

The following is the PDF of an official transcript.

Official transcripts may be filed in CM/ECF only by the Official Court Reporter and will be restricted in CM/ECF for a period of 90 days.

You may cite to a portion of the attached transcript by the docket entry number, referencing page and line number, only after the Court Reporter has filed the official transcript; however, you are prohibited from attaching a full or partial transcript to any document filed with the Court.

- - -

Stenographic Court Reporter note:

**No AI technology was used in the preparation of this
Official Certified U.S. District Court transcript.**

- - -

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,
vs.

DOCKET NO.
1:20-CR-00296-JPB-5-20
VOLUME 6 (AM SESSION)

CARLA JACKSON and
TELDRIN FOSTER,

Defendants.

TRANSCRIPT OF JURY TRIAL PROCEEDINGS
BEFORE THE HONORABLE J.P. BOULEE
UNITED STATES DISTRICT COURT JUDGE
MONDAY, FEBRUARY 12, 2024

Appearances:

For the Government: Tal C. Chaiken, Esq.
Samir Kaushal, Esq.
Babasijibomi Moore, Esq.

For Defendant Jackson: David D. Marshall, Esq.

For Defendant Foster: Leigh Ann Webster, Esq.
Saraliene Durrett, Esq.

Court Reporter: Judith M. Wolff, CRR
Official Court Reporter
1914 United States Courthouse
75 Ted Turner Drive, S.W.
Atlanta, Georgia 30303-3361
(404) 215-1317
judith_wolff@gand.uscourts.gov

STENOGRAPHICALLY REPORTED OFFICIAL COURT TRANSCRIPT

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

(Court was called to order at 9:45 a.m.)

THE COURT: You all can have your seats.

Thank you.

I hope everyone is well this morning. Good to see you all.

MR. MARSHALL: Good morning, Judge.

THE COURT: All right.

I guess first and foremost, for discussion before we bring in the jury -- and Officer, if you'll check in, in maybe five to ten to see if we have got all our jurors, and let me know, I'd appreciate it.

It would be my intent to bring them out at 10:00 if they are all here and just get rolling, whether or not we have completed our discussion of our other issues.

COURT SECURITY OFFICER: Yes, sir.

THE COURT: Thank you.

But I think first and foremost is the government's motion to admit evidence of codefendants's guilty pleas.

I take from the fact that I received responses and a reply that you all weren't able to work out some type of agreement on this.

Why don't we take just a few minutes a side just for you to recap what you think your strongest points are.

1 And again, I think the record will have many of your detailed
2 arguments but again, Ms. Chaiken, it's your motion so I'll
3 let you go first.

4 MS. CHAIKEN: Thank you, Your Honor.

5 So I want to take one step back because we have
6 been thinking a lot about how we got to this point where this
7 is the defense that the defense has introduced that has, we
8 think, opened the door.

9 I sent a case to the Court this morning, United
10 States v. Baptiste. It's a 2019 published Eleventh Circuit
11 case that addresses reverse 404(b) evidence, which is
12 basically when the defense tries to introduce evidence of a
13 wrong by another person.

14 And that case involved a situation where the
15 defendant was indicted in a fraudulent check cashing scheme,
16 and his defense was that his business partner had duped him
17 into participating in the scheme and he had thought that it
18 was all aboveboard. And he wanted to put in evidence that
19 this business partner had previously duped other people into
20 participating in similar check cashing schemes.

21 And the Eleventh Circuit said there are basically
22 two ways to view that evidence. One is the business partner
23 has done it before and therefore he has the capacity to do it
24 again, which would be admissible under Rule 404(b) to show
25 that the business partner was capable of duping someone into

1 a scheme in that way.

2 The second way of looking at the evidence was that
3 it was introduced to show that the business partner had a
4 propensity of duping people or of deceiving people and
5 therefore likely deceived the defendant in this case. And
6 the Eleventh Circuit said that's not a permissible purpose.

7 And here, I think, based on what the defense has
8 said and based on the testimony that they have elicited, it's
9 entirely a propensity defense because there is no evidence
10 that Darrell Thomas has ever taken over someone's WhatsApp
11 account, taken over their email account, impersonated someone
12 in order to frame them in a fraud.

13 All there is is evidence that he is a liar and that
14 he has used people's names on documents without their
15 knowledge. And that's not what we have presented as to
16 Teldrin Foster.

17 It's not something where, if that's true, that
18 Darrell Thomas used Brenda Miller's name on a Secretary of
19 State filing, it shows that he has the capacity to have taken
20 over Teldrin Foster's entire internet persona in order to
21 commit this fraud.

22 So I think the entire defense based on this case
23 law is not permissible under Rule 404(b). I think the
24 Baptiste case makes that clear.

25 And because that's the defense that's been

1 asserted, we're in this situation that's sort of uncharted
2 territory and that's why there aren't cases on point that
3 address this admission of guilty plea issue in this context,
4 because there really aren't cases where a defendant has been
5 allowed to put on this kind of propensity evidence and imply
6 that their codefendant or their business partner or whoever
7 has tricked or deceived other people in order to prove that
8 he has tricked or deceived him or impersonated him.

9 So there just aren't cases on point, Your Honor,
10 because this is not a defense that is permissible under Rule
11 404(b).

12 Obviously, generally, when this type of evidence
13 comes up, it's in the context of a cooperator who is
14 testifying and there is questioning that opens the door to
15 the suggestion that maybe they got off scot-free or that they
16 didn't plead guilty.

17 We just didn't find cases, one way or the other,
18 addressing this situation where a defendant puts at issue a
19 codefendant's deception.

20 THE COURT: Off the record.

21 (Off-the-record discussion, and proceedings
22 continued:)

23 THE COURT: Back on the record.

24 MS. CHAIKEN: So, Your Honor, what we have here now
25 is a situation where the defense has suggested to the jury --

1 THE COURT: One moment.

2 Back on the record.

3 MS. CHAIKEN: So we have now a situation, Your
4 Honor, where the defense has very clearly said that their
5 defense is Darrell Thomas is a liar, Darrell Thomas is
6 someone who uses deception, Darrell Thomas is someone who
7 uses other people's names on documents when it benefits him.

8 And the defense has tried to slice and dice and
9 say, well, our questioning about the codefendants was a
10 separate line of questioning from our questioning about
11 Brenda Miller. But the jury doesn't consider each line of
12 questioning and what it may suggest in a vacuum. The jury is
13 listening to the testimony as a whole.

14 And what the jury has heard is that many of the
15 codefendants did not speak to Darrell Thomas, and then right
16 after that they heard that Darrell Thomas puts people's names
17 on things without their knowledge.

18 And there really was no purpose for that testimony
19 to come in. There was no need for the jury to know that
20 those people were charged, and in fact, we filed a motion in
21 limine to preclude any reference to charging decisions.

22 But all of those same questions could have been
23 asked as what was Kahlil Green's role? What was Ryan
24 Whittley's role?

25 There was no need to start off that line of

1 questioning with how many people were charged and were all of
2 these people charged? Whether or not they were charged is
3 completely irrelevant to the question of whether they were
4 involved and what their involvement was.

5 And we see no purpose to have brought that in,
6 other than to make the point that all these people were
7 charged despite having had no communication with Darrell
8 Thomas, leading straight into "Darrell Thomas is a liar to
9 puts people's names on things."

10 So we think the implication has clearly been made
11 to the jury and the impression has clearly been left with the
12 jury that there are people who have been charged in this case
13 who did not deal with Darrell Thomas and that Darrell Thomas
14 uses people's names without their knowledge.

15 And the only -- I don't think the defense really
16 contradicted that. And the only thing that they really
17 raised is a confrontation clause issue, I think. And we are
18 not seeking to admit any testimonial statements by any
19 codefendant. We are just seeking to admit the fact of their
20 guilty plea.

21 The jury doesn't need to know that they admitted --
22 that they pleaded guilty to conspiracy with Teldrin Foster or
23 that Teldrin Foster was a part of that conspiracy. The jury
24 just needs to know that they admitted their own guilt in the
25 PPP fraud, in order to eliminate the misimpression that any

1 of those people were duped, were lied to, were deceived, were
2 victims of identity theft.

3 And I think Mr. Foster's motion or response makes
4 clear that there really isn't a confrontation clause issue
5 because they say if we had a plea agreement for Brenda
6 Miller, we could introduce that. And Brenda Miller is not a
7 witness in this case. Brenda Miller is not testifying.

8 And they said, well, we imply that Brenda Miller
9 had nothing to do with it, and so if you have a plea
10 agreement for Brenda Miller, you can introduce it. And
11 that's exactly what we're trying to do with the codefendants.

12 THE COURT: All right. Let me hear from the
13 defense.

14 MS. WEBSTER: Yes, Your Honor. Thank you.

15 I have a number of responses.

16 I think first that the -- this entire argument is
17 based on sort of what I would consider a misreading of the
18 transcript or inaccurate description of the testimony that
19 was elicited.

20 To start out with, specifically I asked about
21 Darrell Thomas's role in the offense and then I clarified
22 that he communicated with the recruiters and then said: He
23 was the one communicating with all the business owners or
24 were they sometimes communicating with the recruiters?

25 And then, most of the time, through the recruiters.

1 So that establishes that Darrell Thomas is not the
2 primary one communicating with the business owners --

3 THE COURT: Can you slow down just a little bit,
4 Ms. Webster?

5 MS. WEBSTER: Yes, I can. Thank you.

6 THE COURT: For both the court reporter and for me.

7 MS. WEBSTER: Yes.

8 THE COURT: Thank you.

9 MS. WEBSTER: So they, the line of -- that
10 questioning there, I think, addresses the government's
11 concern which is that there is some implication that because
12 Darrell Thomas was not communicating with the business owners
13 and their identities must have been stolen, that was never --
14 I think those few questions make clear that he was not always
15 communicating directly with people, but there was no
16 implication that therefore they were not involved.

17 And when I went through the people in the
18 indictment, I did what the government asked, and asked what
19 their role was.

20 And then when the questions that I -- that they
21 appear to be concerned about, which are did the -- did this
22 person communicate with Darrell Thomas? That wasn't the end
23 of the question, the question was -- or the questions were:
24 Did they communicate with Darrell Thomas or did they
25 communicate with someone else in the indictment?

1 So it was just to sort of like lay out the chain of
2 communication. There wasn't any implication that the people
3 who have been charged were not involved.

4 Second of all --

5 THE COURT: You just said there wasn't any
6 implication that the people who have been charged were not
7 involved?

8 MS. WEBSTER: I don't think I implied that at all.

9 When I -- when I was questioning the witnesses -- I
10 mean, questioning the agent about the role of the other
11 people who were charged in the case, I asked sometimes if
12 they communicated with Mr. Foster, right, and sometimes I
13 asked if they communicated directly with Darrell Thomas or if
14 they communicated with someone else --

15 THE COURT: What about, I guess it wasn't a
16 question. I think it was maybe in response to an objection
17 when in front of the jury you noted that Thomas's modus
18 operandi was to do this.

19 That's more than an implication, isn't it? That's
20 a direct statement to the jury that that's what was going on.

21 MS. WEBSTER: But that was in response to the
22 Brenda Miller evidence when the government objected.

23 So I feel like I have to -- if the government
24 wanted us to approach for the jury not to hear the response,
25 then we could have. But there was an objection made and I

1 was responding to the objection. And that wasn't about any
2 of the codefendants.

3 And going to the codefendants, which is what is the
4 subject of the government's motion, those codefendants are
5 all charged with conspiring with Mr. Foster.

6 So it is entirely relevant and admissible and
7 proper for me to question them or to question the witness if
8 they had evidence that those codefendants had communicated
9 with Mr. Foster.

10 And just to let the jury know who those people are
11 because the government had not -- the government had not
12 introduced evidence about other people, but they are the
13 people that he is supposed to have participated in a
14 conspiracy with. So I think it is entirely fair for the jury
15 to hear who they are and to understand their roles in the
16 offense.

17 I would note that as to my -- going back to my
18 response to the government's objection, the jury will be
19 instructed, and I believe has already been instructed, that
20 statements of counsel are not evidence. That is not in
21 dispute. So I think that would eliminate any potential harm
22 from that.

23 But I think that the case law is clear that you
24 cannot introduce the codefendant's convictions when they are
25 not testifying.

1 THE COURT: Well, case law is very clear that
2 normally you don't do that. This is not a normal situation,
3 as Ms. Chaiken has argued.

4 Let me hear from Mr. Marshall.

5 MR. MARSHALL: Judge, the only thing I'd add, I'd
6 move to adopt the arguments that Foster has put forth.

7 But as the government's motion addressed
8 Ms. Jackson, it just addresses an issue or some statements I
9 made in our opening statement. Number one, that the
10 government's investigation was sloppy.

11 My motion to adopt -- that reference to a sloppy
12 investigation was solely related to the government's improper
13 drafting of Count 46 in three separate indictments.

14 They charged it -- they alleged that it was a wire,
15 it was wire fraud and a wire transaction when, in fact, it
16 was a check that was deposited at a bank, in branch.

17 So I just pointed that out to the jury early on.
18 That has nothing to do with bringing in plea agreements of
19 other codefendants or anything like that. It just doesn't
20 address any of that.

21 And then the second argument was I did make a
22 reference in opening to Mr. John Gaines pleading out. He is
23 on our witness list. We intend to call him as a witness and
24 those are questions I will put forth, so there is no
25 confrontation issue to be able to answer things. I mean, the

1 government can cross him.

2 And then I also made a reference to -- I
3 anticipated that the government would be calling Darrell
4 Thomas. He was on their list of parties that were read out
5 to the jury. We had PSR materials turned over to us for
6 prospective cooperating witnesses by the government early on
7 that included Darrell Thomas.

8 So it was my belief that they would probably call
9 him. So there was a reference to a plea agreement by Darrell
10 Thomas.

11 And that's the extent of our statements during
12 opening arguments, Judge.

13 THE COURT: All right.

14 Ms. Webster, let's take a hypothetical scenario in
15 which I agree with Ms. Chaiken on this.

16 You don't want me to admit the guilty pleas. What
17 else would you have me do, short of that?

18 MS. WEBSTER: Are you anticipating introducing the
19 convictions of every single codefendant that was mentioned in
20 cross-examination?

21 THE COURT: I'm asking you what you would have me
22 do other than what Ms. Chaiken has suggested doing?

23 MS. WEBSTER: Can I have one second?

24 (Pause.)

25 THE COURT: Officer, do we have the jurors?

1 COURT SECURITY OFFICER: Yes, Your Honor.

2 THE COURT: All right. We'll rejoin this issue
3 later.

4 Let's bring out the jury.

5 Investigator Stites, you can come up and get on the
6 stand.

7 Thank you.

8 (Jury enters the courtroom at 10:06 a.m.)

9 THE COURT: You all can be seated.

10 Thank you.

11 Good morning, ladies and gentlemen. Thank you for
12 being back, and thank you for being on time. It's greatly
13 appreciated.

14 Ms. Webster, you can continue your
15 cross-examination with Special Agent Stites.

16 MS. WEBSTER: Thank you, Your Honor.

17 CONTINUED CROSS-EXAMINATION

18 BY MS. WEBSTER:

19 Q. Agent Stites, can you tell me when you began this
20 investigation?

21 A. I'm not exact sure of the exact opening, but it was
22 sometime in April of 2020.

23 Q. Okay. Thank you.

24 And your work on the case is still ongoing?

25 A. Yes.

1 Q. And as part of your duties, you collect information
2 related to the targets of the investigation; is that right?

3 A. Yes.

4 Q. Sometimes you get that from other agents?

5 A. Yes.

6 Q. Okay. And sometimes you might get it from other
7 agencies?

8 A. Correct.

9 Q. In this case, you learned that Secret Service had
10 also conducted some investigation into a relevant party; is
11 that right?

12 A. Yes.

13 Q. And there was at least one interview. Yes?

14 A. Correct.

15 Q. And that was of Amanda Christian?

16 A. Yes.

17 Q. On -- in August of 2020?

18 A. I'm not quite sure of the time frame of the
19 interview, but I think you showed me the document before.
20 That sounds about right.

21 Q. Okay. And it was about the loan associated with
22 Advertising and Then Some?

23 A. Yes.

24 Q. And that's one of the loans that's charged in this
25 indictment?

1 A. Yes, it is.

2 Q. And you got the report from her interview; is that
3 correct?

4 A. Yes.

5 Q. Okay. And you reviewed that document?

6 A. I did.

7 Q. Okay. Because that was relevant to your
8 investigation. Yes?

9 A. It was part of the -- one of the loans we were
10 looking at, yes.

11 Q. Okay. And you wanted to see what she said about
12 that loan?

13 A. Yes.

14 Q. And you wanted to see if she had provided truthful
15 information.

16 A. Yes.

17 Q. Okay. And in that statement, she suggested that --

18 MS. CHAIKEN: Objection, Your Honor. Hearsay.

19 MS. WEBSTER: Your Honor, I think I have laid the
20 foundation to show the effect on the investigation.

21 THE COURT: I think the issue I was having earlier
22 was the timeframe of that review. I thought that's what we
23 discussed. I thought it was still an open issue.

