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

UNITED STATES OF AMERICA, V. DARRELL THOMAS, ANDRE LEE GAINES, KAHLIL GIBRAN GREEN SR., A/K/A KHALIL GREEN, BERN BENOIT A/K/A BURN BENOIT, AND CARLA JACKSON	CRIMINAL CASE NO. 1:20-CR-00296-JPB-AJB

BILL OF PARTICULARS

The United States of America, by Kurt R. Erskine, Acting United States Attorney, and Radka T. Nations, Assistant United States Attorney for the Northern District of Georgia, hereby files this Bill of Particulars to add the following property to the forfeiture provision of the above-captioned Indictment:

- $131,610.00 in United States currency seized on August 6, 2020.
- Men's yellow gold Rolex with diamond bezel and dial.

- 18K yellow gold Cuban link necklace with diamonds in clasp.
- 18K yellow gold Cuban link bracelet with diamonds in clasp.

Respectfully Submitted,

KURT R. ERSKINE
Acting United States Attorney

/s/ Radka T. Nations
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Certificate of Service

I served this document today by filing it using the Court's CM/ECF system, which automatically notifies the parties and counsel of record.

March 30, 2021

/s/ RADKA T. NATIONS

RADKA T. NATIONS
Assistant United States Attorney