. That's correct.

Q. And do you remember that Mr. Marshall showed you the articles of organization for Roadrunner Automotive Group?

A. Yes.

Q. And he was asking you about Mr. Gaines being associated with Roadrunner from the very beginning?

A. Yes.

Q. Was Ms. Jackson also associated with Roadrunner from the very beginning?

A. Yes.

Q. Was she listed as the organizer of Roadrunner on the articles of organization?

A. I don't recall what -- how she was listed.

Q. Would it refresh your recollection if I showed you the document?

A. Yes, it would. It would.

Yes, that is correct. Both -- the two organizers are Carla Jackson and John Gaines.

Q. Okay. So she was also involved with that business from the very beginning?

A. Yes.

MS. CHAIKEN: May I have one moment, please, Your Honor?

THE COURT: Sure.

MS. CHAIKEN: Thank you.

Nothing further, Your Honor. Thank you.

THE COURT: Any redirect?

MS. WEBSTER: We do, Your Honor. I think Mr. Marshall went first, so...

RECROSS-EXAMINATION

BY MR. MARSHALL:

Q. Agent Stites, there were some questions about whether a search warrant was obtained in this case. Remember those from Ms. Chaiken just a minute ago?

A. Yes.

Q. Okay. Now, a search warrant is an option for you to pursue if you want to present an affidavit and an application to a judge to see if there's probable cause for issuance of a

search warrant; right?
A. Yes.
Q. You have this investigation. You believe that there was evidence of money laundering in this case; correct?
A. Yes.
Q. Did you feel that you didn't have sufficient probable cause to seek a search warrant for things like devices and materials like that or e-mail communications?
A. No. We chose to go the business subpoena route on -- in Ms. Jackson's case.
Q. Curious, did you do that with the laptop of Mr. Darrell Thomas?
A. No. We had a search warrant for his whole house. The laptop was included as part of that search warrant.
Q. But it would be fair to say the information you got from Darrell Thomas's laptop was valuable to your case; correct?
A. Yes.
Q. Okay. If you had actually gotten a search warrant possibly for Ms. Jackson's devices or her house, could that possibly have turned up important information for your case?
A. I don't know.
Q. And that's because?
A. We decided to do a business subpoena and a knock-and-talk interview on Ms. Jackson, as well as subpoena all the bank records and trace the money from the bank -- from the PPP loan

at Gaines Reservation & Travel in and out of her accounts.

Q. Okay. But answer my question.

You never obtained a search warrant to search any of those devices; correct?

A. None of Ms. Jackson's devices.

Q. When you were over at Ms. Jackson's residence, when you just showed up, did you even ask Ms. Jackson if you could inspect her devices?

A. No.

Q. And, remember, I think you answered on that first visit there was no mention -- you didn't believe she was represented by a -- well, she wasn't represented by an attorney, correct, during that first visit on July 7th, 2020?

A. At the end of the visit she said that she had a couple attorneys she was going to reach out to. And that's when we stopped the conversation.

Q. Do you happen to recall -- do you know how long that recording was that we listened to?

A. I think it was like 13 minutes.

Q. Right. Do you happen to recall -- or would you disagree with me that the first time the word "attorney" came up in that recording was about the 12-minute mark?

A. That's probably accurate.

Q. So you never even mentioned anything about maybe Ms. Jackson talking to an attorney, maybe seeking an attorney

before she continued answering questions for you; correct?
A. No. Ms. Jackson was not in custody.
Q. All right. I'm going to ask you more questions about that in a minute, though.
But as far as the devices, you never did go ahead and try to seek a -- you didn't go get a court order for them, right, for any of her devices?
A. No.
Q. And you were there and for 12 minutes of that conversation you never asked Ms. Jackson if you could look at her devices or see if she would consent to a search of a laptop or desktop or a cellphone, did you?
A. No. We felt that the business subpoena would get us the records that she was referring to when we were talking to her about the money coming into her account.
MR. MARSHALL: And I don't recall, Ms. Chaiken, if you have the grand jury subpoena in evidence?
Okay. All right.
BY MR. MARSHALL:
Q. There were some questions for you about this grand jury subpoena. We don't have that in front of us, do we? It's not in the record; correct?
A. No.
Q. There's some questions about the actual -- if I give you an opportunity to review what I have for that to refresh your

recollection, would that be helpful?

A. Sure.

Q. Did you get a chance to look at it?

A. Did you want me to look at all the pages of it? This is the return; right? This is the --

Q. It is.

A. Okay.

Q. So if you could look at the subpoena portion, the records that are being requested, because I think Ms. Chaiken made some reference to documents and things of that nature.

A. I need to move some of these binders, I'm sorry.

So Section 5, which is production requests?

Q. Right. Now, don't read it out, but just review what's in that document, okay, as far as the request.

A. Okay.

Q. Did you get a chance to review what's there?

A. Yes.

Q. Can I look at it again briefly?

A. Sure. Can we share it?

Q. Sure.

A. Okay.

Q. Sounds good. All right.

We can't read it, but there are some references to some records and books and documents and financial information and things like that in one of the production requests. Does that

refresh your recollection?
A. Yes.
Q. Is there any mention in there about digital devices or computers, laptops or cell phones?
A. No.
Q. The second request that's listed there that's referenced here, is there any reference to digital devices at all?
A. No.
Q. What about the next section here. We can't read it out, but is there any request here for any kind of digital devices, anything like that?
A. Not specifically digital. All of these are documents that would more than likely be found on a digital device, but there's no reference to a digital device. We're not requesting in the subpoena to have Ms. Jackson send in digital devices.
Q. Right. But is there any direction here that if any of these devices are in there, she needs to -- excuse me.

Does this indicate anywhere in here that Ms. Jackson or somebody that's the subject of a subpoena has to print out text messages on their cellphone, anything like that?
A. If the text messages are in relation to communications with the individuals that were listed in the next section or any of these items that are listed in the production request, then I would say yes.

Q. And would you agree with me that the next page of this document, we won't read it out loud, but are there any references anywhere on this page or the next page about digital devices or cell phones, laptops, anything like that?

A. No.

Q. And in this particular document that you just reviewed and now I'm looking at with you, part of this document has a subpoena on the front, kind of like a cover page?

A. Yes.

Q. And the attachment that references the request, the pages are numbered, correct, at the bottom of the pages?

A. Yes.

Q. What do you notice between this page here and the following page, if you look at the page numbers?

A. This page is page 1 and then the next page is page 4.

Q. Do you know where pages 2 and 3 are?

A. That is the response we got. So I'd have to look at the original subpoena that was delivered.

Q. Did you ever -- is this document what you believe you received from Ms. Jackson?

A. I believe that is the document that came to the US Attorney's Office.

Q. So did anyone ever follow up with Ms. Jackson and say, you know there's a missing page 2 and 3, to see if maybe you didn't give the pages to her or she omitted them?