24 So do you want to try to develop that?

25 MS. WEBSTER: I'm sorry. The time frame of the

1 interview versus the investigation?

2 MS. CHAIKEN: Your Honor, there is another issue as
3 well.

4 Could we approach?

5 THE COURT: Sure.

6 Ladies and gentlemen of the jury, if you would step
7 out for a moment, please.

8 (Jury withdrew from the courtroom at 10:10 a.m.)

9 THE COURT: You all can be seated.

10 All right. Well, didn't take long to circle back
11 to this knotty issue.

12 Yeah. I thought the whole -- I thought what I told
13 you was, last week, after we debated this for what seemed
14 like an hour, was I wasn't yet clear on when he reviewed that
15 transcript.

16 And if it was during his investigation, your
17 relevance might be high, versus if he reviewed it two weeks
18 before trial when he was getting a bunch of stuff in from
19 somebody else that didn't affect his investigation, the
20 relevance might be next to nil, which would have a pretty
21 heavy effect on how we came out on 403, eventually.

22 And you just rejoined the issue, but I still don't
23 have any details as to when he would have looked at this.

24 MS. WEBSTER: I understand, Your Honor.

25 THE COURT: Let me hear from Ms. Chaiken. She has

1 something to say as well.

2 MS. CHAIKEN: Your Honor, I think everyone agrees
3 that Amanda Christian's statements in the interview are
4 hearsay.

5 My understanding is that the defense wants to offer
6 those statements to show the effects on the investigation.
7 And when somebody wants to show the effects on investigation,
8 the way they do that is to say, "Did you interview John Doe
9 or did you review an interview with John Doe?" or whatever.
10 And the person says "yes."

11 And then the next question would be, "Based on that
12 interview, what did you do next, or did you do anything?"

13 And then they may say, "I called so-and-so" or "I
14 went and interviewed so-and-so."

15 The implication would be John Doe told me that I
16 should go talk to so-and-so, and then I went and did that.

17 But to say Didn't Amanda Christian say Foster
18 called her? and then Did you do anything based on that? is
19 not showing any effect on the investigation or any effect on
20 the listener.

21 And as the Court, I think, explained last week when
22 we were discussing this issue, it's not a hearsay -- a
23 non-hearsay purpose to show the lack of effect on the
24 investigation because then Ms. Webster could put literally
25 anything in the entire world in front of Agent Stites and

1 say, "Did you read this newspaper article? Did it have an
2 affect on your investigation?"

3 "No."

4 Doesn't this newspaper article say whatever?

5 So if she wants to show an effect on the
6 investigation, she can ask him: After you reviewed the
7 interview of Amanda Christian, did you do anything in your
8 investigation?

9 And then he'll answer that, whether he did or did
10 not do anything in his investigation, and that would show the
11 effect on the investigation without putting before the jury
12 the actual hearsay statement, which is just hearsay.

13 THE COURT: All right. And we still haven't
14 established -- maybe we can do it outside the presence of
15 jury.

16 Just establish when he would have reviewed this,
17 Ms. Webster, and then we can go from there.

18 Maybe you can make a proffer as to how you are
19 going to go about this and how far you intend to go or
20 whether you intend to stay within the limits that Ms. Chaiken
21 has explained are normal.

22 Go ahead. Let's just do a proffer.

23 PROFFER

24 BY MS. WEBSTER:

25 Q. Agent Stites, if the interviewed happened in August

1 of 2020, do you know about when you would have received that
2 document?

3 A. I don't know the exact timing of receiving that
4 document. I would imagine it was somewhere between August
5 and December sometime.

6 Q. Of 2020?

7 A. I would guess.

8 Q. Okay. And that's before Mr. Foster was charged in
9 this case; right?

10 A. Yes.

11 Q. And before he was interviewed? He was interviewed
12 in December of 2020; is that right?

13 A. I don't remember when I reviewed the document, to
14 be honest with you.

15 Q. Okay. And so it was produced to us in discovery;
16 that's correct? Yes?

17 A. Correct.

18 Q. Okay. And that discovery was provided in August of
19 2021; is that right?

20 A. Can you repeat that?

21 Q. That discovery was produced in August of 2021?

22 A. Yeah, I don't remember the date of when the
23 discovery was produced. But if that's when you got it, then
24 I'll agree with that.

25 Q. Okay. And it was in the discovery that we received

1 at that time, so you had to have it before we received it?

2 A. Yes.

3 Q. And that's several years prior to this trial; is
4 that correct?

5 A. Yes.

6 Q. Did you review it once you received it, or did you
7 get it and let it sit for a while?

8 A. I would have probably looked at it when the agent
9 from the Secret Service sent it to me.

10 Q. Okay.

11 MS. WEBSTER: Your Honor, I think that addresses
12 the timeline issue.

13 Do you want me to ask the remaining questions that
14 I planned on asking?

15 THE COURT: Yes.

16 MS. WEBSTER: Okay.

17 THE WITNESS: What exhibit is that?

18 MS. WEBSTER: It's not marked as an exhibit.

19 THE WITNESS: You handed it to me the other day.
20 Do you have that?

21 MS. WEBSTER: I can show it to you.

22 BY MS. WEBSTER:

23 Q. I have it on my laptop. (Hands document to
24 witness.)

25 A. Did you hand it to me on a piece of paper last

1 time?

2 Q. I did. I just don't have it right now.

3 A. Okay.

4 It was August. I was just confirming the dates and
5 times.

6 Q. Okay. So, Agent Stites, when you received that
7 report, you reviewed it; is that correct?

8 A. Yes.

9 Q. Okay. And then what actions did you take after
10 reviewing that statement, or based on receiving that
11 statement?

12 A. The full statement? I mean, we had already known
13 about this loan, so our intention was to interview
14 Ms. Christian. And I think we interviewed her a couple
15 times.

16 Q. And did the fact that she had identified someone
17 with the last name Foster in a way that was not true give you
18 pause?

19 A. Honestly, I don't recall. But I don't believe so
20 because, even reading it here, it's referencing CDC Finance
21 and an individual named Foster.

22 Q. Okay. But there is no indication that that
23 statement is actually true?

24 A. We -- at this point I don't know if we knew what
25 was true with Ms. Christian. I don't know that we had

1 interviewed her yet.

2 THE COURT: All right. Is that about it,
3 Ms. Webster?

4 MS. WEBSTER: That's about it.

5 THE COURT: I'm going to overrule the objection.
6 Let's bring out the jury.

7 I'll let you lay that additional foundation as to
8 timing and ask those limited questions.

9 Officer, if we could bring out the jury.

10 Thank you.

11 (Jury enters the courtroom at 10:20 a.m.)

12 THE COURT: All right. You all can be seated.

13 The objection is overruled.

14 Ms. Webster, you can go ahead.

15 MS. WEBSTER: Thank you, Your Honor.

16 BY MS. WEBSTER:

17 Q. Agent Stites, were you able to confirm that the
18 interview was in August of 2020?

19 A. Yes.

20 Q. Okay. And did you receive the interview
21 thereafter?

22 A. Sometime thereafter, yes.

23 Q. Okay. And would you have received it in 2020?

24 A. I believe so, but I don't know exactly the
25 timeframe.

1 Q. Okay. And when you received it, you would have
2 reviewed that statement; is that right?

3 A. Yes.

4 Q. Okay. And you are aware that, in that statement,
5 Ms. Christian identified someone with the last name of Foster
6 as being involved; is that correct?

7 A. Yes.

8 Q. Okay. And she said that's when she sort of figured
9 out this was a scam whenever someone with the last name of
10 Foster called her; is that right?

11 A. She purported that she felt like it was a scam when
12 somebody called her representing to be from the CDC Finance,
13 or the lender. And she said the individual's last name was
14 Foster, and the first name, didn't know.

15 Q. Thank you. And to your knowledge, is that
16 accurate?

17 A. I don't believe so.

18 Q. Okay. And once you got that statement, did you
19 take any actions as a result?

20 A. Not specific to that statement. This was a loan
21 that we had already identified. It just so happened the
22 Secret Service had also identified it as a loan. So when we
23 found out that the Secret Service had interviewed
24 Ms. Christian, that's when I reached out to that individual
25 and got the interview and the information.

1 And then our next step was really just to interview
2 Ms. Christian.

3 Q. Thank you.

4 I know it's been several days now, but do you
5 remember last week on direct you testified about a number of
6 clips from your interview with Mr. Foster; is that right?

7 A. Can you be more specific?

8 Q. On direct, you discussed Mr. Foster's statement
9 that he made --

10 A. Yes. On direct. On direct. Sorry. I was
11 thinking about on cross.

12 Q. Yes. So on direct.

13 And I just want to lay out the timeline for that
14 interview a bit.

15 So the day before you spoke with Mr. Foster, you
16 had interviewed Gena Pyfrom-Foster; is that correct?

17 A. Yes.

18 Q. Okay. And you told Ms. Pyfrom-Foster that you
19 wanted to speak with Mr. Foster; is that right?

20 A. We told her -- we asked her if she thought
21 Mr. Foster would talk to us and she said she would ask him.
22 And I said, if he's willing to talk to us, have him give me a
23 call. Here's my number.

24 Q. Okay. And did he call you?

25 A. He did.

1 Q. So he agreed to come in for a statement?

2 A. He agreed to come in and meet with us, yes.

3 Q. And you don't know what sort of conversation that
4 Mr. Foster had with Ms. Pyfrom-Foster at that point?

5 A. I don't know.

6 Q. But he agreed to come down and meet with you and do
7 the interview?

8 A. Yes.

9 Q. He did not have a lawyer at that time?

10 A. No.

11 Q. You didn't tell him he could get one?

12 A. No.

13 Q. And you didn't tell him he should get one?

14 A. No.

15 Q. And it's often more difficult for you to interview
16 people once they have lawyers; is that right?

17 A. If they represent that they have an attorney, then
18 we will generally coordinate with their attorney and try to
19 bring them in on an interview with U.S. Attorney's Office,
20 their attorney, as well as the agents investigating the case.

21 Q. There is a little bit more of a process involved;
22 is that right?

23 A. Yes.

24 Q. So you never advised him that his statements would
25 be played at a trial like this; right?

1 A. Not at the time, no.

2 Q. Okay. Was there another time when you advised him?

3 A. No.

4 Q. Okay. You never told him that he wasn't required
5 to speak to you?

6 A. No.

7 Q. Okay. So he came down for the interview; right?
8 And you spoke with him for a long time.

9 A. Just a little over two hours.

10 Q. Okay. So over two hours. And we have heard some
11 clips from that interview; right?

12 A. Yes.

13 Q. Okay. And specifically we had heard clips where
14 Mr. Foster told you that he had received 50- to \$60,000 from
15 Darrell Thomas?

16 A. Yes.

17 Q. Okay. And he told you a little bit more about
18 those statements; is that right? Or those payments?

19 A. Yes.

20 Q. Okay.

21 MS. WEBSTER: Your Honor, I would plan to play the
22 portions that you had previously authorized under the rule of
23 completeness, which have been marked as F40A through F40E at
24 this time.

25 (Audio was played.)

1 COURT SECURITY OFFICER: Your Honor, it's not
2 working.

3 THE COURT: Okay. Ms. Lee.

4 COURTROOM DEPUTY: Sorry. I did check it.

5 THE COURT: That's okay.

6 Thank you, Ms. Lee.

7 (Pause.)

8 BY MS. WEBSTER:

9 Q. So in that statement -- I'm going to replay it for
10 the jury.

11 A. I was struggling to hear it. It was hard to
12 understand, to be honest with you.

13 (Audio was played.)

14 BY MS. WEBSTER:

15 Q. Were you able to understand that, Agent Stites?

16 A. It was hard. I don't know how the recording was
17 made; it just seemed a little unclear. But I heard him say
18 he was hustled.

19 Q. Okay. And is it fair to say that Mr. Foster said
20 that he had met Darrell Thomas and some other people that
21 were supposed to be his business partners previously and they
22 had hustled him?

23 A. Yes.

24 (Audio was played.)

25 BY MS. WEBSTER:

1 Q. Agent Stites, I know that is difficult to hear.

2 A. Yes. I don't know why, but it is hard to, it's not
3 real clear.

4 Q. Can you just read these for us. (Hands document to
5 witness.) That's the one --

6 A. Starting at the top?

7 Q. Yes.

8 A. Okay.

9 "Mr. Foster says: Not just the barber shop. Just
10 like what my record label would do with the nightclub and
11 stuff like that.

12 "Agent Stites: Okay.

13 "Mr. Foster: So they was saying like, well, we can
14 do this, we can do this. We can help build this out, build
15 this out, help to get like little -- like once they put the
16 credit on there to help you get established. So I fell for
17 it. It was giving me \$1,000 here, \$2,000 here. This, this
18 and the third. All the while the dude was hustling me
19 because, on the other end of it, he didn't even have no
20 money. He ain't even got no business. He don't got nothing.

21 "Agent Stites: Okay."

22 BY MS. WEBSTER:

23 Q. Okay. I'm playing what is marked as F40C, which
24 should be the next transcript.

25 (Audio was played.)

1 THE COURT: I can't understand that. I'm sure the
2 jury can't either. Why don't we just do a Q and A from the
3 transcript.

4 You can play it if you want, but I don't think
5 anybody's going to be able to understand that.

6 If you would like to play it and then have him read
7 it, that's fine, for completeness. But if all you are going
8 to do is play it, I think that's going to be problematic
9 because I don't understand what they are saying.

10 MS. WEBSTER: Sure. I understand, Your Honor. I
11 did not anticipate this not being understandable.

12 So, Your Honor, I think we would move to admit F40A
13 through E, which I think has been pursuant to your order, and
14 then we can have the agent read it. And then, that way, the
15 jury will have it and they can listen to it.

16 THE COURT: We don't need to admit it. We can just
17 play it like we have been doing. It wouldn't be any
18 different.

19 I mean, we haven't admitted the transcripts of all
20 the others, have we?

21 MS. CHAIKEN: No, Your Honor. And the transcript
22 is not evidence.

23 THE COURT: I don't think we are going to
24 piecemeal, play a hundred different snippets of tape and
25 admit one of them but not have admitted all the other ones.

1 So what I'm suggesting is that given that we have
2 some audio issue this morning in the courthouse, instead of
3 playing that tape -- and you are welcome to play the tape as
4 well, if you would like. But from my impression, it's fairly
5 inaudible and hard to understand.

6 What I'm suggesting is what you can do is just do a
7 Q and A and read the lines with the witness or read it into
8 the record as to what was said.

9 To the extent you want the value, if any, of the
10 actual audio, you are welcome to play that as well.

11 But we're not going to admit just the transcript of
12 this without going back and admitting the transcript of a
13 hundred other things we have had transcripts of.

14 That wouldn't be fair.

15 MS. WEBSTER: I'm sorry, Your Honor. I wasn't
16 clear. I didn't mean that I wanted to admit the transcripts.
17 I just wanted to make sure that the actual audio clips are
18 admitted into evidence.

19 THE COURT: Yes.

20 (Defendant's Exhibit F40A through F40E admitted
21 into evidence.)

22 BY MS. WEBSTER:

23 Q. Agent Stites, so I will not play this because I
24 agree that it is not comprehensible at this point.

25 But can you please read the remaining transcripts?

1 They are short.

2 A. Okay. So you want me to read the second one now?

3 Q. Yes.

4 A. Okay.

5 "Agent Stites: And that's how much you think you
6 paid him?

7 "Mr. Foster: I paid him -- or, I paid him?

8 "Agent Stites: Yeah. You said you got your money
9 back, so that means --

10 "Mr. Foster: No. All the -- how they manipulated
11 shit to fuck me, fuck over me all the while.

12 "Agent Stites: You think you paid him over 45 or
13 50 grand when he was fucking you over?

14 "Mr. Foster: Him and the dude David.

15 "Agent Stites: Okay.

16 "Mr. Foster: Yeah, the dude David.

17 "Agent Stites: And you think you got that money
18 back from him?

19 "Mr. Foster: Nope. They owe more amount that he
20 owed me.

21 "Agent Stites: How much did you get back from him,
22 do you think?"

23 Q. Can you read the next one, please.

24 A. "Mr. Foster: I'm thinking between 30 plus, 30
25 plus, altogether, probably. I would say, at the most, 60 but

1 between 50 and 60.

2 "Agent Stites: Okay.

3 "Mr. Foster: But that was for something else
4 'cause I was telling him that we could go in on like doing
5 the promotion shit at the clubs and shit like that. But the
6 thing about it was he bullshitted so much, talking about
7 some, oh yeah, man, you know, they are holding this and they
8 are holding that and they are holding this or whatever.

9 "But you know, I put some money in the stock, you
10 know. I hit the stock market for such-and-such money.
11 That's when me and him fell out because that's when I knew he
12 had money.

13 "How the fuck you gonna put 30 grand in the stock
14 market in two or three weeks and make four hundred and some
15 thousand dollars, and he's talking crazy shit.

16 "His appearance, you know, like his appearance
17 changed, like, shit, he went to having shit that I know like
18 he didn't hit no fucking stock market."

