



COVER SHEET

To:	Grand Jury Clerk	From:	Carla Jackson
Email	USAGAN.GrandJury@usdoj.gov		Mgmt Resource Svcs
Phone:		Phone:	[REDACTED]
No. Pages:	30	Date:	7/20/2020
Subject:	Production Request – Carla Jackson & MRS		
Comments:			

[Phone]

[Email]

[Website]

[Fax]

7/19/2020

To Whom It May Concern:

In response to the production request:

- A. Reference Attachment A (Tax return for Management Resource Services and Carla Jackson)
- B. Records for Wells Fargo Account 9317161207 are electronic and inaccessible due to account closure.
- C. A PPP application was not submitted; therefore, no record(s) exists.
- D. PPP funds were not utilized by Management Resources Services or Carla Jackson.
- E. Reference 'Attachment A' (Tax returns for Management Resource Services and Carla Jackson).
- F. Reference 'Attachment A; (Tax returns for Management Resource Services and Carla Jackson).
- G. Payments were not made to the individuals listed within section 'H'.
- H. Payments were not made to any of the individuals listed in section H. Money was transferred to Management Resource Services.
- I. In-person communications were held with Andre Gaines/Gaines Reservation and Travel LLC.



Carla Jackson



U.S. Department of Justice
United States Attorney
Northern District of Georgia

*Richard Russell Federal Building
75 Ted Turner Dr. S.W., Suite 600
Atlanta, Georgia 30303*

*Telephone: (404) 581-6000
Fax: (404) 581-6181*

Custodian of Records

Re: Certification of Authenticity of Business Records

Dear Sir or Madam:

The attached federal grand jury subpoena directs your business to produce certain business records and/or information for use in a federal investigation. At some point in the future, it may be necessary to offer some or all of the documents as evidence in a federal trial in the United States District Court for the Northern District of Georgia. In the past, unless both parties stipulated to the admissibility of business records, it was necessary for a witness from the business to physically appear at trial and testify that the records were authentic, within the meaning of Rule 902 of the Federal Rules of Evidence, and that they were business records, within the meaning of Rule 803(6) of the Federal Rules of Evidence.

Effective December 1, 2000, Federal Rules of Evidence Rules 803(6) and 902 were amended to permit the foundation requirements of Rule 803(6) and the authenticity requirements of Rule 902 to be satisfied under certain circumstances without the expense and inconvenience of producing witnesses. I have attached a Business Record Certification form for a qualified representative of your business to sign. Please review the Certification to determine whether it is an accurate statement with regard to the referenced business records. If the Certification is accurate, please sign and return the original Certification along with the subpoenaed records to the grand jury clerk as directed by the subpoena. There is no guarantee that your business' custodian of records will not have to appear at trial to authenticate the business' records and lay the proper business record foundation. However, when appropriate, the United States Attorney's office will make every effort to use the Business Record Certification attached instead of the testimony of your custodian of records.

If you have any questions, please do not hesitate to contact me at (404) 581- 6069

Sincerely,

BYUNG J. PAK
UNITED STATES ATTORNEY

/s/ Tal Chaiken

ASSISTANT U.S. ATTORNEY

Enclosures

10K

**CERTIFICATE OF AUTHENTICITY OF DOMESTIC RECORDS PURSUANT TO
FEDERAL RULES OF EVIDENCE 902(11) AND 902(13)**

I, Carla Jackson, under penalties of perjury by the laws of the United States of America pursuant to 28 U.S.C. § 1746, attest that the information contained in this certification is true and correct. I am employed by Management Resource Svcs ("Company"), and my title is Owner. I am qualified to authenticate the records attached hereto because I am familiar with how the records were created, managed, stored, and retrieved. I state that the records attached hereto are true duplicates of the original records in the custody of Company. The attached records consist generally of requested information/. I further state that:

1. All records attached to this certificate were made at or near the time of the occurrence of the matter set forth by, or from information transmitted by, a person with knowledge of those matters, they were kept in the ordinary course of the regularly conducted business activity of Company, and they were made by Company as a regular practice; and
2. To the extent the records were generated by an electronic process or system, such records were generated by Company's electronic process or system that produces an accurate result, to wit:
 - a. The records were copied from electronic device/s, storage medium/s, or file/s in the custody of Company in a manner to ensure that they are true duplicates of the original records; and
 - b. The process or system is regularly verified by Company, and at all times pertinent to the records certified here the process and system functioned properly and normally.