A. I'm not aware of that.

Q. Did you ever look at this when you got it back?

A. Yes, I looked at the response of items.

MS. CHAIKEN: Your Honor, I think Mr. Marshall is asking about something that's been marked as a defense exhibit, but we have the complete response in front of us. So I'm not sure what he's showing the witness.

MR. MARSHALL: Sure. I was showing him part of the subpoena with the actual document requests. I'll show you here. It's in the attachment, all of this. That was part of the subpoena. And it goes from page 1, jumps to page 4.

(Off-the-record discussion between counsel.)

BY MR. MARSHALL:

Q. Is this the first time today in court that you realized that there were missing pages in an official subpoena that you issued to Ms. Jackson in this case?

A. That is missing pages in a response. I don't -- I'd have to look at the actual -- the official subpoena that was served.

Q. So wouldn't you review a subpoena response that you got from a party that you were interested in?

A. I would have reviewed the responsive items, not re-review the actual subpoena itself.

Q. At least from this, if two pages are missing, we don't know what additional things were being requested or what was

being defined or explained to somebody that had to answer a subpoena --

A. Again, those are two pages missing in the subpoena response, which is Ms. Jackson's response to the subpoena that was served.

Q. But you can't even tell today that the missing pages were -- that the grand jury subpoena and the attachment that you provided to Ms. Jackson on that day was incomplete?

A. I'd have to look at the actual subpoena that was served, a copy of the subpoena that was served.

Q. Okay. Because we know she's responded to the subpoena; correct?

A. Correct.

Q. And there were two missing pages; correct?

A. In her response.

Q. And you didn't know that until today?

A. I did not.

Q. And we're in the middle of trial --

A. We are.

Q. -- correct? Okay.

Some questions were asked -- these were general questions from Ms. Chaiken about proffer agreements and about parties that have been -- you did proffer meetings and interviews with. Do you recall that?

A. Yes.

Q. So most of these proffer meetings -- I guess in Mr. Foster's case you actually called him, is that how it worked?

A. He actually called us and then we scheduled the interview the following day.

Q. Let's contrast that.

Now, that didn't happen with Ms. Jackson, did it?

A. No.

Q. In fact, you didn't call her and tell her who you were; right?

A. No.

Q. You just showed up at her house; right?

A. Yes.

Q. When you showed up at her house, you knew that she was in business meetings, she had calls and things like that. She told you that; correct?

A. When Ms. Jackson answered the door, she said she had some back-to-back calls and her next call was at 10:00. We got there at 9:40, so she was going to give us a few minutes. And I think we even made the reference, well, we'd better ask our questions quickly.

Q. Now, there's another question from the government that said that -- in Mr. Foster's case, for instance, he wasn't required to come to see you, he wasn't required to come to you. Do you remember that?

A. Yeah. He was not required.

Q. Now, that's not the case -- that's different from Ms. Jackson's case again; correct?

A. Ms. Jackson was not required to speak with us, but we did show up at her door.

Q. She wasn't required to speak with you. Did you tell her that?

A. No.

Q. In fact, did you ever mention anything about her right to stop talking if she wanted to?

A. No. Ms. Jackson was not in custody.

Q. I know, but even if she's not in custody, someone has a right to stop talking; correct?

A. They do.

Q. Did you ever mention that, look, it might be a good idea if you have any questions or you feel uneasy about this, that if you want to talk to an attorney first, I can come back at a later time?

A. No.

Q. Have you ever done that with people that you've interviewed?

A. Not on an initial knock-and-talk where they're not in custody.

Q. Is part of the reason for that because you don't want someone to have an opportunity to actually talk to an attorney

or someone that may be able to advise them about what to do?
A. The purpose for that is to try to get the information that you're seeking during the interview.
Q. I think there's also -- there were questions at some point about proffer meetings, where now some proffer meetings have actual formal letters and things like that with people that are being interviewed; right?
A. Yes. Well, any -- I said all proffers pretty much have a proffer agreement.
Q. And there was nothing like that for Ms. Jackson; right?
A. No.
Q. You didn't show up with anything about letting her know what her rights were or maybe -- and this is just something -- not in custody, just telling her what the agreement was, what the understanding was between you and her; right?
(Clarification by the court reporter.)
THE WITNESS: I don't think I gave an answer. I was waiting for the rest of the question.
BY MR. MARSHALL:
Q. Is it fair to say that this was a surprise showup and you expected for Ms. Jackson to be surprised when you showed up?
A. Yes.
Q. And if she's surprised, she's not really kind of prepared to answer you and provide any kind of information really at that point; correct?

A. She seemed very comfortable and was providing information based on the questions.

Q. Even though she kept reminding you that she had an important call; right?

A. Yes. She said she had a call at 10:00 that she had to get on.

Q. At one point she even asked you, Can I get a card from you? Do you remember that?

A. Yes, I do.

Q. And do you remember when she first -- I think at that first meeting, was that when she didn't even -- you asked almost, Are you going to let us in?

A. Yes. It was a question, Are we going to talk outside here or are you going to let us in and we can talk inside?

Q. Okay. And she didn't know really what you were, right, initially? I mean, you're two FBI agents showing up; right?

A. Yes.

Q. Did you have your weapons on you?

A. We had our weapons on but concealed. We would have shown credentials and we would have had a badge.

Q. Okay. Just let me back up a little bit just to the timeline of when this all occurred. This interview occurred in July of 2020; correct?

A. Yes.

Q. Ms. Jackson's an African-American female; correct?

A. She is.
Q. Do you remember what occurred during this timeline a few months before the month of July 2020?
A. Yes.
Q. Do you recall the death of George Floyd?
A. Yes.
Q. And that occurred just a couple months before your visit to Ms. Jackson's house?
A. Okay.
Q. Do you recall the killing of Breonna Taylor?
A. Yes.
Q. Do you recall that's about in the same two- to three-month time frame to when you visited Ms. Jackson?
A. Okay.
Q. Okay. All right.

MR. MARSHALL: Ms. Holland, can you please put up Government's Exhibit 1000.

BY MR. MARSHALL:

Q. You've seen this document before, correct, Agent Stites?
A. Yes, I have.
Q. And what is this again for the jury?
A. This is the Paycheck Protection Program Borrower Application Form for Gaines Reservation & Travel.
Q. And this is a document that ended up where proceeds were disbursed for a loan to Gaines Reservation & Travel that

basically formed the basis of the two charges against Ms. Jackson; correct?

