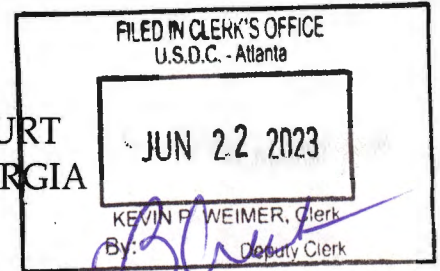


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION



UNITED STATES OF AMERICA, :
 :
 v. : CRIMINAL ACTION
 : NO: 1:21-CR-206-01-JPB
 :
 ANDRE LEE GAINES, :
 :
 Defendant, :
 and :
 :
 MORGAN & MORGAN PLLC, :
 :
 Garnishee. :

APPLICATION FOR WRIT OF GARNISHMENT

The United States of America, by and through the United States Attorney for the Northern District of Georgia and the undersigned Assistant United States Attorney, respectfully applies to the Clerk of Court for the Northern District of Georgia for issuance of a Writ of Garnishment pursuant to 28 U.S.C. § 3205(b)(1) upon the judgment entered against Defendant, Andre Lee Gaines, whose social security number is xxx-xx-2232 (hereinafter referred to as "judgment debtor" or the "Defendant") and whose last known address¹ is in Dallas, GA.

¹ Pursuant to Fed. R. Crim. P. 49.1, Defendant's social security number has been redacted to the last four digits and Defendant's home address has been redacted to the city and state to prevent public disclosure. Upon request of the Court, the full social security number and address will be provided in camera.

1. A judgment in the amount of \$806,810.00, plus costs and post-judgment interest at the rate of 0.11% compounded annually, was entered against the Defendant on October 5, 2021. As of June 20, 2023, the judgment balance is \$762,691.33.

2. Demand for payment of the above-stated debt was made upon the Defendant not less than 30 days from the date of this application and Defendant has failed to satisfy the debt.

3. Upon information and belief, the below listed garnishee (the "Garnishee") is believed to owe or will owe, or is in possession of, money, property to the Defendant, or is in possession of property of the Defendant. Said property is a nonexempt interest of the Defendant.

The name and address of the Garnishee is:

Morgan & Morgan PLLC
c/o Registered Agent Solutions, Inc.
900 Old Roswell Lakes Pkwy, Ste 310
Roswell, GA 30076

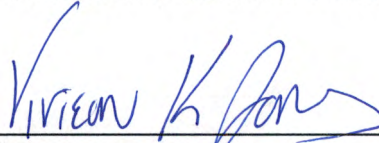
Morgan & Morgan PLLC
Attn: Gregory Johnson, Esq.
408 12th St., Suite 200
Columbus, GA 31901

4. The United States will serve the Garnishee and Defendant with a copy of the Writ of Garnishment and shall certify effectuation of service of process to the Court. The Writ of Garnishment will be accompanied by (a) instruction to the Garnishee of the requirements to submit a written Answer; and (b) instructions to the Defendant for objecting to the Garnishee's Answer and obtaining a hearing on the objections (attached hereto).

WHEREFORE, the United States requests that the clerk issue a Writ of Garnishment to Garnishee.

Dated this 21st day of June, 2023.

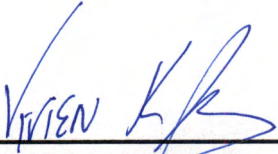
RYAN K. BUCHANAN
UNITED STATES ATTORNEY



VIVIEON K. JONES
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Atlanta, Georgia 30303
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404-581-6167 Fax
vivieon.jones@usdoj.gov

CERTIFICATE OF COMPLIANCE

I hereby certify, pursuant to Local Rules 5.1B and 7.1D, that the foregoing was typed using 13-point Book Antiqua font.



VIVIEON K. JONES
Assistant United States Attorney