19 Q. Okay. Can you read the next one, please?

20 A. "Mr. Foster: 'Cause when I met him, like 2016, when
21 I came into my retirement money --

22 "Agent Stites: Yeah, right. How much?

23 "Mr. Foster: They fucked me out of probably like
24 \$90,000.

25 "Agent Stites: 90?

1 "Mr. Foster: Not at one time. It was like through
2 a period of time.

3 "Agent Hale: What retirement money?"

4 Q. Is there one more, or is that the last one?

5 A. "Agent Stites: Then shed some light on this for
6 us.

7 "Mr. Foster: Okay. I met Darrell and some people
8 that, quote/unquote, were business partners but years ago.

9 "Agent Stites: Okay.

10 "Mr. Foster: And they hustled me."

11 Q. So the payments that we, or that you discussed on
12 direct, Mr. Foster never said that they were for his
13 participation in a PPP fraud scheme; is that right?

14 A. He was saying that it was payback money for when he
15 was hustled.

16 Q. Okay. And he said that he had invested his
17 retirement money with Darrell Thomas and a guy named David;
18 is that right?

19 A. Yes.

20 Q. Okay. And that they had hustled him out of up to
21 \$90,000?

22 A. Yes.

23 Q. Okay. And he said that Darrell Thomas had told him
24 that he had actually hit it big in the stock market?

25 A. Yes.

1 Q. Okay. Okay.

2 So during the statement, it was you; correct? You
3 were there?

4 A. Yes.

5 Q. Okay. And there was another agent there; is that
6 right?

7 A. Yes. Agent Hale, who is with the IRS.

8 Q. Okay. And is it fair to say that he came in very
9 skeptical that Teldrin Foster knew how to do any tax forms?

10 A. That's fair to say.

11 Q. Okay. I think so skeptical at one point that you
12 sort of told Mr. Foster you were going to give him a test and
13 have him fill out a form?

14 A. Agent Hale said he was going to go get, I believe,
15 a 940 and a 941 form and bring it in to see if he even knew
16 what it was.

17 Q. And at some point you or Agent Hale asked him if he
18 knew what a 944 was; is that right?

19 A. I think the question was Does he know what a 940 is
20 for?

21 Q. Okay.

22 A. It was miscommunicated.

23 Q. Okay. And was there a point at which you or Agent
24 Hale asked Mr. Foster why you, what value do you add to this?

25 A. We asked him that when Mr. Foster was saying that

1 he was just receiving emails and forwarding them back and
2 wasn't -- saying he wasn't doing anything with them and he
3 was just looking at them.

4 Q. And you knew at this time that Ms. Pyfrom-Foster
5 was an IRS employee; is that right?

6 A. Yes, we did.

7 Q. Had she been an IRS employee for quite a while at
8 that point, or do you know?

9 A. I think she had -- I can't remember the exact
10 amount of time. But she had been for a few years, for sure.

11 Q. Okay. So was it fair to say that you believed she
12 would be more familiar with the IRS processes than
13 Mr. Foster?

14 A. Yes. That was sort of the going-in impression.

15 Q. Okay. And she was more likely to know about the
16 stamps that were on some of the forms; is that right?

17 A. I think anything related with the tax stuff we
18 thought she probably would have a little more experience than
19 someone who did not work for the IRS.

20 Q. Okay. So this interview took place on December 10
21 of 2020; correct?

22 A. Yes, that's correct.

23 Q. Okay. And Darrell Thomas was arrested on August 6
24 of 2020; is that right?

25 A. Yes.

1 Q. And he was indicted at that time, when he was
2 arrested?

3 A. I think the indictment is on August 4. And then
4 the arrest was on August 6.

5 Q. Okay. And there were news releases about it; is
6 that right?

7 A. Yes. I believe there was some sort of press
8 release.

9 Q. Okay. So there was a press release from the
10 Department of Justice; is that right?

11 A. I believe so.

12 Q. Okay. And there were resulting news articles about
13 it, like in the AJC and things like that?

14 A. I'm sure there were.

15 Q. Okay. Now, on direct, I think you testified about
16 the use of the rapid! PayCards in this scheme; is that
17 correct?

18 A. Yes.

19 Q. Okay. And so, specifically, you testified that
20 Darrell Thomas eventually began using rapid! PayCards to --
21 basically to launder the funds; is that right?

22 A. That's correct.

23 Q. So the funds would come into the business owners's
24 accounts; right?

25 A. Correct.

1 Q. And then Darrell Thomas told them or communicated
2 with them through a recruiter to send the money to his
3 accounts; is that right?

4 A. Are you referring specifically to rapid?

5 Q. Well, there were a couple of different options;
6 right?

7 A. I think, in the beginning, the payrolls were going
8 through Bellator and Elite Executive Services. Eventually,
9 down the road, when those two accounts were stopped and
10 seized, the money started going in through the MetaBank
11 rapid! PayCard program.

12 Q. Okay. And then the intention behind that was to
13 sort of make it look like there was actual legitimate payroll
14 happening; is that right?

15 A. Yes.

16 Q. Because that's one of the authorized purposes for
17 the PPP loans?

18 A. Yes.

19 Q. Okay.

20 MS. WEBSTER: Ms. Holland, can we see Government's
21 Exhibit 2954?

22 BY MS. WEBSTER:

23 Q. Agent Stites, we're looking at Government's
24 Exhibit 2954.

25 Is this the -- are these the records that you got

1 from MetaBank or the rapid! PayCards?

2 A. Yes. This looks like the records that we got from
3 rapid.

4 Q. Okay. And so on this first column here, it says
5 card info; is that right?

6 A. The first tab?

7 Q. The first tab. I'm sorry.

8 A. The first tab says card info.

9 Q. Okay. Is this a list of all the people that were
10 issued rapid! PayCards from the Bellator Phront Group
11 company?

12 A. Yes.

13 MS. WEBSTER: Ms. Holland, could we scroll down to
14 the bottom?

15 BY MS. WEBSTER:

16 Q. There are approximately 199 names, or at least
17 entries, on this list?

18 A. I think the first row is a header, so it would be
19 198.

20 Q. Okay. So 198 entries; is that right?

21 A. That looks about right.

22 Q. So do each of these rows represent a separate card
23 that was issued from Bellator Phront Group?

24 A. Yes.

25 Q. Okay. And so if we go to, I believe, Row 52.

1 So 51, actually, is the -- is what you referenced
2 on direct; right? It's the card issued in Mr. Foster's name?

3 A. Yes. That's the card we referenced in direct.

4 Q. Okay. And then on Row 52, whose name is listed
5 there?

6 A. Gena Foster.

7 Q. Okay. So just to be clear, not all the people on
8 this list actually received rapid! PayCards; is that right?

9 A. That's our understanding, yes.

10 Q. Okay. And instead, a lot of these cards that were
11 issued remained in the hands of people like Darrell Thomas
12 and Ricky Dixon and other participants in the conspiracy; is
13 that right?

14 A. We believe that that's true.

15 Q. Okay. And that's what you learned during the
16 course of your investigation; correct?

17 A. Yes.

18 Q. Okay. And in fact, when Darrell Thomas was
19 arrested on August 6, he had multiple rapid! PayCards in his
20 possession; is that right?

21 A. He did.

22 Q. I think it was nine. Does that sound right?

23 A. That's probably close to right, if not exactly
24 right.

25 Q. Okay. So they were using these cards to buy things

1 with; is that right?

2 A. Yeah. Using to buy, taking money out of the -- off
3 the card through ATM withdrawals. And I think eventually
4 they figured out a way to ACH the money into other bank
5 accounts.

6 Q. Okay. So they figured out multiple ways of getting
7 the monies off of these cards; is that correct?

8 A. Yes.

9 Q. Okay. And some people -- he had people withdrawing
10 thousands of dollars -- thousands of dollars of cash per day
11 at times; right?

12 A. Yes. I believe so.

13 Q. Okay. And he actually employed other people to
14 get -- to do that; right? He had other people take the cards
15 and swipe them?

16 A. Yes. That's our understanding.

17 Q. Okay. Okay.

18 MS. WEBSTER: We're done with this exhibit. Thank
19 you, Ms. Holland.

20 BY MS. WEBSTER:

21 Q. Agent Stites, I believe you got a search warrant
22 for cell site data; is that right?

23 A. Yes, we did.

24 Q. And that's what Agent Berni testified to last week;
25 is that correct?

1 A. Yes.

2 Q. But that data only started on July 1 of 2020; is
3 that correct?

4 A. I believe so. If you have the actual records, I
5 can confirm that for you, but I believe that's accurate.

6 Q. Okay. And so let's -- you did not request any
7 other cell site analysis other than what you asked Agent
8 Berni to do; is that correct?

9 A. Correct.

10 Q. Okay. And in this case, sometimes you got bank
11 surveillance footage; is that right?

12 A. Where we could get it. Bank surveillance footage
13 does not stay around long at the banks. So sometimes, by the
14 time you request it, it's not available.

15 Q. And did you try to get any ATM footage for the
16 rapid! Pay transactions that were associated with
17 Mr. Foster's name?

18 A. I think we were trying to find footage for all the
19 cards, to be honest with you.

20 Q. Okay. And were you able to get footage for any of
21 them?

22 A. I don't think we were able to get any footage. It
23 had been too long.

24 Q. So you weren't able to get footage not just for
25 Mr. Foster, but for any rapid! PayCard; correct?

1 A. Correct.

2 Q. You didn't get any documents associated with these
3 transactions; is that correct? Like receipts or things like
4 that?

5 A. What kind of receipts? Like store receipts?

6 Q. Yes.

7 A. No.

8 Q. Okay. You had issued a grand jury subpoena to
9 Bellator Phront Group; is that right?

10 A. Yes.

11 Q. And that was in the summer of 2020?

12 A. That sounds right.

13 Q. Okay. And so Mr. Thomas was supposed to provide
14 responses to that subpoena; is that correct?

15 A. He was.

16 Q. And did he provide responses to that subpoena?

17 A. Limited.

18 Q. And were those responses truthful?

19 A. I think there were some untruthful documents that
20 were provided.

21 Q. And do you know who created some of those
22 documents?

23 A. Who created them for the response?

24 Q. Yes, sir.

25 A. I'm not sure who actually put the documents

1 together for the response.

2 THE COURT: Ms. Webster -- sorry, go ahead. Go
3 ahead.

4 THE WITNESS: I don't know who put the documents
5 together for the response, whether it was Mr. Thomas or his
6 attorney or ...

7 THE COURT: Ms. Webster, hold on for one second,
8 please.

9 We're off the record.

10 (Discussion off the record, and proceedings
11 continued as follows:)

12 THE COURT: Sorry for the interruption,
13 Ms. Webster. You can go ahead.

14 MS. WEBSTER: Thank you, Your Honor.

15 BY MS. WEBSTER:

16 Q. Agent Stites, are you aware that Gena Pyfrom-Foster
17 was assisting Darrell Thomas in preparing the fraudulent
18 documents to submit to the grand jury?

19 A. No.

20 Q. You are not aware that she participated in that
21 activity at all?

22 A. I don't recall that.

23 Q. Okay. At some point Darrell Thomas agreed to come
24 in for a proffer session with you; is that correct?

25 A. Yes, he did.

1 Q. Okay. And so he came in for an interview in which
2 he agreed to be truthful; is that right?

3 A. Yes.

4 Q. That's one of the sort of primary concerns that you
5 have when someone comes in for a proffer statement; you want
6 them to be truthful?

7 A. Yes.

8 Q. Okay. And so he agreed to be truthful and provide
9 you with accurate and complete information?

10 A. Correct.

11 Q. Okay. But he didn't do that, did he?

12 MS. CHAIKEN: Your Honor, may we approach, please?

13 THE COURT: We're off the record.

14 (Off-the-record discussion, and proceedings
15 continued:)

16 THE COURT: Back on the record.

17 (Sidebar discussion on the record as follows:)

18 MS. CHAIKEN: Your Honor, Ms. Webster has just
19 asked about Darrell Thomas being untruthful in a proffer, in
20 a proffer interview, that's 608, 404(b).

21 There is no purpose other than to impeach the
22 credibility of somebody who is not testifying and to show
23 that he's a liar. There's no proper purpose for it.

24 MS. WEBSTER: Specifically, I anticipate that the
25 agent would testify that during the interview that Darrell

1 Thomas repeatedly denied, over and over and over again, that
2 Gena Pyfrom-Foster was involved in any way, and that was
3 consistent with the agreement that she had with Darrell
4 Thomas not -- for her not to be identified.

5 And I think that is highly relevant to our defense,
6 and admissible and is not offered for impeachment.

7 MS. CHAIKEN: Your Honor, there is no purpose for
8 it. It's hearsay.

9 THE COURT: I want to put this on the record and
10 look at the transcript. So this isn't going to work.

11 (End of sidebar discussion, and proceedings
12 continued:)

13 THE COURT: Ladies and gentlemen of the jury,
14 please step out of the courtroom.

15 (Jury withdrew from the courtroom at 10:53 a.m.)

16 THE COURT: We're off the record.

17 (Off-the-record discussion, and proceedings
18 continued:)

19 THE COURT: All right. Let's just start over with
20 the objection and state the grounds.

21 The witness was going over Darrell Thomas's proffer
22 session, and there were some questions about whether or not
23 he had been truthful in that proffer session.

24 And just for clarification, Darrell Thomas is not a
25 witness in this case and no one is anticipating calling

1 Mr. Thomas; is that correct, counsel?

2 MS. CHAIKEN: We're not, Your Honor.

3 THE COURT: Is the defense calling Mr. Thomas?

4 MS. WEBSTER: We're not, Your Honor.

5 MR. MARSHALL: No, Your Honor.

6 THE COURT: Okay. So nonwitness. Let's start from
7 there.

8 Go ahead, Ms. Chaiken.

9 MS. CHAIKEN: Your Honor, we have not relied on
10 Darrell Thomas in our case in any way. We have not relied on
11 his credibility in any way. He has not testified. He has
12 not identified Teldrin Foster as someone who participated in
13 the crime with him.

14 The evidence that he was untruthful in a proffer
15 session is hearsay that is -- or it's not hearsay; it's
16 impeachment that he lied, and it's impeachment that's
17 completely irrelevant to the case because he's not a witness.

18 And to the extent that defense wants to say that
19 it's for purposes of showing that he protected Gena
20 Pyfrom-Foster, again, we haven't relied on him as saying what
21 Ms. Pyfrom-Foster did or what Mr. Foster did.

22 But I think getting into this would open the door
23 to Mr. Thomas's later statements where he explained why he
24 protected her. Because he did, in a later proffer, admit
25 that she was involved in the conspiracy with him and that the

1 reason why he protected her was because he felt bad for her
2 because Teldrin Foster had gotten her involved and had been
3 abusive towards her and he had seen Teldrin Foster hit her,
4 and he felt bad that -- for her and didn't want to get her in
5 trouble.

6 I also think it would open up the door to all of
7 Darrell Thomas's truthful statements in his proffer, that
8 Teldrin Foster was involved and that all of the other people
9 who he talked about in the proffer were involved.

10 I don't think the defense can slice and dice his
11 proffer to put before the jury that he was untruthful about
12 one thing that they think helps their defense and then
13 prevent the jury from learning everything else Darrell Thomas
14 said in his proffer. That's the whole point.

15 He's not a witness. He is not here. We have not
16 relied on him. His credibility is not at issue. It's just
17 not relevant to the jury that he was untruthful about one
18 thing.

19 THE COURT: Ms. Webster.

20 MS. WEBSTER: Your Honor, I have a couple of
21 responses to that.

22 I mean, first is, you have a witness who had
23 promised to be truthful and he comes in and he denies the --
24 the portion that I'm trying to get out is that he
25 specifically lied about --

1 I'm sorry. Can the agent be excused for this part
2 of this?

3 THE COURT: Sure. Agent Stites, if you would
4 please step out of the courtroom.

5 Thank you.

6 (Pause.)

7 MS. WEBSTER: During the interview, Darrell Thomas
8 went to great lengths to protect Gena Pyfrom-Foster and said
9 that she was not involved. Those are consistent with the
10 WhatsApp messages where he is saying --

11 THE COURT: Again, if you can slow down for all of
12 us, Ms. Webster.

13 MS. WEBSTER: Yes.

14 Those are consistent with his WhatsApp messages
15 with Ms. Pyfrom-Foster where he says: Don't ever use your
16 own email address, that you don't exist, basically that we
17 don't know each other, even when he knew he was under federal
18 investigation.

19 So he comes in and he tells the government this.
20 And then they go back for a second interview later, and he
21 still doesn't tell them about Gena's involvement until the
22 government confronts him with it and says "We actually have
23 all your WhatsApp messages."

24 So to -- this is entirely relevant to the defense
25 that we're presenting, which is that Gena Pyfrom-Foster was

1 heavily involved and her involvement --

2 THE COURT: I don't think Ms. Chaiken's argument is
3 relevance. Is it, Ms. Chaiken?

4 MS. CHAIKEN: No. It's improper impeachment.

5 THE COURT: So you don't need to talk to us about
6 relevance, Ms. Webster.

7 We all understand how it could be relevant. But I
8 don't know that that addresses Ms. Chaiken's objection.

9 MS. WEBSTER: Well, it's not hearsay because it's
10 not offered for the truth of the matter; right? His
11 statement saying Gena is not involved, that's not a truth.
12 So it's not offered for the truth of the matter.

13 I don't think that -- we're not trying to just
14 impeach a nontestifying witness, it's not just to cast doubt
15 on his credibility so I don't think 608 is relevant. So I
16 think that it's an admissible line of questioning.

17 And to the idea that it opens the door to all of
18 his statements coming in, first of all, the government would
19 be introducing those for the truth of the matter. Right?

20 So it would be impermissible hearsay and a
21 confrontation clause objection or a confrontation clause
22 issue.

23 And --

24 THE COURT: So you basically want just bits and
25 pieces of his interview to come in but not allow the

1 government to put in bits and pieces? Is that it? That
2 seems questionable, Ms. Webster.

3 MS. WEBSTER: We're not playing the interview or
4 I'm not intending to elicit any direct statements, just sort
5 of the general nature of the fact that he denied Gena's
6 involvement.

7 THE COURT: Maybe I'll let it in and we'll see what
8 the government wants in as well.

9 I'm just having trouble with, if you want this in,
10 or that argument, why the government wouldn't come back
11 and -- I mean, we may need to let the jury know we're not
12 going to be wrapping up.

13 Maybe this opens the door pretty wide to some other
14 things. I don't know.

15 MS. WEBSTER: Your Honor, if they want to bring
16 Darrell Thomas in, we're happy to cross-examine him.

17 But the fact that we're asking about a nontruthful
18 statement that he made in a proffer doesn't open the door to
19 everything that he has ever said because that obviously
20 invites hearsay and confrontation clause issues. And we have
21 the right to cross-examine him.

22 THE COURT: He's not a witness. You certainly have
23 the right to cross-examine him if the government brought him
24 in, but he's not here. The government has not called him.
25 You could call him too, if you wanted to.

1 MS. WEBSTER: I'm not sure -- well, the logistics
2 of that, I think, are pretty difficult.

3 But I think it's also relevant to show the impact
4 on the investigation.

5 But if what the government is suggesting is that
6 they are able to bring in any statement that he has made
7 because I elicit that he concealed Gena's involvement, that
8 they can bring in any statement that he made, including for
9 the truth of the matter, then that does give rise to a major
10 confrontation clause issue, and also for the --

11 THE COURT: But aren't you offering it for the
12 truth of the matter as well?

13 You keep making this, oh, it's not being offered
14 for the truth, but it seems like it is.

15 MS. WEBSTER: His statement isn't true, Your Honor.
16 When he says Gena was not involved, she didn't know
17 anything, she was not involved. That is not true.

18 THE COURT: Ms. Chaiken.

19 MS. CHAIKEN: Your Honor, I agree it's not a
20 hearsay issue as far as that statement goes because they are
21 offering it to prove that it was false.

22 The issue is that they are trying to cross-examine
23 somebody who has not testified.

24 And if Darrell Thomas were here as a witness and
25 they asked him about his prior attempts to cover up Gena

1 Pyfrom-Foster's involvement, we would certainly be entitled
2 to get up and say "Why did you lie? Why did you cover it
3 up?" and to get into his reasons for that.

4 They're trying to use the fact that he's not here
5 to get in only the fact that he lied, without getting into
6 his later explanation for why he lied.

7 And they are also --

8 THE COURT: I think -- I mean, that's the point. I
9 think this is a rule of completeness issue.

10 Ms. Chaiken, if I understand your objection, you
11 are objecting because you are almost putting them on notice,
12 hey, if you are asking that, we're going to get up and ask
13 this.

14 Is that correct?

15 MS. CHAIKEN: That, too. But we also still don't
16 have an understanding of what the purpose is of admitting
17 that testimony other than to call Darrell Thomas a liar and
18 to essentially impeach his credibility, which is not
19 permissible under Rule 608 or under Rule 404(b).

20 He protected other people in the interview, too.
21 He also lied to us about his wife, Meghan Thomas, not being
22 involved and about Jesika Blakely, who is another person he
23 had a personal relationship with at the time, not being
24 involved. But he did not falsely inculcate anyone.

25 And again, I think this gets us back into the

1 guilty plea issue because I think the suggestion that Darrell
2 Thomas -- using the fact that he protected Gena Pyfrom-Foster
3 to say that he falsely inculpated Teldrin Foster I think is a
4 leap that they are trying to draw from this.

5 And again, I think it would open the door to us
6 asking our agent, "Did he tell you in that interview that
7 certain people weren't involved that he wanted to protect?"
8 The answer to that would be "yes."

9 And then the next question would be, "Did he tell
10 you if anyone was involved who did not end up being involved
11 or who your evidence did not show was involved?"

12 And the answer to that, I think, would be "no."

13 The fact that someone tries to falsely exculpate
14 people is not in any way connected to falsely inculpating
15 people.

16 THE COURT: Let me ask, Ms. Webster, so I guess
17 your primary argument is improper impeachment?

18 MS. CHAIKEN: Yes. And 404(b).

19 THE COURT: All right.

20 So what's your response to improper impeachment,
21 Ms. Webster?

22 MS. WEBSTER: It's not about his credibility. It's
23 not offered to impeach him or to show that he is not a
24 credible person.

25 The purpose would only be to show that he was

1 protecting Gena Pyfrom-Foster. So when the government says
2 that they haven't heard a proper purpose, that is the
3 purpose.

4 THE COURT: Ms. Chaiken.

5 MS. CHAIKEN: We haven't relied on Darrell Thomas.
6 If we had relied on Darrell Thomas, then it would be
7 important for the jury to know that he may have protected
8 Ms. Pyfrom-Foster. But we have not put Darrell Thomas on the
9 stand to say Teldrin Foster did this, Gena Foster did that.

10 And the defense knows very well from the recent
11 302s that we have produced that Darrell Thomas eventually did
12 explain exactly what Teldrin Foster did and what Gena
13 Pyfrom-Foster did, and he explained to us why he protected
14 Gena Pyfrom-Foster. They can't keep that from the jury.

15 THE COURT: Ms. Webster.

16 MS. CHAIKEN: And I would just note, Your Honor,
17 from the defense's own response in opposition to our motion
18 about the guilty pleas, they said Mr. Foster will argue that
19 Darrell Thomas is someone who used deceit.

20 That's exactly what they are now saying they are
21 not trying to do, but they continue trying to elicit evidence
22 that Darrell Thomas is a liar.

23 We all know he's a liar. He's been convicted of
24 fraud. But Darrell Thomas's credibility is not at issue for
25 this jury in this trial.

1 THE COURT: Ms. Webster?

2 MS. WEBSTER: Your Honor, our defense is that --

3 THE COURT: Can you move the mic a little closer to
4 you, please.

5 MS. WEBSTER: Our defense is that Gena
6 Pyfrom-Foster and Darrell Thomas were working together. This
7 is relevant to our defense. I think it's admissible. I
8 don't think that it opens the door to statements or to issues
9 that would deprive us to our right to confront the witness
10 and to -- and information that was then being offered for the
11 truth of the matter.

12 I would note that I have -- like, the questions
13 about that are very limited. It would be that he concealed
14 Gena's involvement. They went back for a second interview.
15 He said he was going to be truthful. He also started that
16 interview concealing Gena's involvement and that he finally
17 acknowledged her involvement after the government confronted
18 him with the WhatsApp messages. And that's the extent of it.

19 THE COURT: Well, going back to the question that
20 was objected to, it was simply about whether or not he was
21 truthful.

22 It was: "At some point Darrell Thomas agreed to
23 come in for a proffer session with you; is that correct?

24 "Yes, he did."

25 And a few questions later: "So he agreed to be

1 truthful and provide accurate and complete information?"

2 "Correct" is the answer.

3 Question: "But he didn't do that, did he?"

4 So you are simply -- the only thing I'm ruling on
5 right now is the objection to that question. And that seems
6 to clearly go to whether or not he was truthful.

7 How is it -- how is the objection to that question
8 any more than that, Ms. Webster?

9 MS. WEBSTER: Well, Your Honor, because the next
10 question was going to be --

11 THE COURT: I'm not ruling on the next question;
12 I'm ruling on this question.

13 MS. WEBSTER: Well, I can withdraw that question.

14 But then the next question is: He lied to you
15 about Gena Pyfrom-Foster's involvement.

16 THE COURT: All right. Anything else, Ms. Chaiken?
17 Your motion -- or your objection?

18 MS. CHAIKEN: No, Your Honor.

19 THE COURT: All right. I'm going to need to take a
20 break and look at this in a little bit more detail.

21 We're off the record.

22

23 (Off the record at 11:12 a.m.)

24 (Lunch recess was taken.)

25

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

CERTIFIED STENOGRAPHIC REPORTER'S CERTIFICATE

I, Judith M. Wolff, a stenographic reporter,
Certified Realtime Reporter and Official Court Reporter for
the United States District Court for the Northern District of
Georgia, with offices at Atlanta, do hereby certify:

That I reported on the Stenograph machine the
proceedings held in open court on Monday, February 12, 2024,
in the matter of United States of America v. Carla Jackson
and Teldrin Foster, Case No. 1:20-cr-00296-JPB-5-20;

That said proceedings in connection with the
hearing were reduced to typewritten form by me;

And that the foregoing transcript is a true and
accurate record of the proceedings.

This the 12th day of February, 2024.

/s/ Judith M. Wolff, RPR, CRR
Official Court Reporter

BY MS. WEBSTER: [13] 14/18 19/24 21/22 23/16 28/8 28/14 28/25 29/22 31/22 38/22 39/15 41/20 44/15 COURT SECURITY OFFICER: [1] 28/1 COURTROOM DEPUTY: [1] 28/4 MR. MARSHALL: [3] 2/8 12/5 47/5 MS. CHAIKEN: [19] 3/4 5/24 6/3 16/18 17/2 18/2 30/21 45/12 45/18 46/7 47/2 47/9 50/4 52/19 53/15 54/18 55/5 55/16 57/18 MS. WEBSTER: [40] 8/14 9/5 9/7 9/9 10/8 10/21 13/18 13/23 14/16 16/19 16/25 17/24 21/11 21/16 21/18 21/21 23/4 23/15 27/21 30/10 31/15 38/20 39/13 41/18 44/14 45/24 47/4 48/20 49/7 49/13 50/9 51/3 51/15 52/1 52/15 54/22 56/2 56/5 57/9 57/13 THE COURT: [65] THE WITNESS: [3] 21/17 21/19 44/4	7 75 [1] 1/23 9 90 [2] 1/7 33/25 940 [2] 35/15 35/19 941 [1] 35/15 944 [1] 35/18 9:45 [1] 2/2 A a.m [6] 2/2 14/8 17/8 23/11 46/15 57/23 able [9] 2/22 12/25 23/17 28/15 30/5 42/20 42/22 42/24 52/6 about [44] 3/6 6/9 6/10 8/20 9/21 10/10 10/15 11/1 11/12 15/20 15/21 16/11 19/19 20/1 22/13 23/2 23/4 25/5 25/11 27/17 33/6 33/6 36/15 37/5 37/12 37/15 39/21 45/19 46/22 48/9 48/11 48/17 48/25 49/21 50/5 51/17 52/25 53/21 53/22 54/22 55/18 56/13 56/20 57/15 aboveboard [1] 3/18 abusive [1] 48/3 account [2] 4/11 4/11 accounts [4] 37/24 38/3 38/9 41/5 accurate [5] 24/16 42/5 45/9 57/1 58/18 ACH [1] 41/4 acknowledged [1] 56/17 actions [2] 22/9 24/19 activity [1] 44/21 actual [5] 19/12 31/10 31/17 38/13 42/4 actually [7] 22/23 34/24 40/1 40/8 41/13 43/25 49/22 add [2] 12/5 35/24 additional [1] 23/7 address [3] 5/3 12/20 49/16 addressed [1] 12/7 addresses [5] 3/11 9/10 12/8 21/11 50/8 addressing [1] 5/18 admissible [5] 3/24 11/6 46/6 50/16 56/7 admission [1] 5/3 admit [10] 2/20 7/18 7/19 13/16 30/12 30/16 30/25 31/11 31/16 47/24 admitted [6] 7/21 7/24 30/19 30/25 31/18 31/20 admitting [2] 31/12 53/16 adopt [2] 12/6 12/11 Advertising [1] 15/22 advised [2] 26/24 27/2 affect [2] 17/19 19/2 after [6] 1/11 6/16 17/13 19/6 22/9 56/17 again [8] 3/1 3/2 3/24 46/1 47/20 49/11 53/25 54/5 agencies [1] 15/7 agent [40] 10/10 14/15 14/19 18/25 19/25 21/8 22/6 23/17 28/15 29/1 29/12 29/21 30/14 31/23 32/5 32/8 32/12 32/15 32/17 32/21 33/2 33/22 33/25 34/3 34/5 34/9 35/5 35/7 35/14 35/17 35/23 38/23 41/21 41/24 42/7 44/16 45/25 49/1 49/3 54/6 Agent Stites [1] 18/25 agents [2] 15/4 26/20 ago [1] 34/8 agree [4] 13/15 20/24 31/24 52/19 agreed [8] 26/1 26/2 26/6 44/23 45/2 45/8 56/22 56/25 agreement [5] 2/23 8/5 8/10 13/9 46/3 agreements [1] 12/18 agrees [1] 18/2 ahead [6] 19/22 23/14 44/2 44/3 44/13 47/8 AI [1] 1/18 ain't [1] 29/20 AJC [1] 37/13 all [47] 2/4 2/7 2/9 2/12 2/15 2/22 3/18 4/13 6/22 7/1 7/6 8/12 8/23 10/4 10/8 11/5 13/13 14/2 14/9 17/9	17/10 19/13 23/2 23/12 23/12 29/18 30/7 30/19 30/25 32/10 32/11 39/9 40/7 42/18 44/21 46/19 48/6 48/8 49/11 49/23 50/7 50/17 50/18 54/19 55/23 57/16 57/19 alleged [1] 12/14 allow [1] 50/25 allowed [1] 5/5 almost [1] 53/11 already [3] 11/19 22/12 24/21 also [10] 13/2 15/10 24/22 48/6 52/3 52/10 53/7 53/15 53/21 56/15 altogether [1] 32/25 always [1] 9/14 AM [1] 1/5 Amanda [4] 15/15 18/3 18/17 19/7 AMERICA [2] 1/4 58/11 amount [2] 32/19 36/10 analysis [1] 42/7 Ann [1] 1/19 another [5] 3/13 17/2 27/2 35/5 53/22 answer [5] 12/25 19/9 54/8 54/12 57/2 anticipate [2] 30/11 45/24 anticipated [1] 13/3 anticipating [2] 13/18 46/25 any [31] 1/13 6/21 7/18 7/18 7/25 10/2 10/5 11/1 11/21 12/20 17/23 18/19 18/19 24/19 30/17 31/9 35/9 42/6 42/15 42/20 42/22 42/25 43/2 46/2 47/10 47/11 51/4 52/6 52/8 54/14 57/8 anybody's [1] 30/5 anyone [2] 53/24 54/10 anything [10] 12/19 18/12 18/18 18/25 19/7 19/10 36/2 36/17 52/17 57/16 appear [1] 9/21 appearance [2] 33/16 33/16 Appearances [1] 1/15 appreciate [1] 2/13 appreciated [1] 14/13 approach [3] 10/24 17/4 45/12 approximately [1] 39/16 April [1] 14/22 are [50] 1/12 2/15 2/25 3/21 7/12 7/17 7/19 9/21 11/4 11/10 11/12 11/15 11/20 11/24 12/24 13/18 18/3 19/18 19/21 24/4 30/7 30/9 30/23 31/3 31/10 31/17 32/1 33/7 33/8 33/8 38/4 38/25 39/16 44/16 44/20 49/9 49/14 52/2 52/6 52/20 52/22 53/7 53/11 53/11 53/12 54/4 55/20 55/20 56/13 57/4 aren't [4] 5/2 5/4 5/9 52/11 argue [1] 55/18 argued [1] 12/3 argument [5] 8/16 12/21 50/2 51/10 54/17 arguments [3] 3/2 12/6 13/12 around [1] 42/13 arrest [1] 37/4 arrested [3] 36/23 37/2 40/19 article [2] 19/1 19/4 articles [1] 37/12 ask [6] 19/6 21/13 23/8 25/21 53/12 54/16 asked [13] 6/23 8/20 9/18 9/18 10/11 10/13 25/20 35/17 35/24 35/25 42/7 45/19 52/25 asking [5] 13/21 21/14 51/17 53/12 54/6 asserted [1] 5/1 assisting [1] 44/17 associated [3] 15/21 42/16 43/2 ATLANTA [3] 1/2 1/24 58/7 ATM [2] 41/3 42/15 attached [1] 1/9 attaching [1] 1/12 attempts [1] 52/25 attorney [4] 26/17 26/18 26/20 44/6 Attorney's [1] 26/19 audio [7] 27/25 28/13 28/24 29/25 31/2 31/10 31/17 August [11] 15/17 19/25 20/4 20/18 20/21 22/4 23/18 36/23 37/3 37/4
\$ \$1,000 [1] 29/17 \$2,000 [1] 29/17 \$60,000 [1] 27/14 \$90,000 [2] 33/24 34/21		
' 'cause [2] 33/4 33/20		
/ /s [1] 58/23		
1 10 [1] 36/20 10:00 [1] 2/14 10:06 [1] 14/8 10:10 [1] 17/8 10:20 [1] 23/11 10:53 [1] 46/15 11:12 [1] 57/23 12 [2] 1/12 58/10 12th [1] 58/20 1317 [1] 1/24 1914 [1] 1/23 198 [2] 39/19 39/20 199 [1] 39/16 1:20-CR-00296-JPB-5-20 [2] 1/5 58/12		
2 20 [2] 1/5 58/12 2016 [1] 33/20 2019 [1] 3/10 2020 [11] 14/22 15/17 20/1 20/6 20/12 23/18 23/23 36/21 36/24 42/2 43/11 2021 [2] 20/19 20/21 2024 [3] 1/12 58/10 58/20 215-1317 [1] 1/24 2954 [2] 38/21 38/24		
3 30 [3] 32/24 32/24 33/13 302s [1] 55/11 30303-3361 [1] 1/24 3361 [1] 1/24		
4 403 [1] 17/21 404 [8] 1/24 3/11 3/24 4/23 5/11 45/20 53/19 54/18 45 [1] 32/12 46 [1] 12/13		
5 50 [3] 27/14 32/13 33/1 51 [1] 40/1 52 [2] 39/25 40/4		
6 60 [2] 32/25 33/1 608 [3] 45/20 50/15 53/19		

A	14/5 14/9 14/14 14/19 17/9 19/6 19/14 19/17 19/18 20/20 21/21 23/12 23/14 25/7 29/4 29/13 29/14 29/14 30/4 30/14 30/15 30/16 31/6 31/25 32/23 33/19 38/20 42/5 44/13 48/10 49/1 49/11 52/8 56/3 57/13 can't [4] 30/1 30/2 36/9 55/14 cannot [1] 11/24 capable [1] 3/25 capacity [2] 3/23 4/19 card [6] 39/5 39/8 39/22 40/2 40/3 41/3 cards [5] 40/10 40/25 41/7 41/14 42/19 CARLA [2] 1/6 58/11 case [20] 3/9 3/11 3/14 4/5 4/22 4/24 7/12 8/7 10/11 11/23 12/1 14/24 15/9 20/9 26/20 42/10 46/25 47/10 47/17 58/12 cases [4] 5/2 5/4 5/9 5/17 cash [1] 41/10 cashing [2] 3/15 3/20 cast [1] 50/14 CDC [2] 22/20 24/12 cell [2] 41/22 42/7 certain [1] 54/7 certainly [2] 51/22 53/1 CERTIFICATE [1] 58/2 Certified [3] 1/19 58/2 58/5 certify [1] 58/7 Chaiken [13] 1/16 3/2 12/3 13/15 13/22 17/25 19/20 47/8 50/3 52/18 53/10 55/4 57/16 Chaiken's [2] 50/2 50/8 chain [1] 10/1 changed [1] 33/17 charged [13] 6/20 7/1 7/2 7/2 7/7 7/12 10/3 10/6 10/11 11/5 12/14 15/24 20/8 charging [1] 6/21 check [5] 2/11 3/15 3/20 12/16 28/4 Christian [8] 15/15 18/17 19/7 22/14 22/25 24/5 24/24 25/2 Christian's [1] 18/3 circle [1] 17/10 Circuit [3] 3/10 3/21 4/6 cite [1] 1/9 clarification [1] 46/24 clarified [1] 8/21 clause [6] 7/17 8/4 50/21 50/21 51/20 52/10 clear [9] 4/24 8/4 9/14 11/23 12/1 17/14 29/3 31/16 40/7 clearly [4] 6/4 7/10 7/11 57/6 clips [4] 25/6 27/11 27/13 31/17 close [1] 40/23 closer [1] 56/3 clubs [1] 33/5 CM [2] 1/5 1/6 CM/ECF [2] 1/5 1/6 codefendant [3] 5/6 7/19 13/19 codefendant's [2] 5/19 11/24 codefendants [8] 6/9 6/15 8/11 11/2 11/3 11/4 11/8 12/19 codefendants's [1] 2/20 collect [1] 15/1 column [1] 39/4 come [10] 6/19 14/5 26/1 26/2 26/6 37/23 44/23 50/25 51/10 56/23 comes [4] 5/13 45/5 48/23 49/19 coming [1] 50/18 commit [1] 4/21 communicate [3] 9/22 9/24 9/25 communicated [6] 8/22 10/12 10/13 10/14 11/8 38/1 communicating [5] 8/23 8/24 9/2 9/12 9/15 communication [2] 7/7 10/2 company [1] 39/11 complete [2] 45/9 57/1 completed [1] 2/16 completely [2] 7/3 47/17 completeness [3] 27/23 30/7 53/9 comprehensible [1] 31/24 concealed [2] 52/7 56/13 concealing [1] 56/16 concern [1] 9/11	concerned [1] 9/21 concerns [1] 45/4 conducted [1] 15/10 confirm [2] 23/17 42/5 confirming [1] 22/4 confront [1] 56/9 confrontation [7] 7/17 8/4 12/25 50/21 50/21 51/20 52/10 confronted [1] 56/17 confronts [1] 49/22 connected [1] 54/14 connection [1] 58/14 consider [2] 6/11 8/17 consistent [3] 46/3 49/9 49/14 conspiracy [5] 7/22 7/23 11/14 40/12 47/25 conspiring [1] 11/5 context [2] 5/3 5/13 continue [2] 14/14 55/21 continued [6] 5/22 14/17 44/11 45/15 46/12 46/18 contradicted [1] 7/16 conversation [1] 26/3 convicted [1] 55/23 convictions [2] 11/24 13/19 cooperating [1] 13/6 cooperator [1] 5/13 coordinate [1] 26/18 correct [31] 15/8 15/14 16/3 20/16 20/17 21/4 22/7 24/6 25/16 35/2 36/21 36/22 37/17 37/22 37/25 40/16 41/7 41/25 42/3 42/8 42/9 42/25 43/1 43/3 43/14 44/24 45/10 47/1 53/14 56/23 57/2 could [12] 6/22 8/6 10/25 17/4 18/24 23/9 26/11 33/4 39/13 42/12 50/7 51/25 counsel [2] 11/20 47/1 Count [1] 12/13 couple [3] 22/14 38/5 48/20 course [1] 40/16 court [19] 1/6 1/11 1/13 1/17 1/19 1/1 1/11 1/22 1/22 2/2 2/17 3/9 9/6 14/1 18/21 58/5 58/6 58/10 58/24 courthouse [2] 1/23 31/2 courtroom [6] 14/8 17/8 23/11 46/14 46/15 49/4 cover [2] 52/25 53/2 cr [2] 1/5 58/12 crazy [1] 33/15 created [2] 43/21 43/23 credibility [7] 45/22 47/11 48/16 50/15 53/18 54/22 55/24 credible [1] 54/24 credit [1] 29/16 crime [1] 47/13 cross [9] 13/1 13/20 14/15 14/17 25/11 51/16 51/21 51/23 52/22 cross-examination [3] 13/20 14/15 14/17 cross-examine [4] 51/16 51/21 51/23 52/22 CRR [2] 1/22 58/23
B	D	
Babasijibomi [1] 1/17 back [17] 3/5 5/23 6/2 11/17 14/12 17/10 31/12 32/9 32/18 32/21 36/1 45/16 49/20 51/10 53/25 56/14 56/19 bad [2] 48/1 48/4 bank [4] 12/16 41/4 42/10 42/12 banks [1] 42/13 Baptiste [2] 3/10 4/24 barber [1] 29/9 based [7] 4/7 4/8 4/22 8/17 18/11 18/18 22/10 basically [5] 3/12 3/21 37/21 49/16 50/24 be [50] 1/5 1/6 2/14 3/24 9/21 11/18 12/25 13/3 14/9 17/9 17/17 17/20 18/11 18/15 20/14 23/12 24/12 25/7 26/25 28/12 28/21 29/24 30/5 30/8 30/17 31/14 36/12 39/18 40/7 42/19 45/2 45/6 45/8 46/4 48/23 49/1 50/7 50/19 50/20 51/12 53/1 54/8 54/9 54/12 54/25 55/6 56/13 56/15 56/25 57/10 because [27] 3/5 4/9 4/25 5/4 5/10 8/5 9/11 11/11 16/7 18/24 22/20 29/19 30/9 31/23 33/11 38/16 47/17 47/24 48/1 48/2 50/9 51/19 52/7 52/20 53/11 54/1 57/9 been [21] 3/6 4/25 5/4 6/22 7/10 7/11 7/12 9/13 10/3 10/6 11/19 25/4 27/23 30/13 30/17 36/7 36/10 42/23 46/23 48/2 55/23 before [11] 1/11 2/10 3/23 15/19 17/18 19/11 20/8 20/11 21/1 25/15 48/11 began [2] 14/19 37/20 beginning [1] 38/7 behind [1] 38/12 being [10] 14/12 14/12 24/6 30/11 45/19 52/13 53/21 53/23 54/10 56/10 belief [1] 13/8 believe [13] 11/19 22/19 23/24 24/17 35/14 37/7 37/11 39/25 40/14 41/12 41/21 42/4 42/5 believed [1] 36/11 Bellator [4] 38/8 39/10 39/23 43/9 benefits [1] 6/7 Berni [2] 41/24 42/8 between [3] 20/4 32/24 33/1 big [1] 34/24 bit [5] 9/3 25/14 26/21 27/17 57/20 bits [2] 50/24 51/1 Blakely [1] 53/22 both [1] 9/6 bottom [1] 39/14 BOULEE [1] 1/11 branch [1] 12/16 break [1] 57/20 Brenda [8] 4/18 6/11 8/5 8/6 8/7 8/8 8/10 10/22 bring [10] 2/11 2/14 14/4 23/6 23/9 26/19 35/15 51/15 52/6 52/8 bringing [1] 12/18 brought [2] 7/5 51/23 build [2] 29/14 29/14 bullshitted [1] 33/6 bunch [1] 17/18 business [13] 3/16 3/19 3/22 3/25 4/3 5/6 8/23 9/2 9/12 28/21 29/20 34/8 37/23 buy [2] 40/25 41/2	Darrell [54] 4/10 4/18 6/5 6/5 6/6 6/15 6/16 7/7 7/8 7/13 7/13 8/21 9/1 9/12 9/22 9/24 10/13 13/3 13/7 13/9 27/15 28/20 34/7 34/17 34/23 36/23 37/20 38/1 40/11 40/18 44/17 44/23 45/19 45/25 46/3 46/21 46/24 47/10 48/7 48/13 49/7 51/16 52/24 53/17 54/1 55/5 55/6 55/8 55/11 55/19 55/22 55/24 56/6 56/22 data [2] 41/22 42/2 date [1] 20/22 dates [1] 22/4 David [4] 1/18 32/14 32/16 34/17 day [4] 21/19 25/15 41/10 58/20 days [2] 1/7 25/4 deal [1] 7/13 debated [1] 17/13 deceit [1] 55/19 deceived [4] 4/5 5/7 5/8 8/1 deceiving [1] 4/4 December [3] 20/5 20/12 36/20	
C		
call [6] 12/23 13/8 25/23 25/24 51/25 53/17 called [6] 2/2 18/13 18/18 24/10 24/12 51/24 calling [3] 13/3 46/25 47/3 came [5] 17/21 27/7 33/21 35/8 45/1 can [41] 2/4 8/10 9/3 9/5 13/1 13/23		

D	duties [1] 15/1	figured [3] 24/8 41/4 41/6
deception [2] 5/19 6/6	E	filed [4] 1/5 1/11 1/13 6/20
decisions [1] 6/21	each [3] 6/11 39/22 49/17	filing [1] 4/19
defendant [6] 1/18 1/19 3/15 4/5 5/4 5/18	earlier [1] 16/21	fill [1] 35/13
Defendant's [1] 31/20	early [2] 12/17 13/6	finally [1] 56/16
Defendants [1] 1/8	ECF [2] 1/5 1/6	Finance [2] 22/20 24/12
defense [26] 3/7 3/7 3/12 3/16 4/7 4/9 4/22 4/25 5/10 5/25 6/4 6/5 6/8 7/15 8/13 18/5 46/5 47/3 47/18 48/10 48/12 49/24 55/10 56/2 56/5 56/7	effect [7] 16/20 17/21 18/19 18/19 18/23 19/5 19/11	find [2] 5/17 42/18
defense's [1] 55/17	effects [2] 18/6 18/7	fine [1] 30/7
denied [2] 46/1 51/5	either [1] 30/2	first [12] 2/10 2/19 3/3 8/16 24/14 39/4 39/6 39/7 39/8 39/18 48/22 50/18
denies [1] 48/23	Eleventh [3] 3/10 3/21 4/6	five [1] 2/12
Department [1] 37/10	elicit [3] 51/4 52/7 55/21	following [1] 1/3
deposited [1] 12/16	elicited [2] 4/8 8/19	follows [2] 44/11 45/17
deprive [1] 56/9	eliminate [2] 7/25 11/21	footage [7] 42/11 42/12 42/15 42/18 42/20 42/22 42/24
description [1] 8/18	Elite [1] 38/8	foregoing [1] 58/17
despite [1] 7/7	else [7] 9/25 10/14 13/17 17/19 33/3 48/13 57/16	foremost [2] 2/10 2/19
detail [1] 57/20	email [2] 4/11 49/16	form [3] 35/13 35/15 58/15
detailed [1] 3/1	emails [1] 36/1	forms [2] 35/9 36/16
details [1] 17/23	employed [1] 41/13	forth [2] 12/6 12/24
develop [1] 16/24	employee [2] 36/5 36/7	forwarding [1] 36/1
dice [2] 6/8 48/10	end [4] 9/22 29/19 46/11 54/10	FOSTER [73]
did [60]	enters [2] 14/8 23/11	Foster's [7] 4/20 8/3 25/8 40/2 42/17 53/1 57/15
didn't [16] 5/16 5/17 17/10 17/19 18/17 24/14 26/11 26/13 29/19 31/16 33/18 43/2 45/11 48/4 52/16 57/3	entire [4] 4/20 4/22 8/16 18/25	found [1] 24/23
different [3] 30/18 30/24 38/5	entirely [4] 4/9 11/6 11/14 49/24	foundation [2] 16/20 23/7
difficult [3] 26/15 29/1 52/2	entitled [1] 53/1	four [1] 33/14
direct [11] 10/20 25/5 25/8 25/10 25/10 25/12 34/12 37/15 40/2 40/3 51/4	entries [2] 39/17 39/20	frame [3] 4/12 15/18 16/25
directly [2] 9/15 10/13	entry [1] 1/10	fraud [6] 4/12 4/21 7/25 12/15 34/13 55/24
discovery [5] 20/15 20/18 20/21 20/23 20/25	Esq [6] 1/16 1/16 1/17 1/18 1/19 1/19	fraudulent [2] 3/15 44/17
discussed [3] 16/23 25/8 34/11	essentially [1] 53/18	free [1] 5/15
discussing [1] 18/22	establish [1] 19/16	front [2] 10/17 18/25
discussion [8] 2/10 2/16 5/21 44/10 45/14 45/17 46/11 46/17	established [2] 19/14 29/16	fuck [3] 32/11 32/11 33/13
dispute [1] 11/21	establishes [1] 9/1	fucked [1] 33/23
District [6] 1/19 1/1 1/1 1/11 58/6 58/6	even [5] 22/20 29/19 29/20 35/15 49/17	fucking [2] 32/13 33/18
DIVISION [1] 1/2	eventually [5] 17/21 37/20 38/8 41/3 55/11	full [2] 1/12 22/12
Dixon [1] 40/12	ever [3] 4/10 49/15 51/19	funds [2] 37/21 37/23
do [42] 3/23 8/9 8/11 10/18 12/2 12/18 13/17 13/22 13/25 16/24 18/8 18/12 18/12 18/18 19/7 19/10 19/14 19/22 20/1 21/13 21/20 25/4 26/6 29/10 29/14 29/14 30/2 30/8 31/6 31/6 32/22 35/9 35/24 36/8 39/22 41/14 42/8 43/21 45/11 55/21 57/3 58/7	every [1] 13/19	G
docket [2] 1/10 1/4	everyone [2] 2/6 18/2	Gaines [1] 12/22
document [8] 1/13 15/19 16/5 20/2 20/4 20/13 21/23 29/4	everything [2] 48/13 51/19	gand.uscourts.gov [1] 1/25
documents [8] 4/14 6/7 43/2 43/19 43/22 43/25 44/4 44/18	evidence [20] 2/20 3/11 3/12 3/18 3/22 4/2 4/9 4/13 5/5 5/12 10/22 11/8 11/12 11/20 30/22 31/18 31/21 47/14 54/11 55/21	Gena [17] 25/16 40/6 44/16 46/2 47/19 49/8 49/25 50/11 52/16 52/25 54/2 55/1 55/9 55/12 55/14 56/5 57/15
Doe [3] 18/8 18/9 18/15	exact [4] 14/21 14/21 20/3 36/9	Gena's [5] 49/21 51/5 52/7 56/14 56/16
does [4] 35/19 40/22 42/13 52/9	exactly [5] 8/11 23/24 40/23 55/12 55/20	general [1] 51/5
doesn't [6] 6/11 7/21 12/19 19/4 49/21 51/18	examination [3] 13/20 14/15 14/17	generally [2] 5/12 26/18
doing [4] 13/22 30/17 33/4 36/2	examine [4] 51/16 51/21 51/23 52/22	gentlemen [3] 14/11 17/6 46/13
dollars [3] 33/15 41/10 41/10	exculpate [1] 54/13	GEORGIA [3] 1/1 1/24 58/7
don't [41] 2/24 7/15 10/8 12/2 13/16 17/22 20/3 20/13 20/22 22/2 22/19 22/19 22/24 22/25 23/24 24/17 26/3 26/5 28/16 29/2 29/20 30/2 30/4 30/9 30/16 30/23 42/22 44/4 44/22 48/10 49/15 49/16 49/17 50/2 50/5 50/8 50/13 50/15 51/14 53/15 56/8	excused [1] 49/1	get [24] 2/15 14/5 15/4 15/6 21/7 26/11 26/13 29/15 29/16 32/21 35/14 41/14 42/12 42/15 42/20 42/22 42/24 43/2 48/4 48/24 53/2 53/3 53/5 53/12
done [2] 3/23 41/18	Executive [1] 38/8	gets [1] 53/25
door [9] 3/8 5/14 47/22 48/6 50/17 51/13 51/18 54/5 56/8	exhibit [6] 21/17 21/18 31/20 38/21 38/24 41/18	getting [4] 17/18 41/6 47/22 53/5
doubt [1] 50/14	Exhibit 2954 [1] 38/24	give [4] 22/17 25/22 35/12 52/9
down [6] 9/3 26/6 27/7 38/9 39/13 49/11	exist [1] 49/16	given [1] 31/1
drafting [1] 12/13	experience [1] 36/18	giving [1] 29/17
draw [1] 54/4	explain [1] 55/12	go [16] 3/3 18/16 19/17 19/19 19/19 19/22 23/14 33/4 35/14 39/25 44/2 44/2 44/13 47/8 49/20 57/6
Drive [1] 1/23	explained [4] 18/21 19/21 47/23 55/13	goes [1] 52/20
dude [3] 29/18 32/14 32/16	explanation [1] 53/6	going [25] 10/20 11/3 11/17 19/19 23/5 28/9 30/5 30/7 30/8 30/23 31/11 31/12 35/12 35/14 36/14 38/7 38/10 46/10 46/21 51/12 53/12 56/15 56/19 57/10 57/19
duped [3] 3/16 3/19 8/1	extent [4] 13/11 31/9 47/18 56/18	going-in [1] 36/14
duping [2] 3/25 4/4	F	gonna [1] 33/13
during [6] 13/11 17/16 35/2 40/15 45/25 49/7	F40A [3] 27/23 30/12 31/20	Good [3] 2/6 2/8 14/11
Durrett [1] 1/19	F40C [1] 29/23	got [15] 2/12 3/6 5/15 16/2 20/23 24/18 24/25 29/20 29/20 32/8 32/17 38/25 39/2 41/21 42/10
	F40E [2] 27/23 31/20	gotten [1] 48/2
	fact [12] 2/21 6/20 7/19 12/15 22/16 40/18 51/5 51/17 53/4 53/5 54/2 54/13	government [20] 1/16 9/18 10/22 10/23 11/11 11/11 13/1 13/3 13/6 49/19 49/22 50/18 51/1 51/8 51/10 51/23 51/24 52/5 55/1 56/17
	fair [6] 11/14 28/19 31/14 35/8 35/10 36/11	government's [9] 2/19 9/10 11/4 11/18 12/7 12/10 12/12 38/20 38/23
	fairly [1] 31/4	grand [4] 32/13 33/13 43/8 44/18
	false [1] 52/21	great [1] 49/8
	falsely [4] 53/24 54/3 54/13 54/14	
	familiar [1] 36/12	
	far [2] 19/19 52/20	
	FEBRUARY [3] 1/12 58/10 58/20	
	federal [1] 49/17	
	feel [1] 10/23	
	fell [2] 29/16 33/11	
	felt [3] 24/11 48/1 48/4	
	few [4] 2/24 9/14 36/10 56/25	

G	Holland [3] 38/20 39/13 41/19 honest [3] 20/14 28/12 42/19 Honestly [1] 22/19 Honor [36] 3/4 5/9 5/24 6/4 8/14 14/1 14/16 16/18 16/19 17/2 17/24 18/2 21/11 23/15 27/21 28/1 30/10 30/12 30/21 31/15 44/14 45/12 45/18 46/7 47/2 47/4 47/5 47/9 48/20 51/15 52/15 52/19 55/16 56/2 57/9 57/18 HONORABLE [1] 1/11 hope [1] 2/6 hour [1] 17/14 hours [2] 27/9 27/10 how [15] 3/6 7/1 17/21 19/18 19/19 28/16 32/5 32/10 32/21 33/13 33/22 35/9 50/7 57/7 57/7 however [1] 1/12 hundred [3] 30/24 31/13 33/14 hustled [5] 28/18 28/22 34/10 34/15 34/20 hustling [1] 29/18 hypothetical [1] 13/14	investigating [1] 26/20 investigation [22] 12/10 12/12 14/20 15/2 15/10 16/8 16/20 17/1 17/16 17/19 18/6 18/7 18/19 18/24 19/2 19/6 19/8 19/10 19/11 40/16 49/18 52/4 Investigator [1] 14/5 invites [1] 51/20 involved [23] 3/14 7/4 9/16 10/3 10/7 24/6 26/21 46/2 47/25 48/2 48/8 48/9 49/9 50/1 50/11 52/16 52/17 53/22 53/24 54/7 54/10 54/10 54/11 involvement [10] 7/4 49/21 50/1 51/6 52/7 53/1 56/14 56/16 56/17 57/15 irrelevant [2] 7/3 47/17 IRS [5] 35/7 36/5 36/7 36/12 36/19 is [175] isn't [4] 8/4 10/19 46/10 52/15 issue [23] 5/3 5/18 7/17 8/4 12/8 12/25 14/2 16/21 16/23 17/2 17/11 17/22 18/22 21/12 31/2 48/16 50/4 50/22 52/10 52/20 52/22 53/9 54/1 55/24 issued [5] 39/10 39/23 40/2 40/11 43/8 issues [3] 2/16 51/20 56/8 it [128] it's [34] 3/2 3/10 4/8 4/17 5/13 14/12 18/22 21/18 22/20 25/4 26/15 28/1 29/2 31/4 40/2 42/14 46/8 47/15 47/15 47/16 47/19 48/16 50/4 50/9 50/9 50/12 50/14 50/16 52/3 52/13 52/19 54/22 54/22 56/7
H	I	J
had [50] 3/16 3/17 3/19 4/3 7/7 8/5 8/9 11/8 11/8 11/11 11/11 13/5 15/9 16/14 21/1 22/12 22/16 22/25 24/21 24/22 24/23 25/16 26/4 27/13 27/14 27/22 28/20 28/22 31/13 33/12 34/16 34/20 34/23 34/24 36/7 36/9 36/10 40/19 41/9 41/14 42/23 43/8 46/3 46/23 48/2 48/2 48/3 48/22 53/23 55/6 Hale [5] 34/3 35/7 35/14 35/17 35/24 hand [1] 21/25 handed [1] 21/19 hands [3] 21/23 29/4 40/11 happened [2] 19/25 24/21 happening [1] 38/14 happy [1] 51/16 hard [4] 28/11 28/16 29/2 31/5 harm [1] 11/21 has [33] 1/11 3/7 3/7 3/23 3/23 4/7 4/10 4/14 4/19 5/4 5/7 5/8 5/25 6/4 6/8 6/14 7/10 7/11 11/19 12/3 12/6 12/18 13/22 17/25 19/21 30/13 45/18 47/11 47/11 51/19 51/24 52/6 52/23 have [71] haven't [5] 19/13 30/19 47/20 55/2 55/5 having [4] 7/7 16/21 33/17 51/9 he [136] he'll [1] 19/9 he's [10] 25/22 33/15 45/23 47/17 48/15 51/22 51/24 53/4 55/23 55/23 header [1] 39/18 hear [7] 8/12 10/24 11/15 12/4 17/25 28/11 29/1 heard [6] 6/14 6/16 27/10 27/13 28/17 55/2 hearing [1] 58/15 hearsay [13] 16/18 18/4 18/22 18/23 19/12 19/12 46/8 47/15 47/15 50/9 50/20 51/20 52/20 heavily [1] 50/1 heavy [1] 17/21 held [1] 58/10 help [3] 29/14 29/15 29/16 helps [1] 48/12 her [19] 16/2 18/18 22/14 23/1 24/10 24/12 25/20 25/20 46/4 47/24 48/1 48/1 48/2 48/3 48/3 48/4 48/4 50/1 56/17 here [11] 2/15 4/7 5/24 22/20 29/17 29/17 39/4 48/15 51/24 52/24 53/4 Here's [1] 25/23 hereby [1] 58/7 hey [1] 53/12 high [1] 17/17 highly [1] 46/5 him [49] 3/16 5/8 5/8 6/7 12/23 13/1 13/9 19/6 25/21 25/22 26/11 26/13 26/24 27/2 27/4 27/8 28/17 28/22 30/6 32/6 32/7 32/7 32/12 32/14 32/18 32/21 33/4 33/11 33/20 34/20 34/23 35/12 35/13 35/17 35/25 47/13 47/20 47/25 48/16 49/22 51/16 51/21 51/23 51/23 51/24 51/25 52/25 54/23 56/18 his [31] 3/16 3/16 17/16 17/19 19/10 26/24 28/21 33/16 33/16 34/12 34/16 38/2 40/19 44/5 47/11 48/7 48/10 48/14 48/16 49/14 50/10 50/15 50/18 50/25 52/15 52/25 53/3 53/6 53/18 53/21 54/22 hit [4] 33/10 33/18 34/24 48/3 hold [1] 44/7 holding [3] 33/7 33/8 33/8	I'd [3] 2/13 12/5 12/5 I'll [4] 3/2 20/24 23/7 51/7 I'm [24] 13/21 14/21 15/18 16/25 23/5 28/9 29/23 30/1 31/1 31/6 31/15 32/24 37/14 39/7 43/25 48/24 49/1 51/4 51/9 52/1 57/4 57/11 57/12 57/19 idea [1] 50/17 identified [6] 22/16 24/5 24/21 24/22 46/4 47/12 identities [1] 9/13 identity [1] 8/2 imagine [1] 20/4 impact [1] 52/3 impeach [4] 45/21 50/14 53/18 54/23 impeachment [6] 46/6 47/16 47/16 50/4 54/17 54/20 impermissible [1] 50/20 impersonated [2] 4/11 5/8 implication [7] 7/10 9/11 9/16 10/2 10/6 10/19 18/15 implied [1] 10/8 imply [2] 5/5 8/8 important [1] 55/7 impression [3] 7/11 31/4 36/14 improper [4] 12/12 50/4 54/17 54/20 inaccurate [1] 8/18 inaudible [1] 31/5 included [1] 13/7 including [1] 52/8 inculpate [1] 53/24 inculpated [1] 54/3 inculpating [1] 54/14 indication [1] 22/22 indicted [2] 3/15 37/1 indictment [4] 9/18 9/25 15/25 37/3 indictments [1] 12/13 individual [2] 22/21 24/24 individual's [1] 24/13 info [2] 39/5 39/8 information [6] 15/1 16/15 24/25 45/9 56/10 57/1 instead [2] 31/2 40/10 instructed [2] 11/19 11/19 intend [3] 12/23 19/19 19/20 intending [1] 51/4 intent [1] 2/14 intention [2] 22/13 38/12 internet [1] 4/20 interruption [1] 44/12 interview [33] 15/13 15/19 16/2 17/1 18/3 18/8 18/9 18/12 19/7 22/13 23/18 23/20 24/25 25/1 25/6 25/14 26/7 26/15 26/19 27/7 27/11 36/20 45/1 45/20 45/25 49/7 49/20 50/25 51/3 53/20 54/6 56/14 56/16 interviewed [8] 18/14 19/25 20/11 20/11 22/14 23/1 24/23 25/16 introduce [4] 3/12 8/6 8/10 11/24 introduced [3] 3/7 4/3 11/12 introducing [2] 13/18 50/19 invested [1] 34/16	J.P [1] 1/11 JACKSON [4] 1/6 1/18 12/8 58/11 Jesika [1] 53/22 John [4] 12/22 18/8 18/9 18/15 JPB [2] 1/5 58/12 JUDGE [4] 1/11 2/8 12/5 13/12 judith [1] 1/22 1/25 58/4 58/23 July [1] 42/2 jurors [2] 2/12 13/25 jury [42] 1/10 2/11 5/25 6/11 6/12 6/14 6/19 7/11 7/12 7/21 7/23 10/17 10/20 10/24 11/10 11/14 11/18 12/17 13/5 14/4 14/8 17/6 17/8 19/11 19/15 23/6 23/9 23/11 28/10 30/2 30/15 43/8 44/18 46/13 46/15 48/11 48/13 48/17 51/11 55/7 55/14 55/25 just [47] 2/15 2/24 2/24 5/9 5/17 7/19 7/24 9/3 10/1 10/5 11/10 12/8 12/17 12/19 17/22 19/12 19/16 19/22 22/2 22/4 24/21 25/1 25/13 27/9 28/17 29/4 29/9 29/9 30/2 30/16 31/6 31/11 31/17 36/1 36/3 40/7 42/24 45/18 46/19 46/24 48/16 50/13 50/14 50/24 51/4 51/9 55/16 Justice [1] 37/10
	K	
	Kahlil [1] 6/23 Kaushal [1] 1/16 keep [2] 52/13 55/14 kind [2] 5/5 43/5 knew [7] 22/24 33/11 35/9 35/15 35/18 36/4 49/17 knotty [1] 17/11 know [34] 2/13 6/19 7/21 7/24 11/10 20/1 20/3 22/24 22/25 23/24 24/14 25/4 26/3 26/5 28/16 29/1 29/2 33/7 33/9 33/10 33/16 33/17 35/19 36/8 36/15 43/21 44/4 49/17 50/8 51/11 51/14 52/16 55/7 55/23 knowledge [4] 4/15 6/17 7/14 24/15 known [1] 22/12 knows [1] 55/10	
	L	
	label [1] 29/10 lack [1] 18/23 ladies [3] 14/11 17/6 46/13 laid [1] 16/19 laptop [1] 21/23 last [10] 17/13 18/21 21/25 22/17 24/5 24/9 24/13 25/5 34/4 41/24	