A. That's correct.

Q. So in all that we've heard, lots about the e-mails, all the e-mail communications and everything, do you have any e-mails between -- who submitted this application, by the way? Who signed it?

A. Andre Gaines.

Q. Do you have any e-mail communications from Andre Gaines to Carla Jackson about this document or about this loan?

A. No.

Q. Do you have any WhatsApp messages or text messages from Andre Gaines about this?

A. No.

Q. Do you have any e-mails, WhatsApp messages or text messages or anything from Carla Jackson to Andre Gaines about this PPP loan?

A. No.

Q. Do you have any communications at all from Darrell Taylor (sic) to Carla Jackson about this application from Gaines Reservation & Travel?

A. No. And the only way we would have gotten those messages would be through the business subpoena request that we submitted to Ms. Jackson.

Q. Or through a search warrant if you wanted to get some

devices; correct?

A. Or a search warrant. We chose to go the business subpoena route.

Q. Right. But in response to my question, you have absolutely no evidence of any communications regarding this application; correct?

A. We had no communications.

Q. All right. And no communications that Ms. Jackson was a party to that knew somebody was applying for a PPP loan for Gaines Reservation & Travel; correct?

A. Correct.

Q. All right.

MR. MARSHALL: Ms. Holland, can I please go to Government's Exhibit 1167. If you could scroll down, please, there's a check image. Right there.

BY MR. MARSHALL:

Q. Do you recall this exhibit that was admitted?

A. Yes.

Q. Do you recall which count of the indictment that is based on this document here, this check in the amount of $155,252.50?

A. I believe it's Count 46.

Q. Are there any e-mail communications, WhatsApp messages, text messages, or any other type of communications from Andre Gaines about this check to Carla Jackson?

A. No.

Q. Are there any such communications from Darrell Thomas to Carla Jackson about this check?

A. No.

Q. From John Gaines to Carla Jackson about this check?

A. No.

Q. And reversed, are there any types of communications from Carla Jackson to anyone about this check from Andre Gaines?

A. No.

Q. Okay.

MR. MARSHALL: Ms. Holland, can you please go to Document 1125, Government's Exhibit 1125.

BY MR. MARSHALL:

Q. What is this document, Agent Stites?

A. This is a wire transfer receipt for a wire transfer from a Gaines Reservation PNC Bank account.

Q. Okay. And who submitted this or who initiated this transfer? Not the bank, but who was the sender?

A. Andre Lee Gaines.

Q. You know what my questions are going to be. Are there any communications at all, any type at all, from Andre Gaines contacting Ms. Jackson and saying, hey, I've got a big wire transfer coming to you, you've got to look out for it?

A. No.

Q. Are there any communications from him saying, hey, this

is where these funds came from, how I got them, anything like that?

A. No.

Q. Are there any communications from Andre Gaines saying anything to the effect of, hey, when you get these funds, conceal them, hide them for us?

A. No.

Q. Okay. Anything from Darrell Thomas to that effect, anything from Darrell Thomas related to this wire transfer where he communicates with Carla Jackson?

A. No.

Q. From John Gaines, same thing, any communications that you have in your evidence that talk about this that are e-mails, WhatsApp, text messages, things of that nature?

A. Between John Gaines and Carla Jackson?

Q. Yes.

A. No.

THE COURT: Mr. Marshall, I'm sorry to interrupt you, but we've been going over an hour and half and I just got a note that someone needed a comfort break. So let's go ahead and take a ten-minute break, everyone. Thank you.

(After a recess was taken at 4:20 p.m., the proceedings continued at 4:33 p.m. as follows:)

THE COURT: Please bring out the jury.

(The jury entered the courtroom at 4:33 p.m.)

THE COURT: Y'all can be seated. Thank you.

Mr. Marshall, please proceed.

MR. MARSHALL: Thank you, Your Honor.

BY MR. MARSHALL:

Q. Good afternoon again, Agent Stites.

A. Good afternoon.

Q. So let me go through the form questions again on a couple more items, if you don't mind. Is that okay?

A. Sure.

Q. On the two deposits that were made into Management Resource Services that form the basis of Counts 46 and 47, I know we've said there are no communications anywhere. Are there any communications related to some type of a -- you know, I guess an effort to conceal the nature -- the source of the funds, like to try to hide the funds in Management Resources Services' bank account or something like that?

A. Between who? Communications between?

Q. From any of the parties I mentioned, Andre Gaines to Carla Jackson?

A. No.

Q. Or from John Gaines to Carla Jackson?

A. No.

Q. And the same thing with Darrell Thomas?

A. Correct.

Q. Right?

Any other persons? Do you have any other evidence where somebody communicated with Carla Jackson about, hey, we're trying to hide these funds in your bank account for your company, anything like that?

A. No.

MR. MARSHALL: Ms. Holland, can you pull up Government's Exhibit 1151.

BY MR. MARSHALL:

Q. Do you remember the government asking you a question about the Secretary of State, I guess, certificate of authority for Roadrunner?

A. Yeah.

Q. I think just generally.

And there are two names on that company; is that correct?

A. Correct.

Q. And who are the two names? What are the two names?

A. Carla Jackson and John Gaines.

Q. Now we're looking at Government's Exhibit 1151. Do you recall this being introduced into evidence?

A. I do.

MR. MARSHALL: Ms. Holland, can you go to the transaction page that has the deposit and the debits. Thank you. Stop right there. Can you please pull out that deposit part at the top. Thank you.

BY MR. MARSHALL:

Q. Do you know what the source is of the deposit that's dated June 5th, 2020, in the amount of $71,144.35?

A. No. It's basically a bank transfer.

Q. From which bank?

A. From the same bank.

Q. But do you know whose account?

A. Not based on this document.

Q. Do you have any communications at all from Andre Gaines to Carla Jackson about this deposit and what it's -- why it's coming into her account?

A. No.

Q. Any communications from Darrell Thomas for just one -- another example to Carla Jackson about this?

A. No.

Q. Any from John Gaines about why this $71,000 is coming into this account for Roadrunner?

A. No.

Q. Okay. Any communications from Carla Jackson to anybody about this?

A. No.

MR. MARSHALL: Thank you, Ms. Holland.

BY MR. MARSHALL:

Q. Let's go back just briefly. There was a question from the government about when you did your interview and you asked -- I think Ms. Jackson mentioned this proposal for this

project --

A. Yes.

Q. -- right?

And that that proposal was never, I guess, provided in the response to the subpoena, the grand jury subpoena; right?