I further state that this certification is intended to satisfy Federal Rules of Evidence 902(11) and 902(13).

7/20/2020
Date

Carla Jackson
Signature

AO 110 (Rev. 06/09) Subpoena to Testify Before a Grand Jury

UNITED STATES DISTRICT COURT

for the
Northern District of Georgia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Management Resource Services Inc.
Attn: Carla J. Jackson
4683 Darlene Way
Tucker, Georgia 30084

YOU ARE COMMANDED to appear in this United States district court at the time, date, and place shown below to testify before the court's grand jury. When you arrive, you must remain at the court until the judge or a court officer allows you to leave. +

Place:

GJ #4-19
United States Courthouse
75 Ted Turner Dr. SW, Room 2037, Atlanta, GA 30303 +

Date and Time:

July 21, 2020

X You must also bring with you the following documents, electronically stored information, or objects *(blank if not applicable)*:

See Attachment

Although the law does not prohibit disclosure, it is requested that you do not disclose the existence of this subpoena. Any such disclosure could impede the investigation being conducted.



CLERK OF COURT

Date: June 26, 2020

A handwritten signature in cursive script, appearing to read "James M. Hester".

Signature of Clerk or Deputy Clerk

The name, address, e-mail, and telephone number of the United States attorney, or assistant United States attorney, who requests this subpoena, are:

Tal Chaiken
75 Ted Turner Dr. SW Suite 600 Atlanta, GA 30303
404-581-6000
Tal.Chaiken@usdoj.gov

AO 110 (Rev. 06/09) Subpoena to Testify Before Grand Jury (Page 2)

PROOF OF SERVICE

This subpoena for *(name of individual or organization)* Management Resource Services Inc.
was received by me on *(date)* June 26, 2020 .

☐ I served the subpoena by delivering a copy to the named person as follows: _____

_____ on *(date)* _____ ; or

☐ I returned the subpoena unexecuted because: _____

I declare under penalty of perjury that this information is true.

Date: June 26, 2020

Server's signature

Joseph D. Stites

Printed name and title

2635 Century Parkway NE Atlanta, GA 30345

Server's address

Additional information regarding attempted service, etc:

To:

Management Resource Services Inc.
Attn: Carla J. Jackson
4683 Darlene Way
Tucker, Georgia 30084

ATTACHMENT 1

I. DEFINITIONS

A. "Document(s)" means, without limitation, any handwritten, printed, typed, photographed, recorded, transcribed, taped, filmed, or otherwise reproduced or stored communication or representation, whether comprised of letters, words, numbers, pictures, sounds or symbols, or any combination thereof. This definition includes copies or duplicates of documents contemporaneously or subsequently created which have any non-conforming notes or other markings, including any additions, deletions, alterations, or notations, as well as the backsides of any communication or representation which contain any of the above. "Document" also includes all attachments, enclosures, or other matter affixed to or incorporated by reference within documents responsive to the Document Requests set forth below, including, but not limited to, any pages that show who reviewed, approved or rejected a particular document.

By way of example, "document(s)" includes, but is not limited to: writings; correspondence; memoranda; notes; drafts; records; files; letters; envelopes; messages; electronic mail; electronic messages; analyses; agreements; accounts; working papers; reports and summaries of investigations; trade letters; press releases; comparisons; books; ledgers; journals; bills; vouchers; checks; statements; worksheets; summaries; notices; drawings; diagrams; graphic presentations; instructions; manuals; calendars; diaries; telephone message records or logs; routing slips; activity reports; articles; magazines; newspapers; brochures; guidelines; notes or minutes of meetings or of other communications of any type, including inter- and intra-office or Company communications; reports; plans; questionnaires; forecasts; briefing materials; surveys; charts; graphs; diagrams; compilations; computations; photographs; films or videos; tapes; discs; data cells; databases; spreadsheets; software; bulletins; voice mails; information stored or maintained by electronic data processing or word processing equipment; electronic claims filings; invoices; computer and network activity logs; all other data compilations from which information can be obtained including electromagnetically sensitive stored media such as floppy disks, hard disks, hard drives and magnetic tapes; Web pages; any preliminary versions, drafts or revisions of any of the foregoing; and all attachments to any of the items set forth in this paragraph.

B. "Email" includes but is not limited to: written communications between one or more persons that are sent electronically, via data lines or by wireless technology, instant messages (whether external, i.e., Yahoo! Messenger or internal applications), SWIFT free form text messages (including but not limited to any series x99), electronic messages saved on the hard drives of the computers used by an individual sending or receiving the messages, and messages stored on company servers, internet service provider ("ISP") servers, backup tapes, handheld devices (e.g. a Blackberry), as well as anything necessary to extrapolate data from any of these sources, such as an index, electronic key, or encryption software. "Email" is also defined to include any documents attached to the email.

C. "You" or the "Company" means any and all of the following:

E. Manner of production: All documents produced in response to this subpoena shall comply with the following instructions:

1. You shall conduct a search for responsive documents in a manner sufficient to identify the source and location where each responsive document is found.
2. All documents produced in response to this subpoena shall be segregated and labeled to show the document request to which the documents are responsive and the source and location where the document was found.
3. To the extent that documents are found in file folders, computer disks, hard drives and/or other storage media which have labels or other identifying information, the documents shall be produced with such file folder and label information intact.
4. To the extent that documents are found attached to other documents, by means of paper clips, staples or other means of attachment, such documents shall be produced together in their condition when found.

F. In the event there are no documents responsive to a particular subpoena request, please specify that you have no responsive documents.

G. If you know of documents you once possessed or controlled, but no longer possess or control, which would have been responsive to this subpoena, state what disposition was made of such documents, including identification of the persons who are or are believed to be in possession or control of such documents currently.

H. To facilitate the handling and return of any non-electronic documents, please mark each page with an identifying logo or the first three letters of your company's name and number each page sequentially beginning with "000001," preferably in red or blue ink so that the originals can be easily distinguished from copies. The marks should be placed in the lower right hand corner of each page but should not obscure any information on the document. All documents should be numbered sequentially. All documents should be produced in enclosures bearing the name of your company, the date of the subpoena and the paragraphs of the subpoena to which the documents. Pursuant to this instruction, you shall produce a log stating the source of documents that either corresponds to the numbers placed on the documents (if the documents are non-electronic documents) or that otherwise indicates the source of the documents (that, a log identifying the office and file or other document repository in which each document was located). Use of the foregoing procedure will preserve the identity of all documents submitted by your company and assure their accurate and expeditious return at the conclusion of this investigation or of any proceeding arising from it.

I. If you have knowledge of any document that would have been responsive to this subpoena but has been lost, destroyed, discarded or subject to removal or alteration, you shall identify to the extent possible each such document and provide an explanation of the loss, destruction, discarding, removal or alteration (including identification of each person authorizing or having knowledge of the loss, destruction, discarding, removal or alteration).

J. No document called for by this subpoena shall be destroyed, modified, redacted, or otherwise made inaccessible, except insofar as documents are withheld under claim of privilege in compliance with the instructions above.