L	18/15 21/9 21/13 21/19 21/25 25/22 29/17 29/18 32/2 32/11 32/11 32/20 33/11 33/23 34/10 54/16 58/15 mean [8] 10/10 12/25 22/12 30/19 31/16 48/22 51/11 53/8 means [1] 32/9 meet [2] 26/2 26/6 Meghan [1] 53/21 mentioned [1] 13/19 messages [4] 49/10 49/14 49/23 56/18 met [3] 28/20 33/20 34/7 MetaBank [2] 38/10 39/1 mic [1] 56/3 might [3] 15/6 17/17 17/20 Miller [7] 6/11 8/6 8/6 8/7 8/8 8/10 10/22 Miller's [1] 4/18 minutes [1] 2/24 miscommunicated [1] 35/22 misimpression [1] 7/25 misreading [1] 8/17 modus [1] 10/17 moment [2] 6/1 17/7 MONDAY [2] 1/12 58/10 money [14] 29/20 32/8 32/17 33/9 33/10 33/12 33/21 34/3 34/14 34/17 38/2 38/10 41/2 41/4 monies [1] 41/7 Moore [1] 1/17 more [12] 10/19 25/7 26/15 26/21 27/17 32/19 34/4 36/12 36/15 36/18 57/8 57/20 morning [5] 2/6 2/8 3/9 14/11 31/2 most [2] 8/25 32/25 motion [9] 2/20 3/2 6/20 8/3 11/4 12/7 12/11 55/17 57/17 move [3] 12/6 30/12 56/3 Mr [5] 28/19 32/10 32/14 32/24 34/10 Mr. [39] 8/3 10/12 11/5 11/9 12/4 12/22 20/8 25/6 25/8 25/15 25/19 25/21 26/4 27/14 29/9 29/13 32/7 32/16 32/19 33/3 33/20 33/23 34/1 34/7 34/12 35/12 35/24 35/25 36/13 40/2 42/17 42/25 43/13 44/5 47/1 47/3 47/21 47/23 55/18 Mr. Foster [28] 10/12 11/5 11/9 20/8 25/6 25/15 25/19 25/21 26/4 27/14 29/9 29/13 32/7 32/16 32/19 33/3 33/20 33/23 34/1 34/7 34/12 35/12 35/24 35/25 36/13 42/25 47/21 55/18 Mr. Foster's [4] 8/3 25/8 40/2 42/17 Mr. John [1] 12/22 Mr. Marshall [1] 12/4 Mr. Thomas [4] 43/13 44/5 47/1 47/3 Mr. Thomas's [1] 47/23 Ms [1] 24/5 Ms. [50] 3/2 9/4 12/3 12/8 13/14 13/15 13/22 14/14 17/25 18/24 19/17 19/20 22/14 22/25 23/3 23/14 24/24 25/2 25/18 26/4 28/3 28/6 36/4 38/20 39/13 41/19 44/2 44/7 44/13 45/18 47/8 47/21 48/19 49/12 49/15 50/2 50/3 50/6 50/8 51/2 52/18 53/10 54/16 54/21 55/4 55/8 55/15 56/1 57/8 57/16 Ms. Chaiken [12] 3/2 12/3 13/15 13/22 17/25 19/20 47/8 50/3 52/18 53/10 55/4 57/16 Ms. Chaiken's [4] 50/2 50/8 Ms. Christian [2] 22/14 22/25 24/24 25/2 Ms. Holland [3] 38/20 39/13 41/19 Ms. Jackson [1] 12/8 Ms. Lee [2] 28/3 28/6 Ms. Pyfrom-Foster [6] 25/18 26/4 36/4 47/21 49/15 55/8 Ms. Webster [20] 9/4 13/14 14/14 18/24 19/17 23/3 23/14 44/2 44/7 44/13 45/18 48/19 49/12 50/6 51/2 54/16 54/21 55/15 56/1 57/8 much [4] 32/5 32/21 33/6 33/22 multiple [2] 40/19 41/6 must [1] 9/13 my [11] 2/14 11/17 11/17 12/11 13/8 18/5 21/23 25/23 29/10 31/4 33/21	N
later [6] 14/3 47/23 47/24 49/20 53/6 56/25 laundry [1] 37/21 law [3] 4/23 11/23 12/1 lawyer [1] 26/9 lawyers [1] 26/16 lay [3] 10/1 23/7 25/13 leading [1] 7/8 leap [1] 54/4 learned [2] 15/9 40/15 learning [1] 48/13 least [2] 15/13 39/16 Lee [2] 28/3 28/6 left [1] 7/11 legitimate [1] 38/13 Leigh [1] 1/19 lender [1] 24/13 lengths [1] 49/8 let [11] 2/13 3/3 8/12 11/10 12/4 17/25 21/7 23/7 51/7 51/11 54/16 let's [7] 13/14 14/4 19/22 23/6 42/6 46/19 47/6 liar [7] 4/13 6/5 7/8 45/23 53/17 55/22 55/23 lie [1] 53/2 lied [7] 8/1 47/16 48/25 53/5 53/6 53/21 57/14 light [1] 34/5 like [32] 10/1 10/23 12/19 17/14 24/11 26/25 29/10 29/11 29/13 29/15 29/15 30/6 30/17 31/4 33/4 33/5 33/16 33/17 33/17 33/20 33/23 34/1 37/13 37/13 38/13 39/2 40/11 43/3 43/3 43/5 52/14 56/12 likely [2] 4/5 36/15 limine [1] 6/21 limited [3] 23/8 43/17 56/13 limits [1] 19/20 line [6] 1/10 6/10 6/11 6/25 9/9 50/16 lines [1] 31/7 list [5] 12/23 13/4 39/9 39/17 40/8 listed [1] 40/4 listen [1] 30/15 listener [1] 18/20 listening [1] 6/13 literally [1] 18/24 little [9] 9/3 26/21 27/9 27/17 28/17 29/15 36/18 56/3 57/20 loan [5] 15/21 16/12 22/13 24/20 24/22 loans [3] 15/24 16/9 38/17 logistics [1] 52/1 long [4] 17/10 27/8 42/13 42/23 look [3] 38/13 46/10 57/20 looked [2] 17/23 21/8 looking [4] 4/2 16/10 36/3 38/23 looks [2] 39/2 39/21 lot [2] 3/6 40/10 Lunch [1] 57/24	name [9] 4/18 22/17 24/5 24/9 24/13 24/14 40/2 40/4 42/17 named [2] 22/21 34/17 names [6] 4/14 6/7 6/16 7/9 7/14 39/16 nature [1] 51/5 need [7] 6/19 6/25 7/21 30/16 50/5 51/11 57/19 needs [1] 7/24 never [4] 9/13 26/24 27/4 34/12 news [2] 37/5 37/12 newspaper [2] 19/1 19/4 next [11] 17/20 18/11 18/12 25/1 29/24 32/23 33/19 54/9 57/9 57/11 57/14 nightclub [1] 29/10 nil [1] 17/20 nine [1] 40/22 no [34] 1/18 1/4 4/9 6/18 6/19 6/25 7/5 7/7 9/15 12/24 19/3 22/22 26/10 26/12 26/14 27/1 27/3 27/6 29/19 29/20 30/21 32/10 33/18 43/7 44/19 45/21 45/23 46/7 46/25 47/5 50/4 54/12 57/18 58/12 non [1] 18/23 non-hearsay [1] 18/23 nontestifying [1] 50/14 nontruthful [1] 51/17 nonwitness [1] 47/6 Nope [1] 32/19 normal [2] 12/2 19/21 normally [1] 12/2 NORTHERN [2] 1/1 58/6 not [113] note [4] 1/17 11/17 55/16 56/12 noted [1] 10/17 nothing [3] 8/9 12/18 29/20 notice [1] 53/11 now [8] 5/24 6/3 22/2 25/4 32/2 37/15 55/20 57/5 number [6] 1/10 1/10 8/15 12/9 25/5 25/23	O
M	machine [1] 58/9 made [9] 7/10 10/25 12/9 13/2 25/9 28/17 51/18 52/6 52/8 major [1] 52/9 make [7] 7/6 9/14 12/21 19/18 31/17 33/14 38/13 makes [2] 4/24 8/3 making [1] 52/13 man [1] 33/7 manipulated [1] 32/10 many [3] 3/1 6/14 7/1 marked [3] 21/18 27/23 29/23 market [4] 33/10 33/14 33/18 34/24 Marshall [2] 1/18 12/4 materials [1] 13/5 matter [7] 50/10 50/12 50/19 52/9 52/12 56/11 58/11 may [7] 1/5 1/9 6/12 18/13 45/12 51/11 55/7 maybe [7] 2/12 5/15 10/16 19/14 19/18 51/7 51/13 me [28] 2/13 8/12 9/6 11/7 12/4 13/16 13/17 13/21 14/19 15/19 17/25	objected [2] 10/22 56/20 objecting [1] 53/11 objection [14] 10/16 10/25 11/1 11/18 16/18 23/5 23/13 46/20 50/8 50/21 53/10 57/5 57/7 57/17 obviously [2] 5/12 51/19 off [14] 5/15 5/20 5/21 6/25 41/2 41/7 44/9 44/10 45/13 45/14 46/16 46/17 57/21 57/23 offense [2] 8/21 11/16 offer [1] 18/5 offered [6] 46/6 50/10 50/12 52/13 54/23 56/10 offering [2] 52/11 52/21 Office [1] 26/19 Officer [5] 2/11 2/17 13/25 14/1 23/9 offices [1] 58/7 official [8] 1/3 1/5 1/6 1/11 1/19 1/22 58/5 58/24 often [1] 26/15 oh [2] 33/7 52/13 okay [92] once [4] 21/6 24/18 26/16 29/15 one [28] 3/5 3/22 5/17 6/1 8/23 9/2 12/9 13/23 15/13 15/24 16/9 26/11 26/13 29/5 30/25 32/2 32/23 33/19 34/1 34/4 34/4 35/11 38/16 44/7 45/4 46/25 48/12 48/17 ones [1] 30/25 ongoing [1] 14/24 only [9] 1/5 1/10 7/15 7/16 12/5 42/2 53/5 54/25 57/4 open [6] 16/23 47/22 48/6 51/18 54/5 58/10 opened [1] 3/8 opening [4] 12/9 12/22 13/12 14/21 opens [4] 5/14 50/17 51/13 56/8 operandi [1] 10/18 opposition [1] 55/17 options [1] 38/5

O	plus [2] 32/24 32/25 point [15] 3/6 5/2 5/9 7/6 22/24 26/4 31/24 35/11 35/17 35/23 36/8 44/23 48/14 53/8 56/22 pointed [1] 12/17 points [1] 2/25 portion [2] 1/9 48/24 portions [1] 27/22 possession [1] 40/20 potential [1] 11/21 PPP [3] 7/25 34/13 38/17 PPP loans [1] 38/17 preclude [1] 6/21 preparation [1] 1/18 preparing [1] 44/17 presence [1] 19/14 presented [1] 4/15 presenting [1] 49/25 press [2] 37/7 37/9 pretty [3] 17/20 51/13 52/2 prevent [1] 48/13 previously [3] 3/19 27/22 28/21 primary [3] 9/2 45/4 54/17 prior [2] 21/3 52/25 probably [6] 13/8 21/8 32/25 33/23 36/18 40/23 problematic [1] 30/8 proceedings [9] 1/10 5/21 44/10 45/14 46/11 46/17 58/10 58/14 58/18 process [1] 26/21 processes [1] 36/12 produced [4] 20/15 20/21 20/23 55/11 proffer [17] 19/18 19/22 19/23 44/24 45/5 45/19 45/20 46/21 46/23 47/14 47/24 48/7 48/9 48/11 48/14 51/18 56/23 program [1] 38/11 prohibited [1] 1/12 promised [1] 48/23 promotion [1] 33/5 propensity [3] 4/4 4/9 5/5 proper [3] 11/7 45/23 55/2 prospective [1] 13/6 protect [2] 49/8 54/7 protected [7] 47/19 47/24 48/1 53/20 54/2 55/7 55/13 protecting [1] 55/1 prove [2] 5/7 52/21 provide [4] 43/13 43/16 45/8 57/1 provided [3] 16/14 20/18 43/20 PSR [1] 13/5 published [1] 3/10 purported [1] 24/11 purpose [11] 4/6 6/18 7/5 18/23 45/21 45/23 46/7 53/16 54/25 55/2 55/3 purposes [2] 38/16 47/19 pursuant [1] 30/13 put [14] 3/18 5/5 12/6 12/24 18/24 29/15 33/9 33/13 43/25 44/4 46/9 48/11 51/1 55/8 puts [3] 5/18 6/16 7/9 putting [2] 19/11 53/11 Pyfrom [19] 25/16 25/18 26/4 36/4 44/16 46/2 47/20 47/21 49/8 49/15 49/25 53/1 54/2 55/1 55/8 55/13 55/14 56/6 57/15 Pyfrom-Foster [11] 25/16 44/16 46/2 47/20 49/8 49/25 54/2 55/1 55/13 55/14 56/6 Pyfrom-Foster's [2] 53/1 57/15	R raised [1] 7/17 rapid [11] 37/16 37/20 38/4 38/11 39/1 39/3 39/10 40/8 40/19 42/16 42/25 reached [1] 24/24 read [11] 13/4 19/1 29/4 30/6 30/14 31/7 31/7 31/25 32/2 32/23 33/19 reading [1] 22/20 real [1] 29/3 really [6] 5/4 6/18 7/15 7/16 8/4 25/1 Realtime [1] 58/5 reason [1] 48/1 reasons [1] 53/3 recall [2] 22/19 44/22 recap [1] 2/25 receipts [3] 43/3 43/5 43/5 receive [1] 23/20 received [10] 2/21 20/1 20/25 21/1 21/6 22/6 23/23 24/1 27/14 40/8 receiving [3] 20/3 22/10 36/1 recent [1] 55/10 recess [1] 57/24 record [19] 3/1 5/20 5/21 5/23 6/2 29/10 31/8 44/9 44/10 45/13 45/14 45/16 45/17 46/9 46/16 46/17 57/21 57/23 58/18 recording [1] 28/16 records [3] 38/25 39/2 42/4 recruiter [1] 38/2 recruiters [3] 8/22 8/24 8/25 reduced [1] 58/15 reference [5] 6/21 12/11 12/22 13/2 13/9 referenced [2] 40/1 40/3 referencing [2] 1/10 22/20 referring [1] 38/4 rejoin [1] 14/2 rejoined [1] 17/22 related [3] 12/12 15/2 36/17 relationship [1] 53/23 release [2] 37/8 37/9 releases [1] 37/5 relevance [4] 17/17 17/20 50/3 50/6 relevant [10] 11/6 15/10 16/7 46/5 48/17 49/24 50/7 50/15 52/3 56/7 relied [6] 47/9 47/10 47/20 48/16 55/5 55/6 remained [1] 40/11 remaining [2] 21/13 31/25 remember [4] 20/13 20/22 25/5 36/9 repeat [1] 20/20 repeatedly [1] 46/1 replay [1] 28/9 reply [1] 2/22 report [2] 16/2 22/7 reported [1] 58/9 reporter [10] 1/6 1/11 1/17 1/22 1/22 9/6 58/4 58/5 58/5 58/24 REPORTER'S [1] 58/2 represent [2] 26/17 39/22 representing [1] 24/12 request [2] 42/6 42/14 required [1] 27/4 responding [1] 11/1 response [10] 8/3 10/16 10/21 10/24 11/18 43/23 44/1 44/5 54/20 55/17 responses [6] 2/21 8/15 43/14 43/16 43/18 48/21 restricted [1] 1/6 result [1] 24/19 resulting [1] 37/12 retirement [3] 33/21 34/3 34/17 reverse [1] 3/11 review [3] 16/22 18/9 21/6 reviewed [8] 16/5 17/14 17/17 19/6 19/16 20/13 22/7 24/2 reviewing [1] 22/10 Ricky [1] 40/12 right [70] rise [1] 52/9 road [1] 38/9 role [5] 6/23 6/24 8/21 9/19 10/10 roles [1] 11/15 rolling [1] 2/15
P	Q question [18] 7/3 9/23 9/23 10/16 11/7 11/7 18/11 35/19 54/9 56/19 57/3 57/5 57/7 57/10 57/11 57/12 57/13 57/14 questionable [1] 51/2 questioning [10] 5/14 6/9 6/10 6/10 6/12 7/1 9/10 10/9 10/10 50/16 questions [10] 6/22 9/14 9/20 9/23 12/24 21/13 23/8 46/22 56/12 56/25 quite [2] 15/18 36/7 quote [1] 34/8 quote/unquote [1] 34/8	