A. Correct.

Q. Did you ever try to follow up and try to get a copy of that or talk to her about it?

A. Not me personally, no.

Q. Well, she did mention actually specifically a proposal. That would be kind of interesting to follow up on, would you say?

A. Yes.

Q. Is there a reason why you didn't follow up at all and try to find out if, you know, you could get a copy of that?

A. Ms. Jackson was represented at that point.

Q. Did you actually confirm that and reach out and find out who that attorney was?

A. No, I didn't.

Q. Okay. But if the proposal was important, you could have reached out to who that attorney is; correct?

A. Correct.

Q. Have you ever contacted attorneys before if you thought they were representing somebody in a case?

A. Sometimes.

Q. Have you done so to kind of request documents or see if maybe you can sit down and discuss certain documents?

A. A lot of times that will go through the US Attorney's Office to the attorney.

Q. Okay. Okay.

MR. MARSHALL: I do not know if I have this up front. Do you remember -- Mr. Foster's Exhibit F21, I don't know if I have that available right now. Do you have a printout of that, Leigh Ann? That's the list of the companies. Or does he have that up there?

F21.

BY MR. MARSHALL:

Q. Agent Stites, I'm going to bring Mr. Foster's Exhibit F21 up to you so you can look at it one more time. Is that okay?

A. Yes.

Q. Does that two-page document have an entry for Roadrunner?

A. Yes, it does.

Q. Any communications that you have involving Carla Jackson about Roadrunner related to that document that you have?

A. Communications from Carla Jackson?

Q. From her or to her.

A. No.

Q. And who is the other person that's one of the founders of this company?

A. John Gaines.

Q. Okay. All right. And John Gaines is charged in other counts in this indictment; correct?

A. Yes.

MR. MARSHALL: That's all I have, Judge.

Agent Stites, thank you.

THE WITNESS: Thank you.

THE COURT: Ms. Webster.

MS. WEBSTER: Thank you.

Can we see Government Exhibit 3000.

RECROSS-EXAMINATION

BY MS. WEBSTER:

Q. Agent Stites, on redirect do you recall talking about the loans that are on Defendant's Exhibit F21, the list that you were just looking at with Mr. Marshall?

A. Oh, yes. Yes.

Q. Do you recall testifying that those loans all began or were submitted in June of 2020?

A. Can you repeat the question?

Q. Do you recall -- I think that you testified that the loans on this list did not start until May or June of 2020. Sorry, it's not what's being displayed to you.

A. Okay.

Q. This list; right? Do you recall questions about when these loans were completed?

A. All the remaining items on that list or anyone -- what

loans specifically?
Q. Well, if I recall correctly, you testified that the -- there were multiple iterations of this list; correct?
A. Yes.
Q. And that all of the items on this list were created after Gena Pyfrom-Foster began communicating directly with Darrell Thomas; is that correct?
A. Not every one. Bellator was not, obviously.
Q. That's my point; right?
A. Yeah.
Q. So Bellator was actually submitted in --
A. That was early.
Q. -- April of 2020; right?
A. Yes.
Q. And to be clear, that's on this list?
A. Yes.
Q. Okay. Am I correct that you're basing your conclusions about what Gena Pyfrom-Foster was involved in based on the WhatsApp communications between her and Darrell Thomas primarily and the timing of those?
A. Yeah, primarily.
Q. And so -- but we don't have her phone; right?
A. Well, in addition to her interview, I guess, I guess to complete that answer. The --
Q. Okay. But we -- I'm sorry.

A. The e-mails, WhatsApp messages and her interview.
Q. We do not have her phone?
A. We don't.
Q. So we don't know what else is in there about her other communications?
A. Correct.
Q. And we don't have her devices; right?
A. Correct.
Q. So we don't have her laptop or a desktop computer or any other device to know when those documents were worked on?
A. Correct.
Q. And so we -- you can only -- you're basing your conclusions on what you have in front of you; right?
A. Correct.
Q. But there's a universe of material that we just don't have; right?
A. There are things we don't have.

MS. WEBSTER: Ms. Holland, can we see 2345, please. Sorry, this isn't the right one.

Can I have one second?

(Off-the-record discussion between counsel.)

MS. WEBSTER: Ms. Holland, I'm sorry, can we see 2300 at 435.

And thank you, Ms. Chaiken, for the help. I appreciate it.

BY MS. WEBSTER:

Q. So do you see that this is a Google Doc link at the bottom of page 435 here?

A. Yes.

Q. And are you familiar with how Google documents work?

A. A little bit.

Q. And -- well, are you familiar with -- that if you enter in information, it automatically saves and that sort of thing?

A. Yes.

MS. WEBSTER: Ms. Holland, can we see the top of the next page where he says, When you get employees, add them in here.

BY MS. WEBSTER:

Q. Correct?

A. Yes, I do see that.

Q. Okay. Agent Stites, did you ever actually click on that link, that Google Docs link?

A. I did not.

Q. So you're not aware that that document's actually completely blank?

A. I am not aware. I did not click on the link.

Q. Okay. Did you see a response from Teldrin Foster where he says, Okay, great, I'm going to put all the employees in here?

A. You want to scroll down and I'll look at this.

Just a lot of phone calls.
Q. But no affirmative responses; is that right?
A. I don't know what was talked about in the phone calls, but there's several incoming calls.
Q. Okay. Do you see that the date of this message -- When you get employees, add them in here, what date is that?
A. 7/14.
Q. At what time?
A. 11:31 p.m.
Q. And when is the next phone call?
A. Next day. The next day.
Q. It's approximately 24 hours later; right?
A. Yes.
Q. And just to clarify, when the government asked you on redirect about how you had to actually get a search warrant to get e-mails; right?
A. Yes.
Q. You can't just subpoena them; right?
A. Correct.
Q. Okay. And, you know, I asked a lot of questions if you had subpoenaed e-mails; is that right?
A. Yes.
Q. Just to be clear, did you get search warrants for those e-mails?
A. No.

Q. Was there -- to go to the deposit that we were discussing about -- into the Pyfrom Exclusive Consulting account, do you remember that deposit?

A. Yes.

Q. Were there, to your knowledge, any communications with Teldrin Foster about that deposit?

A. I'm not aware of any.

Q. And did you see any communication between Gena Pyfrom-Foster and Darrell Thomas about concealing the source of that deposit?

A. No.

MS. WEBSTER: Can I have one second, Your Honor?

THE COURT: Sure.

MS. WEBSTER: No further questions.

THE COURT: Any redirect?

MS. CHAIKEN: No, Your Honor.

MR. MARSHALL: No, Your Honor.

THE COURT: All right. Sir, you can step down.

Please call your next witness.

MS. CHAIKEN: Your Honor, the United States rests.

