

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

UNITED STATES OF AMERICA

v.

TELDRIN FOSTER,
JOHN GAINES A/K/A
MARTY GAINES
JERRY BAPTISTE, AND
CARLA JACKSON

Criminal Action No.

1:20-CR-296-JPB-CMS-5, 11,
13, 20

**United States' Response to Defendants' Motions
for Disclosure of Government Cooperating Witnesses'
Sealed Plea Agreements and Presentence Investigation Reports**

The United States of America, by Ryan K. Buchanan, United States Attorney for the Northern District of Georgia, and Tal C. Chaiken and Samir Kaushal, Assistant United States Attorneys, and by Glenn S. Leon, Chief of the Fraud Section, and Siji Moore, Trial Attorney, respectfully files this response to the defendants' Motions for Disclosure of Government Cooperating Witnesses' Sealed Plea Agreements and Presentence Investigation Reports. (Docs. 779, 782, 783, 784.)

1. The defendants have requested the disclosure of Presentence Investigation Reports ("PSRs") and sealed plea agreements for co-defendants who may testify at trial. (*See* Doc. 779 at 4.)

2. On or about December 26, 2023, the United States filed under seal a motion seeking *ex parte* review of PSRs for co-defendants who may testify

at trial. (Docs. 777, 778.) The motion attached as exhibits the PSRs in the United States' possession and contained highlighting identifying the sections that the United States proposes should be disclosed to the defense. The motion also attached a proposed order authorizing the disclosure of the relevant portions of the PSRs. At the Court's order, the United States will send the portions of the PSRs that the Court orders should be disclosed to the defendants via electronic mail.

3. There are no under seal plea agreements in this case. All plea agreements are available on the public docket. In the United States' possession, there is one under seal plea agreement addendum and one signed proffer letter from a case charged in another District that the United States would like to make available for defense counsels' review at the U.S. Attorney's Office. Defense counsel can contact the U.S. Attorney's Office to schedule a time to conduct their review of these two documents.

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Respectfully submitted,

RYAN K. BUCHANAN
United States Attorney

GLENN S. LEON
Chief, Fraud Section
U.S. Department of Justice

/s/ Tal C. Chaiken
TAL C. CHAIKEN
Assistant United States Attorney
Georgia Bar No. 273949

/s/ Siji Moore
SIJI MOORE
Trial Attorney, Fraud Section
U.S. Department of Justice

/s/ Samir Kaushal
SAMIR KAUSHAL
Assistant United States Attorney
Georgia Bar No. 935285

600 U.S. Courthouse
75 Ted Turner Drive SW
Atlanta, GA 30303
404-581-6000; Fax: 404-581-6181

1400 New York Ave, NW
Bond Building, 11th Floor
Washington, DC 20005
202-514-2000; Fax: 202-514-3708