K. Please note that you are instructed to provide copies of the production to Assistant United States Attorney Tal C. Chaiken via email at tal.chaiken@usdoj.gov or via mail at:

Tal C. Chaiken
Assistant United States Attorney
U.S. Attorney's Office
75 Ted Turner Drive S.W., Suite 600
Atlanta, GA 30303
Phone: 404-581-6069
Email: tal.chaiken@usdoj.gov

III. APPLICABLE TIME PERIOD

Unless otherwise specified, the applicable time period covered by this subpoena is **January 1, 2019, to the present.**

V. PRODUCTION REQUESTS

- A. All records, books of account and other documents or papers relative to financial transactions of the Company. This includes, but is not limited to, financial records, including receipts, checks, bank and savings and loan records of deposit, withdrawal and wire transfer, statements and other bank records, letters of credit, credit card statements, money orders, cashier's checks, passbooks, cancelled checks, certificates of deposit, loan records, customer account information, income and expense summaries, cash disbursement journals, and financial statements.
- B. All records related to Wells Fargo account 9317161207.
- C. All records related to Paycheck Protection Program applications submitted by the Company. This includes loan applications, documents submitted with the loan applications, and internal and external correspondence related to the applications.
- D. All records related to Paycheck Protection Program funds received by the Company, including records detailing how funds were utilized.

- E. All records related to individuals employed by the Company, including timesheets, dates of employment, and employee files. This includes records in the Company's possession from any and all payroll management entities.
- F. All federal, state and local tax documentation specifically related to the Company and Carla Jackson, including but not limited to IRS Forms 1099, income and payroll tax returns, state sales tax returns and amended tax returns.
- G. All payments made to the following individual and/or entities:
 - 1. Kahlil Green, aka Khalil Green;
 - 2. Bern Benoit, aka Burn Benoit;
 - 3. Andre Gaines;
 - 4. Darrell Thomas;
 - 5. Meghan Thomas;
 - 6. Edward Lee;
 - 7. Dartez Daniel;
 - 8. Carla Jackson;
 - 9. Elite Executive Services Inc.;
 - 10. ATL Promotions Group Inc.;
 - 11. Transportation Management Services Inc.;
 - 12. Gaines Reservation and Travel LLC;
 - 13. Lee Operations LLC;
 - 14. Impact Creations LLC; and
 - 15. Bellator Phront Group Inc.,

including payments made or received directly or through third parties.

- H. All communications with the following individual and/or entities:

- 1. Kahlil Green, aka aka Khalil Green;
- 2. Bern Benoit, aka Burn Benoit;
- 3. Andre Gaines;
- 4. Darrell Thomas;
- 5. Meghan Thomas;
- 6. Edward Lee;
- 7. Dartez Daniel;
- 8. Carla Jackson;
- 9. Elite Executive Services Inc.;
- 10. ATL Promotions Group Inc.;
- 11. Transportation Management Services Inc.;
- 12. Gaines Reservation and Travel LLC;
- 13. Lee Operations LLC;
- 14. Impact Creations LLC; and
- 15. Bellator Phront Group Inc.,

NORTHERN DISTRICT OF GEORGIA

GRAND JURY PROCEEDINGS

GRAND JURY NO. 4-19

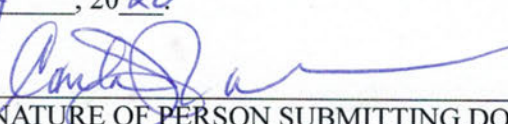
WAIVER OF APPEARANCE
AND
DOCUMENT RECEIPT

I, Carla Jackson, of Tucker, GA,

have custody and control of the documents requested in the attached subpoena. I would prefer that:

- () I will mail the requested documents via USPS mail or FedEx to:
Attn: Grand Jury, U.S. Attorney's Office, Suite 600, 75 Ted Turner Drive SW, Atlanta, Georgia 30303
- () I will email the requested documents to Assistant United States Attorney
- (X) I will email the requested documents to the Grand Jury Clerk at
USAGAN.GrandJury@usdoj.gov.

in lieu of actual appearance by myself. Submission of the requested documents is fully complied with, this 20 day of July, 2020.


SIGNATURE OF PERSON SUBMITTING DOCUMENTS

7/20/2020
DATE

SIGNATURE OF PERSON RECEIVING DOCUMENTS

DATE

SIGNATURE OF GRAND JURY FOREPERSON