THE COURT: All right. Very well.

Ladies and gentlemen of the jury, if you could please step out for a moment.

(The jury exited the courtroom at 4:49 p.m.)

THE COURT: Y'all can be seated.

All right. Are there any motions?

MS. WEBSTER: Yes, Your Honor. We have a Rule 29 motion on behalf of Mr. Foster.

THE COURT: Go ahead.

MS. WEBSTER: Starting first with the money laundering count that's Count 59, I think that the evidence shows that Mr. Foster had no knowledge that it was occurring and had no idea that it had happened.

The only evidence that the government has pointed to has been his statement, which happened -- or which occurred many months after this deposit, while the evidence shows that Gena Pyfrom-Foster set up that account for purposes of her relationship with Darrell Thomas, and there's no indication that Mr. Foster was involved in that or knew about it.

Also, I don't think the government can or has established that the purpose of that transaction was to conceal the source of the deposit. It's charged as concealment, money laundering, and, therefore, the government has to prove that the purpose, not just the effect, was to conceal the source or the nature of the unlawful funds.

And there's certainly no evidence that there was any discussion about that or that that was the purpose of it, as opposed to the purpose being simply just to pay Ms. Pyfrom for her activity on behalf of Mr. Thomas.

That's my argument as to the money laundering count.

Your Honor, as to the remaining conspiracy counts and the substantive counts, the government has -- while I recognize the e-mails and WhatsApp messages have been introduced -- that the government has introduced e-mails and WhatsApp communications, the government hasn't brought a single witness who can actually say that Mr. Foster was the one using those e-mails or those WhatsApp -- that WhatsApp account. And so I think that there's insufficient evidence for those counts to go back to the jury as well.

THE COURT: All right. Thank you.

Mr. Marshall, any motions?

MR. MARSHALL: Yes, Judge. A Rule 29 motion for acquittal on both counts, 46 and 47. A general insufficiency of evidence argument, Judge.

Just to remind the Court, this is *United States v. Hawkins*, Eleventh Circuit Court of Appeals. It's at -- well, this is a 859 Fed.Appx. Case 415.

When a defendant has challenged the sufficiency of the evidence, which I'm about to, by an appropriate motion for judgment of acquittal, the Court must determine whether a reasonable jury could have found the defendant guilty beyond a reasonable doubt. In doing so, the appellate court views the evidence in the light most favorable to the government and all reasonable inferences and credibility choices are made in the government's favor. The jury's verdict cannot be overturned

if any reasonable construction of the evidence would have allowed the jury to find the defendant guilty beyond a reasonable doubt.

So the evidence against Ms. Jackson, Your Honor, is this: It's based on a knock-and-talk interview. And I'll get back to that in just a second. This is the basis of trying to satisfy the elements of the offense for money laundering concealment.

A walk-and-talk (sic) interview and answers that she gave or didn't give.

The two deposits that were made into her business account for Management Resource Services.

Deposits by themselves, Judge, aren't evidence of a knowledge of the source being an illegal activity or that the deposits themselves show that the purpose of those deposits being in that account are to conceal for some illegal activity.

The next evidence that the government has, they referenced withdrawals that were made in the amount of about $30,000 from that Management Resource Services bank account during the same month that the deposits were made. There were three separate $10,000 cashier's checks that appeared to be all related to John Gaines. Withdrawals from an account are not evidence that my client knew about the illegal source of these funds that came in from Gaines Reservation & Travel, or

that she knew about the concealment purpose, any kind of concealment purpose for such funds. The withdrawals have nothing to do with it. They don't provide any sufficient evidence to prove that.

The government also introduced several bank statements that showed low monthly bank balances in the Management Resource Services bank account. I know many people that have low bank accounts, Judge, low bank balances, and sometimes they get a big project and all of a sudden they have a big balance. Low bank balances is not indicia of someone's knowledge that the source of funds that came into their account came from illegal activity. In this case wire fraud is what's alleged.

After that, Judge, the other things that the Court (sic) does not have to provide any evidence, it was repeated over and over again, that there were no e-mails, no call logs, no phone recordings, no text messages, no WhatsApp messages that involved Carla Jackson at all. No messages from her, to her or about her related to the two most important elements. And I'm going to cite the main elements for money laundering, Judge.

In *United States v. Alexander*, it's an Eleventh Circuit case, 857 Fed.Appx. 592.

THE COURT: One moment, Mr. Marshall.

Go ahead.

MR. MARSHALL: 592. That's a 2021 case, Judge. Headnote 4. These are the main elements, and then I'm going to segue into our proposed jury instruction also, Judge.

To prove the offense of concealment money laundering under 18 USC 1956(a)(1)(B)(i), the government must determine that, number one, the defendant or -- conducted or attempted to conduct a financial transaction. That's the first element that has to be proven beyond a reasonable doubt.

Number two, the transaction involved the proceeds of a statutorily-specified unlawful activity. In this case, they're alleging wire fraud.

The third element that has to be proven beyond a reasonable doubt is that the defendant knew the proceeds were from some form of illegal activity. Proof beyond a reasonable doubt.

And number four, the defendant knew a purpose of the transaction was to conceal or disguise the nature, location, source, ownership or control of the proceeds. And that Federal Appendix case of *Alexander* cites to *United States v. Miles*, M-I-L-E-S. That's 290 F.3d, 1341. And the point cite is page 1355. That's a 2002 case, Your Honor.

Going to move over briefly to the proposed jury instruction. And I only say that this is something that we are almost at an agreement on but perhaps not. There is a request on the concealment part, the purpose part, that an

extra instruction be added, and that is this: To prove the element of concealment, the government must prove that the purpose, not merely the effect, was to conceal or disguise the nature, location, source, ownership or control of the proceeds. Evidence of concealment must be substantial. Merely conducting a transaction with money whose nature has been concealed is not in and of itself a crime.

And that is *Cuellar*, C-U-E-L-L-A-R, *vs. United States*. It's the basis of that extra language. That's a US Supreme Court case at 553 US 550. It's a 2008 case. And *United States v. Johnson*, an Eleventh Circuit case in 2006 at 440 F.3d 1286.

The government, Your Honor, has to prove beyond a reasonable doubt each of those elements. The two that they cannot show in this case automatically -- in our opinion is that Ms. Jackson knew that these funds came from an illegal source.

I'll go back to it again, Judge. The Gaines Reservation & Travel, this is a basis of both of these counts, funds that came from an illegal loan disbursement from a PPP loan application from Andre Gaines. He has not testified here at trial. He has said nothing about my client. There is nothing in the record to show that my client knew that this money was obtained fraudulently. That's Andre Gaines, Judge.