R	slice [2] 6/8 48/10	take [9] 2/21 2/24 3/5 13/14 17/10 22/9 24/19 41/14 57/19
row [3] 39/18 39/25 40/4	sloppy [2] 12/10 12/11	taken [4] 4/10 4/11 4/19 57/24
rows [1] 39/22	slow [2] 9/3 49/11	taking [1] 41/2
RPR [1] 58/23	snippets [1] 30/24	Tal [1] 1/16
rule [7] 3/24 4/23 5/10 27/22 53/9 53/19 53/19	solely [1] 12/12	talk [4] 18/16 25/21 25/22 50/5
Rule 608 [1] 53/19	some [23] 2/22 9/11 12/8 15/10 15/22 27/10 28/20 31/2 33/7 33/9 33/14 34/5 34/7 35/17 36/16 37/7 41/9 43/19 43/21 44/23 46/22 51/13 56/22	talked [1] 48/9
ruling [3] 57/4 57/11 57/12	somebody [5] 17/19 18/7 24/12 45/22 52/23	talking [2] 33/6 33/15
Ryan [1] 6/23	someone [14] 3/25 4/11 6/6 6/6 9/25 10/14 22/16 24/5 24/9 36/19 45/5 47/12 54/13 55/19	tape [3] 30/24 31/3 31/3
S	someone's [1] 4/10	targets [1] 15/2
S.W [1] 1/23	something [3] 4/17 18/1 33/3	tax [2] 35/9 36/17
said [25] 3/21 4/6 4/8 6/4 8/8 8/22 10/5 16/11 24/8 24/13 25/21 25/22 28/19 31/8 32/8 34/12 34/16 34/23 35/14 48/14 49/8 51/19 55/18 56/15 58/14	sometime [3] 14/22 20/5 23/22	technology [1] 1/18
same [1] 6/22	sometimes [7] 8/24 10/11 10/12 15/4 15/6 42/10 42/13	Ted [1] 1/23
Samir [1] 1/16	somewhere [1] 20/4	TELDRI [14] 1/7 4/16 4/20 7/22 7/23 35/9 47/12 48/2 48/3 48/8 54/3 55/9 55/12 58/12
Saraliene [1] 1/19	sorry [8] 16/25 25/10 28/4 31/15 39/7 44/2 44/12 49/1	tell [6] 14/19 26/11 26/13 49/21 54/6 54/9
say [19] 6/9 8/5 18/1 18/8 18/13 18/17 18/17 19/1 19/4 28/17 28/19 32/25 35/8 35/10 36/11 47/18 53/2 54/3 55/9	sort [11] 5/1 8/17 10/1 24/8 26/3 35/12 36/14 37/7 38/13 45/4 51/4	telling [1] 33/4
saying [9] 29/13 30/9 34/14 35/25 36/2 47/20 49/10 50/11 55/20	sound [1] 40/22	tells [1] 49/19
says [8] 18/10 29/9 39/4 39/8 49/15 49/22 52/16 55/1	sounds [2] 15/20 43/12	ten [1] 2/12
scam [2] 24/9 24/11	speak [3] 6/15 25/19 27/5	territory [1] 5/2
scenario [1] 13/14	Special [1] 14/15	test [1] 35/12
scheme [5] 3/15 3/17 4/1 34/13 37/16	specific [2] 24/20 25/7	testified [6] 25/5 37/15 37/19 41/24 47/11 52/23
schemes [1] 3/20	specifically [6] 8/20 27/13 37/19 38/4 45/24 48/25	testify [1] 45/25
scot [1] 5/15	spoke [2] 25/15 27/8	testifying [4] 5/14 8/7 11/25 45/22
scot-free [1] 5/15	stamps [1] 36/16	testimonial [1] 7/18
scroll [1] 39/13	stand [2] 14/6 55/9	testimony [5] 4/8 6/13 6/18 8/18 53/17
search [1] 41/21	start [4] 6/25 8/20 46/19 47/6	than [9] 7/6 10/19 13/22 36/12 36/18 42/7 45/21 53/17 57/8
seated [3] 14/9 17/9 23/12	started [3] 38/10 42/2 56/15	thank [20] 2/5 2/18 3/4 8/14 9/5 9/8 14/7 14/10 14/11 14/12 14/16 14/23 23/10 23/15 24/15 25/3 28/6 41/18 44/14 49/5
seats [1] 2/4	Starting [1] 29/6	that [390]
second [8] 4/2 10/4 12/21 13/23 32/2 44/7 49/20 56/14	state [2] 4/19 46/20	that's [49] 4/6 4/15 4/17 4/25 4/25 5/1 5/2 8/11 10/19 10/19 10/20 13/11 15/24 15/24 16/22 20/8 20/16 20/23 21/3 23/4 24/8 24/24 28/5 29/5 30/7 30/8 32/5 33/11 33/11 35/10 36/22 37/22 38/16 40/3 40/9 40/14 40/15 40/23 41/16 41/24 42/5 45/4 45/20 47/16 48/14 50/11 53/8 55/20 56/18
Secret [4] 15/9 21/9 24/22 24/23	statements [13] 7/18 11/20 12/8 13/11 18/3 18/6 26/24 27/18 47/23 48/7 50/18 51/4 56/8	theft [1] 8/2
Secretary [1] 4/18	STATES [7] 1/1 1/4 1/11 1/23 3/10 58/6 58/11	their [17] 4/11 4/14 5/6 5/6 6/4 6/17 7/4 7/14 7/19 7/24 9/13 9/19 11/15 13/4 26/18 26/20 48/12
SECURITY [2] 2/17 14/1	stay [2] 19/20 42/13	them [16] 2/14 4/12 11/7 26/19 30/25 36/1 36/2 36/3 38/1 38/2 41/15 42/21 43/23 45/6 49/21 53/11
see [8] 2/6 2/12 7/5 16/11 16/14 35/15 38/20 51/7	Stenograph [1] 58/9	then [35] 6/15 8/21 8/22 8/25 9/20 10/25 12/21 13/2 15/22 18/11 18/13 18/16 18/18 18/24 19/9 19/17 20/23 22/9 25/1 26/17 30/6 30/14 30/14 34/5 37/3 38/1 38/12 40/4 48/12 49/20 52/9 54/9 55/6 56/10 57/14
seeking [2] 7/18 7/19	step [5] 3/5 17/6 25/1 46/14 49/4	there [46] 3/21 4/9 4/13 5/2 5/4 5/9 5/14 6/18 6/19 6/25 7/12 8/4 9/10 9/11 9/15 10/2 10/5 10/25 12/24 13/9 15/13 17/2 19/17 22/22 26/21 27/2 29/16 34/4 35/3 35/5 35/5 35/23 37/5 37/7 37/9 37/12 37/14 38/5 38/13 39/16 40/5 43/19 45/21 46/7 46/22 47/7
seemed [2] 17/13 28/17	still [6] 14/24 16/23 17/22 19/13 49/21 53/15	There's [1] 45/23
seems [3] 51/2 52/14 57/5	Stites [27] 14/5 14/15 14/19 18/25 19/25 22/6 23/17 28/15 29/1 29/12 29/21 31/23 32/5 32/8 32/12 32/15 32/17 32/21 33/2 33/22 33/25 34/5 34/9 38/23 41/21 44/16 49/3	thereafter [2] 23/21 23/22
seen [1] 48/3	stock [5] 33/9 33/10 33/13 33/18 34/24	therefore [3] 3/23 4/5 9/16
seized [1] 38/10	stolen [1] 9/13	these [9] 7/2 7/6 29/4 38/25 39/22 40/10 40/25 41/7 43/2
send [1] 38/2	stopped [1] 38/9	they [69]
sent [2] 3/9 21/9	store [1] 43/5	They're [1] 53/4
separate [3] 6/10 12/13 39/22	straight [1] 7/8	thing [6] 7/16 12/5 33/6 48/12 48/18 57/4
Service [4] 15/9 21/9 24/22 24/23	strongest [1] 2/25	things [8] 6/17 7/9 12/25 31/13 37/13 40/25 43/3 51/14
Services [1] 38/8	struggling [1] 28/11	think [68]
session [6] 1/5 44/24 46/22 46/23 47/15 56/23	stuff [3] 17/18 29/11 36/17	thinking [3] 3/6 25/11 32/24
several [2] 21/3 25/4	subject [1] 11/4	third [1] 29/18
she [27] 16/11 16/14 16/17 17/25 19/5 19/6 22/16 24/8 24/8 24/11 24/11 24/13 25/20 25/21 25/21 36/7 36/9 36/10 36/11 36/15 36/18 44/20 46/3 47/25 49/9 52/16 52/17	submit [1] 44/18	this [92]
shed [1] 34/5	subpoena [3] 43/8 43/14 43/16	Thomas [54] 4/10 4/18 6/5 6/5 6/6 6/15 6/16 7/8 7/8 7/13 7/13 9/1 9/12 9/22 9/24 10/13 13/4 13/7 13/10 27/15 28/20 34/17 34/23 36/23 37/20 38/1 40/11 40/18 43/13 44/5 44/17 44/23 45/19 46/1 46/4 46/24 47/1
shit [6] 32/11 33/5 33/5 33/15 33/17 33/17	such [2] 33/10 33/10	
shop [1] 29/9	suggest [1] 6/12	
short [2] 13/17 32/1	suggested [3] 5/25 13/22 16/17	
should [3] 18/16 26/13 29/24	suggesting [3] 31/1 31/6 52/5	
show [14] 3/24 4/3 16/20 18/6 18/7 18/23 19/5 19/10 21/21 45/22 52/3 54/11 54/23 54/25	suggestion [2] 5/15 54/1	
showed [1] 15/19	summer [1] 43/11	
showing [2] 18/19 47/19	supposed [3] 11/13 28/21 43/13	
shows [1] 4/19	sure [11] 14/21 15/18 17/5 30/1 30/10 31/17 36/10 37/14 43/25 49/3 52/1	
side [1] 2/24	surveillance [2] 42/11 42/12	
sidebar [2] 45/17 46/11	swipe [1] 41/15	
similar [1] 3/20		
simply [2] 56/20 57/4		
single [1] 13/19		
sir [2] 2/17 43/24		
sit [1] 21/7		
site [2] 41/22 42/7		
situation [6] 3/14 5/1 5/18 5/25 6/3 12/2		
skeptical [2] 35/9 35/11		

T	26/2 29/4 34/6 49/12 50/5 53/21 53/25 54/5 55/13 56/9 use [3] 37/16 49/15 53/4 used [4] 1/18 4/14 4/18 55/19 uses [3] 6/6 6/7 7/14 using [4] 37/20 40/25 41/2 54/2	which [15] 3/11 3/24 9/11 9/21 11/3 13/15 17/20 19/12 27/23 29/23 30/13 35/23 45/1 49/25 53/18 while [4] 21/7 29/18 32/11 36/7 Whittley's [1] 6/24 who [25] 5/13 6/6 6/6 7/12 7/13 10/3 10/6 10/11 11/10 11/15 35/7 36/19 43/21 43/23 43/25 44/4 45/22 47/12 48/9 48/22 52/23 53/22 54/10 54/11 55/19 whoever [1] 5/6 whole [3] 6/13 17/12 48/14 whose [1] 40/4 why [12] 2/24 5/2 29/2 30/2 35/24 47/23 48/1 51/10 53/2 53/2 53/6 55/13 wide [1] 51/13 wife [1] 53/21 will [8] 1/6 3/1 11/18 12/24 26/18 30/15 31/23 55/18 willing [1] 25/22 wire [3] 12/14 12/15 12/15 withdraw [1] 57/13 withdrawals [1] 41/3 withdrawing [1] 41/9 withdrew [2] 17/8 46/15 within [1] 19/20 without [6] 4/14 6/17 7/14 19/11 31/12 53/5 witness [16] 8/7 11/7 12/23 12/23 21/24 29/5 31/7 46/21 46/25 47/17 48/15 48/22 50/14 51/22 52/24 56/9 witnesses [2] 10/9 13/6 wolff [4] 1/22 1/25 58/4 58/23 work [4] 2/22 14/24 36/19 46/10 working [2] 28/2 56/6 world [1] 18/25 would [52] 2/14 3/24 8/17 11/17 11/21 13/3 13/8 13/17 13/21 17/6 17/20 17/23 18/11 18/15 19/10 19/16 20/1 20/4 20/7 21/8 23/23 24/1 25/21 25/21 26/24 27/21 29/10 30/6 30/12 31/4 32/25 36/12 36/18 37/23 39/18 45/25 47/22 48/6 49/3 50/18 50/20 53/1 54/5 54/8 54/9 54/12 54/25 55/6 55/16 56/9 56/12 56/13 wouldn't [3] 30/17 31/14 51/10 wrapping [1] 51/12 wrong [1] 3/13
Thomas... [17] 47/3 47/10 48/13 49/7 51/16 52/24 53/17 53/21 54/2 55/5 55/6 55/8 55/11 55/19 55/22 56/6 56/22 Thomas's [6] 8/21 10/17 46/21 47/23 48/7 55/24 those [18] 6/20 6/22 8/1 9/14 11/4 11/8 11/10 12/24 18/6 23/8 27/18 27/18 38/9 43/18 43/21 49/9 49/14 50/19 thought [7] 3/17 16/22 16/23 17/12 17/12 25/20 36/18 thousand [1] 33/15 thousands [2] 41/10 41/10 three [2] 12/13 33/14 through [10] 8/25 9/17 27/23 30/13 31/20 34/1 38/2 38/8 38/10 41/3 time [18] 8/25 14/12 15/18 16/25 21/1 22/1 26/9 27/1 27/2 27/8 27/24 34/1 34/2 36/4 36/10 37/1 42/14 53/23 timeframe [2] 16/22 23/25 timeline [2] 21/12 25/13 times [3] 22/5 22/15 41/11 timing [2] 20/3 23/8 together [3] 44/1 44/5 56/6 told [10] 17/12 18/15 25/18 25/20 27/4 27/14 27/17 34/23 35/12 38/1 too [4] 42/23 51/25 53/15 53/20 took [1] 36/20 top [1] 29/6 towards [1] 48/3 transaction [1] 12/15 transactions [2] 42/16 43/3 transcript [15] 1/3 1/9 1/11 1/13 1/19 1/10 8/18 17/15 29/24 30/3 30/21 31/11 31/12 46/10 58/17 transcripts [5] 1/5 30/19 31/13 31/16 31/25 trial [5] 1/10 17/18 21/3 26/25 55/25 tricked [2] 5/7 5/8 tried [1] 6/8 tries [2] 3/12 54/13 trouble [2] 48/5 51/9 true [8] 4/17 22/17 22/23 22/25 40/14 52/15 52/17 58/17 truth [8] 50/10 50/11 50/12 50/19 52/9 52/12 52/14 56/11 truthful [12] 16/14 43/18 45/2 45/6 45/8 46/23 48/7 48/23 56/15 56/21 57/1 57/6 try [3] 16/24 26/18 42/15 trying [9] 8/11 42/18 48/24 50/13 52/22 53/4 54/4 55/21 55/21 turned [1] 13/5 Turner [1] 1/23 two [6] 3/22 17/17 27/9 27/10 33/14 38/9 type [2] 2/22 5/12 typewritten [1] 58/15	V vacuum [1] 6/12 value [2] 31/9 35/24 versus [2] 17/1 17/17 very [5] 6/4 12/1 35/8 55/10 56/13 victims [1] 8/2 view [1] 3/22 VOLUME [1] 1/5 vs [1] 1/5	W want [14] 3/5 13/16 16/24 21/13 25/13 30/4 31/9 32/2 45/5 46/9 48/4 50/24 51/9 51/15 wanted [9] 3/18 10/24 16/11 16/14 25/19 31/16 31/17 51/25 54/7 wants [5] 18/5 18/7 19/5 47/18 51/8 warrant [1] 41/21 was [157] wasn't [10] 9/22 10/2 10/5 10/15 11/1 17/14 27/4 31/15 36/2 36/2 way [11] 4/1 4/2 5/17 18/8 22/17 30/14 41/4 46/2 47/10 47/11 54/14 ways [2] 3/22 41/6 we [93] we'll [2] 14/2 51/7 we're [18] 5/1 8/11 31/11 38/23 41/18 44/9 45/13 46/16 47/2 47/4 49/25 50/13 51/3 51/11 51/16 51/17 53/12 57/21 Webster [21] 1/19 9/4 13/14 14/14 18/24 19/17 23/3 23/14 44/2 44/7 44/13 45/18 48/19 49/12 50/6 51/2 54/16 54/21 55/15 56/1 57/8 week [4] 17/13 18/21 25/5 41/24 weeks [2] 17/17 33/14 welcome [2] 31/3 31/10 well [20] 2/6 6/9 8/8 12/1 17/3 17/10 18/1 26/20 29/13 31/4 31/10 38/5 50/9 51/8 52/1 52/12 55/10 56/19 57/9 57/13 went [6] 9/17 18/14 18/16 33/17 49/8 56/14 were [48] 6/20 7/1 7/1 7/2 7/3 7/6 8/1 8/1 8/1 8/1 8/24 9/16 9/23 10/3 10/6 10/11 13/4 16/9 18/22 23/17 28/15 28/21 34/8 34/12 35/3 35/12 36/16 37/5 37/12 37/14 38/5 38/7 38/9 39/9 40/10 40/25 42/16 42/18 42/20 42/22 43/18 43/19 43/20 46/22 48/9 52/24 56/6 58/15 weren't [3] 2/22 42/24 54/7 what [53] 2/25 4/7 4/15 5/24 6/12 6/14 6/23 6/23 7/4 8/11 8/17 9/18 9/18 10/15 10/20 11/3 13/16 13/21 13/22 16/11 16/22 17/12 17/13 18/12 21/17 22/9 22/24 26/3 29/10 29/23 30/9 31/1 31/6 31/6 31/8 34/3 35/16 35/18 35/19 35/24 40/1 40/15 41/24 42/7 43/5 47/20 47/21 51/7 52/5 53/16 55/12 55/12 55/20 what's [1] 54/20 whatever [3] 18/9 19/4 33/8 WhatsApp [5] 4/10 49/10 49/14 49/23 56/18 when [44] 3/12 5/12 6/7 9/17 9/20 10/9 10/9 10/17 10/22 11/24 12/15 14/19 17/14 17/18 17/23 18/7 18/21 19/16 20/1 20/13 20/22 20/23 21/8 22/6 24/1 24/8 24/11 24/22 24/24 27/2 32/13 33/11 33/11 33/20 33/20 34/14 35/25 37/1 38/9 40/18 45/5 49/17 52/16 55/1 whenever [1] 24/9 where [12] 3/6 3/14 4/17 5/4 5/18 5/25 6/4 27/13 42/12 47/23 49/10 49/15 whether [9] 2/15 7/2 7/3 19/9 19/20 44/5 46/22 56/20 57/6
U	U.S [1] 1/19 U.S. [1] 26/19 U.S. Attorney's [1] 26/19 uncharted [1] 5/1 unclear [1] 28/17 under [7] 3/24 4/23 5/10 27/22 49/17 53/19 53/19 understand [11] 11/15 17/24 28/12 28/15 30/1 30/5 30/9 30/10 31/5 50/7 53/10 understandable [1] 30/11 understanding [4] 18/5 40/9 41/16 53/16 UNITED [7] 1/23 1/4 1/11 1/23 3/9 58/6 58/11 unquote [1] 34/8 until [1] 49/21 untruthful [5] 43/19 45/19 47/14 48/11 48/17 up [10] 5/13 14/5 34/20 48/6 51/12 52/25 53/2 53/3 53/12 54/10 us [15] 10/24 13/5 20/15 25/21 25/22	Y yeah [7] 17/12 20/22 32/8 32/16 33/7 33/22 41/2 years [3] 21/3 34/8 36/10 yes [77] yet [2] 17/14 23/1 you [218] you'll [1] 2/11 your [60]