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

UNITED STATES OF AMERICA	
v.	Criminal Action
CARLA JACKSON	No. 1:20-cr-296-JPB-AJB

CONSENT MOTION TO TOLL SPEEDY TRIAL TIME

The United States of America, by Kurt R. Erskine, Acting United States Attorney for the Northern District of Georgia, and Tal C. Chaiken and Nathan P. Kitchens, Assistant United States Attorneys for the Northern District of Georgia, respectfully files this motion to toll the speedy trial time. In support of this Motion, the United States shows as follows:

1. On August 4, 2020, a federal grand jury sitting in the Northern District of Georgia returned an indictment charging Defendant Carla Jackson with two counts of money laundering in violation Title 18, United States Code, Section 1956(a)(1)(B)(i) and Section 2. (DE 1, Counts 27-28.) The indictment also included charges against four co-defendants: Darrell Thomas, Andre Lee Gaines, Bern Benoit, and Kahlil Gibran Green, Sr. (DE 1.)

2. Defendant Green entered a guilty plea on September 1, 2020 and Defendant Benoit entered a guilty plea on March 11, 2021. On May 7, 2021, the Court certified the case against Defendant Jackson ready for trial. On May 10, 2021 and May 21, 2021, the Court certified ready for trial the cases against Defendants Darrell Thomas and Andre Lee Gaines, respectively. Defendants Thomas and Gaines have since entered guilty pleas.

3. Defendant Jackson has not determined whether she will enter a guilty plea or proceed to trial and the Parties wish to engage in continued discussions to aid in that determination.

4. For these reasons, the time between the filing of this Motion and the date on which Defendant Jackson notifies the Court of her intention to enter a guilty plea or to proceed to trial should be excluded from speedy trial calculations. Under 18 U.S.C. § 3161(h)(7)(A), the ends of justice served by excluding this period outweigh the best interest of the public and the defendant in a speedy trial.

5. Counsel for the United States have conferred with David Marshall, counsel for Defendant Jackson, who stated that Defendant Jackson consents to the relief sought in this Motion.

WHEREFORE, the United States respectfully requests that the Court Grant the Motion and exclude from the speedy trial calculation the time from the date of the filing of this Motion to the date that Defendant Jackson notifies the Court of her intention to enter a guilty plea or to proceed to trial.

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Certificate of Service

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

David D. Marshall, Esq.

June 25, 2021

/s/ NATHAN P. KITCHENS

NATHAN P. KITCHENS

Assistant United States Attorney