We also have nothing from Darrell Thomas who

communicated regularly with John Gaines and formed the basis of getting this fraudulent PPP loan application submitted. There are no communications, no testimony, because the government didn't call Darrell Thomas to see if my client had any knowledge whatsoever. Again, no testimony from a key witness in this case, Judge.

Now, I will comment briefly on the Roadrunner, Judge.

THE COURT: One moment.

Ms. Lee, can you find our court security officer, please.

Hi. Can you let the jury know they're done for the day and we will see them tomorrow morning at 9:30 -- actually, make it 9:00, but tell them I can't promise them I'll bring them out right at 9:00. All right. Thank you.

Go ahead, Mr. Marshall.

MR. MARSHALL: Judge, there was a reference to Roadrunner. The Court knows that I filed a motion in limine to keep out any reference to Roadrunner coming into this trial. The Court allowed some reference to Roadrunner as intrinsic evidence, primarily in the form of a bank signature card that showed John Gaines and Carla Jackson as signers on a bank account related to Roadrunner Automotive Group. And then a bank statement that showed a deposit in the amount of about $71,000.

There's no evidence again -- that's totally unrelated

to the two counts, by the way, Judge, so it's unrelated to determining whether sufficient evidence beyond a reasonable doubt whether Ms. Jackson is guilty of Counts 46 and 47. She's not charged with anything related to Roadrunner.

So as a general overall argument for these elements, Judge, it's just not -- it's just not made, Judge. They don't have those -- especially those two primary elements, that she knew the source of these funds came from an illegal activity, and, number two, that she knew beyond a reasonable doubt that the purpose of getting that money was to conceal the nature of the proceeds.

These were open and wide accounts. These weren't -- if you look at some of the cases involved, Judge, where they set up phony or shell companies and they move money back and forth between companies. This is Gaines Reservation & Travel, it's right out in the open. And then Management Resource Services, which had been in business for a long time. This was not a complicated structuring of a financial transaction that tried to hide the proceeds. This was out in the open.

So I'd say for these two main elements, Your Honor, I just think this is not met.

Now, I did want to raise a somewhat related -- an additional argument related to Count 46. And this goes to my argument, or at least a reference during opening statement about the government charging Count 46 as wire fraud being the

underlying basis for the transaction.

There was no wire transaction in Count 46. It was somebody walking into a bank branch and depositing this check of approximately $155,000, an in-branch bank deposit of an actual check. It wasn't a wire transaction. It's pled and in the indictment in Count 46 as a wire transaction. That's an error.

What I'd argue on this count, Judge, in addition to that sufficiency of the evidence has not been met beyond a reasonable doubt by the government, is that this is a constructive amendment of the indictment.

In this case, Judge, this is *Carter vs. United States* -- and excuse me -- this will be page 7. I'll give the point cite here in a second, Judge. This is Eleventh Circuit case, 2024 case. It's a LEXIS case at this point, Judge. US Appeals, LEXIS, page 17. It was decided January 2nd, 2024. It has references to what's referred to as this is a case that deals with a fatal variance or a variance of allegations that are put forth in an indictment and what's presented at trial in proof. And I wanted to focus on the constructive amendment argument.

The Fifth Amendment provides that no person shall be held to answer for a capital or otherwise infamous crime unless on a presentment or indictment of a grand jury. This clause does not permit a defendant to be tried on charges that

are not made in the indictment against him or convicted on theories that the indictment cannot fairly be read as charging.

The constructive amendment of an indictment occurs when the essential elements of the offense contained in the indictment are altered, for instance, by a faulty jury instruction, to broaden the possible bases for conviction beyond what is contained in the indictment. Such an error is per se reversible because it violates the defendant's constitutional right to be tried solely on the charges returned by the grand jury.

All right. So in this one, Judge, if you read the allegations in Count 46, it's alleging a wire fraud. The evidence that's been presented at trial has nothing to do with a wire transfer that's done of that $155,000.

We'd argue a constructive amendment issue, too, as part of our Rule 29 motion.

That's it, Judge.

THE COURT: Thank you, Mr. Marshall.

Ms. Chaiken?

MS. CHAIKEN: Your Honor, would you like me to take them one at a time?

THE COURT: Yes.

MS. CHAIKEN: Okay. I'll start in reverse order, Your Honor.

As to the mistake in the indictment in Count 46, I don't think there's a constructive amendment or a material variance. Constructive amendment occurs when an essential element is altered to broaden the possible bases for conviction.

The type of financial transaction is not an essential element of the offense. A money laundering conviction requires that there be a financial transaction, but it does not require that there be a specific type of transaction or even a specific amount of transaction. Those are not essential elements of the offense. There just needs to be a financial transaction. And so there's no constructive amendment there.

A material variance occurs where the facts at trial are different than what's in the indictment, but a material variance only warrants dismissal of a charge if it substantially prejudices the defendant. And that happens only when the defendant is unfairly surprised by the evidence at trial given the difference in facts to where he cannot meet it.

And here the indictment in Count 46 specifically identifies the exact amount of the transaction, the bank account that it came from, the bank account that it went to, and the date on which that deposit or financial transaction occurred.

And so there's no surprise here. Mr. Marshall obviously was well aware before this trial that there was an issue. We had discussed it with him before. There was no variance that surprised the defendant or prevented her from being able to defend this count because everything else in the indictment is correct except for the specific type of a transaction.

Mr. Marshall also mentioned this error in his opening, such that he clearly understood that this was going to be -- that the trial was related to a check, as opposed to a wire transfer.

And he didn't object to the admission of the check itself. So we don't see how there could be a material variance that substantially prejudices Ms. Jackson's substantial rights.

Substantively, as far as the evidence in the case, Your Honor, we think there's more than sufficient evidence on which a reasonable jury could return a guilty verdict. Specifically addressing the two elements that Mr. Marshall suggested have not been proven or could not be found to have been proven beyond a reasonable doubt, I think the Court doesn't need to look any further than Ms. Jackson's own statement to find that there's evidence in the record from which the jury could find that she knew that the money came from an illegal source and knew it was designed to conceal --

knew the transaction was designed to conceal the nature, location, source or purpose of the funds, because there is nothing illegal about moving money from one account to the other. And if Ms. Jackson really thought that this was just money that she was getting from Mr. Gaines or money that was for a project, she would have said that.

But what she said when she was asked what the money was for was payroll. That's the first word that she said, it was payroll. And that's because she knew that payroll was the authorized purpose of the PPP program. She knew that that was an authorized expense. And she knew that that's what the money was supposed to be spent on.

