

COVER SHEET

TO:	Grand Jury Clerk	FROM:	Andre Gaines
EMAIL:	USAGAN.GrandJury@usdoj.gov	EMAIL:	AGGA INES54@GM AIL.COM
PHONE:		PHONE:	
PAGES:	20	DATE:	07/21/2020
COMMENTS: Production Request-Andre Gaines & Gaines Reservation and Travel LLC			

7/19/2020

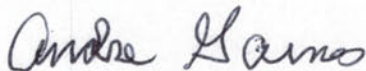
To Whom It May Concern:

Re: Production Request

I, Andre Gaines, owner of Gaines Travel and Reservation, am writing this letter in response to the production requests:

- A. The company's financial records are not accessible; the PNC bank account is frozen.
- B. I do not have a business account with Bank of America.
- C. The PNC bank account is frozen and I'm unable to access the electronic bank statements.
- D. Reference 'Attachment A'.
- E. Reference 'Attachment B'.
- F.
- G. The tax period for 2020 is incomplete; documentation can be provided upon completion of the tax year.
- H. Payments were not made to any of the individuals listed in section H. Money was transferred to Management Resource Services.
- I. Communications were in-person with representatives from Management Resource Services therefore I have no document to produce.

Regards,

A handwritten signature in cursive script, appearing to read "Andre Gaines".

Andre Gaines

NORTHERN DISTRICT OF GEORGIA

GRAND JURY PROCEEDINGS

GRAND JURY NO. 4-19

WAIVER OF APPEARANCE
AND
DOCUMENT RECEIPT

I, Andre Gaines, of Gaines Travel and Reservation,
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
- (X) I will email the requested documents to Assistant United States Attorney
- () 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 19 day of July, 2020.

Andre Gaines
SIGNATURE OF PERSON SUBMITTING DOCUMENTS

DATE_____
SIGNATURE OF PERSON RECEIVING DOCUMENTS_____
DATE_____
SIGNATURE OF GRAND JURY FOREPERSON

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

I, Andre Gaines, 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 Gaines Travel Reservation ("Company"), and my title is CEO. 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 _____ . 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).

7/19/2026
Date

Andre Gaines
Signature

UNITED STATES DISTRICT COURT

for the
Northern District of Georgia

SUBPOENA TO TESTIFY BEFORE A GRAND JURY

To: Gaines Reservation and Travel LLC
Attn: Andre Gaines
85 Rosemont Court
Hiram, GA 30141

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

James M. Hatten
Signature of Clerk or Deputy Clerk

Date: June 26, 2020

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

PROOF OF SERVICE

This subpoena for *(name of individual or organization)* Gaines Reservation and Travel LLC
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: