

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

UNITED STATES OF AMERICA

v.

CARLA JACKSON

Criminal Action No.
1:20-CR-296-JPB-5

PARTIES' PROPOSED VERDICT FORM

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, and Defendant Carla Jackson, by her attorney David D. Marshall, jointly file this Proposed Verdict Form.

The language highlighted in yellow below is language that the United States has proposed and to which Defendant Jackson objects. The United States' position is set forth below. In addition, while the United States has no objection related to the order of "Guilty" and "Not Guilty" on the verdict form, it requests that the same order be used in each defendant's verdict form.

United States' Position: With respect to the language "As to Count [#] of the Indictment charging money laundering," the United States requests this language to aid the jury in its review and deliberation as to this multi-defendant, multi-count indictment. Placing the relevant charge for each count on the verdict form will ensure that there is no confusion as to the jury's verdict.

As to the language "unanimously," the United States believes that language is appropriate given the requirement that any verdict reached be unanimous.

Dated: January 23, 2024

/s/ David Marshall (with permission)

DAVID D. MARSHALL

Counsel for Carla Jackson

Georgia Bar No. 471517

ddmarshall98@gmail.com

Respectfully submitted,

RYAN K. BUCHANAN

United States Attorney

/s/ Tal Chaiken

TAL C. CHAIKEN

Assistant United States Attorney

Georgia Bar No. 273949

Tal.Chaiken@usdoj.gov

SAMIR KAUSHAL

Assistant United States Attorney

Georgia Bar No. 935285

Samir.Kaushal@usdoj.gov

GLENN S. LEON

Chief, Fraud Section

U.S. Department of Justice

SJI MOORE

Trial Attorney, Fraud Section

U.S. Department of Justice

Babasijibomi.Moore2@usdoj.gov

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VERDICT

Count 46:

As to Count Forty-Six of the Indictment charging money laundering, we, the Jury, **unanimously** find Defendant Carla Jackson:

_____ Not Guilty

_____ Guilty

Count 47:

As to Count Forty-Seven of the Indictment charging money laundering, we, the Jury, **unanimously** find Defendant Carla Jackson:

_____ Not Guilty

_____ Guilty

SO SAY WE ALL.

Signed and dated at the United States Courthouse, Atlanta, Georgia,
this _____ day of February, 2024.

Foreperson's Signature

Foreperson's Printed Name