She told a lot of lies about what that money was for. She said she did not know Andre Gaines. He was referred to her by a contractor. She said they hadn't really planned the project yet, they didn't know what it was for. But the evidence at trial established Gaines Reservation & Travel had no business, had no payroll, had no projects, had no money coming into its bank account.

And so the evidence at trial proved beyond a reasonable doubt it couldn't have been for a project. That was just made up because there was no business for Gaines Reservation & Travel to do a project on.

And Ms. Jackson deposited a check on which the memo line was payroll and business management services, daily

business management, which there wasn't any. She wasn't doing daily business management because there was no business to manage. She wasn't doing payroll because there was no payroll.

She then used that money to pay off Mr. Gaines's auto loans. And I would note that those payments on the auto loans came before the second wire transfer. So when the wire transfer came in and said that it was for payroll, at that point she knew it wasn't for payroll because she knew that she had been asked to make payments to pay off Mr. Gaines's auto loans. She knew that Mr. Gaines for some reason couldn't pay off his auto loans from his own accounts, even though there's no reason why his auto loan payments would have to come through her accounts.

So I think all of those circumstantial factors show that Ms. Jackson knew that the funds came from an illegal source. And I would just emphasize, Your Honor, that she doesn't need to know what the specific source was. She doesn't need to know that it came specifically from a PPP loan. She just needs to know that it came from an illegal source.

And the fact that she went to great lengths to make up a essentially of what the money was for and what the money was used for and to not mention who she actually communicated with about that loan was -- I think shows that she did know

that it came from an illegal source.

We also presented evidence that all of the log-ins to the Gaines Reservation & Travel bank account were from Ms. Jackson's home. That's additional evidence that she was aware of what was happening because it was happening inside of her own house after the time that the Gaines Reservation & Travel PPP loan funded.

And, you know, Your Honor, this is -- these are exactly the types of charges where the case is proven on circumstantial evidence because it's incredibly rare for somebody to have text messages that they've exchanged with someone about how they're going to conceal funds.

And so I think the circumstantial evidence here is strong that Ms. Jackson knew the funds came from some form of unlawful activity and knew based on what the transactions themselves said they were for and knowing that that's not actually what they were for, that they were designed to conceal the nature, location, source or purpose.

As far as Mr. Foster, Your Honor, again, I don't think the Court needs to look any further than Mr. Foster's own words on the money laundering count. He, himself, said that the payment that went through Ms. Pyfrom-Foster's account was a payment to him and that he is the one who got the money for it. He said that that was because his account had gotten locked down and so it had gone through Ms. Pyfrom-Foster's

account.

And it said that it was for payroll, business management, I think. Said something about payroll. And so, again, that was a transaction that went through Ms. Pyfrom's account, but he said that it was for him. And I think his admission is sufficient to send that to the jury.

As far as the other -- the other charges, again, Ms. Webster said we haven't presented any witness who said that it was him sending the e-mails, but he admitted in his recorded statement that he worked with Darrell Thomas on these PPP loans. I think the circumstantial evidence that we presented is very strong that it was Mr. Foster himself who was doing this.

We showed the records identifying his phone number as being his phone number. We showed how the WhatsApp messages line up with the e-mail records. And we showed the payments to him. We showed his admission. And all of that evidence I think fits together to show that he was -- that he knowingly participated in all of these PPP loans.

THE COURT: All right. Thank you.

I'm not persuaded by the constructive amendment material variance argument Mr. Marshall made. Nor am I persuaded by either the Rule 29 motions more specifically as to each defendant. I believe the evidence viewed in light most favorable to the government has been sufficient for a

rational trier of fact to find guilt beyond a reasonable doubt; therefore, the motions are denied.

Have you decided which order you're going to proceed with your cases in the morning, Ms. Webster, Mr. Marshall?

MS. WEBSTER: Yes, Your Honor. I believe we are going to go first.

THE COURT: Okay. And how many -- if you're able to tell us, how many witnesses do you anticipate calling and how long do you think that will last?

MS. WEBSTER: I anticipate three witnesses, Your Honor. I think if -- it could last through the morning, but I don't anticipate it lasting beyond then.

THE COURT: Okay. Mr. Marshall.

MR. MARSHALL: Judge, so we've had something come up with a witness that we intend to call, which is John Gaines. He's available. His attorney in this case is Deana Wiley. And Ms. Wiley contacted the government and me this morning. She has tested positive for COVID and she was pretty ill this morning. She went to the urgent care right away.

And I just checked my phone right now and I believe she's had her first dose of Paxlovid. Hopefully she'll be better tomorrow.

My guess is, Judge, that for me to be able to call Mr. Gaines in to testify, Ms. Wiley has to be there for him. She says, I need to be there -- she's the only one that knows

the case -- to make sure his interests are protected. He has still an open sentencing that has not been conducted. So another attorney can't just sit in for her.

I'm hoping that maybe what we can do is have Ms. Wiley participate by Zoom and be able to watch the proceeding. And if there's -- an issue comes up, she can, you know, pipe in if she needs to. But that's kind of where we are, Judge.

Mr. Gaines can be available, but it's an issue of Ms. Wiley's availability. And unless we can accommodate it through Zoom, I would move for a continuance for at least some period of time until she gets better.

THE COURT: All right. Well, other than Mr. Gaines, how many other witnesses do you have and how long do you think that will take, assuming we can work through the Mr. Gaines issue?

MR. MARSHALL: I'd have to have a discussion with my client to see if she wants to testify. I'll have that tonight. But I would say the total time for Mr. Gaines might be, from my side, no more than an hour, you know. I don't think it's going to be that long, Judge.

THE COURT: All right.

Obviously, I think we have an issue if this involved one of the defendants in this case and their attorney, as far as their attorney being here in person. I don't see any

issue, unless anyone wants to raise one, with a witness's attorney testifying remotely in this situation.

Any objection from the government?

MR. KAUSHAL: No objection, Your Honor.

THE COURT: All right. Any objection from Mr. Foster?

MS. WEBSTER: No, Your Honor.

THE COURT: Okay. And, Mr. Marshall, I assume you have no objection?

MR. MARSHALL: I have no objection.

THE COURT: Okay. Ms. Lee, if you can set us up for Zoom tomorrow so that she'll be able to see us, we'll be able to see her. And then I know we can do a -- you know, if we need to, I guess it wouldn't apply when he was up on the stand, but if there's -- at some point, if he needs to speak with her, we may need to have a second place where that can happen. But it doesn't need to -- I think that's probably not a huge issue. Okay?

COURTROOM DEPUTY CLERK: Okay.

THE COURT: All right. Anything else for this evening, Counsel?

MR. KAUSHAL: Your Honor, there is one other issue, as you've heard that so many times in this trial, and I'm sorry to have to say it yet again.

With Mr. Dixon, he has been appointed counsel by the

Court. I'm not certain if he has had an opportunity to speak with his attorney. He may not even know why he is coming to this courthouse. And there may need to be some time that he needs to speak with his lawyer.

We have no idea what the substance of his testimony might be and, therefore, can't really say what issues might arise if he is called to testify. And we think it makes sense to have a discussion about what the defense intends to elicit from Mr. Dixon so that we can have an educated discussion about what issues may come up during his testimony.

THE COURT: Ms. Webster, I'll let you respond to that.

MS. WEBSTER: Thank you, Your Honor.

Stephen Burn has been appointed to represent Mr. Dixon. He has not, to my knowledge, had an opportunity to meet with him. My understanding is that the Court has directed that he be brought over tomorrow from RAD. And so I believe that Mr. Burn is planning to speak with him at 9:00 tomorrow. And we would ask to be -- to have some time tomorrow morning to be able to meet with Mr. Dixon or Mr. Burn after he has a chance to speak with Mr. Dixon, a brief break.

THE COURT: Well, you know, when either of y'all speak to anyone, it doesn't matter to me, but we need to move this trial along. So I guess you need to call one of your other witnesses at 9:00 if you're going first. And then, you

know, if we have breaks for anybody on either side to talk to anybody on either -- the other side they want, you know, I'm happy for y'all to do that, but we're not going to, you know, take long breaks.

And it sounds like, Mr. Kaushal, Ms. Webster has declined your offer to give a proffer of what she intends to elicit from Mr. Dixon. I'm not surprised that was her decision, but if you have some authority that tells us we have to twist her arm to tell you, I'm happy to look at it.

MR. KAUSHAL: Your Honor, I don't have authority for that, but I have a prediction that there will be some road bumps tomorrow and that's going to slow us down. All I'm trying to do is to facilitate a smooth completion of this trial so that we don't have to inconvenience Your Honor and the jury with more stops and starts like we've had. So it's just an effort to work through the issues, Your Honor. I understand the Court's view and defense counsel's.

THE COURT: I appreciate that. I don't think there's anything I can do to force her hand and, you know, I -- y'all know more about the case and what you're talking about than I do. I'm not sure what your issue may be, but I -- you know, I would encourage everyone to be efficient as always. But at the same time, you know, nobody has to do what the law doesn't require them to do. So there you go.

All right. So anything else we anticipate needing to

discuss tomorrow before I bring the jury in at 9:00 and Ms. Webster calls her first witness, other than Mr. Dixon?

MS. CHAIKEN: Your Honor, would you like us to be prepared to close tomorrow afternoon? Or do you anticipate that however far we get tomorrow, we would do the charge conference and close on Wednesday?

THE COURT: I've flipped through the charge issues. Didn't look like they were all that heavy. So why don't we see -- I hate to promise you, no, don't worry about closing tomorrow and then we're done at 1:00 and the charge conference takes 15 minutes. So, you know, I'll be reasonable, but I just don't want to make any promises, I'm sorry.

MS. CHAIKEN: Okay.

MR. MARSHALL: Your Honor, should I plan on Mr. Gaines, if he -- you know, if he's going to be here, being here in the morning and available or at 1:00? Is there --

THE COURT: Well, I know you're going after Ms. Webster and she said that she anticipates that her witnesses will last most of the morning. So best guess would be early afternoon. But, you know, maybe Ms. Webster will go quicker and you'll need Mr. Gaines quicker, maybe she'll go slower and you won't. I just don't know.

MR. MARSHALL: All right. Okay, Judge.

THE COURT: I'd let you consult with Ms. Webster on that if you want any more details, but you have as much

information as I have.

MR. MARSHALL: Thank you, Judge.

THE COURT: Anything else?

MS. WEBSTER: No, Your Honor.

THE COURT: Okay. I hope everyone has a nice evening and I'll see you at 9:00 tomorrow morning.

Take care.

(Off-the-record discussion.)

THE COURT: Yes, back on the record.

Yes, Mr. Kaushal.

MR. KAUSHAL: Thank you, Your Honor.

I think we left open the discussion about the issue of the co-defendants' guilty pleas being admitted.

THE COURT: We had. Therefore I was -- I was planning to circle back to that and I saw that you rested before we'd circled back to that, so I assumed that you decided not to enter that.

MR. KAUSHAL: I think we realized now, Your Honor, that perhaps we could have raised the issue before we rested. But it was something on our mind and it was something that was unresolved. And if Your Honor is willing to issue a ruling on that, we would appreciate it.

We do believe --

THE COURT: Well, let me hear from the defense on that. I mean, I had it as an open item on my to-do list that

I was going to circle back to and you rested. So defense -- I don't know if the defense is going to take issue with that or not.

MS. WEBSTER: Your Honor, we'd object to reopening the government's evidence after they've rested.

THE COURT: Mr. Marshall?

MR. MARSHALL: I'm sorry, Judge, I apologize.

What's the question?

THE COURT: Yes. The government rested before I ruled on or revisited the government's motion to introduce guilty pleas of various myriad co-defendants, which I thought was odd, but they did.

Now apparently realizing that, they've asked to go back and do it now and have me rule on the issue. And I said, well, let me hear from the defense.

MR. MARSHALL: So, Judge, their case is closed. All the rulings should have been asked for and ruled upon by the time that they closed their case, Judge.

THE COURT: Well, this may be an issue in which you lose the battle but rejoin the war later. I know that the defense plans to put on a case. It may be that you put on some type of rebuttal case, Mr. Kaushal. I don't know.

But as far as right now, you've rested. It may be that that's the end. And if so, I can't -- I don't know that it's fair to reopen things for you.

But, again, it may be that the defense decides to put on a case and it may be that you have a rebuttal case that includes wanting to introduce those materials. And if you do, I'll make a ruling on that at that time.

MR. KAUSHAL: Thank you, Your Honor.

And just as a preview, we would be asking for the Court to take judicial notice of those guilty pleas if we eventually reach that day in the future for that event to occur. That would be the requested relief, Your Honor.

THE COURT: All right. Very well.

Okay. Everyone have a good evening.

(After a recess at 5:27 p.m., proceedings were continued as follows on February 13, 2024:)

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C E R T I F I C A T E

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF GEORGIA

I do hereby certify that the foregoing pages are a true and correct transcript of the proceedings taken down by me in the case aforesaid.

This the 12th Day of February, 2024.

PENNY PRITTY COUDRIET, RMR, CRR
OFFICIAL COURT REPORTER

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